



**STATE OF TENNESSEE  
DEPARTMENT OF LABOR AND WORKFORCE DEVELOPMENT  
Division of Occupational Safety and Health  
220 French Landing Drive, 3rd Floor  
Nashville, Tennessee 37243-1002**

**MEMORANDUM**

DATE: September 08, 2023  
TO: File  
FROM: Rusty Dugan  
SUBJECT: National Emphasis Program on Warehousing and Distribution Center  
Operations CPL 03-00-026

Tennessee OSHA is adopting the National Emphasis Program on Warehousing and Distribution Center Operations (CPL 03-00-026) identically, except for the Heat NEP. References to the Heat NEP will not apply. The CPL will be renamed CPL-TN 03-00-026. For questions, please contact Rusty Dugan at (615) 770-1876 or [Russell.Dugan@tn.gov](mailto:Russell.Dugan@tn.gov).



# OSHA INSTRUCTION

U.S. DEPARTMENT OF LABOR

Occupational Safety and Health Administration

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**DIRECTIVE NUMBER:** CPL 03-00-026

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**SUBJECT:** National Emphasis Program on Warehousing and Distribution Center Operations

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**DIRECTORATE:** Office of General Industry and Agricultural Enforcement

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**SIGNATURE DATE:** June 14, 2023

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**EFFECTIVE DATE:** July 13, 2023

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## ABSTRACT

**Purpose:**

This Instruction describes policies and procedures when inspecting warehousing and distribution center operations, mail/postal processing and distribution centers, parcel delivery/courier services, and certain high injury rate retail establishments. All inspections under this National Emphasis Program (NEP) are comprehensive safety inspections, except for high injury rate retail establishments. Inspections under this NEP of high injury rate retail establishments shall be partial inspections concerning the storage and loading areas unless OSHA expands the scope of the inspection when there is evidence that violative conditions may be found in other areas of that establishment.

All inspections under this NEP 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, and fire protection. Heat and ergonomic hazards shall be considered during all inspections covered by this NEP and a health inspection shall be conducted if OSHA learns that heat and/or ergonomic hazards are present.

**Scope:**

This Instruction applies OSHA-wide.

**References:**

See Section III for references.

**State Impact:**

Notice of Intent and Adoption required. See paragraph VII.

**Action Offices:**

OSHA National, Regional, and Area Offices, State Plans, and Onsite

Consultation programs.

**Originating Office:** Directorate of Enforcement Programs, Office of General Industry and Agricultural Enforcement.

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By and Under the Authority of

DOUGLAS L. PARKER  
Assistant Secretary

## **Executive Summary**

This Instruction provides guidance to the OSHA National, Regional, and Area Offices when inspecting warehousing and distribution center operations, mail/postal processing and distribution centers, parcel delivery/courier services, and certain high injury rate retail establishments. The Bureau of Labor Statistics (BLS) history shows that injury and illness rates for these establishments are significantly higher than for other establishments. The inspections under this NEP, except for high injury rate retail establishments, will be comprehensive safety inspections and will focus on workplace hazards common to those industries, including powered industrial vehicle operations, material handling/storage, walking-working surfaces, means of egress, and fire protection. Heat and ergonomic hazards must be considered during all inspections covered by this NEP and a health inspection shall be conducted if OSHA learns that heat and/or ergonomic hazards are present.

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**I. Purpose**

This Instruction describes policies and procedures for implementing a National Emphasis Program (NEP) to identify and reduce or eliminate hazards during warehousing and distribution center operations, mail/postal processing and distribution centers, parcel delivery/courier services, and certain high injury rate retail establishments.

**II. Scope**

This Instruction applies OSHA-wide.

**III. References**

- A. Final Rule at 79 FR 56129-56188, Occupational Injury and Illness Recording and Reporting Requirements – NAICS Update and Reporting Revisions.
- B. 29 CFR Part 1904, Recording and Reporting Occupational Injuries and Illnesses.
- C. 29 CFR Part 1910, Subpart D, Walking-Working Surfaces.
- D. 29 CFR Part 1910, Subpart E, Exit Routes and Emergency Planning.
- E. 29 CFR Part 1910, Subpart I, Personal Protective Equipment.
- F. 29 CFR Part 1910, Subpart L, Fire Protection.
- G. 29 CFR Part 1910, Subpart N, Materials Handling and Storage.
- H. CPL 02-00-164, Field Operations Manual (FOM), April 14, 2020.
- I. CPL 02-00-025, Scheduling System for Programmed Inspections, January 4, 1995.
- J. OSHA Instruction ADM 03-01-005, OSHA Compliance Records, August 3, 1998.
- K. Revised Interim Enforcement Procedures for Reporting Requirements under 29 CFR § 1904.39, March 4, 2016.
- L. Interim Enforcement Procedures for Failure to Submit Electronic Illness and Injury Records under 29 CFR § 1904.41(a)(1) and (a)(2), February 21, 2018, or subsequent guidance.
- M. National Office memorandum to Regional Administrators dated November 12, 2014, Establishment-Targeting Lists for Emphasis Programs.
- N. CPL 02-00-051, Enforcement Exemptions and Limitations under the

Appropriations Act.

**IV. Expiration Date**

This Instruction will terminate three years from the effective date.

**V. Cancellations**

This Instruction shall supersede Regional Emphasis Programs (REPs) and Local Emphasis Programs (LEPs) that are substantially similar. REPs/LEPs that cover additional establishments, NAICS, or have additional elements will remain in effect unless withdrawn or upon expiration. Phasing out of substantially similar REPs/LEPs shall occur following the 90-day outreach period.

**VI. Action Offices**

- A. Responsible Office. Directorate of Enforcement Programs (DEP), Office of General Industry and Agricultural Enforcement.
- B. Action Offices. OSHA Regional and Area Offices, State Plan and OSHA On-site Consultation Programs.
- C. Information Offices. OSHA National Office.

**VII. State Plan Impact – Notice of Intent and Adoption Required**

This Instruction establishes a federal program change that creates an NEP for warehousing and distribution center operations, mail/postal processing and distribution centers, parcel delivery/courier services, and certain high injury rate retail establishments. Due to the seriousness of the hazards associated with these facilities and the prevalence of these hazards nationwide, State Plans are required to participate in this NEP. State Plans have the option of adopting an identical or different emphasis program, but the program must be at least as effective as this directive.

Within 60 days of the effective date of this Instruction, a State Plan must submit a notice of intent indicating whether the State Plan will adopt or already has a warehousing and distribution center operations emphasis program that is identical to or at least as effective as this program. State Plan adoption, either identical or different, should be accomplished within six months. If adopting the identical program, the State Plan must provide the date of adoption to OSHA, due within 60 days of adoption. If the State Plan adopts or maintains a warehousing and distribution operations emphasis program that differs from this Instruction, the State Plan must identify the differences and may either post its policy on its website and provide the link to OSHA or submit an electronic copy to OSHA with information on how the public may obtain a copy. This action must occur within 60 days of the date

of adoption. OSHA will post summary information of the State Plan responses to this directive on its website at: [www.osha.gov/dcsp/osp/index.html](http://www.osha.gov/dcsp/osp/index.html).

**VIII. Background**

Warehousing and Distribution Center Operations, Mail/Postal Processing and Distribution Centers, 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 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. From 2017 through 2021, the five-year 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 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, United States Postal Service processing 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.

Table 1. 2017-2021 five-year average incidence rates of nonfatal occupational 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
Postal Service (Processing &	491110	4.79*	4.27*



Distribution Centers only)			
Couriers and Express Delivery Services	492110	<b>8.14</b>	<b>6.3</b>
Local Messengers and Local Delivery	492210	<b>3.9</b>	<b>2.6</b>
General Warehousing & Storage	493110	<b>5.18</b>	<b>4.06</b>
Refrigerated Warehousing and Storage	493120	<b>5.16</b>	<b>4.06</b>
Farm Product Warehousing and Storage	493130	<b>3.08**</b>	<b>2.0**</b>
Other Warehousing and Storage	493190	<b>2.86</b>	<b>2.2</b>

\* 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, Mail/Postal Processing and Distribution Centers, and Parcel Delivery/Courier Services covered under this NEP.

<b>NAICS CODES</b>	<b>ESTABLISHMENTS</b>
491110	Postal Service (Processing & 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

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 partial 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 29 CFR 1904.41 through 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, Warehouse clubs and supercenters- 452311.** High-risk retail establishments in those NAICS codes are covered by this NEP. Inspections in these establishments under this NEP shall cover the loading and storage areas, and OSHA may expand the scope of the partial inspection when there is evidence (e.g., injuries or illnesses recorded in both OSHA forms 300 and 301, employee statements, or “plain view” observations) that violative conditions may be found in other areas of that establishment.

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

<u>NAICS CODES</u>	<u>HIGH INJURY RATE RETAIL ESTABLISHMENTS</u>
444110	Home Centers
444130	Hardware Stores
444190	Other Building Material Dealers
445110	Supermarkets and other grocery stores
452311	Warehouse Clubs and Supercenters

## IX. Site Selection

Scheduling/Site Selection. Targeting establishments for a programmed inspection must use neutral and objective selection criteria. Area Offices (AO) will be provided two separate lists to be inspected under this NEP: a list of establishments taken from Table 2 of this NEP; and a list of high-rate retail establishments taken from Table 3.

- A. The list of industries in Table 2 (page 4) of this NEP will be used to create a master list of targeted establishments within the identified NAICS codes. A list of establishments that are in the local jurisdiction of each AO will be generated by the Office of Statistical Analysis (OSA) ListGen application. ListGen assigns random numbers and provides the establishment lists in random number order. Acceptable methods for generating cycles can be found in the memorandum dated November 12, 2014, [Establishment-Targeting Lists for Emphasis Programs](#). Subsequent cycles will be created in the same manner until this NEP is cancelled or until all establishments on the list have been assigned to a cycle. Cycles may be created all at once or as necessary and need not be of the same size. The AO will inspect establishments in the random number order as provided on the list to

ensure neutrality. OSA will provide each AO with access to software and a database that includes the establishments with the NAICS codes covered under this NEP.

- B. The list of establishments targeted within the NAICS codes in Table 3 of this NEP will be used to create an additional master list of targeted establishments in those NAICS that must also be inspected. A list of establishments that are in the local jurisdiction of each AO will be generated by OSA based on ITA data.

**X. Inspection Scheduling**

This NEP covers warehousing and distribution centers, mail processing 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.

- A. Warehouses and Distribution Centers. This NEP targets warehousing and distribution center operations, mail/postal processing and distribution centers, 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, and fire protection. Heat and ergonomic hazards must be considered and documented during each inspection under this NEP, and a health inspection opened if the Compliance Safety and Health Officer (CSHO) learns that heat and/or ergonomic hazards are present.
- OSA will provide to each Area Office through ListGen a list of establishments from the NAICS in Table 2 within the AO's geographical jurisdiction.
  - Regional/Area Offices will ensure that the selection list will be handled and maintained per [OSHA Instruction ADM 03-01-005, OSHA Compliance Records](#).
- B. High Injury Rate Retail Establishments. OSA will prepare a list of high injury rate retail establishments in the NAICS codes identified in Table 3 each calendar year, based on the highest DART rates as indicated by ITA data. OSA will then provide each AO with a list of these establishments within the Area Office's geographical jurisdiction. Each AO must complete an inspection of all the retail establishments prior to receiving a new list for the following year's cycle. 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, and fire protection. Heat and ergonomic hazards must be considered and documented during each inspection under this NEP, and a health inspection

opened if the CSHO learns that heat and/or ergonomic hazards are present. High-risk retail establishments in those NAICS codes are covered by this NEP. Inspections in these establishments under this NEP shall cover the loading and storage areas, and OSHA may expand the scope of the partial inspection when there is evidence (e.g., injuries or illnesses recorded in both OSHA forms 300 and 301, employee statements, or "plain view" observations) that violative conditions may be found in other areas of that establishment.

- C. Cycle Size. The AO must schedule inspections by establishing a cycle. A "cycle" is a subset of establishments from the Master List and allows the AO to use its enforcement resources more efficiently. Rearranging establishments' order within a cycle is reasonable because it furthers OSHA's legitimate goal of efficient allocation of inspection resources.

The AO can schedule inspections in the following manners:

1. If the AO intends to inspect the entire Master List, it can schedule the inspections in any order. If the AO uses this method, it must account (through inspections and deletions) for the entire list. The AO cannot inspect off a new list until the entire previous list is completed.
2. The AO can inspect the facilities in the random number order provided. If the AO uses this method, it does not need to complete the entire Master List.
3. The AO can create cycles by choosing a set number of establishments from the Master List, sorted in random number order. For example, the AO can select the first ten establishments on the Master List, sorted by ascending random number as a first cycle of 10 establishments. The AO can then inspect those establishments in any order but must finish the cycle prior to beginning a second cycle. Once the first cycle is complete, the AO can inspect the next ten establishments on the randomized Master List as its second cycle.

- D. Deletions.
- The AO must delete from the master list any retail establishments/stores that are not included on the high injury rate retail establishment list.
  - The AO must delete from the master list any establishments known to be out of business, documenting the basis for such determinations. This documentation should be kept as an attachment to the targeting list.
  - The AO must assure that selected establishments do not fall within the scope of the current Appropriations Act (CPL 02-00-051, Enforcement Exemptions and Limitations under the Appropriations Act).

- The AO must 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.
  - The AO must delete from the master list any facilities not likely to be engaged in any of the industries covered by this NEP (*i.e.*, warehousing/distribution, postal processing/distribution activities, couriers and express delivery services, and local messengers and local delivery industries), documenting the basis for such determinations.
- E. 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, and fire protection. Heat and ergonomic hazards must be considered and documented during each inspection under this NEP, and a health inspection opened if the CSHO learns that heat and/or ergonomic hazards are present. In addition to the guidelines provided in this NEP, the inspections must be handled in accordance with [FOM Chapter 9](#), Complaint and Referral Processing, and [Chapter 11, Imminent Danger, Fatality, Catastrophe, and Emergency Response](#).
- F. Follow-up Inspections. Follow-up inspections are to be conducted in accordance with [FOM, Chapter 3, Section XII.K. Follow-up and Monitoring Inspections](#), based on available resources.

## XI. Inspection Procedures

- A. Scope. This NEP covers both programmed and unprogrammed safety inspections, and all inspections will be conducted in accordance with provisions of the FOM, Chapter 3, Inspection Procedures. Complaints and referrals pertaining to establishments covered under this NEP should be processed in accordance with the procedures outlined in [Chapter 9 of the OSHA FOM CPL 02-00-164](#).

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

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

- B. 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), the CSHO will also verify with the employer the location where the warehousing and/or distribution center activities are being conducted in the workplace. In addition, OSHA 300 logs, 300A summaries, and OSHA 301 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:

1. The site NAICS code is not listed in Table 2 of this NEP, or
2. The site was not on the list of high injury rate retail establishments provided from OSA.

If the CSHO does not conduct an inspection, the CSHO must document the reason(s) for not inspecting, exit the establishment, and code inspection in OIS as “No Inspection.”

- C. ITA Non-responders. When conducting an inspection of a non-responder employer, CSHOs must follow the guidance listed in OSHA’s Interim Enforcement Procedures for Failure to Submit Electronic Illness and Injury Records under 29 CFR § 1904.41(a)(1) and (a)(2), or subsequent guidance, for citing failure to submit violations.
- D. 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.
- E. 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 scope shall be expanded in accordance with the NEP for Outdoor and Indoor Heat-Related Hazards (Heat NEP) and a health inspection shall be opened.

The Heat NEP and this NEP have multiple NAICS codes that are targeted within both respective emphasis programs. If the establishment is targeted under both the Warehousing and Distribution NEP and the Heat NEP, the safety and health inspections may be conducted concurrently under both NEPs. See [CPL 03-00-024](#); [National Emphasis Program - Outdoor and Indoor Heat-Related Hazards \(osha.gov\)](#)

- F. 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. When exposures to ergonomic hazards are occurring, the inspection scope shall be expanded, and a health inspection shall be opened.

**XII. Recording in OIS**

- A. Programmed Inspections under the Warehousing and Distribution Center Operations NEP Only. All inspections opened from the targeting lists under this NEP will be coded as initiating type Programmed Planned, Comprehensive, and “WAREHOUSE23” shall be selected as the National Emphasis Program and the Primary Emphasis Program.

Additionally, inspections conducted under this NEP are to be coded under Inspection Category as a “Safety” inspection.

Inspections opened under the targeting list that are “No Inspection” will also be coded pursuant to this paragraph, with the reason for not conducting the inspection (e.g., number of employees less than 10).

- B. Unprogrammed Inspections Combined with Warehousing and Distribution Center Operations NEP. All unprogrammed inspections that are expanded by this NEP will be coded as “WAREHOUSE23”.
- C. Other Emphasis Program Inspections with Warehousing and Distribution Center Operations NEP. Enforcement activities related to warehousing hazards under other NEPs and/or LEPs, may be coded as “WAREHOUSE23” under the Secondary National Emphasis Program if the inspection is expanded per this directive.

**XIII. Outreach**

Each Regional Office (RO) and AO must implement a 90-day outreach program that supports the purpose of this NEP. During this period, the covered industries with NAICS codes in Table 2 will be offered outreach prior to undergoing inspections under this NEP. Outreach also will include Occupational Injury and Illness Recording and Reporting Requirements. Letters and news releases to local and national news organizations and trade magazines can assist with disseminating information about this NEP. Outreach programs with employers, professional associations, and local unions may include meetings, training, education, speeches, or other activities designed to involve labor and management in the identification and elimination of hazards associated with amputations and machinery. ROs and AOs have discretion to disseminate outreach materials to stakeholders, which may include employees,

employers, professional associations, and local unions.

Small business that may be inspected under this NEP should be referred to OSHA's on-site consultation program at [On-Site Consultation | Occupational Safety and Health Administration \(osha.gov\)](#).

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

#### **XIV. Program Review**

To assess the effectiveness of this NEP, DEP will review outcomes within 12 months of issuance, per ADM 03-00-003, to determine whether the emphasis program will be continued.

Data on effectiveness may include:

1. The number of employers covered by the inspections
2. The number of workers removed from hazards
3. Abatement measures implemented
4. Number of violations related to specific targeted hazards
5. Any indices that relate directly to measures that may be included in the DOL Strategic Plan and/or the OSHA Agency Management Plan.