

September 28, 2026

Dear friends, colleagues, and neighbors,

Silicosis is not new. It has been named, studied, and written into law for more than a century. What is new is how fast it is taking young, hard-working people in our trade. Behind every number on a public health dashboard is a fabricator, a family, and a shop. We carry that with us every day.

Across this industry, I hear the same two truths no matter who is in the room: our shops need licensing, and our workers need protection. Where we differ is how to get there. ISFA's answer is simple to say and hard to do: follow the law that already exists, and prove it.

California already has some of the strongest silica rules in the world. Section 5204 of Title 8 and SB 20 require effective wet methods and a ban on dry cutting, engineering controls, respiratory protection, housekeeping with no dry sweeping and no compressed air, exposure monitoring, medical surveillance, training, and a written exposure control plan. When those rules are followed, workers are protected. What we are experiencing, at its core, is a failure of compliance and enforcement: too many shops operating outside the law, too few inspectors to reach them, and no easy way for a customer, a supplier, or a worker to tell the difference.

Today, ISFA filed a petition asking the California Occupational Safety and Health Standards Board to adopt a new, free-standing regulation, proposed Section 5204.2, establishing a fabrication shop license and a Verified Compliance Pathway. Under it, an employer could fabricate covered material only while it:

- **Holds a license** issued by the State for each place of employment;
- **Passes an independent third-party compliance audit** at least every 12 months, conducted by a Recognized Audit Provider using ISO 45001 Lead Auditors;
- **Maintains workers' compensation coverage** for everyone who performs or supports fabrication, however they are classified;
- **Provides medical surveillance** at no cost to employees, and reports exposure monitoring results to the Division;
- **Designates at least two competent persons** at each establishment to check housekeeping and correct dust hazards during every shift; and
- **Stops fabricating immediately** after a failing audit result, failing to report or an Order Prohibiting Use, until the correction is verified.

"Covered material" means every countertop and surface material: engineered stone, natural stone, and everything else, including materials not yet on the market. The proposed section stands alongside Section 5204 and does not amend or weaken it. It is not intended to harm anyone who makes or sells these materials. Our goal is industry consensus, and we are asking for it in the open.

The language in the petition was built on real groundwork. As the American Countertop Manufacturers Council (ACMC) organized itself and put its policies and procedures in writing, it produced the definition of a countertop and surface fabrication business and the reference list of recognized standards for each material that the proposed section relies on. That structure is still adapting as we learn, and we still have a lot of work to do.

To show the Board what the Verified Compliance Pathway looks like in real shops, we built the Fabrication Shop Auditor Program, the six-month Third-Party Independent Inspection Feasibility Program described in our petition. Independent ISO 45001 Lead Auditors visit shops, audit them against Section 5204, SB 20 and the subject matter in the proposed regulation, and issue a clear pass or fail. Shops that pass are listed on a public registry. Shops that fall short receive written corrective actions, and the auditor verifies the correction. Each audit has been held to \$5,000 and is paid for through industry audit grants, not your crew's paycheck. A passing audit does not replace any legal requirement.

We are starting in California, with a goal of 300 shops, members and non-members on identical terms. We have invited the Division to review the study protocol and observe audits, and an interim report at month 3 and a six-month feasibility report will go to the Board, the Division and the Emergency Silica Advisory Committee. The structure is built to work anywhere. Our network of more than 1,100 ISO 45001 auditors lets shops in every state take part now. Only California shop data will be reported to California regulators, and results from other states will show how this approach performs across the country. As an industry, we need to get ready.

Let me be clear what this program is not. It is not a license. Only government can grant that, which is why we have asked the Board to create one, and why we are working on a bipartisan basis toward a federal Fabrication Shop License. It does not replace Cal/OSHA inspections. It does not declare any product safe. It is a bridge: a way to verify, today, that the law is being followed while licensing authority is built.

We are asking for your help in four ways, all at CountertopLicensing.org:

- **Comment on the draft regulatory language by November 13, 2026.** A fillable template quotes each of our eight requests to the Board, so you can respond in your own words, including where you disagree.
- **Register your shop for an audit,** in California or anywhere else in the country.
- **Fund an audit.** Manufacturers, importers, distributors, and fabricators, or any interested party can put grant dollars directly into verified worker protection. Funders do not choose which shops are audited and see only combined, de-identified results.
- **Bring the science and the medicine.** We are collecting evidence for the Cal/OSHA process through November 13, including evidence that disagrees with us, and will file all of it with the Board unedited, with a neutral summary. We are also issuing an open call to the medical community: after a hundred years, workers need more than prevention. They need research into treatment and reversal.

ISFA has asked to present the petition at the Board's November 19, 2026 meeting, together with every comment and submission we receive.

Some will disagree with our approach. That is fine; disagreement is how good policy gets made. What we will not do is stop. The fabricators who cut, polish, and install the surfaces in our kitchens, hospitals, and schools deserve an industry that protects them and a system that rewards the shops that do it right.

Thank you for reading, for commenting, and for standing with the worker.

With respect and resolve,

Laurie Weber

Chief Executive Officer

International Surface Fabricators Association