



ILA-UMX JOINT SAFETY COMMITTEE

OSH Circular 2015-09 (21 August 2015)

On Being A Pedestrian At Marine Terminals

Unsafe, Under Most Conditions

The recent accident at a Mid-Atlantic port, in which an ILA member was struck and killed by a toploader, is but the most recent reminder that marine terminals are not pedestrian-friendly pieces of real estate. Looking back in time, there have been several pedestrian-versus-machine accidents occurring at marine terminals that each give witness to two distinct facts:

- **In such accidents, the victims seldom survive; and**
- **Marine terminal workers are much better off avoiding any uncontrolled pedestrian activity**

The Occupational Safety & Health Administration (OSHA) has a regulation in place that recognizes those facts and that addresses the pedestrian/machine interface and the hazards associated with that interface at container & RoRo marine terminals. Here's what it looks like:

1917.71(d)(1)

Marked or designated areas shall be set aside within a container or roll-on roll-off terminal for passage of employees to and from active cargo transfer points, except where transportation to and from those points is provided by the employer.

What that regulations means, is that **marine terminal employers are responsible** for either marking (with signage/stripping) and/or designating (by setting policy and providing training/education to workers) pedestrian walkways that will get workers on foot to and from active cargo transfer points out of harm's way. Alternatively, the employer may choose to provide transport conveyances (such as buses, trams, etc.) that will safely get workers from Point A to Point B to Point C, etc.

Pedestrian employees have the responsibility to use only marked/designated walkways. If the employer chooses to provide transport conveyances, then it is the obligation of all workers to use them; without variation.

The ILA-UMX Joint Safety Committee urges all ILA members and all marine terminal operators to take the steps necessary to comply with the relevant OSHA regulation, and offers the full spectrum of its technical abilities to assist the industry in attaining that goal.

Working Together For The Benefit Of All

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