



NON-GOVERNMENTAL ORGANIZATION AND BUSINESS ENTITY RESPONSE(S) TO REPORT

Section 5274 of the James M. Inhofe National Defense Authorization Act for Fiscal Year 2023, Pub. L. No. 117-263, amended the Inspector General Act of 1978, establishing new notification requirements for Offices of Inspectors General (OIG). OIGs are required by law to notify and provide an opportunity to respond, within 30 days of report publication, to any non-governmental organizations (NGO) or business entities that are specifically identified in non-investigative reports. The OIG has reviewed the following response(s) to ensure § 5274 compliance. Any classified or other non-public information, if contained within a response when submitted, has been redacted.

THE FOLLOWING WRITTEN RESPONSE(S) IS/ARE NOT AUTHORED OR PRODUCED IN ANY CAPACITY BY THE U.S. DEPARTMENT OF LABOR OFFICE OF INSPECTOR GENERAL. THE VIEWS AND STATEMENTS EXPRESSED HEREIN DO NOT REPRESENT THE OPINIONS, VIEWS, ENDORSEMENTS, OR POLICY POSITIONS OF OR BY THE OFFICE OF INSPECTOR GENERAL. EACH WRITTEN RESPONSE HAS BEEN ATTACHED TO THE OFFICE OF INSPECTOR GENERAL REPORT TO WHICH IT RELATES PURSUANT TO THE REQUIREMENTS OF § 5274 OF THE NATIONAL DEFENSE AUTHORIZATION ACT FOR FISCAL YEAR 2023. EACH RESPONSE THAT FOLLOWS WILL CLEARLY IDENTIFY THE NON-GOVERNMENTAL ORGANIZATION OR BUSINESS ENTITY RESPONSIBLE FOR THE CREATION AND SUBMISSION OF THE STATEMENTS EXPRESSED THEREIN.



80 M Street SE
Suite 700
Washington, DC 20003
Phone: 202.434.0999
www.walmart.com

October 27, 2023

The Honorable Larry D. Turner
Inspector General
U.S. Department of Labor
200 Constitution Avenue, NW
Room S-5502
Washington, D.C. 20210

Dear Mr. Turner,

I write in response to your letter dated September 28, 2023, regarding the U.S. Department of Labor Office of Inspector General (OIG) audit report titled *COVID-19: OSHA Needs to Do More to Address High Injury Rates of Warehouse Workers*. Pursuant to the James M. Inhofe National Defense Authorization Act for Fiscal Year 2023, Pub. L. No. 117-263, § 5274, Walmart would like this letter to be included alongside the final report.

We appreciate the opportunity to share information about our Occupational Safety and Health Administration (OSHA) injury and illness reporting related to our associates working in our distribution network. Our distribution operation is one of the largest in the world, servicing stores, clubs, and direct delivery to customers. In addition to our stores and distribution centers, we have also built e-commerce fulfillment centers that are capable of shipping and handling millions of items. Regardless of the format, we have a consistent record of reporting and do not differentiate between traditional distribution centers and those that service our online business when it comes to OSHA's injury and illness reporting.

Contrary to the comments on page 16, Walmart, in fact, reports both distribution and fulfillment centers under NAICS code 493 related to warehousing and storage. We are proud of our record of low rates of injury and illness incidents. Walmart's performance is significantly better than the industry across the relevant OSHA metrics -- Overall Incident Rate (OIR), Days Away, Restricted or Transferred (DART), and Lost Time Case Rate (LTCR).

We thank you for your leadership on this important issue. If you have any questions, please do not hesitate to reach out to me at [REDACTED] or to my colleague, Laura Siegrist, at [REDACTED]

Sincerely,

Bruce C. Harris
Vice President, Federal Government Affairs
Walmart Inc.