



**American Federation
of Labor and
Congress of Industrial
Organizations**

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AFL-CIO

AMERICA'S UNIONS

July 31, 2025

Jessica D. Senk

Acting Director, Office of Standards, Regulations, and Variances

Mine Safety and Health Administration

U.S. Department of Labor

200 Constitution Avenue N.W.,

Washington, DC 20210

**Re: Request for Comments on Improving and Eliminating Regulations;
Hazardous Communication; Document ID: MSHA-2025-0077**

To Whom It May Concern:,

We appreciate the opportunity to comment on the Mine Safety and Health Administration (MSHA)'s proposal to revise the Hazard Communication standard. The American Federation of Labor and Congress of Industrial Organizations (AFL-CIO) represents 63 affiliated unions with nearly 15 million workers across a wide variety of industries, with workers in the mining sector making up a significant part of our federation.

We agree that hazard communication materials can be distributed in an electronic format and that mine operators could provide this option to employees. However, the proposed language revisions are not sufficient to address the fact that many miners and construction workers on mine sites live remotely, do not have reliable internet access, computers or printer access to retrieve or print this material on their own, are of older generations, and may have difficulty reading this complex information from their phones. The AFL-CIO urges the agency to revise its proposed language to give employees the choice of hardcopy or electronic hazardous communications, and not leave it solely up to mine operator discretion. Otherwise, the proposal as written would create information barriers and would weaken safety and health protections for miners and construction workers at mine sites.

The Mine Safety and Health Act of 1977 is rooted in strong training and education requirements with the clear intent of worker access to and understanding of information related to their safety and health on the job. Workers being able to receive and understand information on the identification of hazards and the methods for controlling them, as well as knowing what to expect from their employers, are all key to protecting them from dangerous job hazards. Mine operators should be required to provide this information to workers in whatever ways are most effective for workers to receive it, and operators should emphasize multiple methods of distribution and access.

For these reasons above, the AFL-CIO urges MSHA to strengthen this proposal to require operators to give employees the choice of receiving these materials in hard copy or electronic format and additionally, for employees to be able to request a hard copy as needed. Miners' lives rely on the effectiveness of this standard.

Sincerely,

A handwritten signature in black ink, appearing to read "Reindel".

Rebecca L. Reindel, MS, MPH

Safety and Health Director, AFL-CIO

A handwritten signature in black ink, appearing to read "Ayusha Shrestha".

Ayusha Shrestha

Safety and Health Policy Assistant, AFL-CIO