


Hoofs and Feathers – OSHA's Food Manufacturing Emphasis Program

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Wisconsin Safety Council - April 15, 2025

1



U.S. DEPARTMENT OF LABOR
Occupational Safety and Health Administration

DIRECTIVE NUMBER: CPL 04-05-2306
SUBJECT: Regional Emphasis Program for Food Manufacturing Industry
REGION: V
SIGNATURE DATE: September 22, 2021 **EFFECTIVE DATE:** October 1, 2021

ABSTRACT

Purpose: This Notice establishes a Regional Emphasis Program (REP) for the purpose of scheduling and conducting inspections within the Food Manufacturing industry. This Notice updates existing but separate emphasis programs.

Scope: Area Directors shall use the procedures described in Paragraph VIII of this Notice as the basis for developing and implementing inspection activity in those facilities that produce and manufacture food products.

References: [CPL 02-00-164 - Field Operations Manual \(FOM\)](#), April 14, 2020
[CPL 04-00-002 - Procedures for Approval of Local Emphasis Programs](#), November 13, 2018
[CPL 02-00-025 - Scheduling System for Programmed Inspections](#), January 4, 1995
[CPL 02-00-051 - Enforcement, Exemptions, and Limitations Under the Appropriations Act](#), May 28, 1998

Action Officers: This Regional Instruction applies to the Federal OSHA enforcement offices in Illinois, Ohio, and Wisconsin.

Originating Office: Chicago Regional Office

2

Wisconsin Industry Coverage

3114xx	Fruit and Vegetable Preserving and Specialty Food Manufacturing
311411	Frozen Fruit, Juice, and Vegetable Manufacturing
311412	Frozen Specialty Food Manufacturing
311421	Fruit and Vegetable Canning
311422	Specialty Canning
311423	Dried and Dehydrated Food Manufacturing
3115xx	Dairy Product Manufacturing
311518	Dairy Product (except frozen) Manufacturing
311511	Fluid Milk Manufacturing
311512	Creamery Butter Manufacturing
311513	Cheese Manufacturing
311514	Dry, Condensed, and Evaporated Dairy Product Manufacturing
311520	Ice Cream and Frozen Dessert Manufacturing
3116xx	Animal Slaughtering and Processing
311611	Animal (except Poultry) Slaughtering
311612	Meat Processed from Carcasses
311613	Rendering and Meat Byproduct Processing
311615	Poultry Processing
	Contract Employers at the Host Food Mfg. Facility
561720	Janitorial Services
561790	Other Services to Buildings and Dwellings
561990	All Other Support Services
926140	Regulation of Agricultural Marketing and Commodities

3




TABLE 6: Private Manufacturing Rates in Wisconsin in 2020

Category	Food Manufacturing Rates (NAICS 311xxx)	Manufacturing Rates (NAICS 31-33)
Total recordable cases ⁶	4.6	3.7
Cases involving days away from work, job restriction or transfer ⁶	3.5	2.2
Fractures ⁷	17.1	10.9
Amputations ⁷	5.6	3.8
Cuts, lacerations, punctures ⁷	13.4	9.8
Chemical burns and corrosions ⁷	6.1	1.4
Heat (thermal) burns ⁷	3.7	2.0

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4





TABLE 7: Rates for Selected Food Manufacturing Industries in Wisconsin in 2020

Category (2020 rates)	Wisconsin Private Manufacturing (NAICS 31-33)	Fruit and Vegetable Preserving and Specialty Food Mfg. 3114xx	Dairy Product Manufacturing 3115xx	Animal Slaughtering and Processing 3116xx
Fractures ⁷	10.9	13.9	28.1	15.0
Amputations ⁷	3.8			16.1
Cuts, lacerations, punctures ⁷	9.8		11.7	22.2
Chemical burns and corrosions ⁷	1.4		13.6	
Heat (thermal) burns ⁷	2.0		6.4	

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5



OSHA Inspection Procedures (from LEP)

1. Verify NAICS Code
2. Review OSHA 300 injury logs for injuries relating to:
 - Machine Guarding
 - Hazardous Energy
3. Evaluate hazardous energy program, written procedures, training and annual periodic inspection of control procedures, including review of sanitation operations
4. During walk around
 - Observe employee interaction with food production machinery
 - Evaluate machinery for guarding deficiencies
 - Assess potential contact with hot or cold equipment
 - Assess potential contact with corrosive chemicals
5. Observe service or maintenance activities including activities outside normal production schedules

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6

Program Elements to be evaluated

- Machine Guarding
- Control of Hazardous Energy
- Hazard Communications
- Other Hazards (trends during past 3 years), may include:
 - Noise
 - Hazardous Chemicals
 - Refrigeration Chemicals
 - Personal Protective Equipment
 - Process Safety Management
 - Powered Industrial Vehicles
 - Electrical
 - Falls
 - Walking Working Surfaces
 - Permit Required Confined Spaces
 - Combustible Dust
 - Struck-by hazards
 - Bloodborne Pathogens
 - Emergency evacuation plans/procedures
 - Temporary Labor Camp conditions

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7

Wisconsin Inspections Data by NAICS Code since 10/1/2023

NAICS Code	Total Inspections	Foodman Inspections	Closed with no Violations	Inspections with Violations	Open Inspections
3114xx	27	10	0	10	0
3115xx	78	36	8	23	5
3116xx	35	4	1	3	0
561720	10	5	4	0	1
561790	4	0	0	0	0
561990	1	0	0	0	0
926140	0	0	0	0	0
	155	55	13	36	6

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8

Citations Issued in the Wisconsin Foodman Inspections through 3/25/2025:

Standard	Total Citations	Total Penalties
1910.22 Working Working Surfaces - General	2	\$ 22,547
1910.23 Ladders	4	\$ 24,064
1910.28 Duty to have Fall Protection & Falling Object Protection	27	
1910.29 Fall Protection & Falling Object Systems	2	
1910.36 Exit Routes - Design & Construction	14	
1910.37 Exit Routes - Maintenance, Safeguards	2	
1910.95 Occupational Noise Exposure	2	
1910.119 Process Safety Management - Highly Hazardous Chemicals	2	
1910.132 Personal Protective Equipment - General	2	
1910.133 Eye and Face Protection	2	
1910.134 Respiratory Protection	2	
1910.147 Control of Hazardous Energy (Lockout/Tagout)	52	
1910.151 Medical Services and First Aid	4	
1910.212 Machinery and Machine Guarding - General	27	
1910.215 Abrasive Wheel Machinery	2	
1910.219 Mechanical Power-Transmission Apparatus	14	
1910.106 Electrical - Working Methods, Components	2	\$ 20,740
1910.1000 Toxic and Hazardous Substances	2	
1910.1200 Hazard Communication	14	\$ 40,613
TOTAL	197	\$ 1,076,872

These 95 citations of the Total 197 citations issued = 48%

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9

- Do you have a machine specific procedure for each machine?
- Do you have a periodic inspection certification for each procedure?
- Do you have documentation of training for all authorized and affected employees?
- Go to each of the machines and ask:
 - Are all rotating conveyor to roller pinch points guarded?
 - Are all chains/sprockets guarded?
 - Are wrappers guarded?
 - Are choppers guarded?
 - Are palletizers guarded?
 - Are rotating shafts guarded?
 - Are ends of rotating shafts guarded? (unless smooth and short 1/2 diameter)
 - Are motor drive rollers on inclined belts guarded?
 - Are heat sources guarded?
 - Are overhead belts going into freezers guarded?
 - Is machinery inside of freezers guarded?

10

- Watch the sanitation process, starting with breakdown by maintenance:
 - Are guards removed while machines are still operating?
 - Are machines locked out by maintenance and then unlocked for sanitation?
 - Are group lockout principles being followed – one lock/one person, two locks/two persons?
 - Are other machine parts involving blades and rotational hazards also running during sanitation that could be sanitized without movement?
 - How are employees protected from running parts during sanitation?
 - Look for in-running nip points and other hazards during sanitation and if they exist, are there any techniques like no touch, long wand, temporary barriers that keep employees away from hazards, available.
- Are grinding wheels work rests and guards properly adjusted?

11

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12
