



Letter of Instruction

March 26, 2021

To: All owners, operators and persons responsible for food premises¹(e.g., restaurants, bars, cafes, food trucks, concession stands, banquet halls, etc.) with indoor and/or outdoor dining areas within Renfrew County and District

Re: Renfrew County and District Health Unit Letter of Instruction for food premises regarding the mandatory physical distancing of separate households and collecting patron information

The Province of Ontario has issued regulations under the Reopening Ontario (A Flexible Response to COVID-19) Act, 2020 (ROA). The ROA Regulations applicable to Renfrew County and District Health Unit (RCDHU) require all persons responsible for a business or organization that is open to operate the business or organization in compliance with the instructions of public health officials including any advice, recommendations or instructions on physical distancing, cleaning or disinfecting. The following instructions issued by Dr. Robert Cushman, Acting Medical Officer of Health for RCDHU, are intended to supplement the Regulations.

COVID-19 continues to be present in Renfrew County and District (RCD); variants of concern (VOCs) have been identified in neighbouring health unit counties. VOCs are associated with a higher risk of transmission.

There is a heightened risk of increased cases associated with serious outcomes from COVID-19 for the residents of RCDHU through community transmission. The key risk factors associated with the potential transmission of COVID-19 include: ³

- close contact
- closed spaces
- crowded places
- forceful exhalation

To minimize VOC spread in Ontario communities, the lockdown evidence and experiences from other jurisdictions demonstrate that any currently implemented public health measures should be intensified. ⁴ Physical distancing plays a key role in reducing the risks associated with crowded places and has been proven to limit COVID-19 transmission. O. Reg. 364/20: Rules for Areas in Stage 3, Schedule one, Section 3.1 (4) states:



Every member of the public in a place of business or facility that is open to the public shall maintain a physical distance of at least two metres from every other person, except from their caregiver or from members of the person's household.

To assist with the implementation of this requirement, I am issuing this Letter of Instruction to all food premises with indoor and/or outdoor eating and drinking areas that are open to the public within RCDHU. These instructions are being provided pursuant to schedule 1, Section 2 (2) or O. Reg. 364/20: Rules for Areas in Stage 3 made under the *Reopening Ontario (A Flexible Response to COVID-19) Act, 2020, S.O. 20202, c. 17*.

These instructions are being issued to provide clarity and help ensure that the provincial legislation is being followed locally. A single table does not typically allow for those seated at the table to maintain two metres from other. In order to comply with provincial legislation, these instructions will cause restrictions for those who can be seated at the same table.

Effective April 02, 2021, I am instructing all persons responsible for a food premises with indoor and/or outdoor dining areas open to the public located within Renfrew County and District to implement the following measures:

1. Obtain and record the following information for **every patron** that enters an indoor or outdoor eating or drinking area in/at the premises, other than patrons who briefly enter the area to place, pick up, or pay for a takeout order:
 - i. first and last name
 - ii. telephone number, email address (if possible) and municipality of residence, or alternate contact information
 - iii. date of attendance; time of arrival and time of departure
 - iv. table number or specific location of table at the establishment
 - v. [attestation](#) that the patron is not experiencing COVID-19 symptoms, excluding those related to a chronic or other condition
 - vi. verbal attestation that the patron is:
 - a) joining a table with only their own household members; or
 - b) joining a table only with one other household, if they live alone;
or
 - c) joining a table with another household, if they are a caregiver



(essential for maintaining mental or physical health) for someone in that household.

2. Do not serve, seat or permit patrons to enter indoor or outdoor dining areas who do not provide the information required in paragraph 1 above.
3. Retain the records and information required above for a period of at least one month and ensure the records are stored and destroyed in a secure manner to preserve privacy of patrons.
4. Disclose the records and information required above to a medical officer of health or inspector under the [Health Protection and Promotion Act](#) **immediately** upon request, or as otherwise required by law.
5. Seat a maximum of six (6) people at one table. More than six people may be seated together at a table if they are all members of the same household, a member of one other household who lives alone or a caregiver for any member of either household. Consult Regulation 364/20 for Orange zone requirements.
6. Configure tables to ensure that patrons at different tables maintain a distance of two (2) metres while seated (back of chair to back of chair) or are separated by an impermeable barrier.
7. Provide alcohol-based hand rub that is approved by [Health Canada](#) at every entrance and exit to/from the establishment and eating areas (e.g. patios) and post signage asking patrons to sanitize their hands upon entry and exit.

The actions we are asking food premises to take as outlined in the Letter of Instruction will help further protect our community by reducing close contact of unmasked non-household members and ensuring that sufficient information for the purpose of contact tracing can be provided, when required. This Letter of Instruction will be enforced by Public Health Inspectors and other Provincial Offences Officers responsible for the enforcement of the **Reopening Ontario Act**. Failure to comply is an offence under the Reopening Ontario Act for which you may be charged. In order to help with compliance, we have developed sample templates for recording the required patron information.

Thank you in advance for your compliance and cooperation. RCDHU Public Health Inspectors are available to support food premises with implementation of these instructions. If you have questions or concerns related to implementation, please contact our office at (613) 732-3629 ext. 505.



Renfrew County and District Health Unit

"Optimal Health for All in Renfrew County and District"

Please note that the Letter of Instruction will be posted on RCDHU's website at: <https://www.rcdhu.com/novel-coronavirus-covid-19-2/> under accordion number six-news, fact sheets and additional resources.

These instructions remain in effect until rescinded by the Medical Officer of Health of RCDHU or if the requirements in this letter become less stringent due to a change in legislation.

Sincerely,

Dr. Robert Cushman
Acting Medical Officer of Health
Renfrew County and District Health Unit

¹ Health Protection and Promotion Act, R.S.O. 1990, c. H. 7. Accessed February 25, 2021 at <https://www.ontario.ca/laws/statute/90h07>

² Province of Ontario. COVID-19 response framework: keeping Ontario safe and open. February 19, 2021. Accessed February 25, 2021 at <https://www.ontario.ca/page/covid-19-response-framework-keeping-ontario-safe-and-open#prevent>

³ Ibid,

⁴ Public Health Ontario. Evidence on Public Health Measures Required for Rapid Control of Variants of Concern. February 16, 2021. Accessed February 25, 2021 at <https://www.publichealthontario.ca/-/media/documents/ncov/phm/2021/02/eb-public-health-measures-for-voc.pdf>