



## Manufacturing & Construction Equipment & Wisconsin's Child Labor Laws

Wisconsin's child labor laws prohibit the use of certain potentially hazardous equipment by minors under the age of 18. This document provides a list of equipment commonly used in manufacturing and construction jobs and explains when minors may use such equipment.

### Notes:

- ♦ **The list is not exhaustive.** If you have questions about a particular piece of equipment, please contact the Department's Equal Rights Division.
- ♦ Minors 15 and under may not be employed in "manufacturing, mining, or processing occupations." This includes occupations that require the performance of any duties in workrooms or workplaces where goods are manufactured, mined, or otherwise processed. See [Wis. Admin. Code § DWD 270.13\(13\)](#).
- ♦ **The Student Learner Exemption:** A "student learner" is a student of an accredited school who is employed on a part-time basis to obtain both scholastic credit and employment training under a bona fide written school-work training program agreement.
  - A student learner is permitted to do some work that is otherwise prohibited if the student learner is performing service within a bona fide school-work training program
    - sponsored by an accredited school
    - authorized and approved by
      - the state department of public instruction,
      - the technical college system board, or
      - the department's youth apprenticeship program.
  - Each school-work training agreement shall:
    - include the name of the student learner;
    - be signed by the parent, employer, and school principal;
    - be kept on file by both the school and the employer; and
    - shall provide all of the following:
      - That the work of the student learner in the occupation declared hazardous under ss. DWD 270.12 and 270.13 is **incidental** to the student learner's training, and shall be intermittent and only for short periods of time (i.e., for 5% or less of the total work hours);
      - direct and close supervision of a qualified and experienced person.
      - safety instructions will be given by the school and correlated by the employer with on-the-job training.
      - a schedule of organized and progressive work processes to be performed on the job.



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Type of Equipment	Okay under 16?	Okay 16 and over?	Okay for <u>Student Learners</u> ?	Comments
Acetylene torch	No	Yes	Yes	Okay for 16-17 year-olds; no restrictions.
Assembly, Hand	Yes	Yes	Yes	No restrictions.
Automatic Shape & Sand	No	Yes	Yes	Prohibited under 16; allowable under <a href="#">section DWD 270.14(3)</a> , the "student learner" exemption, assuming student meets all requirements therein. This includes Youth Apprentices.
CNC Router	No	Yes	Yes	(1) Okay for 16-17 year-olds when there is full automatic feed and ejection. (2) Okay for student learners.
Cleat bender, manual	Yes	Yes	Yes	Okay, but not on construction site under 16.
Cleat bender, power-driven	No	Yes	Yes	Prohibited under 16.
Deburring Machine	No	Yes	Yes	Prohibited under 16.
Demo Hammer	Yes	Yes	Yes	Not prohibited. However, note that demolition work is never allowed to those under 18 years of age. See <a href="#">§ DWD 270.12(28)</a> .
Drawer Clamp	Yes	Yes	Yes	Not prohibited.
Drill, Cordless; Drill, Radial	No	Yes	Yes	Okay for 16-17 year-olds; no restrictions.



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Drill Press	No	Yes	Yes	Okay for 16-17 year-olds. See <a href="#">§ DWD 270.13(15)(b)1</a> . Prohibited for younger minors.
Flanging machines (snaplock, pittsburg, pipe lock)	No	No	Yes	Prohibited generally (§ <a href="#">DWD 270.12(19)</a> ), allowable under <a href="#">§ DWD 270.14(3)</a> , the "student learner" exemption, assuming student meets all requirements therein. This includes Youth Apprentices.
Forklift	No	No	No	See <a href="#">§ DWD 270.12(12)</a> . The forklift is the piece of equipment most commonly involved in industrial injuries. No minor, including student learners, may use them under any circumstances.
Framing Clamp Table	No	Yes	Yes	Okay for 16-17 year-olds; no restrictions.
Grinder, Hand, Bench, or Table	No	Yes	Yes	Machinery listed under <a href="#">§ DWD 270.13(15)</a> , prohibited under 16.
Hammer drill	No	Yes	Yes	Machinery listed under <a href="#">§ DWD 270.13(15)</a> , prohibited under 16.
Hydraulic Press	No	Yes	Yes	Okay for 16-17 year-olds; no restrictions.
Impact guns; corded and cordless	No	Yes	Yes	Okay for 16-17 year-olds; no restrictions.



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Type of Equipment	Okay under 16?	Okay 16 and over?	Okay for <a href="#">Student Learners?</a>	Comments
Iron Worker	No	Yes/No	Yes	Prohibited generally as a metal-forming machine. Okay for 16-17 year-olds if equipped with full automatic feed and ejection. Allowable for student learners.
Jib Hoist	No	No	No	Prohibited under <a href="#">§ DWD 270.12(12)</a> . No student learner exception.
Laser Cutting Machine	No	Yes/No	Yes	The hazardous employments listed in the child labor regulations do not address laser equipment directly. The Division has long considered them to be analogous to some types of welding tools. Welding is permitted for minors 16 and over as long as lead is not used in the welding process. Given these considerations, there is nothing in the child labor law that would prohibit the use of laser equipment by a 16-17-year-old.
Laser, PRC	No	Yes/No	Yes	See above comments. Additionally, this piece of equipment must have automatic feed and ejection.
Lathe	No	Yes	Yes	See <a href="#">§ DWD 270.13(15)</a> .
Lift, walk behind	No	No	No	Hoists and hoisting apparatuses are prohibited with very few exceptions. See <a href="#">§ DWD 270.12(12)</a> .



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Overhead crane	No	No	No	Hoists and hoisting apparatuses are prohibited with very few exceptions. See <a href="#">§ DWD 270.12(12)</a> .
Packaging, hand	Yes	Yes	Yes	No restrictions. Note that minors under 16 cannot work in "manufacturing or processing" occupations. See <a href="#">§ DWD 270.13(13)</a> .
Painting	Yes	Yes	Yes	No restrictions.
Painting, Hand	Yes	Yes	Yes	No restrictions.
Parts washing machine	Yes	Yes	Yes	No restrictions. Care needs to be taken with liquids used to clean metal parts.
Pipe threader	No	Yes	Yes	Okay for 16-17; no restrictions.
Planer	No	No	Yes	Prohibited except for student learners.
Plasma, hand held tool	No	Yes	Yes	Okay for 16-17; no restrictions.
Plasma table, computerized	No	Yes	Yes	Okay for 16-17; no restrictions.
Portaband	No	No	Yes	Prohibited generally ( <a href="#">§ DWD 270.12(25)</a> ); Okay for student learners if all conditions are met. See <a href="#">§ DWD 270.14(3)</a> .



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Press Brake, regardless of size	No	No	Yes	Press brakes are named specifically as prohibited under <a href="#">§ DWD 270.12(19)</a> . Okay for student learners if all conditions are met. See <a href="#">§ DWD 270.14(3)</a> .
Pressure washer	No	Yes	Yes	See <a href="#">§ DWD 270.13(15)</a>
Punch Press, Rouselle / Tar-Pac 66 / Turret Press [Euromac]	No	Yes/No	Yes	Punch presses are prohibited for 16-17 year-old minors unless they have automatic feed and ejection, and they have guards to keep hands and fingers out. Okay for student learners. See <a href="#">§ DWD 270.12(19)</a> .
Router w/ table	No	Yes	Yes	Okay for 16-17; no restrictions.
Sander; belt sander; profile or edge sander	No	Yes	Yes	Okay for 16-17; no restrictions.
Saws: including double rip saw, single rip saw, up-cut chop saw, table saw, band saw, horizontal band saw, sawzall, skill saw, reciprocating saw, etc.	No	No	Yes	Prohibited generally, see <a href="#">§ DWD 270.12(25)</a> . Okay for student learners under conditions set forth in <a href="#">§ DWD 270.14(3)</a> .
Screw gun	No	Yes	Yes	Okay for 16-17; no restrictions.





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Shaper	No	Yes/No	Yes	(1) Okay for minors 16 and over when there is full automatic feed and ejection. (2) Okay for student learners.
Shears, including power shears, jump shears	No	No	Yes	Prohibited generally, see <a href="#">§ DWD 270.12(19)</a> . Okay for student learners under conditions set forth in <a href="#">§ DWD 270.14(3)</a>
Sheet metal brake	No	No	Yes	Prohibited generally, see <a href="#">§ DWD 270.12(19)</a> . Okay for student learners under conditions set forth in <a href="#">§ DWD 270.14(3)</a>
Skyjack	No	No	No	Hoists and hoisting apparatuses are prohibited to all minors. <a href="#">§ DWD 270.12(12)</a>
Tapering machine	Yes	Yes	Yes	No restrictions
Tenoner, Single End	No	Yes/No	Yes	(1) Okay for minors 16 and over when there is full automatic feed and ejection. (2) Okay for student learners under conditions set forth in <a href="#">§ DWD 270.14(3)</a>
Tube Bender	No	No	Yes	Prohibited generally, see <a href="#">§ DWD 270.12(19)</a> . Okay for student learners under conditions set forth in <a href="#">§ DWD 270.14(3)</a>



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Unique Door Machine	No	Yes/No	Yes	(1) Okay for minors 16 and over when there is full automatic feed and ejection. (2) Okay for student learners under conditions set forth in <a href="#">§ DWD 270.14(3)</a>
Vacuum	Yes	Yes	Yes	No restrictions
Welders (robotic, MIG, TIG, spot, wire feed, wire)	No	Yes	Yes	Welding okay per <a href="#">§ DWD 270.13(15)</a> .

*For additional information, please contact us.*

STATE OF WISCONSIN  
DEPARTMENT OF WORKFORCE DEVELOPMENT  
EQUAL RIGHTS DIVISION  
LABOR STANDARDS BUREAU

PO Box 8928  
Madison, WI 53708  
Phone: (608) 266-6860  
TTY: (608) 264-8752

819 N 6th St, Rm 723  
Milwaukee, WI 53203  
Phone: (414) 227-4384  
TTY: (414) 227-4081

E-mail: [erinfo@dwd.wisconsin.gov](mailto:erinfo@dwd.wisconsin.gov)

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Federal laws may also impact these issues. For information about federal law, contact the US Department of Labor, Wage and Hour Division, at (608) 441-5221.