



Memorandum

TO: Health and Safety Committee
Manufacturers and Services

FROM: Paul Krivokuca, Vice President, Health and Safety

DATE: September 3, 2025

SUBJECT: NMA President and CEO to Testify Before House Natural Resources Committee on Permitting Reform

On September 2, the National Mining Association (NMA) submitted formal [comments in response to five proposed deregulatory rules](#) issued by the Mine Safety and Health Administration (MSHA). These proposals are part of MSHA's broader initiative to modernize outdated mining regulations and improve regulatory efficiency.

Three of the proposed rules aim to reduce the discretionary authority of MSHA district managers related to training, roof control and ventilation plans. The NMA expressed strong support for curbing, without completely eliminating, the discretion, citing concerns about inconsistent enforcement and legal ambiguity. The association emphasized that curbing district-level discretion would foster regulatory clarity and promote uniform standards across mining operations.

Another proposed rule facilitates the use of Powered Air-Purifying Respirators (PAPRs). The NMA endorsed this measure, highlighting that PAPRs offer enhanced respiratory protection and increased comfort for miners, particularly in environments with airborne contaminants.

The fifth rule under review pertains to the adoption of modern surveying equipment. MSHA seeks to revise technical standards to permit the use of electronic tools that improve accuracy and operational efficiency. The NMA welcomed this update, noting that current regulations often require outdated methods that hinder safe and effective practices.

Importantly, the NMA's comments reflect priorities identified by its member companies, who have consistently advocated for reforms that enhance safety, streamline compliance, and support the use of modern technologies. The NMA recommendations are intended to strengthen the deregulatory agenda and ensure that proposed changes align with the practical needs of the mining industry.

If you have any questions, please contact PK at paulkrivokuca@nma.org.

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