



ILA-USMX JOINT SAFETY COMMITTEE

OSH Circular 2016-03 (07 April 2016)

A Little About OSHA Inspections

Examining the publicly-accessible inspection data that OSHA maintains at its website, here's an empirical snapshot of the agency's **Calendar Year 2015** performance within the U.S. marine cargo handling sector:

Total number of inspections recorded:	116
Total number of inspections with citations issued:	67
Total number of alleged violations of OSHA standards:	165
Total number of "Serious" alleged violations:	55
Total number of "Other Than Serious" alleged violations:	88
Total unadjusted [proposed] civil penalties:	\$320,291
Total adjusted [collected] civil penalties:	\$224,019

Inspections By State/Territory

Alaska:	13	Kentucky:	14	Tennessee:	17
Arkansas:	01	Louisiana:	01	Texas:	01
American Samoa:	02	Maryland:	03	Virginia:	05
California:	09	Minnesota:	01	Washington:	10
Florida:	10	New Jersey:	10	West Virginia:	02
Georgia:	01	New York:	02		
Hawaii:	05	Oregon:	06		
Indiana:	01	Pennsylvania:	03		
Illinois:	01	South Carolina:	03		

In reviewing the data, it's fairly apparent that OSHA has, in **CY 2015**, spread itself fairly thin in relation to its waterfront presence. Furthermore, while we can (and do) rely upon OSHA regulations as a viable benchmark, we should not, as an industry, become reliant upon OSHA to serve as a principal player in our efforts to create and maintain safe workplaces. That is so, with good reason.

While the ILA~USMX Joint Safety Committee clearly understands that workers have a right to file complaints with OSHA about workplace safety and health conditions, all things considered we believe in the principle of keeping our own house in order whenever possible.

Consequently, we urge all industry participants to utilize local resources at your disposal in resolving any perceived workplace safety shortcomings. Work through your stewards and managers. *Clearly document your concerns.* If that process is disappointing, have the issue raised up to your local port's labor/management joint safety committee. Most of them meet at least quarterly. In the event that a local port joint safety committee cannot resolve the issue, the ILA~USMX Joint Safety Committee is empowered to act in a fair, equitable and responsible manner in curing any impasses.

Working Together For The Benefit Of All

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