

OSHA's Field Sanitation Standard



Photo by Earl Dotter



In 1987, the U.S. Occupational Safety and Health Administration (OSHA) issued the Field Sanitation Standard with the goal of providing agricultural workers with access to clean water and toilet facilities in the field. The Field Sanitation Standard requires agricultural employers to provide toilets, potable drinking water, and hand washing facilities to all hand-laborers in the field.¹ It mandates that employers allow employees reasonable use of these facilities and that they inform employees of the importance of good hygiene practices.

Illnesses and Injuries related to Field Sanitation in Agriculture

Agricultural workers are at high risk for heat stroke and other heat-related illnesses. Tasks often include tough physical labor and workers sometimes wear heavy protective clothing to guard against pesticides and other hazards. According to the U.S. Centers for Disease Control and Prevention, crop workers die from heat-related illness at a rate 20 times that of all U.S. civilian workers.²

Inadequate sanitation facilities put workers at further risk for infectious and gastrointestinal diseases as well as pesticide exposure. Without proper handwashing facilities, including soap and single-use towels, workers are more likely to spread infectious disease and develop communicable diseases such as intestinal parasites, which have been found to disproportionately infect migrant agricultural workers.³ They also put themselves at increased risk of pesticide exposure through residue contamination when eating, drinking, or using the toilet.⁴ In addition, lack of access to clean toilets can result in gastrointestinal illnesses and urinary tract infections. This is an issue of concern particularly for female workers when they use unsanitary hygiene materials or do not have easy access to toilets.

¹ 29 CFR § 1910.110

² Centers for Disease Control and Prevention, Heat Related Deaths among Crop Workers – United States, 1992-2006, *Morbidity and Mortality Weekly* 57(24): 649-653 (2008).

³ Ciesielski, et al, Intestinal Parasites among North Carolina Farmworkers, *American Journal of Public Health* 82(9): 1258-1262 (1992).

⁴ See, for example: Curwin BD, Hein MJ, Sanderson WT, Nishioka M, Buhler W. 2003. Acephate exposure and decontamination on tobacco harvesters' hands. *Journal of Exposure Analysis and Environmental Epidemiology* 13(3): 203-210

Clinicians should consider these and other occupational conditions that foster water, sanitation and hygiene-related injuries and illnesses. They should remind patients about the importance of safe hygiene practices and how such practices can help to minimize pesticide exposure and prevent infectious diseases. If clinicians suspect that a violation of the Field Sanitation Standard is occurring, they should call a local legal services office, or the appropriate state or federal agency responsible for enforcing the law to report the violation.

Basic Protections of the Field Sanitation Standard

The Field Sanitation Standard applies only to workplaces where employees are engaged in “hand-labor,” which includes work done by hand or with hand-tools during cultivation, weeding, planting, and harvesting of vegetables, nuts, fruits, seedlings, or other crops, and the packing of produce in the field into containers. It does not apply to logging operations, livestock, or permanent structures (for example, canneries). The Field Sanitation Standard requires agricultural employers to provide the following, without cost to the employee:

- Potable drinking water
- Toilets and handwashing facilities
- Notification of location of toilets, handwashing facilities, and drinking water, and allowance of reasonable use of these facilities
- Maintenance of facilities in accordance with public health sanitation practices
- Information on the importance of good hygiene

Potable Drinking Water

Employers must provide potable drinking water that is suitably cool and in sufficient amounts, taking into account the temperature, humidity, and nature of the work. It must be accessible to workers and dispensed in single-use cups or by fountain. Dippers, common cups, and reusable cups are not permitted.

Toilets and Handwashing Facilities

One toilet and one hand washing facility are required for every twenty (20) workers. Toilets must be adequately ventilated and constructed to ensure privacy, with doors that can be closed and locked from inside. Hand washing facilities should include potable water, soap and single-use towels to dry hands. Toilets and handwashing facilities must be located in close proximity to each other and within ¼ mile of each worker. If this is not possible, they must be located at the point of closest vehicle access.

Notification and Reasonable Use

Employers must notify each employee of the location of water, handwashing, and toilet facilities. Employees must be allowed reasonable opportunities during the workday to use them.

Maintenance

Employers are responsible for ensuring that potable drinking water, toilet, and hand washing facilities are maintained in accordance with public health sanitation practices. Drinking water containers must be constructed of materials that maintain water quality and must be kept covered and regularly cleaned. Water must be refilled daily or as necessary. Handwashing facilities must be maintained in a sanitary condition and refilled with water as necessary. Toilet facilities must also be kept clean and waste must be disposed of in a sanitary fashion.

Information on Good Hygiene

Employers are required to inform employees of the importance of good hygiene practices. They should indicate that these practices are important to minimize heat-related illness, communicable diseases, urine retention, and pesticide exposure. They must encourage employees to use the water and facilities provided for personal sanitation, to drink water frequently, urinate as frequently as necessary, wash hands both before and after using the toilet, and wash before eating or smoking.

Enforcement

The Field Sanitation Standard applies to all agricultural establishments employing 11 or more workers in “hand-labor” on any given day during the previous 12 months. It is enforced in most states by the Department of Labor’s Wage and Hour Division (WHD). However, a number of states, including Arizona, California, Hawaii, Maryland, Michigan, New Mexico, Nevada, North Carolina, Oregon, Tennessee, Virginia, Vermont, and Washington enforce the regulations through state agencies under cooperative agreements with OSHA.

Agencies and inspectors responsible for Field Sanitation Standard enforcement will conduct routine inspections to monitor employer compliance with the regulations, as well as some “for cause” inspections that are usually initiated in response to a complaint or referral.

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