

HILL AND KNOWLTON, INC.

Environmental Health Unit Memorandum

June 21, 1971

Labor Department Launching Campaigns to Prepare Industry
for Nationwide Occupational Safety and Health Drive

Washington -- The Labor Department's new Occupational Safety and Health Administration is alerting some 4.1 million businesses that they'd better get ready to comply with the stringent terms of the new Williams-Steiger Occupational Safety and Health Act.

The effective enforcement date for most affected industries and businesses to live up to the terms of this act will be August 27.

That's 90 days after the publication in the Federal Register for May 29 of 246 pages of three columns each of fine print that set forth the safety and health standards which OSHA is charged with enforcing.

Most of these standards at present are those already effecting concerns that operate under the Construction Safety Act, the Maritime Safety Act or the Walsh-Healy action for Federal contractors. As of August 27, these standards will apply to all covered businesses and some 57 million or more workers.

OSHA officials headed by Assistant Labor Secretary George C. Guenther initiated a trade association cooperative effort Friday, June 18 with a briefing session for some 300 trade association executives or their representatives at Washington's Hilton Hotel.

Much of the discussion related to the terms of the law and the regulations, but the pressure was put on for associations to launch major activities to help their companies achieve compliance and improve their safety and health records.

Relating to the law, here are some of the points developed out of the session:

1. Operating under direction from OSHA in Washington will be 10 regional offices in Boston, New York, Philadelphia, Atlanta, Chicago, Dallas, Kansas City, Denver, San Francisco and Seattle. Under them will be 47 area offices to handle local inspections and compliance procedures.
2. It was brought out during discussion that OSHA is signing agreements with most states (at last count, 46 states and the District of Columbia) to continue to run enforcement and compliance under their own laws, while OSHA is also setting up its own program. Secretary Guenther, in response to a question conceded that there would be two systems of compliance and enforcement, but said he hoped there would be coordination and cooperation between state officials and OSHA to reduce duplication and overlap.

3. OSHA is now revising its regulation for reporting and record keeping, which requires recording any injuries or health problems that, in effect, call for anything more than a little first aid. It is proposed that these be kept on a calendar year basis rather than a fiscal year as originally proposed. These should be in the hands of employers sometime during July, and may be published in the Federal Register in a matter of weeks.

4. It is recognized that for many small businesses especially, some of the requirements will be highly costly (and perhaps unnecessary) and will be non-revenue producing. This is such an issue that a special spot on the program was given to a representative of the Small Business Administration which is trying to develop a special loan program for Safety and Health expenditures for small businesses trying to comply.

From the briefing session:

1. A list of suggestions about what trade associations could do was given out at the meeting and several others were made orally.
2. Representatives of so-called target industries -- the first ones to get priority enforcement and compliance attentions because of their "most hazardous" records -- presented their plans to assist member companies improve their safety and health records.

These industries are:

Longshoring, Roofing & Sheet Metal, Meat & Meat Products,
Lumber and Wood Products, and Mobile Homes & Miscellaneous
Transportation Equipment

3. A specific list of recommendations for associations was presented by the Forest Industries Council Safety and Health Coordinating Committee for some 29 industry groups represented on the Committee. Other industry representatives told of similarly stepped-up activities.
4. Many companies, who may not have been under previous Federal laws relating to Safety and Health are going to be confronted with an increasing number of inspectors and compliance officers. These OSHA officials will be entitled to enter and inspect plants, meet with employees and receive employee complaints, and issue citations without notice (although some provision for not more than 24 hours notice is provided in the regulation). In situations of "imminent" hazard they can take immediate steps to shut down operations or an operation.

Considerable informational material was made available at the session. This includes the following:

1. Organization chart of Occupational Safety and Health Administration.
2. Regional offices of OSHA.
3. Area offices of OSHA.
4. Map of regional offices of OSHA.
5. List of "What Associations Can Do," and list of "Other Suggestions for Associations Made Orally in Session."

6. List of "Target Industry" speakers.
7. Forest Industries Council material: (a) Statement by Merlin Race, chairman, Forest Industries Council Safety and Health Coordinating Committee, (b) News release on Race's statement, and (c) FIC's recommendations for Effective Trade Association Safety Action.
8. "A Handy Reference Guide: The Williams-Steiger Occupational Safety and Health Act of 1970," OSHA.
9. "Safety Standards," Vol. 20, No. 3, May-June 1971, OSHA.
10. Labor Department release of May 26, "Labor Department Announces Target Industry Program for Job Safety" (which contains 10-year injury record for target industries, compared with all U.S. manufacturing).
11. Labor Department release of May 30, "Labor Department Issues Initial Safety Standards."
12. Notice of proposed rule making, OSHA, "Inspections, citations, and proposed assessment of penalties," Federal Register, May 5.
13. Occupational Safety and Health Standards, National Consensus Standards, and Established Federal Standards, OSHA, Federal Register, May 29 (246 pp.)

Individual copies of items 1 through 6 may be obtained from Sandy Dankner, Environmental Health Unit, Hill and Knowlton, Inc., 150 East 42nd Street, New York, N.Y. 10017. For No. 7 write Forest Industries Council, 1619 Massachusetts Ave., N.W., Washington D.C. Items 8 through 13 should be available from the U.S. Department of Labor, Occupational Safety and Health Administration, Office of Information, Washington, D.C. 20210.

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