

## Draft Work Health and Safety (Mines) Regulation

### Public comment template

Please send submissions by email to [consult.minesafety@trade.nsw.gov.au](mailto:consult.minesafety@trade.nsw.gov.au) Submissions must be received by **27 June 2014**.

**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) " .....

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**Organisation (if applicable): New Gold Inc.**

This template is divided into two parts:

1. Comments in response to discussion paper
2. Comments in relation to draft regulation

Please ensure you include the page, section number or regulation clause number to which your comment relates. Your submission should, wherever possible, include evidence and examples to justify your position.

### Part 2 - Comments in relation to draft regulation

Clause number	Title of clause and your comment or suggestion
16(1)(a)(b)	Safety Management System / Changes to Safety management system
	Give notice of proposed change to regulator – suggest only the Principal Control Plans be included in this as otherwise regulator will be contacted when a JSA or procedure is changes
27 (a)	Specific control measures – all mines/ Operational Controls
	Written report – suggest electronic report with wet signature as handwriting is sometimes not legible
29 (2) (a)	Specific control measures – all mines/Operation of belt conveyors
	Stipulated in AS1755 & DR AS4024:3610

29(2) (d) (i)	Specific control measures – all mines/Operation of belt conveyors Once every 8hrs; shifts are 12hrs in duration, suggest changing to once a shift; Competent person – clarification on the competent person in this case
33(g)	Specific control measures – all mines/Electrical safety Duplicated from 33(c )
33(h)	Specific control measures – all mines/Electrical safety Fed by a flexible or trailing cable - clarify; Has its power interrupted automatically if the continuity of the connection to earth is interrupted - Is in place in an underground Metaliferous Mine but not necessarily on surface for such things like pumps with flexible cables & plugs.
33(i)	Specific control measures – all mines/Electrical safety Definition of portable – same as in AS3000 or AS4871 – clarify
33(l)(i)	Specific control measures – all mines/Electrical safety Define size of transformer - suggest over 25kW. Under 25kW up stream impedance will limit the step & touch potential
33(l)(ii)	Specific control measures – all mines/Electrical safety Clarification required – where is this to be achieved? In switchboard or transformer
33(o)	Specific control measures – all mines/Electrical safety Suggest ELV excluded and welding outlets have upstream E/L protection Remove (including sub-circuits)
34	Specific control measures – all mines/Notification of high risk activities Metaliferous Mines have legacy equipment which have multi-voltage cabinets (i.e. Development & Production Drills) Unviable due to the fact the nearest Electrical Inspector is 5hrs away by road; NO live electrical work is undertaken but live fault finding or testing is, this is the historical testing of this plant (Drills); mines are working with OEMs to modify their designs to take into consideration the relevant standards
101(b)	Underground Mines/Competent person on surface Metaliferous Mines have individual section protective systems which are operated in the section of the mine under duress; Isolation of power to whole of site by the emergency stop button would cut ventilation and emergency egress to underground and cause bogging leading to overruns in the Processing Plant which may lead to persons being inundated by slurry Some mines do not run a night shift electrician in processing plant, this is an on-call position

### Part 5 - Comments in relation to draft regulation

Clause number	Title of clause and your comment or suggestion
121(4)(c)	Mine survey plans and mine plans / survey plans must be prepared
	Location of electrical installation - suggest only HV reticulation as LV reticulation would make the plans illegible

### Schedule 2 - Comments in relation to draft regulation

Clause number	Title of clause and your comment or suggestion
Part 3(3)(p)	Principal control plans-matters to be addressed/Electrical engineering control plan
	Exempt Network security

### Schedule 10 - Comments in relation to draft regulation

Clause number	Title of clause and your comment or suggestion
Part 3(6)(4)	Statutory Functions/Underground mines other than underground coal mines or small gemstone mines
	Metaliferous named as Underground Mine Supervisor – in Coal named Undermanager; suggest consistency Clarification of competency required for this position
Part 3(6)(6)	Statutory Functions/Underground mines other than underground coal mines or small gemstone mines
	Metaliferous named as Electrical Engineer – in Coal named as Electrical Engineering Manager; suggest consistency Connected power at mine is greater than 1,000kW, suggest add and/or high voltage
Part 3(6)(6)(a)	Statutory Functions/Underground mines other than underground coal mines or small gemstone mines
	Statuary function – in Metalliferous the function is to design and review the standards and procedures for the installation, commissioning maintenance and repair of electrical plant and installations at the mine - in Coal the function is to control and manage the electrical engineering activities and standards forming a part of mining operations at the mine; suggest consistency design & review can be outsource where control and manage is direct or in-house