

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: Gavin Horobin

Organisation (if applicable): Cement Concrete & Aggregates Australia

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).

Title of Code: Mechanical engineering control plan		
Page or section no.	Section title / subject of section of code	Comments or suggestions
2.1.2	Nature/complexity of mining operations	CCAA supports the adoption of the 'proportionality' principle in this code of practice (CoP). In this regard, we consider that examples utilised in the CoP should refer to risk profiles rather than to the size of the operation.
2.4	Who is a competent person to develop a MECP?	<p>The ease of reading this section could be improved by creating sub-headings for each of the three areas of mining, namely Coal, Metalliferous and Extractive.</p> <p>In the extractive section rather than describing quarries as large, medium and small they should be referred to by their risk profile.</p> <p>Additionally, CCAA considers that in the current second paragraph 'or' should replace 'and', so that it reads as follows:</p> <p>"...a person may be considered competent if they have a mechanical engineering qualification and or two to three years' experience in procurement, installation, commissioning, operation, inspection, testing and or maintenance of mechanical aspects of mining plant and structures."</p>
4.3.2	Reliability of safeguards	CCAA considers that an example regarding the utilisation of Failure Mode and Effects Analysis would provide further clarity for operators assessing the reliability of their safeguards.
4.4.3	Unintended operation of plant	CCAA supports the inclusion of remote control plant and equipment as a dot point as noted in the consultation meeting held on 13 February 2015.
4.4.4	Unintended release of mechanical energy	This section would benefit from the inclusion of examples, such as a hole in a hose or the release of a hose.
4.5.3	Introduction of plant or structures into the mine	This section needs to clarify that MDG15 is a useful reference document and not to be used as a compliance document by the inspectorate.
4.5.7	Diesel engines	The risks associated with covers for enclosed diesel power generators should be included as a dot point.
4.5.8	Risks associated with plant	Referencing the West Australian Code of Practice on drilling plant and equipment will enhance clarity in this section.

4.5.11.1	Fires on mobile plant and conveyors	Pressurised refuelling systems should be included in this section as a risk.
6	Implementation	CCAA recommends that the Small Mines Safety Management Kit include guidance material on the MECP to assist the industry with implementation.
References	Documents that form part of this code	There needs to be a clarification that MECP is not recommending retrospective application of plant standards, such as AS 1755, and that it is referring to new plant or alterations.