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Don't Get Caught Off Guard: OSHA Renews Its Machine Safety (Amputations) National Emphasis Program

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OSHA [announced](#) that it is renewing its [National Emphasis Program \(NEP\) to Address Amputations in Manufacturing](#). The renewed NEP will replace the previous version which expired on June 27 and will remain in place for five years, through June 26, 2030.

Why is OSHA Renewing the Manufacturing Amputations NEP?

Amputations, in OSHA's view, continue to be one of the most devastating and preventable workplace injuries. Indeed, both lockout/tagout (LOTO) and machine guarding, which are generally recognized as related to amputation hazards, are consistently among OSHA's most ten frequently cited standards. As part of the updated NEP, OSHA focused on manufacturing North American Industry Code System (NAICS) codes with:

- high inspection numbers related to LOTO and machine guarding
- fifty or more amputations per year for calendar years 2019-2022 according to Bureau of Labor Statistics data
- twenty-five or more employer-reported amputations for calendar years 2019-2023

The renewal includes an updated list of NAICS codes.

Which Employers Will Be Targeted For Inspections?

Establishments in each of the following NAICS codes are subject to both NEP inspections and the expansion of an unprogrammed inspection under the NEP:

NAICS CODES ESTABLISHMENTS

311224*	Soybean and other oilseed processing
311313*	Beet sugar manufacturing
311314*	Cane sugar manufacturing
311412*	Frozen specialty food manufacturing
311421*	Fruit and vegetable canning
311511	Fluid milk manufacturing
311513	Cheese manufacturing
311514	Dry, condensed, and evaporated dairy product manufacturing
311611	Animal (except poultry) slaughtering
311612	Meat processed from carcasses
311613	Rendering and meat byproduct processing
311615	Poultry processing
311812	Commercial bakeries
311813	Frozen cakes, pies, and other pastries manufacturing
311942*	Spice and extract manufacturing

311991	Perishable prepared food manufacturing
311999	All other miscellaneous food manufacturing
312111*	Soft drink manufacturing
312112*	Bottled water manufacturing
321113	Sawmills
321114	Wood preservation
321211*	Hardwood veneer and plywood manufacturing
321212	Softwood veneer and plywood manufacturing
321214	Truss manufacturing
321911	Wood window and door manufacturing
321912	Cut stock, resawing lumber, and planing
321918	Other millwork (including flooring)
321991*	Manufactured home (mobile home) manufacturing

- 321992* Prefabricated wood building manufacturing
- 321999* All other miscellaneous wood product manufacturing
- 322211 Corrugated and solid fiber box manufacturing
- 322212 Folding paperboard box manufacturing
- 322219 Other paperboard container manufacturing
- 326121 Unlaminated plastics profile shape manufacturing
- 326122 Plastics pipe and pipe fitting manufacturing
- 326191 Plastics plumbing fixture manufacturing
- 326199 All other plastics product manufacturing
- 327331 Concrete block and brick manufacturing
- 327991* Cut stone and stone product manufacturing

- 331221 Rolled steel shape manufacturing
- 331314* Secondary smelting and alloying of aluminum
- 331492* Secondary smelting, refining, and alloying of nonferrous metal (except copper and aluminum)
- 331511* Iron foundries
- 331512* Steel investment foundries
- 331513* Steel foundries (except investment)
- 331523* Nonferrous metal die-casting foundries
- 331524* Aluminum foundries (except die-casting)
- 332111 Iron and steel forging
- 332112 Nonferrous forging
- 332117 Powder metallurgy part manufacturing
- 332119 Metal crown, closure, and other metal stamping (except automotive)

332311	Prefabricated metal building and component manufacturing
332312	Fabricated structural metal manufacturing
332313	Plate work manufacturing
332321	Metal window and door manufacturing
332322	Sheet metal work manufacturing
332323	Ornamental and architectural metal work manufacturing
332613*	Spring manufacturing
332618*	Other fabricated wire product manufacturing
332710	Machine Shops
332721	Precision turned product manufacturing
332722	Bolt, nut, screw, rivet, and washer manufacturing
332812*	Metal coating, engraving (except jewelry and silverware), and allied services to manufacturers

- 332813* Electroplating, plating, polishing, anodizing, and coloring
- 332991 Ball and roller bearing manufacturing
- 332992 Small arms ammunition manufacturing
- 332996 Fabricated pipe and pipe fitting manufacturing
- 332999 All other miscellaneous fabricated metal product manufacturing
- 333111* Farm machinery and equipment manufacturing
- 333241 Food product machinery manufacturing
- 333243 Sawmill, woodworking, and paper machinery manufacturing
- 333249 Other industrial machinery manufacturing
- 333414* Heating equipment (except warm air furnaces) manufacturing
- 333511 Industrial mold manufacturing

333514	Special die and tool, die set, jig, and fixture manufacturing
333515	Cutting tool and machine tool accessory manufacturing
333517	Machine tool manufacturing
335932*	Noncurrent-carrying wiring device manufacturing
336111*	Automobile manufacturing
336112*	Light truck and utility vehicle manufacturing
336211	Motor vehicle body manufacturing
336212	Truck trailer manufacturing
336214	Travel trailer and camper manufacturing
336611*	Ship building and repairing
336612*	Boat building
337121*	Upholstered household furniture manufacturing
337127*	Institutional furniture manufacturing

337211	Wood office furniture manufacturing
337212	Custom architectural woodwork and millwork manufacturing
337214	Office furniture (except wood) manufacturing
337215	Showcase, partition, shelving, and locker manufacturing

Note: NAICS with an asterisk ("") are targeted industries that were not included in the 2019 Amputations NEP.*

Notably, establishments inspected under the preceding NEP in the previous twenty-four months which did not report an amputation in those twenty-four months will be removed from the programmed inspection list. Additionally, establishments with ten or fewer employees that have their primary NAICS code listed on the [“Low-Hazard Industry Table” of the Appropriations Act Directive](#) are exempt from inspection. Remember, however, that Area Offices sometimes include exempted establishments by mistake or fail to remove them from their lists, so it is essential that you confirm your worksite has, in fact, been properly targeted for inspection before you consent to the walkaround portion of an inspection. Call timeout and contact counsel if you are not sure, because you cannot un-ring the bell once OSHA enters and observes alleged hazards.

When Do Inspections Begin?

Under the NEP Regional and Area Offices must conduct outreach activities intended to reach as many employers and stakeholders as is practicable for at least 90 days from the effective date of the program, with a special focus on industries that were not previously targeted by the 2019 Amputations NEP. Inspections can thus begin as soon as September 25, 2025. OSHA can of course inspect manufacturers in the meantime, in response to complaints, referrals, or reported events. Once programmed inspections begin, OSHA will conduct both programmed inspections and respond to unprogrammed events, such as complaints or incidents.

What Can Employers Expect: Focus Areas of Inspections

Amputations NEP inspections are broad in scope and can include all locations related to operating, servicing, maintaining, controlling of hazardous energy sources, and/or guarding all machinery and equipment that can potentially present amputation hazards to workers. Keep in mind that scope of the inspection may be expanded where there is evidence (e.g., injuries or illnesses recorded in both OSHA forms 300 and 301, employee statement, or “plain view” observations) that violative conditions may be found in other areas.

At the start of each inspection, the compliance officer(s) (CSHOs) conducting the inspection will verify the site’s

NAICS code to ensure that the site is covered by the NEP and not otherwise exempt from inspection. The CSHO should also verify with the employer whether any machinery, equipment, and/or work processes that could result in amputations is present in the workplace. In addition, the CSHO will review the employer's OSHA 300 logs looking for injuries that suggest machinery, equipment, and/or work processes exist that could result in amputations. The CSHOs will also review and evaluate the employer's LOTO program, including machine specific procedures, training provided to authorized, affected, and other employees, as well as the annual periodic inspections that employers much conduct of their energy control procedures.

In addition to reviewing the LOTO and machine guarding programs, the CSHOs will be expected to conduct a walk-around of the facility during which they will attempt to observe setup, regular operations of the machine, and any service or maintenance activity. Additionally, CSHO's will look for employee exposure to nip points, pinch points, shear points, cutting hazards, and guarding deficiencies.

What Should You Do Now?

Given the fact that LOTO and machine guarding are consistently among the Top 10 most frequently cited standards every year, manufacturers will likely receive one or more citations if (and when) they are selected for inspection under the NEP. Further raising the stakes, once an employer receives citations of either or both standards, they face the prospect of costly Repeat citations (\$165,514) if OSHA returns after a self-reported serious incident or employee complaint. Employers that receive a certain combination of Repeat and/or Willful LOTO/machine guarding violations may then be placed in OSHA's Severe Violator Enforcement Program (SVEP) as we explained in this [article](#). Indeed, given the [significant changes](#) OSHA announced in September 2022 to SVEP, it will now be even easier for OSHA to place employers in the program.

Faced with such potentially serious consequences, manufacturers should consider taking a closer look at the state of machine guarding in their facilities and thoroughly evaluating their LOTO programs, paying particular attention to their training, machine specific procedures, and periodic inspections. Even the most sophisticated employers can struggle, at times, with these standards and there are a number of mistakes that employers tend to make time and time again as we detailed in this [article](#). While certain employers may be fully capable of conducting effective self-audits, others may want to consider engaging a professional safety consultant with particular expertise in these areas. Employers concerned about what might be revealed in such an audit should work with counsel to conduct the audit under privilege. Whichever approach best suits you, be sure to act now before OSHA knocks on your door.

OSHA Inspection Masterclass

Prudent employers may also want to consider signing up for Conn Maciel's [OSHA Inspection Masterclass](#),  so they know what to do well-before OSHA arrives, mitigate the potential disruptions from an OSHA inspection, and avoid costly enforcement actions.

In conjunction with the masterclass, we deliver to your team an OSHA Inspection Resource Manual, which includes the slides from the training, a recording of the program, and the following tools and templates that we have developed:

- OSHA Inspection Toolkit
- Inspection Procedure Template
- Document Production Cover Letter Template
- Document Production Tracking Log
- Non-Supervisor Choice of Interview Representative Form

[Click here for more information](#) about our OSHA Inspection Masterclass.

We at Conn Maciel Carey LLP have extensive experience representing manufacturers and are here to help, so please [do not hesitate to reach out](#) with questions.