

Thus, as a matter of general policy, I assure the members of the Committee, that MSA favors any law, any rule or regulation, any enforcement policy, or any program of education on safe practices that will reduce the number of and severity of accidents in our industry. We have found that the promotion of safety on a concerted basis has brought gratifying results. Many MSA members report substantial savings on Workmen's Compensation premiums, simply because management has become safety conscious and has insisted that safe practices be followed by every employee.

No small part of the credit for MSA's encouraging start in the area of safety belongs to DC's able Director of Industrial Safety, Charles T. Greene. Mr. Greene takes his job seriously. While we can be sure that he is going to insist on compliance with safety regulations, we have also learned that he is keenly interested in promoting safety through educational methods. Mr. Greene has attended some of MSA's meetings, and several hundred of our supervisors and key personnel have had the benefit of a course in safety instruction provided by the District of Columbia under Mr. Greene's direction.

To the extent that H.R. 1264 will help the good work of the Director of Industrial Safety and his staff, we favor it. There are certain provisions of this Bill, however, which we believe may hamper, rather than help. For that reason, I would like to make specific comments on its various provisions.

Section 2 of title II: We agree that the definition "Employer" should not be limited by the term "Industrial employment" and likewise that "Place of Employment" should include all employment in the District of Columbia, "industrial" or otherwise. Incidentally, we have heard Mr. Kneipp's comments this morning, and I think that we would certainly agree that the reporting procedure under the Longshoreman's Act would make it possible to police this thing more effectively, and perhaps it should be limited to people that are covered there.

Section 2: This would amend Section 3 of title II by extending the existing rule making authority of the Minimum Wage and Industrial Safety Board as follows:

To promote the safety of persons employed in buildings or other structures, such rules, regulations and standards may require, without limitation, changes in the permanent or temporary features of such buildings or other structures.

While we agree that the Board should have broad authority to make all necessary rules and regulations to carry out the policies of this legislation, we have some doubts about this proposed amendment, as some of you gentlemen obviously do.

Depending on how the language is interpreted, we suggest that it may be susceptible to conflicts of responsibilities. We have always assumed that the construction of a new building must conform with the standards of the D.C. Building Code, but if the Board has the authority to require structural changes, "without limitation" much confusion and contradictory requirements could arise. If this rule making authority were limited to existing buildings and structures which may have been constructed and used for purposes other than a place of employment, but later converted to a place of employment, we see no problem. However, the building code should govern new construction. We suggest that the following clause be added to the above-quoted language "... provided such rules, regulations, and standards