

## AMI Opposes Electronic Submission of Injury, Illness Data to OSHA

WASHINGTON (AMI) — [In comments filed last week](#), [1] AMI strongly opposed a new Occupational Safety and Health Administration (OSHA) proposal that would require employers to electronically submit injury and illness information currently in the 300A, 300, 301 Forms to OSHA. Each establishment with 250 or more employees would have to report quarterly and establishments with 20 or more employees in certain designated industries would have to report annually. The agency also proposed that it be permitted to require any employer to submit more detailed information about specific injuries and illnesses. OSHA also would provide public online access to the injury and illness records purportedly to allow "the public, including employees and potential employees, researchers, employers, and workplace safety consultants, to use and benefit from the data."

According to AMI, the proposal will not improve workplace safety and health. "More frequent submission of data will do nothing to enhance workplace safety and health," AMI said. "Operations personnel in manufacturing facilities are well aware of injury and illness incidents on an ongoing basis and areas or jobs where such incidents occur are targeted for safety review and improvement." The proposal would create unnecessary work and costs, AMI said and argued that the agency grossly underestimates the cost and amount of time that would be required to comply with this proposal. OSHA estimated 440,000 establishments would be required to submit data. Done quarterly, there would be 1.76 million submissions (i.e. just OSHA 300 logs) annually.

Finally, AMI said that public release of the data would create privacy problems. "OSHA ignores several court rulings that have found employers to possess a privacy interest in such data, and fails to consider the implications of publishing it. Public disclosure of the data not only provides competitors with confidential business information, but it also jeopardizes security, putting workers and the public in danger," AMI said. "For example, OSHA intends on publishing the addresses of certain businesses that produce, store, or maintain highly sensitive, hazardous or valuable products or commodities. Depending on the nature of the business, publicizing locations and number of employees could leave a business vulnerable to criminals or worse."

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<http://www.foodmanufacturing.com/news/2014/03/ami-opposes-electronic-submission-injury-illness-data-osh>

**Links:**

[1] <http://r20.rs6.net/tn.jsp?e=001vEKI1sWvWuLK5CqtJr1tFJqPsNRtTXne7SzeDjAQsM>

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