

# Summary of Proposed for 2024

## GAPC Certification Program (Tobacco and Hemp)

### LABOR MANAGEMENT: FARM SAFETY

<b>Purpose</b>	Update GAP Standards and Questions to follow OSHA Rule expanding submission requirements for injury, illness data provided by employers in high-hazard industries (agriculture being considered a high-hazard industry).
<b>Background</b>	<p>On July 7, 2023, the US Department of Labor announced a final rule that will require certain employers in designated high-hazard industries to electronically submit injury and illness information – that they are already required to keep – to the department’s Occupational Safety and Health Administration (OSHA).</p> <p>The final rule takes effect on January 1, 2024, and now includes the following submission requirements:</p> <ul style="list-style-type: none"> <li>• Establishments with 100 or more employees in certain high-hazard industries must electronically submit information from their Form 300-Log of Work-Related Injuries and Illnesses, and Form 301-Injury and Illness Incident Report to OSHA once a year. These submissions are in addition to the submission of Form 300A-Summary of Work-Related Injuries and Illnesses.</li> <li>• To improve data quality, establishments are required to include their legal company name when making electronic submissions to OSHA from their injury and illness records.</li> </ul> <p>The final rule retains the current requirements for electronic submission of information from Form 300A from establishments with 20-249 employees in certain high-hazard industries and from establishments with 250 or more employees in industries that must routinely keep OSHA injury and illness records.</p>
<b>Current Standard Language</b>	From February through April, growers must post a summary of the injuries and illnesses recorded the previous year (OSHA Form 300A)
<b>Proposed Standard Language</b>	<p>Operations with 20-249 workers must submit Summary of Work-Related Injuries and Illnesses (OSHA Form 300A) to OSHA electronically through the Injury Tracking Application by March 2.</p> <p>Operations with 100 or more workers, must submit Log of Work-Related Injuries and Illness (OSHA Form 300) and Injuries and Illnesses Incident Report (OSHA Form 301) through the Injury Tracking Application by March 2.</p>

<b>Current Question</b>	(c) If operation has 20-249 workers, was the <u>previous year's</u> OSHA Form 300A submitted by March 2 through the Injury Tracking Application?
<b>Proposed Question</b>	(f) If operation has 100 or more workers, was the <u>previous year's</u> OSHA Form 300 submitted by March 2 through the Injury Tracking Application?  (g) If operation has 100 or more workers, was the <u>previous year's</u> OSHA Form 301 submitted by March 2 through the Injury Tracking Application?

## LABOR MANAGEMENT: TRAINING

<b>Purpose</b>	Clarify the requirements on annual worker training and to improve documentation of annual worker training.
<b>Current Standard Language</b>	<p><b>CRITICAL STANDARDS</b></p> <p>Grower documents training to farm workers on the hazards and risks associated with CPAs, safe working practices, emergency response and health surveillance including:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Heat Stress</li> <li><input type="checkbox"/> Farm Safety, including Farm Equipment Safety and First Aid</li> <li><input type="checkbox"/> Carbon Monoxide Poisoning Prevention (if applicable)</li> <li><input type="checkbox"/> Pesticide Safety and Personal Protective Equipment (PPE)</li> <li><input type="checkbox"/> Green Tobacco Sickness (GTS)</li> <li><input type="checkbox"/> Emergency response procedures</li> <li><input type="checkbox"/> Recognition of REI</li> <li><input type="checkbox"/> Storage, handling, application, and disposal of CPAs</li> <li><input type="checkbox"/> NTRM Prevention</li> </ul> <p>Grower follows all requirements of state and national regulations and training requirements related to worker protection and CPA use.</p> <p><b>ADDITIONAL STANDARDS</b></p> <p><i>High</i></p> <p>Grower documents training to farm workers on:</p> <ul style="list-style-type: none"> <li>○ Proper baling and market separation of tobacco</li> <li>○ AIR &amp; FIRE ONLY: Grade separation</li> </ul>

<p><b>Proposed Standard Language</b></p>	<p><b>CRITICAL STANDARDS</b>  Grower documents <b>annual</b> training to <b>all</b> farm workers <b>including the farm workers name, signature, and signature date (i.e. training date)</b> on the hazards and risks associated with CPAs, safe working practices, emergency response and health surveillance including:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Heat Stress</li> <li><input type="checkbox"/> Farm Safety, including Farm Equipment Safety and First Aid</li> <li><input type="checkbox"/> Carbon Monoxide Poisoning Prevention (if applicable)</li> <li><input type="checkbox"/> Pesticide Safety and Personal Protective Equipment (PPE)</li> <li><input type="checkbox"/> Green Tobacco Sickness (GTS)</li> <li><input type="checkbox"/> Emergency response procedures</li> <li><input type="checkbox"/> Recognition of REI</li> <li><input type="checkbox"/> Storage, handling, application, and disposal of CPAs</li> <li><input type="checkbox"/> NTRM Prevention</li> </ul> <p>Grower follows all requirements of state and national regulations and training requirements related to worker protection and CPA use.</p> <p><b>ADDITIONAL STANDARDS</b>  <i>High</i>  Grower documents <b>annual</b> training to <b>all</b> farm workers <b>including the farm workers name, signature, and signature date (i.e. training date)</b> on:</p> <ul style="list-style-type: none"> <li>○ Proper baling and market separation of tobacco</li> <li>○ AIR &amp; FIRE ONLY: Grade separation</li> </ul>		
<p><b>Current Question</b></p>	<p>Is there documentation verifying that workers received instruction on heat stress?</p> <p>Is there documentation verifying that workers received instruction on general farm safety and safe operation of farm equipment and machinery, and first aid?</p> <p>Is there documentation verifying that workers received instruction on (for dark-fired operations only)</p>	<p><b>Proposed Question</b></p>	<p>Is there documentation verifying that <b>all</b> workers received instruction on heat stress <b>within the last year including the farm workers name, signature, and signature date?</b></p> <p>Is there documentation verifying that <b>all</b> workers received instruction on general farm safety and safe operation of farm equipment and machinery, and first aid <b>within the last year including the farm workers name, signature, and signature date?</b></p> <p>Is there documentation verifying that <b>all</b> workers received instruction on (for dark-fired operations only) prevention of</p>

	<p>prevention of carbon monoxide poisoning?</p> <p>Is there documentation verifying that workers received instruction on use of PPE (Personal Protective Equipment)?</p> <p>Is there documentation verifying that workers received instruction on Green Tobacco Sickness (GTS) (symptoms and treatments)?</p> <p>Is there documentation verifying that workers received instruction on emergency response procedures?</p> <p>Is there documentation verifying that workers received instruction on recognition of REI?</p> <p>Is there documentation verifying that workers received instruction on storage, handling, application, and disposal of tobacco CPAs?</p> <p>Is there documentation verifying that workers received instruction on required worker protection standard training?</p>		<p>carbon monoxide poisoning <b>within the last year including the farm workers name, signature, and signature date?</b></p> <p>Is there documentation verifying that <b>all</b> workers received instruction on use of PPE (Personal Protective Equipment) <b>within the last year including the farm workers name, signature, and signature date?</b></p> <p>Is there documentation verifying that <b>all</b> workers received instruction on Green Tobacco Sickness (GTS) (symptoms and treatments) <b>within the last year including the farm workers name, signature, and signature date?</b></p> <p>Is there documentation verifying that <b>all</b> workers received instruction on emergency response procedures <b>within the last year including the farm workers name, signature, and signature date?</b></p> <p>Is there documentation verifying that <b>all</b> workers received instruction on recognition of REI <b>within the last year including the farm workers name, signature, and signature date?</b></p> <p>Is there documentation verifying that <b>all</b> workers received instruction on storage, handling, application, and disposal of tobacco CPAs <b>within the last year including the farm workers name, signature, and signature date?</b></p> <p>Is there documentation verifying that <b>all</b> workers received instruction on required worker protection standard training <b>within the last year including the farm workers name, signature and signature date?</b></p>
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	<p>Is there documentation verifying that workers received instruction on NTRM Prevention?</p> <p>Is there documentation verifying that workers received instruction on proper baling and market preparation of tobacco?</p> <p>Is there documentation verifying that workers received instruction on (for air-cured and fire-cured operations only) grade separation?</p>		<p>Is there documentation verifying that <b>all</b> workers received instruction on NTRM Prevention <b>within the last year including the farm workers name, signature, and signature date?</b></p> <p>Is there documentation verifying that <b>all</b> workers received instruction on proper baling and market preparation of tobacco <b>within the last year including the farm workers name, signature, and signature date?</b></p> <p>Is there documentation verifying that <b>all</b> workers received instruction on (for air-cured and fire-cured operations only) grade separation <b>within the last year including the farm workers name, signature, and signature date?</b></p>
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