

OSHA:

The End of the Era of Low Hanging Fruit?

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Project on Scientific Knowledge and Public Policy

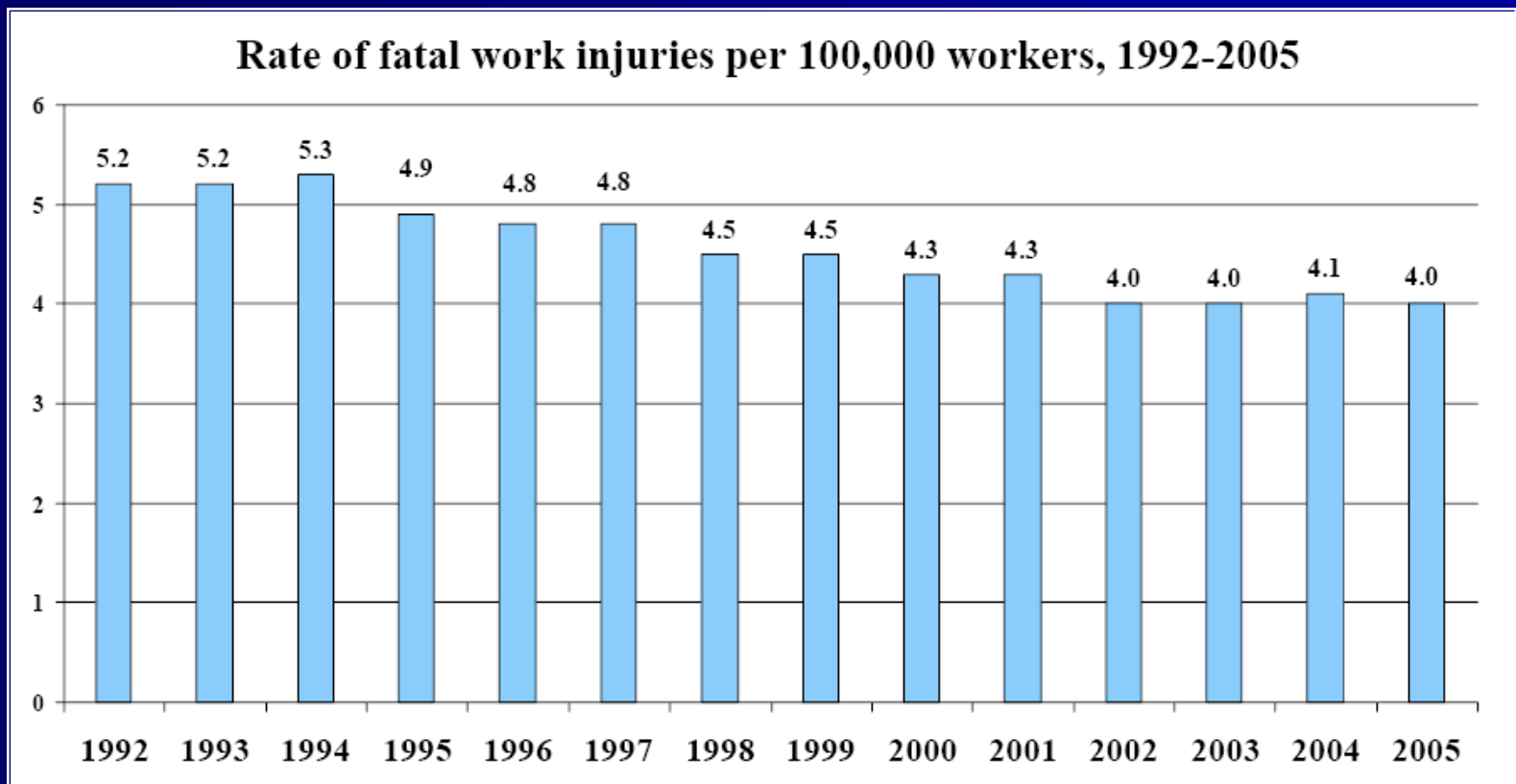
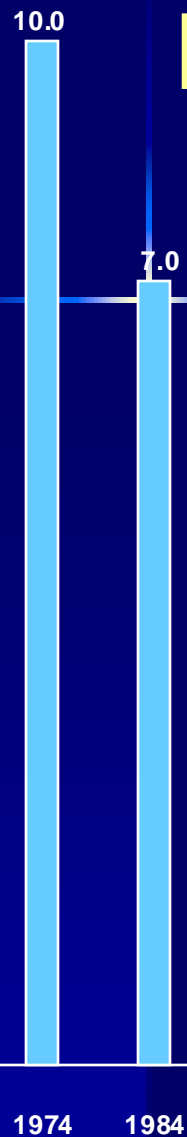
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www.DefendingScience.org

What Has OSHA Accomplished?

- Prevention of Work-Related Fatality and Injury Rates
 - How much fact and how much artifact?
- Prevented Occupational Illnesses
 - Reduced exposure to recognized hazards
- Low Hanging Fruit?

Decrease in Fatal Work Injury Rate



<http://www.bls.gov/iif/oshwc/foi/cfch0004.pdf>

How Complete are BLS Injury Statistics?

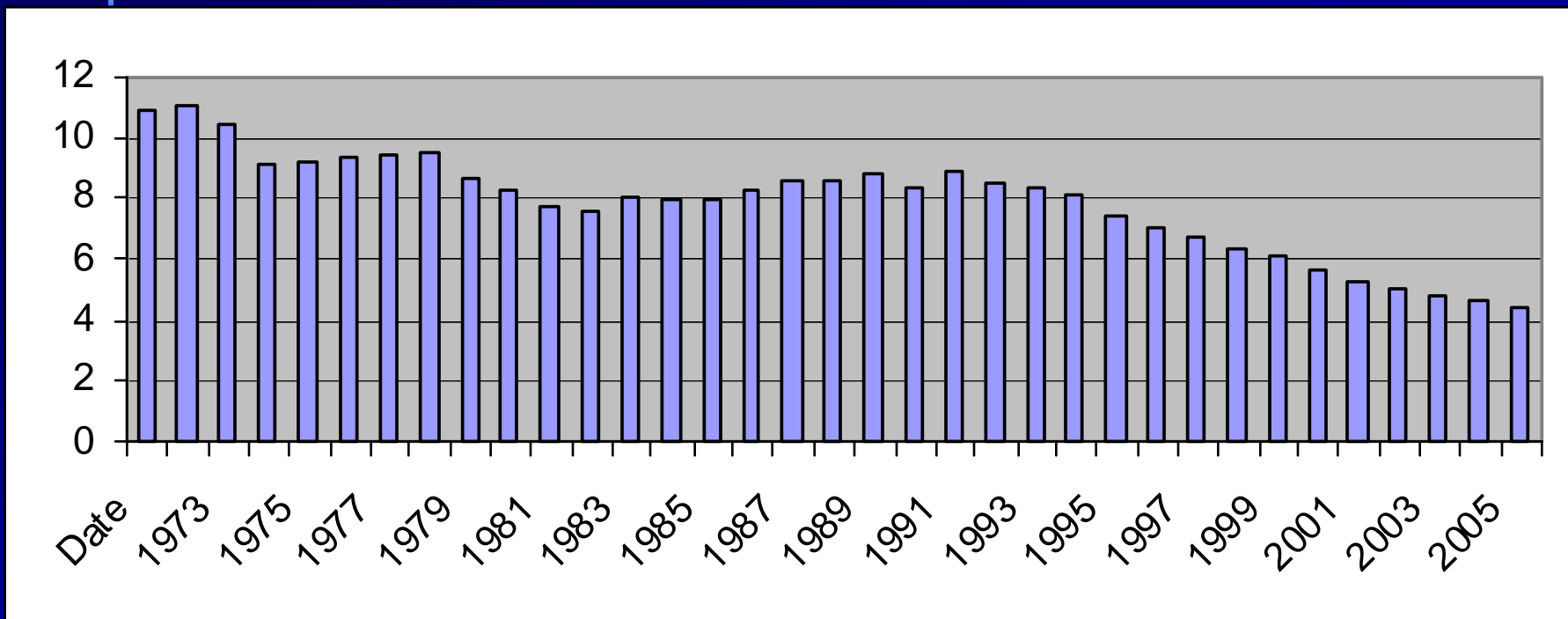
- BLS statistics do not count approximately two-thirds of all work-related injuries (and illnesses).

Rosenman KD, et al. *J Occup Environ Med*, 2006;48(4): 357-365

- BLS statistics do not count between 33% and 69% of all work-related injuries.

Leigh JP, Marcin JP, Miller TR *J Occup Environ Med* 2006;46(1):10-18

Decrease in Injury (and Illness?) Rates



**Injury (& Illness?) Incidence Rates per 100 workers
1972-2006**

Work Injury Rate Decline

- Modest decline in first decades
 - 1972 to 1992: 18% drop
- Dramatic decline more recently
 - 1992-2006: 48% drop
- Accomplished with fewer OSHA inspectors
 - 1300 in 1990; 1100 in 2003

Possible Reasons for Injury incidence Drop

- True decrease in risk
 - Success of OSHA advice programs
- Change in mix of industries
 - Less employment in hazardous industries?
 - But decrease is seen in industry-specific stats
- Artifact of changes in reporting

Are Injury Rates Decreasing?

- One analysis attributes 83% of the decline in workplace injuries and illnesses between 1992 and 2003 to changes in OSHA record-keeping rules.

Friedman LS, Forst LS. *Occup Environ Med*. 2007; 64: 454-460

- From 1995 to 2003, there was no drop in occupational traumatic injuries reported to the Illinois Trauma Registry.

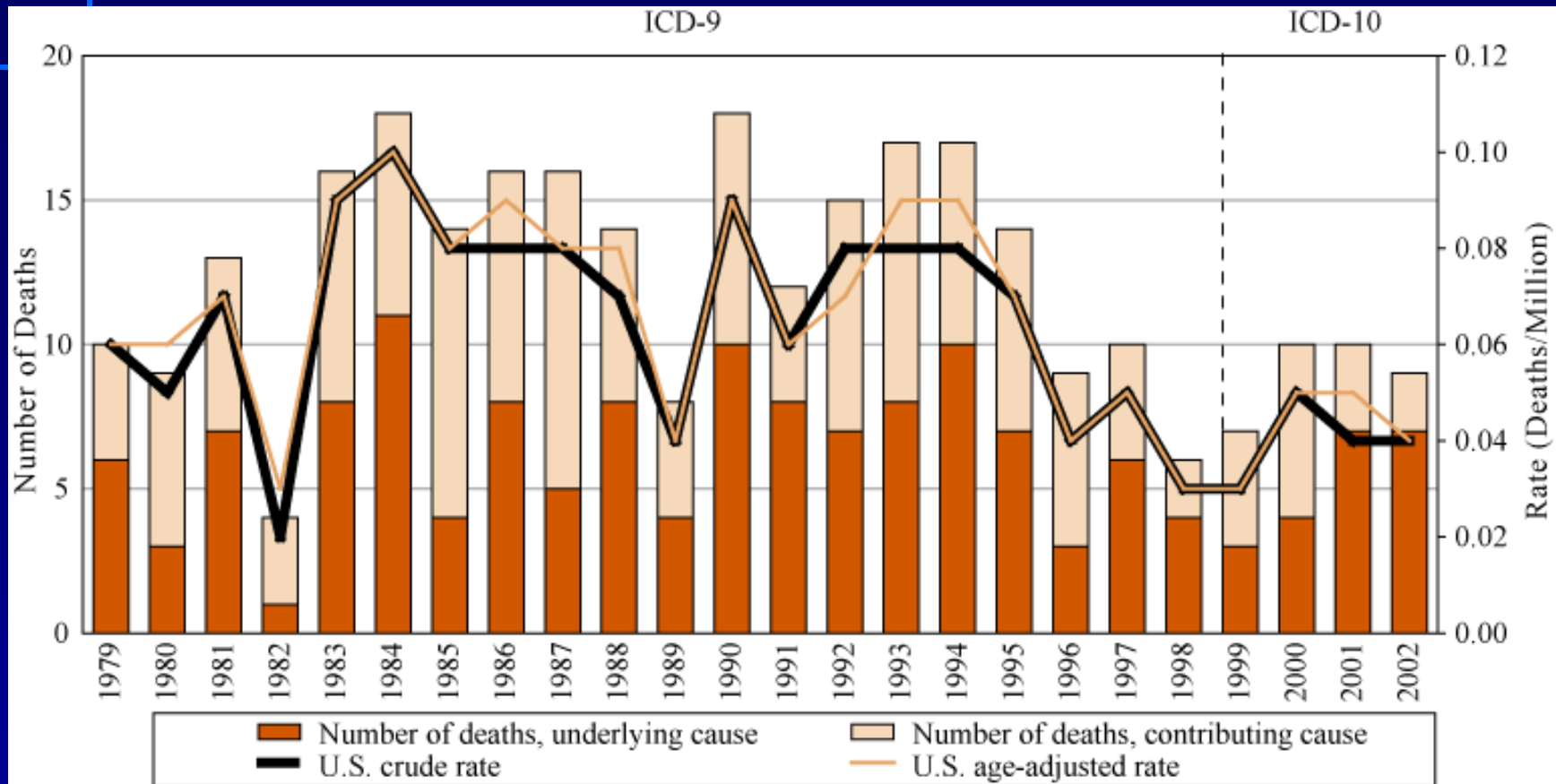
Friedman LS, Forst LS J *Occup Environ Med* 2007; 49: 401-10

Occupational Illness Prevention

- Most occupational illnesses never recognized or reported as such
 - Therefore statistics miss most cases
- OSHA has reduced exposure to some recognized hazards
 - Asbestos, silica, lead, cotton dust
- Ergonomics: OSHA's most notable failure

Byssinosis

Number of deaths, crude and age-adjusted death rates, U.S. residents age 15 and over, 1979–2002



Source: NIOSH, Work-Related Lung Disease Surveillance System, DHHS (NIOSH) Publication No. 2003-111 (May 2003)

Challenges to OSHA's Ability to Prevent Occ. Illnesses

- Current set of OSHA health standards are inadequate and outdated
- Procedural Botox
 - Necessity of congressional or judicial mandate

OSHA Chemical Standards

>60,000	Number of chemicals in commerce
~ 500	Number of chemicals with OSHA PELs
~ 3,000	Number of High Production Vol. chemicals (>1M lbs produced/imported per year)
~ 200	Number of HPV chemicals with PELs
~ 470	Number of PELs adopted OSHA in 1971
3	Number of new OSHA PELs in last 15 years

What Can OSHA Do?

- Issue Comprehensive Workplace Safety & Health Program Standard
 - Chemical by chemical rule-making simply won't work
- Revive General Duty Clause

What Can Congress Do?

- Mass Adoption of Voluntary Standards
- Require OSHA issue specific standards
 - Diacetyl, Beryllium, Silica

What Can We Do?

- Put worker safety and health back in the public spotlight
- Rethink the system through which we as a society ensure workers are not killed, injured, or made sick by their jobs.