



March 30, 2018

To Whom it May Concern,

RE: Comments on Working Draft, Workplace Violence Prevention Programs

The Specialty Graphic Imaging Association, SGIA, representing those facilities engaged in producing a variety of products via either the screen printing or digital imaging technologies and the associated supplier base, submits the following comments on the Department of Industrial Relations' January 25, 2018 discussion draft for the development of general industry workplace violence prevention regulations. SGIA does not oppose the development of such regulations, however we do have concerns regarding the impact that the regulation will have on small business and how this regulation will be integrated into the existing injury and illness prevention requirements.

The current discussion draft does not address the impact on small business. There are significant requirements that will need to be met by covered businesses. Given the limited resources of small businesses, the regulation needs to be structured in such a manner to accommodate these limitations. Within the Injury and Illness Prevention Program regulations, there is recognition of small businesses, specifically those with less than 10 employees. This exception is included in Section 3203, (a) "every employer" as represented on the side by side comparison chart provided during the January 25, 2018 Advisory Meeting. Further, there is recognition within the Injury and Illness Program of high hazard and low hazard industry sectors. We have questions as to how this will be carried through to the development of Workplace Violence Prevention Program regulations.

Since not all workplaces are equal in their structure and experience with actual or potential incidents, the mandated requirements need to reflect the risk and resource limitations. As it appears that this new program will be implemented as part of this existing employer requirement, these issues need to be considered and addressed prior to moving forward to allow a seamless implementation strategy on the part of the business operating in California.

Thank you for the opportunity to provide comments on this draft and we look forward to working with the Advisory Council as this important regulatory initiative moves forward. Please contact me if you have any questions regarding these comments. I can be reached at marcik@sgia.org or at 703-359-1313.

Sincerely,
Marcia Y. Kinter

Vice President – Government & Business Information