



June 13, 2006

Office of Information and
Regulatory Affairs
Office of Management and Budget
Room 10201
New Executive Office Building
725 17th Street, N.W
Washington, DC 20503

Re: Proposed Risk Assessment Bulletin

Dear Sir or Madam:

The Industrial Minerals Association – North America (IMA-NA) strongly supports the Office of Management and Budget's (OMB) *Notice of Proposed Risk Assessment Bulletin*, published in the *Federal Register* on January 17, 2006. The proposed procedures for ensuring the adequacy and uniformity of the risk assessments used by federal agencies in the regulatory process mark a major step forward in improving the quality of regulatory instruments that impact the industrial minerals industry and other industries in the United States that are vital to a strong and sustainable economy.

IMA-NA believes that risk assessments performed by federal agencies tasked with drafting regulatory initiatives are a necessary and valuable tool for decision-making. Specifically, IMA-NA supports a risk assessment process that is transparent and consistent, that relies on peer review, and that is tied to the OMB Information Quality Guidelines.

A transparent system of risk assessment ensures that government not only relies on internal resources in their contemplative processes, but also utilizes and values input from the private sector. A system that relies predominately on government staff to generate or subjectively select scientific data for the ultimate purpose of regulatory action that affects the citizenry is fundamentally flawed. The private-sector, including industry, business, academia, and non-governmental organizations, is a legitimate stakeholder in the regulatory process. Regulatory instruments are far more likely to result in support and compliance from the private sector when initial input is sought from the regulated community.

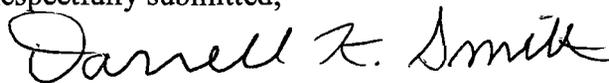
The OMB proposal also will ensure consistency in the risk assessment processes used by federal agencies. Agencies should agree on a single process so that the private sector does not waste valuable resources becoming familiar with disparate processes. Society at large, both public and private institutions, will benefit from such an efficient approach.

IMA-NA also supports the peer review requirements contained in the proposal. The scientific community has long relied on a rigorous system of peer review to ensure the integrity of research information. Agencies within the federal government responsible for drafting regulatory instruments should embrace this tenant of scientific discipline, and commit to a process of meticulous and transparent peer review.

Finally, the requirement within the bulletin that mandates the use of OMB's Information Quality Guidelines for influential risk assessments will ensure a quality product. By way of example, the industrial minerals industry is anticipating that the Occupational Safety and Health Administration (OSHA) will promulgate in the near future a regulation addressing occupational exposure to crystalline silica. OMB's Information Quality Guidelines for influential risk assessments should apply to that rulemaking. Our industry is committed to the protection of our valued workforce, and we rely on and support regulation that is based on sound science, including quality risk assessments.

IMA-NA was formed in April 2002 and has grown to 43 industrial minerals producers and processors and an associate membership of 50 companies providing goods and services to the industry. Membership includes companies that are leaders in the ball clay, bentonite, borates, feldspar, industrial sand, mica, soda ash, sodium silicate, talc, wollastonite and other industrial mineral industries. Industrial minerals are critical to the manufacture of glass, ceramics, rubber, pharmaceutical and cosmetic goods. They also are used to make foundry cores and molds needed for metal castings, paints, metallurgical applications, refractory products and specialty fillers. IMA-NA is the principal trade association representing the industrial minerals industry in North America.

Respectfully submitted,

A handwritten signature in black ink that reads "Darrell K. Smith". The signature is written in a cursive, slightly slanted style.

Darrell K. Smith

Vice president, Government and Environmental Affairs