

October 2023

Response to stakeholder feedback

Technical Reference Guide: Airblast management in non-coal underground mines

The Resources Regulator (the Regulator) circulated the technical reference guide (TRG) Airblast management in non-coal underground mines for targeted consultation in September 2023. This document summarises the issues raised by stakeholders and details the Regulator’s response.

The feedback has been categorised into themes and the Regulator’s responses are set out below:

1. include subsidence PHMP in section 2.1 legislative and regulatory requirements

A stakeholder suggested that subsidence be included as a PHMP’s that airblast management should interact.

Resources Regulator response

The Regulator agrees to include subsidence in section 2.1.

2. inclusions and amendment to section 3.1 fundamentals of airblast

A stakeholder suggested to include in the body of the text further examples such as sublevel cave (point 1), drawpoints or haul road (point 3) and backfill (at dot point 3).

The stakeholder also suggested some amendments such as rewording to include “increasing” (dot point 4), changing “can” to “must” (after dot point 5), changing “cave” to void in the last paragraph. The stakeholder also suggested including references of models of different systems to measure airblast.

Resources Regulator response

The Regulator disagrees with the suggested inclusion of examples in the body of the text or to make amendments to change “cave” to void as they did not improve the document. The Regulator did not agree to change can to “must” as this is a guidance document, and the term ‘must’ is reserved for legislative requirements. The Regulator changed “can” to “may” to show options.

The Regulator agrees to include “increasing and maintain” and reword dot point 4 and to include footnote references to articles that provide examples of models to measure airblast.

3. inclusions and amendments to section 3.3 risk assessment

A stakeholder proposed:

- expanding on the recommendation to use scientific methods (dot point 5) to include industry accepted practices with examples.
- inclusion of extra points (after dot point 7) about production rates at drawpoints and bulkhead design, installation QAQC and monitoring.
- inclusion (dot point 9) of preconditioning as an example, inserting “potential” before energy and that a rewording about sudden failure and stress reduction may improve the document.
- Inclusion (dot point 11) of examples on impact of insufficient monitoring equipment.

Resources Regulator response

The Regulator disagrees with expanding the use of scientific methods to include accepted industry practice. This is because accepted industry practice can change quickly with the introduction of new technologies.

The Regulator agrees to include the point about production rates. The Regulator also agrees to include blast or hydrofracking induced failure and changing backfill to “bulkhead”, and to insert “potential” before energy. The Regulator also agreed to expand the point about insufficient monitoring.

4. inclusions and amendments to section 3.4 risk control

A stakeholder suggested (at section 3.4.2 dot point 1) that mine planning and design and geotechnical design be included. The stakeholder also suggested that (at section 3.4.4) seismic monitoring systems should be included as they are relevant to the caving mining method. It was also suggested that the first few mitigating controls were preventative (section 3.4.3).

Resources Regulator response

The Regulator disagrees that the first few controls under mitigating controls are preventative. The Regulator believes they are not preventing an event but mitigating the impact of an event.

The Regulator agrees to include mine plan design and geotechnical design and to include that seismic monitoring systems can supply useful data.

5. The TRG should be risk based

A stakeholder suggested the TRG should be risk based to enable different mining methods and development of a principal hazard management plan for airblast.

Resources Regulator response

The Regulator develops guidance to help mine operators to meet their obligations under the work health and safety legislative framework. This TRG has been developed to provide information for mine operators to consider when developing, implementing, and reviewing their safety management system. It is the mine operator's obligation to eliminate or control the risks as far as reasonably practicable associated with the mining method being carried out.

6. General editing and coal sector references

A stakeholder identified several editorial issues and other matters such as the use of coal sector examples in the body of the text, referenced coal sector articles and to the coal sector RiskGate collection.

Resources Regulator response

The Regulator agrees to address the editorial issues such as properly referencing appendices and removal of unnecessary coal sector examples from the body of the text.

The Regulator disagree to the removal the reference to RiskGate (section 3.3) and other coal sector articles that are foot noted. These references supply relevant information to the non-coal sectors on managing airblast. The Regulator believes management of the hazard and control measures for airblast are similar in both sectors.

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