



National Safety Council

Position/Policy Statement

Response Mechanism

It is generally agreed that the National Safety Council has an obligation to bring appropriate and relevant information in the form of technical input, views and data concerned with public and occupational accidents/injuries/illnesses to the appropriate government body.

Board policy requires the Council to speak with one voice and, therefore, only consensus views of the representatives of Divisions interested in participating will be submitted to the appropriate body. Any Division which does not participate in the system relinquishes the opportunity to submit views, and the consensus of representatives of the other Divisions or Division shall constitute the Council's statement, subject to approval by the Council President.

Historically, the Council has responded on numerous occasions to an OSHA Advance Notice of Proposed Rulemaking or a Proposed Regulation. The system can be used to comment on any priority issue concerned with public and/or occupational safety and health.

The Council will use the following system for commenting to the appropriate federal body.

EVENT

1. Any Division Chairman may request the Council to develop a statement for submission to a government body. Upon approval by the Council President or his designated representative, the request activates the system.
2. All Division Chairmen are notified that the Council is activating the system via the appropriate Council staff representative. A date for Event 9 is established.
3. Council staff will prepare a document identifying the issues.
4. A "Washington Alert" concerning the request is sent to Divisions and Section Executive Committees, where appropriate.

5. Division Chairman or his designee appoints a Division ad hoc committee to develop a Division position on the issues.
6. Ad hoc committees develop a Division position on the designated issues and other issues as desired.
7. Chairmen of ad hoc committees submit Division position to the designated staff representative.
8. The designated staff representative will transmit the position of each Division on each issue to ad hoc committee chairmen and designated persons.
9. The committee of designated representatives of participating Divisions shall meet to establish, to the degree possible, a consensus of views on each of the issues. (A conference call may substitute for the meeting.)
10. Time permitting, a draft of the National Safety Council statement based on the consensus is prepared by Council staff and distributed to participating Division representatives to assure the draft accurately reflects the results of Event 9.
11. Upon his approval, Council President submits the statement to the appropriate body. Copies will be distributed to ad hoc committee members, to participating Division Chairmen, and others designated by the Division Chairmen.

The time frame to accomplish the above is usually 60-75 days from the time the request is received by the designated staff representative. This obviously requires each event to be expedited in a timely manner. The time frame shall be indicated by the designated staff representative to fit each item submitted under item 2, above.

This position statement reflects the opinions of the National Safety Council but not necessarily those of each member organization.

Approved by the Board of Directors, November 1, 1989