

Balancing Food Safety and Organic Requirements for: Worker Training and Health and Hygiene

January 2018



Introduction

The National Organic Program has no training or other requirements for workers. When asked about this, one organic certifier said “Workers! What are those?” only half in jest. This fact sheet summarizes what organic farmers will have to do for FSMA on training workers, worker health and hygiene, and visitor health and hygiene if they are fully covered by the Produce Rule.



Training for Owners or Supervisors

At least one supervisor from the farm (could be the owner) must complete an FDA-approved training such as the Produce Safety Alliance (PSA) training, which consists of 8 hours of power point slides and gives the attendee a certificate. Someone on the farm must be designated to ensure compliance with the FSMA Produce Rule.

Training for the Farm’s Workers

Workers must be trained at least once a year. Any newly hired worker must be trained upon starting. More training is required if the farm is not complying with the Produce Rule standards. Temporary, part-time, seasonal, and contract workers must all be trained. If you use farm labor contractors you must receive written assurance from them that their workers have been trained.

Training for workers must include:

- Principles of food hygiene and food safety
- Recognizing symptoms of a health condition that is reasonably likely to result in contamination of covered produce or food contact surfaces with micro-organisms of public health significance
- The standards established by the FDA in the Produce Rule that are applicable to the employee’s job

Harvest workers must receive special training:

- Recognizing covered produce that must never be harvested, such as:
 - Never harvest produce contaminated with feces
 - Never pick up dropped produce from the ground
- Inspecting harvesting containers or equipment to make sure they are clean
- Correcting or reporting problems with harvesting equipment or containers

All training must be documented and include:

- The names of those trained
- Date of training
- Topics covered
- Training is to be provided in the workers’ native language. Since workers may not read, visuals such as pictures or videos are best.

Required Practices for Workers on the Farm

Practices that workers must follow:

- Maintain personal cleanliness
- Avoid contact with non-working animals
- Minimize contamination from working animals
- If using gloves, maintain them in a sanitary state or replace them
- Remove or cover hand jewelry
- Do not eat, chew gum, or use tobacco in produce areas
- Wash hands with soap and water and dry hands with single-use items:
 - Before starting work
 - Before putting on gloves
 - After using toilet
 - Upon return to work after breaks
 - After touching animals or manure
 - After eating or smoking: The biggest concern is failing to wash hands after using the toilet or after smoking or eating
- Notify supervisor if they are ill: Whether the workers report being sick or not, you cannot let ill workers contaminate covered produce or food contact surfaces. You must exclude them. You should create a farm policy for this.



Simple portable handwashing station



Photo by Mark Kogut

Farm Requirements for Field Sanitation

The farm must provide adequate, readily accessible toilet facilities and a handwashing station must be in close proximity to the toilet. These can be in a house if it is close enough to the work.

- Toilet paper should be deposited in the toilet
- Toilets should be clean and well-stocked and inspected daily
- Workers must wash their hands after using the toilet.
- Water used for handwashing must have no detectable generic *E. coli*
- GAPs generally require record-keeping for:
 - Cleaning and stocking toilets and hand washing stations
 - Worker injury and illness reporting

Visitors and Health and Hygiene

- You must make visitors aware of policies and procedures to protect covered produce and food contact surfaces from contamination by people and take all steps reasonably necessary to ensure that visitors comply with such policies and procedures.
- You must make toilet and handwashing facilities accessible to visitors.

Meet visitors and tell them where the toilets and handwashing stations are. They must follow the handwashing requirements. Sick visitors are not allowed in areas where they could contaminate produce.

Frequently Asked Questions

Do Qualified Exempt farms have to take a PSA training?

No, only farms fully covered by the Produce Rule are required to take this training.

How do I minimize contamination from working with animals?

If workers are going to work with animals and then work with produce, they should use protective clothing that can be removed after working with the animals, such as aprons, overalls, or boots. The Produce Rule also requires workers who work with animals to wash their hands thoroughly as soon as practical before dealing with produce, and this applies to any worker who touches an animal.

What are the symptoms of a health condition that is reasonably likely to result in contamination of covered produce?

Nausea, vomiting, diarrhea, fever, jaundice. Frequent trips to the toilet may be an indicator.

If there is an ill worker on the farm, is she allowed to do other jobs on the farm where she would not contaminate covered produce?

Yes. The farm needs to decide their policy on this and either have a policy where all sick workers must remain home until well or have a policy that ill workers can still work on tasks where they do not touch crops or food contact surfaces, such as packaging materials, packing tables, and knives. If a worker has symptoms listed above then prohibiting a worker from working is the option that reduces risk the most for the farm.

Does FSMA require the use of gloves?

No. Bare hands can be cleaned. If gloves are used, FSMA requires that they be kept clean or replaced.

How is a “readily accessible toilet facility” defined by FSMA?

FSMA defers to the OSHA standards, which are that one toilet and one hand-washing station must be provided for every 20 workers within a ¼ mile walk of the working area, or at the point of closest vehicular access if geography precludes siting the facilities near the working area

Can a toilet be a pit latrine and/or composting toilet?

This question was submitted to the FDA’s Technical Advisory Network (TAN) and their response was:

The Standards for the Growing, Harvesting, Packing, and Holding of Produce for Human Consumption (80 FR 74353) (21 CFR Part 112) do not specify the type of toilets a farm must use; however, toilets are required to meet the requirements of 112.129. Additionally, as the inquirer mentioned, sewage must be managed in a manner that prevents contamination into the fields, on food and food contact surfaces, and in structures that hold or convey agricultural water.

Part 112.129 of the regulation states that toilet facilities must be accessible to workers, located in a location that will not contaminate produce or water, be accessible for cleaning, be supplied with adequate toilet paper, and have a sanitary disposal of waste and toilet paper. Additionally, a hand-washing station must be located close to the toilet.

Conclusion

FSMA’s Produce Rule potentially presents fully-covered organic farmers with a whole new set of duties related to training workers and ensuring that health and hygiene practices are followed. Workers must be trained at least annually and harvest workers must receive special training, while one representative of the farm must attend a PSA training. Field sanitation requirements are the same as existing OSHA requirements, but FSMA has a long list of practices that workers must follow. Written records must be kept to document several of these requirements—for more details on recordkeeping, see the fact sheet on recordkeeping requirements for fully covered farms.

Resources

1. University of Minnesota Agricultural Health and Safety Program. How to build an affordable and portable handwashing station: https://safety.dl.umn.edu/sites/g/files/pua3146/f/media/handwashing_station_instructions.pdf
2. Chico State University's EasyGAP Employee Hygiene video. Access here: http://www.csuchico.edu/easygap/produce/employee_hygiene1.shtml
3. Washington State Department of Agriculture GAP FSMA and On-Farm Food Safety Planning Video. Access here: <https://www.youtube.com/watch?v=UscCS6Ya6ts>

References

1. The FDA states the training requirements in Subpart C of the Federal Regulation of Standards for Growing, Harvesting, Packing, and Holding of Produce for Human Consumption in parts §112.21-112.30. Full text found at: <https://www.federalregister.gov/d/2015-28159/p-2112>
2. The FDA states the health and hygiene requirements in Subpart D of the Federal Regulation on Standards for Growing, Harvesting, Packing, and Holding of Produce for Human Consumption in parts §112.31-112.33. Full text found at: <https://www.federalregister.gov/d/2015-28159/p-2129>
3. The FDA states the harvest requirements in Subpart K of the Federal Regulation on Standards for Growing, Harvesting, Packing, and Holding of Produce for Human Consumption and discusses dropped Produce 112.114. Full text found at: <https://www.federalregister.gov/d/2015-28159/p-2272>
4. The FDA states the toilet requirements in Subpart L of the Federal Regulation on Standards for Growing, Harvesting, packing, and Holding of Produce for Human Consumption in part §112.129. Full text found at: <https://www.federalregister.gov/d/2015-28159/p-2314>
5. Federal OSHA field sanitation requirements are at the United States Department of Labor website: https://osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10959
6. California OSHA field sanitation requirements are at: CCR Title 8. Subchapter 7. Group 3. Article 13. §3457 Accessed at: <https://www.dir.ca.gov/title8/3457.html>

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This material is based upon work that is supported by the National Institute of Food and Agriculture, U.S. Department of Agriculture, under award number 2015-38640-23779 through the Western Sustainable Agriculture Research and Education program under subaward number EW16-015. USDA is an equal opportunity employer and service provider. Any opinions, findings, conclusions, or recommendations expressed in this publication are those of the author(s) and do not necessarily reflect the view of the U.S. Department of Agriculture.
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