

HOW YOU WORK MATTERS: Labor Management Standards

RECRUITING, HIRING AND TERMINATION

CRITICAL STANDARDS FOR ALL CERTIFICATIONS

- If there are H-2A workers on the farm obtain and keep a copy(s) of the ETA 790(s) and 790A(s) for all H-2A workers which must include the number of workers, location of employment, name of employer, number of housing units, housing location, and H-2A case number.
- If there are H-2A workers on the farm the grower's name (Primary or Associate), the name of the entity which the individual is a part of (member or employee), or farm location must be listed on the:
 - ETA 790(s) and ETA 790A(s)
 - ETA 9142A(s) (if requested)
- Growers should not employ unauthorized H-2A workers or allow H-2A workers under their employment to work on an unauthorized farm location. H-2A workers are only authorized to work for the employers and at the locations listed on their H-2A contract, the ETA 790 and the ETA 9142A.
- Complete and maintain a Form I-9 for each worker. Once the work commitment has terminated, grower keeps the Form I-9 for either three years after the date of hire, or one year after the date the work commitment is terminated, whichever is longer.¹⁵ Form I-9 is not required for immediate family farm labor¹⁶.

CRITICAL STANDARDS FOR U.S. CERTIFICATION

- If you hire more than 500 man-days of hired labor in any of calendar quarters of last year, at the time of hire of seasonal workers (excludes immediate family farm labor¹⁸ and workers involved in a vocational or apprenticeship program¹⁷) and at the time of recruitment of migrant workers the following must be provided in writing in the worker's preferred language, to include:
 - place of work (with specifics, such as the name and address of the Company or the association),
 - pay rates (including piece rates) to be paid,
 - crops and kinds of activities for which the worker may be assigned,
 - period of work commitment,
 - transportation, housing, and any other worker benefits to be provided, if any, and any costs to be charged for each, and
 - whether state workers' compensation or state unemployment insurance is provided.

¹⁵ See Resource on page 28 in Appendix 2.

¹⁶ Immediate family members includes only: (1) A spouse; (2) Children, stepchildren, and foster children; (3) Parents, stepparents, and foster parents; and (4) Brothers and sisters. If the worker does not fall into one of the four categories listed here then the worker is considered a hired employee per the US DOL definition.

¹⁷ Workers are exempt if they are involved in a vocational or apprenticeship program sanctioned by the Board of Education in the state. Documentation verifying the vocation or apprenticeship program will be required.

CRITICAL STANDARDS FOR INTERNATIONAL CERTIFICATION

- At the time of recruitment and at the time of hire, provide all hired workers (excludes immediate family farm labor¹⁸) a written disclosure describing the terms and conditions of their work commitment written in the worker's preferred language, to include:
 - place of work (with specifics, such as the name and address of the Company or the association),
 - pay rates (including piece rates) to be paid,
 - crops and kinds of activities for which the worker may be assigned,
 - period of work commitment,
 - transportation, housing, and any other worker benefits to be provided, if any, and any costs to be charged for each, and
 - whether state workers' compensation or state unemployment insurance is provided.

ADDITIONAL STANDARDS

High

- Maintain documentation of the number of permanent, local, seasonal, migrant, H2A, and immediate and non-immediate family workers.
- Maintain records concerning any worker who was terminated, the reason for such termination, and report to the proper authorities (important for H-2A). Termination records are not required for immediate family farm labor²¹ and workers involved in a vocational or apprenticeship program¹⁸.

IMMEDIATE FAMILY WORKING ON THE FARM

Immediate family members include only: (1) A spouse; (2) Children, stepchildren, and foster children; (3) Parents, stepparents, and foster parents; and (4) Brothers and sisters. If the worker does not fall into one of the four categories listed here, then the worker is considered a hired worker per the US DOL definition.

CRITICAL STANDARDS FOR US CERTIFICATION

- Comply with all federal and state child labor laws pertaining to immediate family labor.

CRITICAL STANDARDS FOR INTERNATIONAL CERTIFICATION

- Immediate family members ages 15 years of age or younger may only be assigned light, nonhazardous work only if does not interfere with compulsory school.
- Immediate family members ages 16 – 17 cannot be assigned any DOL hazardous tasks (Appendix 1- List A) or other restricted tasks (Appendix 1 – List B).
- Ensure that a responsible adult is always present and supervising the child's work, and that you follow regulations on the number of hours a child is permitted to work.¹⁹ Furthermore, children are not permitted to work at night.

¹⁸ Workers are exempt if they are involved in a vocational or apprenticeship program sanctioned by the Board of Education in the state. Documentation verifying the vocation or apprenticeship program will be required.

¹⁹ The recommended hourly limit for family children 13 to 15 years old is 2 hours per day. For more information see page 30 in Appendix 2.

HIRED WORKERS

Standards in this section do not apply to immediate family farm labor. If your operation hires ANY non-immediate family farm labor these standards will apply to those non-immediate family workers.

CRITICAL STANDARDS FOR US CERTIFICATION

- The grower must obtain the written consent of a youth worker's (under 18) parent or legal guardian prior to work commitment commencing.
- Growers must not engage or obtain services from any person who is younger than 16 years of age. Exceptions for utilizing a person under 16 years of age include the following:
 - Youth excused from compulsory school attendance by applicable law, AND
 - Youth involved in accredited learning programs can be assigned work tasks as long as the tasks relate directly to the learning experiences of the program and are in compliance with law.
- Youth labor that is excused from compulsory school attendance by applicable law, and youth involved in accredited learning programs (apprenticeships or vocational programs) must have verification documentation.
- No hired worker under 18 may be assigned DOL hazardous tasks (Appendix 1 - List A).

CRITICAL STANDARDS FOR INTERNATIONAL CERTIFICATION

- Growers must not employ or obtain services from any person who is younger than 16 years of age.
- No hired worker under 18 may be assigned DOL hazardous tasks (Appendix 1 - List A) or Other Restricted Tasks (Appendix 1 - List B).

ADDITIONAL STANDARDS

High

- If minors are employed on the farm, records that include, at minimum:
 - Name in full
 - Place where the minor lives while employed,
 - Permanent address,
 - Date of birth

WAGE, BENEFITS, AND WORKING HOURS

Standards in this section do not apply to immediate family farm labor²⁰ and workers involved in a vocational or apprenticeship program²¹. If your operation hires ANY non-immediate family farm labor not involved in a vocational or apprenticeship program these standards will apply to those workers.

CRITICAL STANDARDS FOR ALL CERTIFICATIONS

- Ensure that the pay of all workers (including for temporary, piece rates, seasonal, and migrant workers) meet, at a minimum, national and state minimum wage requirements or adverse effect wage if H2A workers.
- Ensure that workers are paid either daily, weekly, or bi-weekly.
- Provide workers with individual written wage statements that remain in their possession for each pay period that include (wage statements are not required for immediate family farm labor):
 - Worker's full name,
 - Worker's address (permanent or seasonal),
 - Worker's social security number (last 4-digits is acceptable),
 - Employer's name,
 - Employer's address,
 - Employer's identification number (entire number),
 - Total pay period earnings,
 - Number of hours worked,
 - Basis on which wages are paid (piece rate if paid on a piecework basis),
 - Number piecework units earned, if applicable,
 - Specific sums withheld, and the purpose of each sum withheld,
 - Net Pay

NOTE: If subject to MSPA, H2A or FSLA, a more detailed statement may be required.
NOTE: This Standard is above U.S. law requirements.
- Compensation must include all time under the grower's direction and control once worker initiates any work activity including short breaks (15 minutes or less) and time used to conduct training. This does not include transportation from housing to field to start and from the field to housing when work is complete.
- All over contract work hours are voluntary and paid in accordance with applicable laws related to wage and working hour requirements.
- All deductions must be in accordance with applicable law.
- Workers must not be subject to any illegal wage withholdings, such as deposits or deductions, for the purpose of recruitment or retention.

²⁰ Immediate family members includes only: (1) A spouse; (2) Children, stepchildren, and foster children; (3) Parents, stepparents, and foster parents; and (4) Brothers and sisters. If the worker does not fall into one of the four categories listed then the worker is considered a hired employee per the US DOL definition.

²¹ Workers are exempt if they are involved in a vocational or apprenticeship program sanctioned by the Board of Education in the state. Documentation verifying the vocation or apprenticeship program will be required.

Labor Posters

Standards in this section do not apply to immediate family farm labor²². If your operation hires ANY non-immediate family farm labor these standards will apply to your operation as applicable.

- Post all legally required labor standards posters where they will be visible to all workers, in a language common to the workers, which sets forth the rights and protections of the workers. ²³ Including but not limited to:
 - Notice of Migrant and Seasonal Agricultural Workers Protection Act (MSPA)
 - Notice of Employee Rights under the Fair Labor Standards Act
 - Employee Rights under the H-2A Program (if H-2A workers work on the operation)
 - OSHA Occupational Safety and Health Poster

FARM LABOR CONTRACTORS(FLCs) /H-2ALCs (Indirect Hired Labor)

Standards in this section apply to operations that indirectly hire labor through a third-party defined by U.S. law as a Farm Labor Contractor or H-2ALC. A Farm Labor Contractor (FLC) is someone who, for money or other valuable consideration, recruits, solicits, hires, employs, furnishes or transports migrant and/or seasonal agricultural workers or, provides housing to migrant agricultural workers. They are often called crew leaders or crew bosses. Anyone in the US who meets this definition of a Farm Labor Contractor as defined by the US Department of Labor must be registered with the US Department of Labor. ²⁴

CRITICAL STANDARDS FOR ALL CERTIFICATIONS

- Ensure no worker under 18 provided by the FLC/H-2ALC is assigned DOL hazardous tasks (Appendix 1 - List A).
- If a grower chooses to work with an individual defined as a FLC or H-2ALC by current U.S. laws, they must be currently registered with the U.S. DOL and have a valid and non-expired Certificate of Registration.
- Obtain and keep a copy of the FLC or H-2ALC's valid and non-expired Certificate of Registration.
- If there are H-2A workers on the farm through a H-2ALC, obtain and keep a copy of the ETA 790(s) and 790a(s) for all H-2ALC workers that work on your farm which must include the number of workers, location of employment, name of employer, number of housing units, housing location, and H-2A case number.
- If there are H-2A workers on the farm through a H-2ALC, the H-2ALC's name must be listed on the:
 - ETA 790(s) and 790A(s)
 - ETA 9142A(s) (if requested)
 - Grower's operation must be listed on work order

²² Immediate family members includes only: (1) A spouse; (2) Children, stepchildren, and foster children; (3) Parents, stepparents, and foster parents; and (4) Brothers and sisters. If the worker does not fall into one of the four categories listed then the worker is considered a hired employee per the US DOL definition.

²³ See Resource on page 28 in Appendix 2.

²⁴ See Resource on page 30 in Appendix 2.

- Growers should not employ unauthorized H-2A workers. H-2A workers are only authorized to work for the employers and at the locations listed on their H-2A contract, the ETA 790(s) and 790A(s) and the ETA 9142A(s).
- If there are H-2A workers on the farm through a H-2ALC, there must be a contract between the grower and the H-2ALC. The contract is required by U.S. DOL when the H-2ALC requests H-2A workers.
- If there are H-2A workers on the farm through a H-2ALC, a copy of the contract between the grower and the FLC must be provided. The contract is required U.S. DOL when the H-2ALC requests H-2A workers.
- If there are H-2A workers on the farm through a H-2ALC, the H-2ALC must have a surety bond that covers liability incurred during the term of the worker contract period listed on the H-2A application and must remain in effect for a period of at least 2 years from the expiration date of the labor certification.
- If there are H-2A workers on the farm through a H-2ALC, the grower must have proof of a surety bond that covers liability incurred during the term of the worker contract period listed on the H-2A application and must remain in effect for a period of at least 2 years from the expiration date of the labor certification.
- If the FLC or H-2ALC is housing workers, they should be authorized to house on their Certificate of Registration.
- Obtain and keep a copy of the housing inspection if FLC or H-2ALC is authorized to house.
- If the FLC or H-2ALC is transporting workers, they should be authorized to transport on their Certificate of Registration.
- If FLC or H-2ALC is transporting workers, they should be authorized to transport on their Certification of Registration.
- If FLC or H-2ALC is transporting workers, they must be insured.
- Obtain and keep a copy of insurance if FLC or H-2ALC is authorized to transport.
- Obtain and keep copy of the terms and conditions of their work commitment written in the worker's preferred language, to include:
 - place of work (with specifics, such as the name and address of the Company or the association),
 - pay rates (including piece rates) to be paid,
 - crops and kinds of activities for which the worker may be assigned,
 - period of work commitment,
 - transportation, housing, and any other worker benefits to be provided, if any, and any costs to be charged for each, and
 - whether state workers' compensation or state unemployment insurance is provided
- Ensure that the pay of all workers provided by the FLC/H-2ALC meet, at a minimum, national and state minimum wage requirements or adverse effect wage if H2A workers by either paying workers directly rather than through FLC/H-2ALC or ensure the FLC/H-2ALC provides wage statements to workers as legally required and grower obtains and keeps copies.
- Ensure that all workers provided by the FLC/H-2ALC are provided with individual written wage statements that remain in their possession for each pay period that include:
 - Worker's full name,
 - Worker's address (seasonal or permanent),
 - Worker's social security number (last 4-digits is acceptable),
 - Employer's name,
 - Employer's address,
 - Employer's identification number (entire number),

- Total pay period earnings,
- Number of hours worked,
- Basis on which wages are paid (piece rate if paid on a piecework basis),
- Number piecework units earned, if applicable,
- Specific sums withheld, and the purpose of each sum withheld,
- Net pay

NOTE: If subject to MSPA, H2A or FSLA, a more detailed statement may be required.

CRITICAL STANDARDS FOR US CERTIFICATION

- The grower must obtain the written consent of any youth worker's (under 18) parent or legal guardian prior to work commitment commencing provided by the FLC/H-2ALC.
- Ensure all workers provided by the FLC/H-2ALC are 16 years of age or older.
- Verify workers provided by the FLC/H-2ALC are 16 years of age or older by reviewing the worker's I-9 form.

CRITICAL STANDARDS FOR INTERNATIONAL CERTIFICATION

- Ensure all workers provided by the FLC/H-2ALC are 18 years of age or older.
- Verify workers by the FLC/H-2ALC are 18 years of age or older by reviewing the worker's I-9 form.
- Ensure no worker under 18 provided by the FLC/H-2ALC is assigned other hazardous tasks (Appendix 1 – List A).

ADDITIONAL STANDARDS

High

- If minors (under 18), provided by the FLC/H-2ALC, work on the farm records that include, at minimum must be maintained: Name in full, place where the minor lives while employed, permanent address, date of birth.

FORCED LABOR AND HUMAN TRAFFICKING

Standards in this section do not apply to immediate family farm labor. If your operation hires ANY non-immediate family farm labor these standards will apply to those non-immediate family workers.

CRITICAL STANDARDS FOR ALL CERTIFICATIONS

- Workers shall be allowed to terminate their work commitment at any time, without the threat of intimidation, coercion, blacklisting, or any other type of discrimination or retaliation.
- Growers are prohibited from employing compulsory or prison labor.
- All work must be voluntary and shall not be carried out under threat or duress. Growers must not recruit, transport, or receive workers using threats, force, coercion, abduction, fraud, or deceit or abuse of their power or the vulnerability of workers.
- Workers shall not be charged any fees for their recruitment or transport to their place of work, by the grower.

- Growers are prohibited from retaining workers' personal identity documents, visas, money, valuables, paychecks, debit or credit cards, or return tickets. Growers may provide, upon request, workers with safe place to store these items, but these items must be accessible to the workers upon request.
- There shall be no restrictions on workers' freedom of movement, and workers shall be permitted to enter and exit their place of work.

WORKER RIGHTS AND RESPONSIBILITIES AND WORKER CONCERN PROCESS

Standards in this section do not apply to immediate family farm labor. If your operation hires ANY non-immediate family farm labor these standards will apply to those non-immediate family workers.

CRITICAL STANDARDS FOR ALL CERTIFICATIONS

- A Worker Rights and Responsibilities poster must be posted in their native language where workers can access and read it on or near the job site.
- The most current GAPC Worker Concern Helpline poster or other approved third-party worker concern phone number must be posted in their native language where workers can access and read it on or near the job site.
- Grower must implement a worker concern process. This is a documented program that is discussed AND given to or posted for all workers. The policy must be written in a language common to the workers and set forth the terms of the available worker concern process to include the following (growers may use the posters and template provided by GAPC):
 - The Grower is committed to providing a safe working environment for all workers and satisfy all legal rights of workers while they are on their farm.
 - A method is available for workers to notify the Grower, orally and in writing, of any concern related to the terms or conditions of work.
 - The Grower will investigate concerns brought forth by workers and provide notice to the workers, if known, of how the concern will be or was addressed. At the request of the workers, an informal meeting between the grower and workers will be held to address the concern.
 - If a worker raises a concern with grower and is not satisfied with the resolution or handling of the issue, they are encouraged to call the GAPCs' Worker Concern Helpline or to an alternative approved third-party helpline to voice and address the concern.
 - The Grower, any of his/her employees or agents will retaliate against workers for using the worker concern process.

Other approved third-party worker concern helplines or processes:

- If you use North Carolina Growers Association (NCGA) to source H-2A workers for your farm you may use the NCGA grievance mechanism to fulfill the requirement of a documented worker concern process and you do not have to post the GAPC Worker Concern Helpline poster. You must provide the following:
 - Documentation that describes the procedures and policies used;
 - Documentation on how this is shared with your workers (found in the signed Acknowledgement of Receipt from NCGA);
 - Visual evidence of it being displayed or shared on a daily basis with the workers (i.e.

poster, sign, wallet card, etc.

FREEDOM OF ASSOCIATION

Standards in this section do not apply to immediate family farm labor. If your operation hires ANY non-immediate family farm labor these standards will apply to those non-immediate family workers.

CRITICAL STANDARDS FOR ALL CERTIFICATIONS

- Respect the legal rights of workers to, or not to, associate, organize and bargain collectively.
- Do not interfere in union activities.
- Do not discriminate nor retaliate against workers for such activities.

HARRASSMENT AND DISCRIMINATION

Standards in this section do not apply to immediate family farm labor. If your operation hires ANY non-immediate family farm labor these standards will apply to those non-immediate family workers.

CRITICAL STANDARDS FOR ALL CERTIFICATIONS

- All workers must be treated with dignity and respect and not be threatened with or subjected to verbal, physical, sexual or mental harassment or abuse, coercion, or corporal punishment during work commitment or recruitment.
- Workers must not be subject to discrimination based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, veteran status, or marital status.

ADDITIONAL STANDARDS

High

- Have a documented anti-discrimination policy.

SANITATION, HOUSING AND TRANSPORTATION

Standards in this section apply to ALL farming operations including those that only have immediate family farm labor, if applicable.

CRITICAL STANDARDS FOR ALL CERTIFICATIONS

- Growers must provide workers easy access to the following as required:
 - Cool, potable water available during work hours
 - Clean and sanitary bathroom facilities during work hours
 - Hand washing facilities with soap at close proximity to bathrooms
- Grower operations with eleven (11) or more workers, employed during the past twelve months, at any one time, engaged in hand-labor operations must provide clean and sanitary bathroom facilities during work hours and hand washing facilities with soap at close proximity within a quarter-mile walking distance from workers' place of work in the field. Toilet and handwashing facilities are not required within a

quarter mile for workers who perform field work for a period of three (3) hours or less (including transportation time to and from the field) during the day.

- Growers must offer workers rest breaks during the day, including lunch, without compromising their ability to earn wages.
- If the grower provides housing directly to seasonal or migrant workers, the grower must:
 - Ensure that the facility complies with all federal and state safety and health standards, including up-to-date certification from DOL or other appropriate governmental agencies²⁵
 - Post or present to each worker, in their native language a statement of the terms and conditions of occupancy which must include:²⁶
 - Name and address and contact information of the individual in charge of the housing,
 - Emergency contact information,
 - Physical address and mailing address of the housing facility,
 - Who may live at the housing facility,
 - Charges to be made for housing,
 - Meals to be provided and any associated cost for them,
 - Charges for utilities, and
 - Any other charges or conditions of occupancy
- If transportation is provided, growers must ensure that vehicles meet legally required safety standards and that drivers are properly insured and licensed. Vehicles must be inspected when required by law, and person supplying the transportation must maintain inspection records.²⁷

Additional Standards

High

- If the grower provides housing directly to seasonal or migrant workers, the grower must:
 - Inspect housing prior to occupancy and at mid-season, using the OSHA Housing Safety and Health Checklist provided in Agricultural Labor Management Guide.²⁸

FARM SAFETY

Standards in this section apply to ALL farming operations including those that only have immediate family farm labor.

CRITICAL STANDARDS FOR ALL CERTIFICATIONS

Growers should provide a safe and healthy workplace by complying with the standards below and all applicable safety, health and environmental laws and regulations. Growers must:

- Maintain records of all work-related accidents and illnesses serious enough to interfere with the workers' ability to perform their job and/or otherwise required by occupational safety and health laws. Records of all work-related accidents must be maintained at the worksite for at least five years.

²⁵ See Resource on page 29 in Appendix 2.

²⁶ See Resource on page 29 in Appendix 2.

²⁷ See Resource on page 29 in Appendix 2.

²⁸ See Resource on page 29 in Appendix 2.

Note: GAPC Requires previous and current year information. Please review the questions for more details.

- From February through April, growers must post a summary of the injuries and illnesses recorded the previous year (OSHA Form 300 A).
- Review accident records periodically for guidance on avoiding future injuries.
- Follow Occupational Safety and Health Administration (OSHA) guidelines with respect to addressing GTS and heat stress risks.
- Take precautions to limit worker exposure to wet tobacco and ensure adequate measures are in place to prevent GTS
- Identify risks on the farm such as those involved in operating machinery/equipment, adverse weather conditions, agrochemical applications, etc. and train workers on how to avoid and protect themselves from such risks.
- Follow the legal requirements that restrict workers from entering an area where agrochemicals have been used, and as legally required, post signs designating re-entry times for specific fields after agrochemical application.
- Have a dedicated emergency contact person for all workers.
- Provide access to Emergency Medical Services (EMS).
- Provide workers with an emergency plan for medical emergencies, fires, or weather events.

ADDITIONAL STANDARDS

High

- Have a staff member (or grower) certified in First Aid/CPR/AED training.²⁹

TRAINING

Standards in this section apply to ALL farming operations including those that only have immediate family farm labor. Training is to be done for all workers (family and non-family).

CRITICAL STANDARDS FOR ALL CERTIFICATIONS

- Grower documents training to farm workers on the hazards and risks associated with agrochemicals, safe working practices, emergency response and health surveillance including:
 - Heat Stress
 - Farm Safety, including Farm Equipment Safety
 - Carbon Monoxide Poisoning Prevention (if applicable)
 - Pesticide Safety and Personal Protective Equipment (PPE)
 - Green Tobacco Sickness (GTS)
 - Emergency response procedures
 - Recognition of REI
 - Storage, handling, application, and disposal of CPAs
 - NTRM Prevention

²⁹ See Resource on page 30 in Appendix 2.

- Grower follows all requirements of state and national regulations and training requirements related to worker protection and agrochemical use.

ADDITIONAL STANDARDS

High

- Grower documents training to farm workers on:
 - Proper baling and market separation of tobacco
 - AIR & FIRE ONLY: Grade separation

SAFETY EQUIPMENT

Standards in this section apply to ALL farming operations including those that only have immediate family farm labor. Training is to be done for all workers (family and non-family). Personal protective equipment (PPE) will be evaluated based on tasks performed by workers. PPE should be available to all those workers performing tasks that require PPE.

CRITICAL STANDARDS FOR ALL CERTIFICATIONS

- Use label-required PPE by applicators/handlers/early entry workers.³⁰
- Provide gloves and water-resistant clothing for workers working in wet tobacco.
- Provide chemical resistant gloves for anyone handling or applying agrochemicals.
- Provide chemical resistant aprons for anyone mixing or loading agrochemicals.
- Provide chemical resistant footwear for anyone mixing or loading agrochemicals.
- Provide safety glasses for workers applying or handling agrochemicals or performing jobs which can create flying objects that damage eyes such as grinding, sawing, driving nails, etc.
- Provide hearing protection equipment for workers operating machinery or power tools.
- Provide dust masks for workers handling cured tobacco or operating machinery or power tools under dusty conditions.

ADDITIONAL STANDARDS

High

A grower is required to:

- Have adequately maintained farm vehicles, machinery and tools with the originally installed guards, shields or other protections as per manual/guidance provided by manufacturer or dealer of equipment.
- Have adequate First-aid equipment for the number of their workers for the grower's tobacco production operation.
Have ready-to use fire extinguishers available within two hundred feet of curing barns when workers are present.

³⁰ See Resources on page 27 in Appendix 2.