



BEST PRACTICE POLICIES: COVID-19 WASTE AND RECYCLING EMERGENCY

During the COVID-19 pandemic, the work of waste and recycling operations is critical to the health, security, and stability of all society. As information about the virus and best practices to keep everyone safe continually evolve, it's imperative to establish regular communication between employers, labor unions, public health officials, and workers.

For the waste and recycling industry as a whole, we make the following recommendations:

1. Establish a Waste and Recycling Industry Adjustment Board with equal representation from management and unions to enforce policies that ensure the health, safety, and continuity of operations in the waste and recycling sector.
2. To ensure operational continuity and efficiency, place a moratorium on all permanent facility closures and major consolidations that have the potential to disrupt the safe and efficient operation of waste and recycling work during the COVID-19 emergency.
3. Establish a mechanism for the expedient resolution of workplace disputes to prevent the interruption of vital services.

On the workplace level, workers must be protected by employer policies that ensure the health, safety, and resiliency of the workforce. We recommend that employers meet these goals by taking steps to improve operations in I) administration and communication, II) employee protections, III) physical distancing, and IV) increased paid time off, emergency premium pay, and insurance benefits.

I. Administration and Communication

1. Establish a pandemic coordination team with equal representation by management and workers with mutually defined roles and responsibilities to coordinate preparedness and response planning. In cases where workers are covered by a collective bargaining agreement, the union will provide the appropriate worker representative.
2. At least once a week, update staff and customers on how the business is responding to the pandemic. This must include a report of number of cases, number of COVID-19 related absentees, and what policies the company has put into place in response to the crisis, including any changes required because of new developments and the timeline for implementing any policies not already in place.
3. Establish a process to communicate information to employees – email, texts, postings and/or automated calls – on the company's infectious disease outbreak response plans and the latest COVID-19 information. In workplaces with collective bargaining agreements this communication shall be done jointly between the union and the employer.
4. Provide drivers with current information on shelter-in place orders and state quarantine declarations and how they might affect operations and/or routes.



5. Post reminders for workers to:
 - Cover coughs and sneezes with a tissue (or an elbow or shoulder if no tissue is available).
 - Maintain hand hygiene.
 - Avoid touching their eyes, nose, and mouth.
 - Use PPE, such as masks, puncture proof gloves, rubber boots, sanitizer, Tyvek suits, coveralls, etc.
 - Notify their direct supervisor of any contact with someone who has tested positive for COVID-19 or who has experienced COVID-19 symptoms.
 - Workers should refrain from reporting to work if they have symptoms of COVID-19.

II. Employee Protections at the Workplace

1. Conduct a hazard assessment to identify occupational risks to COVID-19 exposure for each job classification. Using guidance from the CDC, NIOSH, and OSHA, work with the health and safety committee, industrial hygienists, and other safety professionals to implement hazard prevention and control practices.
2. Train employees on all hazard prevention and control practices, including proper use, limitations, disposal procedures, and/or cleaning and disinfection procedures of personal protective equipment (PPE, e.g., masks, gloves, uniforms, etc.). Provide COVID-19 prevention supplies in your workplace including but not limited to soap, access to running water, accurate medical thermometers hand sanitizer with at least 60% alcohol, tissues, trash baskets, clean uniforms, Tyvek suits, puncture-proof gloves, face shields, rubber boots, tools, and PPE. The pandemic response coordination team will be responsible for determining how to ensure these supplies are best distributed and made available throughout the workplace.
3. Train employees on proper cough/sneeze etiquette and hand hygiene (cough or sneeze into a tissue, elbow or shirt; wash hands before eating, before and after using the restroom, after coughing or sneezing, before touching the face, before going home and after touching contaminated surfaces, while using break and eating facilities.)
4. The entire workplace, including trucks, shall be sanitized and disinfected as needed, at least once per day. The disinfectant must meet the Environmental Protection Agency's (EPA) criteria for use against COVID-19.
 - 1 Restrooms, breakrooms, and eating areas will be cleaned and sanitized every two hours.
 - Vehicles must be disinfected before any change in drivers or occupants. Areas or items that must be disinfected include but are not limited to keys, the steering wheel, inner and outer door handles, shift lever, any buttons or touch screens, wipers and turn signal levers, driver door armrests, grab handles, seat belts, seat adjusters, other levers, and other nonporous surfaces. A written notice of the date and time the truck has been cleaned will be left on the driver's seat.
 - A driver can refuse to utilize a vehicle that has not been properly sanitized without any discipline.
5. Because contaminated uniforms can spread the disease, for the duration of the crisis, management should retrieve and launder soiled uniforms daily to ensure that workers



do not take the virus home to their families or the general public. Time spent changing into and out of an employer-provided uniform will be classified as paid time, so that workers are able to ensure compliance with this rule.

6. Drivers shall only be required to pick up properly containerized materials (i.e. bagged or canned materials), except wastes where special equipment is required.

III. Physical Distancing for Frontline Workers

1. Consistently practice physical distancing by increasing space between people to at least six feet and limit face-to-face contact between workers and those who come to the workplace by:
 - Allow employees, on a voluntary basis and by seniority adjust starting times to decrease the number of workers/customers who are in the workplace at any given time.
 - Increase the number of staggered meal and rest breaks.
 - Slowing belt speed to space workers farther apart.
 - Suspend production standards and production related discipline. The standards are designed for a normal work environment and do not reflect the need for workers to maintain physical distance, sanitize equipment, work irregular hours or wash their hands to reduce the spread of the virus.
 - Postponing non-essential meetings.
 - Increase ventilation
 - Install physical barriers, such as clear plastic sneeze guards, between workers or occupants of vehicles where maintaining six feet of physical distance is not possible.
2. The pandemic coordination team will designate appropriate physical distancing policies and procedures at all entry and exit locations including but not limited to security stations, break areas in the employer's facility or vehicle, truck stops, maintenance bays/repair shops, transfer stations, and post collection recovery and disposal facilities.
3. Increased physical distancing within the workplace through voluntary and by seniority shift arrangements that reduce the number of workers required to assemble in one place.

IV. Paid Time Off, Emergency Premium Pay, Insurance

1. Workers shall be granted at least two-weeks of paid emergency leave immediately (emergency leave will not be accrued). Emergency leave shall be used before any other paid time off (vacation, sick, etc.). Policies requiring medical documentation of illness will not be required for use of emergency and other employer provided sick leave.
2. Additional emergency leave will be provided for any worker who has contracted COVID-19 until released by a doctor. Any worker required to quarantine by a public health authority or the CDC will be provided an additional 14 days of paid emergency leave.
3. Leave policies will ensure that workers who cannot work due to COVID-19 – whether experiencing symptoms, diagnosed with COVID-19, or placed in quarantine – do not lose pay or benefits. Workers who are required to stay home to care for a child due to



school closings or for a sick family member must be afforded additional paid emergency leave in order to slow the spread of the virus.

4. Employer leave policies should enable and actively encourage workers who are sick to stay home. Advise employees with symptoms of acute respiratory illness to stay home and not come to work until they are free of fever (100.4° F [37.8° C] or greater using an oral thermometer), signs of a fever, and any other symptoms for at least 24 hours, without the use of fever-reducing or other symptom-altering medicines (e.g. cough suppressants).
5. Employees who are well but reside with someone who has COVID-19 or someone who is showing COVID-19 symptoms are granted paid leave.
6. Employees who are well but have come into contact with someone showing symptoms either on duty or off are granted paid leave.
7. Advise employees of their possible exposure to COVID-19 in the workplace if a coworker is confirmed to have COVID-19, while maintaining confidentiality as required by the Americans with Disabilities Act (ADA).
8. Allow employees, on a voluntary basis and by seniority, to adjust starting times to alleviate child care/family care issues at home.
9. Workers in the same work area of the worker who tested positive for COVID-19 shall be required to take a 14-day period of paid time off.
10. Medical insurance deductibles, copays and out-of-pocket COVID-19 related expenses should be waived for employees working during the crisis.
11. To prevent exhaustion, workers shall be limited to the normal number of straight time hours worked before the COVID-19 pandemic at two times the normal rate of pay. In the event of overtime being assigned, workers will be compensated at the rate of three times the normal rate of pay. These paid hours shall include meal, rest, and sanitizing breaks. Employers shall provide two full consecutive days off per week. This shall be in effect for the duration of the COVID-19 crisis. If a worker volunteers to work on one of their days off, then that worker shall be paid at the triple time rate of pay.

Enforcement

The COVID-19 crisis facing our nation – and the heightened risk that sanitation workers face – demands cooperation between labor and management of sanitation companies. To achieve such a level of cooperation, there must be independent enforcement of policies that guarantee labor and management are complying with regulations that make operating under extremely hazardous conditions possible.

Therefore, any violation of these rules and regulations may be appealed to, and heard by, the Waste and Recycling Adjustment Board, or its designee. The Adjustment Board's authority shall be limited to enforcing the above-enumerated policies, making findings of fact, and rendering decisions, including the issuance of injunctive orders, and/or making aggrieved employees whole for violations of these policies. This enforcement provision shall not usurp or replace any additional rights which may be available to workers under an existing collective bargaining agreement.