

We of the printing industry are completely in favor of all reasonable and proper rules and regulations that safeguard the health and welfare of our employees. Over the past thirty years we have found that the health of our employees is of vital concern, not only because of the human considerations involved but it is just good business. Accidents are not economical. It has been asserted that nearly 30,000 accidents of "on the job injuries" cost our economy over \$32,000,000 in 1966. As these costs are borne primarily by the employer through loss of time, increased insurance premiums, medical payments and workman's compensation awards, every reputable employer is safety conscious.

In the present law which HR 1264 seeks to expand the coverage of employment and work practices of some 300,000. Employees and employers working in the private sector of this economy should have an active part in establishing those safety standards, rules and regulations under which these members have to operate. No one, without adequate knowledge of the hazards sought to be safeguarded, who is unfamiliar with the industry's working conditions and who proceed blindly from the mere words set out in a guide with archaic standards can properly know if and when a safety hazard exists.

The employers and employees of an industry can see the problems, they know the hazards and can assist the Minimum Wage and Industrial Safety Board in setting standards for their particular industry rather than having one set of regulations apply so generally to all sectors of the private economy as to become absurd and/or unreasonable, and which, when an attempt is made to enforce such general standards, it depends upon education, knowledge of the hazard, the likes and dislikes, the reasonableness or unreasonableness, the fairness or unfairness of one individual—the government safety inspector.

May I respectfully suggest to the committee that an amendment be added that would require the safety board to meet with representatives of the employers and employees of each industry to formulate a safety code for their particular industry, and any change thereafter in said safety code should not be made without a similar meeting.

May I further suggest that provision be made in the bill for a hearing so that the aggrieved party who has been charged with a violation of the safety rules and regulations, can, at his option, appear in person before the Board and present his side of the case. This is only basic American justice.

Further, in the advent of an adverse decision by the Board, there should be an appeal to a higher authority so that the Board itself will not act unreasonable or arbitrarily.

And last the inspectors who enforce these regulations should have knowledge of the particular industry involved, the hazards to be safeguarded against and should cooperate with the representatives of the Employers and Employees of that industry in their enforcement of the rules and regulations.

We are definitely against the expansion of the present law unless the above safeguards are included.

To illustrate by a specific case, how, in the face of the experts of the printing industry and its union representatives, the director of safety and his staff have actually enforced rules under this unreasonable statute, rules and regulations which were established over thirteen years ago and even though said statute provided variances for machines which had been in use ten years prior to the promulgation of said safety standards, and in its enforcement actually created hazards which had not existed prior to the enforcement of this antiquated rule.

Nave was charged with three violations on 6/22/66 by the Safety Director. I challenged the third violation as been unreasonable. The violation related to Machine guards set forth as follows:

The American Standards Association guide used by the District Inspector under section 11-2302 of the regulations set up too general a standard. The applicable portion of such provisions set out as follows:

"... all types and shapes of power-transmission belts except the following when operating at two hundred and fifty (250) feet per minute or less: flat belts one (1) inch or less in width, flat belts two (2) inches or less in width which are free from metal lacings or fasteners, round belts one-half ($\frac{1}{2}$) inch or less in diameter and single strand V-belts, the width of which is thirteen thirty-seconds ($\frac{13}{32}$) inch or less..." (Mechanical Power-Transmission Apparatus, ASA B15.1-1953)

These provisions as applied to our equipment cannot properly be enforced as most machines run at several different speeds depending on which gear-set is necessary for the size type being set by the machine. The larger the type, the