

1 submissions.

2 Today, we want to identify some major principles, we
3 submit, should guide your reform proposals. First, as
4 has already been indicated, the Coal Mines Regulation Act
5 will be replaced and much work has already been done
6 within the Department of Labour on a new Act. There may
7 be parts of those proposals which should be adopted,
8 however, we submit this Commission should draft its own
9 proposals based on the evidence heard here and the
10 recommendations you have received.

11 We urge you in the strongest terms, Mr.
12 Commissioner, to resist the tide of deregulation in your
13 recommendations. Westray is an example of what can
14 happen with the deregulation of Occupational Health and
15 Safety. There was complete deregulation here because the
16 authorities didn't enforce the law. We are concerned
17 that internal responsibility is being used as a cover for
18 deregulation.

19 We submit you should look at the MSHA regime in the
20 United States and recommend a system of mandatory duties
21 for mine inspectors, a kind of checklist. There should
22 be a mandatory investigation process following a safety
23 complaint from a miner or miner's representative.

24 Also borrowing from MSHA, new regulations or
25 regulations that have been challenged should be subject