Via Electronic Mail

Division of Occupational Safety and Health
California Department of Industrial Relations
Cal/OSHA

Re: A.St.A. Comments on Cal/OSHA's October 22, 2026 Discussion Draft

To Whom It May Concern:

The World-Wide Agglomerated Stone Manufacturers Association (A.St.A.) respectfully submits these comments on Cal/OSHA's October 22, 2026 Discussion Draft.

A.St.A. and its members share Cal/OSHA's commitment to protecting workers from respirable crystalline silica exposure and preventing silicosis. **However, A.St.A. remains opposed to the proposed standard and urges Cal/OSHA not to proceed with a product-based prohibition**. Regulation should focus on workplace practices including effective controls to prevent overexposure, not prohibition of certain products.

The revised draft singles out "artificial stone" (an inaccurate term which we oppose and is only used in this submission because it is the terminology present in Cal/OSHA's draft rule) for prohibition while permitting **other silica-containing materials proven to present similar exposure risks during fabrication**. A.St.A. urges Cal/OSHA to adopt a comprehensive, science-based approach focused on exposure and enforcement of the existing federal and state silica standards.

If Cal/OSHA nevertheless proceeds with the proposed standard, A.St.A. requests, at a minimum, the following revisions:

Laboratory testing should be based on product composition, not individual SKUs.

Testing every SKU separately would duplicate analyses for products with the same commercial name and composition that differ only in thickness, size, finish, or similar characteristics. One laboratory analysis should therefore cover all SKUs sharing the same commercial reference/name and composition.

A.St.A. proposes the following language:

> **Documentation shall include:**
> **(1) A Safety Data Sheet (SDS) in accordance with section 5194 for each Stock-Keeping Unit (SKU); and**
> **(2) A laboratory analysis for each group of SKUs sharing the same commercial reference/name and composition, using X-ray diffraction and performed by a laboratory accredited in accordance with section 5204, Appendix A., to be provided by the importer, manufacturer, distributor, supplier, or other source. A group of SKUs may include different thicknesses, format sizes, finishes, or other configurations that do not alter the product's composition.**

Required warning language.

The **proposed requirement** that employers characterize "artificial stone" containing crystalline silica as "dangerous to life and health" **is misleading to workers**. It improperly attributes the hazard

to the product itself, rather than to occupational exposure to respirable crystalline silica generated during fabrication activities. Moreover, by singling out "artificial stone," the warning incorrectly suggests to workers that unsafe fabrication and resultant silica overexposure generated from fabricating other materials is acceptable and not hazardous. A.St.A therefore requests that Cal/OSHA replace the proposed language with an **accurate, exposure-based warning** addressing the hazards of respirable crystalline silica generated during fabrication activities, **regardless of the material being fabricated**.

Respectfully submitted,

Beatrice Barbiero
Director

A.St.A. WORLD-WIDE *World-wide Agglomerated Stone Manufacturers Association*