### Part 1 - Comments in response to the discussion paper

<table>
<thead>
<tr>
<th>Discussion point and your comment</th>
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<tbody>
<tr>
<td>2.3 page 14 Small scale gold miners in NSW should not have to comply with the high degree of safety requirements needed in a large coal mine. We are generally shallow operations, without dangerous/explosive atmospheres etc. We vehemently oppose any proposed change to NSW Mine Safety legislation/regulation that places a higher level of compliance, documentation required could be simply handled by the Mine Manager/ Mine Operator making an entry in his mine diary, as a diary entry.</td>
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### Part 2 - Comments in response to the draft WHS (Mines) Regulation

<table>
<thead>
<tr>
<th>Clause number</th>
<th>Title of clause and your comment or suggestion</th>
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</thead>
<tbody>
<tr>
<td>9 (5) &amp; (6)</td>
<td>These proposed changes are too onerous for a SSM to comply with. At the most a simple diary entry in the Mine Diary Log should be sufficient.</td>
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<td>3,(3) &amp;14 (1)</td>
<td>SSMs do not engage contractors very often and this requirement is too onerous.</td>
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<td>14 (1)(g)</td>
<td>SSMs rarely have shift work so would be unable to comply with this clause</td>
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<tr>
<td>16</td>
<td>This section is way too onerous on SSMs</td>
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<tr>
<td>25-26</td>
<td>This section should only be applicable to mines with more than 5 workers</td>
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<tr>
<td>SCHEDULE 2</td>
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**Address and contact details**: RTI MINING PTY LTD

**Name**: IAN FREELAND
high level of electrical safety requirements needed in an underground coal mine. If this proposed legislation requires SSMs to comply with the same level of electrical safety devices as a large coal

approval to collar a shaft is totally unnecessary. I recommend that SSMs be exempt from this provision, whereby the proposed legislation only relates to shafts of depths greater than 50 metres.

Re Inspection Plan: SSMs have already addressed in their SMS, therefore redundant.

Re Ropes: SSMs should be exempt from this if their winder is used in the shaft less than 51 metres deep.

Re Communication Systems: SSMs employing less than 6 persons should be exempt from this proposal.

Re All underground Mines - air quality and ventilation; surely these clauses should be in a Code of Practice, not in the proposed Regulations.

Re Duty to prepare Ventilation Control Plan: This should be covered in a Code of Practice.

Re Development of a new mine entry. We regard this activity as not to be of high risk. As for Clause 34 we recommend that SSMs be exempt from this new provision.