Western Occupational & Environmental Medical Association

WOEMA

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October 29, 2026

California Division of Occupational Safety and Health (Cal/OSHA)
Occupational Safety and Health Standards Board
Sacramento, California

Re: Support for October 22, 2026 Discussion Draft - Emergency Artificial Stone / Respirable Crystalline Silica Standard

Dear Cal/OSHA and Standards Board Members:

The Western Occupational and Environmental Medical Association (WOEMA) strongly supports the October 22, 2026 discussion draft addressing artificial stone containing 1.0% or more crystalline silica. In particular:

- **Product identification and enforcement are strengthened.** The new draft requires documentation for each SKU, including an SDS and laboratory analysis using X-ray diffraction from an accredited laboratory, and treats undocumented material as covered artificial stone at or above the threshold. It also clarifies record access and adds a narrow exception for sampling and analysis.
- **The definition of artificial stone is more precise.** The draft identifies specific exclusions for fired ceramic and porcelain, unprocessed natural stone slabs and panels, binder-free sintered stone, terrazzo, and specified concrete or cement-based slabs and panels. These distinctions should make the prohibition easier for employers, workers, suppliers, and enforcement personnel to understand and apply.

We urge Cal/OSHA and the Standards Board to move expeditiously to adopt the emergency standard. Every additional period of continued fabrication and installation creates avoidable opportunities for exposure to a dust that has already caused disabling and fatal disease among California workers. The proposed prohibition is a necessary, evidence-based, and preventable-disease intervention, and it closely reflects the action WOEMA requested in December 2025.

WOEMA appreciates the work of Cal/OSHA and the Standards Board on this urgent occupational health problem and stands ready to provide clinical, epidemiologic, and occupational-medicine expertise as the emergency rulemaking proceeds.

Sincerely,



Rosalie Banasiak, MD, FACOEM
Chair, Board of Directors
Western Occupational & Environmental Medical Association