

Welcome to Today's Webinar

OSHA's Temporary Worker Initiative Bulletin Series: Warehousing and Ergonomics

Thursday, March 7, 2024, 2 p.m. Eastern time



Please note that the audio will be streamed through your computer—there is no dial-in number. Please make sure to have your computer speakers turned on or your headphones handy.



American Staffing Association





ASA Certification Continuing Education

Today's webinar qualifies for 1.0 CE hour

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- **On-demand viewers:** Submit this earned CE using the online submission form at americanstaffing.net.
- This program is valid for **PDCs** for the SHRM-CP® or SHRM-SCP®.

Activity ID: 24-U3X5A



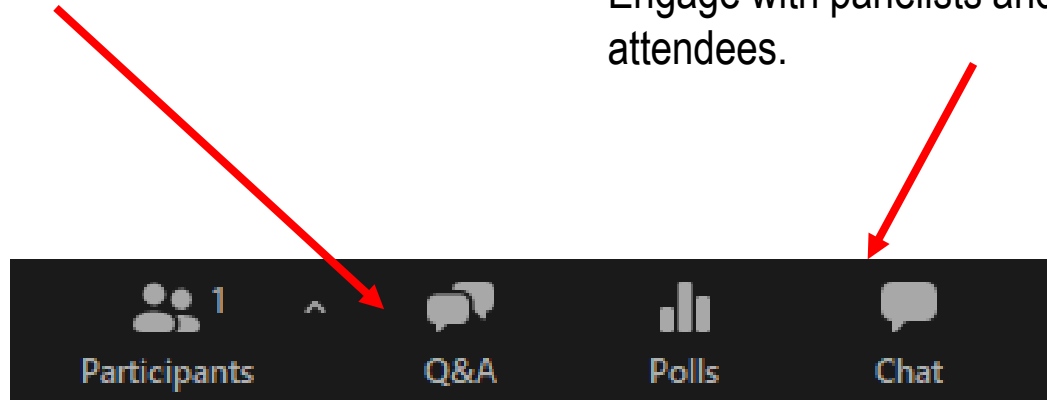
Ask a Question, Engage With Other Attendees

Q&A

Type your questions for the panel into the Q&A box

Chat

Start a conversation—say hello. Engage with panelists and other attendees.



Our Presenters Today



Brittany Sakata
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U.S. Department of Labor, OSHA



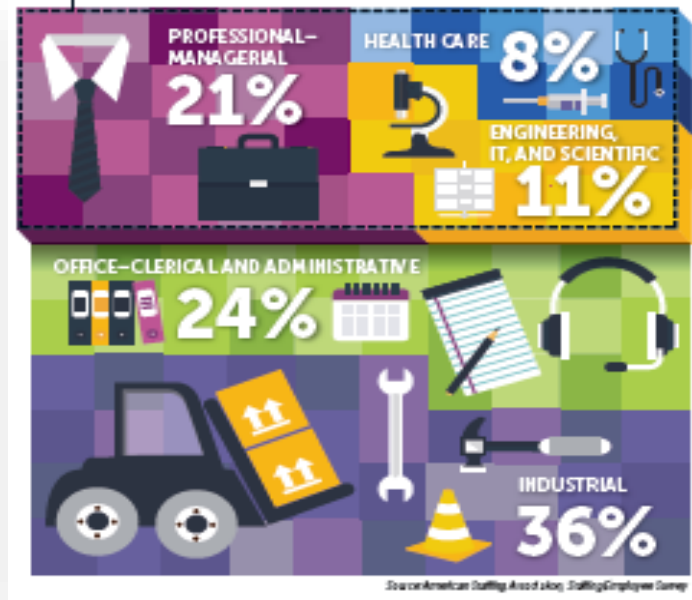
Courtney Frost
Occupational Safety and Health Specialist
U.S. Department of Labor, OSHA

Staffing Industry Impact

- Nearly **3 million** temporary and contract employees work for America's staffing companies **during an average week**
- **During the course of a typical year**, America's staffing companies **hire 14.5 million temporary and contract employees**
- 25,000 staffing and recruiting companies, which altogether operate ~ 49,000 offices across the US

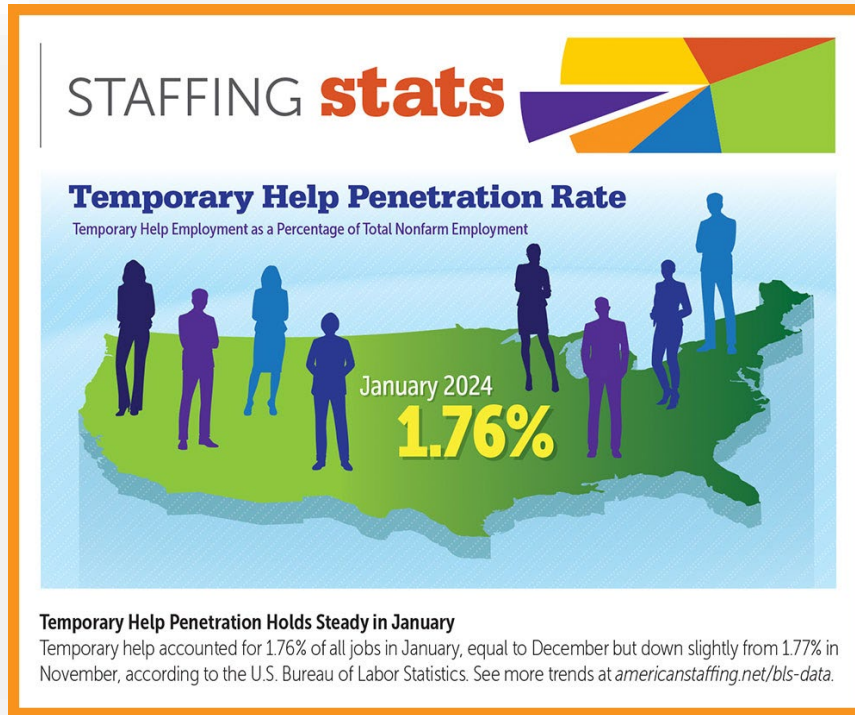
Staffing Industry Impact

- 40% of staffing employees work in higher-skilled occupations.



Sources: American Staffing Association; Staffing Industry Analysts Inc.; U.S. Department of Commerce

Staffing Industry Impact



As the voice of the staffing, recruiting, and workforce solutions industry, ASA works to advance the interests of the industry through advocacy, research, education, and the promotion of high standards of legal, ethical, and professional practices.

Key Legal and Legislative Topics

- Workplace Safety
- Nurse Staffing Regulation
- Employer Role of Staffing Agencies and Clients
- Immigration Reform
- Mandated Leave Benefits
- Gig Economy
- Wage and Hour
- Sales Taxes
- Unemployment Insurance

Temporary and contract staffing is one of America's largest service industries, employing more than 16 million people each year and playing a major role in the nation's job growth. The association's legal and legislative activities focus on promoting the ability of staffing agencies to create jobs and serve their clients.

Like all employers, staffing agencies are subject to many labor and employment laws that protect workers, including equal employment opportunity, workplace safety, wage and hour worker: compensation, and unemployment insurance. ASA promotes rigorous compliance with those laws and has developed certification and other education programs to help staffing professionals understand their obligations

Legal Protections for Temporary Workers

- EEOC Enforcement Guidance on the Application of EEO Laws to Contingent Workers Placed by Temporary Employment Agencies
- EEOC Q&A: Enforcement Guidance: Application of the ADA to Contingent Workers Placed by Temporary Employment Agencies



U.S. Equal Employment Opportunity Commission

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Questions and Answers: Enforcement Guidance: Application of the ADA to Contingent Workers Placed by Temporary Agencies and Other Staffing Firms

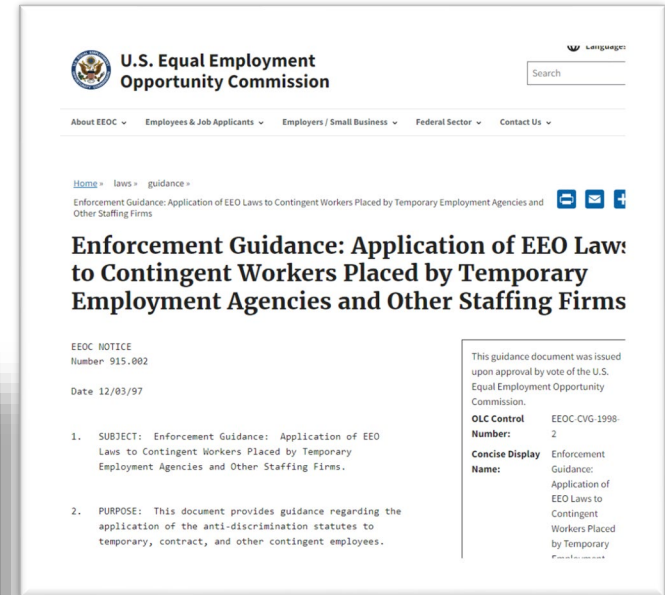
Questions and Answers: Enforcement Guidance: Application of the ADA to Contingent Workers Placed by Temporary Agencies and Other Staffing Firms

Introduction

Why did the EEOC issue this Guidance?

- Contingent workers placed by staffing firms, including for example, temporary, contract, and leased workers, represent a growing segment of the labor force.

Notice Concerning The Americans With Disabilities Act



U.S. Equal Employment Opportunity Commission

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Enforcement Guidance: Application of EEO Laws to Contingent Workers Placed by Temporary Employment Agencies and Other Staffing Firms

Enforcement Guidance: Application of EEO Laws to Contingent Workers Placed by Temporary Employment Agencies and Other Staffing Firms

EEOC NOTICE
Number: 915.002
Date: 12/03/97

- SUBJECT:** Enforcement Guidance: Application of EEO Laws to Contingent Workers Placed by Temporary Employment Agencies and Other Staffing Firms.
- PURPOSE:** This document provides guidance regarding the application of the anti-discrimination statutes to temporary, contract, and other contingent employees.


This guidance document was issued upon approval by vote of the U.S. Equal Employment Opportunity Commission.

OLC Control Number: EEOC-CVG-1998-2

Concise Display Name: Enforcement Guidance: Application of EEO Laws to Contingent Workers Placed by Temporary

Legal Protections for Temporary Workers

- OSHA: Host employers and staffing companies are **jointly responsible** for protecting the safety and health of temporary workers.
 - Temporary workers must be provided the **same training as internal workers**
 - Host employer is responsible for providing **site- and task-specific safety and health training**, and the staffing company is responsible for providing **general safety and health awareness training**
 - In most cases, host employers must report temporary worker injuries on their **own OSHA 300 logs**



If you work through a staffing agency...

OSHA

You have the same rights as permanent workers. *The right to:*

- a safe workplace free of dangers.
- receive training in clear language that you understand.
- receive safety equipment.
- speak up about safety.
- report work-related injuries without being punished.

OSHA protects all workers in the United States.

Do you have a safety concern?
Were you punished for speaking up about safety or for reporting an injury?

Call OSHA. We can help. It's confidential.

1-800-321-OSHA (6742)
www.osha.gov

U.S. Department of Labor

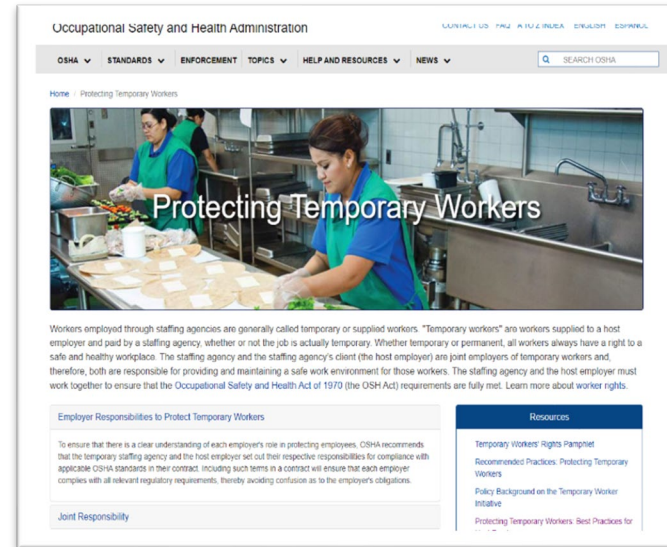
OSHA Occupational Safety and Health Administration

Scan the code to learn more about temporary workers' rights

OSHA 3751-12-2014

OSHA/ASA Formal Alliance

- Temporary Worker Initiative (TWI) launched 2013
 - Employer Responsibilities to Protect Temporary Workers
 - Joint Responsibility
 - Staffing Company/Host Employer Roles
- Alliance originally signed in 2014, renewed in 2016
- Signed Ambassador Agreement in August 2022
- ASA has supported & assisted the TWI with promotion & input from its members' safety experts, webinars, etc.



The screenshot shows the OSHA website page for 'Protecting Temporary Workers'. The page features a navigation menu with links for OSHA, STANDARDS, ENFORCEMENT, TOPICS, HELP AND RESOURCES, and NEWS. A search bar is located in the top right corner. The main content area includes a large image of two workers in a kitchen setting, with the title 'Protecting Temporary Workers' overlaid. Below the image, there is a paragraph of text explaining that temporary workers are generally called temporary or supplied workers and are employed through staffing agencies. The text states that both the staffing agency and the host employer are joint employers and responsible for providing a safe work environment. Below the text, there are three sections: 'Employer Responsibilities to Protect Temporary Workers', 'Joint Responsibility', and 'Resources'. The 'Resources' section includes links to 'Temporary Workers' Rights Pamphlet', 'Recommended Practices: Protecting Temporary Workers', 'Policy Background on the Temporary Worker Initiative', and 'Protecting Temporary Workers: Best Practices for...'

OSHA/ASA Formal Alliance

■ TWI Resources & Bulletins

- Each TWI includes guidance, sample scenarios, regulation links & more
- *Newest* Bulletins on Warehousing Industry Employment & Ergonomics
- Learn more at [osha.gov/temporaryworkers](https://www.osha.gov/temporaryworkers) and americanstaffing.net/safetymatters

Resources

[Temporary Workers' Rights Pamphlet](#)

[Recommended Practices: Protecting Temporary Workers](#)

[Policy Background on the Temporary Worker Initiative](#)

[Protecting Temporary Workers: Best Practices for Host Employers](#)

Temporary Worker Initiative Bulletins:

- [Bloodborne Pathogens](#)
- [Ergonomics for the Prevention of Musculoskeletal Disorders \(Español\)](#)
- [Exposure to Outdoor and Indoor Heat-Related Hazards](#)
- [Hazard Communication](#)
- [Hazardous Energy \(Lockout/Tagout\)](#)
- [Injury and Illness Recordkeeping Requirements](#)
- [Noise Exposure and Hearing Conservation](#)
- [Personal Protective Equipment](#)
- [Powered Industrial Truck Training](#)
- [Respiratory Protection](#)
- [Safety and Health Training](#)
- [Shipyard Employment](#)
- [Warehousing Industry Employment \(Español\)](#)
- [Whistleblower Protection Rights](#)




Additional Temporary Worker Safety Resource

- NIOSH NORA Council- Contingent Workers Workgroup
 - Best Practices Document for Host Employers—*Download today!*



ASA Temporary Worker Safety Resources: americanstaffing.net/safetymatters

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Safety Matters: Keeping Temporary Workers Safe on the Job


ASA is committed to protecting the rights, safety, and well-being of temporary workers —and educating staffing companies, their clients, and temporary workers about temporary worker rights and employer responsibilities under the Occupational Safety and Health Act. Learn more about temporary worker safety and our alliance with OSHA below.

SAVE DISCUSS SHARE [t](#) [f](#) [in](#) [✉](#)

The ASA-OSHA Alliance

ASA and OSHA have joined forces to develop and execute a strategic plan focused on protecting the health and safety of temporary workers in the U.S.

- [Learn more about the alliance at OSHA's website »](#)
- [OSHA's Protecting Temporary Workers page »](#)




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TEMPORARY WORKER SAFETY
OSHA Publishes Holiday Worker Safety Resources

As the nation enters the holiday shopping season, employers must ensure that all workers are trained to recognize and prevent job hazards. [See resources published by OSHA](#), which cover a broad range of work environments.

[Read more »](#)




TEMPORARY WORKER SAFETY
Safety Resources Designed for Staffing Firms

ASA, in partnership with the National Institute for Occupational Safety and Health (NIOSH) and a coalition of safety organizations, has announced the publication of a [new resource document](#) outlining ways host employers can keep temporary workers safe on the job.

Follow ASA on the web



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Staffing Best Practices: Employee Safety

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Promoting and ensuring employee safety and well-being is the responsibility of every staffing firm. Through the establishment and implementation of employee safety best practices, staffing firms foster a workplace culture that increases employer and worker awareness of, commitment to, and involvement in employee safety and well-being.

Staffing firms and employees benefit from fewer workplace hazards and exposures, as well as fewer worker injuries, illnesses, and fatalities. Moreover, worker satisfaction, productivity, collaboration, recruitment, and retention all increase dramatically when employers promote and ensure safe and healthy work environments.

The Employee Safety Best Practices and Operating Information documents pertain to:






- Staffing firms' general operations and management of workplace incidents
- Staffing firms' internal and temporary employees
- Staffing firms' selection of, and interaction with, clients, secondary suppliers, vendor management systems; (VMSs) and managed service providers (MSPs)

These best practices have proven to increase productivity and the quality of the workforce, as well as decreasing turnover and reducing insurance costs. Ultimately, these corporate and field-level policies and procedures can increase profitability.

Download the best practices for firms with these areas of focus:


The information in these best practices should not be relied on as, and is not intended to be, legal advice. Staffing firms requiring legal or other advice regarding the matters discussed in these best practices should consult with experienced legal counsel.

ATTACHMENTS

-  Best Practices and Operating Information–Industrial
PDF 350 KB
-  Best Practices and Operating Information–Nursing
PDF 361 KB
-  Best Practices and Operating Information–Office & Clerical
PDF 397 KB
-  Best Practices and Operating Information–Professional & Managerial
DOCX 72 KB
-  Best Practices and Operating Information–Technical

Best Practices

- [Doing Business with the Federal Government](#)
- [Staffing Best Practices: Employee Safety](#)
- [Best Practices for Reducing Workers' Compensation Costs](#)
- [Nurse Staffing Firm Best Practices](#)
- [VMS and MSP Best Practices](#)



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Washington State's NEW Temporary Worker Safety Law: How to Comply 


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Topics: Compliance & Risk Management, Employment Law, Safety

Webinar:
OSHA's Safety and Health in Shipyards Employment Bulletin 


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0.5 Legal CE | Feb 13, 2020 | Compliance/Legal/Risk Management
Topics: Compliance & Risk Management, Safety, OSHA

Webinar:
Compliance Best Practices in Industrial Staffing, Part 2: Safety and OSHA's Temporary Worker Initiative 


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1.0 Legal CE | Aug 28, 2019 | Compliance/Legal/Risk Management
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1.0 Legal CE | Jun 5, 2019 | OSHA_safety
Topics: OSHA

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Demonstrate Your Commitment to Worker Safety: Be a Trusted Partner and Employer of Choice 

★★★★★ (96)

1.0 Legal CE | Sep 28, 2018 | worker safety, safety, Compliance and Risk Management
Topics: Safety

Webinar:
Safety and Health Regulations in California: Updated Compliance Requirements 

★★★★★ (43)

1.0 Legal CE | Apr 26, 2018 | Compliance and Risk Management, California
Topics: OSHA





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OSHA Temporary Worker Initiative Bulletin Series: Warehousing and Ergonomics

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Office of General Industry and Agricultural Enforcement
National Office Directorate of Enforcement Programs
Occupational Safety and Health Administration

Disclaimer

This information has been developed by the OSHA National Office Directorate of Enforcement Programs, to assist employers, workers, and others improve workplace health and safety. While we attempt to thoroughly address specific topics or hazards, it is not possible to include discussion of everything necessary to ensure a healthy and safe working environment in this presentation. This information is a tool for addressing workplace hazards and is not an exhaustive statement of an employer's legal obligations, which are defined by statute, regulations, and standards. This document does not have the force and effect of law and is not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies. It does not create or diminish legal obligations under the Occupational Safety and Health Act. Finally, OSHA may modify rules and related interpretations in light of new technology, information, or circumstances; to keep apprised of such developments, or to review information on a wide range of occupational safety and health topics, you can visit OSHA's website at www.osha.gov

Protecting Temporary Workers



TWI BULLETIN NO. 14



Temporary Worker Initiative

Warehousing Industry Employment

This is part of a series of guidance documents developed under the Occupational Safety and Health Administration's (OSHA's) Temporary Worker Initiative (TWI). The TWI focuses on compliance with safety and health requirements when **temporary workers** are jointly employed by a **staffing agency** and a **host employer**.

Introduction

The U.S. warehousing market experienced tremendous growth in recent years, driven largely by e-commerce. The rise in demand for consumable goods creates employment opportunities for many workers, including temporary workers. However, depending on many factors, warehouses can be worksites with significant hazards. Temporary workers are entitled to the same protections under the Occupational Safety and Health Act of 1970 (the OSH Act) as all other covered workers. Generally, when a staffing agency supplies temporary workers to a business, the staffing agency and the staffing agency's client (the host employer) are considered joint employers of those temporary workers. As joint employers, both the staffing agency and the host employer are responsible for assessing the temporary workers' working conditions and complying with the law. In these joint employment situations, there are common questions regarding how each employer can fulfill its duty to comply with the OSH Act and other applicable standards. This bulletin addresses what the staffing agency and the host employer can do to ensure that temporary workers in the warehousing and storage industry stay safe.

within each warehouse, the use of forklifts and other moving vehicles may be required, which can create struck-by, caught-in-between, and other physical hazards for operators and pedestrians working around the equipment, as well as potential exposure to exhaust gases. Other common equipment includes conveyors, sorters, labelers, and automated pallet wrappers, etc., which may result in worker exposures to unguarded machinery or uncontrolled releases of hazardous energy.

Warehouses may also store chemicals and contain many different types of electrical equipment and systems. Improperly stored chemicals and spills may expose employees to a wide range of health hazards (such as irritation, sensitization, and carcinogenicity) and physical hazards (such as flammability, corrosion, and explosibility). Employees working with electrical equipment may be exposed to dangers such as electric shock, electrocution, fires, and explosions. Temperature extremes may also be a concern. Heat-related illness can affect warehousing workers performing physical work in high heat conditions. Conversely, workers in refrigerated warehouses may be exposed to cold stress hazards.

Hazards at Warehouses

Warehouses are large, dynamic work environments that require the safe coordination of a wide variety of worksite activities. Depending on the products

Warehousing industry workers often handle heavy and/or bulky items and this can lead to ergonomic risk factors, such as repeatedly lifting and lowering heavy items, bending, reaching overhead, pushing

Ergonomics



- **Designing the job to fit the employee, rather than forcing the employee's body to fit the job.**
- **The employer and ergonomist determines worker's capacities and applies that information in designing jobs, products, workplaces, and equipment.**
- **Musculoskeletal disorders (MSDs) are the leading cause of long-term pain and disability world-wide.**

Health and Safety Program

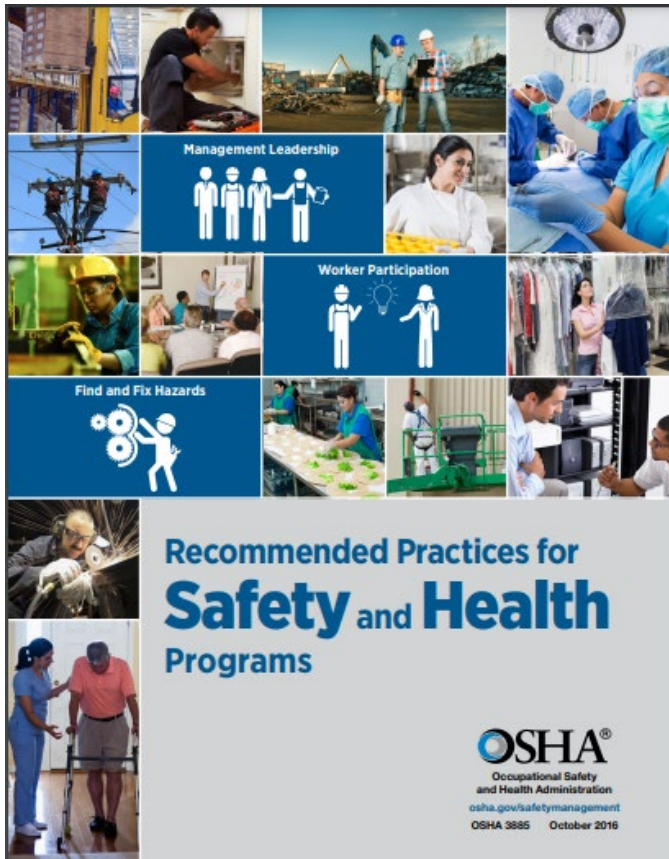
- **Workplace injuries impact workers, their families, and the employer.**
- **An effective HASP:**
 - Prevents worker injuries and illnesses
 - Improves compliance with laws and regulations
 - Engages workers and can improve their job satisfaction
 - Can decrease costs such as workers compensation for injuries
- **There are Three Core Elements of Safety and Health Programs. A larger employer can expand their Safety and Health Program beyond the three elements**

Core Elements of Safety and Health Programs – OSHA's Safe and Sound Campaign



- Management Leadership
- Find and fix hazards
- Worker participation

Expanded Elements of a Health and Safety Program



- Management Leadership
- Worker participation
- Hazard Identification and Assessment
- Hazard Prevention and Control
- Education and Training
- Program Evaluation and Improvement
- Coordination for Host, Staffing Agency, and Contractors

General Employer responsibilities

- **Host and Staffing Employer must provide a safe and healthful workplace to all employees**
- **Both must ensure the workplace meets OSHA Standards**
- **Establish a Health and Safety Program (HASP) strongly recommended or required**
- **How they comply will vary on workplace type and conditions**
- **Determine which OSHA standard or HASP element each will cover**
- **Clearly define staff employee's task assignments**

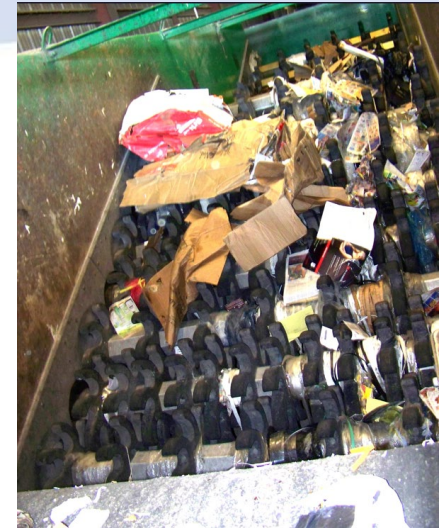
Staffing Agency responsibilities

- **Effective and ongoing Safety and Health Program**
- **Train managers and employees in Safety and Health to recognize hazards**
- **Review the Host's HASP and perform worksite walkthrough with the Host**
- **Identify and correct safety and health hazards from this walkthrough**
- **Give the employees general or specific training based on task assignment**
- **Provide means and procedures to maintain communication with Temporary staff and with Host employer**



Host Employer responsibilities

- **Effective and ongoing Safety and Health Program**
- **Actively work with the Staffing Agency with onsite walkthrough and hazard ID**
- **Provide their HASP to the Staffing Agency for review, and review the Agency's**
- **Define the Temporary Worker's task assignments**
- **Provide a facility and work area orientation for new Temporary Workers**
- **Also provide the Staffing employees site specific training for the task assignment, equivalent to their own employees' training**

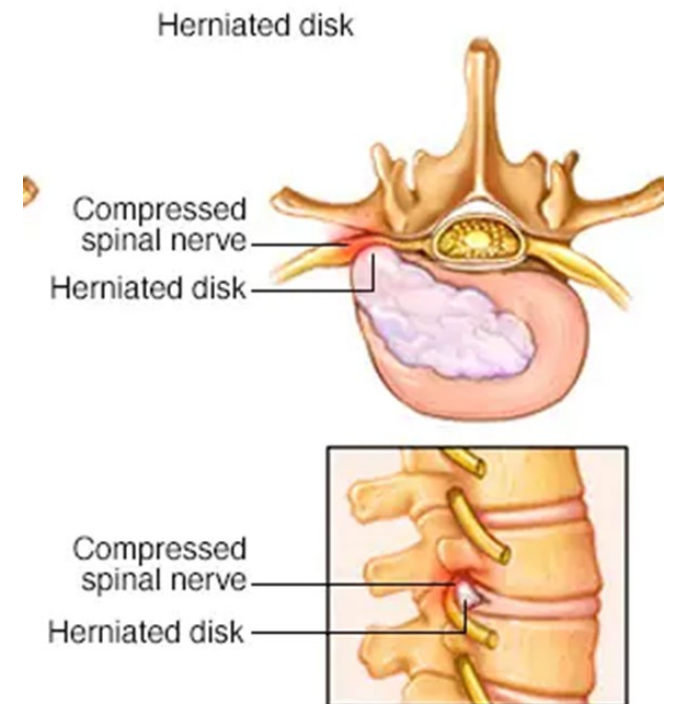


Joint Host and Staffing Agency Responsibilities

- **Review all assignment work sites and areas together – address any hazards such as equipment/machinery, exposures and protections, and PPE.**
- **Agree on scope of Host and Staffing assignment and responsibilities:**
 - **Determine who supervises the Staffing employees**
 - **Host typically provides worksite and program specific training and PPE**
 - **Staffing Agency typically provides general training but can be specific: PIT**
 - **Define roles and responsibilities in writing such as a contract**
- **Define scope of task assignments for the Staffing employees**
- **Share the Staffing employees' safety and health training documents**

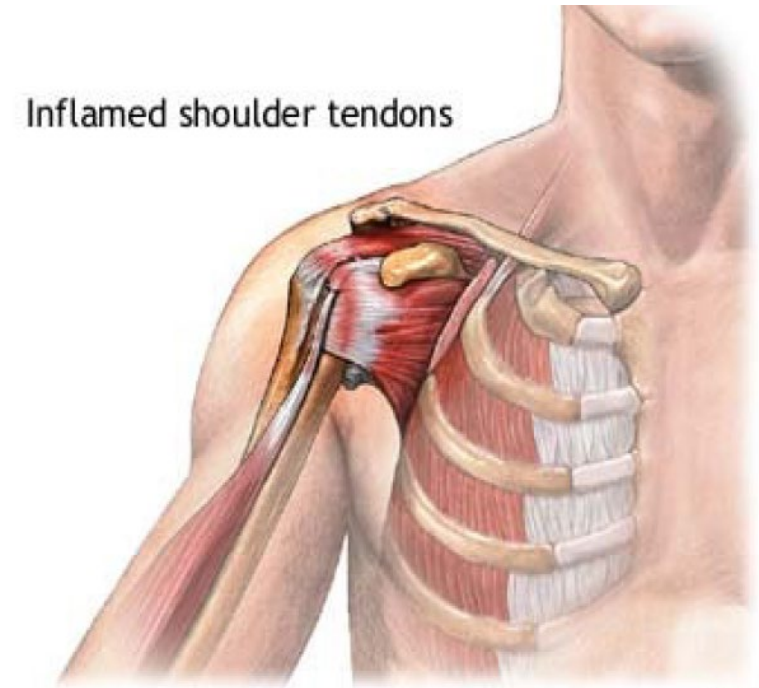
Ergonomic Hazards cause Musculoskeletal Disorders - MSDs

- Injuries of the muscles, nerves, tendons, ligaments, blood vessels, and spine - soft tissue injuries from:
- Lifting heavy items, bending and reaching overhead, pushing pulling, awkward postures, static positions and repetitive motions for long durations, vibration, and contact stress.
- 33% of all occupational injuries are MSDs – in some hazardous workplaces it can exceed 50%
- 1 million workers took days away to treat and recover from MSD in 1999



MSDs Types

- **Low Back – strain, sprain, sciatica, pinched nerve, disc herniation can cause severe pain**
- **Shoulder – rotator cuff tendinitis / tear, causing pain, weakness and limited motion**
- **Wrist / Hand – carpal tunnel syndrome – compression of nerve in wrist causes weakness, numbness or pain**



What industries use Temp workers with high Ergo injury rates

- **Courier and Express Delivery**
- **Warehousing**
- **Healthcare: Hospitals, Nursing and Residential Care**
- **Retail and Wholesale trade (includes materials handling like Warehousing)**



OSHA Enforcement of Ergonomic Hazards

- **Employees have a right to complain to OSHA of hazards including Ergonomic**
- **OSHA original Ergonomics Standard repealed in 2001**
- **OSHA still investigates and issues Citations that carry monetary penalties, or Hazard Alert Letters, to Employers for Ergonomic hazards**
- **The employer must correct the Ergonomic hazards and demonstrate improvement**
- **OSHA also has Programs that require review of Ergonomic hazards in**
 - **National Emphasis Program for Warehousing**
 - **Inspection Guidance for In Patient Healthcare**
 - **Poultry Processing**

General Employer Ergonomics Responsibilities – a HASP that includes an Ergonomics Program

- **Management commitment to define goals and how to achieve them**
- **Ergonomic Hazard Assessment – Injury trends, what tasks, then do Assessments**
- **Involve workers in hazard identification and solutions to hazards – they know**
- **Implement Solutions to reduce or eliminate injuries**
- **Training employees in Ergo hazards, work practices, and early reporting**
- **Medical management – prompt evaluation, treatment, and follow up of MSD injuries**
- **Evaluate success of Ergo Program – lagging and leading indicators**

Staffing Agency and Host Ergo Responsibilities

- **HOST: Generally controls the processes and work methods.**
- **Trains employees on work methods and ergonomic controls.**
- **Do Hazard ID, implement solutions, and track their success.**
- **AGENCY: Review the Host's ergonomic policy and procedures and hazard assessments BEFORE assigning workers**
- **Conduct walkthroughs to ID the processes involving Ergo hazards and their solutions.**
- **Verify the Ergonomic controls are being implemented and maintained.**

Joint Staffing Agency and Host Ergo Responsibilities

- **Training – the Agency does the general Ergo training, the Host the onsite specific**

ERGO Training:

- **Principles of ergonomics and their application to the work with proper use of equipment, tools, and machines if there are engineering controls.**
- **Good work practices including close lifting and what applies in the process**
- **Early recognition of injury types and reporting of early MSD symptoms**

Scenario: Greater Foods Warehousing and Staffing Agency Work Ready Staffing Agency

- Pickers operate a High-Low PIT (forklift) and pick individual items to fulfill a Grocery store order item on a pallet.
- GFW has an Ergonomics Program with employee participation, hazard id and assessments, equipment, and training.
- The orders increased and GFW hired 25 Temporary Workers from WRSA to to pick for 3 months.
- GFW obtained the Temporary Operators Forklift Operator Certifications



Scenario: Greater Foods Warehousing and Staffing Agency Work Ready Staffing Agency

- The Temporary Operators started a 3 month tour, working a 10 hour overnight shift – The Host supervises all workers
- They are given 2 weeks to achieve the standard pace of work
- They are only given a facility tour and general job task training
- One of the solutions is picking layer by layer, and using a Pick Stick when possible
- One Temporary Worker suffered back pain on Day 2, and reported it on Week 3. He can now hardly stand up



A Pick Stick

Scenario: Greater Foods Warehousing and Staffing Agency Work Ready Staffing Agency *

- **WRSA only provided Hazard Communication and Injury reporting training, in addition to the Forklift Certification to their Temporary Operators**
- **GFW did not provide site specific training on preventing Ergonomic injuries using their established procedures, such as layer by layer picking and pick sticks**



*The Scenario is fictitious company names and from the TWI Ergo Bulletin #13

Scenario: Greater Foods Warehousing and Staffing Agency Work Ready Staffing Agency

- **The Host GFW had an obligation to provide site specific Ergonomic training, exercise oversight, and determine if the Temporary Operators followed policy**
- **The Host may be subject to OSHA citations for not implementing and confirming the Temporary Operators followed Ergo policy and controls**
- **The Staffing Agency WRSA did walkthroughs and knew the Temporary Operators would be manually lifting loads. They did not provide general Ergonomic hazard training to include signs and symptoms of injuries and early reporting. They also did not confirm if GFW provided this training**
- **The Staffing Agency may be subject to OSHA citations for not providing general Ergonomic training to employees**

What is Heat Stress?



- **The buildup of heat in the body that cannot be removed by natural mechanisms**
- **The result of internal heat generated by the body (metabolic load) and the external heat load from the work environment**
- **Heat Syncope, Heat Rash, Heat Cramps, Heat Exhaustion, Heat Stroke**
- **Heat illness can be fatal. Workers die from heat stroke every year and every death is preventable**
- **TWI Heat Bulletin #12**

Implement a Heat Stress Program !

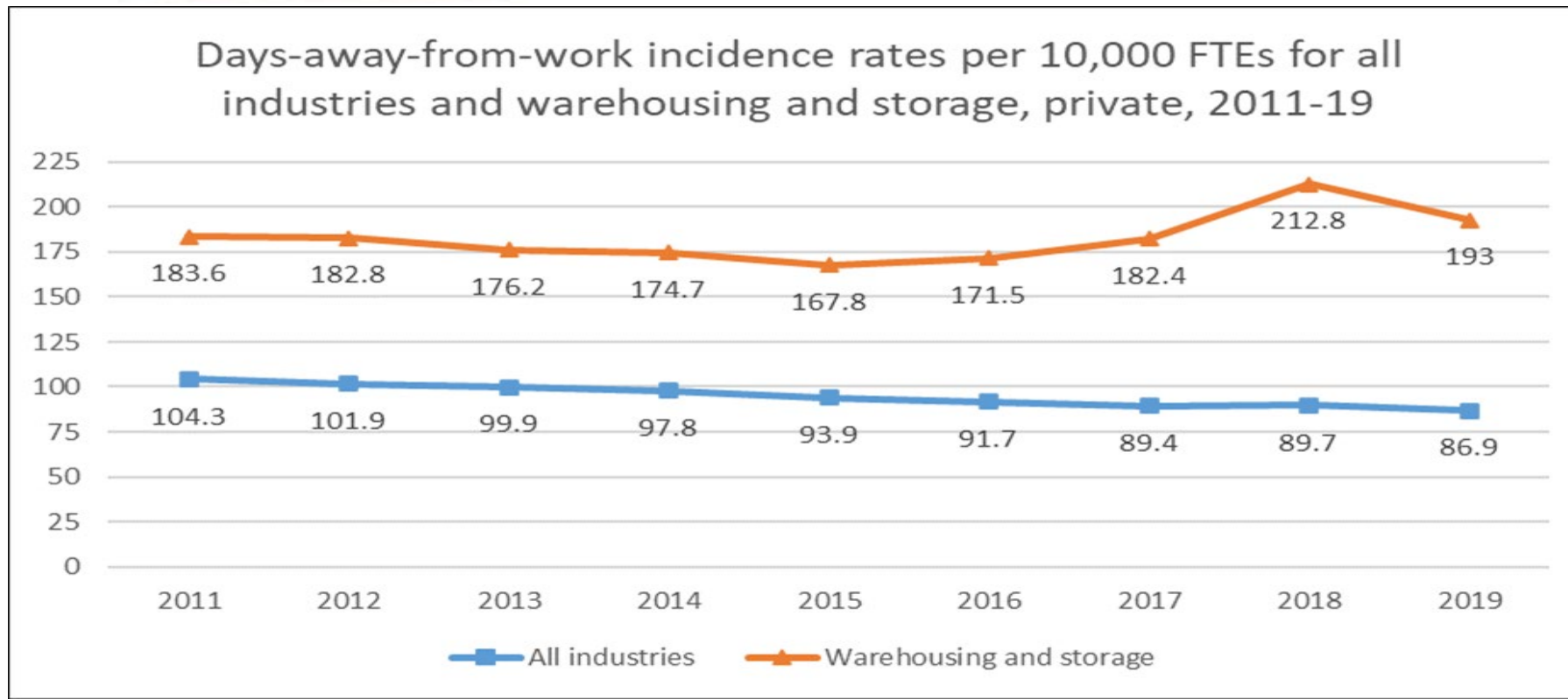
- **Acclimatize workers starting 1st Hot Day**
- **Schedule work earlier or later in the day**
- **Limit strenuous work**
- **Train employees in heat stress illness symptoms**
- **Monitor weather daily for heat advisories and warnings**
- **Encourage hydration early even if they aren't thirsty**
- **Report symptoms immediately and go to a cool down area**



Overview

- Bureau of Labor and Statistics (BLS) data.
- OSHA's National Emphasis Program (NEP).
- Common hazards related to the warehouse and distribution center industry.
- OSHA inspections findings.
- Outreach and Resources.

BLS Data



WWW.BLS.gov public database, Current Employment Statistics (National), Series ID CES4349300001 – Employment (Seasonally Adjusted), NAICS 493 – Warehousing and storage.

OSHA's National Emphasis Program (NEP) on Warehousing and Distribution Centers

- New NEP was published on July 13, 2023, with enforcement inspections commencing on October 16, 2023.
- Targets warehousing and distribution center establishments, as well as high injury rate retail establishments.
- NEP expires in three years on July 13, 2026

OSHA's NEP Inspection Scope

- Comprehensive safety inspections from table 2 NAICS codes with screening of heat and ergonomic health hazards for possible referrals.

Table 2. NAICS Codes covered under this NEP

NAICS CODES	ESTABLISHMENTS
491110	Postal Service (Processing and Distribution Centers only)
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

OSHA's NEP Inspection Scope Cont..

- Partial safety inspections from table 3 NAICS codes high injury rate retail establishments, with focus on warehousing type operations.

Table 3. High Injury Rate Retail Establishments under this NEP

NAICS CODES	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

OSHA Standards Relevant to Warehousing and Distribution

1910 Subpart D	Walking-working surfaces
1910 Subpart E	Exit routes & Emergency Planning
1910 Subpart F	Manlifts
1910 Subpart G	Occupational Health and Environmental Control
1910 Subpart H	Hazardous Materials
1910 Subpart I	Personal Protective Equipment
1910 Subpart J	General Environmental Controls
1910 Subpart K	Medical and First Aid
1910 Subpart L	Fire Protection
1910 Subpart N	Materials Handling and Storage
1910 Subpart O	Machinery and Machine Guarding
1910 Subpart P	Hand and Portable Powered Tools & other Hand-Held Equipment
1910 Subpart S	Electrical
1910 Subpart Z	Toxic and Hazardous Substances



Common Hazards within Warehousing Facilities

- Powered Industrial Trucks Hazards
- Insufficient Personal Protective Equipment
- Lack of Emergency Planning
- Material Handling Deficiencies
- Slips, Trips and Falls
- Electrical Hazards
- Hazard Communication



Powered Industrial Vehicles (forklifts)

- *Forklift Operations*
 - Only trained and certified workers may operate a forklift. (See [29 CFR 1910.178](#)). **No one under the age of 18 may use a forklift.**
 - Always wear a seatbelt, if available.
- *Forklift Maintenance and Repair*
 - Ensure vehicles are maintained and repaired in accordance with manufacturers' recommendations.



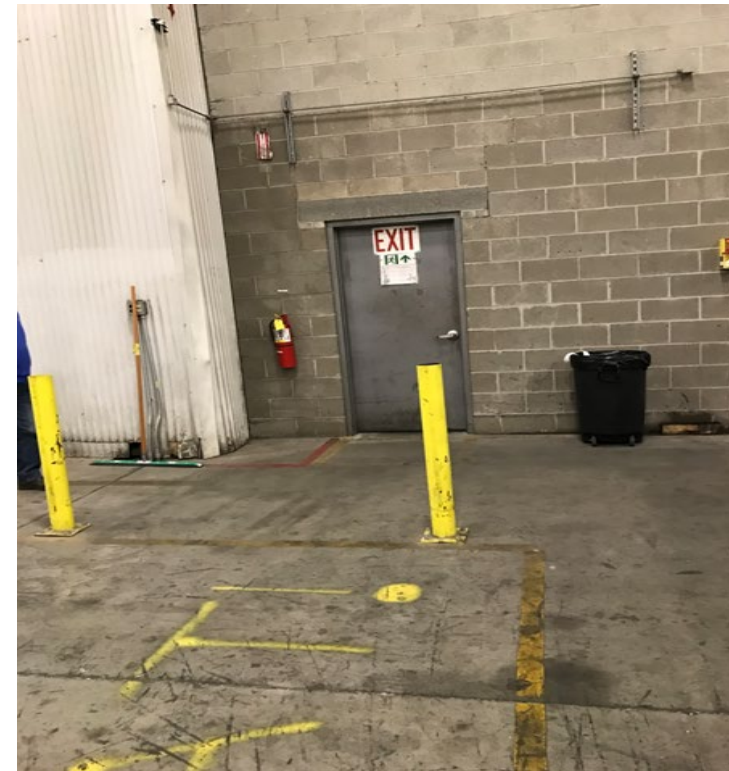
Powered Industrial Vehicles

- *Charging Stations*
 - Provide an eyewash and safety shower facility for workers exposed to battery acids.
 - Ensure that fire extinguishers are available and fully charged.
- *Other Considerations*
 - Maintain safe clearances in the aisles and at the loading docks.
 - Remove from service any forklift found to be in unsafe operating condition.



Exit Routes and Emergency Planning

- Exit routes must be adequately lit.
- Exit signs must be illuminated and clearly visible at all times.
- Exit doors cannot be locked or blocked.



Exit Routes and Emergency Planning Cont..

- Exit routes must not go through a room that can be locked (e.g., a bathroom), and it cannot lead into a dead-end corridor.
- Exit routes and exits must be free and unobstructed.
- Keep safeguards designed to protect workers during an emergency in proper working order.



Materials Handling and Storage

- *Secure Storage*
 - Storage of material shall not create a hazard; it shall be stable and secure against sliding or collapse.
 - Maintain racking systems free from damage to prevent collapse.
 - If damage occurred, the affected area must be isolated, and damaged parts shall be replaced or repaired.



Materials Handling and Storage Cont...

- *Mechanical Equipment*
 - Sufficient safe clearances shall be allowed for aisles, at loading docks, through doorways and wherever turns or passage must be made.
 - Aisles and passageways shall be kept clear and in good condition.
 - Permanent aisles and passageways shall be appropriately marked.



Walking-Working Surfaces (Slips, Trips, and Falls)

- *General considerations*
 - Ensure that each worker on a walking-working surface with an unprotected side or edge that is 4 feet or more above a lower level is protected from falling.
- *Stairs*
 - Equip flights of stairs having at least 3 treads and at least 4 risers with handrails and stair rail systems.
- *Ladders*
 - Inspect ladders to identify any visible defects that could cause injury.



Walking-Working Surfaces (Slips, Trips, and Falls) Cont...

- *Floors*
 - Keep floors and aisles clear of clutter, electrical cords, hoses, spills, and other hazards that could cause slips, trips, or falls.
- *Dockboards*
 - Design, construct, and maintain dockboards to prevent transfer vehicles (e.g., forklifts, power jacks) from running off the dockboard edge.



Electrical

- Ensure sufficient clearance in front of electrical panels and around all electrical equipment. Do not use these areas for storage.
- Close unused openings in cabinets, boxes, and fittings.



Electrical Cont...

- Install and use listed or labeled equipment in accordance with the instructions included in the listing or labeling.
- *Flexible Cords and Cables:*
 - Do not use:
 - As a substitute for fixed wiring.
 - Where attached to building surfaces.
 - Ensure flexible cords and cables are connected to devices and fittings so that strain relief is provided to prevent pull on joints or terminal screws.



Hazard Communication

- Review the written hazard communication program.
- Access to Safety Data Sheets (SDS)
- Workers must be trained on the hazardous chemicals in their workplace.
- Chemical containers must be labeled.

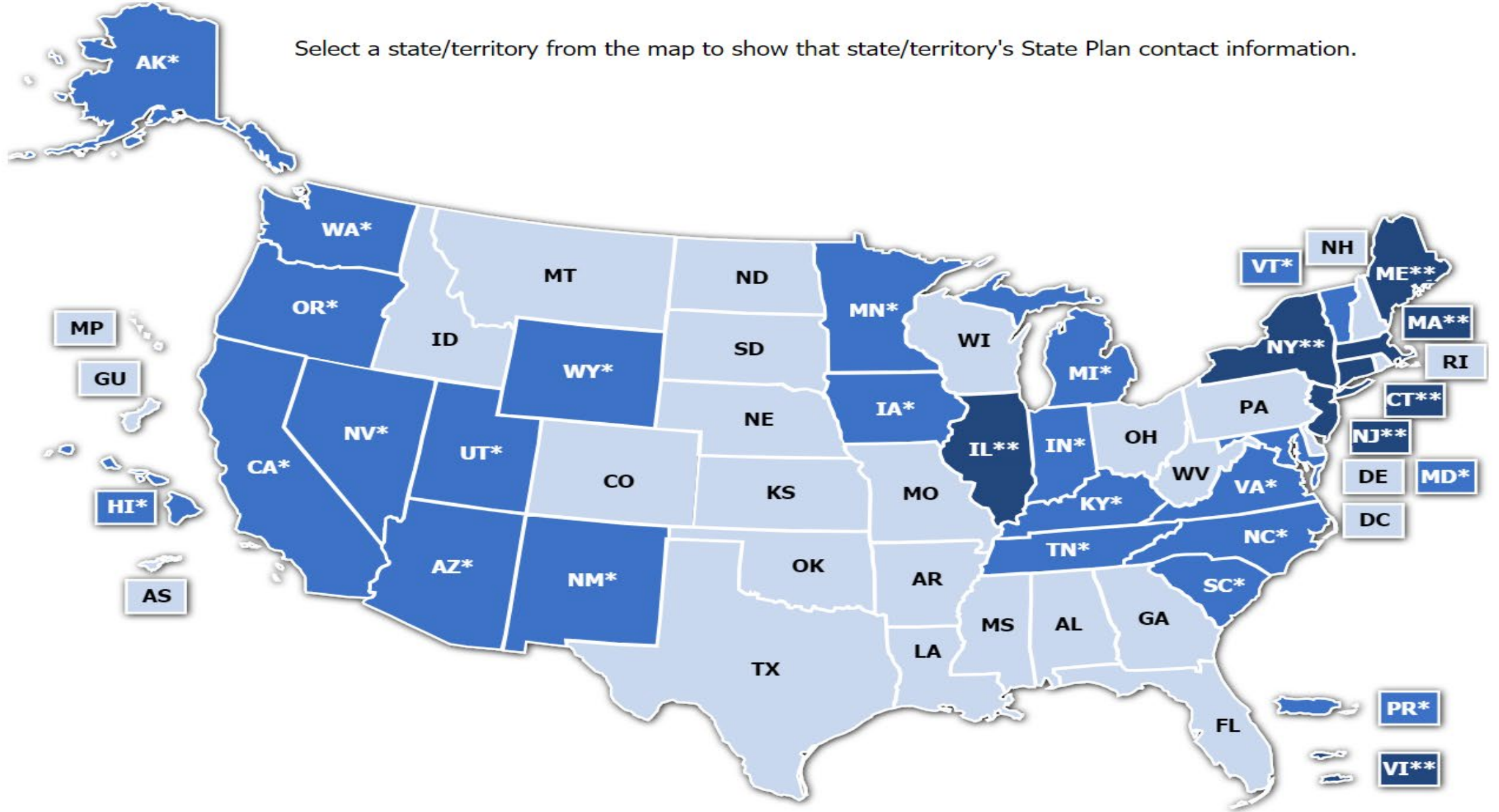


OSHA Inspection Findings

From October 16, 2023- March 4, 2024, OSHA has conducted **877** enforcement inspections within the NEP.

Top Standards Cited	Subpart
1910.37(a)(3)	1910 Subpart E - Exit Routes and Emergency Planning
1910.303(g)(1)	1910 Subpart S - Electrical
1910.157(c)(1)	1910 Subpart L - Fire Protection
1910.178(l)(4)(iii)	1910 Subpart N - Materials Handling and Storage (PIT)
1910.151(c)	1910 Subpart K - Medical and First Aid
1910.178(l)(6)	1910 Subpart N - Materials Handling and Storage (PIT)
1910.305(g)(1)(iv)(A)	1910 Subpart S - Electrical
1910.37(b)(2)	1910 Subpart E - Exit Routes and Emergency Planning
1910.178(a)(4)	1910 Subpart N - Materials Handling and Storage (PIT)
1910.28(b)(1)(i)	1910 Subpart D - Walking-Working Surfaces

Select a state/territory from the map to show that state/territory's State Plan contact information.



***** This state's OSHA-approved State Plan covers private and state/local government workplaces.

****** This state's OSHA-approved State Plan covers state/local government workers only.

(Light Blue) This state (with no asterisk *) is a federal OSHA state.

Safety and Health Program and Temporary Worker Initiative Bulletins including Ergonomics

- [OSHA Temp Workers Webpage](#) - OSHA Temporary Worker Webpage
- [OSHA General Guidance for Hosts and Staffing Agencies](#) - General Guidance
- [OSHA4382.pdf](#) - TWI ERGO BULLETIN NO. 13
- [OSHA Safe and Sound Safety Programs](#) - Safety Program Webpage
- [OSHA Safety Program Recommended Practices](#) - More in depth Guide
- [OSHA Heat Illness](#) - Heat Stress Guides

Temporary Worker Initiative Bulletins Associated with Warehousing

- [OSHA3780.pdf](#)- TWI BULLETIN NO. 2 (PPE)
- [Hazard Communication \(osha.gov\)](#)- TWI BULLETIN NO. 5
- [Powered Industrial Truck Training \(osha.gov\)](#)- TWI BULLETIN NO. 7
- [The Control of Hazardous Energy \(Lockout/Tagout\) \(osha.gov\)](#)- TWI BULLETIN NO. 10

Warehousing Resources

- [Warehousing - Overview | Occupational Safety and Health Administration \(osha.gov\)](#)
- [eTools: Grocery Warehousing - Storage | Occupational Safety and Health Administration \(osha.gov\)](#)
- [National Emphasis Program on Warehousing and Distribution Center Operations | Occupational Safety and Health Administration \(osha.gov\)](#)



OSHA's Warehouse Webpage

Hazards and Solutions

Warehouse workers face many hazards, but proper design, planning and training can keep them safe. These references can aid you in recognizing and controlling those hazards.

[Ergonomics and Musculoskeletal Disorders](#)

[Powered Industrial Trucks \(Forklifts\)](#)

[Materials Handling](#)

[Slips, Trips, and Falls](#)

[Hazardous Chemicals](#)

[Emergency Planning](#)

[Electrical Hazards](#)

[Lockout/Tagout](#)

[Heat Illness](#)

[Automation and Robotics](#)

[Refrigerated Warehousing](#)

[Temporary Workers](#)

[Stress and Fatigue](#)



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Safety and Health Topics > Warehousing

Warehousing

Overview

The warehousing and storage industry includes establishments operating facilities for general merchandise, refrigerated goods, and other products. These establishments may also provide logistical services relating to goods distribution. Potential hazards in this rapidly growing, fast-paced industry include those associated with powered industrial trucks (forklifts), ergonomics, material handling, hazardous chemicals, slip/trip/falls, and robotics. The most common injuries are musculoskeletal disorders (mainly from overexertion in lifting and lowering) and being struck by powered industrial trucks and other materials handling equipment.

Know the Law

Lists OSHA and consensus standards applicable to warehousing operations.

[More >](#)

Hazards and Solutions

Provides information on recognizing and controlling warehousing hazards.

[More >](#)

Related Topics

- [COVID-19](#)
- [Ergonomics](#)
- [Heat](#)
- [Holiday Workplace Safety](#)
- [Powered Industrial Trucks](#)
- [Temporary Workers](#)

[Additional Resources](#) | [National Emphasis Program](#)

[/warehousing/resources](#)

Thank You – Questions ?



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