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COVID-19 GUIDANCE FOR SAFELY HARVESTING, PACKING AND HANDLING FRESH PRODUCE IN CALIFORNIA

California farmers are required by federal law to follow “Standards for the Growing, Harvesting, Packing, and Holding of Produce for Human Consumption”. These practices minimize microbial hazards, including bacteria, viruses, protozoa and parasites.

These standards and regulations include strict controls for employee hygiene, worker health and equipment cleaning and sanitation. Companies are required to provide training and to monitor and maintain records of compliance for all employees and visitors. Below is a summary of key industry and government requirements utilized by farmers to address proper hygiene and worker health practices.

Food Safety Modernization Act (FSMA)

The FDA’s produce safety regulations that are currently in effect nationwide, include the following measures to address health and hygiene:

- Prevent contamination of produce and food-contact surfaces by ill or infected persons,
- Instruct personnel to notify their supervisors if they may have a health condition that may result in contamination of covered produce or food contact surfaces.
- Use hygienic practices when handling (contacting) covered produce or food-contact surfaces, including, washing and drying hands thoroughly frequently and always after using toilet facilities.
- Controlling who has access to production areas – both in the field and in facilities. Visitors must follow the same hygienic practices as workers to prevent contamination of covered produce and/or food contact surfaces.
- Train farm workers who handle covered produce and/ or food-contact surfaces, and their supervisors, on the importance of health and hygiene.

Require farm workers who handle covered produce and/ or food contact surfaces, and their supervisors, to have a combination of training, education and experience necessary to perform their assigned responsibilities including establishing and maintaining hygiene, health, cleaning and sanitation programs.

Commodity specific guidelines

While the FDA Produce Safety Rule requirements came into effect just a few years ago, the produce industry has been leading in the development and implementation of good agricultural practices for over two decades. The first FDA GAP guidelines were published in 1998 followed by numerous commodity-specific guidelines by industry and FDA for leafy greens, green onions, melons, fresh culinary herbs, tomatoes, potatoes, mushrooms, berries, etc. All guidelines are based on established science and have been developed at the





request of the industry to enhance the safety of products and personnel. In California both leafy greens and cantaloupe industries have established marketing agreements to require strict compliance with guidance and participants are required to document and maintain records of compliance and are routinely and randomly audited by CDFA auditors. An example of the requirements for leafy greens is below.

- *Leafy Green Marketing Agreement (LGMA)- approved guidelines*

Over 90% of the leafy greens consumed in the U.S. are produced under the LGMA food safety programs in Arizona and California which include stringent requirements regarding the health and hygiene of employees working on farms and in fields.

Proper hygiene practices and policies include:

- Requirements for workers to wash their hands with soap and running water before beginning or returning to work, before putting on gloves, after using the toilet, as soon as practical after touching animals or any waste of animal origin, and at any other time when hands may have become contaminated.
- Requirement for workers' clothing to be clean at the start of the day and appropriate for the operation.
- If gloves are used in handling or harvesting lettuce/leafy greens, gloves are to be maintained in an intact and sanitary condition and replaced when they are no longer able to be maintained in this condition.
- Avoiding contact with any animals.
- Confinement of smoking, eating, and drinking of beverages other than water to designated areas.
- Prohibitions on spitting, urinating, or defecating in the field.

Worker health practices require the following:

- Workers with symptoms of infectious diseases are prohibited from being in the field and handling fresh produce and food contact surfaces.
- Workers with open cuts or lesions are prohibited from handling fresh produce and food contact surfaces without specific measures to prevent cross-contamination.
- Workers must notify a supervisor or other responsible party in the event of injury or illness.
- A policy describing procedures for handling/disposition of produce or food-contact surfaces that have come into contact with blood or other body fluids.
- The number, condition, and placement of field sanitation units as established by federal, state or local regulations, the accessibility of the units to the work area, facility maintenance, facility supplies [e.g., hand soap, water (use of antiseptic/sanitizer or wipes, as a substitute for soap and water, is not permitted), single-use paper towels, toilet paper, etc.], facility signage, facility cleaning and servicing, and a response plan for major leaks or spills. As toilet paper supplies have run low in many communities, it is important for farm operators to ensure that field sanitation units are fully stocked with toilet paper at all times.





Considerations for any additional guidance or communications

Stressing the use of current requirements associated with good hygiene and work health practices is the most effective way to address concerns related to COVID-19.

We recognize that some questions continue to arise regarding the virus' impact on the food supply chain. Although it is possible to transmit COVID –19 through nonporous surfaces, there is no scientific evidence that other coronaviruses [e.g., Middle East Respiratory Syndrome (MERS), Severe Acute Respiratory Syndrome (SARS)] have been transmitted through food or food packaging, and there have been no reports of coronavirus (e.g., MERS and SARS) transmission through food or packaging. Current food safety practices in effect adequately address all microbial (including viral and bacterial) contamination concerns.

The COVID-19 outbreak may potentially cause disruption to business operations. Therefore, increased vigilance in planning and preparing to prevent the spread of the virus is key to significantly minimizing potential impacts.

We must encourage farming operations to take actions to enforce sick worker policies and minimize operations disruptions associated with COVID-19 so we can avoid negative impacts to our food supply. Stressing the importance of current GAPs and GMPs to address concerns related to COVID-19 can effectively mitigate against coronavirus transmission.

Links to key information:

[FDA website updates](#)

[WG guidance for employers](#)

[WG updated related to food](#)

