



California Automatic Vendors Council

80 S. Lake Ave., Suite 538, Pasadena, CA 91101

Phone (626) 229-0900 Fax (626) 229-0777 Web www.cavconline.com

March 25, 2016

Ms. Monet Vela
Office of Environmental Health Hazard Assessment
P.O. Box 4010, MS-23B
Sacramento, California 95812-4010

Re: Clear and Reasonable Warning Regulations

Dear Ms. Vela:

I am writing on behalf of the California Automatic Vendors Council (CAVC) and the National Automatic Merchandising Association (NAMA) to express our opposition to warning requirements called for in the Notice of Emergency Action to Amend Section 25603.3 Title 27, California Code of Regulations warnings for exposures to Bisphenol A for Canned and Bottle Foods and Beverages and ask that this requirement not be applied to vending machines.

CAVC is an affiliated state council of NAMA, the national trade association for the vending, coffee and refreshment services industries. NAMA and CAVC represent hundreds of small businesses that provide vending, coffee and refreshment services to many thousands of Californians each day. These companies are large and small businesses that employ hundreds of workers in California.

CAVC is strongly opposed to any requirement that each vending machine in the state display a warning sign about exposure to Bisphenol A. There are hundreds of thousands of vending machines in the state of California; the man power required to place a sign on each of these machines and the cost to the vending operator would be prohibitive. Most vending operators in the state are small businesses and the vending business operates on small profit margins. Any additional cost to these operators would have a devastating impact on their bottom-line.

Further requiring these warning signs would expose these vending businesses to legal actions in the event the sign is removed from the machine without the operator's knowledge. The cost of defending against frivolous lawsuits is a burden that these small businesses can not afford.

For the reasons stated above, CAVC and NAMA must respectfully request that these warning provisions not be required for vending machines.

Sincerely,

Robert Donohue

Robert Donohue
CAVC President

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