

# Regulatory Affairs

2019-2020

## CA GOVERNOR'S OFFICE

- [Letter to Governor Gavin Newsom re: CRA's Concerns Regarding the New COVID Tiered System 08.31.20 \(COVID-19 response\)](#)
- [Letter to Governor Gavin Newsom, Lieutenant Governor Eleni Kounalakis and the Legislature re: West Coast Ports 7.13.20 \(COVID-19 response\)](#)
- [Letter to Governor re: Proposed Executive Order Impacting Workers' Compensation Claims 4.20.20 \(COVID-10 response\)](#)
- [Letter to Governor re: Request for Litigation Immunity 4.17.20 \(COVID-19 response\)](#)
- [Letter to Governor re: CRA and Other Business Leaders Stand Ready to Work with the New "Economic Revitalization Team" 4.16.20 \(COVID-19 response\)](#)
- [Letter to Governor re: Request for Suspension of Pending Rulemaking 4.15.20 \(COVID-19 response\)](#)
- [Letter to Governor re: request to direct all state agencies to postpone near-term rulemaking and related deadlines to allow reasonable period of time for meaningful public participation in decision making processes 4.10.20 \(COVID 19 response\)](#)
- [Letter to Governor re: Retailers helping protect consumers outlining proactive measures essential members of CRA are taking to protect associates and consumers during the COVID-19 crisis 4.08.20 \(COVID-19 response\)](#)
- [Letter to Governor Newsom, Pro Tem Atkins and Speaker Rendon re: response to CA Labor Federation 4.07.20 \(COVID-19 response\)](#)
- [Letter to Governor re: Request Executive Order Partially Suspending Revenue and Taxation Code Sections 2618 and 4103 4.06.20 \(COVID-19 response\)](#)
- [Letter to Governor re: Request for Relief To Create Flexible Work Hours for Telecommuting and Reduce Liability Risks 04.01.20 \(COVID-19 response\)](#)
- [Letter to Governor re: Greater clarification for non-essential retailers to continue online sales and have option to offer curbside pick up at brick and mortar stores 3.26.20 \(COVID-19 response\)](#)
- [CRA and CA Grocers Association Joint Letter to Governor re: CRV take back and consumer reusable bags in retail stores 3.25.20 \(COVID-19 response\)](#)
- [CRA, CA Hotel and Lodging Association and California Restaurant Association Joint Letter to Governor re: Business Stimulus Recommendations to support the tourism industry 3.20.20 \(COVID-19 response\)](#)

- [Letter to Governor re: Retail Distribution Centers – State Clarification on Operation 3.19.20 \(COVID-19 response\)](#)

## CA ATTORNEY GENERAL'S OFFICE

- [Letter to AG re: Request for Temporary Forbearance from CCPA Enforcement 3.20.20 \(COVID-19 response\)](#)
- [Letter to AG re: Response to Second Set of Modifications to CCPA Regulations 2.25.20](#)
- [Letter to AG re: CCPA proposed CCPA regulations](#)
- [Letter to AG re: revised CCPA proposed regulations](#)

## CAL/OSHA

- [Letter to Office of Administrative Law re: COVID-19 Prevention Emergency Regulation \(OAL File Number 2020-1120-01E\) 11.25.20 \(COVID-19 Response\)](#)
- [Letter to Occupational Safety and Health Standards Board re: Draft COVID-19 Emergency Standard, Released November 12, 2020 11.18.20 \(COVID-19 response\)](#)
- [Updated Letter to Division of Occupational Safety and Health re: COVID-19 Emergency Standard Draft Regulation 10.13.20](#)
- [Letter requesting Cal/OSHA rescind and/or revise the guidance to comport fully with the requirements of federal OSHA recordkeeping regulations - 07.10.20](#)
- [Updated Comment Letter re: Proposed Permanent Regulations on Protection from Wildfire Smoke - 06.12.20 \(COVID-19 response\)](#)
- [Comment Letter re: Proposed Permanent Regulations on Protection from Wildfire Smoke - 5.21.20 \(COVID-19 response\)](#)
- [Comment Letter re: Emergency Regulations re Wildfire Smoke - 4.26.19](#)
- [Add 1 Comment Letter re Emergency Regulations re Wildfire Smoke - 5.10.19](#)
- [Letter to Division of Occupational Safety and Health \(Cal/OSHA\) re: Permanent Regulation regarding Wildfire Smoke Protections](#)
- [CalSavers Retirement Savings Program Comments and testimony 4.15.19](#)

## CA DEPARTMENT OF ALCOHOLIC BEVERAGE CONTROL

- [Letter to ABC re: Comments on Proposed AED: Emergency Decision Procedures \(Title 4, Section 147\) 5.21.20 \(COVID-19 response\)](#)

## CA DEPARTMENT OF CONSUMER AFFAIRS

- [Letter to DCA re: Remove Remaining COVID-19 Testing Barriers on Pharmacists to Advance Testing Ramp-up and Re-opening of State 4.23.20 \(COVID-19 response\)](#)
- [Letter to DCA re: Pharmacy Law Waivers 4.22.20 \(COVID-19 response\)](#)

## CA DEPARTMENT OF INDUSTRIAL RELATIONS

- [DRAFT Letter to Labor and Workforce Development Agency Secretary re: Standard Regulatory Impact Assessment \(SRIA\) on new Elevator Safety Orders \(letter finalization and distribution pending\)](#)
- [DLSE Regs Enforcement of Client Employer Liability under Labor Code Section](#)

## CA OEHHA/PROPOSITION 65

- [Letter to OEHHA re: Meeting request for the removal of Prop.65 Warnings for Acrylamide](#)
- [Letter to OEHHA re: November 4 Comments Regarding CIC Consideration of Acetaminophen](#)
- [Letter to OHEEA re: October 4, 2019 Revised Proposed Modifications to Title 27, Article 6 of the California Code of Regulations, Proposition 65 Clear and Reasonable Warnings, Section 25600.2](#)
- [Draft and Confidential Coalition Letter to OEHHA re Cross Facility Avg](#)
- **Letters to Office of Environmental Health Hazard Assessment (OEHHA) Re: Notice of Proposed Proposition 65 Rulemaking, Title 27, Cal Code of Regs, Section 25821 (a) and (c):**
- 1.) [12-3-2018 Coalition Comment Letter on Amendments to Section 25821\(a\) and \(c\)\(2\).pdf](#)
- 2.) [ATTACHMENT - Exponent Comments on Proposed Amendments to Section 25821\(a\) and \(c\)](#)
- 3.) [Comments re Proposed Amendments on Calculating Intake by Average Consumer of a Product](#)
- **Proposition 65 Clearinghouse Presentations:**
- ["Warnings - What's Working, What's Not"](#)
- ["From Raw Materials to the Store's Shelf - How Can You Be Sure You're Compliant?"](#)
- ["What's New with TSCA and How Does It Intersect with California's Chemical Regulations?"](#)
- ["Pitfalls to Avoid When Testing Products of Relying on Previous Consent Judgments"](#)
- ["New Chemical Listings - How to Make Sure Your Company Stays Compliant"](#)

- ["Prop. 65 Enforcement - Ethical and Legal Responsibilities for Plaintiff and Defense Attorneys"](#)

## CA ENERGY COMMISSION

- [Letter to CEC re: Proposed regulations for landscape irrigation controllers \(17-AAER-10\)](#)
- [Letter to CEC re: Docket Number 19-DECARB-01: AB 3232 Commissioner Workshop on Building Decarbonization](#)
- [Letter to CA Energy Commission re: Comments on Docket # 19-AAER-04, Title 20 Requirements for Portable Luminaires/General Service Lamps - Adoption of Federal Standard](#)

## CA JUDICIAL COUNCIL

- [Letter to Judicial Council re: Support for Amending Emergency Rule No. 9 as Provided in SP20-01wa 05.08.20 \(COVID-19 Response\)](#)

## CA AIR RESOURCES BOARD

- [Letter to CARB re: request an immediate pause to Transport Refrigeration Unit Regulation Development](#)

## CALRECYCLE

- [Letter to CalRecycle re: Revised Proposed Regulations, Sustainable Packaging for the State of California Act of 2018 \(SB 1335 10.20.20\)](#)
- [Letter to CalRecycle re: Proposed Regulations, Approval Process for Food Service Packaging Used at State Facilities 05.21.20](#)
- [CRA, National Association of Chain Drug Stores and California Pharmacists Association Letter to CalRecycle re: Comments Regarding Proposed Regulations. Article 4. Pharmaceutical and Sharps Stewardship Program 2.11.20 \(Draft\)](#)

## CA WATER RESOURCES CONTROL BOARD

- [Comments on the Proposed Definition for "Microplastics in Drinking Water" Under California Health and Safety Code § 116376 4.24.20](#)

## FEDERAL

- [CRA Joins COVID Relief Now Coalition Letter to Speaker Pelosi, Leader McConnell, Leader Schumer and Leader McCarthy urging Congressional leaders to reach a bipartisan deal on legislation to prevent catastrophic economic harm that would result if Congress does not pass additional emergency relief before adjourning for the election 9.30.20 \(COVID-19 Response\)](#)
- [CRA Joins Coalition Letter to Members of Congress Calling for Passage of the Timely, Targeted and Temporary COVID-19 liability Protections Set Forth in S. 4317, the "SAFE TO WORK Act" 7.30.20.20 \(COVID-19 response\)](#)
- [CRA Joins Broad Coalition Requesting Congress to Provide Liability Relief In Next Stimulus Package 7.20.20 \(COVID-19 response\)](#)
- [CRA and 89 other trade associations nationwide Joint Letter to President re: advocating on behalf of the retail industry and economic stimulus 3.21.20 \(COVID-19 response\)](#)
- [National Association of Chain Drug Stores \(NACDS\) Letter to the United States Pharmacopeia \(USP\) Re: Request for Confirmation and Clarification that Prescription Flavoring is not Compounding](#)

## LOCAL

- [Letter to Los Angeles County Board of Supervisors re: Health Councils Proposal 9.25.20 \(COVID-19 Response\)](#)
- [Letter to Local Officials re: Face Covering Orders for store customers 5.05.20 \(COVID-19 Response\)](#)
- [Letter to Southern CA Assn of Governments \(SCAG\) re: Request for Postponement of SCAG's Final "Connect SoCal" Plan \(2020-2045 Regional Transportation Plan/Sustainable Communities Strategy\) and the Program Environmental Impact Report \(PEIR\) 05.04.20 \(COVID-19 Response\)](#)
- [Letter to California League of Cities re: request to share with their membership the policy request for all local governments to mirror the Governor's executive order by temporarily suspending the carryout bag law for at least 60-days regardless if the law is grandfathered in \(in effect before January 1, 2015\) 4.28.20 \(COVID-19 response\)](#)
- [Letter to LA County Board of Supervisors re: paid sick leave, right of recall and worker retention ordinances moved by Supervisors Hilda Solis and Janice Hahn at the March 31 LA County Board of Supervisors meeting 4.10.20 \(COVID-19 response\)](#)
- [Letter to Los Angeles City Council Re: Opposition to Worker Retention" and "Right of Recall" ordinance \(Council File: 20-0147-s15\) 3.25.20 \(COVID-19 response\)](#)
- [Letter to City of San Francisco re: Suspension of Provisions of San Francisco's Formula Retail Employees Ordinances 3.23.20 \(COVID-19 response\)](#)

- [Letter to City and County Leaders Statewide re: Retail Distribution Centers – Clarification on Local Operation 3.18.20 \(COVID-19 response\)](#)
- [Letter to Los Angeles City Council Requesting requesting amendments to the Bureau of Contract Administration’s “Fair Work Week”](#)
- [Letter to City of San Francisco Requesting Suspension of Provisions of San Francisco’s Formula Retail Employees Ordinances \(Predictive Scheduling\)](#)

## OTHER ISSUES

- [Single-Use Plastic Straws – Statewide Law and San Francisco Ordinance](#)