



OSHA REGIONAL INSTRUCTION

U.S. DEPARTMENT OF LABOR

Occupational Safety and Health Administration

DIRECTIVE NUMBER: BHM-CPL-04-00-000

SUBJECT: Regional Emphasis Program (REP) for Programmed Maritime Inspections

REGION: Birmingham Region

SIGNATURE DATE: July 30, 2026

EFFECTIVE DATE: October 1, 2026

ABSTRACT

- Purpose:** The purpose of this instruction is to renew a Regional Emphasis Program (REP) for programmed inspections of Maritime Industries.
- Scope:** This instruction applies to all Birmingham Region Federal Area Offices.
- References:** See [Section III.](#)
- Cancellations:** This instruction supersedes OSHA Regional Instruction BHM-CPL-04-00-000, Regional Emphasis Program (REP) for Programmed Maritime Inspections, April 22, 2025.
- State Impact:** No Impact.
- Action Offices:** This instruction applies to the Baton Rouge, Birmingham, Jackson, Little Rock, Mobile, and Nashville Federal Area Offices.
- Originating Office:** Birmingham Regional Office
- Contact:** Assistant Regional Administrator for Enforcement Programs

By and Under the Authority of

DORINDA HUGHES
Regional Administrator

Executive Summary

This instruction reissues the Regional Emphasis Program for programmed inspections of Maritime Industries engaged in shipbuilding and repair (NAICS 336611), marine cargo handling (NAICS 488320), boat building (NAICS 336612), marinas (NAICS 713930), and recreational boat repair (NAICS 811490) located on or adjacent to navigable waterways throughout the Baton Rouge, Birmingham, Mobile, Jackson, Little Rock and Nashville Area Offices.

Significant Changes

- Added Baton Rouge and Little Rock Area Offices.
- Updated the OSHA Information System statistical data.
- Updated Bureau of Labor Statistics charts and information.

Table of Contents

I. Purpose	4
II. Scope	4
III. References	4
IV. Cancellations	4
V. Expiration	4
VI. Action Offices	4
A. Responsible Office	4
B. Action Office	4
C. Information Offices	5
VII. Federal Program Change	5
VIII. Significant Changes	5
IX. Background	5
X. Procedures	6
XI. Recording in OIS	6
XII. Outreach	6
XIII. Evaluation	7
Appendix A	8
Appendix B	9

I. Purpose.

This instruction renews a Regional Emphasis Program for programmed inspections of maritime Industries within the jurisdiction of the Baton Rouge, Birmingham, Mobile, Jackson, Little Rock and Nashville Federal Area Offices as part of the OSHA region realignment.

II. Scope.

This instruction applies to all Birmingham Region Federal Area Offices.

III. References.

- A. [OSHA Instruction CPL 02-00-025, Scheduling System for Programmed Inspections](#), January 4, 1995
- B. [OSHA Instruction CPL 04-00-002, Procedures for Approval of Local Emphasis Programs \(LEPs\)](#), November 13, 2018
- C. [OSHA Instruction CPL 02-00-164, Field Operations Manual \(FOM\)](#), February 9, 2026, or current update.
- D. [OSHA Authority Over Vessels and Facilities on or Adjacent to U.S. Navigable Waters](#), November 13, 2024
- E. [Shipyard Employment “Tool Bag” Directive](#), 5/22/2019
- F. [Longshoring and Marine Terminals “Tool Shed” Directive](#), July 31, 2012

IV. Cancellations.

This instruction supersedes OSHA Regional Instruction BHM-CPL-04-00-000, Regional Emphasis Program (REP) for Programmed Maritime Inspections, April 22, 2025.

V. Expiration.

This instruction will expire five years from the effective date, unless extended.

VI. Action Offices.

- A. Responsible Office.
Birmingham Regional Office – Enforcement Programs.
- B. Action Offices.
Baton Rouge, Birmingham, Mobile, Little Rock, Jackson and Nashville Area Offices.

C. Information Offices.

The U.S. Coast Guard is the agency responsible for making any determination of whether a body of water is considered a U.S. navigable waters. The term U.S. navigable waters include U.S. inland waters (such as rivers, tributaries, lakes, bays, and sounds), as well as State waters.

The U.S. Coast Guard has issued comprehensive regulations for the working conditions of seamen on inspected vessels. Therefore, OSHA may not enforce the OSH Act (except for regulations dealing with the recording and reporting of occupational injuries and illnesses) with respect to any working conditions of seamen on inspected vessels.

VII. Federal Program Change.

None.

VIII. Significant Changes.

- A. Added the Baton Rouge and Little Rock Federal Area Offices.
- B. Updated OSHA Information System statistical data.
- C. Updated Bureau of Labor Statistics charts and information.

IX. Background.

OSHA Instruction CPL 02-00-025, Scheduling System for Programmed Inspections Section

B. 1. b. (3) Inspection Scheduling for Maritime states that the maritime industry is made up of several industrial activities and due to the unique differences among the industries, several scheduling methods are necessary. Recognizing the differences in conducting water transportation services operations in a large port, where, for example, many stevedores generally conduct longshoring operations, and on rivers and other waterways, where loading and unloading by a single employer is generally involved, water transportation services inspections may be scheduled either by port area or by employer.

Bureau of Labor Statistics (BLS) 2024 data, the DART (Days Away, Restricted or Transferred) incidence rate for Marinas was 2.9, for Ship building and repairing was 3.2, for Marine cargo handling was 1.8, compared to 1.4 for private industry. This instruction provides the authority to area offices to continue conducting inspections of these operations.

During FY25, the OSHA Action Area Offices of the Birmingham Region, conducted 28 programmed Maritime inspections with 33 Serious and 25 Other-than-Serious violations at facilities in the North American Industry Classification System (NAICS) codes covered by these operations. To better address the hazards that employees in this industry face, Birmingham Region developed this REP for the affected Action Offices.

X. Procedures.

- A. Scheduling lists shall be developed in one of the following two ways per [CPL 2-00-025](#), paragraph B.1.b(3)(c):
 - 1. List by Port Area - A list of port areas within the Area Office's jurisdiction may be prepared at the beginning of the fiscal year by the Area Director, based on geographical location, OSHA inspection history, local knowledge and experience, company schedules, and information from other sources.
 - 2. List by Employer - A list of all maritime service employers within the Area Office's jurisdiction may be prepared based on geographical location, OSHA inspection history, local knowledge and experience, company schedules, and other sources.
- B. The method of selection (for the lists) shall be determined at the beginning of each fiscal year by each Area Director, based on the type of maritime activities within the Area Office jurisdiction and on the ability to identify active employers and their worksites. The selection method shall be approved by the Regional Administrator, or designee.
- C. Deletions shall be made in accordance with CPL 02-00-025, paragraph B.1.b(3)(c)6.
- D. Health inspections shall be scheduled in accordance with CPL 02-00-025, paragraph B.1.b.(3)(c) 8.
- E. Inspections shall be conducted in accordance with CPL 02-00-164 Field Operations Manual, and the guidance of [CPL 02-00-162 Shipyard Employment "Tool Bag" Directive](#) and [CPL 02-00-154 Longshoring and Marine Terminals "Tool Shed" Directive](#).

XI. Recording in OIS.

Current instructions for completing the appropriate OSHA forms shall be applied when recording inspections under this REP.

- A. For any programmed inspection conducted under this REP, the Inspection Data section of OIS shall be coded as Programmed Planned with the Local Emphasis Program code "MARITIME".
- B. For any unprogrammed inspections conducted under this REP (*i.e.*, accidents, complaints, referrals, fatalities/catastrophes), the Inspection Data section of OIS shall be coded as Unprogrammed with the Local Emphasis Program Code "MARITIME".

XII. Outreach.

All REPS must contain an outreach component that must be ongoing throughout the effective period of the program. These outreach efforts should be coordinated with or include the consultation program for that area. The method of outreach is at the Area Directors discretion and can consist of one or more of the following components.

1. Broadcast mail-outs (Appendix A), emails, or program information
2. Stakeholder meetings
3. Targeted training sessions
4. Presentations to the affected group(s)

Before the Baton Rouge and Little Rock Area Offices initiate enforcement activities under this program, each will implement outreach programs supporting the goals of this program. The outreach efforts should occur at least three months before the initiation of inspections and continually after.

XIII. Evaluation.

An evaluation of the program will be conducted midway through and at the completion of the effective period that includes:

1. The goal of the program.
2. Data and information used to support the continuation or cancellation of the program. Data may include enforcement statistics, serious hazards identified and abated, the number of employees removed from hazards, and any impact on covered, non-inspected employers.
3. Statement and rationale of whether the program should be continued.
4. Description of any legal issues that arose which would necessitate a review by the Solicitor before renewal of the program.
5. Any other comments or recommendations, including findings, might have an impact on how the industry conducts business.
6. Data associated with outreach sessions in which this emphasis program is addressed.

Appendix A

Sample Letter

Dear Stakeholder:

The Occupational Safety and Health Administration (OSHA) has initiated a Regional Emphasis Program (REP) focusing on hazards related to maritime industries. The initiative focuses on NAICS codes 336611 (ship building and repairing), 488320 (marine cargo handling), 336612 (boat building), 713930 (marinas), and 811490 (recreational boat repair).

As a result of this, the *(Area Office Name)* Area Office will be conducting inspections of workplaces that have been identified as having operations and possible worker exposures to common hazards found in this industry. The most common hazards include falls, power industrial trucks (PIT), and working under an overhead load. We are notifying you of our intent to conduct these inspections because your company may be covered by this emphasis program.

OSHA continues to offer compliance assistance focusing on prevention of occupational injuries and illnesses. As part of this new emphasis program, compliance assistance products are readily available to assist your company in enhancing its safety and health program. You can obtain information about electrical safety, powered industrial trucks, emergency action plans, hazard communication, hearing conservation and noise, lockout/tagout, machine guarding, respiratory protection, and safety and health programs from OSHA's website at www.osha.gov. Specific information about the hazards of working in maritime operations can be obtained from OSHA's area offices. If you do not have access to the Internet, please contact our office and we will provide copies of this information to you. You may contact our office at any time for further assistance: *(insert phone number and address for the Area Office)*.

OSHA also offers a free Consultation Service under Section 21(d) of the Occupational Safety and Health Act to small employers. The 21(d) Consultation Service helps employers to identify (and correct) potential hazards at their work sites and improve their occupational safety and health management systems. This service is delivered by universities using well-trained safety and health professionals. To schedule this consultation service, please contact the 21(d) Consultation Program at:

(Insert contact information for the local Consultation Program including the Address and Telephone Number for the State Consultation Program)

Your interest in protecting your employees from safety and health hazards is appreciated.

Sincerely,

Area Director

Appendix B

Maritime Industry Resources

Resources available on the web at: www.osha.gov

Maritime Topics Page: <https://www.osha.gov/maritime>

Maritime Standards and Guidance: <https://www.osha.gov/maritime/standards>

Maritime Advisory Committee: <https://www.osha.gov/advisorycommittee/macosh>

Maritime OSHA 10 & 30 Hour Training: <https://www.osha.gov/maritime/training>

Maritime Resources and Solutions: <https://www.osha.gov/maritime/resources>

Shipyard Employment eTool: <https://www.osha.gov/etools/shipyard>

Publications on: [Longshoring](#), [Maritime Industry](#)