

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

|  |                |                                  |
|--|----------------|----------------------------------|
| <b>Individual/Organisational name:</b> |                | Siemag Tecberg Australia Pty Ltd |
| <b>Regulations Chapter 9: Mines</b>    |                |                                  |
| Part 9.1                               |                |                                  |
| <b>Regulation</b>                      | <b>Comment</b> |                                  |
|  |                |                                  |
| Part 9.2                               |                |                                  |
| <b>Regulation</b>                      | <b>Comment</b> |                                  |
|  |                |                                  |
| Part 9.3                               |                |                                  |
| <b>Regulation</b>                      | <b>Comment</b> |                                  |
|  |                |                                  |
| <b>Other Comments</b>                  |                |                                  |
|  |                |                                  |

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

|   |                |
|---|----------------|
|   |                |
| WHS Management Systems in Mining                  |                |
| <b>Section/page number</b>                        | <b>Comment</b> |
|   |                |
| Inundation and Inrush Hazard Management           |                |
| <b>Section/page number</b>                        | <b>Comment</b> |
|   |                |
| Emergency Response in Australian Mines            |                |
| <b>Section/page number</b>                        | <b>Comment</b> |
|   |                |
| Strata Control in Underground Coal Mines          |                |
| <b>Section/page number</b>                        | <b>Comment</b> |
|   |                |
| Ventilation of Underground Mines                  |                |
| <b>Section/page number</b>                        | <b>Comment</b> |
|   |                |
| Survey and Drafting Directions for Mine Surveyors |                |
| <b>Section/page number</b>                        | <b>Comment</b> |
|   |                |
| Health Monitoring                                 |                |
| <b>Section/page number</b>                        | <b>Comment</b> |
|   |                |
| Mine Closure                                      |                |
| <b>Section/page number</b>                        | <b>Comment</b> |

|                                      |  |
|--------------------------------------|--|
|                                      |  |
| Ground Control in Open Pit Mines     |  |
| <b>Section/page number</b>           | <b>Comment</b>   |
|                                      |  |
| Ground Control for Underground Mines |  |
| <b>Section/page number</b>           | <b>Comment</b>   |
|                                      |  |
| Underground Winding Systems          |  |
| <b>Section/page number</b>           | <b>Comment</b>   |
| General Comment                      | <p>The Draft Code of Practice has numerous contradictions, discrepancies and inappropriate requirements which can be better addressed in today's technology terms and this should be canvassed throughout the industry so that a more workable document results.</p> <p>In view of this we propose firstly an extension to the comment deadline and more importantly that an industry forum be convened in order to achieve a higher level of industry participation than has been evident to date.</p> <p>Below are listed some specific concerns. These are a first pass and are by no means intended to be comprehensive.</p> |
| P12 – Cage safety --                 | <p>(1) What is intended here? Anywhere in the shaft? This is not current practice and is generally not applied to friction hoists.</p> <p>(2)</p> <p>(3) Not practical for production hoists</p>   |
| P14 – Chains---                      | Many head rope attachment strings use shackles as one of the components. Common practice is for these to have a FoS of 10.   |
| P16 – Indicators....                 | Bullet point 4 – ammeter is not necessarily correct, a means of indicating torque is more appropriate.   |
| P16 – Acceleration control           | 2 m/s is too high for most friction winder applications.   |
| P17 – Drum Brakes...                 | Brake and Brakes need to be clearly defined – is it a brake path? A friction surface? An element that applies the friction force? The issue is that there should be redundancy such that the failure of any one component will still bring the conveyance safely to rest from any normal operation.  |
| P18 -                                | <p>Second bullet point – should read ...under all ALLOWABLE conditions of load, direction of travel and speed.</p> <p>More clarity is needed under performance of winding engine mechanical brakes...</p>  |

|                                |   |
|--------------------------------|---|
| P19 Electrical braking         | More clarity is needed here. There is debate on whether under emergency trip, electrical braking is appropriate. Under power failure how would this apply?  |
| P23 – Proof Load Tests         | <p>A physical proof load test is not necessarily practical or appropriate.</p> <p>It must be demonstrate that the conveyance is capable carrying the design load with an appropriate margin of safety.</p> <p>This can be achieved through modelling, analysis and inspection, supported by independent checking.</p> <p>For example it would be impractical to do such a test for say a 50 t payload skip.</p> |
| P26 – Brake efficiency test    | Wording is specific for drum winders, needs to be changed to demonstrate the principle to be achieved   |
| P26 – brake release test       | This test is inappropriate and should never be applied to any modern winder.  |
| P42, 43 Friction Winder Brakes | <p>This section needs revision as the wording and some requirements are not appropriate for modern friction hoists.</p> <p>Time does not allow full elaboration at this stage.</p>  |
| P43 Synchronizing devices      | The statement is inappropriate for electronic systems   |