



OSHA REGIONAL INSTRUCTION

U.S. DEPARTMENT OF LABOR

Occupational Safety and Health Administration

DIRECTIVE NUMBER: SFO-CPL-05-00-002

SUBJECT: Regional Emphasis Program for Longshoring

REGION: San Francisco

SIGNATURE DATE: September 22, 2025

EFFECTIVE DATE: October 1, 2025

ABSTRACT

Purpose: This renews and updates a Regional Emphasis Program (REP) for programmed inspections of longshoring. This instruction covers all relevant establishments under the jurisdiction of federal OSHA's San Francisco Region.

Scope: This instruction applies to areas of federal enforcement in the San Francisco Region.

References: See Paragraph III

Cancellations: This instruction cancels Region IX Enforcement Programs Notice CPL 04-09-2408, dated October 1, 2018, and Region X Notice 21-10 (CPL 04), dated December 31, 2018.

State Impact: No Impact

Action Offices: All San Francisco Regional and Area Offices

Originating Office: San Francisco Region Enforcement Programs

Contact: Paul Leary, Assistant Regional Administrator Enforcement Programs

By and Under the Authority of

James D. Wulff
Regional Administrator

Executive Summary

The purpose and intent of this instruction is to provide an inspection scheduling system to cover high-hazard activities within the context of current laws and OSHA policy. Safety and health programmed inspections in longshoring are to be scheduled using these instructions.

Longshoring is a highly specialized and hazardous activity, covered by standards in 29 CFR 1917 and 1918. The San Francisco Region has jurisdiction over longshore employment for stevedoring companies in California (jurisdiction in California is shared with Cal/OSHA), Hawaii, American Samoa, Guam, CNMI, Washington, Oregon, Idaho, and Alaska.

For 2023, the fatality injury rate (fatal occupational injuries per 100,000 full-time workers) was 13.6 for transportation and material moving, which includes longshoring; the fatal injury rate for all private industry was 3.5.

This instruction renews the scheduling system currently in use in the San Francisco Region.

Significant Changes

This directive combines existing Regional Emphasis Programs in the former Region 9 and the former Region 10 for use in the San Francisco Region.



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I. Purpose

This instruction renews and updates the policies and procedures to be followed when scheduling and conducting programmed safety and health inspections in longshoring. The intent of this instruction is to reduce employee exposure to hazardous conditions and to prevent injuries, illnesses and fatalities in this high-hazard industry.

II. Scope

This instruction applies to all federal OSHA Enforcement Offices located in the San Francisco Region for inspections of longshoring sites.

III. References

- A. OSHA Instruction CPL 02-00-164, April 14, 2020, Field Operations Manual.
- B. OSHA Instruction CPL 02-00-025, Scheduling System for Programmed Inspections, January 4, 1995.
- C. OSHA Instruction CPL 02-00-051, Enforcement Exemptions and Limitations under the Appropriations Act (Appendix A updated annually)
- D. OSHA Instruction CPL 04-00-002, Procedures for Approval of Local Emphasis Programs, effective November 13, 2018.
- E. Memorandum dated December 3, 2014, on Procedures for Local and Regional Emphasis Programs.
- F. Memorandum dated November 12, 2014, on Establishment-Targeting Lists for Emphasis Programs.

IV. Cancellations

- A. Region IX Enforcement Programs Notice CPL 04-09-2408, dated October 1, 2018
- B. Region X Notice 21-10 (CPL 04), dated December 31, 2018.

V. Action Offices

- A. **Responsible Office:** San Francisco Regional Office
- B. **Action Office:** All San Francisco Region Area Offices

VI. Expiration

This REP will expire no later than five years from the date of implementation unless renewed.

VII. Background

It is OSHA policy that programmed inspections be conducted primarily in high hazard sectors of employment. For purposes of scheduling programmed inspections, transportation and material moving, which includes longshoring, is considered a high-hazard industry. Longshoring is a highly specialized and hazardous activity, covered by standards in 29 CFR 1917 and 1918. For 2023, the fatality injury rate (fatal occupational injuries per 100,000 full-time workers) was 13.6 for transportation and material moving, which includes longshoring; the fatal injury rate for all private industry was 3.5.

VIII. Jurisdiction

- A. In most cases, the U.S. Coast Guard has jurisdiction over ships' crew members. If a Compliance Safety and Health Officer (CSHO) encounters any situation involving the safety or health of ships' crew members, a referral may be made to the Coast Guard. CSHOs should consult with Regional Enforcement Programs and the Regional Solicitor to determine if OSHA has any jurisdiction.
- B. Federal OSHA does not have jurisdiction over employees of political subdivisions, including Port Authorities.
- C. Alaska: Federal OSHA has jurisdiction over longshoring and marine terminal operations on and off the water, however there are specific exceptions. Federal OSHA does NOT have jurisdiction over the loading or unloading of coal or other minerals into or out of barges or vessels at mine-owned or mine-operated piers and docks where jurisdiction is under the Mine Safety and Health Administration (MSHA). One exception is at the Red Dog Mine where Federal OSHA has jurisdiction over longshoring and marine terminal operations, even though it involves mineral transfer operations typically under MSHA.
- D. California: Federal OSHA has jurisdiction over shipboard activity; Federal OSHA does NOT have jurisdiction over all marine terminals. Marine Terminals are covered by Cal/OSHA, except for the Naval Base at Port Hueneme and the Coast Guard Base Terminal Island (Los Angeles/Long Beach), where Federal Employees conduct longshoring work.
- E. Hawaii: Federal OSHA has jurisdiction over all marine terminal and shipboard longshoring operations.
- F. Idaho: Federal OSHA has jurisdiction over all longshoring and marine terminal operations on and off the water, except loading/unloading coal or other minerals into/out of barges or vessels at mine piers and docks.
- G. Pacific Territories: Federal OSHA has jurisdiction over marine terminal and shipboard longshoring activities in Guam, the Commonwealth of the Northern Mariana Islands, and American Samoa. However, in Guam, Federal OSHA does not have jurisdiction over local port authority personnel employed by the Government of Guam.
- H. Washington: Federal OSHA has jurisdiction over employers with operations aboard vessels afloat and access to the vessels, including container ships, cargo barges, and boom boats except the loading or unloading coal or other minerals from barges or vessels at mine piers and docks.

IX. Procedures

- A. The Area Offices will schedule longshoring inspections by random selection of zones, using the procedures outlined in the Appendix. Based on the random list of zones, inspections of employers within each zone will be scheduled as follows: The order of inspections of employers within a zone is at the discretion of the compliance officer. Appendix B contains a list of zones. All Area Offices are

encouraged to coordinate with EP to update this list if they identify new sites or employers; sites that have moved; or sites that are no longer operational.

- B. Where federal OSHA has jurisdiction over marine terminals, every active terminal within a zone will be inspected.
- C. Employers may be subject to multiple inspections in a single zone within a quarter if they are working at multiple ships or terminals when that zone is randomly selected for inspection. Each ship will be counted as a separate worksite and a separate inspection; where federal OSHA has jurisdiction over marine terminals, each terminal will be counted as a separate worksite and separate inspection.
- D. Employers will be scheduled for programmed inspections within the same zone no more than twice a year (once every other quarter).
- E. If a compliance officer observes imminent danger or serious hazards at an employer's site which is not scheduled for inspection, the CSHO may make a self-referral and conduct an inspection. This is not a programmed inspection, and as such is not covered by the requirement related to inspections in consecutive quarters in paragraph D above.
- F. Active loading or unloading of a vessel or barge will have priority over Marine Terminal inspections where no longshoring activity is active.
- G. Complaints, reports of imminent danger, and unresolved complaints or referral inquiries will be scheduled for on-site inspection as appropriate, in accordance with the current FOM. All other complaints and referrals will be handled by inquiry in accordance with policy.
- H. Whenever possible, CSHOs will verify abatement immediately, during the on-site inspection. On-site abatement is particularly important in longshoring inspections, where conditions can change quickly. CSHOs must make every attempt possible to compel immediate abatement, before inspections are completed. It is critical that compliance officers verify abatement before inspected ships leave port. A ship leaving port is not satisfactory abatement.
- I. Employer and employee involvement is expected on inspections. If an employee representative cannot accompany OSHA personnel during an inspection, compliance officers should thoroughly document in the case file the steps taken to request and encourage such involvement, and the reasons for continuing the inspection without the participation of the employee representative. If necessary, the compliance officer may delay the opening of the inspection for a reasonable period, until an employee representative becomes available.
- J. Programmed inspections will not be scheduled during a work stoppage, including strikes or lockouts. In areas where Cal/OSHA has jurisdiction in marine terminals (all zones in California outside of the federal jurisdiction area of Port Hueneme), the Area Director may need to contact Cal/OSHA to coordinate enforcement activity.

X. Program Evaluation

- A. At the midpoint of the effective period of this REP (two and a half years from the implementation date) and at the end of the effective period, evaluation reports will be completed that shall include the following elements:
 - a. Outline of the Program Goals.
 - b. A determination of the program's effectiveness meeting its goal.
 - c. Data to support the achievement of the goal, including enforcement statistics as required in CPL 04-00-002, Procedures for the Approval of Local Emphasis Programs.
 - d. Statement whether the program should be continued, accompanied by a brief rationale.
 - e. Description of any legal issues requiring review by the Solicitor before continuing the program.
 - f. Any other comments or recommendations, including findings which might have an impact on how OSHA or the industry operates.

- B. This evaluation shall be submitted to the Regional Administrator for review, at which time a decision will be made to continue, amend, renew or discontinue the REP.

XI. Coding

- A. All inspections scheduled under this REP shall be marked with the primary emphasis code LONGSHORESFO.

- B. Unprogrammed inspections or inspections covered under other scheduling systems which also cover the industries targeted by this REP shall have LONGSHORESFO entered as a non-primary emphasis code.

- C. Any other applicable REP, LEP or NEP code may be entered as a non-primary emphasis code.

- D. All other coding should be in accordance with relevant instructions and directives.

XII. Outreach

The Assistant Regional Administrator for Cooperative and State Programs and the Assistant Regional Administrator for Enforcement Programs will ensure that Area Directors, and all Outreach staff are familiar with this directive and actively promote the REP when conducting outreach. Hazards, work practices, and machinery associated with this industry and covered by this REP will be pointed out and discussed during outreach sessions and meetings. Handouts and publications that address these hazards which are already developed and available, will be provided at outreach sessions and meetings. A

copy of this REP will be provided to interested parties upon request.

Appendix A

Procedures for Scheduling Inspections

I. Procedures for Scheduling Inspections:

- A.** The Area Office will maintain a master list of zones eligible for inspection under this REP. Due to the vast geographical locations involved, zones may be subdivided into geographical areas for scheduling purposes.
- B.** At the beginning of each fiscal year the Area Office shall create a randomly numbered list of all zones on the master list. Sites shall be randomly ordered using the RANDBETWEEN function in Excel or an equivalent randomization tool. Area Offices may also send their master list to EP for randomization. All steps in the randomization process must be documented, and this documentation should be maintained and filed with the master list, cycles, reasons for deferrals, and related information.
- C.** Additions may be made to the master list, based on local knowledge or other factors, including OSHA inspection history and annual OIS searches for zones which have been inspected for unprogrammed activity but were not previously on the list. These sites should be added to the master list for the following year.
- D.** The master list, including all additions and deletions, the randomized list, and the scheduling cycles created for this REP, shall be filed electronically on the regional shared drive or the regional SharePoint site and retained for three years. Area Offices will coordinate with Enforcement Programs (EP) to ensure all documentation is filed at least annually.
- E.** The Area Office will create scheduling cycles by selecting several zones from the randomized master list. All scheduling cycles shall be filed electronically on the regional shared drive.
 - a.** Zones selected in a cycle can be inspected in any order, but all zones in a cycle must be completed before another cycle is created. Area Offices should consider programming goals and available resources when setting the size of a cycle.
 - b.** New cycles will be selected as required by the Area Office, upon completion of the previous cycle, but at least once per fiscal year. An uncompleted cycle may be carried over into the next fiscal year, but the Area Office should adjust the number selected for subsequent cycles based upon available resources.

- c. Selected zones may be deferred to the next cycle if the Zone has been subject to a comprehensive programmed inspection (under this or any REP) within the previous 12 months, or if the process to be inspected is not active. All deferrals must be documented. Additional criteria for deferral include:
- Appropriate equipment or trained personnel are not available to conduct the inspection.
 - An establishment is the last remaining establishment in a cycle, the inspection would require travel more than 50 miles, and it cannot be combined with other inspection activities.
 - The establishment was cited as the result of a previous comprehensive inspection, and the final abatement date has not yet passed.
 - The establishment has a matter pending before the Review Commission.

- F. If all zones on the master list are to be inspected during the fiscal year, the zones may be inspected in any order. If an Area Office cannot complete all inspections on the master list within a fiscal year, the Area Office will complete the list as soon as possible in the first quarter of the next fiscal year and shall develop and follow scheduling cycles for the remainder of that year and in subsequent years.

II. Deletions From Master List:

- A. Establishments shall be deleted from the master list if, during an inspection, it is determined that the site no longer falls within the parameters of the REP.
- B. All additions and deletions must be documented.

**Appendix B
List of Zones**

California		
Zone 1	Zone 5	Zone 9
Benicia Crockett Stockton	Richmond	Long Beach
Zone 2	Zone 6	Zone 10
Eureka	Sacramento	Los Angeles
Zone 3	Zone 7	Zone 11
Oakland Alameda	San Francisco	San Diego
Zone 4	Zone 8	Zone 12
Redwood City	Terminal Island	Port Hueneme

Hawaii		
Zone 1	Zone 4	Zone 7
Hawaii (Big Island) Hilo Harbor, Kawaihae Harbor	CNMI Saipan	Oahu: Honolulu Barbers Point Kewalo Basin Marine Corps JBPHH Port
Zone 2	Zone 5	
Kauai: Nawiliwili Harbor Lanai: Kaunapau Harbor	CNMI Tinian	
Zone 3	Zone 6	
Mauai: Kahului Harbor Molokai: Kaunakakai Harbor	CNMI Rota	

Alaska

Zone 1

Craig
Gustavus
Haines
Juneau
Ketchikan
Mekhlakatla
Petersberg
Sitka
Skagway
Thorne Bay
Wrangell

Zone 4

Kodiak

Zone 7

Barrow

Zone 2

Anchorage
Homer
Nikisi
Seward
Whittier

Zone 5

Adak
Akutan
Dutch Harbor
Sand Point

Zone 8

Nenana

Zone 3

Cordova
Valdez
Yakutat

Zone 6

Bethel
Dillingham
Emmonak
Kotzebue
Naknek
Nome
Red Dog Mine
Unalakleet

Washington	
Zone 1	Zone 4
Anacortes	Olympia
Bellingham	
Everett	
Friday Harbor	
Port Townsend	
Zone 2	Zone 5
Seattle	Pasco
Tacoma	Walla Walla
Zone 3	Zone 6
Bremerton	Aberdeen-
Brownsville	Hoquiam
Kingston	Grays Harbor
Port Angeles	Ilwaco
	Neah Bay
	Peninsula
	Raymond

Oregon	
Zone 1	Zone 3
Columbia City	Arlington
Kalama	Biggs
Longview	Boardman
Portland	Irrigon
Rainier	Klickitat
St. Helens	Lewiston (Idaho)
Vancouver	The Dalles
	Umatilla
Zone 2	Zone 4
Bay City	Astoria
Brookings	Garibaldi
Charleston	Newport
Coos Bay	Warrenton
Gold Beach	
North Bend	
Port Orford	
Winchester Bay	

Appendix B