

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)

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Organisation (if applicable): KBL Mining Limited

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
E.g. 2.1		
Pg. 5	Key Terms	Addition of: must, should, adequate, may, small quarries, small mines and competent person.
Pg. 10,	Section 1.7.3	Suggest clarifying this. As it reads it suggests the requirement to obtain the original design risk assessment.
Pg. 15/16	Section 2.4	Suggest rewording final paragraph from “For small quarries” to “For small to medium quarries and mines”
Pg. 21	Section 3.4.2, Figure 4 – Hierarchy of risk controls	Suggest standardising with WHS & WHSM Regs.
Pg. 23	Section 4.1	Paragraph 2 indicates application for plant and structures being introduced. Clarify if requirement is also retrospective.
Pg. 26	Section 4.3.4 dot point one	Suggest rewording “the required competence of workers using plant and structures for mechanical risks” to “the required competency of workers using plant and structures involving mechanical risks”
Pg. 36	Section 4.5.4 point 1.	Suggest change “relying on competencies of the people carrying out the activity, and/or” to “relying on competencies of the people carrying out the activity, and”
Pg. 42	Section 4.5.7.4 final dot point	Clarify that suppliers test certificates for individual batches are sufficient.
Pg. 44	Section 4.5.7.6	Suggest change “0.06 cubic metres per second for each kilowatt of the total maximum output of the engines.” To “0.05 cubic metres per second for each kilowatt of the total maximum output of the engines.”
Pg. 38	Section 4.5.5	For structures – inspection by a competent structural engineer should take place after a major natural event (eg. cyclone, earthquake, etc) & not as proposed two yearly. ie. is the intent of the MECP to be more onerous than high rise building structures?