

2 July 2020

Dear Valued Member

## **Cleaning, decontamination and the use of disinfection tunnels in workplaces in the context of COVID-19**

With the further relaxation of the lockdown levels in the country recently, several procedures have been adopted to ensure workplace readiness for these changes. One such measure has been that workplaces need to be “deep cleaned” before employees return to these workplaces. There has also been confusion surrounding the requirements for disinfection, following the identification of one or more employees testing positive at a workplace. Many Members believe that the use of fogging and fumigation in these circumstances is appropriate. This is not the case.

It should be noted that the disinfection procedure, which includes fogging, fumigation and deep cleaning, is not a requirement for areas that were **unoccupied for more than one week**. According to The Centre for Disease Control (CDC) guidelines, together with certain World Health Organisation (WHO) reports on cleaning and disinfecting, no cleaning and disinfection is required for areas if the person that was diagnosed with COVID-19 did not visit or use the workplace for more than seven days. Although the cautious approach to deep clean is always advisable in these times, there is currently no legal requirement **to deep clean or implement any other form of cleaning** in areas that were unoccupied for more than seven days.

The misconception of ‘deep cleaning’ procedures may have emanated from the requirement published in the COVID-19 Disease: Infection Prevention and Control Guidelines of the Department of Health that stated *“cleaning the environment is paramount”* and the procedure to deep clean the environment is described in the Practical Manual for Implementation of the National Infection Prevention and Control (IPC) Strategic Framework. However, this requirement is primarily for a specific area in the work environment that has been occupied by a person who was diagnosed with COVID-19 to enable reoccupation of the affected area as soon as possible for activity to resume.

Deep cleaning involves cleaning walls, ventilation shafts and grills and storage areas, floors, windows, ceilings, etc. in all clinical and non-clinical areas. In areas where a person was tested positive for COVID-19, an incident-based risk assessment approach, as specified in the Department of Employment and Labour’s Direction and the Department of Health’s Guideline, need to be followed.

If the individual merely ‘passed through’ the workplace without touching anything and without spending much time in face-to-face communication with other employees, then simple manual surface cleaning measures would be appropriate. However, if the individual spent a considerable amount of time in the workplace, touched and handled many objects, equipment and surfaces and had close contact with several fellow workers, then more comprehensive manual surface cleaning of the environment would be warranted. It must be understood, however, that **The Department of Health does not endorse or require ‘deep cleaning’ that involves fumigation, demisting or fogging**, nor would the Department of Health require such a ‘certificate of cleaning’.

With regards to disinfection tunnels and spray booths concerning COVID-19 in the workplace, the National Department of Health (NDOH), as well as the World Health Organisation (WHO), has confirmed that a disinfection tunnel or the spraying of a person with a disinfectant is NOT recommended as these procedures

have not been primarily designed for humans. They are rather used in industrial operations and as such are deemed ineffective. Furthermore, there is a high likelihood that they may also cause unintended health problems in individuals subjected to such practices.

The use of tunnels or other physical structures (booths, cabinets, gates) with disinfection aspersion or spray devices are not recommended for use on humans for the following reasons:

- Products used in disinfection tunnels and similar structures pose harmful effects to human health, especially to respiratory tract and skin;
- Tunnels or other physical structures with disinfection dispersion or spray devices are not effective for inactivating viruses present in the respiratory tract or on the skin;
- The use of tunnels or other physical structures with disinfectant dispersion or spray devices can lead to further unintended virus dispersion;
- Industrial and medical-grade disinfection devices routinely require the use of personal protective gear and strict safety measures by the applicator, which is not currently how these methods are being used for the layperson subjected to these practices; and
- The use of these structures is likely to induce a false sense of security among those being sprayed leading to non-compliance of the most important general safety precautions of wearing face masks, social distancing and practising personal hygiene.

The promotion of the disinfection tunnels and spray booths are often driven by fractured knowledge, mixed messages, profit-driven advertising campaigns based on half-truths and misinformation on risk perception via social media. Currently, commercial businesses are capitalising and marketing costly disinfection tunnels along with the assertion that they have adjusted their products to be more “person friendly”. This, however, does not address the well-known fact that the primary source of the virus and its main route of transmission, which is droplet spread, is generated from the upper and lower respiratory system. Therefore many South African occupational health and public health experts have been emphatic that the use of disinfection structures should be strongly discouraged.

The RMI cautions its Members to remember that the installation and application of disinfection tunnels and spray booths, often at great cost, is not a legal requirement. Members must continue to apply the protocols advised by the RMI in its published Business Continuity Plan and Risk Adjustment Strategy.

