**International Dairy Foods Association**

Environment, Health and Safety Committee

May 3, 2022

12:00 – 1:00 PM EST

**Attendees:** Pat Cardiff, Dave Crowley, Larry Cuomo, Anne Divjak, Kathy Kenyon, Tim Kreuger, David Lahrs, Daniel Liddell, Doug Martin, Kim May, Blane Morgan, Jim Turek

**Chair:** Blane Morgan

**IDFA Staff:** Danielle Quist, Taylor Boone

**Safety Message:** Dave Crowley shared a message regarding fire safety - Everyone should know what they need to take with them and have an evacuation plan in place regardless of whether a fire occurs at work, home or other place where you stay.

**OSHA Heat National Enforcement Program:** Quist noted that General Manufacturing NAICS codes are listed as priority. but no specification for dairy. Members discussed various methods for measuring heat.

* Some use humidity factor to identify when you need to modify the break regime during periods of high temperatures
* Wet bulb globe temperature (WBGT) monitoring devices can also be used, but they are very costly and require data logs and software. Some companies using WBGT use it as a tool to report continuously for several days to establish a baseline estimate. Others use it when conducting specific studies in parts of the plant.
* Members questioned the value and accuracy of monitoring area heat because people move between areas and OSHA does not recognize area monitoring. Also, workers can perceive heat and noise much higher than reality.
* Danielle emphasized that organizations need to distinguish between investigation and monitoring activities. Dave Crowley will share a whitewash document on heat monitoring for those interested. Blane Morgan will also share a document

**OSHA Alliance development of best practices papers** – 2 safety topics

**Objective 3:**  Develop and disseminate information on the recognition and prevention of workplace hazards, such as but not limited to, vehicle back-overs or rollovers, and gaining safe access for personnel to the top of tank trucks.

* Share with in-house counsel
* Share best practices with Danielle to identify additional work we may need to do. She will also reach out to OSHA for suggestions

**Infectious Disease Standard**

* Not related to COVID-19 but there is language in current OSHA documents that indicate the proposal may be published this year. OSHA began an infectious disease standard in response to the H1N1Flu in 2009. Proposal will likely be influenced by OSHA’s low opinion of how some manufactures protect workers, i.e. meat packers.

**OSHA Regulatory Updates**

* Updates to the LOTO program expected to be proposed Fall 2022
* Proposed revised overtime rule expected any day.

**Sharing Re: Inspections**

* A company shared that one location recently received an anonymous employee complaint regarding inconsistent isolation and quarantine practices in relation to COVID-19. The employee had identified a specific department, and this serves as a warning to maintain consistent practices and decision making. The company responded with records.
* Region 2 national enforcement program - Danielle shared a link to resources that were a product of that program last year that could be helpful
* Another company shared that CalOSHA has been conducting inspections targeting document control. CalOSHA examined how companies made policy revisions since Covid 19 started, digging back in time looking for problems with company PPE guidelines for COVID Prevention. CalOSHA mandating retroactive assessments and penalties based on old. COVID-19 penalties and citations are being issued based on violations from a year ago
* Companies generally commented that inspectors have been unreasonable, asking for documents before they even visit a facility or writing out abatements for hazards but not explaining what they are.
* One company had an incident where an inspector was asking the receptionist about their COVID-19 precautions policy before contacting the appropriate staff.
* Another member received a citation for not keeping equipment in not working order, even though they abated the issue before the inspector had arrived on site (Can’t fix something that isn’t broken)
* One company advises not to be afraid of informal inspection.

**Action Items**

* Topics for Improvement
  + Policies, information, or sharing?
  + Fall protection https://www.osha.gov/stop-falls-stand-down
    - Send information to Danielle ([dquist@idfa.org](mailto:dquist@idfa.org)) to be addressed in the next meeting
* Workshop type of organized meeting to prevent too much time being used during the first half of the meeting
  + Danielle, Blane Morgan, and Dave Crowley will meet on this issue.

June 7 Fall protection discussion

July 5- PFAS environmental compliance topic

August 2 – Safe & Sound webinar aimed at front-line workers and safety teams that will be subject to the survey.