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*Assembly of the Academic Senate, Academic Council*  
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**JOSEPH P. MULLINIX, SENIOR VICE PRESIDENT  
OFFICE OF BUSINESS AND FINANCE**

**Re: Policy on University Management of Health, Safety and the Environment, and draft  
Guiding Principles to Implement the University of California Policy on Health,  
Safety and the Environment**

Dear Joe:

The Academic Council has completed its review of the Policy on University Management of Health, Safety and the Environment, and the draft Guiding Principles for its implementation. The chief concern expressed by senate reviewers was that a policy such as this should be crafted to the needs of a university research environment and not inhibit the institution's ability to be productive or function effectively.

For example, the third paragraph of the preamble, where it states that the goals of the policy are for the University to have "zero injuries or illnesses, zero environment incidents, and zero property losses or damage," was found to be particularly troubling. Reviewers saw these goals as not only unrealistic but also as a potential impediment to the conduct of research. They strongly recommended that the goals focus instead on responsible risk management and use of best practices.

Other specific recommendations were:

- There should be an explicit statement in Component 1 that holds contractors to the same high standards as University personnel instead of leaving that to the terms of the contract.
- Under Component 2: Guiding Principles, more clarification is needed on the legal responsibility of supervisors for EH&S workplace violations.
- Again under Component 2: Guiding Principle 9 - Obtaining Authorization Prior to Conducting an Activity, a procedure should also be included on how to identify situations where authorization may be needed before conducting an activity.
- The policy neglects to designate the responsibility for those students who are not functioning as employees.

Concerns were also expressed about this policy being an unfunded mandate since its implementation will require a significant commitment in time for training, documentation, and record-keeping, particularly in the research laboratory setting. Without support for these activities, time for research and other academic endeavors will be eroded. Moreover, costs for safety training and documentation cannot be supported by extramural funds and sponsored projects, as these costs are regarded by funding agencies as part of overhead.

Finally, the reviewers were in general agreement that the Systemwide EH&S Leadership Group should be a joint administration-faculty body responsible for guiding and assessing the EH&S program rather than having the faculty serve only in an advisory capacity. With that in mind, the Academic Council would be pleased to work with you in getting senate representation on the Leadership Group.

Thank you for giving the Academic Council the opportunity to review these important policies and for agreeing to an extension of the review period.

I look forward to hearing from you on the outcome of our recommendations.

Best regards,

A handwritten signature in cursive script that reads "George".

George Blumenthal, Chair  
Academic Council

Copy: Academic Council  
María Bertero-Barceló, Executive Director