

Model Work Health and Safety Regulations for Mining - Public Comment Response Form

Individual/Organisational name: Coal Services Pty Ltd (Mines Rescue)	
Regulations Chapter 9: Mines	
Part 9.1	
Regulation	Comment
Part 9.2	
Regulation	Comment
9.2.21 (2)(b)	<p>(b)no person at the mine is exposed to time-weighted average atmospheric concentrations of airborne dust that exceed:</p> <p style="padding-left: 40px;">(i) respirable dust—3·0 mg per cubic metre of air;</p> <p>Note: current standard in NSW Government Gazette Notice 21st December 2007 is 2.5 mg per cubic metre of air. Separate submission by Standing Dust Committee addresses this issue.</p>
9.2.22 (2)(b)	to be determined – details required
9.2.32 3(v)	<p>ADD: provision of a communication system that can-</p> <ul style="list-style-type: none"> a) survive an incident b) be backed up by a secondary system c) be quickly repaired/replaced in the event of damage.

	(vi)	ADD: provision of an atmospheric monitoring system that can- a) survive an incident b) be backed up by a secondary system c) be quickly repaired/replaced in the event of damage
	(vii)	The provision of preparation/emergency seals to strategically isolate areas of the mine.
9.2.32	4(a) (i)	Identify Mines Rescue.
9.2.33		Identify Mines Rescue
9.2.35		Identify Mines Rescue – Need details of what “test” requires. Need to specify range of testing from desktop review, targeted assessment of components of emergency plan, through to full scale emergency plan activation.
9.2.37	2 & 3	Difficult to interpret – does “hoisting” include man riding capability? Are “2 means of exiting the mine” exclusive of “hoisting shaft” and “normal exit” ie four exits required?
9.2.38		Does this mean that all personnel must have access to transport? Definition of “self rescuer” (CABA, Oxygen supplied, Filter type) Consider inclusion of a) Lifelines b) Caches c) Signage d) Personnel location
9.2.39		Additional emergency signage to include; a) Escape routes b) Refill stations c) Communication d) First Aid stations e) Fire fighting equipment f) Lifelines g) Caches i) Distance markers to surface or place of safety.
9.2.40	2	Change “self rescuer” to “self contained self rescuer”.

9.2.41	2	Change “air supplied respiratory equipment” to “self contained self rescuer”.
	3	
9.5.1	3	<p>Mine Survey Plan to show additional information;</p> <p>Second egress</p> <p>Caches</p> <p>Lifelines</p> <p>Distance markers</p> <p>Refill stations</p> <p>Preparatory seals</p> <p>Emergency seals</p>
Part 9.3		
Regulation		Comment
Schedule 9.4 p55 s1.6		Include communication systems, atmospheric monitoring systems, self escape systems.
P 56 s3		Include use of Personal communication devices.
P 57 s5		Procedure for notification of persons at a time of emergency.
Other Comments		

Codes of Practice	
Roads and Other Vehicle Operating Areas	
Section/page number	Comment
Managing Naturally Occurring Radioactive Materials in Mining	
Section/page number	Comment
The Mine Records	

Section/page number	Comment
WHS Management Systems in Mining	
Section/page number	Comment
Inundation and Inrush Hazard Management	
Section/page number	Comment
Emergency Response in Australian Mines	
Section/page number	Comment
2.2 Page 8	Plan should include: Communication and atmospheric monitoring systems should be installed in a manner which ensures their survivability and continued operation post an incident. Procedures for isolating areas of the mine in an emergency.
Page 10	Typo – last line “dangerous.
Page 14	Additional Dot Point : protection and survivability of communications.
Page 16	“training in the use of self contained self rescuers ”
Page 16 6.4	Requires details of training and qualification of Fire Officer.
Page 18 7.4	Sentence beginning “The precautionary principle is to apply.....” is not consistent with Code of Practice – Ventilation of Underground Mines Page 13 –“ very low levels of Hydrogen may occur naturally , as a seam gas” Presence of nominated gases should be a trigger to consider evacuation, rather than an automatic evacuation.
Page 22 7.10	Two additional dot points required: <ul style="list-style-type: none"> • Means of collecting representative samples of atmosphere. • Protection and back-up of sampling systems in the event of an incident.
Page 26 7.19	Additional paragraph at end. The mine operator should consider making provision that each entrance to each district is capable of being sealed in an emergency.
Strata Control in Underground Coal Mines	
Section/page number	Comment

Ventilation of Underground Mines	
Section/page number	Comment
Page 6	"Air Monitoring" – should be "Atmospheric Monitoring"
Page 6	Air Monitoring – additional bullet point <ul style="list-style-type: none"> • Protection from damage in the event of an incident.
Page 15 2.3	See submission from "Standing Dust Committee"
Section 2.4 P 20	<p>Spontaneous combustion can be detected by:</p> <ul style="list-style-type: none"> • An increase in CO Make • A change in the CO/O₂ _{def} ratio • A change in CO/CO₂ ratio • An increase in CO, Hydrogen or Ethane • The presence of Ethylene <p>Include additional ratio as means of detection for spontaneous combustion</p> <p>Note : the term "specific gravity" is used throughout the Code. Preference is to replace with "relative density".</p> <p><i>Relative density, or specific gravity, is the ratio of the density (mass of a unit volume) of a substance to the density of a given reference material. Specific gravity usually means relative density with respect to water. The term "relative density" is often preferred in modern scientific usage</i></p>
Survey and Drafting Directions for Mine Surveyors	

Section/page number	Comment
Health Monitoring	
Section/page number	Comment
Mine Closure	
Section/page number	Comment
Ground Control in Open Pit Mines	
Section/page number	Comment
Ground Control for Underground Mines	
Section/page number	Comment
Underground Winding Systems	
Section/page number	Comment