

The Department of Mines Minerals and Energy in general concurs with the Department of Planning and Budget's Economic Impact Analysis statement for DMME's Certification Requirements for Mineral Miners, 4 VAC 25-35.

DMME believes that the finding in the Estimated Economic Impact section that the new requirements increasing first aid training for blasters from 2 hours to 3 hours would make it harder for an individual to become certified is based on economic theory and that in practice any impact to blasters will be negligible. In fact, it is felt the benefit of a blaster having additional first aid training makes the individual a more valuable employee, thus adding value to the company.

In addition, DMME believes that by adding to the quality of the training that a miner receives, an individual will be a better trained and thus, a safer employee. Consequently, well-trained employees have increased value to their employers. The amended regulation increases the flexibility that blasters will have to find employment by streamlining training requirements that make it easier to work on coal as well as mineral mines.

In conclusion, the economic impact report projects that this one hour of added first aid training will make it more difficult for a blaster to become certified. It is unlikely that requirements that are insignificantly different will impact training by making it more difficult. Lastly, the EIA does not reflect the positive impact that having safer mines and controlling risks can positively affect the health and safety of mine workers, thus leading to increased value and use of private property.