



July 31, 2025

Jessica D. Senk  
Acting Director Standards, Regulations, and Variances  
Mine Safety and Health Administration  
U.S Department of Labor  
Room C3522  
200 Constitution Avenue NW  
Washington, DC 20210

*Submitted electronically via: <https://www.regulations.gov/docket/MSHA-2025-0077>*

**Re: Improving and Eliminating Regulations; Hazardous Communication, RIN 1219-AC08 (July 1, 2025).**

Acting Director Senk,

The National Mining Association (NMA) appreciates the opportunity to submit these comments in support of the Mine Safety and Health Administration's (MSHA) proposal to revise 30 CFR part 47 to allow electronic access to all hazard communication materials at no cost to miners. This change would ensure miners have access to information about the chemical hazards where they work while reducing paperwork burdens for operators.

The NMA is the only national trade organization that serves as the voice of the U.S. mining industry and the hundreds of thousands of American workers it employs before Congress, the federal agencies, the judiciary and the media, advocating for public policies that will help America fully and responsibly utilize its vast natural resources. The NMA has a membership of more than 250 companies and organizations involved in every aspect of mining, from producers and equipment manufacturers to service providers. We work to ensure America has secure and reliable supply chains, abundant and affordable energy, and the American-sourced materials necessary for

U.S. manufacturing, national security and economic security, all delivered under world-leading environmental, safety and labor standards. America's mining industry supplies the essential materials necessary for nearly every sector of our economy – from technology and healthcare to energy, transportation, infrastructure and national security.

The proposal is part of MSHA's broader review of 19 rulemakings designed to improve and eliminate regulations that are outdated or impose unnecessary regulatory burdens. The NMA appreciates these efforts but respectfully requests that MSHA undertake a review of the following additional regulations that equally require updates or refinements.

- MSHA Part 50 governs reporting of mining-related accidents, injuries, and illnesses to enhance safety and transparency across the industry. Many of the current procedures are outdated and must be reviewed to ensure they address evolving risks, streamline compliance, and align reporting standards with today's technological and operational realities.
- 30 CFR Part 18 on the approval process for electric motor-driven mine equipment in gassy mines: MSHA's approach to approvals of new technologies in gassy mines hinders the adoption of modern technologies. MSHA's final 2024 rule, Testing, Evaluation, and Approval of Electric Motor-Driven Mine Equipment and Accessories, fell short in promoting innovative technologies. MSHA should make further refinements to embrace international standards, streamline approvals, and clear the backlog to accelerate innovation and protect U.S. miners.

We appreciate the opportunity to provide input on this proposed rule and look forward to working with MSHA on its deregulatory agenda and other efforts that align its regulations with the President's clear direction to unleash American energy and once again make America the world's premier mineral producer.

Sincerely,

A handwritten signature in blue ink that reads "Paul Krivokuca". The signature is written in a cursive, slightly slanted style.

Paul Krivokuca  
Vice President, Health and Safety