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CMA opposes government mandated committees and specific listing of duties, make-up and selection of members. CMA supports the requirement that employers create the opportunity for employees to participate in workplace safety and health program activities. However, we believe employers should have the flexibility to design and implement participation approaches appropriate to their specific workplace. This position is consistent with both the current CMA policy on employee participation (attached) and the recently approved Responsible Care® Employee Health and Safety Code of Management Practices.

During the last several years, the chemical industry has established a successful track record of employee participation efforts. It is important that we educate Congress on what our industry is already doing so we can turn its attention to encouraging and protecting the rights of employers and employees in dealing with workplace health and safety issues, rather than attempting to mandate cooperation.

In preparing your responses on the enclosed form, please describe the employee participation practices that are specific to your facility. We are interested in opportunities provided at all levels of worksite organization in the areas of safety and health.

Where you use voluntary joint committees, we would be interested in information about their make-up, how employees are selected, and what authority employees are provided. We also are particularly interested in information about participation opportunities other than committees in which you involve your employees, e.g. writing procedures, leading meetings, workgroups or special assignments, reviewing programs, conducting inspections, or assisting in detailing reports. We would like to understand how these activities are organized, how they function, how you engage employee participation, and how the activities are supported. In addition, we would also be interested if you have a special experience that may shed light on the lack of success in one approach versus another you have taken and why the one approach was not as effective as the other.

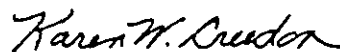
The information obtained from this exercise may be qualitatively summarized and used to enhance CMA's advocacy to OSH Act reform. The information may be included in documents being prepared such as educational and background papers to be provided to congressional staff, coalition members, and the administration. It may also be incorporated into written or verbal testimony and other formal communications. Company identity will be withheld. However, if an individual program example is presented that may be of unique or exceptional value to our advocacy efforts, permission to use the company name would be sought through the contact person listed on the response form prior to disclosure.

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Your response is requested by Wednesday, February 19, 1992.
Thank you in advance for your prompt assistance in this important
legislative advocacy effort. If you have any questions, please call me
at 202/887-1384.

Sincerely,



Karen W. Creedon

Manager

Health Programs

Enclosures

cc: OSHA Reform Matrix Team
M. Mullins