

## AT A GLANCE: KEY POINTS IN THE PRODUCE SAFETY RULE DRAFT GUIDANCE

### CHAPTER 3: HEALTH AND HYGIENE (SUBPART D)

#### What is the goal of this chapter?

The goal is to help farm personnel understand how they can use hygienic practices to prevent the contamination of produce and food contact surfaces.

*References to “you” in this document (as well as in the Produce Safety Rule and draft guidance) mean the owner, operator, or agent in charge of a covered farm that is subject to some or all of the requirements of the rule. In addition, unless otherwise specified, we’re only talking about produce covered by the rule.*

#### Why are hygienic practices important?

Unhygienic practices by farm personnel have contributed to some outbreaks of foodborne illness. A person can carry and transmit pathogens (disease-causing microorganisms) on their skin and in their gastrointestinal and respiratory tracts, and unhygienic practices when handling produce or food contact surfaces could potentially contaminate produce. There is also the potential for produce contamination if a worker comes in contact with contaminated surfaces, such as unclean surfaces, the floor, trash, or animals, and then handles produce.

People can spread communicable diseases even if they don’t show symptoms.

#### Who does this most affect?

Farm personnel who work in any operations that could result in the contamination of produce and those who supervise such activities. This chapter also outlines precautions for farm visitors.

#### What kind of health conditions is FDA concerned about?

An applicable health condition typically is a communicable illness (can be passed on from one person to another) that presents a public health risk in the context of normal work duties. Symptoms of these conditions can include vomiting, diarrhea, abdominal cramps, sore throat with fever, jaundice (yellowing of the skin or eyes), and open sores or wounds. If farm personnel or visitors have these symptoms or conditions, they can make other people sick, and risk contaminating produce and food contact surfaces. You should make sure that you, your supervisors and responsible parties and workers can identify applicable health conditions.

Note that applicable health conditions do not include pregnancy, or non-communicable diseases, such as cancer, diabetes and high blood pressure.



**What are some requirements and recommendations that farm workers need to know?**

Farm personnel must be instructed to notify their supervisors or a responsible party if they have symptoms that indicate they may be sick. You should make sure that your workers who could contaminate covered produce or food contact surfaces can identify the symptoms of applicable health conditions. Some workers must receive training on the importance of health and personal hygiene, including recognizing the symptoms of a health condition that is reasonably likely to contaminate produce.

To help workers identify the symptoms of applicable health conditions and respond accordingly, you should:

- Train all personnel (not just those required to have training) on these conditions and how to identify them.
- Encourage personnel to be aware of contact with or exposure to individuals with symptoms.
- Identify who workers should notify, such as a supervisor, if they feel have symptoms of a communicable condition.

The Produce Safety Rule does not require or authorize farms to obtain medical records of personnel to verify their applicable health condition.

**What are some requirements and recommendations that supervisors need to know about applicable health conditions?**

Communication between supervisors and farm personnel has an important role in ensuring that workers are aware of and report any applicable health conditions. Supervisors and responsible parties should be able to recognize symptoms of concern and know when and how to exclude or reassign the affected workers. Supervisors and responsible parties who oversee the handling of produce or food contact surfaces must have the qualifications (through a combination of education, training and experience) to perform these duties.

Procedures should be in place to help supervisors make decisions about workers who appear ill or exhibit symptoms of an illness. The FDA Food Code ([www.fda.gov/foodcode](http://www.fda.gov/foodcode)) is a resource for information on potential approaches to situations when a worker's health is a potential hazard.

**Once a health condition has been reported, what is the farm required to do? And what are some recommendations for meeting those requirements?**

The rule requires farms to exclude a person who has an applicable health condition from working in operations that may result in contamination of produce and food contact surfaces until the worker has recovered.

Depending on the worker's condition, and the operations involved, measures to prevent contamination of produce could include temporarily assigning the worker to other duties, temporarily excusing them from work, or allowing the worker to continue with job duties after completing certain actions, such as bandaging a wound in a manner that prevents contamination.

If you are aware that an ill worker is likely to have contaminated produce or food contact surfaces, you must take steps to ensure that the produce is not distributed unless its safety can be reasonably assured, and you must take steps to prevent contamination of additional produce. Actions could include:

- Isolating the area and ceasing activities
- Isolating and holding any produce that could have been contaminated until its safety can be evaluated
- Disposing of the produce
- Cleaning, sanitizing or replacing the affected food contact surfaces

### **Can you give an example of what should happen when a worker gets sick on the job?**

A worker stationed at a packing belt suddenly feels sick and vomits on the produce in front of him. He should immediately tell a supervisor what happened. The supervisor, or another responsible party, should then ensure that activities in that area cease and must exclude the worker from working in any operations that may result in contamination of produce or food contact surfaces until the worker's health improves. A supervisor should also oversee the removal of the affected produce, and ensure other appropriate steps are taken, such as cleaning and sanitizing the food contact surfaces before the work area is used again.

### **What steps should I take to support compliance with hygienic practices requirements?**

Essentially, you should make sure that personnel know what hygienic practices are required and that these practices are part of how they routinely do their job. You could, for example, use signs, visual aids (e.g., posters), and verbal reminders to reinforce the importance of using hygienic practices. And this requirement isn't limited to workers who handle produce and work on food contact surfaces. For example, if workers who handle livestock enter an area that contains produce, you should make sure they understand that their clothes (including shoes) could transfer bacteria if they don't follow hygienic practices. These may include hand-washing or changing clothes or outerwear.

Supervisors or other responsible parties should observe farm personnel while they are doing their jobs and talk to them about hygienic practices. Supervisors or other responsible parties should be familiar with both farm procedures and regulatory requirements, and respond to correct any poor practices.

### **What hygienic practices by personnel who handle produce or food contact surfaces protect against the risk of contamination?**

*They must maintain adequate personal cleanliness.*

- Any exposed skin and clothing should be as clean as possible. Starting the day in clean clothes, and keeping fingernails trimmed while handling produce are among the recommended strategies.
- Clothing or outerwear may need to be changed as needed during the day. You should identify job duties in which a worker's clothing or footwear are likely to get dirty and establish procedures to protect against contamination of produce or food contact surfaces.

*They must avoid contact with animals while doing those jobs.*

- And they must take appropriate steps, including handwashing, to minimize the risk of contaminating produce as soon as possible after contact with working animals, such as a horse pulling a cart of produce during harvesting. (Chapter 5 of the draft guidance has more information about the risk of contamination from domesticated and wild animals.)
- If your farm uses working animals, there are several other ways you can minimize the risk of contaminating produce. For example, you could instruct personnel to complete activities involving produce or food contact surfaces before moving on to activities involving handling animals; you could also instruct workers not to handle produce or food contact surfaces at all while handling these animals.

*They must thoroughly wash their hands with soap and running water before starting work, before putting on gloves, after using the toilet, upon returning from a break or other absence, as soon as practical after touching animals or animal waste, and any other times when hands may have become contaminated.*

- Personnel should recognize situations in which hands may need to be washed, such as after handling non-food contact surfaces of equipment, objects that have touched the floor and waste containers.
- Antiseptic hand rubs, such as hand sanitizer, cannot be used to substitute for soap and water.

*Gloves, if worn, must be maintained in an intact and sanitary condition.*

- You should evaluate activities that involve hand contact with produce and determine whether gloves should be used. There are several factors to consider in your evaluation, such as the type of activity, glove type, and the likelihood for contamination of produce. Different types of gloves, or no gloves, may be appropriate.
- If reusable gloves are used, you should develop procedures for short- and long-term storage, cleaning and replacement.
- Personnel should understand your procedures for glove use.

*They must remove or cover hand jewelry that cannot be adequately cleaned and sanitized.*

*They must not eat, chew gum or use tobacco products in areas used for a covered activity.*

- However, drinking beverages is permitted in designated areas.

***For more information and examples, see the “Hygienic Practices” section in Chapter 3 of the draft guidance, specifically the subsection on required hygienic practices.***

**How do you take steps to prevent visitors from contaminating produce and food contact surfaces?**

Visitors to the farm, which could include customers, delivery personnel, and vendors, could enter areas where produce is grown, harvested, packed or held, and where there are food contact surfaces. There are required and recommended steps that can be taken to minimize the risk from visitors, even if a farm seldom has visitors.

- You should evaluate the different types of visitors on your farm (such as those visiting growing, harvesting, packing, or holding areas) and their interaction with the produce to determine appropriate approaches. You may want to develop specific procedures for different types of visitors. You may also choose, for example, to deny access to certain parts of the farming operation to visitors that appear sick.
- Visitors should be informed how their health and hygienic practices are important to the goal of protecting produce.

You must make visitors aware of the policies and procedures you have in place to protect produce and food contact surfaces from contamination by people.

- These could be, for example, verbal, written, or graphic instructions, including signs placed at strategic locations or handouts that outline health and hygiene policies.

You must let visitors know where the restrooms and hand-washing facilities available to them are located.

*For further explanation of the underlined words, see the [Key Terms Glossary](#).*

*The [draft guidance](#) contains more details and examples of FDA's recommendations and current thinking. It is recommended that you review the draft guidance for complete information.*