
MIOSHA

Michigan Occupational Safety and Health Administration (MIOSHA)
Department of Labor and Economic Opportunity (LEO)

AGENCY INSTRUCTION

DOCUMENT IDENTIFIER:
MIOSHA-COM-23-2

DATE:
December 12, 2023

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

- I. Purpose. This instruction adopts the federal Occupational Safety and Health Administration (OSHA) National Emphasis Program (NEP) to identify and reduce or eliminate worker exposures to common hazards in warehousing and distribution center operations.
- II. Scope. This instruction applies to the General Industry Safety and Health Division (GISHD) and the Consultation Education and Training (CET) Division.
- III. References.
 - A. General Industry Safety and Health Division, [General Industry System for Programmed Inspections](#), as amended.
 - B. Occupational Safety and Health Administration Instruction CPL 03-00-026, July 13, 2023, [National Emphasis Program on Warehousing and Distribution Center Operations](#).
- IV. Distribution. MIOSHA Staff; Federal OSHA; S-drive Accessible; MIOSHA Messenger; and Internet Accessible.
- V. Next Review Date. This instruction will be reviewed in one year from date of issuance.
- VI. Contact. [Adrian Z. Rocskey](#), GISHD Director, and [Tarah M. Kile](#), CET Director.
- VII. Originator. Barton G. Pickelman, Director.
- VIII. Background. 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 death or serious physical harm.

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. In the United States, from 2017 through 2021, the incidence rate of nonfatal occupational injuries and illnesses was significantly higher in establishments associated with warehousing and distribution center operations than in all private industry (see [Appendix A](#)). This was true for both the total recordable case rate and the rate of cases involving days away from work, restricted activity, or transfer (DART rate). The elevated rates

were most pronounced in the subsectors of carriers and express delivery services, general warehousing and distribution, refrigerated warehousing and distribution, and postal service processing and distribution. The same pattern of elevated nonfatal injury and illness rates in warehousing and distribution was also found in Michigan (see [Appendix B](#)).

- IX. Action. With this agency instruction, MIOSHA adopts OSHA CPL 03-00-026, National Emphasis Program on Warehousing and Distribution Center Operations. In lieu of creating a new site targeting system for warehousing and distribution centers or using data from OSHA’s Injury Tracking Application, MIOSHA will use its current inspection priority system for general industry, which already encompasses establishments with North American Industry Classification System (NAICS) codes that this NEP covers. The MIOSHA system is described in the document entitled General Industry System for Programmed Inspections. References in the NEP to federal offices, federal documents, and federal programs shall be interpreted as the corresponding item at MIOSHA.
- X. Covered Industries. This NEP covers warehousing and distribution centers, mail processing and distribution centers, couriers and express delivery services, and local messengers and delivery industries (the NAICS listed in Appendices [A](#) and [B](#)), as well as high-injury-rate retail establishments (NAICS in [Appendix C](#)). The NEP does not cover U.S. Postal Service processing and distribution centers as federal OSHA has jurisdiction over those facilities in Michigan.
- XI. OSHA Information System (OIS) Coding.
 - A. For all enforcement inspections in warehouses and distribution centers (i.e., the NAICS covered by this instruction), select “WAREHOUSE23” under National Emphasis Programs on the Inspection tab, in the Inspection Data section.
 - B. Compliance assistance conducted under this SEP shall be coded as “WAREHOUSE23” under the National Emphasis Program field on the Request tab.
- XII. Outreach Activities. MIOSHA’s consultation program will use the same strategic approach as the enforcement division for targeting workplaces and activities covered by this NEP. [Appendix D](#) is a copy of the outreach plan. Outreach will include an announcement of the NEP through GovDelivery message, MIOSHA eNews, and social media; a MIOSHA News article on warehousing or distribution centers; a review of MIOSHA publications, fact sheets, presentations, and external training to ensure the hazards of the industry are covered; and training for MIOSHA staff on the NEP.

Appendix A**2017-2021 Five-Year Average Incidence Rates of Nonfatal Occupational Injuries and Illnesses by Industry and Case Types in the U.S.**

Industry	NAICS Code	Total Recordable Cases Rate	Total DART Rate
All Private Industry		2.76	1.6
Postal Service (Processing and Distribution Centers only)	491110	4.79*	4.27*
Couriers and Express Delivery Services	492110	8.14	6.3
Local Messengers and Local Delivery	492210	3.9	2.6
General Warehousing and 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.

Appendix B

2017-2021 Five-Year Average Incidence Rates of Nonfatal Occupational Injuries and Illnesses by Industry and Case Types in Michigan*

Industry	NAICS Code	Total Recordable Cases Rate	Total DART Rate
All Private Industry		3.0	1.7
Couriers and Messengers	492	6.7	5.1
Warehousing and Storage	493	5.5	4.6

* Average of annual rates from US Bureau of Labor Statistics.

Appendix C

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

Appendix D

Outreach Plan

Name of Initiative: National Emphasis Program (NEP) on warehousing and distribution centers

Initiative Liaison: Barrington Carr **Email:** carrb@michigan.gov **Phone:** 517-284-7730

Date Submitted: 8/21/2023

Check all that Apply: New/Revised Standard New Targeted Industry New Targeted Hazard

Divisions Involved:

- | | | |
|---|---|---|
| <input type="checkbox"/> Administration | <input type="checkbox"/> Appeals | <input checked="" type="checkbox"/> CET
(Lead) |
| <input type="checkbox"/> CSHD | <input checked="" type="checkbox"/> GISHD | <input type="checkbox"/> TSD |

Purpose/Scope:

This plan identifies MIOSHA activities that will be completed from effective date of the NEP to the expiration date to educate MIOSHA staff, as well as employers and employees in the State of Michigan, about the implementation of the NEP to identify and reduce or eliminate worker exposures to common hazards in the warehousing and distribution industries. This outreach program will inform MIOSHA staff, employers, and employees of the NEP and will be conducted for at least three months at the start of the NEP.

1. Policy/Procedure

New or revised MIOSHA policies, procedures, instructions, or interpretations.

Federal OSHA has an Instruction CPL 03-00-026, National Emphasis Program on Warehousing and Distribution Center Operations. MIOSHA is now adopting the OSHA instruction and NEP.

2. Staff Training

MIOSHA staff training. All staff with enforcement or consultation responsibilities under the NEP will need training. CET will coordinate with GISHD to update the provided PowerPoint (PPT) from OSHA to include Michigan-specific information. The PPT will be available for staff training on the NEP. The training will be provided jointly to all CET and GISHD staff with responsibilities under the NEP via a virtual training that will be recorded for future use.

3. Communication (Check all that apply.)

Press Release

MIOSHA News – GISHD will author one or more warehousing or distribution center articles during the NEP.

MIOSHA eNews

MIOSHA Website

MIOSHA Messenger – When NEP is effective, announcement will be made to MIOSHA staff.

GovDelivery Message – When NEP is effective, CET will draft announcement to its subscribers.

Social media –

- When NEP becomes effective, CET will post announcement to social media.
- CET will post, throughout the year, all related fact sheets to social media.

Other –

- Include information on no-cost on-site consultation services.
- Add a slide for the NEP to all applicable MIOSHA Training Institute courses (ex. Aerial Lifts).
- Provide Warehousing and Distribution Centers hazards presentation at 2024 Michigan Safety Conference.

4. Educational Resources (Check all that apply.)

Promote existing DVDs in lending library and available for MIOSHA staff use.

New reference materials for MIOSHA staff use.

New or revised MIOSHA publications/fact sheets – Liaison will confirm that for each of the top 10 commonly cited MIOSHA standards for the NEP, there is a current fact sheet available. If a fact sheet is needed, it will be generated.

New or revised MIOSHA presentations/training – CET will create and utilize consistent PPT message for external client use.

5. Outreach Activities (Check all that apply.)

Develop, revise, and conduct training program. Training and Consultation Core Committee to create training presentation for use by CET staff.

Consultation. CET staff to discuss warehousing and distribution hazards with clients as appropriate, even if clients do not have primary NAICS for entry into NEP.

Alliances/partnerships with impacted public or private organizations.

- Contact all alliance partners with potential warehousing and distribution center contacts.

Letters to target industries – Informing them of CET services, make them aware of the NEP.

Targeted enforcement – As specified in NEP.

No outreach activities needed.

6. Data Generated (Check all that apply.)

Number of training seminars conducted.

Number of employees trained.

Number of consultation activities conducted.

Number of compliance inspections conducted.

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7. Workgroup

Create a workgroup to implement outreach plan. Staff from CET, GISHD, and CSHD to be members.

Anticipated Launch Date: 12/12/2023

Length of Initiative: 1 year