

# WORKSAFE!

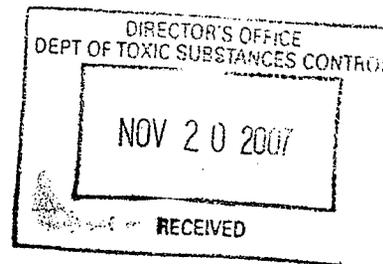
**A California Coalition for Worker Occupational Safety & Health Protection**

November 16, 2007

Maureen F. Gorsen, Director  
Department of Toxic Substances Control  
P.O. Box 806  
Sacramento, CA 95812-0806

Re: Green Chemistry Initiative

Dear Director Gorsen,



Worksafe is a California based non-profit organization dedicated to promoting occupational safety and health through education, training, advocacy, technical and legal assistance. We focus on eliminating all types of workplace hazards and also on eliminating workplace-created toxic hazards that impact at-risk communities in California. We also provide technical assistance in the area of workers' compensation to legal services programs in California to assist low-wage injured workers who are not able to secure a private attorney to assist them with problems arising out of a workplace injury.

The issues faced by workers dealing with toxic chemicals are serious and long-overdue to be addressed comprehensively. Because of WORKSAFE's commitment to this goal, our organization is a member of CHANGE, Californians for a Healthy and Green Economy, and we are a signatory on the letter sent to you on the Green Chemistry Initiative on behalf of CHANGE.

We wanted to take this opportunity to underscore the importance for California working people of meaningful chemical policy reform.

Occupational disease in California disables thousands of workers every year. Much of that disease is caused by chronic exposure to toxics at work, especially exposures to chemicals known to the State of California to cause cancer.

The economic impact of each such disability is enormous: medical costs, lost earnings, lost productivity. Creating incentives on the front end to protect workers from these risks is essential, both for worker health and as sound environmental and economic policy.

Preventing these disabling diseases is a complex matter, but it surely includes lowering permissible exposure limits for known carcinogens while working aggressively to develop truly safe alternatives. Not only will this step protect working people, but it will reduce the overall environmental burden of toxics coming from industrial sources.

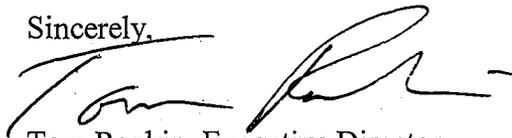
Equally urgent is lowering permissible exposure limits for known developmental toxicants present in California workplaces. Here too, the cost of birth defects is enormous and prevention of even a fraction through better protection of workers of child-bearing age is both sound environmental and economic policy. In The Cost of Birth Defects (1992), Waitzman estimated that the cost of providing lifetime care for the children born in the United States in a single year with major malformations was a whopping \$8

billion dollars. While the costs associated with medical care and educational services have skyrocketed since the book was written 15 years ago, the incidence of birth defects in the population has not gone down. Thus, the cost of caring for those with birth defects has multiplied since 1992. If we could prevent even 5% of major birth defects through real protection of workers of child-bearing age, the annual cost savings, not to mention the savings in human suffering, in California would be remarkable.

The Green Chemistry Initiative has the potential to confront these health problems head on and pro-actively by embracing a new approach to chemicals policy. Such an approach must acknowledge the failures of the current regulatory system and the need for a robust framework for evaluating and eliminating harmful chemicals from the market.

On behalf of Worksafe we look forward to collaborative efforts to accomplish this important objective for ensuring the health and productivity of California workers.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Rankin", written in a cursive style.

Tom Rankin, Executive Director