

Submission by Meat Industry Ireland to Special Committee on Covid-19 Response

17th June 2020

Introduction

1. Covid-19 arrived like a bolt from the blue in February 2020 and spared no part of society or commercial life in any part of the world. Governments, public health authorities and society at large, both commercial and private, struggled in their early responses to the pandemic. And though it emerged in different countries at different times, few were prepared and ready to confront the virus head-on. Delayed response led to larger caseloads and excess deaths in many parts of the world. And while the situation in Ireland appears to have stabilised, and the economy and society is already in phase 2 of reopening, public health authorities repeatedly remind us that they are still learning about the virus and are continuously updating and adjusting their responses.
2. Meat Industry Ireland (MII) is the Ibec trade association representing the meat processing business in Ireland, across the beef, pigmeat, sheepmeat and poultry sectors. Collectively, these sectors accounted for almost €4 billion of food exports in 2019, into the UK, the EU and world markets. The meat sector contributes to the incomes of 90,000 farmers and employs some 16,000 people directly. The sector comprises approx. 50 major processing sites across the length and breadth of Ireland, with an average of 320 persons employed per site.
3. Meat processing is a labour-intensive business, with limited automation available due to the complexity and product craftsmanship of meat processing. Meat plants undertake a range of tasks from the point of animal intake to final packaging of meat products. All stages in between involve high levels of skills, efficiency and expertise and requires finely tuned cohesion between the different component parts along the processing line. The sector, designated as an essential service, is one of the few sectors that remained open for business throughout the lockdown, and where the density of workforce presented a serious challenge requiring the speedy implementation of a wide range of new measures in order to maintain the health and safety of staff. There were no ready-made solutions nor was there a long lead time to implement new prevention and mitigation measures. Neither was there significant independent advice available (largely because such advice was evolutionary) to plant management on the public health protocols necessary to mitigate the virus in the early weeks of March.
4. In as much as Covid-19 created challenges for public health experts, clearly the meat processing sector faced a severe test and had no lens or experience that it could call upon

to face this new challenge. Nonetheless, when the first confirmed case of Covid-19 was reported in Ireland on 29th February and when first stage restrictions were announced by Government on 12th March, Ireland had awakened to the virulent nature of Covid-19. By then, and some weeks before we entered full lockdown, the meat sector had already compiled a list of mitigation measures to put in place which has been continuously updated to reflect evolving best practice (See Annex). It did so without having the benefit of specific workplace related public health advice. In fact, it was not until 15th May 2020 when the HSE published its ***“Interim Guidance on Covid-19”*** specifically for the meat sector, some two months after MII members first implemented detailed mitigation measures across all meat establishments.

5. Where early cases of Covid-19 were detected, businesses quickly responded by following the appropriate self-isolation advice for all citizens who showed virus symptoms and who tested positive. MII members also traced close contacts who were also asked to self-isolate. The precautionary principle was followed, taking no risks with identifying positive cases and close contacts, and excluding them from the workplace. A range of measures were identified and put in place with a clear and singular objective, to keep people safe, against the background of maintaining production and preserving jobs.
6. As the virus spread across communities and the burden of cases multiplied, the reality of the potential for spread of the virus and the reproduction potential of the disease was identified by public health authorities. The State moved to a full lockdown of society and the economy on 27th March, having taken earlier restrictive measures on 12th March. As part of the full lockdown, Government, on 28th March, designated the meat sector amongst a range of essential services that would continue to operate during the lockdown. Meat processing was recognised as an essential service by Government in order to provide continuity of food supply in the domestic, European, and international supply chains and to facilitate the orderly and welfare-friendly movement of animals from farms.
7. The first Covid-19 case was reported in a meat processing plant on 17th March. Further cases followed and as clusters (two or more positive cases) began to form in certain sites the HSE provided collaborative oversight and assistance at local level. In all cases where clusters materialised, plant management engaged closely with the HSE and strictly followed their advice and direction. This has been acknowledged by the HSE. It became clear that many of the cases that emerged were identified amongst people who had shown no symptoms of the virus and who naturally continued to work. Many of these cases were detected as part of wider screening tests conducted at a number of sites under the direction of the HSE at a later stage. This led to the emergence of a small number of clusters with significant positive cases and ultimately to the establishment of a “National Outbreak Control Team”. This team comprises public health officials across a range of

disciplines who continue to supervise prevention and control of Covid-19 cases in meat processing. As an industry we welcome the support and assistance of public health authorities, the HSA and DAFM and are cooperating fully with them in a determined manner to meet our common objective.

8. Since Covid-19 first emerged, some 1,100 meat industry personnel and close contacts have contracted the virus. At this point, the situation across the meat processing sector has substantially stabilised. 94% of Covid-19 positive staff have since recovered and have returned to the workplace. Thankfully, the remaining positive cases are close to full recovery. Of the 50 meat processing sites, HSE data notes there have been a cumulative total of 22 clusters (which is defined as being 2 or more Covid-19 cases), many of which no longer have active positive cases. While there have been more serious outbreaks in 6-8 sites, the vast majority of sites have had low or zero cases.

Social distancing and other protocols in factories

9. As already discussed, no time was lost by meat processing companies in introducing enhanced controls right across the board in every aspect of business operation. COVID-19 response teams were established at each site. An assessment of risks was carried out by senior plant management and for each point of risk, an enhanced measure of protection was implemented, tested for efficacy, and further reinforced where deemed necessary. Staff, and union representatives where applicable, were briefed regularly, and training was provided in relation to the new operational protocols. COVID-19 signage and notices (in all relevant languages) were posted at all appropriate points of contact in plants. Additional and enhanced hygiene, sanitation and biosecurity protocols were introduced, over and above the stringent procedures which were already in place, as appropriate to food business operations. There was renewed focus on the cleaning and disinfection of contact surfaces and communal areas. Breaks and lunches were staggered to comply with physical distancing including creating additional canteen and amenity capacity.
10. A key message to all staff was that they should not enter the workplace if they experienced any of the known symptoms of Covid-19. As part of this, employees entering sites were required to complete questionnaires concerning the presence of Covid-19 symptoms and were required to undergo temperature screening before entering sites. ([link to point E of Oireachtas letter](#)). In addition, all non-essential movement across sites was reviewed and either minimised or eliminated altogether. This included enhancing protocols in respect of inbound service providers and animal transport by hauliers and farmers and outbound product dispatch to the supply chain. Staff not directly associated

with production operations, such as administration and office staff, were designated to work remotely where possible.

11. A first principle that was adopted was the requirement for social distancing. There was initial debate between the advice of the World Health Organisation (WHO) which suggested a one metre rule, and the initial government advice which stipulated to “*keep separate by at least 1 metre (3ft), ideally at least 2 metres (6ft)*”. The latter posed particular physical challenges for parts of the meat processing production chain, specifically in deboning of meat which is a labour-intensive activity. In the event, Perspex dividers to separate side by side contact between employees were introduced and visors were used for employees facing each other on the production line as recommended by current HSE policy guidance. Changes to work rosters and shifts were a key element of these efforts to comply with social distancing requirements. Line speeds were reduced, existing PPE ([link to point C of Oireachtas letter](#)) was complemented by the introduction of masks, face visors or goggles and there were changes made to workstation layouts. ([link to point B of Oireachtas letter](#))
12. It is worth noting once again, that these composite measures, numbering 60 or more, were implemented across plants some two months ahead of the “**Interim Guidance on Covid-19**” provided by the HSE on 15th May which largely reinforced the robustness of the measures already put in place in meat plants. It is also worth noting that where additional measures were recommended by the HSE guidelines these have been fully complied with. Verification of this fact has been overseen by both the Department of Agriculture, Food and the Marine (DAFM) veterinary staff who have a permanent presence in meat plants to supervise EU food hygiene legislation and also by a series of inspections conducted by the Health and Safety Authority (HSA).

Protocols in place to deal with positives tests, testing and tracing of staff and close contacts

13. From the outset of Covid-19, on notification of a confirmed Covid-19 case amongst its workforce, each company initiated a process of contact-tracing to identify the known close contacts within the processing site, during travel to work and where possible, at home. Contact logs are maintained at site level as part of the wider protocols governing outbreak controls. All associated documentation is made available, confidentially, to the HSE to assist it in carrying out contact tracing. Companies fully co-operate with directions from the HSE and Public Health authorities where positive cases arise. This is not only in the best interests of the staff member affected and close contacts, it is also in the

interests of the company concerned in ensuring the least possible spread of the virus within the work environment.

14. Where a staff member fails the screening questionnaire or temperature check on entry to the facility, they are sent home and advised to contact their GP or the HSE for testing. Similarly, any staff members who develop symptoms while at work are sent home to self-isolate and advised to contact their GP for testing. ([link to point A of Oireachtas letter](#)). In many cases, companies have assisted employees in arranging testing.
15. Thereafter, the principal function of management is to advise the staff member and workplace contacts to follow national public health authority guidelines to self-isolate. Those who have tested positive and their close contacts are not allowed re-enter the workplace until their quarantine periods have elapsed and they are free of symptoms. A fitness to work certificate is required from Occupational Health or the employee's GP prior to returning to work. To facilitate people to self-isolate away from family and unaffected housemates, they are offered a place in the State's isolation facilities, such as at City West Hotel. In such cases, staff are made aware, in multiple languages, of the benefits available to them either through company sick benefits schemes where available or from the State pandemic benefits schemes introduced for this purpose.

Living arrangements of staff

16. The Covid-19 related challenges faced by the sector in recent weeks have led to many assertions and erroneous claims by various commentators and representative organisations about working and living conditions associated with meat processing personnel. These have been used to assert that the alleged poor conditions of workers have had a direct bearing on the number of positive cases, without presenting, other than hearsay, any facts or research-based evidence to support such assertions. It is still unknown why in meat processing facilities in countries such as the US, Germany, the Netherlands and elsewhere, the infection rates are high in some facilities, while in other facilities, the infection rates have been lower - even in multiple site companies that had common protocols across all sites. The same issues arise here in Ireland as to why there have been high level clusters, low level clusters and plants with no cases at all. While there have been more serious outbreaks at a number of sites, the vast majority of sites have had low or zero cases. And because we do not have considered answers to these questions we should not opt for the lowest common denominator and apply hearsay where science and research has yet to draw reasoned conclusions. Asymptomatic cases have also proven to be a feature of the virus spreading where following screening tests, positives have emerged from persons who demonstrated none of the common symptoms

known about the disease. The spread of infection has proved more difficult to control where the number of such cases are high.

17. It is nonetheless true that there have been too many positive cases associated with meat plants, every single one being one too many; that also applies in every walk of life. It is equally true that meat processing has had to face challenges within plants at the same time as the virus was spreading at a rapid pace in the community. This also coincided with a period in which few other large-scale labour-intensive businesses were operational. The means towards navigating a pathway to preventing the spread of virus through workplaces, where up to 600 workers congregate daily in some cases, was neither simple nor perfect, no more than it was simple or perfect in other environments where specialised knowledge and expertise was available. Indeed, despite the very best efforts and intentions, there is no sector that can claim to have perfectly managed the threat of outbreaks by having fool-proof robust systems in place to prevent virus spread. The responsibility of compliance rests with every individual and every organisation even where the strongest of mitigation protocols are well established and enforced. For companies that have recently reopened for business in phase 2, they have the benefit of a ***“Return to Work Safely Protocol, a COVID-19 Specific National Protocol for Employers and Workers”***, which was published on 8th May, and provided detailed guidance to businesses on what they needed to put in place in a three week window, enabling them to simulate and test for robustness before reopening.
18. Rather than argue against the assertions about linkages between working and living conditions of staff and the virus spread in meat processing, some facts might help dispel some of these assertions or at least, help restore some balance. Claims have been made of the presence in meat plants of huge numbers of migrant workers as though there was something sinister or inappropriate in this. For the record, the vast majority, some 80% of meat industry employees are of Irish and EU/EEA origin. Irish staff continue to represent the single largest nationality. In recent years, as the Irish economy emerged and prospered after the financial collapse, employment soared in the economy, skills shortages across many sectors emerged and competition for labour intensified. When the meat sector reached the point of not having sufficient resources to service international markets, it sought and secured access to the Employment Permit System and has recruited Meat Processor Operatives and Skilled Knifemen internationally to fill vacancies. Such permit holders currently represent some 20% of the workforce.
19. As regards living arrangements, ([link to point D of Oireachtas letter](#)), in common with other sectors of the economy, the provision of accommodation is not now or never was part of general employment arrangements in the industry. However, as part of the Employment Permit Scheme, processors are required to assist in the sourcing of accommodation for workers coming to Ireland as part of their commitment to ensuring

that there is adequate housing available for permit holders. It is not mandatory that these employees avail of the accommodation arranged by employers and people are not tied to any accommodation and most, in time, elect to find their own accommodation.

20. Shared accommodation is not uncommon amongst employees of the same nationality, in the meat sector or other sectors of the economy. This arises for understandable social reasons in the main and is associated with the potential to live more economically while reaping the social and financial benefits by returning savings to families at home or saving to return home in the future. This is a well-trodden path followed by many working abroad where they pursue the singular objective of generating savings to eventually return home.
21. On the other hand, the majority, mainly European origin, have worked in Ireland in the years since 2005, after EU enlargement, and are fully settled and immersed in Irish life with their families and have advanced in their careers in meat processing.
22. We have been asked also to comment on the extent to which those employed in the industry are covered by sick pay. ([link to point F of Oireachtas letter](#)). Sick pay schemes vary across members in common with industry generally across the economy. They are therefore a matter for individual employers. In all cases, staff are made aware of such benefits where they exist. In addition, they are also fully informed of the State benefits available to them such as the COVID 19 illness benefit. There have been instances where the payment of these benefits has been delayed for administrative reasons. In such instances of delayed benefits, companies have assisted staff so that they have no disincentive to remain at home due to illness.

Closure of plants when necessary

23. Members continue to be guided by HSE advice and especially by the decisions of the National Outbreak Control Group on all aspects of the implementation of the ***“Interim Guidance on Covid-19”***, and are committed to abide by decisions of the Group. No direction on plant closure has so far arisen and members are determined to do all in their powers to avoid such a scenario by directing all their efforts around control and mitigation aimed at preventing virus spread. As an industry, we welcome the continued support and assistance of public health authorities, the HSA and DAFM and we are cooperating fully with them.
24. There have been some generalised suggestions made by commentators and representative organisations on the need for plants to temporarily close in order to perform some “deep cleansing” operation. It is regulated practice in food production, for

deep cleans to be carried out each working day and at weekends as part and parcel of implementing stringent food safety rules. No business can afford to risk non-compliance with such requirements. As the process of deep cleaning is an embedded part of day to day regulatory and food safety compliance, there is no additional step necessary that would give any greater assurance on the level of hygiene practices in meat processing plants. Moreover, no additional level of deep cleansing of production facilities has been required by the regulatory authorities nor by the HSE as being necessary in the context of Covid-19. In every case where clusters have occurred, the relevant public health and HSE guidance has been followed.

Conclusion

25. MII welcomes the opportunity to present this submission to the Special Committee on Covid-19 Response and will be happy to engage further with the committee as required.
26. We can assure you that the industry has worked very diligently to protect employees throughout the course of this pandemic and continues to do so, to the best of its ability. We acknowledge that too many positive cases have emerged despite our best efforts - but this must also be viewed in the context that meat processing, a labour intensive industry, was one of the few sectors that continued operations during the height of the pandemic, during a period when public health advice to business was evolving. We are keen to have a better understanding of why this has occurred given that the majority of the interventions that were put in place by members in March were substantially reflected in the HSE ***"Interim Guidance on Covid-19"***, subsequently published on 15th May.
27. Thankfully, the situation has vastly improved in recent weeks. The number of new cases has declined sharply. The small number of significant clusters have substantially recovered and are being monitored and controlled by the National Outbreak Control Group, and ongoing verification of controls across all plants is being monitored by the HSA and DAFM. At plant level, despite progress, management have elevated their own surveillance and controls, determined to avoid complacency and to work closely with all agencies to ideally eradicate this virus.
28. MII members are proud of their committed workforce. We commend each and every one of them and all those in the extended supply chain for their efforts during these times. MII members appreciate and understand the fears and concerns of their staff and of their families. Now that 94% of all affected staff have safely returned to work, we reserve our best wishes for their continued good health and that of those that have yet to fully recover.

ANNEX:

COVID-19 Protective Measures

Summary of Meat Processor initiatives

Note: The following note is an overview of the extensive range of initiatives being implemented across meat processing facilities. It underlines the breadth of measures being put in place. Companies are constantly reviewing their internal processes & implementing those measures which are most appropriate and effective for their operational set up. Updated versions of this list have been supplied to the Department of Agriculture, Food & the Marine throughout the period.

General:

- COVID-19 response teams established at site / company level – providing regular updates to staff and other stakeholders (suppliers, hauliers, customers etc.).
- Regular briefing and refresher training to all staff (e.g. on importance of handwashing, etc.), daily updates on employee notice boards.
- Procedures booklets issued to staff (advice, guidelines, etc.).
- Plants already have strict protocols in place in terms of staff / visitor hygiene and site biosecurity. These protocols are being enhanced further in the current climate.
- Additional & enhanced cleaning / wash-downs of contact surfaces & communal areas throughout the plant (production facilities, locker-rooms, canteen facilities, photocopiers, keyboards etc.).
- Use of a combination of viricidal and biocides in the plant for cleaning post-production.
- Review all ventilation on site to ensure it is appropriate & working to maximum capacity.
- Detailed risk assessments implemented (across the full facility) which are regularly reviewed.
- All staff encouraged to raise any queries/concerns with supervisor / line manager / HR.

Staff:

- **Temperature screening:**
 - Temperature screening of all personnel entering the site. Protocols in place in the event of personnel having high temperature.
- **On-Site movement:**
 - Minimise / eliminate any non-essential movement across sites.
 - Staff assigned into pods / zones to minimise impact if a particular person / group becomes infected. Applies to factory-floor and office staff.
 - Ensure no one zone / pod is impacted - production, cleaning, maintenance, office.
 - Staggered breaks and lunches as well as start/finish times (to allow for segregation & cleaning of amenities).
 - Implement close contact separation at breaks – stagger canteen breaks, temporary portable cabins to enhance capacity, remove some tables/seating from canteen to ensure adequate distances, disposable single-use cups introduced, etc.
 - No loitering allowed in locker areas / outside areas / car parks etc.
 - Turnstiles & clock-in system (if based on fingerprint ID) to run free. After clocking-in, employees must hand wash.

- **Production areas:**
 - Assess workstations for physical separation – implement changes where feasible.
 - FBOs examining possibility of reduced manning, slower line speeds, extended shifts, etc. (albeit operational challenges & increased costs associated).
 - Installation of perspex screens at workstations as a barrier between operatives.
 - Product specifications simplified to allow more space within the production area (where feasible & depends on customer requirement).
 - Floor markings.
 - Tables and stations moved to facilitate separation.
 - Shift changeovers are segregated by time to allow time for movement between areas.

- **Isolation room:** Appointed a room for the isolation of someone who may present to their manager with COVID-19 symptoms.

- **Work from home:** Some key office functions (where possible) will work from home.

- **Off-site staff movement:** All non-essential movement of staff between processing sites, farms, customer, and other external locations has ceased.

- **Other staff assessments:** Assess staff to identify those who are:
 - Co-habiting
 - Co-travelling
 - Persons in their immediate vicinity while at work

- **Meetings:**
 - Visitor / supplier / customer meetings to be held electronically (e.g. Microsoft Teams) if possible.
 - Where essential that face-to-face meetings take place with external stakeholders, these are being held off-site with appropriate social distancing (and minimise duration).

- **Signage/messaging:**
 - Clear and visible signage throughout the plant.
 - Multi-lingual signage and staff information updates.
 - Audio messaging on the importance of handwashing played on a loop.

- **Return to Work:**
 - Enhanced questionnaires / protocols in terms of staff due to return to work. Final decision rests with HR dept.
 - 14-day self-isolation period for all persons returning from abroad.

- **Annual Leave:** Additional criteria in terms of requested annual leave e.g. specific information on travel arrangements, referral to DFA travel advice, advising staff of potential implications of travel to particular regions, etc.

Hauliers (animals, packaging, other inputs, meat):

Enhanced procedures in place. For example:

- Drivers not permitted to leave cabs whilst on site, apart from their external vehicle checks.
- Paperwork to be completed in cabs.
- Temporary post-boxes have been installed to facilitate dockets / movement certs etc.
- Portaloo facilities (rather than allow into premises).
- No access to canteen. If food required, can be ordered, and facilitated but will be delivered to the driver's cab.
- Appointed yardman to inform drivers and handle paperwork.
- Additional COVID-19 questionnaires.

Farmer suppliers:

- Restrictions introduced for all farmer suppliers.
- No entry to plant buildings – only allowed to the lairage.
- Extra handwashing facilities installed.
- Use of sanitiser in lairage areas & relevant signage re: COVID-19.
- No access for payment collection – payments will be posted / left in Security for collection.

Security companies:

- Enhanced protocols.
- Limit / stop personnel travel between sites (where external security providers utilised).
- Advance schedule of personnel rotas.
- Additional controls / procedures if event of a temporary / new security officer.

Visitors:

- Unannounced visitors to be held in Security until plant management satisfied re: nature of visit.
- Additional COVID-19 related questionnaires for all visitors.
- Plants significantly limiting the number of such visits.
- Information notices and protocols re: COVID-19 brought to attention of all visitors.
- Business critical contractors only.
- Lab samples left at security for pick up by laboratory.
- Clear and visible signage.
- Supervised single access point.
- Extra handwashing facilities.

Questionnaires:

- In addition to normal questionnaires, members are implementing Covid-19 specific questionnaires. These include specific questions on:
 - COVID-19 symptoms.
 - Travel abroad.
 - Close contact with COVID-19 case.
- GDPR statement should be included on the additional questionnaire to indicate the reasoning for it, and the retention period (e.g. 21 days).