

Draft Work Health and Safety (Mines) Regulation

Public comment template

Please send submissions by email to consult.minesafety@trade.nsw.gov.au Submissions must be received by **27 June 2014**.

Confidentiality: Any information that you do not wish to be made available to the public should be clearly marked 'IN CONFIDENCE'. Submissions are subject to all relevant laws such as the Government Information (Public Access) Act 2009 and the Privacy and Personal Information Protection Act 1998. NSW Trade & Investment may provide extracts of submissions to other stakeholders for comment during the review of public submissions.

Please indicate here by a tick if this submission or any parts of it are provided in confidence.

Whole submission Address and contact details Part (please specify)

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This template is divided into two parts:

1. Comments in response to discussion paper
2. Comments in relation to draft regulation

Please ensure you include the page, section number or regulation clause number to which your comment relates. Your submission should, wherever possible, include evidence and examples to justify your position.

Part 1 - Comments in response to discussion paper

Page or Section No.	Discussion point and your comment
3.9.4	Mines should be given the option to classify their Hazardous Zones based on either the NSW or QLD model. The reasons for non-harmonisation were not seen as constraints to industry. A (new) mining operation should be given the option to adopt either approach. Both approaches have demonstrated that they safely control the risks to underground coal mines.

Part 2 - Comments in relation to draft regulation	
Clause number	Title of clause and your comment or suggestion
	Definitions: low voltage means a voltage greater than extra low voltage, but not more than 1200V a.c. r.m.s. or 1500V ripple-free d.c.
3	The definition of Low Voltage should be addressed in the new regs to remove the current confusion that exists when applying the AS3000 definition to 1000volt systems.
31	Seismic activity: Is there an expectation that this is will be installed in all mines?
33	Electrical safety: Clause discusses wiring rules, why no say AS3000?
72 d ii	Ventilation. Supply of power to electrical plant. The clause does not specify removing power to the area affected and could be interpreted as removal of power to the mine. There is no mention of the need for automatic cut off. No Mention of 'as soon as practicable'. No Time allowance for backup systems to start.
73	Control and monitoring of methane levels: Installation of interlocked CH4 sensors on all diesels would require a schedule of retrofit and would present a significant cost to operations dependent on fleet size. No mention of automatic shutdown
74	Gas monitoring To achieve this real time ventilation flow monitoring and an increase in gas concentration monitoring points would be required. Presenting a cost to operations.
77	Post incident monitoring : Implies all site will need to install tube bundle system
82	Electrical Safety: Wording of clause, especially 4.
177 a x	The unintended interruption of the main system of ventilation. What time period, there will some time delay while the back up system starts up.
177 a d	Contact with energised source greater than 1200volts. Implications with regards to 3.3KV trailing and reeling cables.