

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

<b>Individual/Organisational name:</b> Terry Fisher	
<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	
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WHS Management Systems in Mining	
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Inundation and Inrush Hazard Management	
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Emergency Response in Australian Mines	
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Strata Control in Underground Coal Mines	
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Ventilation of Underground Mines	
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2.1 Page 7	<p>A prescriptive requirement for 19.5% oxygen cannot be maintained by nature either on surface or underground. Why make it a rule? Psychrometric charts show that at wet bulb temperatures greater than 22C the moisture content in the air can be high enough to reduce/replace oxygen to as low as 18.5% by volume. It is noted in the Australian Standard on confined spaces that there is an exception for underground mines to allow for less than 19.5%. Australian underground mining legislation has nominated 18% for decades for this very valid reason. It also allows for diesels engines (that also consume oxygen and replace it with other chemicals) working in the environment. The code does not permit any recirculation of air in a diesel environment underground, recirculation is not to be tolerated or designed for, but even slightly damaged ventilation ducting will generate recirculation. This is not a sin, just an operating situation that may not be top priority to fix. Please do not let the codes of practice inhibit the great productivity of the industry in Australia for the sake of 1% less of oxygen than the prescribed level. From a risk viewpoint will the inspectors now monitor this in lieu of higher risk hazards u/g?</p> <p>I do not believe that this code of practice is designed to restrict mining activities unnecessarily due to a desire to relate underground as a confined space. Accordingly please study the physics of the proposed 19.5% rule. The 18% rule aint broke (unless you are an OHS specialist with no practical experience of the underground environment. In conclusion why does the 19.5% rule only apply to underground and confined spaces and not to a hot tropical and wind sheltered iron ore open cut?</p>
Survey and Drafting Directions for Mine Surveyors	

<b>Section/page number</b>	<b>Comment</b>
Health Monitoring	
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Mine Closure	
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Ground Control in Open Pit Mines	
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Underground Winding Systems	
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