

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

| Individual/Organisational name: Duley_Rick | |
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| Regulations Chapter 9: Mines | |
| Part 9.1 | |
| Regulation | Comment |
| 9.1.4 (2) (a)&(b) | Why the use of the term “ <i>multiple fatalities</i> ”? Surely a single fatality is sufficient cause to categorize something as a <i>principal mining hazard</i> . |
| Part 9.2 | |
| Regulation | Comment |
| Division 1 | <p>I see the usual confusion between <i>hazard</i> and <i>risk</i>. I would be happier with a general pattern such as:</p> <ul style="list-style-type: none"> • The mine operator of a mine must, so far as is reasonably practicable, identify all reasonably foreseeable <u>hazards</u> associated with mining operations at the mine. • The mine operator of a mine must, as far as is reasonable practical, eliminate all identified <u>hazards</u>. • The mine operator of a mine must assess <u>risks</u> to health and safety associated with all <u>remaining hazards</u> identified under regulation 9.2.1. • ... |
| 9.2.4 (1) | Suggest the addition of: (g) on a regular and ongoing basis at least ‘x’ times per ‘ <i>period</i> ’ |
| 9.2.15 (1) (a) | There is no reference to a safety factor. Neither is there any reference to the catenary factor (that the rope carrying capacity must take into account the weight of the rope itself). |
| 9.2.15 (6) (c) | It is not clear whether this clause refers to <u>continuous</u> communication or just the traditional bell-rope. |

| Part 9.3 | |
|----------------|--|
| Regulation | Comment |
| 9.3.2 (2) | Does the word ' <i>mine</i> ' (the last word in the clause) refer to the actual workings or to the mine site as a whole (including the accommodation). As written it might be interpreted as requiring instant dismissal and expulsion from the site, whereas I believe it intended to mean exclusion from the workings during the period in which the worker is <i>adversely affected</i> . This should be clarified. |
| 9.3.3 | As above |
| Other Comments | |
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| Codes of Practice | |
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| Roads and Other Vehicle Operating Areas | |
| Section/page number | Comment |
| | My only comment on this document is that it regularly refers to Codes of Practice which are either in Draft Form or do not appear to exist at all. As such it appears to be getting a little ahead of itself. |
| Managing Naturally Occurring Radioactive Materials in Mining | |
| Section/page number | Comment |
| | |
| The Mine Records | |
| Section/page number | Comment |
| 1.6 | <p>There is no mention in this clause of the vital issue of electronic file backups. I have an Honours Degree in Computer Science and if I learnt one thing in my university years it is the absolute necessity of keeping backup files. Prescribe it! Do not leave it to the company's IT department. It is too important for that!</p> <p>Furthermore, given the magical propensity for essential evidence in hard copy to disappear inconveniently during an investigation, it would seem prudent to establish some protocol for Mine Records to be lodged in some secure storage independent of the company concerned. This concept might create an uproar but, in the cold light of day, it makes sense.</p> |

| WHS Management Systems in Mining | |
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| Section/page number | Comment |
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| Inundation and Inrush Hazard Management | |
|---|---------|
| Section/page number | Comment |
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| Emergency Response in Australian Mines | |
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| Section/page number | Comment |
| 2.2 | Just a clarification: <i>Chapters 3 to 7 of this document provide specific detail ...</i> |
| 4 | <ul style="list-style-type: none"> In the matter of identifying <i>people undertaking specific tasks</i> by the colour of their Hard Hats: Mine workers tend to be a little nomadic, so it would be no bad thing to suggest a list of <i>tasks</i> and colours. This could avoid confusion when a worker moves from one mine to another. In the first bulleted section: <i>where emergency procedures and other system documents</i> will be kept. Second to last paragraph; second sentence: I am unclear as to the use of the term '<i>workers</i>'. This cannot mean that a bogger driver is to be involved in the establishment of the room. This sentence needs to be rephrased. |

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| 7.15 | <p>2nd paragraph: ‘... <i>basic elements necessary to sustain life for significant periods</i> ...’</p> <p>This phrase is vague (to say the least) and begs a fund of questions such as:</p> <ul style="list-style-type: none"> • What is <i>basic</i>? • What is a <i>significant period</i>? • When you say <i>life</i>, how many lives are you talking about? • How are supplies maintained and refreshed? <p>The list could go on. This is a huge question which requires much more attention than a single sentence.</p> |
| 7.17 | <p>5th bullet paragraph: ref draft Regulation 9.2.42 (1)</p> <p>‘<i>Contractors and other highly mobile workers</i>’ (and, presumably, visitors) should be made aware of these things before entering the mine.</p> |
| 7.22 | <p>Ref draft Regulation 9.2.32 (3) (a) (i):</p> <p>This particular clause is of such fundamental importance that it should be the first paragraph in the section, bold, italic, in large font!</p> |

| Strata Control in Underground Coal Mines | |
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| Section/page number | Comment |
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| Ventilation of Underground Mines | |
| Section/page number | Comment |
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| Survey and Drafting Directions for Mine Surveyors | |
| Section/page number | Comment |
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| Health Monitoring | |
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| If I ever saw a document that needed restructuring, this is it! To that end I have included <u>Health Effects Monitoring in Mining.doc</u> which is a quick attempt at restructuring the document to obtain a more logical and coherent data flow. | |
| Section/page number | Comment |
| 1.1 | Managing Risks: second paragraph: ‘ <i>Exposure may occur through inhalation, ingestion, ...</i> ’ <u>‘Injection’</u> is not listed but is, in my experience, one of the most common ways to be infected/affected. |
| 1.5 | Second bullet paragraph does not mention monitoring procedures during the worker’s employment or throughout the period of exposure to a specific hazard. Monitoring only at the start and the end does not permit trend analysis. |
| 2.1 | <ul style="list-style-type: none"> This section references Codes of Practice which are either in Draft Form or do not yet appear to exist. The last four bullets seem to be out of place in a list of <i>...activities or chemicals ...</i> |

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