# Principal hazard management plans

1. **AIM:** The objective of our principal hazard management plans (PHMP) is to focus in greater detail on those hazards that have a reasonable potential to cause multiple deaths in a single incident or in a series of recurring incidents. We will endeavour to identify, assess, control and continually review the risks associated with these hazards to reduce the likelihood of an incident occurring to the lowest practicable level possible.
2. **WHAT:** Before any mining operations take place on site where the activity could give rise to a principal hazard, a PHMP will be prepared for that hazard. The PHMP will document how the risks to health and safety of a person arising from the principal hazard will be eliminated or minimized so far as is reasonably practicable. PHMP form part of the safety management system.

Once developed the controls identified in the PHMP will be incorporated into workplace procedures, implemented, maintained and the workers will be made aware of the controls that have been identified in the plan.

Where a PHMP relates to other hazards, this will be recorded in the risk assessment and considered in a cumulative manner so that the controls can be integrated. During the identification and evaluation of specific controls the hierarchy of controls, identified in Program 5, will be considered to ensure that the highest available control is selected and recorded in the risk assessment.

We have identified our principal hazards using Table 1 (see below), remembering that the hazard must be assessed to have a reasonable potential to result in multiple deaths in a single incident or in a series of recurring incidents.

(Note: If a hazard exists on site and is not deemed to be a principal hazard then a PHMP will not be required. However, the hazard will still be managed by other documented controls such as SWMS).

1. **WHO:** Table 1 will be completed by \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (name and position) to confirm if the principal hazard exists on site. Once it has been confirmed to exist, a meeting will be arranged with a member(s) of the workforce to ensure that workers are consulted and have input into the controls used to manage the hazard.
2. **HOW:** If the principal mining hazard exists on site the corresponding PHMP form will be used to identify and assess the associated risks in more detail. The form will be completed for each listed consideration (as per legislation) and potential hazard, with agreed controls recorded for each identified hazard.

Given the size of our operation and to ensure that each PHMP is set out and expressed in a way that is readily understandable by persons, we intend to refer to the contents of this program and each completed form and control column as our PHMP for the respective principal hazard.

If the team conducting the risk assessment lacks particular knowledge regarding a hazard or consideration, we will engage a ‘subject matter expert’ to assist with the identification of controls.

After the completion of the PHMP, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (nominated person) will implement a program of works to ensure that the agreed controls are put in place when preparing workplace procedures or activities affected by the PHMP.

We will follow up the implementation of the controls with our regular inspection program in Program 6 to ensure the controls are being maintained.

**Table 1 – Determination of principal hazards on site**

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| **Hazard**  | **Does the hazard exist on site?****Y | N** | **Potential exists for multiple deaths in a single or recurring incident****Y | N** | **Reason why hazard is or is not a principal hazard** | **Form to be used** |
| Ground or strata failure |  |  |  | 19A |
| Inundation or inrush of any substance |  |  |  | 19B |
| Mine shafts and winding systems |  |  |  | N/A |
| Roads and other vehicle operating areas |  |  |  | 19C |
| Air quality or dust or other airborne contaminants |  |  |  | 19D |
| Fire or explosion |  |  |  | 19E |
| Gas outbursts |  |  |  | 19F |
| Spontaneous combustion |  |  |  | 19F |
| Subsidence |  |  |  | 19F |
| Other hazard (specify) |  |  |  |  |
| Other hazard (specify) |  |  |  |  |

1. **WHEN:** Our PHMP will be completed at the commencement of our mining operations or prior to a new PMH being identified. They will be reviewed on an annual basis as per the schedule in Program 1 or when new hazards and changes to systems of work are identified or when a notifiable incident occurs relating to the principal hazard to ensure that the controls remain applicable and relevant.
2. **ACTION:** If, during the course of completing the PHMP anyone becomes aware of a work hazard, then the \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (nominated person) will be notified and the hazard will be recorded on an action plan or in the daily diary.

The person assessing the hazard will apply our site’s risk assessment process and will act according to its outcome.

1. **DOCUMENT CONTROL:** All documentation relating to the program (e.g. Forms 19 A-F) will be filed \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_(location).

Form 19A: Ground or strata failure

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| **Principal hazard management plan** | **Ground or strata failure** | **Review date:** |
| **Hierarchy of controls (HoC):** 1. Eliminate, 2. Substitute, 3. Isolate, 4. Engineering, 5. Administrative, 6. PPE**Other hazards associated with the principal hazard:** |
| **Considerations** | **Potential hazard** | **L** | **C** | **Risk** | **Controls used to manage hazard** | **HoC** |
| Geological structure and rock properties, | * Failure of bench or face due to weathered material
* Failure of bench or face due to unstable material (columnar basalt, wedge failure, slope failure, blast damage)
* Failure due to undercutting or overhang of face
* Failure of floor due to unknown voids or cavities
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| Local hydrogeological environment  | * Failure of highwall due to surface water pooling behind the face
* Failure of highwall due to surface water concentration flowing over the face
* Collapse of highwall due to ground water flowing out of the face
* Failure of highwall due to incorrect water diversion drainage above the face
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| **Considerations** | **Potential hazard** | **L** | **C** | **Risk** | **Controls used to manage hazard** | **HoC** |
| Geotechnical attributes  | * Failure of highwall due to geological conditions (faults, intrusions, cavities, bedding and jointing)
* Failure due to no geotechnical expertise involved with bench design
* Potential of failure due to seismic activity
* Failure due to existing mining openings
* Failure to identify and monitor cracks forming on a bench or highwall
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| Pit design & layout  | * Failure of highwall due to excessive face height
* Failure of highwall due to excessive overall slope angle
* Failure of highwall due to ineffective bench width
* Failure of highwall due to face not perpendicular to structure
* Failure due to location and loadings of waste dumps and haul roads
* Failure to identify historical workings
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| Effects of blasting on structure  | * Bench failure due to excessive blast back break
* Increased fractured ground due to poor blast management practises
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| Matching machinery  | * Face not adequately scaled due to mismatch of machinery compatibility
* Working in close proximity to highwall due to incompatible machinery
* Incorrect operation of machinery by operator when scaling
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| **Considerations** | **Potential hazard** | **L** | **C** | **Risk** | **Controls used to manage hazard** | **HoC** |
| Procedures to inspect & monitor ground or strata instability | * Insufficient inspections conducted to identify potential failing ground or cracking on benches
* No monitoring devices to detect ground movement
* Absence of awareness training provided to operators regarding failure detection
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| Proposed rehabilitation methodology and how it relates to ground & strata stability | * Approved rehabilitation plan and formation of dumps does not take into account material type and ground & strata instability
* Rehabilitation is not being performed in accordance with the plan
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| Details of any proposed ground support methods or exclusion zones | * Areas of poor ground and instability not defined by exclusion zones
* Collapse due to absence of or inadequate ground support
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| Filling requirements for mined areas and the material to be used as fill  | * Collapse and subsidence of filled areas due to lack of engineering design and compaction
* Collapse due to failure to control water ingress to filled areas
* Failure due to design, operate, construct and maintain dumps and stockpiles
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| **Persons consulted during drafting of PHMP: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_** |  |
| **Person approving PHMP (name, role and signature): \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_** |  |
| **Identified controls will be incorporated into relevant SWMS, inspections and role responsibilities** |  |
| ***(This PHMP is considered a minimum requirement and any additional control measures should always be permitted)*** |  |

Form 19B: Inundation or inrush of any substance

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| **Principal hazard management plan** | **Inundation or inrush of any substance** | **Review date:** |
| **Hierarchy of controls (HoC):** 1. Eliminate, 2. Substitute, 3. Isolate, 4. Engineering, 5. Administrative, 6. PPE**Other hazards associated with the principal hazard:** |
| **Considerations** | **Potential hazard** | **L** | **C** | **Risk** | **Controls used to manage hazard** | **Hoc** |
| Sources of inundation identified (water) | * Failure or overflow of dam walls
* Failure or overflow of river levies
* Blocking or overflow of other flow channels
* Extreme weather events producing abnormal and unexpected water flows
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| Location, design & construction of water containing infrastructure | * All man-made water bearing structures have not been designed with due engineering consideration
	+ Dams
	+ Lagoons
	+ Tailings /silt dams
	+ Emplacement areas
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| Sources of inrush identified (other substance) | * Failure of disused or abandoned quarry workings
* Failure of tailings/silt dams
* Failure of any backfilled areas
* Failure of saturated dumps or stockpiles
* Failure of any geological structures
* Failure of storage bins or chutes
* Ingress of water into storage bins or chutes
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| **Considerations** | **Potential hazard** | **L** | **C** | **Risk** | **Controls used to manage hazard** | **Hoc** |
| Location of other workings and strength of ground between those workings | * Failure of natural ground between other workings and the quarry
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| Potential for accumulation of substances | * Areas exist where an accumulation of water or other substance can liquefy or flow into other workings
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| The magnitude of all sources and flow rates | * The magnitude of all potential sources and flow rates have not been evaluated.
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| The worst possible health & safety consequences | * Failure to assess the worst possible health & safety consequences of each source
	+ Extreme weather
	+ Inundation
	+ Inrush
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| Survey plans of the mine | * Failure to maintain and review plans of workings and historical workings
	+ Distances to waterways
	+ Distances to historical workings
	+ Distances to storage dams
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| **People consulted during drafting of PHMP: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_** |  |
| **Person approving PHMP (name, role and signature): \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_** |  |
| **Identified controls will be incorporated into relevant SWMS, inspections and role responsibilities** |  |
| ***(This PHMP is considered a minimum requirement and any additional control measures should always be permitted)*** |  |

Form 19C: Roads or other vehicle operating areas

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| **Principal hazard management plan** | **Roads or other vehicle operating areas** | **Review date:** |
| **Hierarchy of controls (HoC):** 1. Eliminate, 2. Substitute, 3. Isolate, 4. Engineering, 5. Administrative, 6. PPE**Other hazards associated with the principal hazard:** |
| **Considerations** | **Potential hazard** | **L** | **C** | **Risk** | **Controls used to manage hazard** | **HoC** |
| Mobile plant characteristics | * Vehicles not operating in accordance with their OEM (Original Equipment Manufacturer) design criteria
	+ Stopping distances
	+ Manoeuvrability
	+ Operating speeds
	+ Operating gradient
	+ Line of sight
	+ Matched pay load
* Vehicles not designed and maintained in accordance with industry standards
	+ ROPs (Roll Over Protection)
	+ FOPs (Fall on Protection)
	+ OPG (Operator Protective Guards)
	+ Defective tray up warning devices
	+ Compliant access ways
	+ Appropriate fire suppression systems considered
	+ Load bearing alterations not adequately designed and undertaken
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| **Considerations** | **Potential hazard** | **L** | **C** | **Risk** | **Controls used to manage hazard** | **HoC** |
| Design of roads and other vehicle operating areas | * Collision, rollover or mechanical failure due to inappropriate design
	+ Gradient & camber
	+ Width of working benches and turning circles
	+ Width & surface
	+ Windrow height
	+ Intersections
	+ Traffic flow & signage
	+ Communication
	+ Parking rules
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| Effect of expected environmental conditions on roads | * Absence of road watering facilities to supress dust & maintain road surface
* Overwatering raodways creating slippery surfaces
* Failure to consider lighting requirements for after dusk work
* Failure to manage expected water flow from rain events
* Failure to consider ‘time of day’ visibility (e.g. sunrise & sunset)
* Absence of procedures to manage work during storm events (e.g. when to stop, lightning considerations)
* Exposure to heavy fog conditions
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| Effect of mine design on roads and other operating areas | * Material falling on to roads from stockpiles or high walls due to poor separation
* Exposure to rollover potential due to embankments not bunded or barricaded
* Collapse of roads due to poor construction or geological factors
* Water pooling on roadways
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| **Considerations** | **Potential hazard** | **L** | **C** | **Risk** | **Controls used to manage hazard** | **HoC** |
| Mobile plant interactions | * Pedestrians
	+ No designated pedestrian walk ways
	+ No designated parking areas
	+ No pedestrian signage
	+ No communication systems with pedestrians
* Other vehicles
	+ No separation of light and heavy vehicles
	+ No separation of light vehicles and quarrying activities
	+ No vehicle identification systems (flashing light, reversing beeper/ cameras, flags)
	+ No procedures to control approaching and parking adjacent to heavy vehicles
	+ No defined communication systems for overtaking
* Public traffic
	+ No separation of public traffic and heavy vehicles
	+ No signage to direct customers vehicles
	+ No parking area for public traffic
	+ No mechanical assessment of public vehicles (minimum standard)
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| **Considerations** | **Potential hazard** | **L** | **C** | **Risk** | **Controls used to manage hazard** | **HoC** |
|  | * Fixed structures
	+ No identification or restricted access around and under overhead structures (including power lines / conveyors)
	+ No procedures to control excavations with respect to u/g services
	+ No assessment of size suitability between equip & infrastructure
 |  |  |  |  |  |
| **People consulted during drafting of PHMP: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_** |  |
| **Person approving PHMP (name, role and signature): \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_** |  |
| **Identified controls will be incorporated into relevant SWMS, inspections and role responsibilities** |  |
| ***(This PHMP is considered a minimum requirement and any additional control measures should always be permitted)*** |  |

Form 19D: Air quality or dust or other contaminants

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| **Principal hazard management plan** | **Air quality or dust or other contaminants** | **Review date:** |
| **Hierarchy of controls (HoC):** 1. Eliminate, 2. Substitute, 3. Isolate, 4. Engineering, 5. Administrative, 6. PPE**Other hazards associated with the principal hazard:** |
| **Considerations** | **Potential hazard** | **L** | **C** | **Risk** | **Controls used to manage hazard** | **HoC** |
| The types of contaminants likely to be in the air | * Potential for excessive dust
	+ Mine roads
	+ Crushing & Screening
	+ Blasting
	+ Public roads & access
	+ Exposure due to inappropriate operator cabins on plant
	+ Maintenance activities (mech & elec)
* Potential for chemical contaminants
	+ Fumes from flammable storage
	+ Mixing stations for chemicals
	+ Disposal areas for chemical products
	+ Mobile plant exhaust fumes
	+ Poor ventilation and handling of laboratory chemicals
* Potential for biological contaminants
	+ Spores, fungus, algae,
* Potential for Naturally Occurring Asbestos
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| **Considerations** | **Potential hazard** | **L** | **C** | **Risk** | **Controls used to manage hazard** | **HoC** |
| The levels of contaminants in the natural or supplied air of the mine | * Potential for reduced oxygen atmospheres
	+ Confined spaces
	+ Areas with a high percentage of biodegradable material
	+ Any area with less than 19.5 % O2
* Not measuring contaminant levels
	+ No inhale measurement (10 milligrams/m3)
	+ No respirable dust measurement (3 milligrams/m3)
	+ No silica dust measurement (0.05 milligrams/m3)
	+ Measuring chemical and fumes
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| Temperature and humidity of the air | * Potential for temperature and humidity extremes not considered
	+ Equipment not fitted with air con
	+ No guidance provided in procedures for stop work due to extremes (hot & cold)
	+ No equipment on site to measure temp or humidity
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| Exposure periods and reduced recovery times | * Potential for cumulative effects of extreme conditions
	+ Insufficient time to recover between shifts and/or specific activities
	+ No consideration for shift start and stop times
	+ No consideration for shift and activity duration in extreme conditions
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| **People consulted during drafting of PHMP: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_** |  |
| **Person approving PHMP (name, role & signature): \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_** |  |
| **Identified controls will be incorporated into relevant SWMS, inspections and role responsibilities** |  |
| ***(This PHMP is considered a minimum requirement and any additional control measures should always be permitted)*** |  |

Form 19E: Fire or explosion

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| **Principal hazard management plan** | **Fire or explosion** | **Review date:** |
| **Hierarchy of controls (HoC):** 1. Eliminate, 2. Substitute, 3. Isolate, 4. Engineering, 5. Administrative, 6. PPE**Other hazards associated with the principal hazard:** |
| **Considerations** | **Potential hazard** | **L** | **C** | **Risk** | **Controls used to manage hazard** | **HoC** |
| Sources of flammable, combustible and explosive substances and materials | * What sources for fire or explosions are on site
	+ Diesel
	+ Petrol
	+ General lubricants (flash point<61oC)
	+ Solvents
	+ Oxy/acetylene
	+ Other gases
	+ Welding Equipment
	+ Explosives
	+ Electrical installations
	+ Natural vegetation
	+ Naturally occurring substances (ores)
	+ Storage areas (tyres, timber, chemicals, batteries)
	+ Mobile plant
	+ Fixed plant
 |  |  |  | (Yes / No) (do sources exist and do procedures and standards exist to manage)*
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| **Considerations** | **Potential hazard** | **L** | **C** | **Risk** | **Controls used to manage hazard** | **HoC** |
| Ignition sources that may be present on site | * Potential sources (man-made)
	+ Electricity
	+ Hot work (cutting & welding)
	+ Heat generated from mobile plant, fixed plant
	+ Blasting
	+ Smoking
	+ Refuelling
* Potential sources (natural)
	+ Lightning
	+ Bushfire
	+ Spontaneous combustion
	+ Static electricity
 |  |  |  | (Yes/No) ( describe procedures used to control potential source)*
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| Likelihood of propagation to other parts of the mine | * Separation distances not adequate and storage, transport & installation standards not being met
	+ Diesel (including refuelling tankers)
	+ Petrol
	+ General lubricants (flash point<61oC)
	+ Solvents
	+ Oxy/acetylene
	+ Other gases
	+ Welding Equipment
	+ Explosives
	+ Electrical installations
	+ Natural vegetation
	+ Naturally occurring substances (ores)
	+ Storage areas (tyres, timber, chemicals, batteries)
	+ Battery Charging
	+ Mobile plant
	+ Fixed plant
* Inadequate firefighting equipment
 |  |  |  | ( note your storage, transport & installation standards used to prevent possible propagation)*
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| **Considerations** | **Potential hazard** | **L** | **C** | **Risk** | **Controls used to manage hazard** | **HoC** |
| Arrangements for the management and control of transport and storage of combustible liquids | * No or poorly maintained Safety Data Sheet information
* No workplace procedures for transport and storage.
* Poor housekeeping
* Incorrect storage containers
* Poor waste oil storage and recovery processes
* No spillage equipment
* Inadequate signage (no naked flame)
 |  |  |  |  |  |
| Arrangements for the prevention, detection and suppression of fires including firefighting equip | * Fire Extinguishers
	+ Low number of fire extinguishers
	+ Incorrect location of fire extinguishers on equipment and in buildings
	+ Incorrect types of fire extinguishers
	+ No regular maintenance of fire extinguishers
	+ No training of how to use fire extinguishers
* Suppression systems
	+ Automated & manually operated suppression systems not considered (larger mobile plant)
	+ Suppression systems not maintained
	+ Suppression systems not matched to fire potential (no external advice)
* Rural bush fires
	+ Local Rural Fire Services not contacted
	+ No refill locations on site (dams)
	+ Emerg plan not considering bush fire
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| **People consulted during drafting of PHMP: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_** |  |
| **Person approving PHMP (name, role and signature): \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_** |  |
| **Identified controls will be incorporated into relevant SWMS, inspections and role responsibilities** |  |
| ***(This PHMP is considered a minimum requirement and any additional control measures should always be permitted)*** |  |

Form 19F: Gas outbursts and spontaneous combustion and subsidence

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| **Principal hazard management plan** | **Gas outbursts & spontaneous combustion and subsidence** | **Review date:** |
| **Hierarchy of controls (HoC):** 1. Eliminate, 2. Substitute, 3. Isolate, 4. Engineering, 5. Administrative, 6. PPE**Other hazards associated with the principal hazard:** |
| **Considerations** | **Potential hazard** | **L** | **C** | **Risk** | **Controls used to manage hazard** | **HoC** |
| Gas Outbursts | * Mining activities encountering potential gas outbursts (fire & asphyxiation)
	+ Workings close to coal reserves (methane)
	+ Workings in area of known natural gas deposits
	+ Potential for the accumulation of gases from abandoned mines
 |  |  |  | (if ‘yes’ to any answers, professional advice should be sort)*

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| Spontaneous Combustion | * Mining activities encountering material that has the potential to spontaneously combust
	+ Large concentrations of sulphide bearing ores in the area
	+ Workings close to coal reserves
 |  |  |  | (if ‘yes’ to any answers, professional advice should be sort)*

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| Subsidence | * Potential for any subsidence (controlled or uncontrolled) to occur
 |  |  |  | ***Matters associated with subsidence have been covered in PHMP “Ground or Strata Failure”*** |  |

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| **People consulted during drafting of PHMP: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_** |  |
| **Person approving PHMP (name, role and signature): \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_** |  |
| **Identified controls will be incorporated into relevant SWMS, inspections and role responsibilities** |  |
| ***(This PHMP is considered a minimum requirement and any additional control measures should always be permitted)*** |  |