

DOSH DIRECTIVE

Division of Occupational Safety and Health

Department of Labor and Industries

Keeping Washington safe and working

5.96 Hand Protection When Using Knives in Food Processing

(Updated) Date: December 3, 2010

I. Purpose

This directive establishes inspection procedures and enforcement policy related to hand protection when using knives during food processing. Because knives are used in a variety of food processing activities, this directive has been prepared to address questions regarding the application of WAC 296-800-160, Personal Protective Equipment.

II. Scope and Application

This directive applies to DOSH operations statewide and replaces all previous direction, whether formal or informal.

III. References

- WAC 296-800-160, Personal Protective Equipment
- WAC 296-100-16005, Do a hazard assessment for PPE
- WAC 296-800-16010, Document your hazard assessment for PPE
- WAC 296-800-16065, Make sure your employees use appropriate hand protection

IV. Background

WACs 296-800-16005 and 296-800-16010 require employers to conduct hazard assessments to determine whether personal protective equipment is needed, and to certify in writing that such assessments have been completed.

WAC 296-800-16065 requires employers to “make sure employees exposed to hazards that could injure their hands use appropriate hand protection,” and gives examples of covered hazards, including “severe cuts, lacerations or abrasions.”

IV. **Enforcement Policy**

When inspecting food processing operations, the CSHO must review the OSHA 300 log for knife injuries, as well as specific written work procedures and training.

Before issuing any citation for failure to require appropriate personal protective equipment in the form of cut-resistant gloves (regardless of whether the required assessment has been cited), the CSHO must determine that all of the following criteria exist:

- Employees routinely hold food with one hand while cutting with a knife held in the other.
- The cutting is continuous, repetitive, and is a routine task during the worker's shift (this would exclude, for example, citations for infrequent cutting, such as slicing a tomato in preparing a sandwich).
- The establishment has had claims for serious knife cuts, or has overall conditions commonly resulting in serious knife cuts in similar establishments.
 - This would exclude citations based solely on the presence and regular use of knives. In addition, the CSHO must document that other hazards, such as training or work practices, are not effective.

Approved:



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