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General Comment

September 17, 2010

To Whom It May Concern:

This comment is directed to the proposed rules of AB 71, Safety and Health Management Programs for Mines. Mine worker safety has been a paramount issue in this country but it was not until this year that it has received widespread attention. Fortunately, the Mine Safety and Health Administration (MSHA) is beginning to take proactive measures which can be seen in the proposed rules of AB 71. While adopting safety guidelines from the nation's top recognized safety organizations, ensuring that the health and safety program is operating to meet the goals it is intended to accomplish is even more so important. For these proposed rules, I suggest incorporating strict reporting deadlines on the MSHA as to the progress and achievement of goals. For example, mandated deadlines can be in yearly increments to a committee or board. In doing so, the MSHA is held to a higher level of accountability and transparency. Since in the past the MSHA has had issues with its enforcement authority, mandated reporting may give the organization a stronger sense of accountability and legitimacy. Allowing the MSHA to take ownership of the responsibilities that are conferred upon it through AB 71 can help engender a stronger sense of authority which has been lacking for many years.

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