

# **SAMPLE: Interim Standard Operating Procedure (SOP) for Physical Distancing on for Farm Workers during communicable disease outbreak of COVID-19**

**Introduction:** Most farm work is performed outdoors where ample ventilation naturally reduces concentrations of potential airborne pathogens, such as the COVID-19 virus, relative to indoor environments. Farm worker crews typically work spread out over a large area; USDOL's O-NET rates farm work among the occupations with the lowest likelihood for work in close physical proximity to others<sup>1</sup>. Nonetheless,

This procedure has been informed by Centers for Disease Control (CDC)'s "Social Distancing, Quarantine, and Isolation"<sup>2</sup> guidance, as well as OSHA's "Guidance on Preparing Workplaces for COVID-19"<sup>3</sup> and Cal/OSHA's "COVID-19 Infection Prevention for Agricultural Employers and Employees"<sup>4</sup>. It is based on what is currently known about the coronavirus disease 2019 (COVID-19)<sup>5</sup>.

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**Purpose:** The purpose of this procedure is to implement social/physical distancing as one of various prevention techniques to reduce worker exposure to COVID-19 infection while at work on [Company] farms.

**Objective:** Ensure that employees are working with ample space between them to reduce the potential spread of COVID-19 while at work.

**Scope:** This SOP is intended as an interim worker safety procedure during the COVID-19 outbreak in farm settings where unknown or inactive carriers of COVID-19 may be present. This procedure does not substitute for, or replace, other important practices that protect workers from possible exposure to COVID-19, such as excluding symptomatic employees from the worksite, increasing flexibility for employees to take sick leave when needed, and maintaining frequent handwashing, sanitation and face covering practices in the workplace.

During the COVID-19 outbreak, everyone must limit close contact with individuals when outside their home and in indoor AND outdoor spaces. Since people can spread the virus before they know they are sick, it is important to stay away from others as much as possible, even if no one has symptoms. Social distancing is especially important for people who are at higher risk for severe illness<sup>6</sup>.

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<sup>1</sup> <https://www.onetonline.org/find/descriptor/result/4.C.2.a.3?a=1> Farm workers are ranked 8<sup>th</sup> lowest out of 967 occupations rated for work in close physical proximity to others.

<sup>2</sup> <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/social-distancing.html>

<sup>3</sup> <https://www.osha.gov/Publications/OSHA3990.pdf>

<sup>4</sup> <https://www.dir.ca.gov/dosh/Coronavirus/COVID-19-Infection-Prevention-in-Agriculture.pdf>

<sup>5</sup> <https://www.cdc.gov/coronavirus/2019-ncov/about/index.html>

<sup>6</sup> <https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-at-higher-risk.html>

**Definitions:**

**Social distancing**, also called “physical distancing”, as defined by CDC<sup>7</sup>, means keeping space between people. To practice social or physical distancing:

- People should stay at least 6 feet (2 meters) from others.
- People should not gather in groups of more than 10 people.
- People should not remain in crowded spaces.

**Frequency:** Until all close person-to-person contact potential is evaluated and reduced, as feasible, employers should continue to encourage process and behavior changes on the farm. Consider where and when workers are most likely to congregate or work in close proximity to one another, especially in enclosed areas, or work with shared tools or surfaces. Employers should focus on redesign of these work processes in order of priority, starting with those where group sizes are largest, where proximity is closest, where duration of interactions is longest.

**Responsibility:** Assign specific personnel to redesign specific work processes, as best conform to ranch operations, job duties, and training required. Likewise, once new processes have been defined, assign specific personnel to communicate new procedures and training all team members at all levels, as well as follow up to make sure physical distancing practices are being upheld in the workplace.

**Procedure:** Employers should develop policies and practices that ensure more distance between workers as is reasonably possible for the work context.

Some of the solutions recommended by OSHA include<sup>8</sup>:

- Flexible worksites (e.g., telecommuting)
- Flexible work hours (e.g., staggered shifts),
- Increase the physical distance among employees and between employees (e.g. pick every other row)
- Discourage workers from using other workers’ phones, desks, offices, or tools and equipment, when possible.

CalOSHA recommends the following “Procedures to Increase Physical Distancing”<sup>9</sup>

- Physical distancing should be practiced, whether outdoors, in vehicles, or in structures.
- Establish work practices and workstations, and adjust line speed and other processes to enable employees to maintain safe physical distancing while working.
- Stagger break and lunch times.
- Limit crew size by staggering work shifts or increasing the number of work shifts.
- Provide additional seating and shade structures to allow employees to take breaks while staying at least six feet apart.
- Encourage employees to avoid large gatherings and practice physical distancing during non-work hours. Employers who house workers are encouraged to be proactive in making physical distancing possible and to take affirmative steps to quarantine any housed

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<sup>7</sup> <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/social-distancing.html>

<sup>8</sup> <https://www.osha.gov/Publications/OSHA3990.pdf>

<sup>9</sup> <https://www.dir.ca.gov/dosh/Coronavirus/COVID-19-Infection-Prevention-in-Agriculture.pdf>

worker exhibiting symptoms.

- Establish a location for receiving regular deliveries away from on-farm high-traffic areas and housing. Place drop-boxes or drop-off locations near the road so vehicles do not need to enter the farm.

Specific application of these recommendations for strawberry ranches may include:

### **Worker Transportation**

- Where buses/vans bring workers to/from the field, consider adding more vehicles/drivers, or more trips (with staggered start/end time) so vehicles operate with lower passenger density (ideally, with 6 feet between each person).
- Keep windows open while passengers are on board to facilitate movement of air to carry away potential airborne viruses.
- All passengers and drivers wear face coverings to reduce the spread of virus from asymptomatic persons
- All vehicle surfaces are cleaned/disinfected by the vehicle operator between uses.

### **Staggered start/stop and break times**

- To reduce congestion at points of convergence, consider breaking up larger crews into smaller ones with staggered intervals between start times.
- Stagger rest and meal periods, to reduce crowding around common resources like restrooms, handwashing facilities, and break areas.

### **Increase distance between workers and reduce time in close proximity to others**

- Reduce crew sizes and spread crews out as much as possible across the block or field.
- Where possible, assign workers to every other row, keeping one row empty in between workers. When workers must work adjacent rows, try to reduce time in close proximity to one another (i.e. let one move ahead while one stays behind).
- In areas where workers are prone to converge (standing in lines, around restrooms, handwashing, water, inspection table/trailers), place visible markers at 6-foot intervals as guides to maintain space between people.
- Similarly, for high-convergence areas, consider establishing one-way traffic flow to reduce close encounters or collisions in narrow spaces. Use highly visible signage and communicate instructions so all understand.
- Where some employees must work in fixed positions with high-contact with others (i.e. checkers, inspectors, stackers) consider increasing physical barriers (create greater to separate functions, add plexiglass 'sneeze guard', or provide higher-performing N-95 masks for these workers in high-contact roles).
- Place seating at 6-ft or greater distances prior to rest and meal breaks and prohibit employees from moving them.
- Acquire additional shade/seating facilities to permit distanced spacing of employees during these breaks.