Ways Companies Are Responding to the Novel Coronavirus (COVID-19) Pandemic

The plastics industry is adjusting daily behaviors to assure we are taking the critical steps necessary to respond to this pandemic. Below, find practices and company changes that some of our PLASTICS members have shared with us.

*We hope this information will be helpful to you, with reminders that the requirements or recommendations of federal, state, local and other authorities may take precedent, that companies may implement more stringent measures, and that not all additional measures being taken by a company may be feasible for your company or worksite. We also note that, as with any forum or media through which Plastics Industry Association (PLASTICS) members may meet, our standing antitrust policy applies here as well. Please review the antitrust reminder below.*

The contributions below were compiled by PLASTICS as a service to the industry but contributed by members and other stakeholders. This document is not particularized to any specific workplace and therefore does not offer specific legal, healthcare, or other form of recommendation. The postings are solely informational and do not constitute PLASTICS’ assertion of recommended or best practices.

Readers are encouraged to consult with their own safety and health professionals; occupational health care providers; attorneys; or other reliable sources prior to implementation of any practices for which such consultation may be helpful. PLASTICS, its members, and contributors, do not assume any responsibility for legal compliance obligations or for any loss or damage arising from reliance on this information. The is made without express or implied warranty of fitness for any particular purpose.

This is a quickly evolving situation, and it is possible that some materials may be quickly outdated. PLASTICS will strive to keep the material current, but please seek confirmation from official or expert sources.

**Protecting and Supporting Employees**

*Social Distancing, Safety and Health Onsite*

- General social distancing within the company.
- Educating employees how to stay safe inside the workplace.
- Separating employees, including salaried and hourly employees. Segregation between teams (teams on one line do not interact with teams on another line).
- Day shifts leave 10-15 minutes before the next shift starts. Send workers in or out through main entries or traffic choke points in five second intervals. Allows the company to clean surfaces and ensures that there is less interaction between shifts.
- Separating employees doing the same job to separate parts of the building.
- No groups during lunch or breaks. No congregating outside the facility or elsewhere at the premises.
• Rearranging break rooms (moving tables 6’ apart).
• Limited or no visitors to the facility.
• Ensuring all teams have PPE.

**Flexibility**

• Staggered staff (1/3 of all employees come in every THIRD day), with the remaining employees working from home (or staying at home). If issues arise, then there is a possibility the company will eliminate a shift.
• Implementing additional PTO (paid time off) for those that become affected by the virus itself (or a family member becomes affected) or if they have to take care of their children with school/daycare closings.
• Remote or work from home initiatives, e.g., all office employees (finance, HR) work from home.
• Eliminate all extended travel.
• Urging/requiring employees to use web-based technologies versus in-person staff meetings or other internal meetings.

**Cleaning**

• Require mandatory handwashing upon entering the facility. Alternatively, use of alcohol-based sanitizer using 60% alcohol or greater.
• Require mandatory handwashing or hand sanitizer at the end of every break and at prescribed intervals (e.g. every 60 or 90 minutes)
• Regular cleaning of workspaces (cleaning crew comes twice daily cleaning doorknobs, phones, tools, equipment controls, keyboards and light switches).
• Having the cleaning crew clean doorknobs, phones, tools, equipment controls, keyboards, light switches and other high-touch features and areas.
• Day shifts leave 10-15 minutes before the next shift starts. Allows the company to clean surfaces and ensures that there is less interaction between shifts. Consider how to manage shared locker areas and change rooms between shifts.
• Shifting cleaning supplies and masks from certain locations to others as their inventory decreases. Shift supply among plants based on demand.

**Managing Visitors, Delivery People, and Vendors**

• Better manage delivery people, drivers and those that in the past have been allowed more freedom to enter (e.g., create a “bull pen” for all incoming traffic and for drivers for outbound traffic).
• All plants are closed to any outside vendors and suppliers (even vending machine suppliers).
• Companies are not allowing truck drivers to use company restrooms.
• Limited or no visitors to the facility.

**Customer Relationships**

• Offering web-based training, service and support for customers.
• Teleconferencing in lieu of in-person sales visits.

**In the Community**

• Educating employees on the benefits of staying safe and practicing isolation and social distancing outside the workplace.
• Supporting the small businesses in your community and our supply chain.
• Reaching out to local temporary employment agencies. As many Americans are let go from other jobs, there are opportunities for them to get hired at plants/factories.
PLASTICS INDUSTRY ASSOCIATION (PLASTICS)

ANTITRUST REMINDERS AND MEETING GUIDELINES

Group activities of competitors are inherently suspect under the antitrust laws. Many agreements and activities between and among competitors, however, are both legal and beneficial to society and the industry. It is expected that all member representatives involved in PLASTICS activities, as well as PLASTICS consultants and meeting participants, will be sensitive to the legal issues involving trade associations and take all measures necessary to comply with U.S. antitrust laws and similar foreign competition laws.

Whether seriously or in jest, **do not discuss** or exchange information regarding:

**Prices, including:**
- Individual company prices, price changes, price differentials, pricing patterns or policies, discounts, allowances, credit terms, warranties, rebates or special financing, indemnification agreements, or other terms and conditions of sale affecting price.
- Industry pricing policies, price levels, price changes, pricing procedures, profit margins or other data that bear on price.
- Individual company data on costs, production, capacity, inventory, sales, profit margins or other data that bear on price.

**Production, including:**
- Individual company plans concerning the design, production, distribution or marketing of particular products or product features, including possible or proposed customers or territories.
- Agreements with competitors to control or limit production, restrict or allocate exports or imports, control or limit product quality or research or allocate sales according to customers, territories or products.

**Marketing procedures, including:**
- Matters relating to dealing or not dealing with actual or potential individual suppliers, customers, or competitors that might exclude them from the market;
- Territorial restrictions, allocations of customers, restrictions on types of products or any other kind of market division.

**Meeting Guidelines**
- Agenda will be prepared and distributed before the start of the meeting.
- Meeting discussions will be limited to agenda items unless the Chair approves additional topics.
- Minutes of a meeting represent the legal record of what transpired. Carefully review draft minutes and call for corrections if the meeting minutes are not accurate.
- Staff (or counsel) will be present at each meeting.
- Object to any discussions or activities that appear to violate PLASTICS’ antitrust policy.
- Avoid colloquial language that might be mischaracterized later (e.g., “dominance,” “only game in town,” “control of market”).

This list is not exhaustive and understanding and acting in compliance with U.S. and foreign antitrust and competition laws sometimes can be difficult. If you have a question about the propriety of PLASTICS activities or discussions in an PLASTICS meeting, you are encouraged immediately to contact PLASTICS counsel or your company’s legal counsel.

**Confidentiality Reminder**

It is expected that all members of PLASTICS will act in the best interests of the association. Discussions at meetings and any documents or other materials that are produced or distributed are confidential. Details of the meeting should not be published, disclosed to any third parties, or used except in support of official PLASTICS business. Naturally, member company representatives can share this with appropriate personnel within their own companies; when distributing within your companies, please remind the recipients of the confidential nature of the information.