

MBAA Safety Tool Box Talk



Safety of Guests, Visitors and Temporary Staff

Overview

Due to fluctuating production demands many breweries use temporary workers during peak times. Breweries may also host tour groups, contractors, service personnel, equipment technicians and hire interns. All of these groups must be considered as part of the brewery's safety program. This talk box covers safety responsibilities of breweries regarding guests, visitors and temporary staff.

Temporary Workers

The most important message here is that *although temporary workers are employed by an outside company it does not absolve the host brewery from safety responsibilities*. The general rules of thumb are; if you control the when, where and how of a temporary employee's work and that work is integral to your business then per OSHA they are your employees. The host brewery and temp agency are jointly responsible for temporary worker safety and could both be held liable for safety violations. Responsibilities can include safety training, accident reporting, PPE, air quality monitoring, access to SDS and emergency action plan, etc., - in other words all the same safety responsibilities the host brewery has towards its regular employees including access to environmental and health sampling results. Accidents to temporary workers must be recorded on OSHA 300 forms as with regular workers. These requirements present a big challenge for host breweries due to the short notice and transient nature of many temporary jobs. Finally, the host brewery cannot charge the temp agency for the PPE, time taken for safety training etc.

Contractor Workers

OSHA does not have definitive guidelines covering the host company's responsibilities for contract worker safety. In general, the responsibility lays with contracting company not the host brewery. However it is good practice to stipulate which party is responsible for contractor safety as part of the work contract signed by both parties. If required, providing a contract worker with a copy of your brewery's emergency action plan that they can read and sign provides good protection in case of an evacuation. Similarly any dangerous situations (stored chemicals, confined spaces, etc.), that are relevant to the work the contractor is doing are best covered by an information sheet outlining the hazards present that the contractor can read and then sign.

Interns, volunteers, guest brewers

Interns, volunteers and guest brewers, whether paid or volunteer, should be treated as regular employees in all safety matters. They need to be provided with safety training and PPE. As with temporary employees they need to be covered by accident reporting and should have access to SDS information and environmental and health survey results.

Tour groups

Tour groups should receive a quick safety talk before the tour starts. The group should be warned of specific hazards they may encounter during the tour, (i.e. forklift traffic, trip and slips, hot equipment, etc.). PPE may be appropriate (safety glasses, hearing protection) and should be supplied to the group. A dress code may also be appropriate and could require closed toe shoes and no loose clothing. The group should be advised to stay

together and refrain from using cell phones. Whether to allow children on tours should be carefully considered in light of tour conditions. Finally, a 'safety pathway' for the group to follow through the brewery could be considered as a method of keeping the tour together and at a safe distance from any hazards.

Visitors, including; vendors, cleaning, pest control and uniform service workers, salespeople, consultants, equipment technicians

Visitors should be directed by signage to an appropriate entry point to the brewery and checked in by a staff member. Ideally visitors should be accompanied by a staff member familiar with the relevant hazards while in the brewery. PPE may be appropriate (safety glasses, hearing protection) and should be supplied to the visitor if they do not have their own. Regular visitors such as cleaning, pest control and uniform service personal should be treated similarly to contract workers in that safety responsibilities should be included in the service contractor agreement. Technicians sent out by brewery equipment suppliers should ideally be supervised by a staff member familiar with the relevant hazards or if not possible, treated as a contract worker.

If you have any questions regarding this, please see your supervisor or manager or a member of the Safety Committee.

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BREWERY SAFETY PROGRAMS,
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WEBSITE AT:**

<http://www.mbaa.com/brewresources/brewsafety>