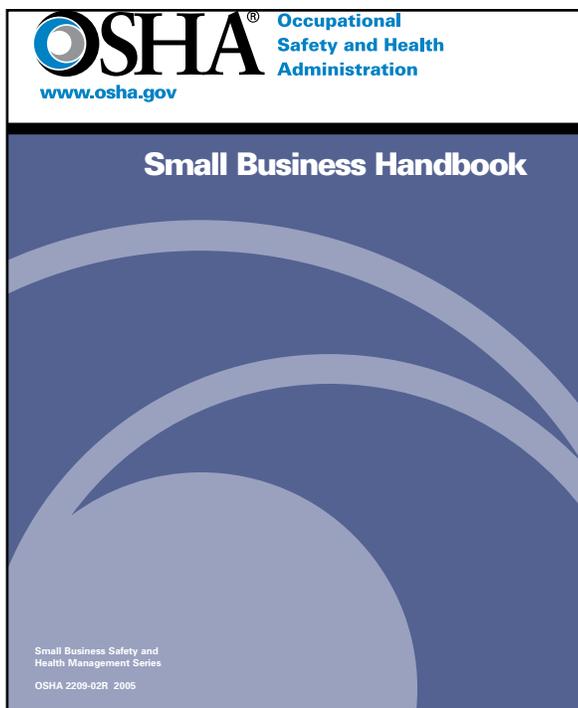# Small Plant NEWS

Inside

Know OSHA's Safety and Health Standards

By Denise Amann, DVM

In order to ensure safe and healthful working conditions, Congress passed the Occupational Safety and Health Act of 1970 (OSH Act) and created OSHA. OSHA sets and enforces safety and health standards and also provides training, outreach, education, and assistance for meeting those standards.

The OSH Act covers all employers and their employees directly through OSHA. Alternatively, under the OSH Act, States may assume responsibility for regulating occupational and health standards by creating their own programs. These programs must be approved by OSHA and meet or exceed Federal OSHA standards for workplace safety and health. Under the OSH Act, Federal Departments are also required to establish safety and health programs for employees.

All employers are responsible for understanding the standards applicable to their activities and ensuring that employees are provided with, and use, the required personal protective equipment. The OSHA regulations that affect federally inspected meat, poultry, and processed egg products

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establishments are found in Title 29 of the *Code of Federal Regulations* (CFR), Sections 1910 and 1960:

- 29 CFR 1910 - General Industry Standards
- 29 CFR 1960 - Federal Employee Program

The following is an excerpt from OSHA's "Small Business Handbook." The handbook is available in its entirety at *www.osha.gov/Publications/smallbusiness/small-business.pdf.*

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As an employer, it is your responsibility to know what items or substances you have in your workplace that could hurt your workers. Worksite analysis is a group of processes that helps you make sure that you know what you need to keep your workers safe. For help in getting started with these processes, you can call on your State on-site Consultation Program and have an experienced health and safety professional visit your workplace for free and confidentially. Locations for each State are listed on OSHA's Web site at *www.osha.gov.*

Here are some actions to consider:

- Request a consultation visit from your state on-site Consultation Program covering both safety and health to get a full survey of the hazards that exist in your workplace and those that could develop. You can also contract for such services from expert private consultants if you prefer.

- Establish a way to get professional advice when you make changes to procedures or equipment, to ensure that the changes are not introducing new hazards into your workplace. Find ways to keep current on newly recognized hazards in your industry.

- Periodically review with employees each job, analyzing it step-by-step to see if there are any hidden hazards in the equipment or procedures.

- Set up a self-inspection system to check your hazard controls and evaluate any new hazards. Provide for regular equipment maintenance to prevent breakdowns that can create hazards. Ensure that preventive and regular maintenance are tracked to completion.

- Plan for emergencies, including fire and natural disasters. Conduct frequent drills to ensure that all employees know what to do under stressful conditions. Make sure fire exit doors are never chained and locked from the inside or outside. If the door has to be secured from the outside, it must have a spring-loaded push handle attachment from the inside.*

- Ask your state consultant to help develop a medical program that fits your worksite. Involve nearby doctors and emergency facilities by inviting them to visit your workplace and help you plan the best way to avoid injuries and illness during emergency situations.

- Ensure the ready availability of medical personnel for advice and consultation on matters of employee health. **This does not mean that you must provide health care**, but you must be prepared to deal with medical emergencies or health problems connected to your workplace.

To fulfill the above requirements, consider the following:

- Develop an emergency medical procedure to handle injuries, transport ill or injured workers, and notify medical facilities. Posting emergency numbers is a good idea.

- Survey the medical facilities near your place of business and make arrangements for them to handle routine and emergency cases. Cooperative agreements may be possible with nearby larger workplaces that have on-site medical personnel and/or facilities.

- Ensure that your procedure for reporting injuries and illnesses is understood by all employees.

- Perform routine walkthroughs of the worksite to identify hazards and to track identified hazards until they are corrected.

- If your business is remote from medical facilities, you are **required** to ensure that adequately trained personnel are available to render first aid. First-aid supplies must be readily available for emergency use. Arrangements for this training can be made through your local Red Cross chapter, your insurance carrier, your local safety council, and others.

- Check battery charging stations, maintenance operations, laboratories, heating and ventilating operations, and any corrosive materials areas to make sure the **required** eyewash facilities and showers are operational.

- Consider retaining a local doctor or an occupational health nurse on a part-time or as needed basis for advice on medical and first aid planning.

- An emergency eye-wash fountain is very helpful for foreign contamination accidents involving eyes, even with eye goggles.*

An effective accident prevention program requires proper job performance from everyone in the workplace. As an owner or manager, you must ensure that all employees know about the materials and equipment they work with, known hazards, and how to control the hazards.

A Brief Reminder: Here Are the Labeling Basics

By Tracy Hewitt, Ph.D.

A s you know, one of the USDA Food Safety and Inspection Service's (FSIS) responsibilities is to ensure that the labels on meat, poultry, and processed egg products are truthful and not misleading. This is a vital public health protection measure for consumers. Since labeling questions are among the most common types of questions that small and very small plant owners and operators ask the Small Plant Help Desk, here's a brief reminder of the label requirements.

You need to develop a label following specific guidelines, and it must be approved by FSIS before your label can be used on products that are intended for marketing and sale in commerce. There are eight mandatory requirements for your product labels:

1. Product name;
2. Inspection legend and establishment number;
3. Handling statement;
4. Net weight;
5. Address line;
6. Safe handling instructions;
7. Ingredients statement; and
8. Nutrition facts.

All information required to appear on the label of a package must appear either on the principal display panel or the information panel, unless otherwise specified by regulation. The product name, inspection legend/establishment number, handling statement (if applicable), and net weight **must** appear on the principal display panel. The address line, ingredients statement, and nutrition facts may be displayed on the principal display panel or on the information panel. The information displayed on both the principal display panel and the information panel must be "prominent and conspicuous." Safe handling instructions may appear anywhere on the label.

The Federal agencies that have jurisdiction over food labeling receive their regulatory authority from several principal statutes:

- Federal Meat Inspection Act (FSIS);
- Poultry Products Inspection Act (FSIS);
- Egg Products Inspection Act (FSIS);
- Agricultural Marketing Act (USDA's Agricultural Marketing Service);
- Federal Food, Drug, and Cosmetic Act (Food and Drug Administration);
- Food Allergen Labeling and Consumer Protection Act (Food and Drug Administration); and
- Fair Packaging and Labeling Act (Federal Trade Commission).

The Federal Trade Commission, under the Federal Trade Commission Act, prohibits false and deceptive advertising.

For more information on labeling requirements for meat and poultry products, refer to Title 9 of the *Code of Federal Regulation*s, sections 317.5 and 381.133 (9 CFR 317.5 and 381.133). You can also check out the webpages at *www.fsis.usda.gov/Regulations_&_Policies/ Labeling_Procedures* and *www.fsis.usda.gov/About_FSIS/ labeling_&_consumer_protection.*

FSIS also has a publication, *A Guide to Federal Food Labeling Requirements for Meat and Poultry Products*, that may be accessed at *www.fsis.usda.gov/pdf/Labeling_ Requirements_Guide.pdf.*

If you have any questions or require further assistance, contact the Small Plant Help Desk at (877) 374-7435. You may also send an email to *InfoSource@fsis.usda.gov*.

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Each employee needs to know that:

- No employee is expected to undertake a job until he or she has received job instructions on how to do it properly and is authorized to perform that job. Also,

- No employee should undertake a job that appears unsafe.

    You may be able to combine safety and health training with other training, depending upon the type(s) of hazards in your workplace.

Here are some actions to consider:

- Ask your State consultant to recommend training for your worksite. The consultant may be able to conduct training while he or she is there.

- Make sure you have trained your employees on every potential hazard that they could be exposed to and how to protect themselves. Then verify that they really understand what you taught them.

- Pay particular attention to your new employees and to employees who are moving to new jobs. Because they are learning new operations, they are more likely to get hurt.

- Train your supervisors to understand all the hazards faced by the employees and how to reinforce training with quick reminders and refreshers, or with disciplinary action, if necessary.

- Make sure that your top management staff understands their safety and health responsibilities and how to hold subordinate supervisory employees accountable for theirs.

*The statements in red are not contained in the OHSA handbook.

If you have any questions about OSHA workplace health and safety requirements for your plant, you may wish to submit your question at *www.osha.gov/ecor_form.html* (email form) or call 1-800-321-OSHA (6742). If you prefer, you may also write to the U.S. Department of Labor, Occupational Safety and Health Administration, 200 Constitution Avenue, Washington, D.C. 20210.

Commonly Asked Questions & Answers

Q. *Is there a potential problem with cross-contamination if an establishment makes several kinds of fully cooked chicken patty nuggets with different ingredients (e.g., some contain soy flour and whey in the breading and others do not) and the products are deep-fat fried in the same oil?*

A. Yes, there is a potential public health concern. According to information available on the Institute of Shortening and Edible Oils Web site, foods cooked in edible oils may result in traces of allergenic proteins being left behind in the oil. Establishments that use the same oil as a cooking medium for a variety of products should consider in their hazard analysis the hazard to food-allergic consumers that the shared use poses and then control the hazard in their HACCP plan or prevent the hazard through Sanitation Standard Operating Procedures or other prerequisite programs.

Q. *Can Inspection Program Personnel (IPP) approve labels for single-ingredient cuts of beef that do not bear any special statements or claims?*

A. No. In 1983, FSIS IPP were granted authority to approve limited types of labeling (e.g., labels for single-ingredient cuts of meat bearing no special claims, guarantees, or foreign language). However, the 1996 final rule that amended FSIS' prior label approval system eliminated the authority for inspectors to grant label approval. Labels for single-ingredient cuts of meat that do not bear any special claims, guarantees, or foreign language are considered generically approved under 9 CFR 317.5(b)(2) or 381.133(b)(2). Such labels need to bear all required labeling features prescribed in 9 CFR 317.2, but if they do, because they are generically approved, they do not need to be submitted to FSIS for sketch approval.