

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

Individual/Organisational name: National Association of Testing Authorities, Australia	
Regulations Chapter 9: Mines	
Part 9.1	
Regulation	Comment
9.1.4	<p>The proposed definition of a principal mining hazard is very general and (through 9.1.4 (1) (b)) captures hazards that are also found outside mining operations. Examples might include electric shock, hydraulic hose failure, failures of IT systems and collision of vehicles – all of which have presented either multiple fatalities in a single incident or fatalities in a series of recurring incidents. Since similar requirements for identification and management of hazards exist outside mining operations it is not clear why this additional definition is needed. Instead reference should be made to indicate that the other parts of the regulation are also applicable in mining activities. Elsewhere in the suite of documents electrical hazards are identified as an “Other significant hazard” rather than a “Principal Mining Hazard” in the Draft <i>Work Health and Safety Management Systems in Mining CoP</i>. The definition of a principal mining hazard is confused and should either point to sources of fatalities in a mining environment (ie, a performance-based definition) or to mining-specific hazards (such as strata instability) (ie, a prescriptive definition). At present it attempts to point at both.</p> <p>Placing focus upon multiple fatality hazards potentially detracts from equally costly but low visibility hazards such as workplace ergonomics. Minimisation of consequences from both sets of hazards should be the aim of regulation.</p> <p>Suggest delete 9.1.4 (1) (b). Suggest rename Principal mining hazard to Mining-specific hazard.</p>
Part 9.2	
Regulation	Comment
9.2.17 / 9.2.23	There is no mention of managing gas explosions in underground mines.
Other comment	There is no mention of the management of technology in a mining context. This includes electrical power, software and microprocessor controlled plant, remote and automated plant.
Part 9.3	
Regulation	Comment

Other Comments	
Schedule 9.2 4 b) regarding roads and vehicles should include clearances (height and width) in vehicle operation	

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
Page 13	Regarding the process of hazard management, the use of the word rigorous exclusively in connection with principal mining hazards suggests that it need not be rigorous with regards other hazards of equally unfortunate consequences.
Figure 3	Plans should not arise from the selection of controls, but should be outcomes of the Health and Safety Management System. This includes P M (Principal mining?) Hazard Management plans, Emergency Response Plan elements and any other hazard management plans.
Page 18	“the affect of different operating conditions” should be “the effect of”
Cover photo	Bed management is probably not relevant to mining.
Inundation and Inrush Hazard Management	
Section/page number	Comment
Emergency Response in Australian Mines	

Section/page number	Comment
Strata Control in Underground Coal Mines	
Section/page number	Comment
Ventilation of Underground Mines	
Section/page number	Comment
Page 8	"If a gas may occur" - could this read: "If a gaseous contaminant may be encountered ..."
Page 22	The ventilation control plan must also take into account the maintenance of the ventilation systems and maintenance of monitoring systems.
Page 22	Gas monitoring systems must be periodically calibrated through a NATA-accredited laboratory to ensure these safety critical devices are performing as specified.
Page 24	<p>Revise as indicated to communicate better:</p> <p>Doors should</p> <ul style="list-style-type: none"> • be positively secured in an open position when they are not normally closed • be doubled up to provide an airlock where <ul style="list-style-type: none"> ○ short circuiting of airflow paths may lead to a hazard ○ a high pressure exists across the doors and opening or closing the doors may lead to a hazard.
Survey and Drafting Directions for Mine Surveyors	
Section/page number	Comment
Health Monitoring	
Section/page number	Comment
	<p>3.4 Quality Assurance</p> <p><i>"Where there are any specific tests required, the analytical laboratory providing the test service must be accredited for the procedure with the</i></p>

	<p><i>National Association of Testing Authorities (www.nata.asn.au).” Should be www.nata.com.au</i></p> <p>It may be appropriate to consider NATA accreditation for screening audiometry and medical imaging services.</p>
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
	<p>This document is an almost complete guidance specification of quite a different quality to other codes of practice – it’s not clear that this is appropriate material for inclusion in a National code of practice.</p> <p>NATA in it’s NDT, Mechanical and Inspection groups should be mentioned as a means of ensuring reliable testing and inspection services.</p>

Note: NATA could be involved in identifying competent ventilation assessment auditors, in audiometry, in survey of mines and several other areas.