



Blood and Bodily Fluids Policy

Blood and bodily fluids on produce are a serious threat to food safety. For the health of the worker and the safety of the produce, growers need to be aware of when workers are bleeding and take prompt remedial action.

This guidance document addresses blood and bodily fluid concerns and offers a blood and bodily fluids policy boilerplate that can be adapted to your farm. The episode also talks about key features of the first aid kit your workers have access to.

Workers need to understand and internalize the importance of reporting any injury to their supervisors. The auditor will also want to see this importance expressed in the Food Safety Manual. Below you'll find sample boilerplate language on a blood and bodily fluids policy from the Northwest Michigan Horticultural Station GAP Manual.

Blood/Bodily Fluid Policy

Employees are to immediately stop work and notify their supervisor/designee if any commodity comes into contact with blood or other bodily fluid, (human or animal). The supervisor/designee is instructed to destroy/dispose of the contaminated product, clean/sanitize food contact surfaces, and complete the blood and bodily fluid log sheet.

It is important that a record be kept of the number, type and treatment of all injuries on the farm. You'll notice a reference in the policy to a blood and bodily fluid log sheet. You can find a sample copy of this illness and injury log sheet in this episode's show notes.

Having first aid kits available to workers at all times is also critically important. If it is not convenient to seek first aid, workers will be more likely to continue working and risk contaminating the crop. You may wish to either equip supervisors with a first aid kit or place a first aid kit next to a handwashing station.

In your Food Safety Manual, a first aid policy should be included to ensure a process is in place to deal with first aid. It should enumerate that all cuts and abrasions should be both treated (bandaged) then covered with a glove prior to returning to work. A sample First Aid Policy from the Northwest Michigan Horticultural Station GAP Manual is included on the back.



First Aid Policy

Employees are instructed and encouraged to seek prompt treatment from a supervisor/ designee with clean first aid supplies for cuts, abrasions, and other injuries no matter how minor. All cuts and abrasions must be properly covered before the employee returns to handling food or working around food contact surfaces. All injuries, no matter how mild will be recorded on the Illness and Injury Log sheet. First aid kits will be monitored periodically during harvest to ensure adequate supplies.

All first aid kits should contain bandages, ointment and gloves (nitrile, latex or another surgical type). Larger sized bandages, scissors or surgical tape are convenient and may also be included. During harvest season, it is important to monitor first aid kits and replace contents that are missing. As with any monitoring, there needs to be an associated written record of the monitoring and if any contents were replaced.

You will find a sample Blood and Bodily Fluid Log Sheet in the show notes. As always, you will want to alter these and the associated policies for the size and scope of your operation.

As has been said before, the auditor is looking for evidence of a system written in the Food Safety Manual to minimize incidence of foodborne illness, visual evidence that it is taking place and documentation that it has been taking place in the past. Writing the Blood & Bodily Fluids and the First Aid Policies is the first step. Implementing the practices on your farm is the next step. Documenting that you check the first aid kits regularly during harvest is the final step.