

Neidhardt, Amalia@DIR

From: Smith, Steve C.@DIR
Sent: Thursday, October 27, 2016 3:40 PM
To: Carlos "BIG DOG" Campos
Cc: Neidhardt, Amalia@DIR
Subject: RE: DOSH & Cannabis Workers

Hi Carlos,

We appreciated your participation at the meeting and sending us this additional information. Amalia will be sending out updates on this project early next year. Until then, if you have further questions or information feel free to contact us.

Thanks,
Steve Smith
Cal/OSHA
916-574-2993

From: Carlos "BIG DOG" Campos [<mailto:ccampos@chasminc.consulting>]
Sent: Thursday, October 27, 2016 3:15 PM
To: Smith, Steve C.@DIR
Subject: DOSH & Cannabis Workers

Hello Steven,

I wanted to drop you a quick note thanking you and your colleagues for efforts your putting forth to understand this industry and its unique hazards and situations. I'd also take the opportunity to make the following points;

1) I'd like to make the recommendation of treating this very young industry as a "**High Hazard**" industry. Many may argue this recommendation saying that it is not but here is why I think it should be this way.

a] Because of the current FDIC rules these are strictly cash only businesses. This alone in my opinion at high risk due to the quantities of cash and product they maintain on site.

b] The sever lack of any type of "Safety Culture" history. Most industries are well aware of workers rights and responsibilities as well as those of the employer. These folks lack knowledge of the most basic safety and health programs.

c] Most of these folks feel very lucky, even privileged to be working in this industry and that creates easy victims for unequal pay, sexual harassment, abuse of the work-time clock, and even workplace violence.

d] Lastly, whether we're talking about a farm site or a testing lab or nursery or even dispensary, the work environment is in constant flux. Lights go up, they come down, trellises must be installed at different stages of plant growth, ladders are being used on uneven surfaces, water hoses run beside electrical cords in walkways, HAZCOM is non existent, Green houses get installed and taken down continually, propane tanks get installed and removed, etc...

2) Right now the **OSHA 10/30 hr Outreach training** is voluntary for all employers. Until this industry is a bit more mature I'd recommend making these specific training **BE MANDATORY**. Especially if they are in a supervisory position of any capacity.

3) The most important thing we need right now is **Education about the responsibilities of the employer and hazard awareness training for all workers in this industry**. From my personal experience, the rules we already have do and can apply to the cannabis and hemp industry but they do need to be made aware of the fact that the responsibility falls on the employer to do their due diligence, have a written IIPP and contact a consultant who can help guide them through the process.

In closing, I'd like to mention that we at CHASM, Inc. are currently working with Sonoma County Growers Alliance, the California Growers Association, the Americans for Safe Access, and even the California Cannabis Industry to raise awareness about these very things. We need your help though. So far everything is coming out of our pocket and we'd like to be among the first to apply for any grants that are being allotted for Outreach Education for these emerging industries.

Again, thank you for your time and energy. If there is anything I can help you with, please don't hesitate to call or email me.

Warm regards,

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Carlos "BIG DOG" Campos
Owner • CEO • CHST • OT
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