



Safety Bulletin

Issue: 05 - 2017

September 2017

Update on OSHA’s Electronic Recordkeeping Rule

OSHA announced on June 27 its [proposal](#) to delay the initial reporting deadline from July 01 to December 01. In the same notice, OSHA stated it intends to issue a separate proposal to reconsider, revise, or remove other provisions of the prior final rule. OSHA will seek comment on those provisions in that separate proposal.

Employers can delay filing until the December 01, 2017 deadline.

It is currently unclear if OSHA’s ongoing review of the electronic submission rule will result in a decision to cancel portions of the reporting requirement or to void the entire regulation. In addition, several lawsuits are currently challenging the final rule. As such, employers are advised to wait and see and not to submit data at this time.

The Injury Tracking Application (ITA) is accessible from the [ITA launch page](#) for employers to stay current on the proposal.

PMA will continue to monitor the rulemaking and will advise members on changes as the deadline approaches.

The federal OSHA docket on *Improve Tracking of Workplace Injuries and Illnesses* can be found here. [[Docket ID: OSHA-2013-0023](#)]

Review of the Regulation

The OSHA final rule, [Improve Tracking of Workplace Injuries and Illness](#), was published in May 2016. Employers had a phased in compliance deadline for the electronic submission of recordkeeping forms. For 2017, employers with establishments with 250 or more employees and establishments with less than 250 employees but 20 or more in certain high-risk industries were required to electronically submit their 2016 Form 300A by July 1, 2017 [*Now delayed to December 01*].

Employers are advised that marine cargo handling operations are included in the OSHA establishment list for certain high risk industries and would be subject to the regulation. NAICS 488320—Support Activities for Water Transportation.

OSHA intends to use this data to create a public searchable website that would contain your companies’ injury and illness records that could be used by the general public.

Coast Training Department Update

PMA continues to work a number of initiatives to improve and update our longshore training programs:

Heat Illness Prevention

Safe Vehicle Operations

Working Safely Around Vehicles

Working at Heights

Breakbulk Safety

Log Safety

These PMA training initiatives are being designed to both reduce accidents and increase proficiency.

PACIFIC MARITIME ASSOCIATION

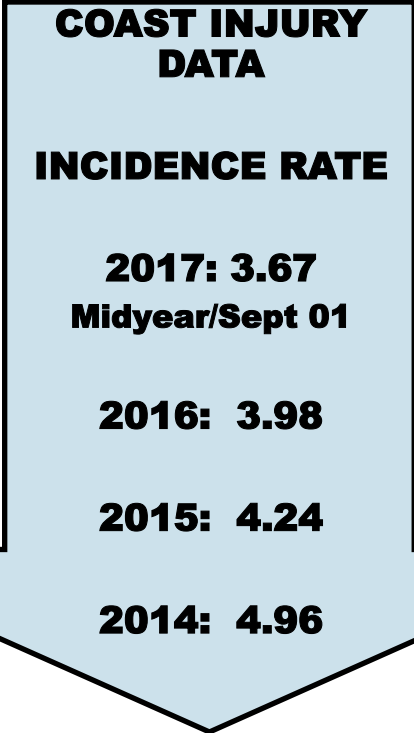
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On The Radar

Coast PCMSC Meeting
October 3 - 4
Portland, Oregon

Employers are encouraged to submit agenda topics to PMA

What is an Incidence Rate?

Incidence rates can be used to show the relative level of injuries and illnesses among different employers. Because a common base and a specific period of time are involved, these rates can determine progress in reducing work-related injuries.

An incidence rate of injuries can be calculated from the following formula:

$$\text{Number of lost time injuries and illness} \times 200,000 / \text{Employee hours worked}$$

The 200,000 figure in the formula represents the number of hours 100 employees working 40 hours per week, 50 weeks per year should work, and provides the standard base for calculating incidence rate for an entire year.

Save the Date

2018 Area Award Banquet Schedule

March 05 - Northern California
March 07 - Portland
March 13 - Washington
March 15 - Southern California