

**Miller, Diane M. (CDC/NIOSH/EID)**

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**From:** Heidorn, Dave (CDC asse.org)  
**Sent:** Friday, July 11, 2008 8:06 PM  
**To:** NIOSH Docket Office (CDC)  
**Subject:** ASSE Comments on Draft Control Banding Review and Analysis  
**Attachments:** 071108 NIOSHCBfinal.doc

The attached comments are those of the American Society of Safety Engineers for the docket of the NIOSH draft document "Qualitative Risk Characterization and Management of Occupational Hazards (Control Banding [CB]): A Literature Review and Critical Analysis". Thank you>

Dave Heidorn, JD  
Manager of Gov't Affairs and Policy  
American Society of Safety Engineers  
847/768-3406  
dheidorn@asse.org

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**American Society of Safety Engineers  
1800 E. Oakton  
Des Plaines, IL 60018-2187  
847.699.2929  
www.asse.org**

Dr. Christine Branche  
Acting Director  
National Institute for Occupational Safety and Health  
395 E Street, S.W.  
Suite 9200  
Patriots Plaza Building  
Washington, DC 20201

By email: [nioshdocket@cdc.gov](mailto:nioshdocket@cdc.gov)

RE: ASSE Comments on Draft  
Control Banding Review and Analysis

Dear Acting Director Branche:

On behalf of its more than 32,000 member safety, health and environmental (SH&E) professionals, the American Society of Safety Engineers (ASSE) commends the National Institute for Occupational Safety and Health (NIOSH) for the thoroughness and quality of the NIOSH draft document *Qualitative Risk Characterization and Management of Occupational Hazards (Control Banding [CB]): A Literature Review and Critical Analysis*. A review by our members who are experts in managing occupational hazards and control banding concluded that this is an excellent document. The authors provide SH&E professionals, employers and other stakeholders in advancing safety a much needed comprehensive resource compiling in one place the history of control banding, comparisons between control banding systems, positives and negatives of major control banding efforts, concerns about and impediments to implementation in the United States, linkage to global harmonization of hazard communications (GHS), and recommendations on moving control banding forward.

As indicated in ASSE's *Position Statement on Control Banding and the Future of the HazCom Standard*, which can be found at <http://www.asse.org/professionalaaffairs/govtaffairs/ControlBandingFINAL0406.php>, the Society believes that the Occupational Safety and Health Administration (OSHA) and the Mine Safety and Health Administration (MSHA) must begin a process of updating the Hazard Communication Standard to incorporate elements of control banding as well as expected changes that will be brought about by GHS. This document will serve these agencies and the entire occupational safety and health community as efforts to move forward these issues forward. In ASSE's view,

advancing these issues as quickly as is reasonably possible can only help our members' employers remain competitive in a rapidly changing international environment where control banding will play an increasingly important role in controlling workplace hazards.

ASSE looks forward to making a final document available to its members as well as what we hope will be a concerted effort at OSHA and MSHA, using this NIOSH resource, to incorporate appropriately control banding in efforts to advance GHS.

Thank you for NIOSH's considerable efforts in this regard.

Sincerely,

Warren Brown, CSP  
President