



COVID-19 HEALTH & SAFETY FREQUENTLY ASKED QUESTIONS

Version 1, January 2021

We created this resource in response to the many questions the Fair Labor Association (FLA) received from affiliates and suppliers following the release of the FLA’s guidance on COVID-19 Health & Safety:

- ▶ **Guidance Document:** [“Covid-19 Pandemic Guidance Document: Workplace-Level Preparations and Safeguards”](#)
- ▶ **Virtual training:** [“COVID-19 Health & Safety: Factory Precautions and Safeguards”](#)

In this document, we provide general guidance, which will need to be adapted to the specific circumstances of each factory applying it. We will continue to answer questions submitted by stakeholders, including employers, unions, and worker rights organizations, and add them to make this a “living” document.

Our document draws from reliable national and international agencies working on public health and occupational health and safety practices, supplemented by the knowledge and experience of FLA staff based on factory assessments conducted around the world. The information provided is not intended to take the place of legal requirements imposed by the relevant local authorities. Rather, the responses provided are intended as an open source of good practices for factory management everywhere.

Contact us at training@fairlabor.org.

There are many unknowns about the COVID-19 virus, and we continue to learn new characteristics about the disease and how to manage it. Brands and factories should monitor for credible updates from local authorities and international public health organizations.

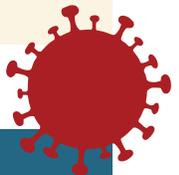


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TRANSMISSION PATTERNS OF COVID-19

Q: Is there any evidence of COVID-19 transmission through air at an aerosol level (particles smaller than 5 μm)?

A: So far, droplet infection is the main channel of transmission declared by the authorities, which could be direct or indirect exposure (through contaminated objects and surfaces) to droplets generated when an infected person coughs, sneezes or talks. There are ongoing discussions about aerosol level transmission of COVID-19 and, so far, results of several studies have showed that the risk of long-range aerosol transmission of COVID-19, unlike some other diseases like measles or tuberculosis, is highly unlikely. **However, according to the U.S. Centers for Disease Control (CDC), there is a possibility of short-range aerosol transmission, particularly in crowded medical settings and inadequately ventilated closed areas.**

► **ADDITIONAL INFORMATION:**

FLA Guidance Document: [Covid-19 Pandemic Guidance Document: Workplace-Level Preparations and Safeguards \(Preventive Measures, Page 4\)](#)

WHO: [Transmission of SARS-CoV-2: implications for infection prevention precautions](#)

CDC: [COVID-19 Overview and Infection Prevention and Control Priorities in non-US Healthcare Settings](#)

ECDC: [Transmission of COVID-19](#)

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Q: Is there a possibility of reinfection for the people who have recovered from COVID-19?

A: According to the World Health Organization (WHO), there is currently no evidence that people who have recovered from COVID-19 and have antibodies are protected from a second infection.

► **ADDITIONAL INFORMATION:**

WHO: ["Immunity Passports" in the context of COVID-19](#)

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Q: We have a high infection rate here. Our factory changed the fingerprint attendance machine to a manual system (time in and out with signature) due to the high risk of COVID-19 spread from the machines. Is manual attendance acceptable for the FLA?

A: The FLA accepts manual timekeeping systems as long as they are accurate and verifiable through the workers' in-out times with their signatures. However, manual systems are typically more suitable for small workplaces than for factories with a large number of workers. Manual systems are vulnerable to mistakes and/or manipulations, so we would recommend factories use **non-contact systems** such as face/iris scanning time clocks in their workplaces.



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Q: We know that droplets float in the air for a long time, so is it effective to put separators with glass at cafeteria dining tables or in between sewing machines?

A: Use of separator screens in different parts of the workplace could be an option when social distancing of 6 feet (2 meters) is not possible. There are several alternative steps that can be taken under such circumstances, of which installation of separator screens is one option; please review the FLA guidance document for other alternatives (Page 6).

▶ **ADDITIONAL INFORMATION:**

FLA Guidance Document: [COVID-19 Pandemic Guidance Document: Workplace-Level Preparations and Safeguards \(Preventive Measures, Page 6\)](#)

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Q: How long can the SARS-CoV-2 virus that causes COVID-19 survive on metal surfaces?

A: Several studies show that the SARS-CoV-2 virus was found on metal surfaces 48 hours after first contact.

▶ **ADDITIONAL INFORMATION:**

FLA Guidance Document: [COVID-19 Pandemic Guidance Document: Workplace-Level Preparations and Safeguards \(What is COVID-19? Page 2\)](#)

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Q: Because of COVID-19, some of our operators are staying at home and coming in every two weeks to report their status. So, how do we know their exposure status?

A: Unfortunately, it is not possible to identify COVID-19 positive cases without testing and following certain medical protocols such as lung x-rays/tomography. Some workplaces are utilizing COVID-19 rapid tests for suspected cases, but problems around access, proper implementation, and accuracy of such tests negatively impact feasibility. The FLA has recommended several procedures for reducing the risk of infection at workplaces in its guidance document, which includes simple steps like:

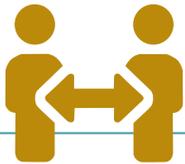
- Identification of high and medium risk groups in the workplace
- Self-reporting of the symptoms and contact with possible COVID-19 positive cases (family members and social connections)
- Temperature checks
- Self-isolation for workers who had contact with COVID-19 positive cases
- COVID-19 contact tracing
- Close coordination with local authorities



► **ADDITIONAL INFORMATION:**

FLA Guidance Document: [COVID-19 Pandemic Guidance Document: Workplace-Level Preparations and Safeguards \(Preventive Measures, Pages 6 & 7\)](#)

FDA: [Coronavirus Disease 2019 Testing Basics](#)



SOCIAL DISTANCING

Q: What is the minimum distance for social/physical distancing? Different sources suggesting different figures like 1 meter or 2 meters, which one is correct?

A: Different authorities have announced different distances. WHO guidance recommends at least 1 meter (3 feet), while other authorities such as CDC are suggesting 2 meters (6 feet) as a minimum. The FLA recommends the higher number, 2 meters (6 feet), since increasing the physical distance reduces the risk of infection.



Q: We are facing some difficulties maintaining social distancing outside of working hours, such as during the break hours in common areas and welfare facilities or in the shuttle buses while coming and returning from work. How can we control it?

A: Factories should carefully implement *Education and Communication*, the third pillar of an Infectious Disease Management System. Unfortunately, reckless behavior on the part of individuals can easily undo all efforts. In a pandemic, training and awareness-raising activities should go beyond workers in the workplaces and extend throughout society. Measures and protocols including social distancing must be explained to the workers along with the importance of successful implementation as the key for preventing or breaking the chain of infection within workplaces. Another important measure is the continuous monitoring of implementation of these measures and protocols through internal audits. Identification of violations and implementation of disciplinary actions against offenders should be considered since violations could put offenders and others at serious risk. Disciplinary procedures act as a deterrent for future violations.

► **ADDITIONAL INFORMATION:**

FLA Guidance Document: [Covid-19 Pandemic Guidance Document: Workplace-Level Preparations and Safeguards \(Education and Communication, Pages 9 & 10\)](#)

“The further you stand away from someone, the fewer droplets you will be exposed to. One meter only prevents you being exposed to the largest of droplets; two meters reduced your exposure — but doesn’t make it zero risk.”

—Jonathan Reid, Professor of Physical Chemistry at Bristol University

Source: [One meter or two? How social distancing affects COVID-19 risk](#)



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Q: What are the best practices to implement physical distancing in factories during the breaks?

A: Staggering break times or shift arrangements at workplaces should be the first step to reduce crowding in social areas and canteens. Using safe outdoor areas during breaks can also help in implementing social distancing requirements. Factories can use floor and area markings in social areas as social distancing reminders and posters and signage for reinforcing social distancing requirements.

► **ADDITIONAL INFORMATION:**

FLA Guidance Document: [COVID-19 Pandemic Guidance Document: Workplace-Level Preparations and Safeguards \(Preventive Measures, Page 6\)](#)

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Q: Is it safe to conduct a fire drill under these circumstances? We don't want to create unnecessary risk during the pandemic with mass evacuation and gathering during the drill.

A: Fire is one of the most significant health and safety risks for workplaces around the world. Industrial fires could lead to catastrophic loss of life and property damage; therefore, strict local legislations exist in different countries for controlling and eliminating this risk. Fire drills are usually an integral part of these regulations.

The FLA understands concerns about possible violations of social distancing rules during a fire drill, especially in certain parts of the workplace, such as emergency assembly areas or fire escape stairs. On the other hand, it is important to bear in mind that the COVID-19 pandemic does not make fire risks in workplaces disappear.

We have seen local authorities in some countries declare some flexibility with conducting fire drills in workplaces. Therefore, we recommend the following:

- 1) If local authorities do not give permission for postponing the drills and/or offer alternatives, then factories should conduct fire drills and pay extra attention to social distancing and other potential COVID-19 risks (see our guidance document).
- 2) If local authorities accept/offer alternative ways and/or permit postponing fire drills, factory management should be careful, check for risks, and decide how to proceed with one or more of the following alternative options:
 - a. Conduct section-/department-based fire drills rather than postponing/cancelling fire drills altogether
 - b. Assess and arrange emergency evacuation routes and emergency assembly areas based on existing social distancing rules and occupant load
 - c. Increase the frequency of maintenance and testing of emergency lighting system/fire alarm/fire detection and fire extinguishing systems
 - d. Increase the frequency of internal H&S audits covering fire safety related matters



- e. Ramp up efforts to increase fire safety awareness among the workers through announcement boards, posters, leaflets, etc.
- f. Implement better communication with local fire departments to ensure legal compliance and emergency preparedness

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Q: We had to postpone annual periodic testing and maintenance activities of machinery and equipment in our factory due to the pandemic. Is this acceptable?

A: Postponing periodical tests and maintenance of high-risk machinery and equipment could lead to serious health and safety issues in workplaces. For the machinery, equipment, and systems listed below, tests and maintenance should be conducted without delay:

- Pressure vessels
- Lifting equipment
- Compressed gas cylinders and gas systems
- Grounding of Electrical System and Lightning Rod
- Residual Current Devices (RCDs)
- Fire detection and alarm systems
- Emergency illumination
- Active fire protection systems
- HVAC system

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Q: We had to postpone or cancel several periodic worker trainings due to the COVID-19 pandemic. Is this a problem? How can we conduct training and awareness sessions while maintaining social distancing?

A: In-person classroom trainings and meetings pose a risk of COVID-19 transmission and are therefore not preferred options during the pandemic. However, unlike some other industries, it is not always possible for factories to organize alternative means, such as online training, due to lack of access to technology and/or insufficient technological infrastructure in their countries. The FLA strongly recommends that factories evaluate alternatives to classroom training and consider one or more of the following:

- Increased awareness-raising activities on selected training topics
- Using visual material such as LCD screens, posters, and announcement boards more efficiently
- Distribution of booklets and/or leaflets covering key takeaways from trainings
- Use of take-home training materials/surveys
- Effective use of technology where possible, such as smartphone applications (text messages for sharing critical information with the workers and/or conducting push surveys)
- Dedicated hotlines/direct HR lines for responding to questions from workers related to any of the training topics covered through the alternative methods listed above



If classroom type trainings are the only option, the FLA suggests that factories organize those trainings in a well-ventilated environment with a limited number of workers and to increase the number of sessions without violating existing social distancing and personal hygiene requirements. In addition, factories are encouraged to provide face masks where possible. Accepting external trainers should be subject to the existing Infectious Disease Management System requirements of the factory.

► **ADDITIONAL INFORMATION:**

FLA Guidance Document: [COVID-19 Pandemic Guidance Document: Workplace-Level Preparations and Safeguards \(Preventive Measures, Page 6\)](#)



Q: Our existing production line setup is based on 4-foot distance between the operators and it is very difficult for us to re-arrange this setup due to existing utility lines (compressed air/electricity/vacuum system etc.). What would you recommend?

A: See Page 6 of **FLA Guidance Document:** [Covid-19 Pandemic Guidance Document: Workplace-Level Preparations and Safeguards](#) for possible risk mitigation steps where 2 meters (6 feet) social distancing is not possible.



DISINFECTION AND SANITIZING

Q: Some facilities have been using disinfection tunnels for workers when entering the premises. Is this a suggested preventive measure or is such a practice more likely to damage workers' health in the long term?

A: The effectiveness and potential harm associated with disinfection tunnels have been evaluated by many different authorities, such as CDC, which underlined that no evidence currently proves that such practices are effective in reducing the spread of COVID-19. CDC further explained that the chemicals used in tunnels could cause skin, eye, or respiratory irritation or damage. The FLA shares these concerns because none of the disinfectants or sanitizers on the market at the moment were intended or developed for such purposes.

► **ADDITIONAL INFORMATION:**

FLA Guidance Document: [COVID-19 Pandemic Guidance Document: Workplace-Level Preparations and Safeguards \(Comprehensive Cleaning Program, Pages 3 & 4\)](#)

CDC: [Cleaning and Disinfecting Your Facility: Everyday Steps, Steps When Someone is Sick, and Considerations for Employers](#)



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Q: Which sanitizers and disinfectants are recommended for COVID-19? How can we be sure about the authenticity of these products?

A: Local authorities in different countries have prepared and published lists to address this concern. As an example, the US Environmental Protection Agency (EPA) prepared a comprehensive list, entitled “List N”, of disinfectants that kill the coronavirus SARS-CoV-2 (COVID-19) **when used according to label directions**. For hand sanitizers, CDC recommends alcohol-based hand rub products, specifically ethanol or isopropanol-based hand rub products with greater than 60% ethanol and 70% isopropanol as active ingredients.

The authenticity of these products is important since **several fake and/or defective products have been reported and recalled by local authorities** since the beginning of the pandemic, such as the U.S. Food & Drug Administration’s guidance on [Eskbiochm](#) sanitizer products, and [recalls of and safety alerts](#) regarding certain hand sanitizers in Canada.

The FLA strongly recommends that factories be vigilant and careful when procuring disinfectants, sanitizers, and personal protective equipment (PPE) to prevent purchasing fake or subpar products. Factories should work with trusted business partners that hold the necessary permits and licenses and follow the official announcements of local authorities about product recalls.

► **ADDITIONAL INFORMATION:**

FLA Guidance Document: [Covid-19 Pandemic Guidance Document: Workplace-Level Preparations and Safeguards \(Comprehensive Cleaning Program & Preventive Measures, Pages 2 - 9\)](#)

EPA: [List N: Disinfectants for Coronavirus \(COVID-19\)](#)

CDC: [Hand Hygiene Recommendations](#)

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Q: We are a garment factory and one of our high-touch points is the garment that operators sew in the line and then pass on from one operator to another. What is the best way to reduce the risk on this front?

A: Technically, soft surfaces such as those of fabrics and garments on the production line are not considered high-touch points. So far, evidence suggests that the virus does not survive as well on a soft surface (such as fabric) as it does on frequently-touched hard surfaces like elevator buttons and door handles. On the other hand, this does not mean that fabrics and garments present a zero-risk situation. The FLA recommends strict implementation of personal hygiene requirements listed under “Personal Hygiene” section of FLA guidance document.



► **ADDITIONAL INFORMATION:**

FLA Guidance Document: [Covid-19 Pandemic Guidance Document: Workplace-Level Preparations and Safeguards \(Preventive Measures, Page 4\)](#)

Johns Hopkins Medicine Health: [Coronavirus \(COVID-19\): Frequently Asked Questions](#)

Q: Which one is better for hand hygiene: hand sanitizer or hand soap?

A: Proper hand washing (see box) is a better and more convenient solution than the use of hand sanitizers. Hand sanitizers can be used if soap and water are not available. It is also important to bear in mind that **hand sanitizers may not be effective when hands are visibly dirty or greasy.**

► **ADDITIONAL INFORMATION:**

FLA Guidance Document: [Covid-19 Pandemic Guidance Document: Workplace-Level Preparations and Safeguards \(Preventive Measures, Page 4\)](#)

CDC: [When and How to Use Hand Sanitizer in Community Settings](#)

Five Steps to Wash Your Hands the Right Way



1. **Wet** your hands with clean, running water (warm or cold), turn off the tap, and apply soap.
2. **Lather** your hands by rubbing them together with the soap. Lather the backs of your hands, between your fingers, and under your nails.
3. **Scrub** your hands for at least 20 seconds. Need a timer? Hum the “Happy Birthday” song (in your native tongue) from beginning to end twice.
4. **Rinse** your hands well under clean, running water.
5. **Dry** your hands using a clean towel or air dry them.

Source: [CDC: When and How to Wash Your Hands](#)

Q: What are the correct locations for hand sanitizer stations? Would it be enough to have them only at worker entry and exit locations? What kinds of stations are recommended?

A: The location of hand sanitizer stations is best identified after a risk assessment study is conducted by the factory’s Health and Safety Committee. The points below should be considered during the study:

- Locations that are easily accessible and always within sight
- High risk areas and high-touch points in the workplace
- Restrooms
- Entrances and exits
- Cafeterias, canteens and break rooms
- Meeting rooms
- Employee desks/workstations



The use of no touch hand sanitizer dispensers, both sensor or pedal activated, is recommended. It is also important to bear in mind that **alcohol-based hand sanitizers are highly flammable** and could lead to a fire incident in case of ignition. Factory management and H&S teams should be vigilant about safe storage and use of sanitizers.

► **ADDITIONAL INFORMATION:**

FLA Guidance Document: [Covid-19 Pandemic Guidance Document: Workplace-Level Preparations and Safeguards \(Preventive Measures, Page 4\)](#)

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Q: What kind of UV light can be used for disinfecting materials?

A: There are different types of ultraviolet radiation and not all of them are same. Only ultraviolet-C radiation, which is emitted by UVC lamps (also known as germicidal lamps), has been found to be effective against the coronavirus family of viruses; however, with a wavelength of 254 nm, it is not safe for humans due to potential damage to skin, eyes and tissue, and is mostly used in closed environments such as ventilation ducts. Recent studies have shown that new generation 222 nm Far-UVC lamps can be used for surface disinfection without risk of skin, eye, or tissue damage, but this solution is not yet available for common use.

Several other pesticidal devices such as ozone generators and air purifiers could be considered, but unlike chemical pesticides/disinfectants, local authorities do not routinely review and evaluate the efficacy and safety of these devices. **Therefore, the FLA does not recommend the use of such devices for surface disinfection, unless there is strong evidence proving their safety and efficacy.**

► **ADDITIONAL INFORMATION:**

FLA Guidance Document: [Covid-19 Pandemic Guidance Document: Workplace-Level Preparations and Safeguards \(Comprehensive Cleaning Program & Preventive Measures, Pages 2 - 9\)](#)

EPA: [Why aren't ozone generators, UV lights, or air purifiers on List N? Can I use these or other pesticidal devices to kill the virus that causes COVID-19?](#)

FDA: [UV Lights and Lamps: Ultraviolet-C Radiation, Disinfection, and Coronavirus](#)

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Q: What surface disinfectants should be used in a GOTS-certified apparel factory?

A: Specific certification/accreditation bodies may have different preferences over this issue, so the FLA encourages factories to make contact with these certification bodies to seek guidance. It is important to bear in mind that **factories should be vigilant about the safety and efficacy of the disinfectants recommended by such certification bodies** and crosscheck to verify if these disinfectants are listed under approved disinfectant lists to kill coronavirus SARS-CoV-2 (COVID-19) declared by local and/or international authorities.



Q: Is there any internationally recommended standard to comply with before procuring cleaning agents, disinfectants, etc. or should we follow nationally accepted standards?

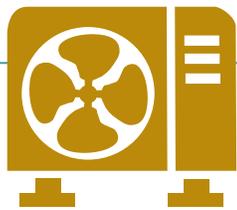
A: Different countries have different local authorities in charge of this issue, so it is important to ensure legal compliance first. In case of an absence of local guidance, factories should use credible international or national organizations as a benchmark, such as WHO or EPA.

► **ADDITIONAL INFORMATION:**

FLA Guidance Document: [Covid-19 Pandemic Guidance Document: Workplace-Level Preparations and Safeguards \(Comprehensive Cleaning Program & Preventive Measures, Pages 2 - 9\)](#)

EPA: [List N: Disinfectants for Coronavirus \(COVID-19\)](#)

WHO: [Coronavirus disease \(COVID-19\): Cleaning and disinfecting surfaces in non-health care settings](#)



HVAC SYSTEMS

Q: How we can assess our HVAC system and understand if it is safe enough to use?

A: Given that the primary transmission pattern of COVID-19 is droplet infection and that there are growing concerns over aerosol level transmission, HVAC systems are becoming a more important weapon against COVID-19. Although the HVAC systems of most industrial, residential and commercial facilities were not designed to cope with a global pandemic and filter aerosol-level virus particles, improving ventilation by increasing fresh air inflow from the outside is strongly suggested along with the elimination of previously recirculating indoor air and the periodic cleaning and maintenance activities of HVAC systems. These steps would provide sufficient protection when combined with other preventive measures. The FLA believes that implementation of medical level filters (HEPA or ULPA) in existing HVAC systems is not realistic or necessary; however, some improvements can be made in existing HVAC systems (see page 8 of FLA's Guidance Document for additional information).

► **ADDITIONAL INFORMATION:**

FLA Guidance Document: [Covid-19 Pandemic Guidance Document: Workplace-Level Preparations and Safeguards \(Preventive Measures, Page 8\)](#)

Q: Can we use HVAC energy recovery systems?

A: No, use of HVAC energy recovery systems are not recommended due to the risk of leaking potentially contaminated exhaust air back into the indoor air supply. Energy recovery systems reuse



indoor air by taking it, filtering it, and then sending it back to the inside environment. Most of these systems do not have filtering that is good enough to catch the virus, so you run the risk of recirculating virus in the workplace.

► **ADDITIONAL INFORMATION:**

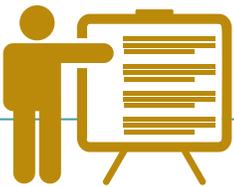
FLA Guidance Document: [Covid-19 Pandemic Guidance Document: Workplace-Level Preparations and Safeguards \(Preventive Measures, Page 8\)](#)

ASHRAE: [Position Document on Infectious Aerosols](#)



Q: Is there any benefit in using air purifiers?

A: Portable or ceiling mounted air cleaners with HEPA or high-MERV filters could be useful for areas where ventilation is not effective and/or the occupant load is higher than in other sections, such as in waiting rooms etc. Factories are encouraged to consult HVAC engineers for the identification of such areas and needs.



TRAINING AND AWARENESS RAISING

Q: Can you share any good practices regarding mental health support during the COVID-19?

A: Please review the *Education and Communication* section of the FLA Guidance Document for more information on this topic. Also, several credible international and national organizations, such as the World Health Organization (WHO) and International Labour Organization (ILO) [links to resources below], have published guidance documents on this issue.

► **ADDITIONAL INFORMATION:**

FLA Guidance Document: [Covid-19 Pandemic Guidance Document: Workplace-Level Preparations and Safeguards \(Education and Communication, Page 9\)](#)

WHO: [Mental Health & Covid-19](#)

ILO: [Managing Work-Related Psychosocial Risks During the Covid-19 Pandemic](#)



Q: We cannot give a common H&S training to our team members. According to local law, trainings are suspended. What do you suggest?

A: Please see the answer to this question in the *Social Distancing* section above.



PERSONAL PROTECTIVE EQUIPMENT (PPE)

Q: What type of mask should we use in our workplace? Several options — FFP2/FFP3/N95/Surgical/Cloth face covering — are creating confusion among the management and workers.

A: Just like other PPEs, the selection of masks should be based on the risk within the workplace. Except cloth face coverings, all of the listed items are considered PPE and are produced according to specific quality standards to provide a certain level of protection. It is important to bear in mind that both over-protection and under-protection can be a risk factor when selecting a PPE. Therefore, at this time, credible international and national organizations suggest that employers follow a risk assessment-based approach and do not solely select PPEs designed for high-risk environments such as medical facilities.

► **ADDITIONAL INFORMATION:**

FLA Guidance Document: [Covid-19 Pandemic Guidance Document: Workplace-Level Preparations and Safeguards \(Preventive Measures, Page 5\)](#)

Q: Is it necessary for the cleaning team to wear full PPE when working on the production floor and in the toilets?

A: Cleaning teams are the frontline soldiers in the fight against COVID-19. Cleaning and disinfecting activities are an integral part of Infectious Disease Management System within the factory. However, the role that cleaning teams play also makes them more vulnerable to possible infection. They also work with strong chemical agents (cleaning and disinfection chemicals), so they should be provided with proper PPE, along with comprehensive training on risks associated with possible COVID-19 infection and the chemicals they use on daily basis. Depending on the result of risk assessment studies, cleaning staff should be provided with gloves, gowns, masks, and face shields. The type of PPE may vary depending on chemicals in use.

► **ADDITIONAL INFORMATION:**

FLA Guidance Document: [Covid-19 Pandemic Guidance Document: Workplace-Level Preparations and Safeguards \(Comprehensive Cleaning Program & Preventive Measures, Pages 2 - 9\)](#)

CDC: [Cleaning and Disinfecting Your Facility: Everyday Steps, Steps When Someone is Sick, and Considerations for Employers](#)