

PUBLIC SUBMISSION

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Alcohol-and Drug-Free Mines: Policy, Prohibitions, Testing, Training, and Assistance

Comment On: MSHA-2008-0014-0001

Alcohol- and Drug-Free Mines: Policy, Prohibitions, Testing, Training, and Assistance

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Comment from Gary Woods, DMC mining contractors

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General Comment

About the alcohol and drug free workplace proposed rule.

The proposed rule as written will do nothing to prevent the use of either alcohol or drugs in the workplace. If there are no adverse consequences for not only an unsafe act but an illegal act where is the deterrent?

A true alcohol and drug free workplace must be a zero tolerance workplace.

If an employee has a problem and truly wants help, and ask for it most companies will assist in getting them the help needed. But if they ask as they are going in for a random test or after an accident it should be and is to late at that point.

If a serious accident occurs due to an employee using alcohol or drugs and MSHA investigates who will be held responsible? The companies whose hand you have tied in trying to prevent that very situation.

I have no idea where this proposed rule came from and don't really care, but if MSHA truly cares about miner's safety this rule must be changed.

If it is not then MSHA is an out dated organization concerned only with special interest lobbying groups, for this proposed rule could only have come from such a group.

I hope you truly have the best interest of ALL miners at heart and change this proposed rule to a true alcohol and drug free workplace law.

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