



California Rural Legal Assistance, Inc.

Rural Roots, Justice for All

Sent Via Email to Eric Berg @DIR – eberg@dir.ca.gov

July 11, 2025

Eric Berg, Deputy Chief
Health and Research and Standards
Cal/OSHA / Division of Occupational Safety and Health
1515 Clay Street, Suite 1901
Oakland, CA 94612

RE: Workplace Violence Prevention Standard – General Industry

Dear Mr. Berg:

Thank you for the opportunity to provide comments on the very important topic of the protection of all workers in all industries from workplace violence.

This comment letter is written on behalf of California Rural Legal Assistance, Inc., and its agricultural worker clients. Agricultural workers are often forced to work in hostile environments where their supervisors, managers, and at times even coworkers, constantly berate and bully them with verbal abuse.

Therefore, the focus of this comment letter is to prevail upon the Division to include in the definition of Workplace Violence the act of severe, persistent, and prolonged verbal abuse by supervisors, managers, and coworkers.

SEVERE, PERSISTENT, AND PROLONGED VERBAL ABUSE SHOULD BE INCLUDED IN THE DEFINITION OF WORKPLACE VIOLENCE

To be clear in this letter we are not talking about isolated incidents of raised voices or sporadic remarks spread out over several months or years. We are talking about severe, persistent, and prolonged patterns of egregious behavior that crosses the line into verbal abuse that is conducive to acts of violence.

Often supervisors and managers, being in a position of power, engage in workplace bullying, and unwarranted behavior or unjustified aggression intended to harass, coerce, demean, humiliate, intimidate, or threaten workers. Such airs of superiority manifest in various ways such as use of foul language, derogatory remarks, verbal abuse, emotional manipulation, and yes, even physical violence.



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Agricultural workers, like workers in other industries, are too frequently subjected to various forms of severe, persistent, and prolonged verbal abuse. Examples include:

1. Threats and Intimidation:

- Threats of job loss or retaliation: For instance, some agricultural workers have reported supervisors threatening to report them to immigration authorities if they complain or don't comply with demands.
- Intimidation tactics: This can involve yelling, aggressive gestures, or using derogatory language to create fear and maintain control.

2. Insults, Name-Calling, and Humiliation:

- Demeaning comments: Agricultural workers may face insults related to their work performance, background, or personal characteristics.
- Public humiliation: Being ridiculed or insulted in front of colleagues can be particularly damaging.

3. Harassment and Ridicule:

- Constant criticism or negative evaluations: This can undermine self-esteem and create a hostile work environment.
- Spreading rumors or gossiping: This type of abuse can damage a worker's reputation and create social isolation.

It's important to remember these are just a few examples, and severe, persistent, and prolonged verbal abuse can take many forms.

The effects of such abusive behavior on a worker can be long-lasting, leading to emotional and psychological trauma, including post-traumatic stress disorder. In addition, severe verbal abuse affects a person's ability to control their emotions. A work environment where workers are exposed to severe, persistent, and prolonged verbal abuse may result in violence not only originating from the supervisor or manager, but also from the worker who no longer can tolerate being the victim of such offensive and derogatory comments.

Addressing such severe, persistent, and prolonged abusive conduct in the workplace is essential for maintaining a safe and healthy work environment, one free from the threat of workplace violence.



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In closing, we appreciate your efforts in establishing a strong and comprehensive Workforce Violence Prevention Standard for General Industry and the opportunity to be a part of this process. Please direct any questions regarding this comment letter to David Limón Saldivar.

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Thank you for your time and consideration.

CALIFORNIA RURAL LEGAL ASSISTANCE, INC.

David Limón Saldivar
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