

Model Work Health and Safety Regulations for Mining - Public Comment Response by The AusIMM

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Codes of Practice	
Roads and Other Vehicle Operating Areas	
Section/page number	Comment
2 ID Hazard p6	The first step in identifying hazards is to review the design criteria and methodology and cross-match this with operational issues/ equipment. In identifying hazards, causal factors need to be considered. Common causal factors are failures in design and maintenance and personal error of operators. Where operator error may be a factor, fitness for duty is a key issue that needs to be considered in-vehicle operations/ operators.
3 Assess Risk p7	The code should stress that in considering risk, there is single event / acute injury risk, but there is also long term risk chronic injury. Assessment, monitoring and management strategies are quite different with chronic issues often being overlooked.
Managing Naturally Occurring Radioactive Materials in Mining	
Section/page number	Comment
Omission	While the need to record cumulative dose is recognised, the code of practice fails to identify that illness due to radiation exposure may have a long latency period. Company records including health surveillance should be kept for 30 years after which they should be released to a government health authority for eventual mortality analysis. Provisions need to be made to provide access to the records for population health studies. Provision needs to be made for individuals to access their own exposure and health records.
The Mine Records	
Section/page number	Comment
3 Content p4	Not only should the incident be recorded, but the full investigation including causal and contributing factors, failure mechanisms, remedial actions and future preventative actions also need to be recorded.
WHS Management Systems in Mining	

Section/page number	Comment
2.3 Elements p8	Insert after point 1 – Hazard Identification – A workplace health and safety systems are useless unless it correctly identifies hazards. Hazards may be quick acting resulting in acute injury or slow acting resulting in chronic injury or disorders with long latency periods.
Cont.	Insert after this - Review the design criteria and methodology and cross-match this with systems as constructed and operational issues/ equipment – (comment – Safe design is a OHS priority and needs to be raised regularly at the initial hazard identification stages)
5.1 Monitoring p23	Monitoring needs to include reporting of incidents, injuries, travel incidents, occupational diseases and disorders, occupational exposures, health disorders in which the occupational environment may have been a contributing factor and restricted duties.
Inundation and Inrush Hazard Management	
Section/page number	Comment
1.1 What is ..p5	Should include: gas and/or coal/rock outbursts, material that may be fluidized as a result of vibrations such as earthquakes or blasting.
2. ID Hazard p6	Some resources are required to assess the potential for hazards at the site evaluation and design stage.
Emergency Response in Australian Mines	
Section/page number	Comment
2.1 ID Hazard p5	Specific hazards need to be identified. Hazards may include direct falls causing traumatic injury, closure of access, closure of ventilation paths, opening of seals to areas of toxic and or inflammable gas, damage to operating, communications, services and other safety systems.
Strata Control in Underground Coal Mines	
Section/page number	Comment
	Industry technical advice should be sought here. Please contact The AusIMM for contact details of suitably qualified and experiences minerals professionals in this area of specialty.
Ventilation of Underground Mines	
Section/page number	Comment
	Industry technical advice should be sought here. Please contact The AusIMM for contact details of suitably qualified and experiences minerals professionals in this area of specialty.
Mine Closure	

Section/page number	Comment
	Industry technical advice should be sought here. Please contact The AusIMM for contact details of suitably qualified and experiences minerals professionals in this area of specialty.
Ground Control in Open Pit Mines	
Section/page number	Comment
	The AusIMM has a special technical group comprised of highly skilled and experienced open pit ground controllers. Please contact The AusIMM for contact details of suitably qualified and experiences minerals professionals in this area of specialty.
Ground Control for Underground Mines	
Section/page number	Comment
	The AusIMM has a special technical group comprised of highly skilled and experienced underground ground controllers. Please contact The AusIMM for contact details of suitably qualified and experiences minerals professionals in this area of specialty.
Underground Winding Systems	
Section/page number	Comment
	Industry technical advice should be sought here. Please contact The AusIMM for contact details of suitably qualified and experiences minerals professionals in this area of specialty.