

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

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Regulations Chapter 9: Mines	
Part 9.1	
Regulation	Comment
Part 9.2	
Regulation	Comment
Part 9.3	
Regulation	Comment
Other Comments	

Codes of Practice	
Roads and Other Vehicle Operating Areas	
Section/page number	Comment
3. Assessing Risk. Page 7	This section talks about the operator must consider the principle mining hazards individually as well as the cumulatively with other hazards at the mine and there are 8 dot points which looks at environment, roads & designs, interactions between vehicles, pedestrians & fixed structures but nothing about risk assessing the vehicle. Is the vehicle road worthy/fit for purpose for the intended journey and is it safe? What risk hazards does the driver of the vehicle need to consider in readiness of the journey eg: load management? Due to the vast distances some vehicle may have to travel to get to a work site or machinery they need to work on, operators of the vehicle tend to overload the vehicle with anything they may need to perform the job and have a "I better take these items, just in case" but in doing so have unknowingly created a safety risk which has a real potential of vehicle instability which could lead to a rollover, injury and death.

<p>4 Controlling Risk Page 8</p>	<p>Proposed Solution: Add a section on vehicle road worthiness / fit for purpose and accountability on the driver to carry out a Driver/operator Pre-trip check list on the vehicle.</p>
<p>4.5 Vehicle Selection Page 14</p>	<p>This section is under “Controlling the Risk” how does controlling risk happen in the real world? Has a risk assessment on vehicle’s been considered and/or the actual work the vehicles will be performing or intended to performed been considered. What about what the vehicle is going to carry, having ordered and fitted all the accessories has the vehicle’s GVM been exceeded? It is essential that vehicle selection is carried out based on type of work the vehicle is required to perform, the environment it is to be used and its capabilities. Too often vehicle selection could simply be on what vehicle is available or cost, leading to the wrong vehicle being selected which could also lead to injuries and fatalities.</p>
<p>4.10 Training Page 15</p>	<p>Proposed Solution. Add to this section, not only the vehicles specification and capabilities, but include key points such as Vehicle GVM, payload of vehicle, coil or leaf suspension, load restraints, seat positions these items are critical key points to be considered as part of selecting the right vehicle.</p> <p>The key to a safe working environment is prevention therefore training people on prevention is vital, unfortunately, in the mining sector and generally speaking there is a misconception that a show and tell training program is adequate. There is normally no follow up review to see if the training has hit the mark, therefore companies may have the view that their people have had the training which magically exonerates them in some way should an incident occur, it is now up to the individual to use the skills and knowledge acquired on the job.</p> <p>The second misconception is that people can conduct their own risk assessments. One just needs to stick their heads out of a window and look at a highway and how many unsafe vehicles are on our roads, vehicles that are overloaded, loose items in the tray; the vehicle itself is in disrepair. Personal responsibility plays a major part of ensuring a vehicle is safe not just for the user/driver but other people using the road. When a death occurs everyone is up in arms bitterly complaining and placing blame and yet deaths still occur, why because nothing changes, why don’t things change because both companies and people can and do get away with it. There is no enforcement of NCoPS or regular audits on people and vehicles. Training will not fix this problem as behaviour needs to change, to change behaviour one needs to change the system and force companies and people to change to make safer vehicle and roads.</p> <p>Larger mines have got good safety protocols with light vehicles but still a key to reduce potential safety risks is in training. The training should include a) risk assessments, b) understanding the safety features of a vehicle, c) Fatigue and Sleepiness. It may be assumed that people know how to risk assess, in the previous 3.0 Assessing Risk, a driver of a vehicle is assumed that as he possesses a drivers license he can risk assess a vehicle. A number of mining companies have their own Journey Management and fatigue management programs as well as 4WD training, they are being proactive in ensuring a safe journey.</p> <p>Understanding the vehicles – there is so much technology in vehicles today such as Safety Assist Technologies (SATs) which go a long way in the prevention of accidents leading to injuries or death, however, an operator of a new vehicle will not spend time in reading a vehicle’s</p>

manual. As well a lot has been written in regards to what the SAT's won't do, this becomes a vital and critical piece of information operators should know. This leads into the third important training section which is;

Fatigue & Sleepiness – both these items have been shown to be major contributors to serious accidents but there is no preventative training that is legislated. Companies may have their own internal material which covers these items however these incidents still happen. It cannot be assumed that giving the booklets to their people to read changes behaviour.

Proposed solutions: All commercial vehicles should have mandatory inspections carried out at least on a yearly basis. BHPB Mitsubishi Alliance (BMA) requires all BMA vehicles to have a yearly inspection.

Proposed Solution: Training should be competency based and must have mandatory assessments both classroom and on job and where safety is concern must achieve 100%, there is no “not yet competent with safety!”

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

Strata Control in Underground Coal Mines	
Section/page number	Comment
Ventilation of Underground Mines	
Section/page number	Comment
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

