

**From:** [REDACTED]  
**To:** [RRD SE Resources Regulator Feedback Mailbox](#)  
**Cc:** [REDACTED]  
**Subject:** WHS Consultation Laws Feedback  
**Date:** Monday, 17 May 2021 5:23:00 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
**Importance:** High

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Dear Sir / Madam

Mining Electrical Mining Mechanical Engineering Society (MEMMES) is opposed to the proposed amendment listed in "Clause 4.1 Certificates of conformity for explosion-protected electrical equipment" in the Discussion Paper "Amendments to the Work Health and Safety (Mines and Petroleum Sites) Act 2013 and Regulation" (DOC20/948755).

On Tuesday 4<sup>th</sup> May 2021, MEMMES held a meeting for members and the mining industry engineers. Presentations were delivered by Graham Café and Tim Webster on the above issue. From the meeting it appeared that some engineers had little knowledge of this information. We encouraged people to review the Discussion Paper and make submissions.

The below outlines reasoning for MEMMES opposing this amendment.

- A certificate of conformity may not have sufficient information to maintain the plant throughout it's lifecycle. This will make it difficult to comply.
- Per the certificate of conformity, some Original Equipment Manufacturers (OEMs) may not be able to perform the maintenance tasks required due to setup and or licencing issues. This will make it difficult to comply.
- The requirement to 'must also comply' instils that the plant will need to remain in an 'as manufactured' condition throughout it's lifecycle. This is not practical to achieve.
- MEMMES is not aware of any incidents (e.g. explosions) relating from thread tolerance failure in the underground coal industry.

Our recommendation is to utilise the Australian and International Standards (e.g. AS1721) for the acceptable wear tolerances.

Kind regards

[REDACTED]  
**Director**

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