



OSHA INSTRUCTION

U.S. DEPARTMENT OF LABOR

Occupational Safety and Health Administration

DIRECTIVE NUMBER: CPL-03-00-026

SUBJECT: National Emphasis Program on Warehousing and Distribution Center Operations

DIRECTORATE: Office of General Industry and Agricultural Enforcement

SIGNATURE DATE: 7/6/2026

EFFECTIVE DATE: 7/31/2026

ABSTRACT

Purpose: This Instruction describes policies and procedures when inspecting warehousing and distribution center operations, mail/postal processing and distribution centers, and parcel delivery/courier services. All inspections under this National Emphasis Program (NEP) are comprehensive safety inspections.

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, heat, ergonomics and fire protection.

Scope: This Instruction applies OSHA-wide.

References: See [Section III](#).

Cancellations: This Instruction supersedes [CPL 03-00-026, National Emphasis Program on Warehousing and Distribution Center Operations](#) that took effect on July 13, 2023.

State Impact: Notice of Intent and Adoption required. See [Section VII](#).

Action Offices: OSHA National, Regional, and Area Offices, State Plans, and On-Site 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

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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, and parcel delivery/courier services. This Instruction replaces [CPL 03-00-026, National Emphasis Program on Warehousing and Distribution Center Operations](#), that took effect on July 13, 2023. Days Away, Restricted, or Transferred (DART) rates show that injury and illness rates for these industries continue to be significantly higher than the overall industry average. Under this NEP, OSHA will conduct comprehensive safety inspections and focus on workplace hazards common to these industries.

Significant Changes

- Removed coverage for High Injury Rate Retail Establishments (Table 3 in 2023 NEP).
- Removed mandatory screening requirements for ergonomic and heat hazards.
- Extended the NEP expiration date to five years from the effective date.
- Clarified AO discretion to expand inspections based upon fatalities/catastrophes, complaints, or referrals related to establishments in the NAICS codes covered under this NEP.
- Changed OIS coding to “WAREHOUSE.”

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I. Purpose.

This Instruction describes policies and procedures to identify and reduce or eliminate hazards when inspecting warehousing and distribution center operations, mail/postal processing and distribution centers, and parcel delivery/courier services covered by this NEP.

II. Scope.

This Instruction applies OSHA-wide.

III. References.

- A. [Occupational Injury and Illness Recording and Reporting Requirements – NAICS Update and Reporting Revisions](#), September 18, 2014, Final Rule at 79 FR 56129-56188.
- 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. [ADM 03-01-005, OSHA Compliance Records](#), August 3, 1998.
- K. [Revised Interim Procedures for Reporting Requirements under 29 C.F.R. 1904.39](#), Memorandum dated March 4, 2016.
- L. [Update to Enforcement Procedures for Failure to Submit Electronic Illness and Injury Records under 29 CFR § 1904.41\(a\)\(1\) and \(a\)\(2\)](#), Memorandum dated April 16, 2024 (or subsequent guidance).
- M. [Establishment-Targeting Lists for Emphasis Programs](#), Memorandum dated November 12, 2014.
- N. [CPL 02-00-170, Enforcement Exemptions and Limitations under the Appropriations Act](#), July 18, 2024.
- O. [CPL 02-00-172, Part 1904 Recordkeeping Policies and Procedures Directive](#), January 13, 2025.
- P. [CPL 02-01-067, Site-Specific Targeting \(SST\)](#), May 20, 2025.

IV. Expiration Date.

This Instruction will expire five years from the effective date.

V. Cancellations.

This Instruction supersedes [CPL 03-00-026, National Emphasis Program on Warehousing](#)

[and Distribution Center Operations](#) that took effect on July 13, 2023.

VI. Action Offices.

A. Responsible Office.

Directorate of Enforcement Programs (DEP), Office of General Industry and Agricultural Enforcement.

B. Action Office.

OSHA Regional and Area Offices, State Plan and OSHA On-Site Consultation Programs.

C. Information Offices.

OSHA National Office Directorates.

VII. Federal Program Change.

Notice of Intent Required, Adoption Required. This Instruction describes a federal program change that updates the NEP to identify and eliminate or reduce exposures in warehousing and distribution centers. State Plans are strongly encouraged, but are not required, to adopt this updated Instruction.

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 summarize the State Plan responses to this directive on its [State Plan Adoption webpage](#).

OSHA's Office of Statistical Analysis (OSA) will work with the State Plans to provide the data as requested to develop targeting lists in accordance with the instructions in [Section X](#). OSHA will make the list(s) of establishments available to the State Plans. See coding instructions for the OSHA Information System (OIS) in [Section XIII](#).

VIII. Significant Changes.

A. Removed coverage for High Injury Rate Retail Establishments (Table 3 in 2023 NEP).

B. Removed mandatory screening for ergonomic and heat hazards.

- C. Extended the expiration date of the NEP to five years from the effective date.
- D. Clarified Area Office discretion to expand inspections based upon fatalities/catastrophes, complaints, or referrals related to establishments in the NAICS codes covered under this NEP.
- E. Changed OIS coding to “WAREHOUSE.”

IX. 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. To address these hazards, OSHA initiated the National Emphasis Program on Warehousing and Distribution Center Operations on July 13, 2023. Within the first 18 months of the NEP’s inception, OSHA identified more than 1,700 violations and removed approximately 37,410 workers from hazards.

The warehousing and storage industry experienced a more than two-fold increase in employment over the ten-year period of December 2015 to December 2025. Employment increased respectively from 882,100 employed to a total of 1,836,200 employed (seasonally adjusted)¹. The warehousing and storage industry has continued to experience occupational injuries and illness rates greater than the national average for all private industries. From 2020 through 2024, 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 greater than the baseline private general industry rates.

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.

¹ Calculated from Bureau of Labor Statistics (BLS) data.

²Table 1. 2020-2024 five-year average incidence rates of nonfatal occupational injuries and illnesses by industry and case types.

Industry	NAICS Code	Average Recordable Case Rates	Average DART Rates
All Private Industry	N/A	2.6	1.6
Postal Service (Processing & Distribution Centers only)	491110 ³	5.3	4.9
Couriers and Express Delivery Services	492110	8.6	6.9
Local Messengers and Local Delivery	492210	6.1	4.9
General Warehousing & Storage	493110	5.2	4.4
Refrigerated Warehousing and Storage	493120	4.6	3.8
Farm Product Warehousing and Storage	493130	3.2	2.6
Other Warehousing and Storage	493190	3.1	2.5

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.

Industry	NAICS CODE
Postal Service (Processing & Distribution Centers only)	491110
Couriers and Express Delivery Services	492110
Local Messengers and Local Delivery	492210
General Warehousing and Storage	493110
Refrigerated Warehousing and Storage	493120
Farm Product Warehousing and Storage	493130
Other Warehousing and Storage	493190

² Rates calculated from BLS Data, 2020-2024.

³ Figures based off OSHA Injury Tracking Application Data (ITA).

X. Site Selections.

OSHA will follow current procedures to use neutral and objective selection criteria when selecting establishments for programmed inspections under this NEP. The Office of Statistical Analysis (OSA) will use the ListGen application to generate a Master List of establishments within the NAICS codes in [Table 2](#) of this NEP for each Area Office (AO). ListGen assigns a random number to each establishment on the Master List and sorts the list in random number order. OSA will provide each AO with access to ListGen and the database that includes the establishments within the NAICS codes covered under this NEP.

XI. Inspection Scheduling.

A. Records Management.

The Regional Office (RO) and Area Office (AO) must follow the procedures in [ADM 03-01-005, OSHA Compliance Records](#) and the memorandum [Establishment-Targeting Lists for Emphasis Programs](#), dated November 12, 2014, to handle and maintain records when scheduling inspections from the Master List.

B. Scheduling Methods.

The AO can schedule inspections by using the Master List as is or establishing a cycle. A "cycle" is a subset of establishments from the Master List (e.g., 10 establishments selected from the Master List of 100 establishments). OSHA permits AOs to establish a cycle from the Master List. The AO can inspect the establishments within a cycle in any order to complete the cycle. This process allows AOs to allocate inspection resources efficiently. The AO may generate cycles all at once or as necessary using the methods below. Each cycle need not be the same size. The AO will schedule inspections until this NEP is cancelled or until all establishments on the Master List have been assigned to a cycle.

The AO can schedule inspections as follows:

1. If the AO intends to complete the entire Master List, it can schedule the inspections in any order. For example, the AO may schedule inspections based on the establishments' geographic location. If the AO uses this method, it must complete the entire list through inspections and deletions as appropriate (see [XI.D.](#)). The AO cannot inspect off a new Master List until it completes the existing Master List.
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. 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 before 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.

- C. Lists generated under the prior NEP.
AOs are not required to complete unfinished cycles from the previous NEP, [CPL 03-00-026](#), according to [CPL 02-00-025 B.1.b.\(1\)\(d\)](#), because the previous NEP has been superseded.
- D. Deletions.
1. The AO must delete from the Master List any establishment that is out of business and document the basis for such determinations. This documentation should be kept as an attachment to the target list.
 2. The AO must assure that selected establishments do not fall within the scope of the current Appropriations Act ([CPL 02-00-170, Enforcement Exemptions and Limitations under the Appropriations Act](#)).
 3. The AO must delete from the Master List any establishment that had a comprehensive inspection related to the hazards addressed by this NEP within the previous three years.
 4. The AO must delete from the Master List any establishment that is not likely to be engaged in the industries covered by this NEP (see [XII. A. Scope](#)) and document the basis for such determinations.
 5. The AO must delete from the Master List any post office location that is not a processing and distribution center.
- E. Unprogrammed Inspections.
The AO may expand inspections based upon fatalities/catastrophes, complaints, or referrals related to establishments in the NAICS codes covered under this NEP to address common workplace hazards in the warehouse and distribution industry, including but not limited to, powered industrial vehicles operations, material handling/storage, walking-working surfaces, means of egress, heat, ergonomics, and fire protection. In addition to following the guidelines in this NEP, the AO must follow the guidance in [FOM Chapter 9, Complaint and Referral Processing](#), and [Chapter 11, Imminent Danger, Fatality, Catastrophe, and Emergency Response](#) when prioritizing inspections.
- F. Programmed Inspection.
Inspections conducted under this NEP may be combined and conducted concurrently with other Programmed inspections when the establishment is on other lists (e.g., other emphasis programs and site-specific targeting). Programmed and other unprogrammed (e.g. complaints, referrals, and FAT/CAT) inspections may be expanded, where there is evidence that violative conditions may be found in the establishment (e.g., injuries or illnesses recorded in both

OSHA Forms 300 and 301, employee statement, or “plain view” observations), if the establishment’s NAICS code is simultaneously covered by this NEP ([Table 2](#)), and the establishment is not exempt under the [Appropriations Act](#). Such inspections shall be handled in accordance with the procedures outlined in the [FOM, Chapter 9](#).

G. Follow-up Inspections.

The AO will follow the guidance in [FOM, Chapter 3, Section XII.K. Follow-up and Monitoring Inspections](#), to conduct follow-up inspections.

XII. Inspection Procedures.

A. Scope.

This NEP covers both programmed and unprogrammed safety inspections. CSHOs may only inspect an establishment under the NEP if the NAICS code is listed in [Table 2](#). Inspections under this NEP do not include postal or package transportation/delivery to residences and businesses. The CSHO must conduct inspections in accordance with all applicable provisions of the FOM, including [Chapter 3, Inspection Procedures](#). The AO will follow the procedures in [FOM Chapter 9](#) to process complaints and referrals pertaining to establishments covered under this NEP.

B. Opening Conference.

The CSHO will verify the NAICS code of the establishment and the employer’s total number of employees. After confirming that the establishment is subject to inspection under this NEP (see 1-3 below), the CSHO will also verify the location in the workplace where the employer conducts warehousing activities, distribution center activities, or both. If the AO discovers the establishment location has changed or is not correct, but the NAICS code, personnel, and the operation is substantially similar, the CSHO may proceed with the inspection. In addition, the CSHO will review OSHA 300 logs, 300A summaries, and OSHA 301 incident reports for the current and previous three calendar years to identify recorded injuries and illnesses associated with the hazards covered by this NEP.

The CSHO must not conduct an inspection under this NEP if:

1. The establishment’s NAICS code is not listed in [Table 2](#) of this NEP.
2. The establishment had a comprehensive safety inspection related to the hazards addressed by this NEP within the previous three years.
3. The establishment is a post office location that is not a processing and distribution center.

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

C. Potential ITA Non-Responders.

If the CSHO finds that an employer failed to submit ITA records when conducting an inspection under this NEP, the CSHO must follow OSHA guidance in the memorandum [Update to Enforcement Procedures for Failure to Submit Electronic Illness and Injury Records under 29 CFR § 1904.41\(a\)\(1\) and \(a\)\(2\) dated April 16, 2024](#) (or subsequent guidance) to cite the employer for a violation.

D. Training.

The nature of these inspections and the related hazards may vary. CSHOs conducting inspections under this NEP must have training and/or knowledge to address the related hazards.

XIII. Recording in OIS.

- A. Programmed Inspections under the Warehousing and Distribution Center Operations NEP Only: Code all inspections opened from the targeting list under this NEP as initiating type Programmed Planned, Comprehensive, select “WAREHOUSE” as the National Emphasis Program and the Primary Emphasis Program and code the inspection as a “Safety” inspection under the Inspection category.

Additionally, code inspections opened under the targeting list that are “No Inspection” with the reason for not conducting the inspection (e.g., number of employees less than 10).

Note: If an AO is completing an inspection under the previous NEP, [CPL 03-00-026](#), the inspection should still be coded “WAREHOUSE23”. All new inspections open under the current NEP should be coded “WAREHOUSE”.

- B. Unprogrammed Inspections Combined with Warehousing and Distribution Center Operations NEP: Code all unprogrammed inspections that are expanded by this NEP as “WAREHOUSE.”
- C. Other Emphasis Program Inspections Combined with Warehousing and Distribution Center Operations NEP: Inspections conducted under another NEP, REP, or LEP that are expanded to a Warehouse and Distribution Center NEP inspection should be coded as “WAREHOUSE” under the “National Emphasis Program” section (refer to [XII.A.](#)).

Note: Do not expand unprogrammed inspections and do not code “WAREHOUSE”, for any warehousing and distribution operation inspections in establishments whose NAICS codes are not listed in [Table 2](#).

XIV. Outreach.

OSHA’s Regional and Area Offices (ROs and AOs) may continue to provide outreach and compliance assistance pursuant to this NEP’s goal of promoting workplace hazard

identification and elimination in the industry sectors listed in [Table 2](#). Letters and news releases to local and national news organizations and trade magazines can assist with disseminating information about this NEP. ROs and AOs should also conduct outreach to employers, trade and professional associations, labor unions and other impacted stakeholders, e.g., via meetings, trainings, educational presentations, technical assistance, and other activities, as appropriate. In addition, ROs and AOs should disseminate outreach materials and resources to agency stakeholders, including OSHA's cooperative program participants, that can help to expand the reach of the agency's outreach.

In particular, small to medium-sized businesses that may be inspected under this NEP should be made aware of OSHA's resources for small businesses, including the [On-Site Consultation Program](#).

Additional resources and reference materials, including related topics, are available on [OSHA's Warehousing Safety and Health Topics Page](#).

XV. Program Review.

To assess the effectiveness of this NEP, DEP will review outcomes within 4 years of issuance, 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 exposed to a hazard before the hazard was abated.
3. Number of hazards abated.
4. Violation statistics.
5. Indices related to measures in the DOL Strategic Plan, the OSHA Agency Management Plan, or both.