Draft Mining Codes of Practice

Public comment template

Please send submissions by email to consult.minesafety@trade.nsw.gov.au. Submissions must be received by the due date for each code of practice. Due dates are written in the ‘How to make a submission’ chapter and on our website at www.resourcesandenergy.nsw.gov.au/safety.

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) | ☐ |

Name: [REDACTED]  |  | Organisation (if applicable): [REDACTED]

For each code, general feedback is sought on whether it:

- is helpful and easy to understand
- reflects current state of knowledge and technological developments in relation to managing various risks
- has an appropriate level of information (for example, is it too detailed or too general, too technical or not technical enough), and
- requires additional examples or case studies to provide clarification (Please provide relevant examples and case studies that should be included).

Further to the general feedback, comment on specific guidance in the code is sought for whether they are adequate and clear (refer to public comment overview for each code).

I think it will be helpful to the industry as a whole, and reflects the current state of knowledge. I think there are too many TARPs at the end.
<table>
<thead>
<tr>
<th>Page or section no.</th>
<th>Section title / subject of section of code</th>
<th>Comments or suggestions</th>
</tr>
</thead>
<tbody>
<tr>
<td>p3</td>
<td>How to Use the Code of Practice</td>
<td>The WHS (Mines) Regulations are still in draft. I think that these should be finalised before the finishing date for the Code of Practice is closed for public comment – as changes to the regulations may mean changes to the COP</td>
</tr>
<tr>
<td>s1.1</td>
<td>What is strata control</td>
<td>“Geotechnical Engineering is an associated term focussed more on design and construction” – Given the current trend for almost all people who practice strata control to have the job title of Geotechnical Engineer I think this sentence is misleading as it implies that Geotechnical Engineers don’t concern themselves with geomechanics</td>
</tr>
<tr>
<td>s3.1 p10</td>
<td>Site Characterisation</td>
<td>There are requirements for the seismicity of the mine to be considered and should seismicity be considered to be a plausible possibility any risks arising to be controlled</td>
</tr>
<tr>
<td>s3.1 p11</td>
<td>Site Characterisation</td>
<td>Most NSW coal mines do not have issues with mining induced seismicity. There have been reports of seismic-like events in areas of high vertical or horizontal stress as the energy is released at the face. If seismicity at the mine is perceived to be a risk or seismic events have occurred, the support regime at the mine should take into account this possibility and be designed to contain such an energy release, or the seismic risk be managed by another means.</td>
</tr>
<tr>
<td>s3.2 p11</td>
<td>Design</td>
<td>Effective risk-based design: • acknowledges the uncertainties that are intrinsic to a</td>
</tr>
<tr>
<td>Section</td>
<td>Topic</td>
<td>Description</td>
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<tr>
<td>s3.2.4 p15</td>
<td>Empirical Methods</td>
<td>Limited input data set and to the majority of design techniques and chooses appropriate FOS’s as well as a “monitor and react” strategy based on this uncertainty.</td>
</tr>
</tbody>
</table>
| s3.3 | Specific Longwall Extraction Issues | Empirical Methods are reliant on credible databases, noting in particular that:  
- Should the mechanics of the problem not be fully / correctly understood when compiling the database, fundamental input parameters may be omitted, rendering extensive scatter in the output relationship.  
- Particular care should be adopted when using databases with low correlations (or $r^2$) values. |
| s4.1.1 p24 | Estimation of geological conditions | Need to talk about face shoving.  
Geological mapping should clearly show areas where the risk of poor mining conditions is higher than normal. The following are considered particularly significant to roadway stability:  
- Normal faults with significant displacements / throw  
- Dykes that have significantly altered the surrounding coal seam. |
| s4.1.6 p28 | Strata control failure model and design of roadway support rules | … These rules, in addition to the requirements of clause 53, should cover:  
- The type of support, including specification sufficient enough to distinguish it from all other support elements available at the mine  
- Installation notes / rules. |
| s4.1.6 p29 | Strata control failure model and design of roadway support rules |  
- Storage, handling and expiry date that maintains the product quality (especially resins and chemical binders)  
- Resin mixing (including spin times) and nut tightening  
- Common installation problems, indicators and fixes. |
| Appendix A | Geotechnical and mining terms | Terms missing: active support, confinement, continuous (opposite of discontinuous), monitor, PCBU, strike.  
Also the terms jump straight from J to P – I think there should be more in here. |
| Appendix E | Examples of Hazard (Survey) Plans | **Competent Person** – a person who has acquired and maintained through training, qualification or experience…
**Dip** – the angle between the plane and the horizontal
**Shear stress** – stress parallel to a plane, tending to cause sliding. ENTER
**Slickenside** (or greasy back) - a joint surface that is polished and/or smoothly striated
**Tectonic forces** - forces in the Earth’s crust due to plate movements. These influence the direction and magnitude of the horizontal stresses

I prefer it when ATMs have an explanation of the ‘red box’ in the key. Such as: Limit of Current ATM – mining is not to continue outside this area. Contact me if you would like an example to add to the Appendix |