

Guidelines for Vineyard Operations In Response to the COVID-19 Coronavirus

**Oregon Vineyard Task Force
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Introduction

The Oregon Vineyard Task Force has developed this document to highlight key guidelines for vineyard operations in response to COVID-19 and to provide a reference to the various guidance documents that are available.

This document was prepared based on information made available by the Oregon Governor's office, OHA, ODA, OR-OSHA and the CDC as of the date first set forth above. This document is intended to be a resource for developing your own operational rules and procedures. It is not intended to provide or replace legal, financial or operational advice. Additional local laws, regulations and guidelines may apply that are not addressed here. It is strongly recommended that you consult with your advisors and regularly check for updates from the sources relied on herein and other appropriate sources to remain current regarding this ongoing matter. Periodic review of these guidelines will be performed to adapt them as the health risk from COVID-19 increases or decreases, but may not always be up to date with the most current information made available by state, local and other authorities.

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OSHA Temporary Rule for Farm Workers

Oregon OSHA's rule went into effect for farm workers on May 11, 2020 to deal with the COVID-19 Pandemic and is set to expire on October 21, 2020. The changes are enforceable by law. The entire rule can be found [here](#) and the following are the major changes applicable to vineyard operations.

- **Requires** employers to appoint one or more “social distancing officers” and to plan and implement work practices in order to ensure appropriate social distancing (at least 6’ separation) during work activities, breaks, and meal periods.

Field Sanitation

- **Effective June 1, 2020**, increases toilet availability by decreasing the ratio of both toilet and handwashing facilities in the field from the current 1 per 20 workers to 1 per 10 workers. Requires employers who can demonstrate that market availability prevents immediate compliance to provide as many toilet and handwashing facilities as possible until the ratio is achieved.
- **In addition to the existing requirement** that toilet and handwashing facilities be within ¼ mile of the workers, requires toilets to be located at the entrance or exit to the field or in a completely harvested area, whichever is closer.
- **Requires** toilets and handwashing facilities to be sanitized at least three times daily.
- **Revises** the field sanitation notice and training requirements to include prevention of COVID-19.

Labor Housing

- **In relation to registered Agricultural Labor Housing operations**, provides additional guidance regarding registration of temporary housing and the use of existing hotel or motel facilities.
- **Requires employers to appoint one or more “social distancing officers”** and to plan and implement housing operations in order to ensure appropriate social distancing (at least 6’ separation) between unrelated individuals.
- **Effective June 1, 2020**, requires additional toilets by reducing the ratio from 1 toilet for every 15 workers to 1 toilet for every 10 workers. Requires employers who can demonstrate that market availability prevents immediate compliance to provide as many toilet facilities as possible until the ratio is achieved.
- **Prohibits** use of bunk beds by unrelated individuals.
- **Does not change square footage requirements**, but requires that beds be separated by at least six feet or by an impermeable barrier.
- **Requires** common use toilets and handwashing facilities and other high contact common use items to be sanitized at least two times daily, and requires that the employer provide appropriate cleaning materials to enable occupants to keep private living areas clean and sanitary.

- **Notes that COVID-19 requires immediate (day or night) reporting** under existing OHA rules.
Includes provisions related to the isolation of COVID-19 confirmed or suspected cases, including the requirement that the employer ensure food and water is provided to those in isolation.

Transportation

- **Requires at least 3 feet social distancing** be maintained during travel in employer-provided vehicles.
- **Requires that facial coverings be worn by passengers** and by the driver in employer-provided vehicles.
- **Requires high-contact areas** in employer-provided vehicles be sanitized before each trip or at least two times daily if in continuous use.
- **Requires that the employer provide training** to employees about the need to ensure appropriate social distancing when in their personal vehicles.

Financial Assistance for complying with OSHA rules

Agriculture operations can apply for reimbursement of expenses due to compliance with the OSHA rules on the [OWEB website](#). These expenses are divided into three buckets: housing, field sanitation, and transportation.

- These reimbursements include additional rented portable toilets, hand washing stations and face coverings.

ODA's Agriculture and Farm Operation Response [Toolkit](#)

Step 1: Protect the Current Workforce

- Display Information and Educational Materials
- Communicating COVID-19 Seriousness with Workers
- Optional Screening of Workers
- Direct Sick Workers to Stay Home
- Physical Distancing
- Personal Protective Equipment (PPE)
- Handwashing, sanitizers and sanitation
- Cleaning, Sanitation, and Disinfection of Surfaces

Step 2: Prepare the Current Workforce

- Educate Workers and Supervisors, Providing Information in Multiple Languages As Needed
- Cross-training, Protocols, and Back-Up Plans

Step 3: Prepare for an Impacted or Reduced Workforce

- Recruit and train new contingency workers
- Prepare to function with a reduced workforce

General Organizational and Administrative Measures

REQUIRED practices

- **Physical Distancing (REQUIRED)**
Employers must assign one or more “social distancing officers” to establish, implement, and reinforce social distancing policies while at work. The social distancing officer should also monitor social distancing of employees on break, around the picking bins and during meal periods or any other areas where employees typically congregate.
- **Face Covering Policy (REQUIRED)**
Masks, face shields, or face coverings are REQUIRED when working within six feet of other workers, even when working outside. Vineyards must implement a Face Coverings Policy, and [associated training](#), to mitigate the spread of the virus. If physical distancing of six feet cannot be maintained in the vineyard, face masks must be worn.

RECOMMENDED practices

- Assign a “workplace coordinator” to be the key contact for managers, employees, and government officials in the event that an employee tests positive for COVID-19. The coordinator should remain up to date on government regulations and guidance and particularly in large vineyard situations, establish communication with [Local Public Health Officials](#) who may be very helpful in testing and resources for isolation and understanding what your organization has done to prepare.
- Create a written emergency response plan on how to respond if a worker tests positive for COVID-19. An example emergency response plan is available upon request.
- Establish a confidential process for employees to report personal illness and contact with individuals that have COVID-19 or flu-like symptoms (e.g. fever, cough, etc.).
- Develop an emergency operational plan for continuing business with a reduced workforce
- Educate Employees – Conduct weekly employee training on workplace safety, and daily reminders to report illness, proper use of PPE, safe transportation of employees in employer supplied vehicles as examples.
- Especially for larger operations, develop an emergency communications plan including what pro-active steps you have taken, standby statements, B-roll of workers actively engaged in complying with new rules and guidance and spokesperson identification.

Screen & Monitor Workers (RECOMMENDED)

- Vineyards should educate employees on [COVID-19 symptoms](#) and direct employees with COVID-19 symptoms to stay home (education is key to keep the workplace safe).
- Vineyards may choose to give employees a thermometer, or check temperatures of employees as they arrive to work, and provide them with a daily checklist of symptoms and ask that they self-monitor before coming to work.
 - Instruct employees in use of thermometer and create a procedure for sanitizing the thermometer after each use.
 - Symptom screening and temperature monitoring may help catch cases early. Screening station guidance can be found on the CDC webpage at: <https://www.cdc.gov/coronavirus/2019-ncov/community/general-business-faq.html>.
 - If you screen at entry, screen all employees, including management, as well as visitors, contractors and delivery drivers entering the facility.
 - Create a check in for each person arriving at the site where they take their own temperature. 100.4 F degrees is the recommended temperature threshold for when an employee should not start working. Consider the weather if you are temperature screening. It may be appropriate to have the employee sit in the shade for several minutes and then to recheck the temperature.
 - Consider checking temperature at the start of and the end of the work day.
 - Ensure employee providing screening follows precautions such as using a face covering plus a faceshield as well as social distancing.
 - If records related to screening are kept, worker privacy and record retention should be considered.
 - At the beginning of the work day talk to the employees about how they are feeling. Remind them of the symptoms of COVID-19.
 - Remind them that if one of their workmates is sick they should encourage them to stay home
- Encourage workers to think about the decisions they make outside of work with regard to social distancing and face coverings.

Hand Hygiene (RECOMMENDED) –

- Reinforce that meticulous hand hygiene is a critical measure for preventing infections. This includes frequent and proper handwashing; soap and water for at least 20 seconds and/or the use of hand sanitizers.

Meals and Break Time (RECOMMENDED)

- Encourage more breaks for water to stay hydrated and avoid heat illness.
- Stagger breaks and meal periods with cohort groups taking breaks together.
- Provide safe place for meals & breaks that allows for employees to maintain physical distancing of 6’.
- Move break areas into well ventilated or outdoor areas.
- If tables are provided, sanitize meal areas between employees.

- Employees should wear gloves when performing cleaning, sanitizing, or disinfecting and follow all product label directions.

Infection Prevention Measures (RECOMMENDED)

- Provide handwashing stations or hand sanitizers (60-95% alcohol content) with the crew supervisor for employees including in entry areas, meal and break areas, near bathrooms, and in the vineyard.
- Use [EPA-registered disinfectants](#) on frequently touched surfaces such as door knobs, countertops, bathroom surfaces, kitchen surfaces, telephones, tractors etc...
- Restrict use of any shared items or equipment and require disinfection of equipment between uses.
- Place sanitizing liquid (60% or more by volume alcohol content) spray bottles around the work area including near doors, with tractor operators and crew supervisors, and close to other frequently touched surfaces like portable toilets, hand washing stations and water stations. Except for portable toilets and hand washing stations in the field which need to be sanitized three times a day, instruct employees to spray down surfaces after use.

Cleaning and Disinfection of Surfaces (RECOMMENDED)

- Use [EPA-registered disinfectants](#) on frequently touched surfaces such as door knobs, alarm keypads, employee time clock, handrails, shared countertops/workstations, tools, equipment controls, bathroom surfaces etc...
- Always read and follow the directions on the disinfectant label to ensure safe and effective use.
 - Wear skin protection and eye protection for potential splash hazards
 - Ensure adequate ventilation
 - Use no more than the amount recommended on the label
 - Keep surface wet for a period of time (see product label)
 - Use water at room temperature for dilution (unless stated otherwise on the label)
 - Avoid mixing chemical products
 - Label diluted cleaning solutions

Conduct Periodic Hazard Assessments (RECOMMENDED)

These assessments should be done whenever there is a change in work processes and periodically to ensure all safety measures are in place to prevent the spread of COVID-19. It is not required to be in writing but documentation of the assessment would be a best practice. You may also wish to schedule an Oregon OSHA [consultation](#).

Optimize Ventilation in inside Workplaces (RECOMMENDED)

- Work outside whenever possible
- For indoor workplaces, consult with an HVAC professional to
 - Investigate the ability to safely increase the percentage of outdoor air supplied through the HVAC system (requires compatibility with equipment capacity and environmental conditions).
 - Investigate increasing filtration efficiency to the highest level compatible with the HVAC system without significant deviation from designed airflow.
- Move close contact operations outside or into well-ventilated indoor areas.
- Open doors & windows.
- Set ventilation in shared vehicles, to utilize more outside air.
- Leave bathroom fans on during the day.

Ideas to Consider for work with Farm Labor Contractors (FLC)

- Make contractors aware of Temporary OSHA rules and other COVID needs and document communication
- Ensure the FLC and their crew work within the guidelines and rules set forth in the OSHA temporary rule.
- Have FLC read this document

Ideas to Consider for Administrative team and employees working inside

- Reduce the frequency of paperwork passed between individuals. Oregon Department of Weights and Measures does not require that weigh tags be signed by delivery drivers.
- Consider alternative methods for work orders such as online systems or posting work orders on the wall near where work will take place.
- Modify employee schedules to reduce unnecessary close physical contact.
- Use physical barriers or modify workstations, work procedures, or hours and shifts to increase the distance among employees.
- Add additional clock in/out stations
- Bring all checks to the field rather than having employees come to a central office to collect paychecks

Ideas to Consider for Vineyard employees working in the field

- Create a harvest team cohort including picking team, leaf pullers, tally recorder and tractor operator. Keep them together at all times.
- Collect and sanitize harvest shears and any shared equipment at the end of each day
- Have buckets dedicated to each staff member, don't share buckets or leave them at end rows. Mark with employee name.
- Do not use a punch card system for tallying buckets picked during harvest. Instead use a 'call out' system or face recognition or other no touch system to tally.
- Consider smaller picking crews and increase number of bins being picked in to at one time. Smaller bins? Bins staged on the ground rather than on trailers or fewer bins per trailer.

- Consider plexiglass or saran wrapped PVC pipes between leaf pullers if using bins on a trailer
- Create a plan to for clean fruit arrival at the winery: some options are 1) pre-deleafing just prior to harvest, 2) sorting tables in the field, 3) more bins in the field to pick into at one time 4) understanding with winery that leafing will be handled on the sorting line in the winery rather than in the field or other
- Suggest each employee bring their own water to minimize shared use of water cooler.
- Educate workers on proper use of PPE, handwashing , cough etiquette, good personal hygiene and social distancing
- Keep a waste bin in the field with the crew at all times to minimize the crew clean up at the end of the day
- Tractor operators should have a spray bottle of sanitizer to sanitize tractor touch locations before and after each use.
- Gloves give workers a sense of false security, if using gloves reinforce the need to still wash hands regularly, practice good hygiene and social distance
- Cleaning buckets at the end of the day can be done using detergent. It is a very good cleaner.

Key New Regulatory Requirements Enforcable by Law for Farm Workers

Oregon OSHA Temporary Rules for [Oregon Occupational Safety and Health : COVID-19 and Oregon OSHA : COVID-19 : State of Oregon](#) Farm Workers

Key Guidance Documents

ODA Agriculture and Farm Operation Response Toolkit

The Oregon Department of Agriculture has provided [guidance](#) for Agricultural Operations

CDC Guidance for Manufacturers

The Center for Disease Control (CDC) has provided [guidance](#) for manufacturing facilities.

OSHA Guidance for Preparing Workplaces

The Occupational Safety and Health Administration (OSHA) has provided [guidance](#) for employers at the federal level.

[Oregon OSHA Temporary Administrative Rule Addressing the COVID-19 Public Health Emergency in Labor Housing and Agricultural Employment](#)

OHA Guidance for Employers

The Oregon Health Authority (OHA) continues to update their [Oregon General Guidance for Employers on COVID-19](#).

Oregon Food Processing Toolkit & Playbook

The Oregon [Food Processing COVID-19 Prevention Toolkit](#) was developed as a joint effort between Oregon Food Processors and OHA, Oregon Department of Health (ODA), and Oregon OSHA to provide guidance for food processors in developing a plan for mitigating the spread of COVID-19 in the workplace.

The Oregon [Food Processing COVID-19 Response Playbook](#) was developed to establish the coordination and response efforts of the ODA, Oregon OSHA, and OHA when one or more cases of COVID-19 are identified in a food processing facility.

Contact Information

[Local Public Health Authority \(LPHA\)](#) – CD [Communicable Disease] Nurse or After-Hours CD columns. It is strongly encouraged that any plan include communication with your LPHA. There may be collaborative opportunities available. o LPHA may have capability to provide testing resources related to symptomatic individuals or outbreaks in the workplace
o Contract tracing resources to support identified COVID positive exposure
o Access to resources related to isolation in the community

[Oregon OSHA Consultative Services](#) – education and outreach regarding workplace safety and health regulations, including those from Executive Orders.

[Oregon Department of Agriculture](#) – education and outreach regarding maintaining a safe and stable food supply.

Vineyard Operations Guidelines - COVID-19 Checklist

Organizational and Administrative Measures

- Assign a designated “social distancing officer” to establish, implement, and enforce social distancing policies
- Assign a workplace coordinator to be the key contact for managers, employees, and government officials in the event that an employee tests positive for COVID-19
- Create a written emergency response plan detailing how to respond if a worker tests positive for COVID-19
- Develop and communicate a sick leave policy based on FFCRA guidelines
- Update your company PPE policy and include guidance on face coverings to mitigate transmission in the workplace

Operational Measures

- Establish physical distancing protocols
- Form consistent cohorts to work together including pickers, leafers, tally takers, tractor operators
- Create alternative methods to reduce the transfer of paperwork at end of picking day
- Keep all work outside when possible and increase ventilation in indoor spaces

Infection Prevention Measures

- Ensure availability of employee hand washing facilities, install hand sanitizers (>60% alcohol)
- Require employees to wear face coverings based on government guidelines and company PPE Policy
- Plan and implement controls for unavoidable close contact, such as clear dividers or use of face shields while sorting out leaves and grapes in the field
- Plan for truck drivers to remain in the forklift while loading fruit and then in the truck outside of that time. Have no interaction with the cohort working in the field

Cleaning and Sanitization Guidelines

- Develop a schedule and checklist to routinely clean/disinfect all high frequency touch-points
- Educate employees on the difference between cleaning, sanitizing, and disinfection
- Reinforce: disinfecting all surfaces in a vineyard operation is impossible; instruct employees to wash or sanitize hands often and avoid touching their face

Personnel Illness Management Guidelines

- Implement a “stay home” policy for employees that are sick or have COVID-19 symptoms
- Establish a confidential process for employees to report personal illness or contact w/ COVID-19
- Establish a process for managing employees with potential COVID-19 exposure or infection
- Establish guidelines for when an employee that has been in “isolation” may return to work

Break & Meal Periods

- Encourage more breaks for water to stay hydrated and avoid heat illness
- Stagger breaks and meal periods with cohort groups taking breaks together
- Provide well-ventilated or outdoor space for meals and breaks with individual or otherwise socially distant seating.

Education

- Post signs, e.g. 1) [COVID-19 Symptoms, people with symptoms to stay home](#), 2) [Requirement for Face Coverings](#), 3) [Requirement for Physical Distancing](#), 5) [Personal Protection Guidelines](#) and 6) [COVID-19 Risk Awareness](#)
- Reinforce meticulous hand hygiene, avoiding close contact, and avoiding using other employee’s picking buckets and shears
- Provide workers with education and training on: COVID-19 Risk Factors, Physical Distancing Protocols, Operational Measures, and Illness Management