

INTERIM ADVICE FOR IFC CLIENTS ON DEVELOPING A COVID-19 EMERGENCY PREPAREDNESS AND RESPONSE PLAN (EPRP)

OBJECTIVE

The objective of this document is to provide IFC clients with basic advice – and a list of resources – for developing emergency preparedness and response plans (EPRPs) for COVID-19-related risks, so that, in collaboration with appropriate and relevant third parties, clients are prepared to prevent and mitigate any harm to workers, their operations, communities, and other stakeholders and to be able to maintain business continuity.

This document is not intended to be exhaustive, and it provides generic rather than sector-specific advice for timely implementation under the current COVID-19 crisis. Companies in high-risk sectors should also refer to sector-specific procedures and standards.

Given the rapidly changing circumstances, IFC clients should be aware of the changing legal landscape and follow the most recent information, recommendations, and regulations regarding COVID-19 from local, regional, national, and international authorities, as applicable. Sources for this document and additional information are listed in Annex 1.

PRELIMINARY STEPS

Before taking any action in terms of COVID-19 EPRP planning, companies should take into consideration the three preliminary steps below:

1) Review information, key practical advice, and available resources on Workers' Health

Review IFC interim advice on providing leadership, managing health risks, and supporting workers in the context of COVID-19. This will provide useful background information for the steps that follow. See:

- [Interim Advice for IFC Clients on Preventing and Managing Health Risks of COVID-19 in the Workplace](#)
- [Interim Advice for IFC Clients on Supporting Workers in the Context of COVID-19](#)
- [Tip Sheet for Company Leadership on Crisis Response: Facing the COVID-19 Pandemic](#)

The above advice documents are available from www.ifc.org/sustainabilitypublications.

2) Review Existing Plans

Review your existing Business Continuity and Disaster Recovery Plan, or any other similar plan developed by the company. If these plans are sufficiently thorough, they should address a variety of contingencies that could disrupt the firm's businesses, including potential infectious disease outbreaks. If the existing plans cover the current pandemic scenario, just ensure that they include the required controls and adapt accordingly.

3) Prioritize Key Business Functions

Assess your business processes, determine which areas are vulnerable, map dependencies, and estimate the potential impact and level of disruption if those processes cease. Consider how the business would adapt to the absence of key processes for varying times, from hours to weeks or longer.

Start by identifying the critical products and services your company delivers and the customers or clients they are delivered to. This information will help in prioritizing those parts of the plan that pertain to the business's most valuable assets, functions, and relationships.

SUGGESTED APPROACH FOR A COVID-19 EPRP

After these preliminary steps above have been completed, the company may opt to prepare a COVID-19 Emergency Preparedness and Response Plan (EPRP) by undertaking four basic and sequential tasks, as follows:

- **Task 1: Defining the Objective, Scope, and Limitations of the COVID-19 EPRP**
- **Task 2: Designating of Roles and Responsibilities of the COVID-19 Crisis Management Team**
- **Task 3: Identifying and Assessing Risks associated with COVID-19 that may impact Workers, Operations, the Supply Chain, and the Community**
- **Task 4: Defining Controls, Resources, and Emergency Responses**

Below is a brief description of the suggested tasks that need to be completed to prepare a rapid COVID-19 EPRP. Since the COVID-19 situation is fluid, these emergency preparedness and response activities should be regularly reviewed and revised as necessary to reflect changing conditions.

TASK 1: DEFINING THE OBJECTIVE, SCOPE, AND LIMITATIONS OF THE COVID-19 EPRP

State the objective of the COVID-19 EPRP, being clear about what should be covered by the plan. It is important that the plan addresses prevention, mitigation, preparedness, response, continuity, and recovery, putting people first at all times and prioritizing the health and well-being of employees and the broader community.

Clearly state the scope of the EPRP. For example, the plan may be intended for a single facility, an entire corporate entity, or several assets located in a single region.

Include a basic list of the main applicable rules and regulations¹ issued by governmental authorities about COVID-19, detailing the scope of these rules and regulations, and stating specifically the obligations these create for the company.

Collaborate with authorities and local community planners so that you can promptly access resources and information that can help you maintain operations and keep your workers safe.

TASK 2: DESIGNATION OF ROLES AND RESPONSIBILITIES OF THE COVID-19 CRISIS MANAGEMENT TEAM

Develop a detailed list of personnel appointed to be part of the Crisis Management Team, stating each person's role in the team. The list must include all necessary contact information. See the "Suggested List of Roles and Responsibilities in a COVID-19 EPRP" below.

Appoint a Point of Contact Person to direct the response strategy and coordinate all the COVID-19 EPRP activities. As necessary, consider additional layers of leadership, with each nominated person being responsible for specified individual elements of the EPRP. These persons should have the necessary decision-making power within the organization to devise and formulate strategies to respond to the emergency. Getting these people on board during the EPRP planning stages can

¹ This list should be regularly updated since regulations and norms are rapidly changing, including new rules, institutional and government regulations, impositions of restrictions, or requirements that are based on the actual status of the COVID-19 outbreak.

help in creating a stronger, clearer plan and a consistent message. Nominate deputies for each leadership position and define the conditions under which these deputies will act. Examples of key positions for this role: Communications Manager and Liaison Officer.

Include health professionals, if available, as part of the Crisis Management Team, since specialized support is needed when dealing with an infectious disease. External professional (contractors) could be included as part of the team.

A note of caution: while others may be involved in the plan's execution, it is imperative that the most senior leadership at the organization be actively involved—and be seen as actively involved—because there will be critical and timely business decisions to make that will require the authority and support of a recognized and empowered decision maker. This will also help to quell any fear and misinformation within the company about these decisions. For additional information on the team composition, refer to the [Tip Sheet for Company Leadership on Crisis Response: Facing the COVID-19 Pandemic](#).

Suggested list of Roles and Responsibilities in a COVID-19 EPRP²

- **Emergency Response Leader**

Description: The company official responsible for overall decision making, including, assuming authority regarding issues of business continuity; making quick decisions on emerging issues; delegating matters as appropriate to functional or area specialists; providing for authoritative communications within and outside the company; and making financial and spending decisions. For example: Chief Executive Officer, Plant/General manager, Chief Operating Officer, or Risk Officer.

- **Area Leaders**

Description: Leaders from key areas of the company who will be responsible for managing internal communications; coordinating controls and implementation at department or unit levels; maintaining communications with company personnel and outside contractors; and keeping group leaders informed of developments and progress. For example: Plant Supervisors, Environment, Health, and Safety (EHS) Manager, Human Resources (HR) Manager, Operations and Maintenance (O&M) Manager.

- **Key Operational Personnel**

Description: Key personnel from vital departments, including Operations, Maintenance, Purchasing, Warehouse, Health, and any other vital roles. Their functions may include tracking and implementing directives, controls and mitigations; procuring necessary items; monitoring critical stock items; supervising personnel functions, such as payment of salaries, determination of flexi work and home-based work, and any other similar arrangements; and reporting back to senior leaders on implementation of these issues.

TASK 3: IDENTIFICATION AND QUALITATIVE ASSESSMENT OF RISKS ASSOCIATED WITH COVID-19 THAT MAY IMPACT WORKERS, OPERATIONS, SUPPLY CHAIN, AND THE LOCAL COMMUNITY³

The company should identify the risks from the COVID-19 outbreak, and for each risk, evaluate its potential impact on the company's operations, and on the corresponding effects on workers, the environment, and local communities.

The risk identification process should be adapted to the conditions of the company and could include a simple list of risks put together based on experience, discussions, and brainstorming among senior personnel from different areas or departments. This risk identification process could also be a more structured process depending on the nature and complexity of the business, the existing conditions, and the resources at hand. The company could opt to obtain external support as necessary.

² Note that these roles may be different than the company's general EPRP, since COVID-19 presents a unique set of conditions and risks that may need to be managed differently than an EPRP covering other scenarios and emergencies.

³ For more details on OHS aspects see [Interim Advice for IFC Clients on Preventing and Managing Health Risks of COVID-19 in the Workplace](#).

A suggested framework to identify the risks associated with COVID-19 could include: (i) appointing a team to identify potential hazards to/from the company; (ii) identifying the level of exposure of employees based on their activities; (iii) evaluating how company operations will be impacted by COVID-19; (iv) identifying if there will be a shortage of supplies and how COVID-19 will affect your direct suppliers; (v) assessing how a COVID-19 spread in surrounding communities may impact employees and activities, including access roads and means of transportation; and (vi) based on the risk assessment, identifying the priority areas to define controls and responses.

To complete this process, risks may be considered in four groups of key impacted areas: workers, operations, supply chain, and community. In addition, all of the risks identified in these four areas impact employee exposure to the virus.

Below are some factors to consider in the risk identification process. This list is not intended to be exhaustive and there may be many other risks to consider depending on the nature of the business activity and on the current COVID-19 situation. Please keep in mind that some of the identified risk factors below may need to be included in more than one group or key impacted area:

Risk factors for workers:

- Large workforce in close contact or confined space
- Meetings and large gatherings
- Accommodation or transport provided to workers
- Processes that require person-to-person interaction or close personal proximity
- Contacts with suppliers or customers
- Workforce members who are elderly or otherwise vulnerable to COVID-19
- Violent outside protests which may delay or prevent workers coming to work
- Reprisal/retaliation against workers for voicing concerns (for example, worker health and safety)

Risk factors for operations:

- Absence of employees or contractors
- Lack of utilities continuity (power, water, wastewater)
- Reduction of information technology (IT) services and communications (radio, Internet, and so forth)
- Mandatory restrictions (such as lockdowns) imposed by government
- Lack of critical equipment for additional safety provisions (power units, process lines, tanks with hazardous substances, pressurized vessels, large- and medium-size inventories of chemicals or hazardous substances)
- The need to reevaluate standard procedures before performing high-risk tasks, such as large or deep excavations, confined spaces, energized equipment, based on changes taken because of COVID-19 (for instance, changes or addition of personal protective equipment (PPE), use of hand sanitizer or modification of any task procedure)
- Protests, property threats, actual or attempted theft, land invasion
- Weakened security response

Risk factors for supply chain:

- Unavailability or delays in supply of key materials or services due to a lack of the materials or to transportation interruptions
- Damaged or contaminated materials

Risk factors for communities:

- Cases of workers spreading the disease to others (such as immediate family members, friends, service providers)
- Customers contracting the disease
- Increased security risks

- Civil unrest due to COVID-19
- Reprisal/retaliation against communities or civil society stakeholders voicing opposition to project impacts (for example, public security crackdowns in project area)
- Inability to effectively manage pollution and hazardous materials (for example, infectious waste)
- Shut-off of regular waste collection and subsequent large accumulation of waste on the streets
- Pollution or environmental risks to the communities.

Once risks are identified, it is important to prioritize them by defining the frequency and severity or any other relevant method, using participatory tools such as brainstorming, group discussions, or similar activities.⁴

Employees' Exposure

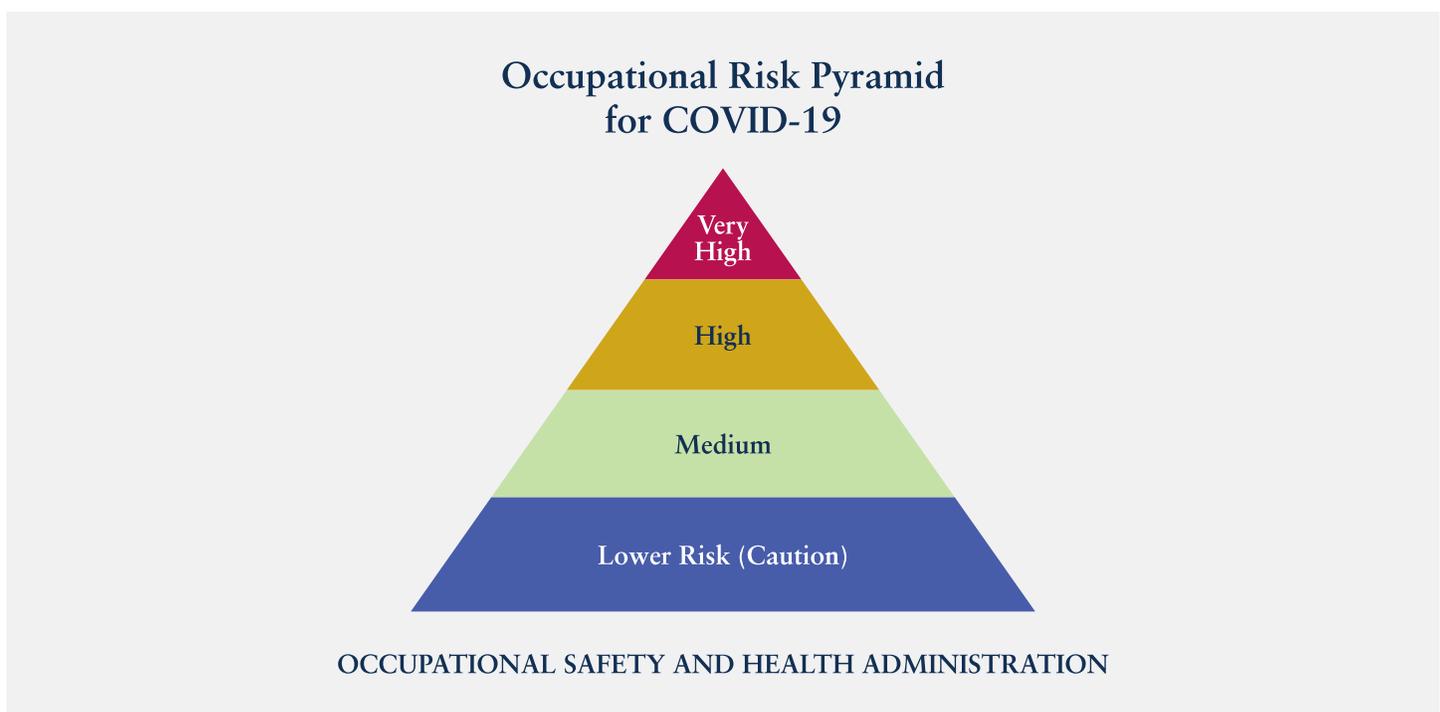
Central to all of these risk factor categories is the critical importance of companies identifying the likelihood of employee exposure to coronavirus, and managing associated risks.

The level of employee exposure will depend in part on whether or not jobs require close proximity to people potentially infected with the virus, or whether workers are required to have either repeated or extended contact with other potential sources, such as coworkers, the general public, suppliers and vendors, and so forth.

Classifying Employees Exposure to COVID-19:

The level of risk for employees depends on the industry type and the activities that are developed. For example, risk level is elevated for a person who works in close proximity (less than 2 meters apart) to others. In general, people who have repeated or extended contact with other persons (especially several other persons) are likely to be more exposed than others. Examples of such occupations include warehouse personnel receiving goods, or employees in shipping departments interacting with truck drivers, parcel service drivers, salespersons, cashiers and so forth.)

The US Occupational Safety and Health Administration (OSHA) recommends dividing job tasks into four risk exposure levels, as follows:



⁴ Refer to the following links for additional information on risk analysis: <https://apps.who.int/disasters/repo/5525.pdf> / <https://www.publicsafety.gc.ca/cnt/rsrcs/pblctns/ll-hzrds-sssmnt/index-en.aspx#step3>

Very High Exposure Risk Group

- This includes workers with high potential for exposure to the virus or those who may be in close proximity to suspected sources of the virus, including:
 - Public healthcare workers and first responders
 - Company medical personnel or auxiliaries who receive and treat patients (workers) in the company’s clinic
 - Medical transport workers (for instance, ambulance drivers) who move potentially or actually infected people

High Exposure Risk Group

- Worker accommodation or transport service providers
- Personnel investigating work-related fatalities and incidents
- Workers in contact with the general public

Medium Risk Exposure Group

- People with frequent or close contact (within 2 meters) with other workers at the work place
- Workers who have been in close contact with travelers who are coming from places with widespread COVID-19 transmission

Lower Exposure Risk Group

- People in jobs that do not require contact with people known to be, or suspected of being, infected with COVID-19 nor require frequent proximity (less than 2 meters) with the general public
- Workers who have minimal occupational contact with the public or other coworkers

Note that irrespective of the nature of the worker’s occupation, any worker who lives in the same accommodation as a person who has tested positive for coronavirus is considered to be at High Exposure.

Note also that because some people who are infected with COVID-19 are asymptomatic, from an occupational health standpoint all persons should be considered to be potentially infected, unless shown not to be infected.

TASK 4: DEFINITION OF CONTROLS, RESOURCES AND EMERGENCY RESPONSE

Once the main risks have been listed, evaluated, and prioritized as part of Task 3, the next step in Task 4 is to define and describe the basic steps and activities that the company must take to reduce the identified risks in order to ensure business continuity. This can be done by listing controls, resources, and mitigations for each one of the identified risks.

In order to facilitate the process of defining controls and emergency responses in a consistent manner with each of the identified risks, it is suggested that controls and emergency measures be organized using the same four OSHA-recommended exposure groups described above. The following table shows an example of a list of main risks related to the COVID-19 pandemic (general perspective) with their respective *suggested* control measures for each group:

Main Risks Identified	Possible Control Measures
WORKERS	
General risk of exposure to COVID-19	<ul style="list-style-type: none">• Information Dissemination: Provide COVID-19 related information⁵ through awareness campaigns, training, or the establishment of specific communication channels (for example, WhatsApp groups or email).• Isolation: Ask sick or potentially infected workers to stay at, or work from, home. Encouraging workers to stay at home if they report symptoms of COVID-19 may require awareness-raising efforts, as well as brief medical questionnaires, and revisions to company sick-leave policies.

⁵ Refer to the [Interim Advice for IFC Clients on Supporting Workers in the Context of COVID-19](#)

	<ul style="list-style-type: none"> • Cough hygiene: Stress the technique that one should cough into the elbow or sleeve, not the hand. • Social distancing: Require individual separations and limit gatherings. • Hand sanitation: As with cough hygiene, inform the workforce on the proper hand washing technique⁶ and provide adequate facilities. • Cleaning and disinfecting: Determine whether more thorough cleaning/disinfecting of the workplace needs to be undertaken, and ensure that appropriate cleaning supplies are available. • Food preparation: Provide specific protocols for cleaning and disinfecting food preparation facilities. Prohibit kitchen staff from reporting to work if they experience COVID-19 symptoms.
<p>Risk of contagion inside the workplace</p>	<ul style="list-style-type: none"> • Ensure that adequate occupational health and safety (OHS) measures are implemented according to the risk level defined under “Classifying Employees Exposure to COVID-19” above. • Organize workplaces to enable workstations to be not less than 2 meters apart. Where this is not possible, consider setting up physical barriers. • Ensure use of PPE according to the potential level of exposure. • Cancel non-essential visits of people to any company facilities. • Define protocols for receiving visitors at the company’s facilities. • Allow only essential visits. • Prepare a work-from-home policy, limiting as much as possible the number of employees required on-site. • Mandate the use of face masks for personnel interacting with people, whether from the company or from the community, the public or any other external personnel. • Where appropriate, limit the access of people from the community and general stakeholders (they may communicate via e-mail or by telephone with their contacts).
<p>OPERATIONS</p>	
<p>Lack of decision making due to senior management becoming ill</p>	<ul style="list-style-type: none"> • Define procedures for delegation of authority during a possible pandemic situation. • Update and make available the employees contact list (cell phone, home phone, email), including contractors and subcontractors. • Designate responsible and alternate decision makers within each site/area.
<p>Business disruption due to poor communications</p>	<ul style="list-style-type: none"> • Communicate openly with your customers about the status of your operations, what protective measures you’ve implemented, and how they (as customers) will be protected when they visit your business. • Define means of making emergency communication with employees, partners, and clients.

⁶ Proper hand-washing techniques: (i) wet hands with water; (ii) apply enough soap to cover all surfaces; (iii) thoroughly wash all parts of hands and fingers up to the wrists, rubbing hands together for at least 20 seconds; (iv) rinse hands with water and dry thoroughly with paper towels; and (v) use paper towels to turn off the faucet before discarding the towels in the waste receptacle.

	<ul style="list-style-type: none"> • Keep grievance communication channels open and continue addressing and responding to worker complaints. Provide a confidential means for workers to raise issues, such as a nominated individual contactable via secure phone or email, for stakeholders at risk of retaliation.
Insufficient people to run normal operations	<ul style="list-style-type: none"> • Consider changing/adapting working shifts. • Plan for a total, partial, temporary, or permanent shutdown of equipment, always ensuring that processes and units are operating within safe limits. • Evaluate if the process can be engineered to be safely operated with fewer personnel. • Monitor absenteeism and adjust plans for how your business will operate if absentee numbers increase.
Workers can't reach the site (transit limitations or government regulations)	<ul style="list-style-type: none"> • Evaluate how essential personnel can be transported to the site. • Obtain necessary transit authorizations and permits for essential personnel, their backups, and supports. • Organize shifts considering late starts or delays. • Coordinate regularly with government officials to receive updated information about increasing controls and lockdowns.
SUPPLY CHAIN	
Disruptions in the supply chain	<ul style="list-style-type: none"> • Adjust the process to adapt to different than normal delivery times and quantities of products, supplies, and raw materials. • Identify essential and critical elements within the company supply chains (for example, raw materials, suppliers, subcontractor services/products, and logistics) required to maintain business operations. • Obtain information from suppliers about any current or expected production declines that may cause delays in fulfilling orders of critical infrastructure supplies. • Explore other sourcing options as a contingency plan. • Identify alternative transport plans for workers and materials in case of road congestion, trucking resource shortages, government-imposed shutdowns, and traffic restrictions. • Ensure you have adequate supplies of inventory for a sustained period. • Diversify your distributor sources in the event one supplier cannot meet an order request.
Insufficient stock of essential items	<ul style="list-style-type: none"> • Check your maintenance contracts to ensure they provide for regular coverage during the pandemic. • Establish a basic stock of essential spare parts, tools, materials, and equipment. • Establish a basic safety stock of soap, detergents, disinfectants, sanitizers, N95 respirators, masks, gloves, and any required PPE.

COMMUNITY

Increased security threats	<ul style="list-style-type: none"> • Assess new COVID-19-related security risks relating to those within and outside the project site. • Adapt the company’s internal security arrangements to the new conditions. • Develop procedures to be used in case of any civil unrest, ensuring alignment with local regulations, company requirements, and the “Voluntary Principles on Security and Human Rights.”⁷ • Coordinate with local authorities the protection of essential assets that could be under increased security threats. • Ensure appropriate conduct from security personnel toward workers and affected communities.
Deterioration of relations with the community	<ul style="list-style-type: none"> • Keep grievance communication channels open, and continue addressing and responding to complaints, claims, and information requests. Provide confidential means for communities to raise concerns, such as encrypted app communication, for stakeholders at risk of retaliation. • Evaluate if the company can modify its social investment initiatives or establish new community support programs to make contributions to the affected community. • Consider supporting organized prevention or relief efforts and campaigns from government authorities, nongovernmental organizations (NGO), or other organizations dealing with the impact of COVID-19 in the community. • Promote communications via radio, social media, or other Internet-based means.
Risk of pollution	<ul style="list-style-type: none"> • Dedicate resources to contain sources of environmental pollution and control releases that may harm communities and the environment. • Include in the list of essential equipment those items used to run wastewater treatment plants, scrubbers, filters and any other pollution prevention units that if left unattended will spill or release toxic wastes or pollutants into the environment. • Ensure the timely collection of solid and liquid waste from the site. Check that disposal mechanisms follow local regulations. • Reduce inventories of hazardous substances. • Increase supervision of any tank or vessel containing hazardous substances.
General disruption	<ul style="list-style-type: none"> • Establish a budget to implement all the mitigations and controls. • Contact your insurance agent to review your policy to understand precisely what you are and are not covered for in this situation. • Contact local authorities periodically to assess the rapidly changing situation and adapt accordingly.

⁷ See <https://www.voluntaryprinciples.org/>

ANNEX 1. SOURCES AND USEFUL LINKS WHEN PREPARING A COVID-19 EPRP:

NFPA 1600 Standard on Disaster/Emergency Management And Business Continuity/Continuity Of Operations Programs, 2016 Edition <https://www.nfpa.org/codes-and-standards/all-codes-and-standards/list-of-codes-and-standards/detail?code=1600>

EU OSHA COVID guidance for the workplace https://oshwiki.eu/wiki/COVID-19:_guidance_for_the_workplace#See

ISO 22320:2018 Security and resilience — Emergency management — Guidelines for incident management <https://www.iso.org/standard/67851.html>

US OSHA (2020) Preparing Workplace for Covid-19 <https://www.osha.gov/Publications/OSHA3990.pdf>

US OSHA (2020) Infectious Diseases Website https://www.osha.gov/SLTC/healthcarefacilities/infectious_diseases.html#cdc_guidelines

WHO getting your workplace ready for Covid-19 <https://www.who.int/docs/default-source/coronaviruse/getting-workplace-ready-for-covid-19.pdf>

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Disclaimer: This document contains advice intended to assist IFC clients in responding to the COVID-19 pandemic. Clients should also refer to COVID-19-related information and recommendations from the World Health Organization (WHO) and other specialized international health and disease control organizations, as well as information from local, regional, and national governmental health authorities, noting that such recommendations are subject to change. Relevant information may also be available from international organizations within clients' business sectors. This document is not intended to be exhaustive, and it provides generic and general information rather than sector-specific guidance. Clients in high-risk sectors should refer to sector-specific procedures and standards.

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2121 Pennsylvania Avenue, N.W.
Washington D.C., 20433 USA
Internet: www.ifc.org*