



# A Guide to OSHA's Field Sanitation Standard

## For Migrant-Serving Clinicians

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

### **The Importance of Potable Drinking Water and Safe Hygiene Practices for Farmworkers**

Farmworkers are at high risk for heat stroke and other heat related illnesses. Most agricultural work is performed in direct sunlight, far from the nearest shade. 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. During the 15-year period between 1992 and 2006, 68 crop workers died of heat-related causes. The availability of potable drinking water is vital to prevent farmworkers from overheating on the job.<sup>2</sup>

Workplaces with inadequate field sanitation facilities foster communicable diseases. Infectious diseases such as influenza are more likely to spread if workers drink from a communal drinking cup, have no soap or water for hand washing or do not use single-use towels.<sup>3</sup> Additionally, hand washing with soap and water is important to prevent other communicable diseases such as intestinal parasites, which have been found to disproportionately infect migrant farmworkers.<sup>4</sup>

Farmworkers are also at risk for pesticide exposure. Proper hand washing may reduce the risk that pesticides would contaminate workers' bodies when eating, drinking, smoking, or using the toilet.<sup>5</sup>

Finally, the provision of toilets and hand washing facilities in the field is important to prevent gastrointestinal diseases and urinary tract infections, the latter occurring particularly among female farmworkers. UTIs can result from urine retention or the use of unsanitary hygiene materials when farmworkers do not have easy access to toilets.<sup>6</sup>

### **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 hand washing facilities
- Notification of location of toilets, hand washing 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**

Agricultural 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 Hand Washing 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 hand washing facilities must be located in close proximity to each other and within  $\frac{1}{4}$  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, hand washing, 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. Hand washing 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 federal 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.<sup>7</sup>

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.

## Important Considerations for Migrant Clinicians

Clinicians should consider the 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. MCN has developed a [reporting tool](#) for information on state-by-state requirements and state enforcement agencies for the Field Sanitation Standard.

## Notes

<sup>1</sup>The Field Sanitation Standard can be found at 29 CFR § 1910.110 et seq.

<sup>2</sup>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).

<sup>3</sup>On the risk of influenza pandemics for farmworkers, see Steege AL, Baron S, Davis S, Torres-Kilgore J, Sweeney MH. 2009. Pandemic influenza and farmworkers: the effects of employment, social, and economic factors. *American Journal of Public Health* 99(Suppl. 2): S308-15.

<sup>4</sup>Ciesielski, et al, Intestinal Parasites among North Carolina Farmworkers, *American Journal of Public Health* 82(9): 1258-1262 (1992).

<sup>5</sup>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.

<sup>6</sup>For the connection between UTI and urinary retention, see Adato K, Doebele KG, Galland L, Granowetter L. 1979. Behavioral Factors and Urinary Tract Infection. *Journal of the American Medical Association* 241(23): 2525-2526.

<sup>7</sup>Some states apply the Field Sanitation Standard to smaller farms as well. See attached chart for contact information for the enforcement agency in each state.

*The contents of this publication are solely the responsibility of Farmworker Justice and Migrant Clinicians Network and do not necessarily reflect the official views of the Bureau of Primary Health Care or the Health Resources and Services Administration.*

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