

*Worker Protection*  
*Farmworker/Public Health Perspective*

PPDC

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# Hierarchy of Controls

## Occupational Health

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- Eliminate the hazard at its source
- Substitute for something less hazardous
- Isolate the hazard by total containment of the process
- Engineering controls
- Safe work procedures and administrative controls
- Personal Protective Equipment (PPE)

# Farmworker Focus

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- **Expanded Training**
- **Hazard Communication**
- **Training Administration**
- **Remaining Issues**

# Post Application Worker EXPAND SAFETY TRAINING

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- **Prevent exposure on the job (expand)**
- **Workers' rights**
- **Protect families and children**
- **Reporting suspected pesticide illnesses**
- **Hazard Communication**

# Making Hazard Communication Part of the WPS

- OSHA's Hazard Communication Standard covers almost all workers exposed to hazardous chemicals, except farmworkers exposed to pesticides
- OSHA requires: (i) training before workers are exposed to the chemical; (ii) access to a Material Safety Data Sheet (MSDS) provided by the chemical manufacturer; and (iii) labeling
- In 1992 EPA proposed a hazard communication requirement, but it never became final
- The GAO found that implementation of the HCS led to a reduction in the use of hazardous chemicals and an increase in safety awareness

# Providing Farmworkers with Meaningful Hazard Communication

- **Most post-application workers and many handlers are immigrants with limited English proficiency.**
  - **For most agricultural workers and handlers, MSDSs would not provide information in a readily understandable format**
  - **Convey hazard information using pictures with few words; in multiple languages**
- **For fieldworkers, information should cover short- and long- term health effects; REI, when pesticide is used**
- **EPA can develop the format for a pictorial hazard information sheet**
- **Pictorial hazard information sheets should be produced by registrants and be provided with products labeled for agricultural use with reference to WPS**
- **Employers should provide these simple sheets to workers**

# Post Application Worker

## IMPROVE TRAINING ADMINISTRATION

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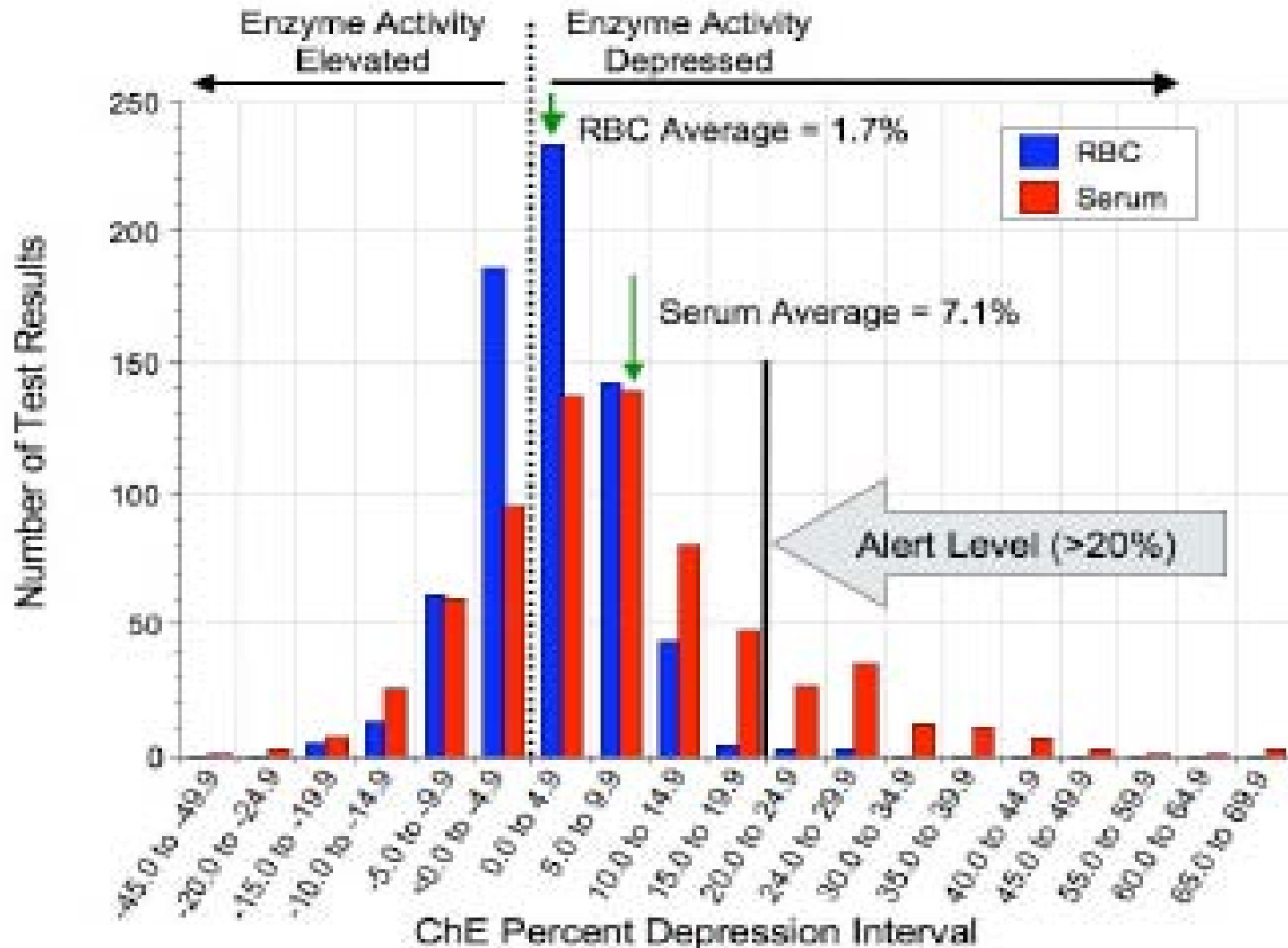
- **Annual Training. No Grace Period.**
- **Training of Trainers**
- **Training Verification**
  - **Cards**
  - **SLA, grower, trainer retain verification of training**

# What's Missing?

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- National ChE monitoring program
  - Washington, California
- Employers cover cost
- SLA investigates a 20% or more ChE depression

# Change in ChE in 600 WA Handlers, 2006



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- Isolate the hazard by total containment of the process
- Engineering controls
- Safe work procedures and administrative controls (training goes here)
- Personal Protective Equipment (PPE)