

Overview As of August 3, 2022, OSHA launched a five year Regional Emphasis Program (REP) targeting warehousing, storage, and distribution yard operations in Region 3, which covers **Pennsylvania, Delaware, Maryland, Virginia, West Virginia, and the District of Columbia.**

Use the following Internet link to view the REP:

<https://www.osha.gov/sites/default/files/enforcement/directives/2022-01-cpl-04.pdf>

The reason for issuing the REP, according to OSHA, is a total workplace injury and illness case rate (Total Case Rate) that is significantly higher compared to the average for covered industries.

What is an OSHA Regional Emphasis Program? According to OSHA, Regional Emphasis Programs or Local Emphasis Programs *are enforcement strategies designed and implemented at the regional OSHA office and/or area office levels. These programs are intended to address hazards or industries that pose a particular risk to workers in the office's jurisdiction.*

OSHA also has National Emphasis Programs (NEPs) *that create a nationwide enforcement mechanism for OSHA to proactively inspect workplaces with particular hazards or high hazard industries.* The most recent NEP, enacted in April 2022, is for *Outdoor and Indoor Heat Hazards.*

Currently there is no NEP for warehousing, however eight out of the ten OSHA Regions, have emphasis programs for warehousing or powered industrial trucks:

- **Warehousing**—Region 2 (NJ, NY, PR, VI); Region 3; and Region 9 (AZ, CA, HI, NV).
- **Powered Industrial Trucks**—Region 1 (CT, ME, MA, NH, RI, VT); Region 4 (AL, FL, GA, KY, MS, NC, SC, TN); Region 5* (IL, IN, MI, MN, OH, WI); Region 7 (IA, KS, MO, NE); and Region 10 (AK, ID, OR, WA).

* Region 5 Emphasis Program is for powered industrial vehicles, which includes powered industrial trucks.

Focus of the Region 3 Regional Emphasis Program As stated by OSHA, the REP *is intended to reduce injury/illness rates in the warehousing industry by conducting comprehensive inspections to address hazards that may include those associated with:*

- *Powered industrial trucks*
- *Lockout tagout*
- *Life safety*
- *Means of egress*
- *Fire suppression*

Region 3 Regional Emphasis Program—Covered Industries by Industrial Classification (NAICS)

- Manufacturing: Bottled and Canned Soft Drinks and Water – 312111 and 312112
- Manufacturing: Fluid Milk Manufacturing - 311511
- Transportation: Refrigerated Warehousing and Storage – 493120
- Transportation: General Warehousing and Storage – 493110
- Retail Trade: Groceries – 445110
- Wholesale Trade: General Line Grocery - 424410
- Wholesale Trade: Meat and Meat Products – 424470
- Wholesale Trade: Groceries and Related Products – 424490
- Wholesale Trade: Beer & Ale – 424810

When will Inspections Begin? Inspections can begin in early November 2022 (three months from August 3, 2022, effective date of the REP).

What to Expect OSHA will be conducting comprehensive inspections of workplaces that fall within the target NAICS via random selection (Programmed Inspections) or in response to reports of imminent dangers, fatalities/catastrophes, complaints, or referrals (Unprogrammed Inspections).

What is a Comprehensive Inspection? According to OSHA *a comprehensive inspection is a substantially complete and thorough inspection of all potentially hazardous areas of the establishment. An inspection can be deemed comprehensive even though, as a result of professional judgment, not all potentially hazardous conditions or practices within those areas are inspected.*

Warehousing Operations—Areas of Concern According to OSHA, *operation of powered industrial trucks can lead to serious workplace injuries and/or death. Each year, tens of thousands of forklift-related injuries occur in U.S. workplaces.*

OSHA, in the REP Directive, lists the below hazards that cause or contribute to worker fatalities and injuries in warehousing operations

- *Common injuries are found to involve employees struck by lift trucks and falling while standing or working from elevated pallets and tines.*
- *Employees have also been injured when lift trucks are driven off loading docks or when the lift falls between a dock and an un-chocked trailer.*
- *Fatalities have occurred as a result of an under-ride hazard when a horizontal rack beam (crossbar) or similar obstruction enters the operator's compartment.*
- *Employee deaths and injuries have also occurred when performing maintenance activities on powered industrial trucks and conveyor equipment without utilizing lockout tagout procedures.*

OSHA also includes in the Directive *that many employee injuries and deaths can be attributed to lack of procedures, lack of or inadequate training, and lack of safety-rule enforcement*

Prepare for an OSHA Inspection The scope of inspections pertaining to the Warehousing Operations REP cover several areas. Employers should be actively reviewing, evaluating and updating health and safety programs pertaining to the following:

- *Powered industrial trucks*
- *Lockout tagout*
- *Life safety*
- *Means of egress*
- *Fire suppression*
- *Injury & Illness Recordkeeping (300 Log)*

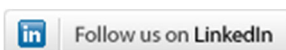
Have a formal plan to handle the onsite portion of the inspection and regularly review and/or practice the plan with staff members. Additionally, employers may want to consider conducting regular “mock” OSHA audits with staff and qualified third party safety professionals.

Assistance Please contact the Lyons Risk Control Services Department for assistance with OSHA compliance and/or any other safety or risk control service need.

Please Note: The information and suggestions presented by Lyons Companies in this Safety & Risk TIP are for consideration in your loss prevention efforts. Lyons Companies does not warrant, via this Safety & Risk Control TIP that all your hazards or exposures are adequately controlled or that property, operations, workplaces, machinery or equipment are safe or in compliance with any law, rule, or regulation. You are encouraged to alter them to fit the specific hazards of your business and to have your legal counsel review all of your plans and company policies.



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