

**VOSH PROGRAM DIRECTIVE:****14-443****ISSUED: April 15, 2024****Subject****Warehousing and Distribution Center Operations National Emphasis Program****Purpose**

This Directive describes policies and procedures when inspecting warehousing and distribution center operations, mail/postal processing and distribution centers (non-U.S. Postal Service), parcel delivery/courier services, and certain high injury rate retail establishments. All inspections under this Directive are comprehensive safety inspections, except for high injury rate retail establishments. Inspections under this Directive of high injury rate retail establishments shall be partial inspections concerning the storage and loading areas unless VOSH 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 Directive 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 Directive and a health inspection shall be conducted if VOSH learns that heat and/or ergonomic hazards are present.

*This Program Directive is an internal guideline, not a statutory or regulatory rule, and is intended to provide instructions to VOSH personnel regarding internal operation of the Virginia Occupational Safety and Health Program and is solely for the benefit of the program. This document is not subject to the Virginia Register Act or the Administrative Process Act; it does not have general application and is not being enforced as having the force of law.*

**Scope**

This Directive applies VOSH-wide.

**Reference**

Consult as appropriate.

- A. 1910, Subpart E, Exit Routes and Emergency Planning.
- B. 1910, Subpart D, Walking-Working Surfaces.
- C. 1910, Subpart I, Personal Protective Equipment.
- D. 1910, Subpart L, Fire Protection.
- E. 1910, Subpart N, Materials Handling and Storage.
- F. Final Rule at 79 FR 56129-56188, Occupational Injury and Illness Recording and Reporting Requirements – NAICS Update and Reporting Revisions.

- G. 1904, Recording and Reporting Occupational Injuries and Illnesses.
- H. VOSH Field Operations Manual (FOM)(latest version).
- I. VOSH Directive 02-110, VOSH Enforcement Policy for New Reporting Requirements under Va. Code §40.1-51.1.D and §16VAC25-85-1904, July 1, 2017.
- J. OSHA 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.
- K. VOSH Directive 02-003 (latest version), VOSH Procedures to comply with OSHA Enforcement Exemptions and Limitations under the Federal Appropriations Act, OSHA Instruction CPL 02-00-051.

**Cancellation** None.

**Effective Date** April 15, 2024

**Expiration Date** This Directive will terminate three years from the effective date.

**Action** Directors and Managers shall ensure that policies and procedures established in this Directive are uniformly enforced and field personnel understand and comply with the requirements included in this Directive.

Gary G. Pan  
Commissioner

Distribution: Commissioner of Labor and Industry  
Assistant Commissioner  
VOSH Directors and Managers  
VOSH Compliance and Cooperative Programs Staffs  
Division of Hearing and Legal Services  
OSHA Region III and OSHA Norfolk Area Office

**I. Executive Summary**

This Instruction provides guidance to the VOSH Regional, and Field Offices when inspecting warehousing and distribution center operations, mail/postal processing and distribution centers (non-U.S. Postal Service), 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 Program Directive, 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 Program Directive and a health inspection shall be conducted if VOSH learns that heat and/or ergonomic hazards are present.

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## **II. Purpose**

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

## **III. Scope**

This Instruction applies VOSH-wide.

## **IV. Background**

### Warehousing and Distribution Center Operations, Mail/Postal Processing and Distribution Centers (non-U.S. Postal Service), 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 recently. From January 2011 to December 2021, the warehousing and distribution centers industry experienced a surge in employment nationally, 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 nationally. 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 (non-U.S. Postal Service), 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 Program Directive 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.

<b>Industry</b>	<b>NAICS Code</b>	<b>Total Recordable Cases Rates</b>	<b>Total DART Rates</b>
All Private Industry		<b>2.76</b>	<b>1.6</b>
Postal Service (Processing & Distribution Centers only)	491110	<b>4.79*</b>	<b>4.27*</b>
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 Program Directive.

NAICS CODES	ESTABLISHMENTS
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 Program Directive 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 Program Directive. Inspections in these establishments under this Program Directive shall cover the loading and storage areas, and VOSH may expand the scope of the partial inspection in accordance with procedures for doing so in the VOSH Field Operations Manual.

Table 3. High Injury Rate Retail Establishments covered under this Program Directive.

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

## V. Site Selection

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

- A. The list of industries in Table 2 (page 4) of this Program Directive 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 RO/FO 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 Program Directive 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 RO/FO will inspect establishments in the random number order as provided on the list to ensure neutrality. OSA will provide each RO/FO with access to software and a database that includes the establishments with the NAICS codes covered under this Program Directive.
- B. The list of establishments targeted within the NAICS codes in Table 3 of this Program Directive 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 RO/FO will be generated by OSA based on ITA data.

## VI. Inspection Scheduling

This Program Directive covers warehousing and distribution centers, mail processing and distribution centers (non-U.S. Postal Service), 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 Program Directive targets warehousing and distribution center operations, mail/postal processing and distribution centers (non-U.S. Postal Service), parcel delivery/courier services, and certain high injury rate retail establishments. Inspections conducted under this Program Directive 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 Program Directive, 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 RO/FO through ListGen a list of establishments from the NAICS in Table 2 within the RO/FO's geographical jurisdiction.
- Regional/Field Offices will ensure that the selection list will be handled and maintained in a secure location.

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 RO/FO with a list of these establishments within the geographical jurisdiction. Each RO/FO 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 Program Directive 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 Program Directive, 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 Program Directive. Inspections in these establishments under this Program Directive shall cover the loading and storage areas, and VOSH may expand the scope of the partial inspection in accordance with procedures for doing so in the VOSH Field Operations Manual.

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

The RO/FO can schedule inspections in the following manners:

1. If the RO/FO intends to inspect the entire Master List, it can schedule the inspections in any order. If the RO/FO uses this method, it must account (through inspections and deletions) for the entire list. The RO/FO cannot inspect off a new list until the entire previous list is completed.
2. The RO/FO can create cycles by choosing a set number of establishments from the Master List, sorted in random number order. For example, the RO/FO can select the first ten establishments on the Master List, sorted by ascending random number as a first cycle of 10



establishments. The RO/FO 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 RO/FO can inspect the next ten establishments on the randomized Master List as its second cycle. The RO/FO cannot inspect off a new cycle until the entire previous cycle is completed.

D. Deletions.

- The RO/FO must delete from the master list any retail establishments/stores that are not included on the high injury rate retail establishment list.
- The RO/FO 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.
- If a selected establishment falls within the scope of VOSH Directive 02-003, VOSH Procedures to comply with OSHA Enforcement Exemptions and Limitations under the Federal Appropriations Act, OSHA Instruction CPL 02-00-051 (latest version), the RO/FO shall comply with its requirements.
- The RO/FO must verify that any establishment that was subject to an inspection related to the hazards addressed by this Program Directive within the previous three years is deleted from the inspection list and not inspected under this Program Directive. The RO/FO must delete from the master list any facilities not likely to be engaged in any of the industries covered by this Program Directive (*i.e.*, warehousing/distribution, postal processing/distribution activities (non-U.S. Postal Service), 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 Program Directive shall be expanded to address the workplace hazards targeted by this Program Directive, 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 Program Directive 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 Program Directive, the inspections must be handled in accordance with VOSH FOM Chapter 2, Complaint and Referral Processing, Chapter 7, Fatality and Imminent Danger, and Chapter 8, Rescue Operations, Emergency Response and Public Information Policy.

- F. Follow-up Inspections. Follow-up inspections are to be conducted in accordance with the VOSH FOM, Chapter 3. Program Planning, based on available resources.

VII. **Inspection Procedures**

- A. Scope. This Program Directive covers both programmed and unprogrammed safety inspections, and all inspections will be conducted in accordance with provisions of the VOSH FOM, Chapter 5, Inspection Procedures. Complaints and referrals pertaining to establishments covered under this Program Directive should be processed in accordance with the procedures outlined VOSH FOM Chapter 2, Complaint and Referral Processing.

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

Inspections conducted under this Program Directive 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 Program Directive (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 Program Directive.

After verifying the NAICS code of the establishment, the CSHO must conduct an inspection under this Program Directive unless:

1. The site NAICS code is not listed in Table 2 of this Program Directive, 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 VOSH'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 Program Directive 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 Program Directive for Outdoor and Indoor Heat-Related Hazards (Heat Program Directive) and a health inspection shall be opened.

The Heat Program Directive and this Program Directive have multiple NAICS codes that are targeted within both respective emphasis programs. If the establishment is targeted under both the Warehousing and Distribution Program Directive and the Heat Program Directive, the safety and health inspections may be conducted concurrently under both Program Directives. See VOSH Program Directive 14-442, National Emphasis Program on Outdoor and Indoor Heat-Related Hazards.

- 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.

### **VIII. Recording in OIS**

- A. Programmed Inspections under the Warehousing and Distribution Center Operations Program Directive Only. All inspections opened from the targeting lists under this Program Directive 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 Program Directive 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 Program Directive. All unprogrammed inspections that are expanded by this Program

Directive will be coded as “WAREHOUSE23”.

- C. Other Emphasis Program Inspections with Warehousing and Distribution Center Operations Program Directive. Enforcement activities related to warehousing hazards under other Program Directives and/or LEPs, may be coded as “WAREHOUSE23” under the Secondary National Emphasis Program if the inspection is expanded per this directive.

## **IX. Outreach**

VOSH will implement a 90-day outreach program that supports the purpose of this Program Directive. During this period, the covered industries with NAICS codes in Table 2 will be offered outreach prior to undergoing inspections under this Program Directive. 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 Program Directive. 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 FOs have discretion to disseminate outreach materials to stakeholders, which may include employees, employers, professional associations, and local unions.

Small business inspected under this Program Directive should be referred to VOSH’s on-site consultation program at [VOSH Consultation Services](https://www.doli.virginia.gov) (doli.virginia.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>.