

1 to public review.

2 Unlike MSHA, Mr. Commissioner, we submit your  
3 recommendations should retain a general duty for the  
4 operator to do what is necessary to maintain a safe work  
5 environment and a general discretion for the inspector to  
6 enforce that duty.

7 As well, there should be training and certification  
8 of mine inspectors.

9 The United Steelworkers of America supports the  
10 adoption of a detailed, enforceable code of practice,  
11 such as is in place in British Columbia. The code should  
12 be subject to periodic review by employers and employee  
13 representatives and variations from the code should be  
14 allowed only if they further the cause of health and  
15 safety. Penalties for violations should be severe and  
16 should extend past senior management to the directors of  
17 the company.

18 As in British Columbia, the planning and permitting  
19 process in mine development should be opened to public  
20 scrutiny. And the safety of employees must be considered  
21 in improving mine plans and changes to mine plans.

22 Provisions should be made for the Department of  
23 Resources to order independent review of a company's mine  
24 plan on the initial permit application and at any time  
25 during the operation of the mine. And this review, Mr.