

# Shipbuilders Council of America

OSHA's Top Priority: The Injury &  
Illness Prevention Program (I2P2)  
Rule

# Overview

- What is the I2P2
- Scope?
- Objective?
- Impact?
- Status

# What is the I2P2?

- I2P2 is based on a standard safety & health management program that incorporates “policies, procedures and practices that are adequate to recognize and protect employees from all occupational safety and health hazards.  
\*\*1/26/89 OSHA Guidelines.

# What is the I2P2?

- Components of an I2P2
  - Employer Obligations
  - Employee Participation
  - Hazard ID/Prevention/Control
  - Education and Training
  - Program Audit and Improvement

# Scope of an I2P2?

- What will the I2P2 cover?
  - All hazards covered by OSHA standards?
  - All hazards covered by the general duty clause?
  - All hazards identified by the OSHA 300 system?
  - Ban on incentive programs? Requirement to report all serious injuries?

# Impact of an I2P2

- One size fits all program
- Effectively amends every OSHA standard and the general duty clause with one single rulemaking by imposing I2P2 requirements
- Another run at ergonomics
- Citation mill

# Conclusion

- Safety and health management plans are important voluntary systems but are not suited as an enforcement tool.

# Status

- Prerule stage
- Surveys went out
- SBREFA Panel to convene