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.

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.
**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.
Acknowledgments

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Resources


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
