INTRODUCTION

As the COVID-19 pandemic continues on for a third year, as business operations attempt to resume normally, and as public health guidelines keep changing, the American Apparel & Footwear Association (AAFA) has updated the guidance previously created with Worldwide Responsible Accredited Production (WRAP) — AAFA’s Corporate Social Responsibility Partner — to enable safer factory operations during the “new normal” we currently face. As guidance changes and operations try to adhere to them, it is critical for management to maintain heightened health and safety protocols for workers to prevent the further spread of COVID-19. As such, please note this guidance replaces and updates the AAFA/WRAP Guidance for the Continued Safe Operations of Factories During COVID-19.

AAFA and WRAP have compiled these best practices for factory management to continue safe and responsible production. We hope these practices are only necessary for the short term; however, the reality is that many will become standard procedures for the long term. Some of the recommended changes have cost implications, but such costs are necessary to protect the health and safety of workers.

This document provides general guidance only. The guidance is based on the best data available from a variety of sources and is not meant as medical advice. Rather, this guidance focuses on issues that must be addressed in a workplace operating amid the ongoing COVID-19 pandemic and provides best practices to address those issues. Local conditions will vary significantly, so the guidance provided cannot be considered comprehensive. Further, all facilities should ensure their operations are in full compliance with relevant and specific instructions issued by local governmental authorities, whether in the form of their own guidance or as mandatory or regulatory pronouncements.

AAFA wishes to thank AAFA Spring 2022 Policy Intern Arianne Levine for her assistance in putting this guidance together.

OVERVIEW

• The core elements of each recommendation in this document trace back to one or more of the following key practices:
  o Vaccination (including booster shots);
  o Enhanced sanitization measures (including minimizing touch points);
  o Personal protection (including face masks and regular hand washing); and
  o Proper identification (and isolation) of high-risk cases.

• Overall, actions should be approached from a management systems point of view, using risk-based scenario planning. Two key facets connect all the advice that follows:
  o Flexibility
    ▪ The situation will continue to evolve, and changes may be needed quite rapidly. Make plans but be prepared to tweak them constantly and swiftly.
  o Communication
    ▪ Because circumstances are constantly changing, careful and regular communication (between buyers and manufacturers; between management and workers) will be extremely important.
  • In uncertain times, clarity of instructions (even if those instructions change from one day to the next) is critical.
GENERAL ISSUES TO CONSIDER

- **How can we limit touch points?**
  - It is important for management to consider how to make entry and clocking-in procedures as contactless as possible.
    - For example, eliminating biometric (fingerprint) based procedures in favor of a contactless alternative.

- **How can we achieve full (or a high level of) vaccination?**
  - Evidence has proven that being fully vaccinated and boosted against COVID-19 can lower the risk of getting and spreading COVID-19; it also greatly reduces the risks of symptoms, sickness, or further complications if COVID is contracted.
  - Management should strongly encourage workers to get fully vaccinated and fully boosted and incentivize them to do so.

- **Minimizing financial loss to incentivize workers to follow protocols.**
  - Workers who will lose 5 days of pay for isolating due to COVID might not get tested out of fear of financial loss.
  - Management should try to minimize financial loss to ensure workers follow local guidelines, get tested, and quarantine when necessary.

GENERAL FACTORY MANAGEMENT

- **Continually update your plan and recalibrate it to reflect current circumstances, which can change quickly.**
  - Make sure the team that updates the plan is properly empowered (senior managers and worker representatives) and where available, includes a qualified medical officer.

- **Communicate the plan with all the workers.**
  - Establish procedures for workers to follow and ensure they understand who to turn to if they have questions or concerns. Educate workers on what the latest version of the plan is and make sure information on changes is communicated to workers immediately, is readily available, and is easily accessible.

- **Have a clear plan for what to do if/when a worker tests positive.**
  - Elements of this plan should include:
    - Outreach to other workers that may have been exposed;
    - How the worker(s) should quarantine (including details on what kind of support the worker will be provided); and
    - Duration of any planned facility shutdown for deep cleaning.
  - CDC guidance, which should be posted for workers to see, for those who test positive is as follows:
    - Stay home and quarantine for at least 5 days.
    - Wear a mask if you will be around others in your home.
  - Have reporting protocols in the event someone tests positive and ensure that workers are aware of the protocols.
  - Make sure the plan follows local government guidance/regulation for reporting positive cases and for duration of quarantine.

- **Have daily communication with workers.**
  - Reinforce existing policies with workers on a regular basis.
  - Provide follow-up in all cases where questions have come up, or incidents have been reported.
  - Ensure worker representatives are involved in this process as much as possible.
**WORKER SAFETY**

- **Strongly encourage workers to get fully vaccinated and boosted.**
  - Ways to incentivize vaccination:
    - Provide paid time off for workers to get vaccines/boosters.
    - Hold onsite clinics where free vaccinations/boosters are available.

- **Testing workers regularly.**
  - As tests become more available, cheaper, and provide results more quickly, factories should consider a regular testing program for workers.
  - Depending on workforce size, management could institute a regular, interval-driven approach – based on such issues as the availability of tests, the time between test and result, the rate of infection in the facility and/or community, whether workers live together in dormitories, and other factors.
    - Alternatively, management could establish a random testing procedure. If a worker tests positive, they should immediately be quarantined from the rest of the workforce and there needs to be a clear process for what happens next. Will the individual receive any treatment on site, or be sent home? How long must they quarantine? When, and under what conditions, can they return to the factory (for example, will a negative test be required)? Will tests be provided to them? What about other workers who have been in close contact with the worker? Will workers be compensated during quarantine?

- **Require workers who are not fully vaccinated or properly boosted to wear face masks.**
  - For workers who are fully vaccinated and boosted, masks should be optional.
  - Who will provide masks?
    - While allowing workers to use their own (where adequate) cloth masks may be an option, the best practice would be to provide new disposable masks to each worker daily.
    - Masks should be readily available, for free, for workers.
  - What type of mask?
    - The mask must effectively cover the nose and mouth.
    - The mask does NOT need to be N95, or even a formal surgical mask.
    - A number of reusable cloth masks can be procured and distributed to the workers to allow for them to have enough available for use at any given time, with proper plans and protocols for regular washing, etc.
    - Otherwise, new disposable masks should be provided to each worker daily (as indicated above, this is considered the best practice).

- **Encourage use of gloves where practicable.**
  - Use of gloves might not be feasible for certain functions in a factory but disposable gloves should be used, and provided daily by the factory, where practicable (e.g., sorting and packing).

- **Ensure factory is well ventilated.**

- **Institute proper contact tracing.**
  - Inform workers who were near workers who tested positive of their exposure and ensure close-contact exposures get tested for COVID-19.
  - Provide free rapid tests for those who were potentially exposed/in close contact so that they can test.
**FACILITY**

- **Install hygienic stations and implement sanitization procedures.**
  - Contamination on surfaces touched by employees is one of the main ways that COVID-19 spreads in factory settings.
  - Workers should have easy and frequent access to cleaning facilities where they can wash their hands with soap and water.
    - Provide regular training to workers to understand how, and why, they must frequently wash their hands (with soap and water) or use hand sanitizer.
  - Management should provide sanitizing hand rub dispensers at each station or on each line.
    - Proper (alcohol-based) hand sanitizers should also be available at all entry points.
    - Consider making use of hand sanitizer mandatory as part of entry AND exit procedures.
    - Establish a process for regularly refilling the dispensers throughout the factory so they do not become empty.
    - Consider regularly providing hand sanitizer for each worker to use on their commute to and from work, or at home.
  - Establish procedures to regularly disinfect common areas and all high-touch surfaces (machinery, door handles, railings, tables) during operation – and establish a team dedicated to carrying out these functions.
    - Most guidance suggests disinfecting these surfaces once every four hours as a minimum frequency.
  - Likewise, management should establish procedures for proper sanitization between shifts.
    - If you will be depending on the worker operating at a station to be the one that cleans it, ensure full and proper training and provide the worker enough time in their shift to complete the cleaning operation. Ensure that the worker is compensated for this time.

- **Treat visitors who enter facilities the same way as workers.**
  - Ask for proof of vaccination and require anyone who is not fully vaccinated/properly boosted to wear a mask while visiting the facility.
  - Masks can be optional for those who are properly vaccinated.
  - For contact tracing purposes, encourage visitors to fill out optional forms stating when (time and date) and who they visited in the facility.

**WORKER TRAINING AND PREPAREDNESS RESOURCES**

- **Organize worker trainings.**
  - Ensure training of all workers. Repeat training regularly. Training should include:
    - COVID symptoms, how to deal with them, and when to get tested.
    - Regularly (and properly) washing/sanitizing hands;
    - Wearing masks correctly and avoiding touching one’s face; and
    - Understanding factory policies in this regard, and who to ask if they have questions.

- **Organize trainings on vaccines.**
  - Educate workers that vaccines are essential to protecting oneself against COVID-19.
  - Make information available, and host training sessions, demonstrating that vaccines protect workers against COVID and sickness.
  - Utilize the training to dispel any myths or falsehoods about vaccines.
  - Share information on the effectiveness of vaccines, how workers can get vaccinated, and share government websites and recommendations with workers.

- **Ensure training extends to hygiene and sanitation that workers should follow at home and on their commute to and from work.**
• **Ensure all supervisors are properly trained and tasked with ensuring compliance.**
  o They will be the front-line on enforcement of the wearing of masks and maintaining physical distance requirements.

• **Encourage prompt reporting of symptoms.**
  o If a worker is experiencing symptoms (e.g., respiratory complications, fever), make sure that they understand the need to report those symptoms immediately.
  o Ensure that workers are not penalized for reporting symptoms.

• **Post signs to educate workers.**
  o The International Labour Organization (ILO) suggests putting up signs and posters in the factory that promote good practices on social distancing as well as hygiene and personal protection.

**IMPORTANT RELATED CONSIDERATIONS**

All the practices outlined above focus on best practices inside the factory itself. However, it is also necessary to take into consideration practices that occur outside of the factory setting due to how rapidly COVID-19 can spread. Not addressing the below issues could easily negate the benefits of the procedures implemented in the factory.

• **Dormitories.**
  o For workers staying in dormitories, there should be hand-sanitizing stations at points of entry.
  o Workers should wear masks in the dormitories when around other people.
  o It is also important to have a separate, segregated area in the dormitory for workers who are feeling ill and/or showing COVID-19 symptoms.
  o Where existing occupancy norms do not permit physical distancing (e.g., if a single room has 4-6 workers), the factory should consider temporarily procuring additional facilities for dormitories, where feasible.

• **Factory-provided transportation.**
  o Hand sanitizer should be provided, for free, for workers to use before and after boarding any factory-provided mode of transportation.
  o It is also important to ensure that the driver and/or supervisor is properly trained on procedures should any rider have symptoms of COVID-19.
  o Workers should wear masks on public transport.
  o The drivers of the factory-provided vehicles should be regularly and closely monitored and follow the same procedures as the riders.

• **Public transportation.**
  o Strongly encourage workers to wear face masks (and possibly gloves) during their entire commute and use hand sanitizer when entering and exiting public transportation.
    ▪ Management should consider providing extra masks and portable hand sanitizers to workers for their commute.
KEY SOURCES OF INFORMATION

Please refer below to a partial list of additional resources on resuming operations post COVID-19.

- **U.S. Centers for Disease Control and Prevention (CDC) COVID Website**
  - Workplaces and Businesses
  - Updated Testing Strategy for Non-Health Workplaces

- **Vietnam**
  - COVID Protocols, Vietnam Ministry of Health
  - Vietnam Government COVID-19 Vaccine Portal

- **Bangladesh**
  - Bangladesh Government COVID-19 Portal
  - Bangladesh Government COVID-19 Vaccine Portal
  - Bangladesh Government Institute of Epidemiology, Disease Control and Research (IEDCR)