

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
Managing Naturally Occurring Radioactive Materials in Mining	
Section/page number	Comment
	General: The draft Code is confusing, overly prescriptive and includes many errors. The comments presented in the Australian Uranium Association submission (#54) are fully supported and the comments will not be repeated here.
Sect 4, pg 18	This section is has the title: Principal Mining Hazard Management Plan for Exploration. There appears to be a lack of understanding as to

	<p>what exploration actually entails.</p> <ul style="list-style-type: none"> Paragraph 2 mentions "...the location of radioactive mineral stockpiles, tailing's storage facilities and exhaust stacks..." Exploration sites do not have tailings storage facilities. The statement: "There are four main radiation exposure pathways that require some form of control..." is incorrect. Some of these pathways may not need to be controlled it will depend on the individual situation.
Sect 4.1, pg 19	The statement 'Regular risk assessments of exposure to airborne contaminants are recommended during each phase of all mining operations, including exploration, construction, surface and underground mining, processing, shutdowns, care and maintenance and rehabilitation activities' Does not belong in the PMHMP for Exploration section.
Sect 4.1, pg 19	<ul style="list-style-type: none"> "..Restrict exposure to all by.."... – to all what?
Sect 4.1, pg 20	<ul style="list-style-type: none"> The 4th dot point states: "Dust monitoring should be conducted as inhalation is a major exposure pathway. A personal dust pump should be worn by a worker on the rig..." This is not necessarily relevant to all types of drilling. Very little dust would be generated during diamond or mud rotary drilling.
Sect 4.1, pg 20	<ul style="list-style-type: none"> The 3rd paragraph to do with water as a dust suppressant is horribly written and needs restructuring. The 6th paragraph states "...does not generally require any active control measures as it can be monitored with a survey meter...". Being able to monitor something with a survey meter does not mean it does not require active control measures.
Sect 4.1, pg 22	It is stated: "Liquid waste typically includes drilling mud, slurry from core cutting, and in some cases accidental release of groundwater containing elevated natural levels of radionuclides..." Groundwater may be an example of a liquid waste, but the accidental release certainly is not a liquid waste.
Sect 4.2, pg 23-28	This whole section contains far too much detail and is not appropriate for a code of practice.
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