



Making our World Safer™

2010 NOV -1 A 9:54

October 22, 2010

MSHA Docket Office  
1100 Wilson Boulevard, 21st Floor  
Arlington, VA 22209

Re: Docket Number: MSHA-2010-0005

Dear Docket Officer:

Thank you for affording the National Safety Council the opportunity to submit comments in support of the agency's efforts to develop a proposed rule for Safety and Health Management Systems for Mines. The National Safety Council is a nearly 100 year old Congressionally chartered nonprofit safety organization dedicated to saving lives by preventing injuries and deaths at work, in homes, communities and on the roads through leadership, research, education, and advocacy. Our 16,000 member organizations represent more than eight million people in 50,000 workplaces.

In May of this year, the National Safety Council adopted a formal position/policy statement encouraging all companies to adopt a safety management system and to measure results against defined criteria, demonstrate sustained management commitment and involvement in safety, and to engage workers and employee representatives to participate in the process.

Research shows that successful safety management systems share certain attributes which include leadership from management and employee representatives to assure that necessary resources are available, technical and operational elements to assure there is ongoing reduction of risk, and cultural and behavioral consideration to maximize improvement by engaging the workforce and fostering collaborative efforts for all to contribute. Our attached official position/policy statement further outlines the nine elements of the NSC model safety management system.

Again, we appreciate the opportunity to submit comments and offer our official position/policy statement for the record. Please don't hesitate to contact me if the Council can be of assistance to your rulemaking efforts.

Sincerely,

Janet Froetscher

Janet Froetscher, President & CEO

AB71-COMM-6

## National Safety Council

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### Position/Policy Statement

#### Safety Management Systems

The National Safety Council has an increasing body of evidence supporting the finding that comprehensive safety management systems are effective in reducing the risk of workplace incidents, injuries and fatalities. The National Safety Council encourages all companies to adopt a safety management system, and to measure results against defined criteria, demonstrate sustained management commitment and involvement in safety, and to engage workers and employee representatives (where applicable) to participate in the process.

A comprehensive safety management system can be defined as: a systematic, explicit and comprehensive process for managing safety risks that provides for goal setting, planning and measurement of performance. Effective safety management systems are woven into the fabric of an organization, becoming part of the culture, the way that people do their jobs. Successful safety management systems share certain attributes which include leadership from management and employee representatives to assure that necessary resources are available, technical and operational elements to assure there is ongoing reduction of risk, and cultural and behavioral considerations to maximize improvement by engaging the workforce and fostering collaborative efforts for all to contribute.

The National Safety Council model safety management system includes the following nine elements organized into three key performance areas.

#### Leadership – Management

- Management leadership and commitment
- System management and communications
- Assessments, audits and performance measurements

#### Technical – Operational

- Hazard identification and risk reduction
- Workplace design and engineering
- Operational processes and procedures

#### Cultural – Behavioral

- Worker and management involvement
- Motivation, behavior and attitudes
- Training and orientation

*This position statement reflects the opinions of the National Safety Council but not necessarily those of each member organization.*

Adopted by the Delegates, May 27, 2010