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Steve Gearheart

Safety Director, New-Indy Containerboard



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As we wrap up 2019 and prepare for a new decade with 2020, the board looks forward to developing new opportunities and strengthening partnerships to succeed in our goal of *Bringing the Industry Home Safe!*

A few highlights from our committees this quarter are:

- The Education Committee continues to work on developing webinars based off the programming feedback at our 76th annual conference. Two webinars were held in November. Recordings of our past webinars are available [here](#).
- The board of directors would also like to take a moment to remind the membership about its Call to Action. This publication is available on [www.ppsa.org](http://www.ppsa.org), and the Pulp and Paper Safety Association Board of Directors invites you to read and discuss its Call to Action article available online [here](#).
- The Awards committee has been hard at work preparing for the 2019-2020 awards cycle. The committee is excited to announce a revised Award of Excellence and Vendor award for the coming year. The nomination deadline is April 1, 2020 and awards forms and information can be found [here](#).
- [Registration is now open](#) for the 77th annual Safety and Health Conference, June 14-17, 2020 in Orlando, FL. Space on the exhibit floor is going fast with more than half the 2020 floor pre-sold. For more information regarding exhibits please contact PPSA via [email](#) or phone at 770-209-7300. We hope to see you there!

If at any time you have a suggestion, need assistance, or information on an issue or have a success you would like to share, please do not hesitate to contact us.

We wish you a safe, happy, and enjoyable holiday season and new year!

Stay Safe!

Best Regards,

Steve Gearheart, PPSA General Chairman



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## Quiet Please! “I Have Something to Say”

Randy Adams

Manager, Safety and Health, Graphic Packaging, West Monroe Louisiana

I am positive that most of us have experienced a time when we had something to say but were not able to express anything because of the “Talking Heads”. We will come back to this point later in the document.



I want to share an example of a personal experience. I had been on the job for about 6 months when I was invited to attend an equipment guarding review along with a managerial representative from multiple departments – Engineering, Maintenance, Production and Safety plus the guarding vendor. During the on-the-floor review, Engineering & Maintenance described what guarding would be used and where it would be installed around the equipment. After about 15 minutes of listening to all involved...I raised my hand to ask a question – “where is the operator that will be operating the equipment with the guarding in place?” “Don’t you think they need to provide input?” There was a mo-

ment of silence before the Production Manager spoke up and said “this guarding is to protect them and they will have to learn to work around it”. The Engineering Manager expressed “we know this equipment and have planned this out well.” Well...needless to say I was taken back by these comments. I know they all could see the frustration on my face but I chose to wait to explain my concern in private with the General Manager. The operator was never a part of the “at the equipment review” but later they were invited to hear about what was being installed. There was no regard for the operators’ concerns or any interest in gaining operator buy-in.

My “Talking Heads” point above is simply this...too many times we are so eager to convey our plans, policies, SOP’s, etc. that affect others without listening to the concerns of those that it will directly affect. This is where “Listening Heads” will play a big factor when implementing something that affects others. The listening process can sometimes prevent resistance to change!

If we truly want our greatest asset to be engaged and become a partner – they have to have a voice in the planning, review and implementation. Ask yourself...am I a Talking Head or Listening Head? We have one mouth and two ears for a reason!



# Contractor Committee Meeting

**The newly formed Contractor Safety Committee met at PPSA headquarters to discuss issues pertaining to the safety of our contractor community, establish goals, and develop initiatives. The committee is excited at the opportunity to build partnerships between the manufacturers, vendors and contractors. The safety of our contractors requires a collaborative effort from all of us and this committee's vision will provide valuable insight toward the PPSA reaching its goal – bringing the industry home safe.**



## Committee Goals:

- Elimination of contractor Serious Injury & Fatalities (SIFs) in the Pulp, Paper and Forest Products Industry
- Develop valuable opportunities for contractors to network, learn, share, develop, and improve
- Define contractor leading indicators and remove barriers for suppression of reporting incidents, injuries and near misses
- Foster a partnership where the Pulp, Paper, and Forest Products Industry and their supporting contractors “together” can achieve safety excellence in leadership, communication and empowering employees



To join this committee please contact PPSA Staff at [info@ppsa.org](mailto:info@ppsa.org)



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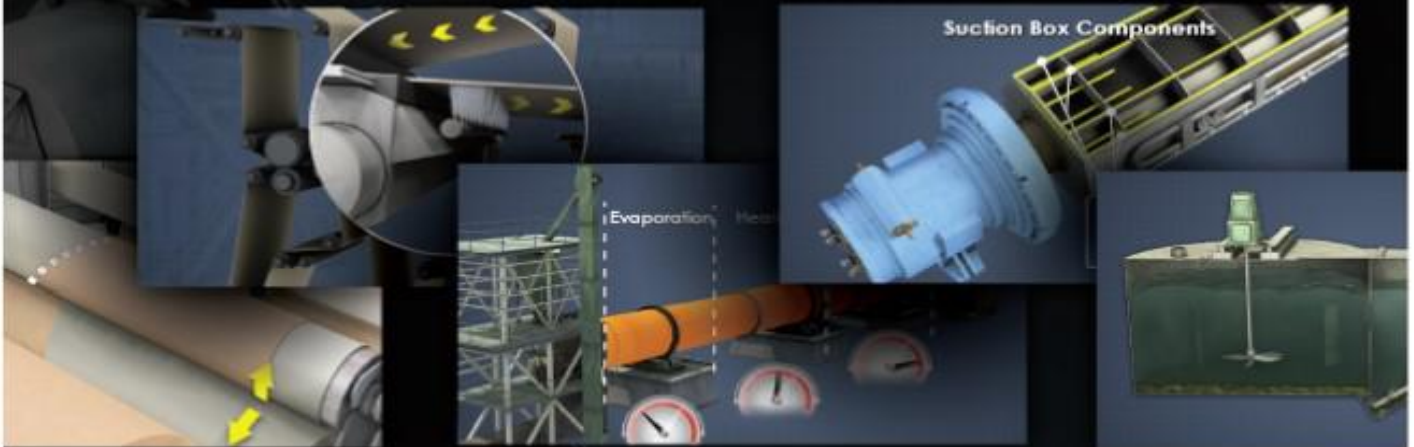
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## Mezzanine Safety Gates: Top Reasons Why You Need Them

Andy Olson

Director of Marketing – Engineered Solutions Group, Rite Hite

How you use the limited space in your warehouse or industrial facility is always an important factor to consider. And as warehouse architects, contractors and engineers are trending toward designing newer warehouses in urban areas with limited square footage, building and expanding up, not out, is usually part of the planning phase.

Building up, however, means evaluating the potential risk of falls from mezzanines or elevated platforms. For this reason, fall protection for elevated platforms and mezzanines must be addressed with mezzanine safety gates - a need for any facility that is looking to expand vertically.

While building vertical may have been logistically challenging in the past, automation has made it not only a viable option but preferred in many cases.

Automated guided vehicles, or AGVs, are now used to improve the throughput speed of products from the end-of-line equipment to shipping. Additionally, the use of automated storage and retrieval systems allow machines to remove the need for the bulk of human interaction by using robotics to move to different levels and pick the products. That said, there still needs to be access for workers, and that's why you need mezzanine safety barriers.

### Mezzanine Safety Gates Meet Applicable OSHA, ANSI and IBC Standards

It's great that mezzanines and raised platforms improve your warehouse's space efficiency, but can also create a dramatic increase in safety hazards. For this reason, certain safety standards and regulations have been put in place to mitigate these risks, and mezzanine safety barriers will allow you to comply and keep your workers safe.

The applicable standards met by mezzanines or platform safety gates include

#### [OSHA Standard 1910.28\(b\)\(1\)](#)

Requires that employers must provide fall protection for personnel on walking-working surfaces 4'0" (1200 mm) or more above the lower level.

#### [OSHA Standard 1910.29\(k\)\(1\)](#)

Requires that employers must ensure toe boards are used on overhead walking-working surface to protect object from falling and injuring employees below.

*Continued on page 14*

*Continued from page 13*

### **ANSI 2009 standard section 6.4.3**

A report published by the Storage Equipment Manufacturers Associations (SEMA) reads, "any gate that provides an access opening through the guards for the purpose of loading and unloading material onto a work platform shall be designed such that the elevated surface is protected by guards at all times. Gates that swing open, slide open, or lift out leaving an unprotected opening in the guarding are not acceptable."

Why do you need mezzanine safety gates? If you are building vertical in your warehouse, ensuring employee safety and staying up-to-date with fall protection standards can set your company apart from the rest. Mezzanine safety and platform barriers are your solution for keeping your employees safe from top to bottom.





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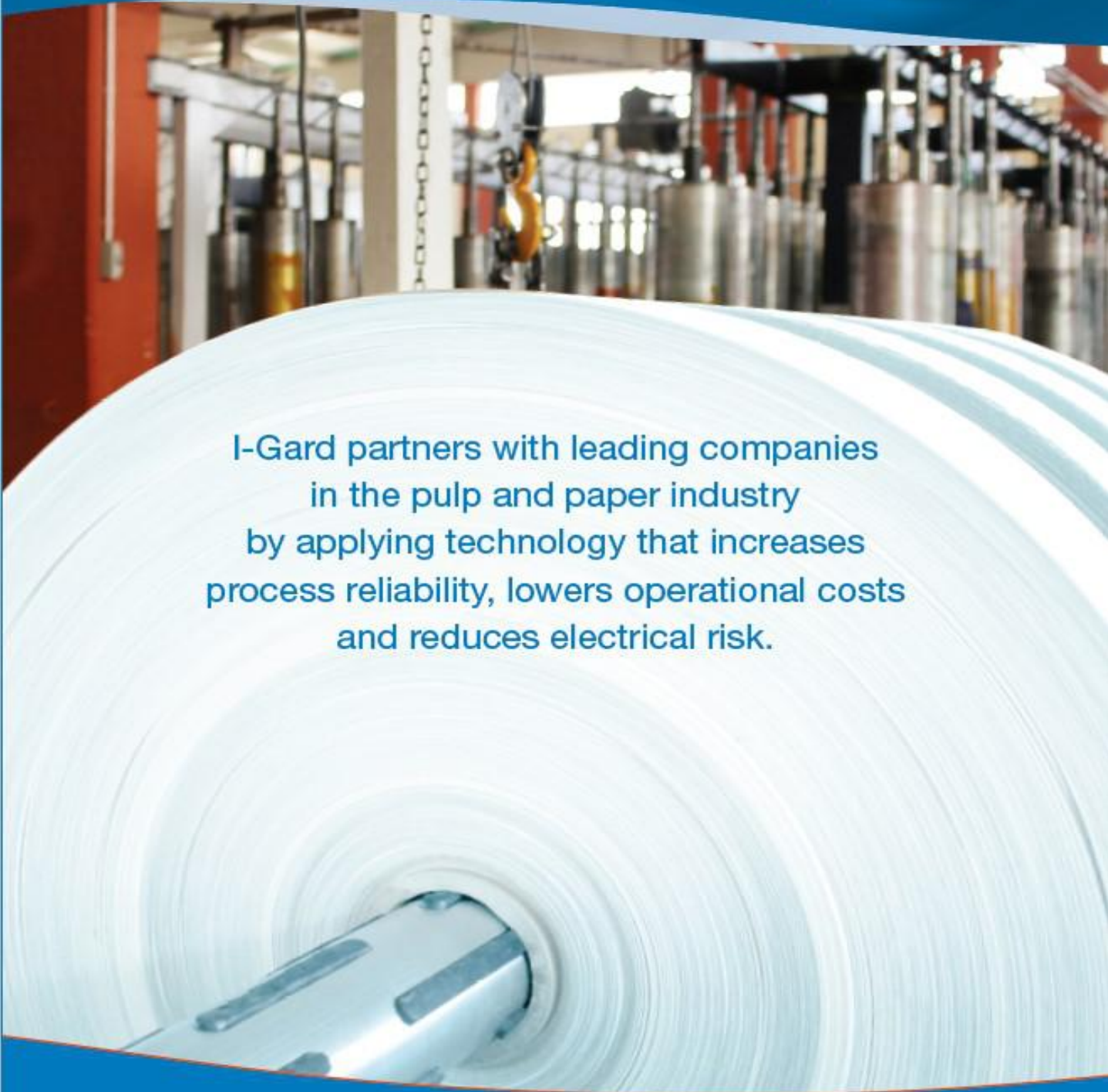
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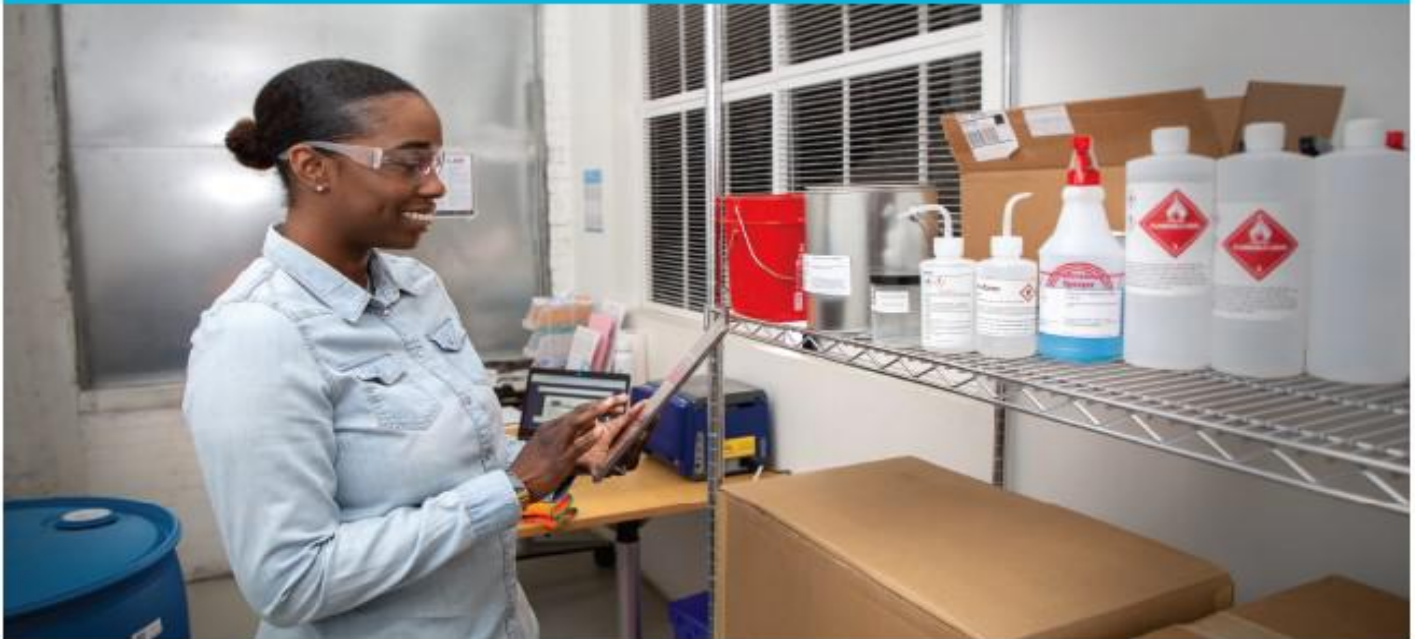
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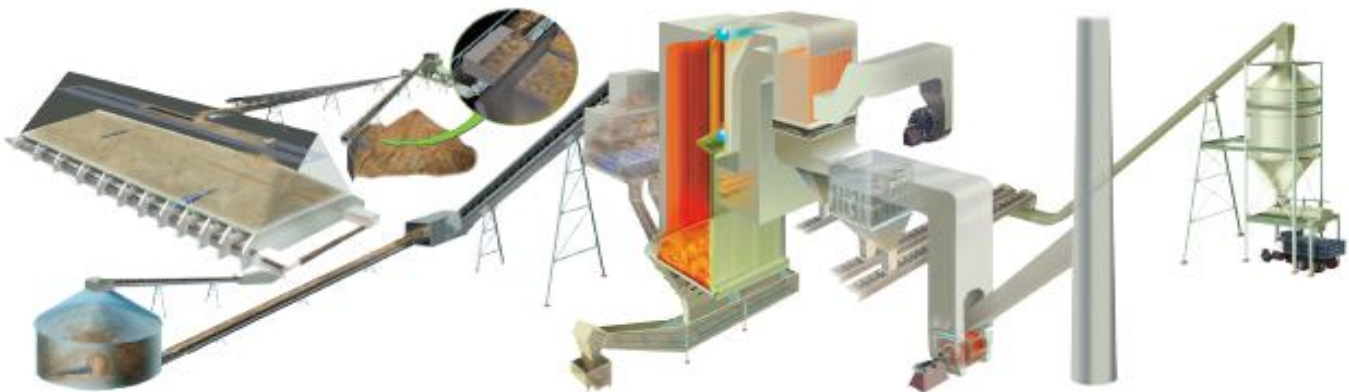
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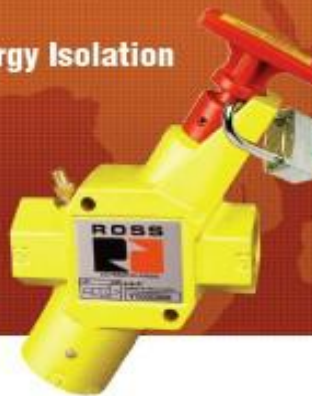


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## PPSA Committees

Below is an update of the current Board members, roles and responsibilities of the PPSA Committees. Everyone on these committees volunteers their time to provide the most beneficial services for all members. The Association appreciates their dedication and support which could not be without the support of each of their companies. An asterisk (\*) next to a committee member's name designates an association member serving on a committee.

### **Executive Committee - [steve.gearheart@new-indycb.com](mailto:steve.gearheart@new-indycb.com)**

The Executive Committee responsibilities include Financial Committee and reviewing PPSA's accounts and annual budgets.

**Members:** Steve Gearheart- New-Indy Containerboard (Chair), Paul Bierley- Domtar , Randy Adams- Graphic Packaging, George Kolesar- Sonoco, PPSA Staff

**Current Activity:** Reviewing the financial needs of the association to maintain overall stability. They continue ensuring the association operates within the current bylaws to sustain the effectiveness of the organization.

### **Conference Committee - [randy\\_adams@ktgusa.com](mailto:randy_adams@ktgusa.com)**

The Conference and Sponsorship Committee is responsible for planning the annual professional development conference and managing the sponsorship for the conference.

**Members:** Randy Adams- Graphic Packaging (Chair), Paul Bierley- Domtar, Tim Elizondo\*- WestRock, Steve Gearheart- New-Indy Containerboard, Matthew Kanneberg- WestRock, Shawn Powell- Brady Corporation, Pete Masias- Green Bay Packaging, Dewayne Bone- Greif, Emma Ragauskas- PPSA Staff, Ashley Westbrook-PPSA Staff

**Current Activity:** Evaluating and planning the conference agenda, securing speakers for selected topics and developing conference events.

### **Membership and Vendor Committee - [paul.bierley@domtar.com](mailto:paul.bierley@domtar.com)**

The Membership and Vendor Committee is responsible for developing, tracking, and increasing both company and vendor PPSA membership.

**Members:** Paul Bierley- Domtar (Chair), Paul Bucek\*- Green Bay Packaging, Sally Boven\*- Reflective Apparel, Allan Cairo- Rite Hite, Randy Adams- Graphic Packaging, Emma Ragauskas- PPSA Staff, Ashley Westbrook- PPSA Staff

**Current Activity:** This committee looks for ways to enhance member satisfaction and the overall value of a PPSA membership including providing our membership access to safety vendors with state-of-the-art technology, products and services. The committee is also currently working to attract more contractor companies to the association.

### **Educational Development - [larry.warren@domtar.com](mailto:larry.warren@domtar.com)**

The Educational Development Committee is responsible for developing courses for PPSA members and non-members.

**Members:** Larry Warren- Domtar (Chair), Matthew Kanneberg- WestRock, Larry Kilian\*- Haws Corporation, Shawn Powell- Brady Corporation, Dick Jackson- International Paper, Brian Bork\*- CR Meyer, Jeff Dalto\*- Convergence Training, Emma Ragauskas- PPSA Staff, Ashley Westbrook- PPSA Staff

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**Current Activity:** The committee is working on several initiatives:

- finalizing and publicizing the details for upcoming continuing education opportunities such as course offerings and webinars
- seeking opportunities to leverage the educational capabilities and efforts of PPSA across the industry

**Awards and Nominations - pmasias@gbp.com**

The Awards and Nominating Committee is responsible for executing the awards throughout the entire year. It includes but is not limited to, the Executive Eagle, Distinguished Service, and Safety Committee/Team awards. This committee will also be responsible for recruiting and vetting new Board Members.

**Members:** Pete Masias- Green Bay Packaging (Chair), Steve Gearheart- New-Indy Containerboard, Randy Adams– Graphic Packaging, George Kolesar- Sonoco, Emma Ragauskas- PPSA Staff, Ashley Westbrook- PPSA Staff

**Current Activity:** The committee is reviewing the criteria of the current awards recognized at the annual conference and working on the potential addition of two awards to increase recognition of our members and sites.

**Communications Committee - shawn\_powell@bradycorp.com**

This committee is responsible for providing content for the various publications and non-event content outlets.

**Members:** Shawn Powell- Brady (Chair), Steve Gearheart- New-Indy Containerboard, Kyle Breiner\*- Domtar, DeWayne Bone– Greif, Jason Roggenbauer– Clearwater Paper, Emma Ragauskas- PPSA Staff, Ashley Westbrook- PPSA Staff

**Current Activity:** Reviewing the current Quarterly Report (QR) newsletter. They also have the responsibility for updating the website and soliciting articles for the next QR from members and vendors. We are looking at different means of social media to provide information and updates to our membership.

**Contractor Committee - matt.kanneberg@westrock.com**

This committee is responsible for providing content for the various publications and non-event content outlets.

**Members:** Matthew Kanneberg- WestRock (Chair), Dick Jackson- International Paper, Brian Bork- CRMeyer, Ted Carroll\*- Jacobs, Dean Kuhlman\*- Thompson Industrial, Bob Thomson\*- Spirit Construction, Danny Oubre\*- Austin Industrial, Clint Thacker\*- C&R Compliance, Joey Norment\*- SFC Contract Services, Cameron Pritchett\*- National Boiler, Fred Kilgroe\*- Andritz, Sam Trotter\*- World Scaffold, Emma Ragauskas -PPSA Staff, Ashley Westbrook- PPSA Staff

**Current Activity:** Recruiting members for the committee and working to increase programming and representation of contractors within the association.

As a member of this association, you are encouraged to provide feedback to the committees either by contacting the chairs directly or contacting [staff](#). Please [contact](#) PPSA if you would like to join a committee as well.





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## **OSHA QuickTakes**

### **Volume 18, Issue 23**



### **Reporting Requirements**

Employers who electronically submit [OSHA Form 300A](#) must provide an [Employer Identification Number](#) as of Jan. 2, 2020.

### **Working Safely in Cold Weather**

During the winter season, OSHA's [winter weather webpage](#) offers tips for staying safe while working outdoors.



### **Walking-Working Surfaces Corrections Notice**

A [notice published in the Federal Register](#) corrects minor errors, and clarifies requirements in the Walking-Working Surfaces and Personal Protective Equipment standards.

## Legal Corner

### **Imputed Knowledge of a Non-Compliant Practice Based On An Ineffective Program**

by Lawrence P. Halprin, Partner

Keller & Heckman, LLP  
Washington, D.C. 20001

A recent OSH Review Commission ALJ decision provides some valuable reminders about grinder wheel safety and also illustrates how the absence of an effective safety program can be used to impute employer knowledge of a non-compliant condition.

URS Federal Services (“URS”) is a large global engineering, design and construction firm with 92,000 employees. URS assigned approximately 375 employees to work under the direction of five supervisors in numerous departments spread across a large area of the U.S. Marines Logistics Base in Barstow, California.

In July of 2018, a URS employee was operating an electric grinder in a welding shop at the base when the grinding stone experienced a catastrophic failure. Although the URS employee was wearing an appropriate face shield, stone fragments penetrated the face shield. He was knocked to the ground and suffered a severe forehead laceration and a concussion that kept him out of work for six months. It is interesting to note that he was not hospitalized, and the resulting OSHA inspection was triggered by a complaint rather than an employer report of a serious injury.

One aspect of the OSHA investigation focused on what had happened and whether there was any history of similar events. It was discovered that the grinder spindle operated at 12,000 RPM but the maximum operating speed of the grinding wheel was 9,070 RPM. The investigation also revealed two previous incidents involving electric grinders. In one case, the rubber backing broke off the grinding wheel and hit an employee in the groin. There was no evidence of a catastrophic failure of the wheel or that the RPM ratings of the wheel and grinder were incompatible. The second case also involved a catastrophic failure of a grinding wheel. There was no information on compatibility and apparent speculation that the wheel was defective. The evidence indicated that a member of the URS safety committee was aware of the incident, but no evidence that URS management was aware of the incident.

Given that OSHA’s Abrasive Wheel Machinery Standard, 29 CFR 1910.215(d)(1) requires, among other things, checking the spindle speed of the grinding machine before mounting the grinding wheel to be certain that it does not exceed the maximum operating speed marked on the wheel, the focus of the OSHA investigation shifted to whether that check had been performed. OSHA and URS quickly determined that the required check had not been performed and then the focus of the investigation shifted to whether URS had actual or constructive knowledge that the required check had not been performed.

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<sup>1</sup>Secretary v. URS Federal Services, Inc., OSHRC Docket No. 18-0278, September 23, 2019.

[https://www.oshrc.gov/assets/1/18/Decision\\_18-0278\\_URS\\_Federal\\_Services\\_\(003\).pdf?9956](https://www.oshrc.gov/assets/1/18/Decision_18-0278_URS_Federal_Services_(003).pdf?9956)

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The primary issue was whether URS had a work rule addressing this required compatibility check, whether it was effectively communicated to all personnel who would be installing grinding wheels on the machines or using the machines, and whether it was enforced. URS demonstrated that its 2016 Tool Safety training for its Barstow personnel covered the grinder wheel compatibility issue. However, OSHA established that URS had assigned new personnel to the welding department subsequent to that 2016 training without confirming they already understood the compatibility issue or providing them with training on the compatibility issue, which was not repeated until after the July 2018 incident.

At some time in 2017, URS issued a written work rule, available on the URS intranet, stating:

Ensure the RPM (as posted on the wheel) is equal to or greater than that posted on the grinder, the disk/wheel is the correct size for the grinder, and the type of wheel is compatible with the material being ground or cut.

However, the work rule was not posted by the grinding machines and a review of the URS safety program at the site failed to establish the work rule was effectively communicated through some other mechanism. URS established that it took the following steps to implement its safety program:

- Gen. safety training was provided to all employees, during orientation and annually, but URS was not able to demonstrate that it covered the compatibility of the grinder spindle and grinder wheel speeds (“the Compatibility Issue”).
- Manager safety training module was provided to all managers.
- Daily tailgate training sessions were provided on a safety topic, which did not include the Compatibility Issue.
- A general job hazard analysis (JHA) was performed by each employee before beginning new work in a different department, but URS did not ensure it covered the Compatibility Issue.
- A task-specific JHA was performed by each employee for each day’s activity, but URS did not ensure it covered the Compatibility Issue.
- There were occasional behavior-based safety (BBS) observations of fellow employees, but URS did not ensure they covered the Compatibility Issue.

The following was viewed as evidence of an inadequate safety program:

- The supervisor of the injured URS employee was responsible for seven departments “spread out all over the base,” which apparently was over 1500 acres, and had limited familiarity with the work being performed in those seven departments.
- The supervisor and on-site safety supervisor supposed to conduct walkarounds, but there was little evidence of that being done.
- In the three years leading up the July 2018 incident, the entire company had only three documented disciplinary actions, two of which were in 2015; none were at the Bartow base or at any URS welding department.

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OSHA issued a serious citation to URS alleging a violation of OSHA's Abrasive Wheel Machinery Standard, 29 CFR 1910.215(d)(1), based on the failure of URS to exercise reasonable diligence by performing spot checks to confirm the maximum rated speeds of the grinding wheels were compatible with the machines on which they were mounted.

The Review Commission ALJ upheld the citation. After explaining why neither of the two previous grinder incidents established actual knowledge of the failure to check for wheel/grinder compatibility, the judge found that the evidence demonstrated constructive knowledge, relying primarily on the principle stated by the Review Commission in *Jacobs Field Svcs. N.A.*, 25 BNA OSHC 1216 (No. 10-2659, 2015):

According to the Commission, the determination of whether an employer has exercised reasonable diligence is based on multiple factors, including “an employer’s obligation to inspect the work area, anticipate hazards, take measures to prevent violations from occurring, adequately supervise employees, and implement adequate work rules and training programs.”

In addition to the factors previously discussed, the evidence presented during the hearing led the judge to conclude:

- that URS “management was largely hands off when it came to inspections and supervision” and instead “placed a significant amount of responsibility for conducting inspections on the employees themselves.”
- the URS “management team ... was shorthanded.”
- URS “did not provide [the supervisor of the injured employee] with sufficient training to perform a more careful and critical examination of his employee’s equipment” beyond mostly checking for required PPE.
- The “appointed supervisor had no experience, and ... no substantive knowledge, in the department he was supposed to oversee; was responsible for six other departments in which he had no substantive knowledge; and had a team lead that had no discernible responsibility or authority over the employees in the ... department.”

Finally, in a warning at self-directed workforces, the judge stated while job hazard analyses and behavior-based safety checklists are laudable efforts, an employer “cannot delegate its duty to supervise and inspect its employees to the employees themselves.”

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*This article is intended to inform readers of recent developments and issues to consider in the field of workplace safety and health. It is not legal advice and may not be relied upon in determining whether a facility or activity is in compliance with applicable legal requirements.*



## About PPSA

PPSA is a non-profit, non-political, international organization, devoted to safety throughout the pulp, paper, and forest products industry. From forest products to paper mills, to converting plants, to recycle collections centers, our membership is grouped by category to ensure a fair and appropriate basis for comparison.

The association began in the 1940's as the Southern Pulp and Paper Safety Association, later changing the name to reflect our widening membership base. We currently have members throughout the United States, Canada and other countries. We work to promote safety, to set reasonable and attainable goals, to educate our members, and to give those members a forum for discussion.

Membership in the Association is categorized by operating facility, such as a paper mill, box plant, sawmill, woodlands, etc. Approximately 380 operating facilities are currently PPSA members. We also welcome supplier members to join PPSA and we plan on extending membership opportunities to contractors that provide services to the companies in our association.

Membership in the Association has many advantages:

- The Pulp and Paper Safety Association is the ONLY national organization exclusively concerned with accident prevention in the forest product industry.
- The Association is an excellent forum for keeping up with latest OSHA standards. In-depth information on specific subjects is increasingly available at regional seminars. The cost of these seminars is minimized by virtue of holding them on a regional basis.
- Participation in the Annual Health and Safety Conference and service as a member of the Board of Directors provides an opportunity for personal and professional growth.
- Participation in our webinars and training seminars.
- The annual Conference provides a great face-to-face networking opportunity.
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## PULP, PAPER & FORESTRY INDUSTRY - A CALL TO ACTION

### HYPER FOCUS & MISUSE OF TOTAL RECORDABLE INCIDENT RATE (TRIR)

It is with great enthusiasm that the Pulp & Paper Safety Association (PPSA) reach out to all our members, our industry, and beyond for a **Call to Action**. For many decades the Pulp and Paper Industry has made great strides in improving safety results. The industry safety journey has moved from a laissez faire approach, through focused compliance, prioritization, adopting a caring and values methodology and today - amidst a true understanding of science - a human organizational performance approach. Our efforts and successes have been immeasurable and many of us are on the cusp of greatness, but one critical challenge remains. There is a seemingly unshakeable obstacle that impacts all industry - a self-induced barrier in how we use lagging metrics -our failures- to evaluate and compare our performance. More specifically and certainly the worst is the use of the Total Recordable Incident Rate (TRIR) to grade, compare and incent not only our organizational performance, but the performance of individuals. Our industry is not alone in this challenge. While a number of organizations within the Pulp and Paper Industry have moved past this barrier, the prevalent cloud of its past misuse remains ingrained in our culture.

For those in the safety profession, the challenges faced regarding this very specific number have been daunting and exhausting to say the least. While it is recognized this regulatory measure provided useful statistical data to the Department of Labor, it is likely OSHA forefathers never anticipated the albatross the TRIR rate would become, or that it would become one of the most hijacked, misused, and manipulated statistic of all time. For safety professionals charged with interpreting a recordable injury, the statistic became one of the murkiest interpreted of all measures even though its criteria are very black and white.

One of the most disillusioning statistic in recent years is the false premise of what was believed to be an indicator of a strong safety performance ... the Holy Grail ... a sustained period of ZERO RECORDABLES. However, when analyzing site Serious Injury & Fatality (SIF) incidents, recent studies have identified no correlation in SIF occurrence between locations with low TRIR and those that experienced higher incident rates. Yes, you are reading that correctly ... over time, facilities that have zero or low incident rates are experiencing SIFs at a rate comparable to sites with higher TRIRs. This is significant in light of many of our organizational systems that focus attention and improvement methodologies on facilities with higher TRIR. By design, we have removed the focus from facilities with few or zero recordable incidents. In reality, instead of using TRIR to manage our safety efforts, we should be measuring a site's organizational capacity and the strength of their risk management systems. Simply put, what we incent, grade, and compare MUST be our capacity and system strengths versus relying on our self-reported - OSHA mandated - documented failures.

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Let's test this philosophy with a comparison of how this data is commonly used today. Answer the following million-dollar question. Given organizations with similar population, risks, and resources, **which of the following sites is safest when comparing their 2017 OSHA TRIR rate?**

**Site A: 3.45 TRIR**

**Site B: 0.00 TRIR**

**Site C: 0.98 TRIR**

If you believe the question is in fact a trick question, it may only be because this article has prepared you for what is a reality. It is simple to illustrate the influence and manipulation that occurs intentionally and unintentionally every day. For the purposes of this analysis, we are going to assume all three sites are not intentionally manipulating the numbers. So, what is your answer? If you have been relying upon TRIR, as many have for the last decades, you will likely lean towards Site B as the best performing site in safety and Site A as the worst. This may appear obvious because the higher ratio of injuries to employee hours indicates more medical treatment is occurring at site A than B. If your answer is that you do not have enough information, you are on the right path to understanding the intent of this article. But for the consummate safety professional and thoughtful leader, the answer is very quickly "the TRIR rate alone gives you little to no understanding of the site's safety performance capabilities." To understand why, let's look at some additional context about each site.

#### **Site A: 3.45 TRIR**

In 2015, the site initiated and rolled out a comprehensive leadership approach using human organization performance methodology. Its primary goal was a reduction in SIFs and to identify precursors and eliminate high risk gaps.

The site only tracks TRIR for annual reporting purposes for OSHA. The site does not use TRIR for a goal, performance bonus, incentive, comparison, grade, or as a measure of safety excellence. Leaders view a soft tissue recordable that was caught early as a positive indicator, believing that an employee may receive medical treatment resulting in a recordable, but likely preventing a rotator cuff surgery in the future.

In addition to an experienced and competent 20-year industry safety professional, the site has a General Manager that experienced a site fatality early in his career after having a string of three years without a recordable incident.

The site's key safety goals for 2017 were:

- Complete separation of powered industrial trucks and pedestrians in ALL areas of the site, not just allowing a focus on warehouse traffic. To accomplish this a site logistical study was conducted, engineering controls were put in where the two types of traffic overlap, significant management system improvements were implemented, and auditing of those systems is on-going.

- A significant capital project kicked off modernizing the site's 40-year-old rewinder where countless SIFs had occurred sporadically over a four-decade period.

- Trend analysis indicated 50% of the injuries experienced were soft tissue related, so an Industrial Athletic Trainer was contracted to target early intervention, implement a proactive ergonomics focus, and conduct a significant amount of wellness training.

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- The site truly and sincerely shares a message that the company cares about employees and their efforts in safety are to drive injury free results and get their fellow workers back home safely. The General Manager is well respected, truly cares for the employees, and is recognized by the company as a good and solid leader.
- One of the site's key system gaps is its limited capacity around incident investigation and root cause analysis skills. And frankly, with such good incident rates they have not had much practice. Though they do have many near misses, some serious, they are not performing a deep dive or rooted cause review. They have recognized from an online benchmarking seminar that tracking near misses is important, therefore one of their annual goals was to collect more. And just like all other safety incentives, they have taken it seriously and have increased near miss reporting by 300% in 2017.
- The site's annual plan aligned closely with the corporate goals:
  - Lower hand lacerations
  - Improve near miss reporting and tracking
  - Track employee involvement in Behavior Based Safety programs
- Shortly after posting their second consecutive 0.00 incident rate for a calendar year, on February 12, 2018 the site had a SIF occurrence. An employee's arm was pulled into a nip and amputated at the shoulder. After company safety professionals investigated, rooted issues in Management of Change (MOC), allowing increased access to the hazard and a 1960's era equipment design allowing an exposed in-running nip were identified.

#### **Site C: 0.98 TRIR**

- The site has a very old school General Manager who has always gotten results with a punitive approach to safety discipline. Of the last five employee reprimands for safety, four were given after an injury had occurred.
  - The site had only two recordable incidents – both were SIF classified injuries:
    - A maintenance employee sustained multiple broken bones after a fall from an elevated work area while trouble-shooting an issue at 2am that was causing down time. The employee was disciplined for not following the written fall protection program.
    - An employee received 30 stitches when he walked around a blind corner in a warehouse and his upper thigh was struck by the forks of a powered industrial truck. "Employee inattention to surroundings" was identified as the root cause.
  - The site has many of the best written policies in their company, but they are almost verbatim to the OSHA standards and are a statement of policy - not a management system. The policies are well communicated, employees have access, and are typically linked to employee misconduct after an injury.
- The site has very little employee engagement and attendance at the central safety committee meeting has been nicknamed the "root canal hour."

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Provided the site scenarios and only a little more information, it's clear that evaluating safety by TRIR alone is misguided. What appears to be the worst performing site (A) has the mature culture and more system capacity than both of the other locations. Site B would have likely received the least attention in a typical comparison. However, the site has a lot of low hanging SIF potential precursors that could be identified by basic safety evaluations or root cause analysis of their serious near misses. But because there were zero recordables, senior leaders instructed resources to attend to other sites with higher TRIRs. The site with the TRIR performance in the middle (site C) most likely had the poorest safety culture. They appear stuck in the dark ages with a philosophy that discipline had a positive impact on safety, which resulted in a cause and effect culture where incidents were not reported, management was not trusted, and employees rarely became engaged!

You likely predicted the skewed results of each site based on the start of this article. But if you believe that these three scenarios do not represent real life situations and are extreme scenarios used to prove a point - you would be wrong. Chances are you're lucky to not have had the hard-earned lesson of the site leader who stood on the edge of a gravesite in the company of a spouse and children of a deceased employee. Who has the lowest TRIR, how our TRIR compares to others, or if we receive a bonus attributed to a TRIR is inconsequential if we continue to have SIF incidents. Sadly, at a micro level, the incident rate does not have the significance we once thought it did. And the gut realization that all of the collective effort, energy, and manipulation used to manage that number to zero took our eye off the real goal and continues to do so today.

What truly matters is the elimination of serious, fatal and life changing injuries. Of course, no one wants any injury, including those requiring minor care. Therefore, we should investigate with rigor and put in controls to prevent their occurrence. But it is paramount that when given our risk, the challenge of fast paced technology, increased turnover from an aging workforce, limited resources, the drive to become more competitive – we must focus on the higher risk first and not waste time on engaging and distracting our limited resources on managing and manipulating a number that does not indicate safety performance on a micro level. In certain instances, such as early intervention of soft tissue injuries, a recordable incident may be a positive metric of holistic prevention! While this discussion on the manufacturing industries reliance on and the significance of the Total Recordable Incident Rate may have struck a nerve, to ignore the argument and disregard the challenge this article sets forth could stall our industry progress towards serious injury and fatality prevention.

Let's focus on some industry comments in recent years.

**A veteran safety professional-** *I've worked for many site leaders and thankfully today, my current leader gets it! I once worked for a leader who said he would decide what is and isn't a recordable. He also insisted I try and get into the doctor's office to explain we have OTC medications on site and to encourage the doctor not to restrict work because we will let the employee take it easy. I am so happy where I am now, and I avoid wasting hours stressing over minor things or trying to be a doctor...I can now focus on really impacting safety.*

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**A corporate safety professional-** *After acquiring a new company, I was hearing a lot of chatter on conference calls about 'avoiding' recordables. The energy was around how to avoid a recordable 'after' an injury and very little about root causes and prevention. One of the sites was really vocal about the effort they made to keep treatment in house and avoid a doctor because they had a nurse. I arranged a conference call with the site (General Manager, Safety, and medical staff) and as a responsible leader from the new legacy company, I became very direct and explained as a part of our new company we expected ALL injuries to be recorded by the book. I insisted the regulations and interpretations were very clear and precise, and it was an expectation not to manipulate the numbers. I encouraged them to focus more on the prevention before someone went to the doctor versus trying to be doctors themselves. I was very respectful and made it clear I was there to support them and my effort to be direct on the subject was to help them be successful. After the call, the site nurse called me personally, crying and thanking me. She explained she had been asked on many occasions over the years not to document portions of the actual treatment given so that they would avoid a recordable. She advised this was very much in conflict with the way she was taught to document and detail. I assured her those days were over and thanked her for her thoughtful support.*

**A recently hired Senior Operational Leader-** *I transferred from an industry competitor that was very focused on Human Organizational Performance and Human Factors and the company had long since abandoned the internal use of TRIR. Within the first month of working for my new company, I heard that the company CEO wanted to be at the top of the industry related to TRIR. I understand he wants to be competitive but believe he demonstrated a failure to understand what TRIR was designed to measure. Very frustrated to take a step back in safety philosophy, and I've now come to recognize that many of our Senior Leaders really don't get it!*

**A facility General Manager-** *I've always felt like the emphasis we put on TRIR was hypocritical. At times when we were really working hard on safety focusing on engagement and management systems, I was still getting tons of pressure from Senior Leaders to do more because we had a few recordables, none of which were serious. Then at other times, when I had a zero, no one bothered me. It felt good to be out of the spotlight, but eventually we started getting complacent and had more serious near misses, but no one was looking at those. As I have matured as a leader, I have ensured I have strong safety resources, good employee engagement and all my leaders working on high risk systems. I deflect the focus on TRIR from the outside away from our employees and just do the right thing. But I still have that TRIR looming over my head with no real consideration to what I am really doing on site. I also have a really hard time getting capital money just for safety when there is no return-on-investment. The corporate group hammers me for a few minor recordables but when I explain I need capital to update aging hazardous tanks, their safety hammer vaporizes!*

If you have been in a site safety or key leadership role for more than a decade, it's almost certain you have heard or lived these examples. And to be kind, we have left out many examples of misuse and manipulation of TRIR, where the decision was unethical and willful and often times affected the potential to receive awards and monetary bonuses. The saddest part of all, is that these decisions were self-inflicted using a TRIR measure that was never intended to be used at a micro level. And, in most cases where the number was manipulated, there was an unintended cause and effect - one where leaders at all levels had no intention of creating a barrier and certainly cared about people and an improvement in safety. Whether it's unintended or willful, in order for true and effective safety practices, systems and culture to grow, the practice must stop.

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- We ask that all industry companies and supporting associations that are still using TRIR inappropriately to stop using TRIR measure to incent, grade, or compare a company, division, or site's safety strength. Using the TRIR number to compare your company's strengths against a competitor is not helpful, and just like the three site examples given above, may falsely direct you to or away from benchmarking a better company. We encourage companies to track solely for its intended purpose and replace the lagging metric with high severity metrics and leading metrics that identify SIF precursors, measure employee engagement, and specifically target demonstrated leadership activities at ALL levels. This includes not using TRIR for monetary bonuses, prizes, or any perceived carrot that is dangled and then taken away when a failure occurs. Simply **STOP** measuring performance by failures, and **START** looking at capacity and system strengths. Focus on high risk activities with continuous improvement in applying multilevel engineering and elimination controls. This includes removing location signage that indicates "days without an injury" – as that number increases, it often leads to suppressing incident reporting.
- We ask industry senior leaders to seek to understand how misuse of TRIR has affected your company in the past and present. We encourage open debate in a non-threatening atmosphere where leaders at a site level can share the dynamics and influences when the measure is used inappropriately. Listen to your competent and trusted safety professionals who have worked in and around this barrier for decades. Collaborate with the human resources function to align performance management, recognition, and reward systems towards leading indicators.
- For companies who have already abandoned this misuse and overemphasis, reach out to fellow competitors, and help guide them to remove this self-induced barrier which can have an unintended cause and effect. For those most mature amongst our industry - share your testimonials regarding how you care about employees' quality of life. Advocate the use of medical resources, early intervention of pain and discomfort and err on the side of caution to ensure employees receive quality care directed by healthcare providers. Encourage colleagues to do all these things in good faith, even if that compassion comes with tipping the scales of compliance with a need to record even a very minor injury.

**A final thought from a 25-year industry safety professional-** *The day I can just care about an employee at the moment they have an issue (pain, medical concern, injury or potential re-aggravation of a personal injury) and just help them get medical attention without the albatross of negative consequences hanging around my neck...I will likely go to my office, close the door and really just have a good cry. No one really understands how we are conflicted to always do the right thing when we could be admonished for providing reasonable care. Why can't we provide a level of medical treatment that exceeds all abundance of caution while showing compassion for a fellow employee? The cost is inconsequential compared to the long-term credibility damage we cause when managing a case to avoid the OSHA recordable threshold. I am just exhausted playing the recordable game all these years.*

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