

**OREGON OCCUPATIONAL SAFETY AND HEALTH DIVISION
DEPARTMENT OF CONSUMER AND BUSINESS SERVICES**

PROGRAM DIRECTIVE

Program Directive: A-305

Issued: December 29, 2023

Subject: National Emphasis Program (NEP): Warehousing and Distribution Center Operations

- References:**
1. [Division 1, General Administration](#)
 2. [Division 2, Subdivision D, Walking-Working Surfaces](#)
 3. [Division 2, Subdivision E, Means of Egress](#)
 4. [Division 2, Subdivision J, General Environmental Controls](#)
 5. [Division 2, Subdivision L, Fire Protection](#)
 6. [Division 2, Subdivision N, Material Handling and Storage](#)
 7. [Oregon OSHA Field Inspection Reference Manual \(FIRM\)](#)
 8. [Program Directive A-219 \(Inspection Criteria: Complaint Policies and Procedures\)](#)
 9. [Program Directive A-299 \(Local Emphasis Program \(LEP\): Preventing Heat-Related Illness and guidance on Heat Illness Prevention rules 437-002-0156 and 437-004-1131\)](#)
 10. [U.S. Department of Labor, Occupational Safety and Health Administration, CPL 03-00-026, National Emphasis Program on Warehousing and Distribution Center Operations](#)
 11. [Division 1, OAR 437-001-0057, Inspection Scheduling, Oregon OSHA Safety Inspections for Fixed Places of Employment By NAICS](#)
 12. Oregon OSHA Strategic Plan

Purpose:

This instruction describes policies and procedures when inspecting warehousing and distribution center operations, parcel delivery/courier services, and certain high injury rate retail establishments. All inspections under this National Emphasis Program (NEP) are **comprehensive safety inspections**, and will focus on workplace hazards common to the above industries including, but not limited to, powered industrial vehicle operations, material handling/storage, walking-working surfaces, means of egress, heat illness prevention, ergonomics, and fire protection.

Inspections under this NEP will not include postal or package transportation/delivery to residences and businesses.

Background:

Warehousing and distribution center operations and parcel delivery/courier services warehousing and distribution center operations pose a variety of serious safety and health hazards. These include, but are not limited to, struck-by; caught-in-between; slips, trips, and fall hazards; blocked aisles; means of egress; powered industrial vehicles and other material handling equipment; heat hazards; and ergonomic hazards. Incidents resulting from the above-mentioned hazards may result in serious physical harm or death.

Nationally, warehousing and distribution centers have experienced growth within the past ten years. From January 2011 to December 2021, the warehousing and distribution centers industry experienced a surge in employment, increasing respectively from 668,900 employed to a total 1,713,900 employed (seasonally adjusted). At the same time the warehousing and distribution center industry has experienced high occupational injuries and illness rates. From 2017 through 2021, the five-year national average incidence rate of nonfatal occupational injuries and illnesses and the average Days Away Restricted or Transferred (DART) rate in establishments associated with warehousing and distribution center operations, mail processing and distribution centers, couriers/express delivery services, and local messengers and local delivery industries, were significantly higher than the baseline private general industry rates. The same five-year national averages for total recordable case rates, and total DART rates for industries covered under this NEP are provided in Table 1 below. The data illustrates that workers in warehousing and distribution centers, couriers and express delivery services, and local messengers and local delivery industries suffer higher nonfatal injury and illness rates than the average rate in all private industries nationwide.

Table 1. 2017-2021 five-year average incidence rates of nonfatal occupational injuries and injuries and illnesses by industry and case types.

| Industry | NAICS Code | Total Recordable Cases Rates | Total DART Rates |
|--|------------|------------------------------|------------------|
| All Private Industry | ----- | 2.76 | 1.6 |
| Couriers and Express Delivery Services | 492110 | 8.14 | 6.3 |
| Local Messengers and Local Delivery | 492210 | 3.9 | 2.6 |
| General Warehousing & Storage | 493110 | 5.18 | 4.06 |
| Refrigerated Warehousing and Storage | 493120 | 5.16 | 4.06 |
| Farm Product Warehousing and Storage | 493130 | 3.08** | 2.0** |
| Other Warehousing and Storage | 493190 | 2.86 | 2.2 |

* Figures based on Bureau of Labor Statistics and Injury Tracking Application Data (ITA).

** 2017-2020 four-year average rates based on Bureau of Labor Statistics.

Table 2. NAICS codes for Warehousing and Distribution Center Operations, and Parcel Delivery/Courier Services covered under this NEP.

| NAICS Code | Establishments |
|------------|--|
| 492110 | Couriers and Express Delivery Services |
| 492210 | Local Messengers and Local Delivery |
| 493110 | General Warehousing and Storage |
| 493120 | Refrigerated Warehousing and Storage |
| 493130 | Farm Product Warehousing and Storage |
| 493190 | Other Warehousing and Storage |

High Injury Rate Retail Establishments – Many retail establishments have the same or similar hazards as warehousing and distribution facilities, particularly in loading and storage areas. This NEP provides procedures for conducting comprehensive safety inspections of certain retail establishments with the highest rates of injuries and illnesses resulting in days away, restricted duty, or job transfer. The most recent employer-reported data (from CY 2021) submitted pursuant to OAR 437-001-

0700(24) [and 29 CFR 1904.41] through federal OSHA’s Injury Tracking Application (ITA) indicates that the highest-risk retail establishments are in following NAICS codes:

- Home centers - 444110;
- Hardware stores - 444130;
- Other building material dealers - 444190;
- Supermarkets and other grocery (except convenience) stores - 445110; and
- Warehouse clubs and supercenters - 452311.

High-risk retail establishments in these NAICS codes are covered by this NEP. Inspections in these establishments under this NEP will be comprehensive and will focus on workplace hazards common to those industries including powered industrial vehicles operations, material handling/storage, walking-working surfaces, means of egress, heat illness prevention, ergonomics, and fire protection. Any health related hazards identified (e.g., carbon monoxide exposure, noise, chemical exposures, chemical spills, etc.) should be referred to health enforcement.

Table 3. High Injury Rate Retail Establishments covered under this NEP.

| NAICS Code | High Injury Rate Retail Establishments |
|------------|--|
| 444110 | Home Centers |
| 444130 | Hardware Stores |
| 444190 | Other Building Material Dealers |
| 445110 | Supermarkets and other grocery stores |
| 452311 | Warehouse Clubs and Supercenters |

**Scheduling/
Site Selection:**

This National Emphasis Program (NEP) covers warehousing and distribution centers, couriers and express delivery services, and local messengers and local delivery industries, as well as high injury rate retail establishments, discussed in paragraphs A and B below. Site selection under this NEP will use the safety scheduling list for fixed places of employment provided to each field office, that are compiled using an electronic scheduling system process, per Division 1, OAR 437-001-0057 (Scheduling Inspections). This scheduling list ranks establishments listed in tables 4 and 5 below as high hazard industries and prioritizes them for inspection. Field offices will generally inspect establishments in the tier and rank order as provided on each list to ensure neutrality. However, inspecting establishments out of order is permissible if furthers Oregon OSHA's goal of efficient allocation of inspection resources.

A. Warehouses and Distribution Centers. This NEP targets warehousing and distribution center operations, parcel delivery/courier services, and certain high injury rate retail establishments. Inspections conducted under this NEP will focus on workplace hazards common to those industries including powered industrial vehicles operations, material handling/storage, walking-working surfaces, means of egress, heat illness prevention, ergonomics, and fire protection. Any health related hazards identified (e.g., carbon monoxide exposure, noise, chemical exposures, chemical spills, etc.) should be referred to health enforcement.

Table 4. Safety Inspection Scheduling Rank and Tier by NAICS Code

| NAICS Code | Establishments | Rank/Tier |
|-------------------|--|------------------|
| 492110 | Couriers and Express Delivery Services | 2/A |
| 492210 | Local Messengers and Local Delivery | 4/A |
| 493110 | General Warehousing and Storage | 16/B |
| 493120 | Refrigerated Warehousing and Storage | 16/B |
| 493130 | Farm Product Warehousing and Storage | 16/B |
| 493190 | Other Warehousing and Storage | 16/B |

B. High Injury Rate Retail Establishments. This NEP also targets high injury rate retail establishments in the NAICS codes identified in Table 5 below every calendar year for each field office geographical location, that are compiled using an electronic scheduling system process, per Division 1, OAR 437-001-0057 (Scheduling Inspections). Inspections of high injury rate retail establishments conducted under this NEP will focus on powered industrial vehicles operations, material handling/storage, walking-working surfaces, means of egress, heat illness prevention, ergonomics, and fire protection. Any health related hazards identified (e.g., carbon monoxide exposure, noise, chemical exposures, chemical spills, etc.) should be referred to health enforcement. Inspections in these establishments under this NEP shall cover the loading and storage areas.

Table 5. Safety Inspection Scheduling Rank and Tier by NAICS Code

| NAICS Code | High Injury Rate Retail Establishments | Rank/Tier |
|-------------------|---|-----------|
| 444110 | Home Centers | 77/G |
| 444130 | Hardware Stores | 77/G |
| 444190 | Other Building Material Dealers | 77/G |
| 445110 | Supermarkets and other grocery stores | 107/G |
| 452311/ 452910 | Warehouse Clubs and Supercenters/ Other General Merchandise Stores | 87/G |

- C. Scheduling List Deletions. Oregon OSHA must:
- Delete any establishments known to be out of business, documenting the basis for such determinations.
 - Verify that any establishment that was subject to an inspection related to the hazards addressed by this NEP within the previous three years is deleted from the inspection list and not inspected under this NEP.
- D. Unprogrammed Inspections. Inspections based upon fatalities/catastrophes, complaints, or referrals related to establishments in the NAICS codes covered under this NEP shall be expanded to address the workplace hazards targeted by this NEP, including powered industrial vehicles operations, material handling/storage, walking-working surfaces, means of egress, heat illness prevention, ergonomics, and fire protection. In addition to the guidelines provided in this NEP, the inspections must be handled in accordance with FIRM, Chapter 4, [Complaint and Referral Inspections](#), and Chapter 5, [Imminent Danger, Fatality, Catastrophe, and Emergency Response](#).
- E. Follow-up Inspections. Follow-up inspections are to be conducted in accordance with FIRM, Chapter 9, [Post-citation Procedures, Section V., Abatement](#), based on available resources.

Procedures:

This National Emphasis Program (NEP) covers both programmed and unprogrammed safety inspections, and all inspections will be conducted in accordance with provisions of the FIRM, Chapter 3, [Conducting Inspections](#). Complaints and referrals pertaining to establishments covered under this NEP should be processed in accordance with the procedures outlined in FIRM, Chapter 4, [Complaint and Referral Inspections](#).

Inspections conducted under this NEP may be combined with other programmed and unprogrammed inspections.

- A. Opening Conference. The CSHO will verify the NAICS code of the site, and the number of employees employed by the employer. After confirming that the workplace is subject to inspection under this NEP (see paragraphs 1-3 below). In addition, OSHA 300 logs, 300A summaries, and OSHA 801 incident reports, for the current and previous three calendar years will be reviewed during the opening conference to identify recorded injuries and illnesses associated with the focused hazards covered by this NEP.

After verifying the NAICS code of the establishment, the CSHO must conduct an inspection under this NEP unless the site NAICS code is not listed in Table 2 or Table 3 of this NEP.

ITA Non-responders. When conducting an inspection of a non-responder employer OAR 437-001-0700(24), *Electronic submission of injury and illness records to OSHA*, CSHOs should consult their manager for citing the employer's failure to submit such records.

- B. Training. Because of the varied nature of some of these inspections and the hazards that present themselves, CSHOs who conduct inspections under this NEP must have training and/or knowledge to address the related hazards.
- C. Heat Screening. Occupational heat exposure must be assessed during review of injury and illness records, during worker interviews, and during the establishment walkthrough. When exposure to heat-related hazards are occurring, the inspection shall be in accordance with the Oregon OSHA's Local Emphasis Program (LEP), [Program Directive A-299: Preventing Heat-Related Illness and guidance on Heat Illness Prevention rules 437-002-0156 and 437-004-1131.](#)
- D. Ergonomic Screening. Worker exposure to ergonomic hazards must be assessed during review of the employer's injury and illness logs, during worker interviews, and during the establishment walkthrough.

Outreach:

Oregon OSHA will engage in outreach for employers in the Table 2 and 3 to provide assistance and guidance on the hazards associated with warehousing and distribution and high injury retail establishments. Some methods of outreach may include a targeted consultation outreach campaign, news releases, social media posts, coordination with employers, professional associations, and local unions that may include meetings,

training, education, speeches, or other activities designed to involve labor and management in the identification and elimination of hazards associated with warehousing and high injury retail establishments. Oregon OSHA has discretion to disseminate outreach materials to stakeholders, which may include employees, employers, professional associations, and local unions.

Additional resources and reference materials, including to related topics, are available on OSHA's designated *Warehousing* webpage, located at <https://www.osha.gov/warehousing>.

Training:

Oregon OSHA will ensure that all CSHOs who conduct inspection covered under this National Emphasis Program (NEP), and other affected personnel, receive training on this NEP and all applicable standards and other directives associated with this NEP. Continued training will be provided, as needed.

**OSHA-1
Coding:**

For OTIS coding purposes:

1. The Inspection Type for those inspections conducted under this National Emphasis Program (NEP) must be marked as Program Planned.
2. The Inspection Classification for these emphasis inspections shall be marked as National Emphasis Program – “WAREHOUSE”. Consultations conducted under this emphasis shall be marked as “National Emphasis Program – “WAREHOUSE”.
3. The Inspection Type for related inspections which are conducted as a result of this NEP, but do not fall under the scope of this program, shall be marked as Programmed Related.
4. Inspections which are conducted under this NEP shall be considered a comprehensive inspection.

Effective

Date:

This directive is effective immediately and will remain in effect until canceled or superseded.

History: Issued 12/29/2023