

# THE COMMONWEALTH OF MASSACHUSETTS

EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS



## Department of Agricultural Resources

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### BULLETIN 2020-18

## FARM LABOR MANAGEMENT

### Considerations for Fruit and Vegetable Growers Related to Coronavirus & COVID-19

Agricultural businesses have been deemed [essential services](#) under Governor Baker's emergency order and are allowed to operate during the COVID-19 pandemic. MDAR is issuing a series of [guidance documents](#) to assist these businesses in performing this service safely. If you have concerns or suggestions please contact the MDAR Produce Safety Team at: [Michael.Botelho@mass.gov](mailto:Michael.Botelho@mass.gov) or via phone at: (508) 985-8751, or UMASS Agricultural Extension at: [lmckeag@umass.edu](mailto:lmckeag@umass.edu) or via phone at: (413) 545-1051.

#### Background

COVID-19 is the disease caused by the SARS-CoV-2 virus ("the novel coronavirus"). Symptoms can include fever, cough, and shortness of breath, and may appear 2-14 days after exposure. While the majority of COVID-19 illnesses are mild, it can result in severe and fatal illness, particularly in the elderly and among those with underlying health conditions. Federal and State agencies are working hard to better understand the virus, how to control its spread, and how to treat those infected. One of the key things we can all do is to limit and slow the spread of COVID-19 to provide time for this understanding to develop and to not overwhelm the medical system. Much more information is available at the [CDC Situational Summary page](#).

#### Foodborne Exposure to COVID-19

Currently, there is no evidence that transmission of COVID-19 occurs through food or food packaging. Unlike foodborne gastrointestinal (GI) viruses like norovirus and hepatitis A that often make people ill through contaminated food, SARS-CoV-2, which causes COVID-19, is a virus that causes respiratory illness. While the science is still developing about this novel pathogen, foodborne exposure to this virus is not currently known to be a route of transmission. The virus is thought to spread mainly from person-to-person. This includes between people who are in close contact with one another (within about 6 feet), and through respiratory droplets produced when an infected person coughs or sneezes. These droplets can land in the mouths or noses of people who are nearby or possibly be inhaled into the lungs. It may be possible that a person can get COVID-19 by touching a surface or object that has the virus on it and then touching their mouth, nose, or possibly their eyes, but this is not thought to be the main way the virus spreads. (*U.S. Food & Drug Administration, posted 3/17/20*). Please visit <https://www.fda.gov/food/food-safety-during->

[emergencies/food-safety-and-coronavirus-disease-2019-covid-19](#) for further information on COVID-19 and food.

## Farm Labor in Massachusetts

The Commonwealth of Massachusetts recognizes the critical role that local agriculture plays in assuring a safe and reliable food supply. Governor Baker included farms in the list of [essential businesses](#) that provide essential services and workforces to the Commonwealth. As we each look to control the spread and impact of COVID-19, there are many questions arising around the risks associated with workers on farms. This guidance document outlines best practices to maintain the health and safety of farm employees and reduce the impact of COVID-19 related illnesses on farms in the Commonwealth.

Please remember simple steps can help stop the spread of this and other respiratory viruses. All farm employees should:

1. Wash hands often with soap and water for at least 20 seconds. If soap and water are not available, use an alcohol-based hand sanitizer containing at least 60% alcohol. If hands are visibly dirty, handwashing must occur as dirt will reduce the efficacy of the hand sanitizer.
2. Avoid touching their eyes, nose and mouth particularly with unwashed hands.
3. Avoid close contact with people who are sick.
4. Stay home when sick.
5. Cover coughs or sneezes with their elbow or a tissue, then throw the tissue in the trash; wash hands afterwards.
6. Clean and disinfect frequently touched objects and surfaces.

Signage reminding workers about how to [stop the spread of germs](#) is available in many languages [from the CDC](#) and must be displayed prominently in work spaces.

## SOCIAL DISTANCING AND WORKER HYGIENE

### 1. Social distancing on farms, pack-houses and farm stands

While farms are designated as essential, they are required to follow social distancing protocols for workers in accordance with [guidance from the Massachusetts Department of Public Health](#) and CDC for social distancing. Farms should continue to enforce social distancing of farm employees, and the isolation of possible illness in work crews, by adopting the following practices:

- a. Develop a plan for the monitoring, isolation and response to possible COVID-19 illness or exposure on the farm.
- b. Strongly encourage farm workers who are sick to notify farm management that they are ill and to stay home.
- c. Verify that staff are free of visible illness or symptoms and are sent home to seek medical care if presenting with symptoms.

- d. Limit contact between workers by increasing the distance (at least 6' if possible) and limiting the duration of contact between them. Limit the number of staff allowed in an area at one time.
- e. Consider creating teams or cohorts of employees that always work together in the same shifts, to limit possible exposure across your workforce.
- f. Stagger breaks and lunch periods and set up areas for these activities in a way that will prevent gathering of groups and maintain social distancing requirements between staff. Gatherings are currently required to be fewer than 10 people.
- g. Avoid having staff travel together in the same vehicle.
- h. Restrict access to the farm, pack-house, greenhouses and other farm infrastructure from outside visitors. Visitors who must visit the farm should be reminded of social distancing requirements, have limited access to farm areas where staff are working, and should follow the same hygiene requirements as workers, such as hand washing and wearing face coverings.
- i. Provide training to farm staff on social distancing and hygiene requirements, sick leave protocols, and recognizing signs of illness. Training should be provided in a language appropriate for the trainee.
- j. Use signage, verbal reinforcement and monitoring of staff to ensure that social distancing guidance and farm protocols are clearly understood and adopted.

## 2. The use of face coverings/masks for farm employees in Massachusetts

Masks and cloth face coverings can help prevent transmission of the virus from asymptomatic carriers and protect farm employees. Farm managers should be aware of the difference between respirators, masks and face cloth coverings by reviewing the [FDA fact sheet](#) developed for their use in the Food and Agriculture Sector during the Coronavirus Disease (COVID-19) Pandemic.

The ability for farms to obtain respirators or surgical masks (n95) is currently limited due to increased demand and prioritization for first responders and health care workers to obtain the supply of these items when available. As an alternative, properly constructed cloth face coverings can serve as an effective barrier for the disbursement of respiratory droplets from an individual and can minimize transmission. Farms should require the use of face coverings or masks by farm staff and support their use by implementing the following minimum requirements:

- a. Require Farm employees to wear masks or face coverings at all times when in close proximity to one another (within 6'), including in fields and pack houses and while being transported in farm vehicles to and from work sites and housing locations.
- b. Make face coverings available for farm staff and monitor their use. Reusable cloth face coverings should be changed out or laundered regularly, and at least before each daily use.
- c. Follow [CDC guidelines](#) for proper use, construction and handling of cloth face coverings. These include:
  - i. Cloth face coverings should fit snugly but comfortably against the side of the face and be secured with ties or ear loops.

- II. Home-constructed cloth face coverings should include multiple layers of fabric and allow for breathing without restriction.
- III. Cloth face masks must be able to be laundered and machine dried without damage or change to shape.
- d. Ensure that proper training is provided for farm employees on the proper construction, usage, storage and laundering of face cloth coverings.
- e. Surgical masks and respirators are not recommended to be worn at this time by farm employees in Massachusetts (unless required for a specific task such as pesticide mixing and application) since they need to be reserved for health care workers and first responders.

### 3. The use of gloves for farm employees in Massachusetts

Farm staff can utilize gloves according to the farm's established protocols while harvesting, sorting and packing fresh produce in the field and in pack houses and should have a glove use policy in place to ensure gloves are maintained in adequate sanitary condition. If using gloves for prevention of transmission of the COVID-19 pathogen, disposable gloves should be used. Gloves can provide a barrier between hands and produce, preventing transmission of pathogens to contact surfaces. They can also be a good reminder not to touch your face. Remember, however, that gloves can be a source of contamination if not used properly. Follow [CDC glove removal guidelines](#) and please remember to [follow hand washing guidelines](#) recommended by the CDC before putting on gloves and between glove change-outs. Farm management should support the proper use of disposable gloves by implementing the following requirements and procedures:

- a. If gloves are provided, make available sufficient quantities of disposable gloves to support single use by farm employees.
- b. Ensure that employees are washing hands before putting on gloves or in-between glove change outs.
- c. Identify locations and receptacles where gloves should be disposed.
- d. Consistently monitor the proper storage, use and disposal of disposable gloves.
- e. Ensure that proper training is provided for farm employees on the proper usage, storage and disposal of gloves on the farm.

### 4. Handwashing

Farm employees are required to wash and sanitize their hands at frequent intervals during the work day and upon entering the farm or any farm vehicles, after coughing, sneezing, eating, touching their face, using the restroom, between work activities, and any other time their hands may be a source of contamination. Farms should support proper hygiene practices during COVID-19 response by implementing the following requirements and procedures:

- a. Ensure adequate handwashing facilities are located at work locations at the farm that support partitioned and dispersed work crews.
- b. Promote frequent and thorough hand washing through signage, verbal reinforcement and training.

- c. Ensure soap and single use paper towels are provided at handwashing stations and restroom facilities on the farm.
- d. Ensure that trash receptacles are provided for the proper disposal of used paper towels at hand washing stations.
- e. Farm management should also provide alcohol-based hand sanitizers containing at least 60% alcohol.
- f. Hand washing stations [can be constructed relatively easily](#) and cheaply and deployed in support of personal hygiene practices to reduce the possible transmission of COVID-19.

## 5. Temperature taking and health assessment for Farm employees

Farms may employ temperature monitoring to identify potentially sick employees. In the United States, the [Equal Employment Opportunity Commission \(EEOC\) issued an update](#) to its guidance that now expressly acknowledges that employers may implement temperature screening measures in response to the current COVID-19 pandemic. ADA-covered employers are also allowed to inquire whether an employee has symptoms of COVID-19. Farms who are considering compulsory temperature taking are advised to weigh several issues prior to the implementation (e.g. who will administer checks, how to enforce compliance, contingencies, etc.) to ensure that all measures are implemented equally and there is no cause to suspect discrimination against any worker or group. Additionally, [OSHA rules](#) may apply.

- Farm labor camp operators must implement a worker screening process prior to the beginning of each work day according to recommendations from the Centers for Disease Control and Prevention (CDC) and requirements outlined on <https://www.mass.gov/info-details/covid-19-essential-services-faqs>.
  - Ask each individual worker if they have experienced unusual coughing, shortness of breath, headaches, chills, shaking chills, sore throat, muscle aches or pains, new loss of taste, or smell or whether they have felt feverish.

Take a temperature reading from each worker, or require employees to self-administer a temperature check, with a temporal artery (forehead) thermometer that is disinfected in between each use with an isopropyl alcohol wipe.

## 6. Farm employees who have symptoms associated with COVID-19 or test positive for COVID-19

Once a farm employee is diagnosed with COVID-19, the priority is to prevent further spread to other individuals. Transmission occurs primarily via respiratory droplets in the air, but it is possible that transmission may also occur via contact with an infected surface. Farm management and farm supervisors should support the proper identification and isolation of farm employees who may have symptoms or who have tested positive for COVID-19 by implementing the following practices, requirements and procedures:

- a. Symptomatic farm workers should be sent home or to their on-farm housing unit immediately, or if at home, not be allowed to come to the farm or report to work. Anyone who develops a fever (temperature over 100 degrees) or any of the listed symptoms, must consult with a medical provider. If they are diagnosed with COVID-19 or the provider considers them

likely to have COVID-19, regardless of whether a test is performed, the individual must isolate in compliance with CDC and DPH guidance and may not return to work until released from isolation according to that guidance. All confirmed cases of COVID-19 must be reported to the local board of health or the Department of Public Health Epidemiology Line at 617-983-6800.

- b. Farm staff who present severe symptoms (shortness of breath, chest pains, confusion, bluish lips or face) should seek immediate medical care and call 911.
- c. Farm employees experiencing mild symptoms should stay home and get in touch with their doctor or other medical provider.
- d. Areas that were utilized by sick employees should be immediately closed off for 24 hours if practical.
- e. Farm management should then undertake appropriate cleaning measures of the affected workspace or facility, as described below in the “Cleaning and Sanitizing” section and should allow adequate time before allowing the re-entry of farm employees into the affected space.

**7. If a worker has been exposed to COVID-19, do they need to be quarantined?**

Agricultural workers are considered essential workers and therefore may be permitted to continue to work following potential exposure to COVID-19, provided they remain asymptomatic and [additional precautions](#) are implemented to protect them and their fellow employees. A potential exposure means having close contact (within 6 feet, for more than 10 minutes) at work or home with an individual with confirmed or suspected COVID-19. The timeframe for having contact with an individual includes the period of time of 48 hours before the individual became symptomatic. Farm owners and farm supervisors should be aware of the following:

- a. Farm workers who have been exposed to COVID-19 and remain asymptomatic should follow FDA/CDC guidance issued for [food facilities potentially exposed to COVID-19](#).
- b. The U.S. [Equal Employment Opportunity Commission](#) explicitly allows ADA-covered employers to inquire whether employees have symptoms of COVID-19.
- c. Farms should determine which persons on the farm had contact with the ill employee during the time the employee had symptoms and 2 days prior to symptoms.
- d. If farm employees are exposed at work, employers should inform employees of their possible exposure to COVID-19 in the workplace while maintaining confidentiality.
- e. All individuals on the farm need to be monitored for illness.
- f. Other individuals in the facility who have separate job duties and did not come into contact with the infected individual or workspace should not be considered high risk for infection, do not require special treatment, and may continue working as normal, after contact surfaces and areas are isolated, cleaned and disinfected, as described below.

**8. When can a farm employee who has been sick return to work?**

- (1) If a farm employee tests positive or their doctor says they have confirmed or probable COVID-19, they must be directed to stay home for a minimum of 10 days from the 1st day of symptoms appearing AND be fever-free for 72 hours without fever reducing medications AND experience

significant improvements in symptoms. Release from isolation is under the jurisdiction of the local board of health where the individual resides.

- (2) If a farm employee tests negative or their doctor says they don't have COVID-19, they must be directed to stay home until at least 72 hours after fever is gone without fever reducing medications and symptoms get better;

#### 9. **Where can my workers learn more about COVID-19?**

Talk with your employees about coronavirus, how it spreads, and how to prevent getting infected. Print the [CDC factsheets and posters](#) (available in many languages), and post in your workplace and employee housing facilities. Provide usable and appropriate training, education, and informational material about worker health and safety, including proper hygiene practices and the use of any workplace controls (including PPE). Informed workers who feel safe at work are less likely to be unnecessarily absent. For Massachusetts specific updates, visit: <https://www.mass.gov/agr> and <https://www.mass.gov/resource/information-on-the-outbreak-of-coronavirus-disease-2019-covid-19>.

## **CLEANING AND SANITIZING**

### 1. **What is the difference between cleaning, sanitizing, and disinfecting?**

- **Cleaning** removes germs, dirt, and impurities from surfaces and objects using soap or detergent and water to physically remove them. Surfaces should be cleaned before being sanitized or disinfected; you cannot sanitize or disinfect a dirty surface.
- **Sanitizing** kills germs, lowering the number of germs on surfaces or objects to a safe level, as judged by public health standards or requirements. Sanitizers or sanitizing rates are generally not labeled for use against viruses.
- **Disinfecting** kills germs on surfaces or objects to a greater degree than sanitizing, often using a different disinfecting agent or a higher concentration of a sanitizing agent along with a longer contact time on the surface. Disinfectants may be labeled for use against viruses.

### 2. **Routine sanitizing and disinfecting**

**Sanitizing:** For routine cleaning and sanitizing on your farm as part of good agricultural practices for prevention of the spread of pathogens that cause foodborne illnesses, such as *E. coli* and *Salmonella*, you can continue using the cleaning products and sanitizing agents that are part of your existing protocols, such as bleach (sodium hypochlorite) or PAA (peroxyacetic acid) products. These products may have different rates and contact times on their labels for sanitizing and for disinfecting. Sanitizing rates are appropriate for food contact surfaces and for routine sanitation of surfaces that are of low risk for contamination with a viral pathogen.

**Disinfecting:** The EPA has provided [a list of disinfectants \(referred to as the 'N-list'\)](#) for use against [SARS-CoV-2](#), the virus causing COVID-19. Because SARS-CoV-2 is a new pathogen, most products have

not been evaluated for efficacy against this particular virus and it will likely not be on the label for these products. The listed products have demonstrated efficacy against harder to kill viruses or other human coronaviruses. The list is being updated with additional products as more information becomes available. Products on this list (which includes bleach and PAA-based products; Use your product's EPA # to determine if it is on the N list) are appropriate for use on farms for routine disinfection of hard, non-porous, non-food contact surfaces, such as door handles, railings, trash cans, cash registers, restrooms, and other high-touch surfaces.

Frequently clean and disinfect any areas where employees congregate or that they routinely touch; items such as doorknobs, timeclocks, shared tools and equipment, the employee breakroom and bathroom. Discourage workers from using other workers' phones, desks, work tools and equipment, or sharing food or utensils. Cell phones may be reservoirs for pathogens. Cell phones should be kept out of food handling spaces as much as possible. Explore requiring employees to leave phones in their lockers, check them only during breaks, and sanitize them with a product that has [70% isopropyl alcohol](#) frequently. Set up daily and weekly cleaning schedules. Wear disposable gloves to clean and wash your hands thoroughly after you're done.

### **3. What if someone on my farm has COVID-19?**

In the event that someone on your farm is confirmed or likely to be ill with COVID-19, any affected workspaces should be isolated and, if possible, ventilated and left unoccupied for 24 hours. All areas used by the sick person should be disinfected with an appropriate disinfectant (see N list, above, and [CDC recommendations for How to Clean and Disinfect Your Facility](#)). If any **food contact surfaces** require disinfection, follow the instructions of the disinfectant product you are using, then after the appropriate contact time, rinse with potable water and sanitize as normal. This additional rinse step prevents the disinfectant (often a higher concentration of active ingredient than a sanitizer) from itself becoming a source of contamination of food and the additional sanitizer step reduces any microbial risks introduced by the rinse step.

When using any chemical sanitizer or disinfectant, always follow the label as to the appropriate surface, rate, contact time, application method, and other instructions. Use adequate ventilation and appropriate personal protective equipment (PPE) and do not exceed labeled rates or use in a manner not described on the label. Do not mix chemicals; for instance, do not mix bleach with ammonia or any other cleaner.

## **SEASONAL FARM LABOR CAMPS**

### **1. Housing Provisions:**

The CDC recommends a minimum of 6 feet between beds or bunks. If the current housing unit does not allow for segregation of workers under social distancing guidelines, arrangements may be needed to secure additional housing such as rental units at motels and hotels. Position beds so that workers sleep head-to-toe to limit exposure to respiratory droplets. Provide additional cloth facemasks to employees to wear while in their housing. Ensure that adequate ventilation is provided in habitable

rooms, including screened windows that open. If a doorway is used for ventilation, provide a properly fitted screen door. Ensure bathrooms and other sinks are consistently stocked with soap and drying materials for proper handwashing.

## **2. Routine Cleaning and Sanitizing:**

Housing should be kept in a clean and sanitary condition at all times, with a specific focus on sanitizing high-touch surfaces, including tables, chairs, doorknobs, light switches, handles, toilets, faucets, sinks and field equipment. Provide guidance to help employees clean and disinfect employer-provided housing. Provide cleaning supplies such as cleaning solutions, buckets, mops, and sponges. Designate a specific individual to manage the process to be sure that cleaning measures are adequate. Set up a regular weekly and daily schedule for cleaning. See the [CDC's guidance for cleaning homes](#). See the "Cleaning and Sanitizing" section above for additional information regarding cleaning products and procedures.

## **3. Quarantine Housing Accommodations:**

Have a plan in place for housing in the case that a worker(s) displays COVID-19 symptoms. Ill persons must be isolated from other occupants. Confine workers with mild respiratory symptoms consistent with COVID-19 infection to individual rooms, if possible, and have them avoid common areas. Temporary housing may be needed to limit exposure to other workers. Designated areas for quarantined employees should be provided with separate sleeping, cooking, and bathing facilities. Ensure appropriate Personal Protective Equipment (PPE) such as masks for workers who develop COVID-19 symptoms or test positive are properly worn to prevent the spread of the virus to others. Ensure quarantined workers have sufficient food, supplies, and transportation to medical care. See the section entitled "Worker Health" above for more information.

## **4. COVID-19 Cleaning and Sanitizing:**

Thorough deep cleaning of the housing unit is required after a worker is confirmed to have COVID-19 to ensure proper disinfection of the housing and work areas. If possible, open the windows and doors of the housing unit or use ventilation fans to increase air circulation in the area. Wait 24 hours or as long as practical before re-entering the space to begin cleaning and disinfection. Hard (non-porous) surfaces should be cleaned first using a detergent or soap and water prior to disinfection. For surfaces such as carpets, rugs, and drapes, remove visible contamination and clean with cleaners appropriate for use on these surfaces. If the items can be laundered, wash items in accordance with the manufacturer's instructions using the warmest appropriate water setting for the items and dry completely. EPA-registered disinfectants suitable for porous surfaces can also be used. See the "Cleaning and Sanitizing" section above for additional information regarding cleaning products and procedures.

## **5. Transportation:**

Transportation is often required for workers to travel from their housing units to their worksite, purchase essential supplies such as food, launder personal items, and obtain access to toilet facilities while working in the field. The following measures can help to maintain social distancing and safety

during transportation: Limit the number of workers transported at one time, maintain 6 feet of physical distance in vehicles whenever possible, and ensure workers are not sitting directly next to each other. Additional drivers may be needed to drive and transport workers to allow for social distancing. Provide and transport workers in vehicles with functional ventilation systems or operable windows. Designate a trained individual who is responsible for disinfecting transportation vehicles on a routine basis, but no less than daily cleaning. Schedule trips in advance to the grocery stores to limit the number of workers in a vehicle or in the community at any one time. Share information about grocery delivery options and encourage employees to consider using these services whenever possible to limit risk of exposure. Wear cloth face coverings in vehicles and in public settings, in addition to maintaining social distancing measures.

## **FARM OPERATIONS AND POLICIES**

### **1. Deliveries:**

Create a Standard Operating Procedure (SOP) and train employees on the handling of deliveries to the farm. While the [CDC has stated](#) that transmissions to persons from surfaces has not been documented, this remains a possible route of exposure. According to the NIH, the virus that causes COVID-19 can be stable for [several hours to days on surfaces](#)—up to 24 hours on cardboard and up to two to three days on plastic and stainless steel. The length of time that the coronavirus lasts on surfaces depends on a number of factors, including the material of the surface as well as environmental conditions. As this is the case, it is important to emphasize handwashing after handling any deliveries.

### **2. Farm Visit Log:**

Keep track of who is visiting your farm, in addition to tracking worker shifts and hours. A visitor log will help you track exposure, in case a worker or visitor becomes ill. Exposed employees will need to be informed of their exposure and take additional precautions, including routine monitoring, social distancing and wearing a mask. (See question #3 under “Worker Health” on page 2 for more information.)

### **3. Labor Shortages:**

Prepare a plan for possible labor shortages. Employees may need to stay at home to care for children who are home from school or care for sick family members. Create an alternative management plan in case you or another key manager becomes ill. Identify neighboring farms or organizations that might be able to share resources in an emergency.

### **4. Will I need to close my facility if a worker gets sick?**

If a worker gets sick, you will need to perform a thorough cleaning and disinfecting of all areas and surfaces that the worker was in contact with, which will likely mean temporarily halting operations.

### **5. Will I need to recall my products if a worker gets sick?**

There is currently no evidence to support that the SARS-CoV-2 virus can be transmitted to humans through food or food packaging materials. The FDA does not anticipate that food will need to be held,

recalled or withdrawn from the market due to possible exposure to SARS-CoV-2 through a person that has tested positive for the COVID-19 virus that works at a food facility.

**6. Families First Coronavirus Response Act:**

This Act requires certain employers to provide their employees with federally reimbursable paid sick leave and expanded family and medical leave for specified reasons related to COVID-19. These provisions will apply from April 1<sup>st</sup>, 2020 to December 31<sup>st</sup>, 2020. Read more from the U.S. Department of Labor on [MDAR's Farm Labor Resources page](#).

**Future Updates**

This information is based on what we know now and will be updated as we learn more. Please visit: <https://www.mass.gov/agr> and <https://www.mass.gov/resource/information-on-the-outbreak-of-coronavirus-disease-2019-covid-19> for updates.