

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

Individual/Organisational name: Mark Sonter, Principal Consultant, Radiation Advice & Solutions P/L

#### Codes of Practice

Managing Naturally Occurring Radioactive Materials in Mining

Section/page  
number

Comment

General Comment:

This proposed Code is unnecessary as the topic is already fully covered in ARPANSA RPS #9, full title being Code of Practice and Safety Guide, Radiation Protection and Radioactive Waste Management in Mining and Mineral Processing, ARPANSA 2005. This document covers in full the scope of the code under review, and is already accepted into the National Directory for Radiation Protection and thus under COAG rules is required to be adopted and used by the states.

The present code for mining and processing of radioactive ores, RPS #9, together with its direct antecedents, has been in use since 1975, in all relevant jurisdictions, and is understood by the regulators and the industry, and the introduction of a new code as proposed will only cause confusion. The proposed code would fail any competently written RIS by reason of its redundancy.

I recommend you drop the proposed code and simply refer to the present ARPANSA Code.

Mark Sonter, first Uranium Mine Radiation Safety Officer in Australia, Mary Kathleen Uranium, 1977-78; RSO, Jabiluka Project, 1979-81; Radiation and Safety Superintendent, Olympic Dam Project, 1981-1990; WMC Group Mgr Health and Safety, 1990-1995; independent Consultant 1995 - 2001 and 2004-present, advising inter alia at various times Honeymoon, Beverley, and various U, HMS, and RE exploration projects.