

## Take Action on Another Important Issue: Impact of Aluminum Tariffs on Printing Plates

The new “Section 232 Tariffs on Steel and Aluminum” were issued by President Trump on June 1. These tariffs apply to steel and aluminum imported from various countries, including those in the European Union. Because the high-quality aluminum used to produce lithographic printing plates is sourced from the EU and is generally not available from domestic manufacturers, our industry is hit hard by this tariff.

The reaction by suppliers in our industry—and the pain felt by PIA printer members—has been swift. Within the past three weeks the major suppliers of aluminum printing plates in the U.S. announced price increases and/or “surcharges” as pass-through costs to customers. All three suppliers pointed directly to the Section 232 tariff impact as a reason for these price increases, demonstrating the need for the entire supply chain to collectively advocate for a solution.

This negative impact was predictable. PIA President and CEO Michael Makin personally took the industry’s warning to top-level Department of Commerce officials in a meeting on June 20. He was informed that there was an application process available to printing equipment suppliers to request exclusions from this tariff; however, the 90-day process has been delayed by requests from nearly every U.S. industry sector using steel and aluminum inputs. The timing on when or if printing equipment suppliers will receive exclusions is now undefined.

### Take Action

- Congress must hear tangible examples of how the printing industry is being impacted by trade policy. If your company has been notified of printing plate price increases due to the Section 232 Tariffs on Steel and Aluminum, notify your U.S. Senators and U.S. Representative as soon as possible.
- A pre-written letter to submit to lawmakers on your company letterhead is available at <http://bit.ly/pialetter>. Please submit by fax or email.
- Contact information for U.S. Senators can be found at <http://bit.ly/contactursenate> and for U.S. Representatives at <http://bit.ly/contacturusrep>.
- For maximum impact, please email copies of your letters to Print Powers America at [printpowers@printing.org](mailto:printpowers@printing.org) so that we can directly advocate on your behalf.

Sharing the impact that Section 232 Tariffs on Steel and Aluminum has on your company is vital to help the Trump Administration and Congress understand the real-life impact of trade policy on the printing and graphic communications industry.

## Preventing Injuries through Lockout/Blockout

Failure to lockout and blockout machinery before working on it is a major cause of serious injury and death in California. Workers have been electrocuted; lost fingers, hands or arms; or suffered severe crushing injuries because machinery was inadvertently turned on while it was being maintained, repaired or adjusted. These injuries can be prevented by establishing and using an effective lockout/blockout program.

### *What is lockout/blockout?*

“Lockout/blockout” means that any energy source to a piece of machinery—whether it is electrical, hydraulic, mechanical, compressed air or any other source that might cause unexpected movement—is disengaged or blocked, and electrical sources are de-energized and LOCKED or positively sealed in the OFF position. This must be done BEFORE work on the machine begins.

Be aware there is a difference between turning off a machine and actually disengaging or de-energizing a piece of equipment. When you turn off a control switch, you are opening a circuit. There is still electrical energy at the switch, and a short in the switch or someone inadvertently turning on the machine may start the machine running again.

### *California's lockout/blockout regulations*

To prevent lockout/blockout accidents, General Industry Safety Order 3203 in Title 8 of the California Code of Regulations requires every employer to inaugurate and maintain an accident prevention program that includes but is not limited to the following:

- **A training program** designed to instruct employees in general safe work practices, plus specific instruction with regard to hazards unique to any job assignment.
- **Scheduled periodic inspections** to identify and correct any unsafe conditions and work practices that may be found. The employer must correct unsafe conditions and work practices found as a result of the required inspections.

### *Effective lockout/blockout programs*

To be effective, a lockout/blockout program should include:

- **A survey of the equipment** by responsible persons who are thoroughly familiar with its operation and associated hazards, in order to identify which machinery should be locked and blocked out.
- **Identification and labeling** of lockout devices.
- **Selection and purchase** of locks, tags and blocks.
- **A standard operating procedure** that is written and followed.

For more information about lockout/blockout requirements visit <http://bit.ly/locktaginfo>

## Practicing the Three Cs of Pricing in Print

Printing Industries of America's Management Alert series, from its Center for Print Economics and Management, provides PIA members with information on key management strategies, issues and practices.

This latest Management Alert is "Practicing the Three Cs of Pricing in Print." Of all the decisions that managers make on a day-to-day basis, pricing the product or service is typically one of the most difficult. Pricing too low can result in a loss. Pricing too high can result in lost customers and sales.

How do you determine the sweet spot of pricing? Making the decision even more complex is the fact that this sweet spot typically varies by customer, product, service and job. This is a particular issue in print, which has a custom manufacturing or "job shop" business-to-business sales model and little or no "standard" jobs. In an environment like this, what guidelines or tactics can help?

One common approach involves the pricing focus—i.e. pricing that is based on the cost side of the equation or pricing that is based on the demand side of the equation. Obviously, both are important. Additionally, marketing texts generally refer to the three Cs of pricing:

- **Costs** – Pricing decisions must start with knowing your costs.
- **Customer** – Pricing decisions must take account of differences in customer demands and price sensitivities. Economists refer to this as the price elasticity of demand.
- **Competition** – Pricing decisions must account for varying degrees of competition in terms of product and service substitutions, as well as the relative strength or weakness of your competition.

Each of these three Cs needs to be considered simultaneously in terms of their impact on each other.  
To read the full alert visit <http://bit.ly/piamanagealerts>.

## Good News: Some Common Sense HR Policies are No Longer Illegal

During the last year of the Obama administration the National Labor Relations Board (NLRB) issued a memorandum that many felt was a war on common sense. A broad range of “normal” human resources policies were to be “presumed illegal” because they could have a “chilling effect” on employees’ Section 7 organized labor rights.

In June the NLRB issued a new Memorandum that reverses course. The NLRB is now attempting to strike a balance between your right to maintain discipline and productivity in the workplace and your employees’ ability to exercise their Section 7 rights.

**Under these new guidelines, the following nine workplace rules are now “presumed lawful”:**

- **Civility rules** – You can require courteousness in the workplace.
- **No photography/no recording rules** – You can prohibit unauthorized photography and/or recording in the workplace. However, the ban should be on the actual recording, not on possessing a device, such as a cell phone, that can record.
- **On-the-job conduct rules** – You can prohibit insubordination and non-cooperation.
- **Disruptive behavior rules** – While you cannot ban strikes or walkouts, you can ban “fighting, roughhousing, horseplay, tomfoolery and other shenanigans,” and “yelling, profanity, hostile or angry tones, throwing things, slamming doors, waving arms or fists, verbal abuse, destruction of property, threats or outright violence.”
- **Information protection rules** – You can prohibit the disclosure of confidential, proprietary or customer information.
- **Anti-defamation and misrepresentation rules** – You can prohibit defamatory messages and/or misrepresenting your products, services or employees.
- **Rules about use of company’s intellectual property** – You can ban the unauthorized use of your logo or other intellectual property.
- **Rules about speaking for the company** – You can prohibit employees from speaking on behalf of your company without your permission.
- **Bans on disloyalty, nepotism or self-enrichment** – You can prohibit conduct that is disloyal, damaging to your company, competes with your company and/or interferes with an employee’s judgement concerning your company’s best interests.

The following policies are still unlawful:

- **Confidentiality rules** about wages, benefits and working conditions.
- **Rules against joining outside organizations** or voting on matters concerning your company.

**Action item:** Update your Employee Manual (again!!) to get these rules back on the books.

## New Expansion of Anti-Discrimination Regulations

As of July 1, 2018, the scope of the provisions of California's Fair Employment and Housing Act (FEHA) that prohibit discrimination and harassment on the basis of national origin have been expanded.

**The full definition of "national origin" now includes** the person's or their ancestors' actual or perceived:

1. Place of birth or geographic origin, national origin group or ethnicity (this was the original definition)
2. Physical, cultural or linguistic characteristics associated with a national origin group
3. Marriage to or association with persons of a national origin group
4. Tribal affiliation
5. Membership in or association with an organization identified with or seeking to promote the interests of a national origin group
6. Attendance or participation in schools, churches, temples, mosques or other religious institutions generally used by persons of a national origin group
7. Name that is associated with a national origin group

Furthermore, the regulations clarify that the term "national origin groups" includes "ethnic groups, geographic places of origin and countries that are not presently in existence." And height and weight requirements that create an adverse impact based on national origin are also prohibited, unless they are job-related and justified by business necessity.

### English-only rules are also affected

In addition, FEHA now states that except in cases of business necessity, the following are prohibited:

1. **Language restriction policies** that limit or prohibit the use of any language during work time are now illegal. When language restrictions are justified because you (the employer) can demonstrate that it's necessary for the safe and efficient operation of the business and to effectively fulfill the business purpose, and you can also demonstrate that there are no effective alternatives to the restriction, they must be narrowly tailored. Language restrictions are always prohibited during an employee's non-work time, such as during meal and rest breaks.
2. **Discrimination based on the individual's level of English proficiency**, unless English proficiency is required to effectively fulfill the job duties.
3. **Discrimination based on a person's accent**, unless you can show that the accent "interferes materially" with the employee's ability to effectively fulfill the job duties.

**Action item:** Update your policies to conform to these new regulations



## Common Mistakes that Job Interviewers Make

Hiring? There are many costs associated with bad hiring decisions, including loss of production, training and employment costs, greater pressure for skilled employees to make up for the employee's failings, higher unemployment costs, and wrongful terminations. Here are some tips for avoiding four common interviewing mistakes:

1. **Personal Bias** – The interviewer must be aware of their biases and how these biases may influence how they interpret information received or evaluated during or after the interview. If the interviewer's personal feelings interfere with their objectivity, someone else (a qualified second party) should perform an interview with the applicant.
2. **Halo Effect** – The interviewer must avoid being overly influenced by one area of strength or achievement in the applicant's background and letting this stop them from adequately exploring all areas of job-relevant background.
3. **Rationalization** – When receiving or evaluating information from applicants, the interviewer must avoid rationalizing their answers. The information should be recorded as stated by the applicant. If the interviewer does not have a clear meaning of an answer, they should ask further open-ended questions to gain understanding. The interviewer must not rationalize or surmise what the applicant might have meant in their response.
4. **Rushing the Interview** – The interviewer who rushes to complete, or does not allow adequate time to evaluate the applicant's background, makes many poor and costly business decisions in hiring new employees.