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July 31, 2025

James P. McHugh
Deputy Assistant Secretary for Policy
Mine Safety and Health Administration
200 Constitution Ave NW
Washington, DC 20210

Submitted Electronically

Re: Improving and Eliminating Regulations; Hazardous Communication; Docket: MSHA-2025-0077

Dear Deputy Assistant Secretary McHugh,

The Essential Minerals Association (EMA) is pleased to have the opportunity to comment on *Improving and Eliminating Regulations; Hazardous Communication, MSHA-2025-0077*, and other regulatory actions MSHA made available for comment on July 1, 2025. EMA is the representative voice of approximately 100 companies that extract, process, and support a vital and beneficial group of raw minerals that are the essential ingredients for many of the products used in everyday life.

The minerals produced by EMA's members are vital to the manufacturing processes for many, if not all, of the products we use daily. Every industry sector relies on various essential minerals to generate its end products, making a robust and stable supply chain critical for the continued growth and success of our economy and national security.

EMA strongly commends MSHA's initiative outlined in this proposal to enable the provision of electronic copies of Hazard Communication (HazCom) materials upon request to miners. This effort will reduce unnecessary costs while ease real-time updates to HazCom materials and improve accessibility of the information. This effort aligns regulation with modern workflows, as many companies leverage SDS software to manage their chemical inventory.

The minerals industry appreciates MSHA's efforts to ease the cost burdens on mining companies with commonsense revisions to regulatory standards that maintain the same level of protection to miners by providing chemical hazard information.

We look forward to future opportunities to provide feedback as MSHA explores further areas for regulatory improvement. Should any additional information be required, please contact me at chrisgreissing@essentialminerals.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Greissing". The signature is fluid and cursive, with the first name "Chris" and last name "Greissing" clearly distinguishable.

Chris Greissing
President, Essential Minerals Association

