

## **Worker Safety Management on Dairy Farms: Current Issues, Challenges, & Solutions**

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In recent years the U.S. dairy industry has seen a heightened emphasis on worker health and safety. Dairy operations in the U.S. continue to have high worker injury and fatality rates as compared to general industry and other agriculture operations. As a result, Occupational Safety and Health Administration (**OSHA**) Local Emphasis Programs (**LEP**) for programmed inspections of dairy farms in Wisconsin and New York have been established. Additionally, dairy-specific safety legislation was introduced in Washington State due to rising injury and fatality rates on dairy farms. As a result of increased attention on dairy farms, producers are evaluating their own worker health and safety management programs.

### **OWNER-MANAGER LEADERSHIP AND COMMITMENT**

The fundamental tenet to any dairy farm safety program is that owners and managers must understand that the safety of employees is an integral component of doing business. Managers must accept the responsibility of stimulating awareness of safety among workers, and also demonstrate a commitment to the safety of workers. Each manager and supervisor must assume the responsibility for the safety of his or her own personnel, and must be given the necessary authority to fulfill that obligation.

A safety program must always start with owners and top management. Owner and manager attitude toward injury prevention is almost invariably adopted by supervisors

and employees. If owners and managers are not genuinely interested in preventing injuries, others working on the farm will not be interested as well. Owners or managers owe it to themselves and to their employees not only to promote safety and safe working environments, but also to provide a safety policy with written operating procedures that are aggressively enforced.

A prime requisite for any safety program is to leave no doubt in the mind of the dairy workers that management is concerned about the prevention of injuries on the farm. Owners and manager commitment to worker safety must be demonstrated in the form of a written policy statement and made known to all levels of management and workers alike. This policy should outline the organization's aims and objectives for its safety program and should designate the authority and responsibilities for their achievement. The policy should be given wide publicity and should establish both management and worker responsibilities in the program. The mechanism of delivery of this policy should be as important as the clarity with which it identifies functional authority and responsibility, especially given that the working population in the dairy industry is made up of low-literacy, non-English speaking workers.

The establishment of responsibility for safety at each level of management forges an unbroken chain of accountability from the owner of the dairy down to the supervisor. This accountability must be extended in direct line through each work

area to each worker. Dairy managers must see to it that this responsibility is fully accepted by all workers, and hold supervisors accountable for the safety performance of their respective areas of responsibility.

A common attitude is that safety is everyone's responsibility. This is generally true, but common and statute law dictate that the safety of the worker is a management responsibility. Those in ultimate control of the organization must regard the provision of a safe workplace as a fundamental principle in their relation with their employees. Successful safety programs have one thing in common: there is a deep-seated commitment by top management. Such commitment filters down through the organizational hierarchy to the workers.

### **EMPLOYEE PARTICIPATION**

A second tenet of any successful dairy farm safety program is to ensure worker participation in the safety program. Dairy workers are the first line of defense against safety concerns on a farm. They are on the front lines and they witness more safety offenses and violations than what supervisors can observe. Since workers are often those closest to the hazards, and have the most first-hand knowledge of workplace hazards, they also often have the best ideas for improving safety. Employee participation means that workers are encouraged to participate in the safety program. Clearly, the employer has ultimate responsibility for its workers; however, using employees' knowledge, observations, and experience to help identify and resolve problems can make the system more effective. Examples of how dairy workers can be included in the safety program include:

- Incident investigations
- Procedure development
- Development and implementation of safety training
- Job safety analysis
- Safety and health committee/team involvement
- Safety-specific recommendations

At a minimum, a mechanism should exist for workers to identify and report safety concerns on the farm without fear of reprisal or punishment. These reported issues should be addressed in a timely fashion, which will communicate to workers that safety is a high priority for owners and managers.

### **HAZARD IDENTIFICATION AND CONTROL**

Since owners and managers control all aspects of the dairy including hiring, training, production, quality control, and a variety of other activities common to dairy operations; they must also control the recognition, evaluation, and control of workplace hazards. The same standards for achieving production, quality control, and a host of other dairy-related objectives should also be used for achieving worker health and safety objectives. Managers must be involved in the activities required for planning, organizing, and controlling job-related health and safety activities. All managers and supervisors must be held accountable for all specific safety responsibilities which cannot be delegated downward. To be most effective, the focus of manager safety efforts should be on hazard control, rather than on accidents. The control of hazards on the dairy farm requires the application of good, sound, basic management skills. Cost-conscious farms have learned that they must control injury incidents and their costs if they are to do

business in today's highly competitive dairy market.

## **EDUCATION AND TRAINING**

Training is one of the most important elements of any safety program. Safety training allows employees to learn their job properly, brings new ideas into the workplace, reinforces existing ideas, and puts a safety program into action. Inadequate safety training content and inadequate instruction are two factors directly related to safety training, and can be compounded by a language barrier. Cultural, linguistic, and attitude barriers should be addressed in safety trainings of foreign-born workers. Owners and managers should mandate that all employees participate in safety trainings, and their attendance and participation should be documented.

OSHA mandates that if an employee does not speak or comprehend English, instruction must be provided in a language the employee can understand. Similarly, if the employee's vocabulary is limited, the training must account for that limitation. By the same token, if employees are not literate, telling them to read training materials will not satisfy the employer's training obligation. As a general matter, employers are expected to realize that if they customarily need to communicate work instructions or other workplace information to employees at a certain vocabulary level or in a language other than English, they will also need to provide safety and health training to employees in the same manner. OSHA compliance officers are responsible for checking and verifying that employers have provided training to employees. In addition, compliance officers must check

and verify that the training was provided in a format that the workers being trained could understand.

## **SAFETY PROGRAM RECOMMENDATIONS**

Today, it is imperative that owners and managers become involved and participate in farm safety programs because of the vast scope and potential consequences of state and federal legislation dealing with occupational safety and health. The role of safety on the U.S. dairy farm is exemplified by the number and variety of regulations, laws, and court decisions. Therefore, the fundamental elements of a dairy farm safety program include the following:

- 1) Owners and top managers must provide a forceful and continuous leadership role in the safety program.
- 2) Work environments on dairy farms must be made safe, free of recognized hazards known to cause injury, illness, or fatality among workers. This involves implementing a mechanism to identify, recognize, and control hazards known to cause injuries, illnesses, or fatalities among dairy workers.
- 3) Supervisors must be competent and effective leaders to facilitate safe behaviors among workers.
- 4) Employee participation in injury prevention must be maintained.
- 5) Supervisors and workers must be trained in the recognition and reporting of safety hazards on farms.
- 6) Employees must abide by all safety rules and perform their job duties in a safe manner.

## **RESOURCES**

Dairy Farm Safety website with articles written on safety management and farm hazards.  
<https://sph.uth.edu/dairy-farm-safety/>

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New Mexico State University Dairy Extension website with information on safety training videos. <http://aces.nmsu.edu/ces/dairy/index.html>