NDA Submits Comments on OSHA Injury and Illness Tracking Rule

This week, NDA submitted <u>comments</u> on behalf of the demolition industry to the Occupational Safety and Health Administration (OSHA) regarding their proposed rule to improve the tracking of workplace injuries and illnesses. OSHA is proposing to amend its occupational injury and illness recordkeeping regulation which requires employers to electronically submit injury and illness information to OSHA.

Under the proposed rule, demolition contractors with 20 or more employees would continue to be required to electronically submit information from their OSHA Form 300A annual summary to OSHA once a year. OSHA is also proposing to require establishments to include their company name when making electronic submissions to OSHA.

NDA expressed concerns that OSHA's proposed rule would impose an additional administrative and financial burden on demolition contractors with minimal benefits to the safety of employees. The proposed rule would be particularly onerous and complex for employers who have multiple establishments and limited staff resources to comply with the additional administrative paperwork and reporting requirements. NDA asked OSHA to withdraw the proposal and make no substantial changes to the existing recordkeeping and reporting regulations that were promulgated in 2019.

NDA also joined the Coalition for Workplace Safety in submitting <u>comments</u> on behalf of over 60 organizations opposing OSHA's new changes to the injury and illness reporting rule and expressing concern about its impact on employers.