



NOV 12 2014

Mr. Butch Browning, President  
National Association of State Fire Marshals  
P.O.Box 671  
Cheyenne, WY 82003

Dear Mr. Browning:

I am writing this letter to inform you that the Occupational Safety and Health Administration (OSHA) has recently sent letters to some retailers where large crowds can be expected during the holiday season's major sales events. As you may know, a worker was trampled to death few years ago as shoppers rushed through a retailer's doors to take advantage of an after Thanksgiving Day "Black Friday" sales event.

The letters encourage retailers and store owners to take precautions to prevent worker injuries during the sales events or at other events where large crowds may gather. The letters also encourage them to use the safety guidelines provided in an OSHA Fact Sheet entitled, "Crowd Management Safety Guidelines for Retailers," in addition to their own procedures. A copy of the Fact Sheet is enclosed. In addition, retailers are reminded to maintain appropriate access to exit routes and ensure that exits are not blocked.

I am sure you share our concern over these issues and our goal to ensure that crowd management plans and proper emergency exit measures are in place as this season approaches. We appreciate any assistance on your part to further distribute this information to those within your association who can assist in minimizing any loss of lives or injuries during these holiday sales events. Our work together in this effort will help ensure that we can all have a safe and happy holiday season.

Thank you for your attention to this urgent worker safety matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "David Michaels".

David Michaels, PhD, MPH

Enclosure



# OSHA<sup>®</sup> FactSheet

## Crowd Management Safety Guidelines for Retailers

Crowd-related injuries can occur during special sales and promotional events. In 2008, a worker died at the opening of a “Black Friday” sale.

Under the *Occupational Safety and Health Act of 1970*, employers are responsible for providing their workers with safe and healthy workplaces. The Occupational Safety and Health Administration (OSHA) encourages employers to adopt effective safety and health management systems to identify and eliminate work-related hazards, including those caused by large crowds at retail sales events.

OSHA has prepared these guidelines to help employers and store owners avoid injuries during the holiday shopping season, or other events where large crowds may gather. Crowd management planning should begin in advance of events that are likely to draw large crowds, and crowd management, pre-event setup, and emergency situation management should be part of event planning. OSHA recommends that employers planning a large shopping event adopt a plan that includes the following elements.

### Planning

- Where large crowds are expected, hire additional staff as needed and have trained security or crowd management personnel or police officers on site.
- Create a detailed staffing plan that designates a location for each worker. Based on the size of the crowd expected, determine the number of workers that are needed in various locations to ensure the safety of the event (e.g., near the entrances and throughout the store).
- Ensure that workers are properly trained to manage the event.
- Contact local fire and police agencies to determine if the event site meets all public safety requirements, and ensure that all permits and licenses are obtained and that local emergency services, including the local police, fire department and hospital, are aware of the event.

- Designate a worker to contact local emergency responders if necessary.
- Designate a store manager to make key decisions as needed during the event.
- Provide legible and visible signs that describe entrance and exit locations, store opening times, and other important information such as the location of major sale items and restrooms.
- Prepare an emergency plan that addresses potential dangers facing workers, including overcrowding, crowd crushing, being struck by the crowd, violent acts and fire. Share emergency plan with all local public safety agencies.
- Train workers in crowd management procedures and the emergency plan. Provide them with an opportunity to practice the special event plan. Include local public safety agencies if appropriate.

### Pre-Event Setup:

- Set up barricades or rope lines for crowd management well in advance of customers arriving at the store.
- Make sure that barricades are set up so that the customers' line does not start right at the entrance to the store. This will allow for orderly crowd management entry and make it possible to divide crowds into small groups for the purpose of controlling entrance.
- Ensure that barricade lines have an adequate number of breaks and turns at regular intervals to reduce the risk of customers pushing from the rear and possibly crushing others, including workers.
- Designate workers to explain approach and entrance procedures to the arriving public, and direct them to lines or entrances.



- Make sure that outside personnel have radios or some other way to communicate with personnel inside the store and emergency responders.
- Consider using mechanisms such as numbered wristbands or tickets to provide the earlier-arriving customers with first access to sale items.
- Consider using Internet lottery for “hot” items.
- Locate sale items in different parts of the store to prevent overcrowding in one place.
- Locate shopping carts and other potential obstacles or projectiles inside the store and away from the entrance, not in the parking lot.
- If appropriate, provide public amenities including toilets, washbasins, water and shelter.
- Communicate updated information to customers waiting in line. Have signs and distribute pamphlets showing the location of entrances, and exits, store opening times and location of special sales items within the store.
- Shortly before opening, remind waiting crowds of the entrance process (i.e., limiting entry to small groups, redemption of numbered tickets, etc.).
- Staff entrances with uniformed guards, police or other authorized personnel.
- Use a public address system or bullhorns to manage the entering crowd and to communicate information or problems.
- Position security or crowd managers to the sides of entering (or exiting) public, not in the center of their path.
- Provide crowd and entry management measures at all entrances, including the ones not being used. If possible, use more than one entrance.
- When the store reaches maximum occupancy, do not allow additional customers to enter until the occupancy level drops.
- Provide a safe entrance for people with disabilities.

### During the Sales Event

- Provide a separate store entrance for staff. Provide door monitors there to prevent crowd entry.
- Make sure that all employees and crowd control personnel are aware that the doors are about to open.

### Emergency Situations

- Do not restrict egress, and do not block or lock exit doors.
- Know in advance who to call for emergency medical response.
- Keep first-aid kits and Automated External Defibrillators (AEDs) available, and have personnel trained in using AEDs and CPR onsite.
- Instruct employees, in the event of an emergency, to follow instructions from authorized first responders, regardless of company rules.

This is one in a series of informational fact sheets highlighting OSHA programs, policies or standards. It does not impose any new compliance requirements. For a comprehensive list of compliance requirements of OSHA standards or regulations, refer to Title 29 of the Code of Federal Regulations. This information will be made available to sensory-impaired individuals upon request. The voice phone is (202) 693-1999; teletypewriter (TTY) number: (877) 889-5627.

