

INDIAN MINE MANAGERS' ASSOCIATION

IMMA BHAWAN

SARAIIDHELA-828127, DIST. DHANBAD (JHARKHAND)

President

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Hony. General Secretary

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Ref No: IMMA/GOI/OSH-REG/2026 / 098

Dated: June, 29, 2026.

To,

Shrimati Vandana Gurnani,

Secretary to the Government of India,

Ministry of Labour and Employment,

Room No. 112, Shram Shakti Bhawan,

Rafi Marg, New Delhi - 110001

Email: secy-labour@nic.in

SUBJECT: Objections and Suggestions on the Draft Occupational Safety, Health and Working Conditions (Coal Mines) Regulations, 2026 (Notification G.S.R. 67(E) dated 28th January, 2026) – Proposed Revision to Regulation 20(1) regarding Qualification of 'Agent'.

Dear Sir,

This has reference to the Gazette Notification **G.S.R. 67(E)** published on **28th January, 2026**, inviting public objections and suggestions on the draft *Occupational Safety, Health and Working Conditions (Coal Mines) Regulations, 2026*.

On behalf of the Indian Mine Managers' Association (IMMA), we submit our formal suggestion in the mandated 3-column proforma format to modify Chapter III, Regulation 20(1) to transition the requirement from a generic bachelor's degree, to be appointed as Agent, to a degree in mining engineering and/or Holder of First Class Competency Certificate:

Column (i) Name and address of the persons and organizations	Column (ii) The rule or sub-rule which is proposed to be modified	Column (iii) The revised rule or sub rule proposed to be submitted and the reasons therefore
Indian Mine Managers' Association (IMMA) having its office at	Chapter III (INSPECTORS AND MINE OFFICIALS) Regulation 20.	<u>Proposed Revised Text:</u> "20. Qualification of agent.- (1) After coming into force of these regulations and subject to

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IMMA Bhawan, Saraidhela, Dhanbad- 828127 Represented by: Shri R K Sharma President, IMMA, Dhanbad, Jharkhand	Qualification of Agent.- Sub-regulation (1): “20. Qualification of agent.- (1) After coming into force of these regulations and subject to the provisions contained in Regulation 19 with regard to appointment of Agent, no person less than 25 years of age or more than 70 years of age shall act or continue to act on behalf of owner or be appointed as agent of a mine unless he or she holds a bachelor degree of an educational institution approved by the Government, and having experience of not less than 10 years in operations or activities connected with the mines.”	the provisions contained in Regulation 19 with regard to appointment of Agent, no person less than 25 years of age or more than 70 years of age shall act or continue to act on behalf of owner or be appointed as agent of a mine unless he or she holds a degree in mining engineering of an educational institution approved by the Government or Holder of First Class Certificate of Competency granted by DGMS, and having experience of not less than 10 years in operations or activities connected with the mines.” <u>Reasons for Amendment:</u> • Technical Complexity & Safety Management: Coal mines operate under hazardous and dynamic geo-technical environments involving mass production tech (e.g., continuous miners, longwall faces). Managing and executing administrative control without core mining engineering education undermines statutory safety operations. • Effective Supervisory Hierarchy: Under the OSH&WC Code framework, the Agent acts as the owner's immediate technical representative to supervise highly qualified First-Class or Second-Class certified Mine Managers. A non-technical degree holder cannot technically review, support, or command certified engineers effectively during operational crises or risk management audits.
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We request to consider this modification to prevent structural vulnerabilities in mine safety hierarchies.

Yours faithfully,

(Shri R K Sharma)

President,

Indian Mine Managers' Association (IMMA)