



The Safety Gap: Violations and Workplace Incidents

When Enforcement Misses the Mark

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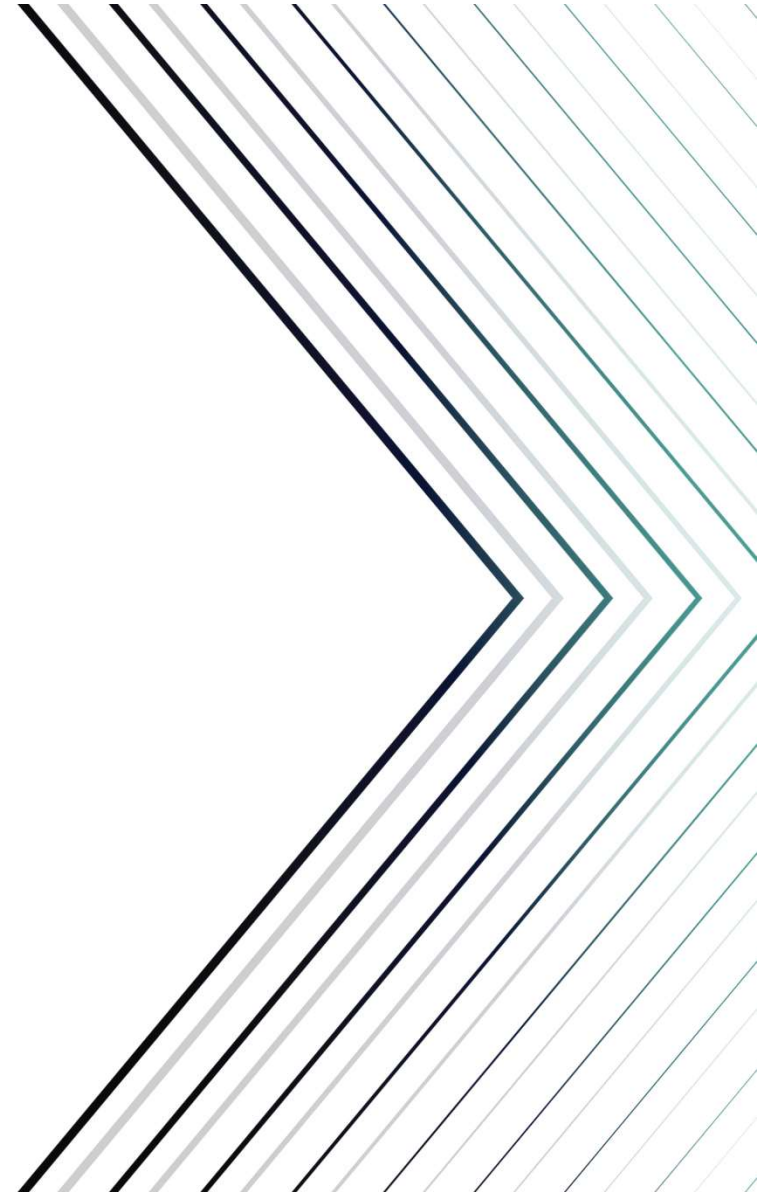
SPEAKER BIOS

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What we'll cover

- Injury Trends
- Common Citations
- Opportunities
- Compliance and Safety Gaps
- Summary

Learning Objectives

- Understand the disconnect between citations and actual workplace injuries.
- Recognize why compliance alone does not ensure worker protection.
- Learn how to analyze injury and incident data to uncover true risk factors.
- Identify proactive strategies to address hazards not fully covered by regulations.
- Strengthen safety programs by focusing on prevention rather than paperwork.

Fatalities in California Agriculture

In 2023, California recorded 45 fatal occupational injuries in the agriculture, forestry, fishing, and hunting sector—about 10% of all private-industry workplace fatalities in the state.

Of these, 24 occurred in crop production—including fruit, tree nut, and greenhouse sectors—while 15 were related to support activities and contractors (11 specific to FLCs)

Common Citations

Agriculture

1. Heat Illness Prevention (§3395)
2. Field Sanitation (§3457)
3. IIPP (§3203)
4. Agricultural Equipment Operation (§3441)
5. Reporting Fatalities (§342)
6. First Aid Kits (§3439)
7. Lockout/Tagout (§3314)
8. Industrial Trucks (forklifts) (§3650)
9. Machinery Guarding (§3328)
10. Portable Ladders (§3276)

A Little Perspective

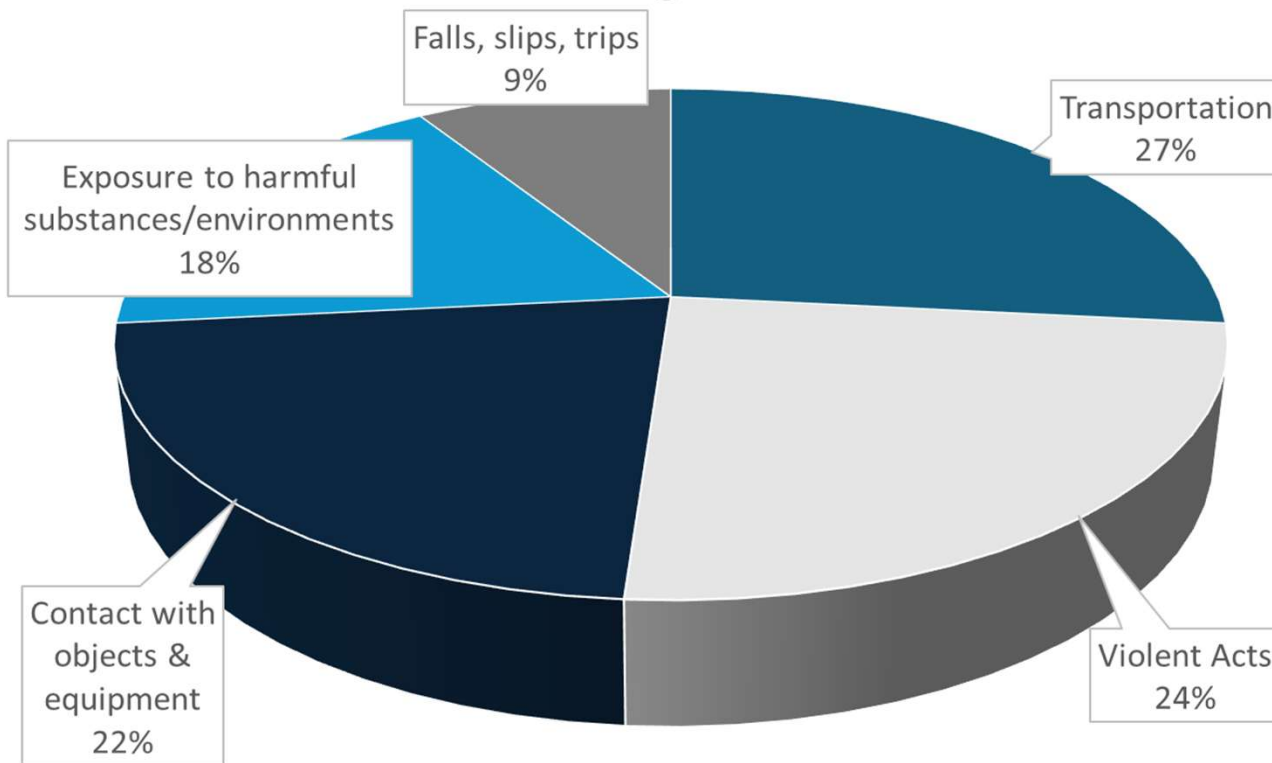
- 6,820 total CAL/OSHA inspections in 2023
 - 273 due to fatalities or catastrophic losses
- In 2023, there was only one inspection in Ag that resulted in over \$100K in penalties.
 - This was the WPV that occurred in Half Moon Bay, resulting in four employees dying.
- For all industries, after 3203 IIPP, 3395 Heat Illness was the second most frequently cited standard.

A Little Perspective

- Cal/OSHA issued 114 heat-related citations in 2023, with 32 of those being for outdoor heat illness prevention and 82 for indoor heat illness prevention.
- California confirmed outdoor heat illnesses averaged 67 per year, 2015-2018
- California confirmed outdoor heat fatalities averaged 1 per year for 2015-2018
- For 2021-2022 (two years), non-fatal cases related to heat illness in the United States were 4,910. Of those, 70 were related to agriculture.

What are the trends?

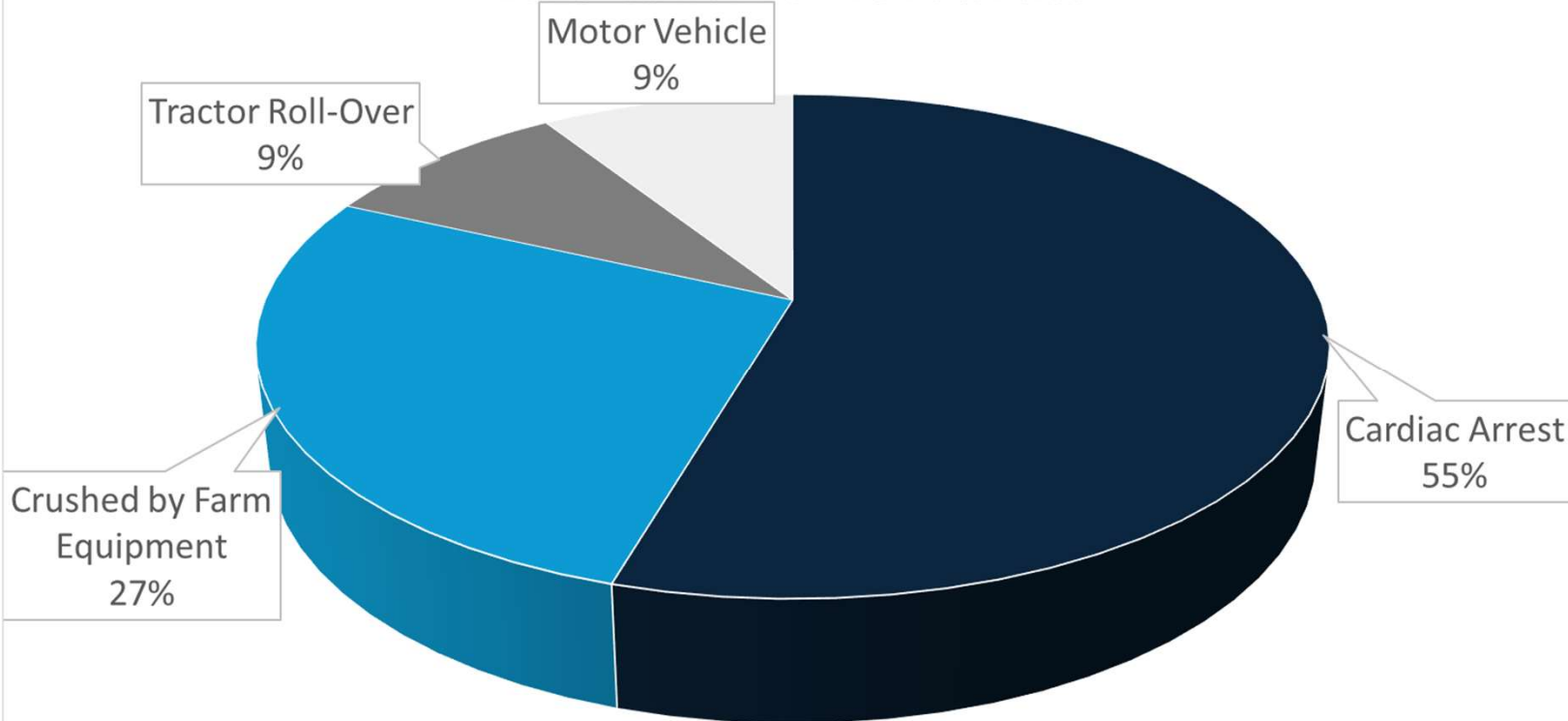
2023 California Agriculture Fatalities



Total ag fatalities
in CA : 45 (BLS
data as of
12/10/24

What are the trends for FLCs?

2023 California FLC Fatalities



FLC fatalities
in CA: 11
(OSHA data as
of 10/17/25)

Weak Alignment...or Low-Hanging Fruit

Field Sanitation

- For general health, even though not a direct cause of fatalities, it can play a part in reducing illness.

IIPP

- Addresses systemic safety—it's foundational but doesn't map to a specific injury type.

Reporting Fatalities

- Important for compliance and incident tracking but not directly linked to causes.

First Aid Kits

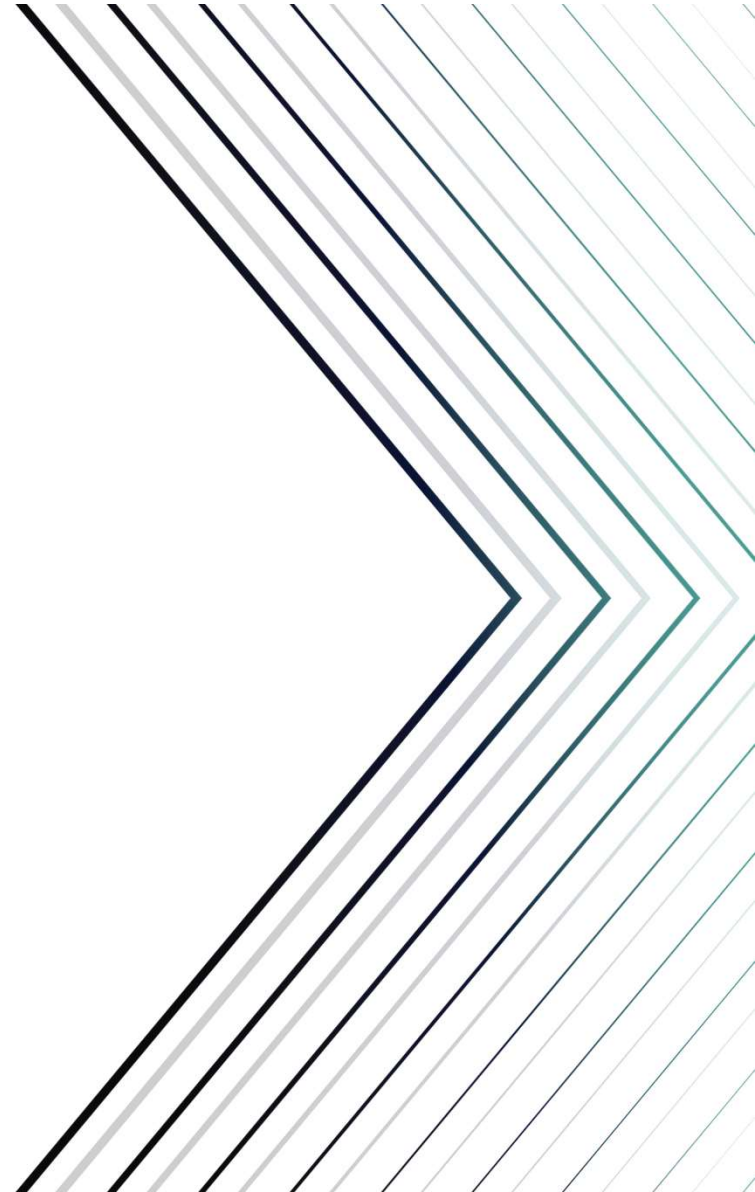
- Supports response after injury—not preventive of underlying causes.

Opportunities

Transportation	Tractor roll-overs, run-over by equipment, highway collisions, vehicle overturns (ATV)
Violent Acts	Co-workers, family members, general public, animals
Contact with objects & equipment	Crushed by, pulled into, struck-by, caught between
Exposure to harmful substances/environments	Heat, chemicals, sun, engulfment, drowning
Falls, slips, trips	Falls from ladders or farm equipment, slipping and tripping in field conditions

Let's break this down

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Transportation

Causes & Contributing Factors

- Human Factors
- Vehicle/Equipment Issues
- Environmental / Roadway Conditions
- Workplace & Operational Pressures

Violent Acts

Causes & Contributing Factors

- Human/Behavioral Factors
- Workplace & Operational Pressures
- External / Environmental Factors
- Organizational / Management Factors

Contact with Objects & Equipment

Causes & Contributing Factors

- Human/Behavioral Factors
- Equipment / Tool Issues
- Workplace Conditions
- Operational Pressures

Exposure to Harmful Substances / Environments

Causes & Contributing Factors

- Chemical Hazards
- Biological Hazards
- Environmental /
Physical Hazards
- Organizational /
Management Factors

Falls, Slips, Trips

Causes & Contributing Factors

- Human / Behavioral Factors
- Workplace Conditions
- Equipment & Structures
- Operational Pressures

Common Citations

Heat Illness Prevention

- Exposure to Harmful Substances / Environments

Agricultural Equipment Operation

- Contact with Objects & Equipment
- Transportation

Lockout/Tagout

- Contact with Objects & Equipment

Machinery Guarding

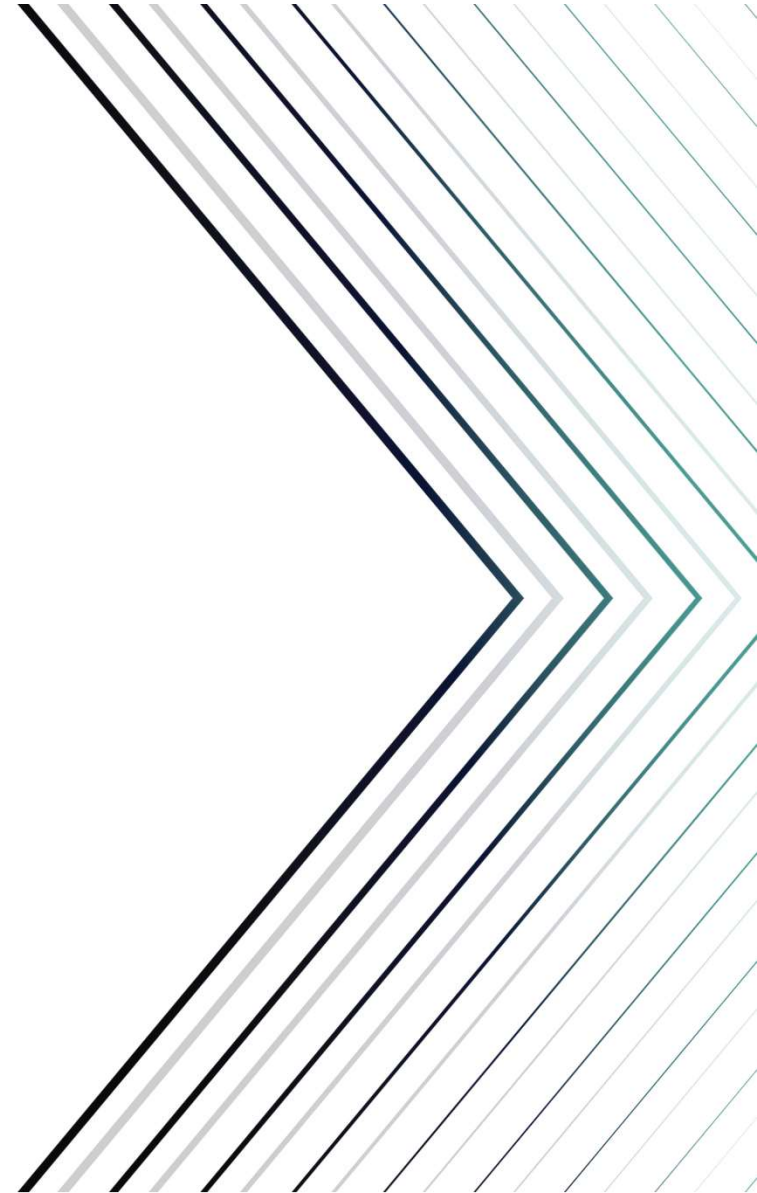
- Contact with Objects & Equipment

Portable ladders

- Falls, Slips, Trips

**The focus
should not be
on compliance!**

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Why the Focus Should Not Be On Compliance

1. Compliance Sets the Minimum Standard
2. Injuries and Fatalities Happen Even in “Compliant” Workplaces
3. Compliance is Reactive, Not Proactive
4. Compliance Alone Doesn’t Drive Safety Culture
5. Prevention is Better for Business

Bottom line: Compliance is the floor, not the ceiling. True prevention comes from a proactive safety culture that identifies and mitigates risks because every worker’s life matters — not because a regulation requires it.

Next Steps to Address Safety Program Gaps

1. Assess & Identify Risks
2. Prioritize High-Risk Areas
3. Strengthen Training & Communication
4. Build Safety Culture & Accountability
5. Improve Systems & Controls
6. Monitor, Measure & Adjust

Closing safety program gaps isn't about compliance—it's about protecting people, reducing risk, and strengthening operations.

Bottom Line

- Don't wait for a regulation or a compliance inspection to address safety
- Own your safety program and hold employees at all levels accountable
- Work with your partners

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THANK YOU



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