



July 15, 2022

Kevin Graulich, CAC, CIH, CSP
Senior Safety Engineer
Research & Standards Occupational Health Unit
Division of Occupational Safety & Health

SUBMITTED BY EMAIL TO: KGraulich@dir.ca.gov

RE: Workplace Violence Prevention in General Industry – Discussion Draft Revised May 17, 2022 Compared to Draft Dated 10/24/2018

Mr. Graulich:

On behalf of the many composites manufacturers in California, we are very grateful for a regulatory process that engages the regulated community in the crafting of a workable and reasonable rule. Our letter does not address the details of the draft workplace violence rule. We trust others representing a broad swath of industries in California will comment wisely on the details. Here, we'd like to make the overarching suggestion that Cal/OSHA separate high risk from low risk industries and manage them separately. Please accept this suggestion in the spirit of a mutual interest in safety for our employees and employers alike.

The American Composites Manufacturers Association represents companies using strong reinforcing fibers and durable and corrosion resistant polymers to make composite products like wind turbine blades, automotive components, structural members and reinforcing bars for highway bridges, utility poles, tub/shower for residential construction, recreational boats and hundreds of other products. Most composite manufacturers are smaller companies providing employment in cities and rural areas in California and across the country.

The original document launching the Division's advisory process, the January 12, 2017, advisory committee agenda, identified six industries with elevated rates of workplace violence.

- (1) Medical (some employees will be covered by 8 CCR § 3342)
- (2) Mental health (some employees will be covered by 8 CCR § 3342)
- (3) Teaching
- (4) Law enforcement
- (5) Retail sales – liquor stores, convenience stores, gas stations, nightclubs, and bars
- (6) Transportation – buses, taxi cabs, and other transportation occupations

The data used to support a need for this rule were statistics compiled by the US Department of Justice and the US Bureau of Labor Statistics. They show a general, strong, downward trend in workplace violence overall. The reported annual incidents drop to less than half in about 15 years.

As of the date of this letter, the January 12, 2017 agenda and the DOJ and BLS statistics could be found on the Division's webpage for this rulemaking (<http://www.dir.ca.gov/dosh/doshreg/Workplace-Violence-in-General-Industry/>).

Together, these data demonstrate a real divide between industries with increasing and those with decreasing levels of workplace violence. The differing needs on either side of this divide do not support the same level of regulatory burden.

Composites manufacturers are not among the six industries driving this regulation. On their behalf, we strongly urge the Division to separate high risk from low risk industries so as to allocate employers resources where they will net a real return of safety.

Thank you,
John Schweitzer

John Schweitzer
American Composites Manufacturers Association
734.604.9095 mobile