

Beware of Generic Lockout & De-Energization Procedures



[Occupational Health and Safety \(OHS\) regulations](#) require employers to implement [policies and procedures to](#) ensure that machinery and equipment is locked out and isolated from its source of energy before it undergoes servicing and repairs. Those lockout and de-energization procedures must also be **specific to the machine/equipment** being serviced. This isn't just a throw-in or clarification but an essential requirement that can spell the difference between life and death.

Generic Procedures Lead to Preventable Death

If you think we're exaggerating, just ask the family of journeyman GM millwright Daniel Smith who was changing the bushings on the load end lift of conveyor four in the body shop when the lift unexpectedly activated, rose up, and struck him squarely in the head – killing him instantly.

GM did have an energy control procedure containing all of the elements required by the Occupational Safety and Health Act (OSHA) standard, including methods to shut down machines, place and remove lockout or tagout devices, and verify the effectiveness of such devices and other energy control procedures. But as in this country, the U.S. OSHA standard requires that the procedure be "specific." OSHA contended the GM procedure was too generic and cited the company for a

willful violation.

GM Hit with \$692,000 Fine

After more than 10 years of litigation, the OSHA appeals tribunal upheld the citation, finding the three-page lockout procedure too “bare-bones,” especially given the complexity of the machines. The procedure lacked the details necessary “to effectively guide servicing and maintenance employees through the process of fully de-energizing and locking out the equipment,” the tribunal reasoned. For example, it told employees to use the “normal stopping procedure” for shutting down machines without explaining what that procedure was. The result was a \$692,000 fine.

Takeaway

What happened to Daniel Smith can also happen to one of your workers!

The GM tragedy is a reminder of the [need to comply with the OHS lockout and energy control requirements](#) of your jurisdiction by ensuring that that your own lockout [procedures](#) are clear and specific enough. Remember that machines are not one-size-fits-all. So, relying on generic procedures that purport to cover all of the machinery and equipment in your workplace is a recipe for fatal injuries and devastating financial penalties.