COVID-19 Preparedness and Response Plan

for Nursery and Greenhouse Growers

In Compliance with Executive Order No. 2020-175 (or an Executive Order that may follow and replace it) and the MI Dept of Health & Human Services Executive Directive dated August 3, 2020

Based on Guidance by OSHA and the CDC

**[Name of Company]** (hereinafter “Company”) takes the health and safety of our employees very seriously. With the spread of the coronavirus or “COVID-19,” a respiratory disease caused by the SARS-CoV-2 virus, the Company must remain vigilant in mitigating the outbreak. The Company is a proud part of the nursery and greenhouse production industry, which has been deemed “critical infrastructure” in Executive Order No. 2020-21 (and in all Executive Orders that have followed), during Michigan’s declared State of Emergency.

In order to be safe and maintain operations, and to comply with MI Executive Order No. 2020-175 (or an Executive Order that may follow and replace it) we have developed this COVID-19 Exposure Prevention, Preparedness, and Response Plan to be implemented, to the extent feasible and appropriate, throughout the Company.

This Plan is based on information available from the CDC and OSHA at the time of its development, and is subject to change based on further information provided by the CDC, OSHA, and other public officials.

The Company will monitor the related guidance that U.S. Center for Disease Control and Prevention (“CDC”) and Occupational Safety and Health Administration (“OSHA”) continue to make available, as directed under Executive Order No. 2020-175 (or an Executive Order that may follow and replace it).

Company bears no responsibility for any circumstances arising out of or related to the

adoption, or decision not to adopt, any of the practices or procedures contained in the

COVID-19 Preparedness and Response Plan.

1. Company is implementing the following items to be compliant with MI Executive Order No. 2020-175 (or an Executive Order that may follow and replace it):

* Employers must maintain a record of the requirements set forth in the three items below indicated with a \*.
* Designating one or more worksite supervisors to implement, monitor, and report on the COVID-19 control strategies developed in this preparedness and response plan. The supervisor must remain on-site at all times when employees are present on site. An on-site employee may be designated to perform the supervisory role.
* \*Provide COVID-19 training to employees that covers, at a minimum:
  + Workplace infection-control practices.
  + The proper use of personal protective equipment.
  + Steps the employee must take to notify the business or operation of any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19.
  + How to report unsafe working conditions.
* Provide any communication and training on COVID-19 infection control practices in the primary languages common in the employee population.
* Place posters in the languages common in the employee population that encourage staying home when sick, cough and sneeze etiquette, and proper hand hygiene practices.
* \*Conduct a daily entry self-screening protocol for all employees or contractors entering the workplace, including, at a minimum, a questionnaire covering symptoms and suspected or confirmed exposure to people with possible COVID-19.
* Keep everyone on the worksite premises at least six feet from one another to the

maximum extent possible, including through the use of ground markings, signs,

and physical barriers, as appropriate to the worksite.

* Provide non-medical grade face coverings to their employees, with supplies of

N95 masks and surgical masks reserved, for now, for health care professionals,

first responders (e.g., police officers, fire fighters, paramedics), and other critical

workers.

* Require face coverings to be worn when employees cannot consistently maintain

six feet of separation from other individuals in the workplace, and consider face

shields when employees cannot consistently maintain three feet of separation

from other individuals in the workplace.

* Require face coverings in shared spaces, including during in-person meetings and in restroom and hallways.
* Increase facility cleaning and disinfection to limit exposure to COVID-19,

especially on high-touch surfaces (e.g., door handles), paying special attention to

parts, products, and shared equipment (e.g., tools, machinery, vehicles).

* Adopt protocols to clean and disinfect the facility in the event of a positive

COVID-19 case in the workplace.

* Make cleaning supplies available to employees upon entry and at the worksite

and provide time for employees to wash hands frequently or to use hand

sanitizer.

* \*When an employee is identified with a confirmed case of COVID-19, within 24

hours, notify both:

* + The local public health department, and
  + Within 24 hours, notify any co-workers, contractors, or suppliers who may have come into contact with the person with a confirmed case of COVID-19.
* An employer will allow employees with a confirmed or suspected case of COVID-

19 to return to the workplace only after they are no longer infectious according to

the latest guidelines from the Centers for Disease Control and Prevention

(“CDC”) and they are released from any quarantine or isolation by the local public health department.

* Follow Executive Order 2020-36, and any executive orders that follow it, that

prohibit discharging, disciplining, or otherwise retaliating against employees

who stay home or who leave work when they are at particular risk of infecting

others with COVID-19.

* Establish a response plan for dealing with a confirmed infection in the

workplace, including protocols for sending employees home and for temporary

closures of all or part of the worksite to allow for deep cleaning.

* Restrict business-related travel for employees to essential travel only.
* Encourage employees to use personal protective equipment and hand sanitizer

on public transportation.

* Promote remote work to the fullest extent possible.
* Adopt any additional infection-control measures that are reasonable in light of

the work performed at the worksite and the rate of infection in the surrounding

community.

* Businesses or operations whose work is primarily and traditionally performed

outdoors must:

* + Prohibit gatherings of any size in which people cannot maintain six feet of

distance from one another.

* + Limit in-person interaction with clients and patrons to the maximum extent possible, and bar any such interaction in which people cannot maintain six feet of distance from one another.
  + Provide and require the use of personal protective equipment such as gloves, goggles, face shields, and face coverings, as appropriate for the activity being performed.
  + Adopt protocols to limit the sharing of tools and equipment to the maximum extent possible and to ensure frequent and thorough cleaning and disinfection of tools, equipment, and frequently touched surfaces.

2. Company has taken the test to determine if they are either or both an owner or operator of migrant housing camps and/or an agricultural employer with over 20 workers on site at a time. If either question is positive Company is implementing the required items in MI Dept of Health & Human Services (MDHHS) Executive Directive dated August 3, 2020 titled “Mandatory Testing, Preventative Measures, and Safe Housing for Agricultural Workers”. The following items are excerpted from this Executive Directive, the full Directive can be found at: <https://www.michigan.gov/documents/coronavirus/2020.08.03_-_MDHHS_Public_Health_Order_-_Agriculture_Testing_vF_698096_7.pdf>

Employers and housing providers in certain agricultural settings, as defined below, must provide diagnostic testing for COVID-19 to workers or residents and adopt infection prevention measures as follows:

a. All owners and operators of migrant housing camps licensed by the Michigan Department of Agriculture and Rural Development (MDARD) under Part 124 of the Public Health Code (hereafter “housing operators”) must:

i. Provide testing for any resident with symptoms or suspected exposure to COVID-19;

ii. Provide testing for all newly arriving residents within 48 hours after arrival, unless the resident has already been tested in the 72 hours before arrival;

iii. To the greatest extent possible, house newly arriving residents in a separate living unit from current residents for 14 days after arrival;

iv. If housing in a separate living unit cannot be accomplished, require that newly arriving residents wear a cloth face covering at all times during the first 14 days after arrival, including in dwelling units and after work hours, except when eating, drinking, or performing personal hygiene activities or if the resident cannot medically tolerate a face covering;

v. Provide a second test to newly arriving residents 10 – 14 days after arrival;

vi. Conduct temperature checks of residents at least once per day;

vii. Provide testing for any resident registering a fever of 100.4 degrees Fahrenheit or higher.

b. All agricultural employers, as defined below, with over 20 workers on site at a time (not including the employer’s family members) must:

i. Provide testing for any worker with symptoms or suspected exposure to COVID-19, and

ii. Provide testing for all new workers prior to beginning in-person work.

iii. For the purposes of this order, “agricultural employer” (hereafter “employer”) includes:

1. All employers of migrant agriculture workers who do not live on site, including H-2A workers;

2. All employers of seasonal agriculture workers who do not live on site;

3. All owners and operators of meat, poultry, and egg processing plants;

4. All owners and operators of greenhouses.

c. All employers and housing operators in sections 3(a) and 3(b) must also complete one-time baseline testing of all current workers or residents.

d. All employers and housing operators in sections 3(a) and 3(b) must implement these testing requirements as soon as practicable and no later than by August 24, 2020.

e. Housing operators and employers may agree by mutual consent for an employer or housing operator to enforce some or all of the requirements in section 3(a)(i. – viii.), where more practicable in the environment. Such agreements must be in writing.

f. If an individual is subject to multiple testing requirements under sections 3(a) and 3(b), an employer and housing operator may utilize one test and a documented testing result to fulfill multiple testing requirements for the same period of time. Employers must take primary responsibility for testing in this instance, unless the housing operator agrees to conduct testing by mutual consent.

g. Employers and housing operators only need to provide testing to individuals ages eighteen and over. Youth under the age of eighteen are exempt from the testing requirements in this section.

h. Employers and housing operators are responsible for arranging testing for workers and residents as described in this order, including specimen collection from workers, laboratory processing of the specimens, and ensuring that results are reported to state and local public health authorities. Employers and housing operators may contract with occupational health firms, medical providers, laboratories, or other vendors to complete testing as needed. Any of the responsibilities of employers or housing operators under this order may also be completed by their designees, if they have contracted with a capable entity to provide that service. These contracts must be in writing.

i. Employers, housing operators, or medical providers conducting testing must provide information about the test and the consequence of not testing in the individual’s preferred language. Consent or assent must be obtained from each individual to conduct the test. Employers or housing operators may not pressure, intimidate, or otherwise coerce individuals to decline testing.

j. Workers who decline testing may not conduct in-person work and, if living in a licensed migrant housing camp, must be housed in isolation housing consistent with social distancing and infection prevention measures. The worker must be informed of these requirements in the worker’s preferred language. These measures must continue until the individual is tested and receives a documented negative result.

k. Employers and housing operators are responsible in the first instance for financial costs resulting from testing, though they or their designee may seek reimbursement from health insurance where applicable and may seek state assistance to conduct testing as described in section 3(l). Employers and housing operators may not pass costs along to workers, including costs uncovered by health insurance, whether in the form of direct charges or indirect charges, fees, compensation changes, or other financial means.

Definitions:

a. “Migrant agriculture worker” means an individual who is employed in agricultural employment of a seasonal or other temporary nature, and who is required to be absent overnight from his permanent place of residence, including H-2A workers.

b. “Newly arriving resident” means persons who arrive to a migrant housing camp for the first time or persons who return to the camp after an absence of over two weeks.

c. “On site” means on the property of the agricultural employer at a particular location.

d. “Seasonal agriculture worker” means an individual who is employed in agricultural employment of a seasonal or other temporary nature and is not required to be absent overnight from his permanent place of residence.

3. In addition to implementing the above practices to be in compliance with Executive Order 2020-175 (or an Executive Order that may follow and replace it) and MDHHS’s Executive Directive dated August 3, 2020, we are implementing these items where appropriate for our Company (the Company may amend the items of the Plan based on operational needs):

**Prepare to Implement Basic Infection Prevention Measures**

* Implement telecommuting, flexible work hours, staggered work shifts, and downsized operations as possible.
* All equipment and tools to be sanitized for use the next day.
* Reduce crew size to compartmentalize the workforce into smaller isolatable segments.
* Require employees to wash hands with soap and water frequently for at least 20 seconds. If soap and running water are not available, use an alcohol-based hand sanitizer that contains at least 60% alcohol.
* Social distancing of at least 6’ is required between staff. Encourage workers to stay home if they are sick.
* Encourage respiratory etiquette, including covering coughs and sneezes, and avoid touching your eyes, nose, or mouth with unwashed hands.
* Discourage workers from using other workers’ phones, desks, offices, or tools or equipment. Clean and disinfect all work environments and personal protective equipment daily, including machine handles, tools, safety glasses, safety vests, gloves, and soles of boots.

**Develop Policies and Procedures for Prompt Identification and Isolation of Sick People, if Appropriate**

* Encourage employees to self-monitor for signs and symptoms of COVID-19 if they suspect possible exposure.
* Implement proper policies and procedures for employees to report when employees are sick or experience symptoms.
* Ask any individual exhibiting even minor symptoms to stay home.

**Develop, Implement, and Communicate about Workplace Flexibilities and Protections**

* Encourage workers to stay home if they are sick and avoid close contact with people who are sick.
* Ensure that sick leave policies are flexible and consistent with public health guidance, and that employees are made aware.
* Do not require a healthcare provider’s note to validate illness or absence.
* Maintain flexible policies that permit employees to stay home to care for a sick family member.
* Be aware of workers’ concerns about pay, leave, safety, health, etc.

**Implement Workplace Controls**

* Administrative Controls
  + Encourage sick workers to stay at home.
  + Minimize all contact, among workers, clients, and customers.
  + The time clock will not be used. Text, email or call times in to office manager daily.
  + Replace face-to-face meetings with virtual communications
  + Have delivery drivers remain in their trucks as much as possible, unload plants or materials promptly, and leave the premises as soon as possible.
  + Establish alternating days or extra shifts that reduce the total number of employees in a facility at a given time
  + On production lines, reduce occupied “like task” worker stations and slow production pace.
  + Consider reducing the size or weight of the material being worked (lifted or processed) to accommodate one instead of two workers for the task.
  + Employers will continue to ensure proper use and care where respirators are necessary.
  + Provide workers with up-to-date education and training regarding COVID.
  + Train workers how to use protective clothing.
  + Contact with clients should be executed via email, phone calls, video teleconference, when possible, and if personal contact is required, then maintain social distancing of 6’ with the client or their customers or the general public. If in-person contact is required, then maintain social distancing of 6 feet.
  + Implement daily all-hands communications within company to inform, educate and reinforce SOPs, BMPs and possible next steps.
  + Conduct safety training and staff meetings via video teleconferencing and discontinue group meetings and in-person trainings.
* Safe Work Practices
  + Provide disinfectants, no-touch trash cans and disposable towels in restrooms.
  + Have hand sanitizer available.
  + Require regular hand washing.
  + Post handwashing signs in restrooms.
  + Require staff members to sanitize regularly. Washrooms must be sanitized after every person that uses the facility. All touch areas have to be sanitized i.e. toilet seat, handle, door handles, sink taps, etc.
  + Enforce cleaning and sanitation protocols for all common spaces including trucks, equipment, and the breakroom, locker room and restroom.
  + There should not be more than 10 employees on-site, and when employees are on site, 6’ social distancing should be strictly enforced.
  + If you must work in close proximity to another for a short period of time, wear a face mask.
* Personal Protective Equipment (PPE)
  + Provide gloves, eye and face protection, and respiratory protection for all employees.
  + Wear gloves as much as possible removing only to eat, drink, or touch your face.
  + Ensure that all of the above is properly fitted.
  + Regularly inspect, maintain, and replace items as needed.
  + Ensure that PPE is properly removed, cleaned, and stored to avoid contamination of self and others.
  + No personal uniforms or clothing is to be left overnight. Employees are encouraged to wash clothes at home each evening.
  + First aid kit should have hand sanitizer and Dawn dish soap included.
  + Gloves must be worn when using company tools. Minimize use of shared equipment and tools, all tools are wiped down again at the end of shift. Keep tool sharing to a minimum, ideally each person has their own marked set of tools if enough are able.

**Following Existing OHSA Standards**

* Company will continue to adhere to existing OSHA standards as they apply to worker protection and minimizing pathogen spread.
* Company will provide a place of employment free from recognized hazards.