

To: DRNSW MINING, EXPLORATION AND GEOSCIENCE

Re: TRG – DEVELOPMENT OF ROADS AND OTHER VEHICLE PRINCIPAL HAZARD MANAGEMENT PLAN

22 June 2023

Introduction

The Association of Mining and Exploration Companies (AMEC) welcomes the opportunity to provide stakeholder feedback for the consultation by welcomes the opportunity to provide a submission to the Department of Regional NSW, Mining Exploration and Geoscience (MEG) on the draft *Technical Reference Guide – Development of a roads and other vehicle operating areas principal hazard management plan* (Draft TRG).

About AMEC

AMEC is a leading national minerals industry association representing over 500 member companies across Australia. Our members are explorers, emerging miners, producers, and a wide range of businesses and services working in and for the minerals industry. AMEC has a growing number of companies working and investing in NSW.

Work, health and safety reform is important to the minerals industry

Work, health and safety (WHS) is, and should always be, the highest priority for the minerals industry.

NSW has a wide scope of minerals operations from a one-person exploration site to the complex deep underground coal and metalliferous mines that are all covered by the current WHS Act and Regulation. AMEC continues to support review of the current regulatory framework and consultation with industry to improve outcomes and processes that support work, health and safety.

AMEC supports the objective of Government to secure and promote improved safety outcomes for road on mine sites in NSW while establishing a safer and more modern work health and safety system, improving clarity and transparency.

Comments on key issues for the minerals industry

AMEC provides the following comments on the Draft TRG for the minerals industry. As AMEC does not represent coal or petroleum operations in NSW, we will leave comments regarding coal and petroleum to other industry stakeholders.

1. Clarity on whether exploration sites are included in the TRG

The Draft TRG provides “*mine operators with guidance on developing and documenting a principal hazard management plan for roads or other vehicle operating areas for mines and petroleum sites*”. This does not clearly state whether exploration sites are included in the requirements for this guideline as generally, exploration sites are classified as ‘mine sites’ in NSW.

Advanced exploration often involves a drill rig and other support vehicles that can sometimes require new track construction. However, as these tracks are often in place for only days or weeks, a full principal hazard management plan (PHMP) may not be appropriate. If a PHMP is required, then it should align with the scope and context of the operation.

AMEC recommends that the TRG clearly states whether exploration sites are considered mine sites and whether a principal hazard management plan (PHMP) would be required, and if so, that the content should align with the scope and context of the operation.

2. Extend the case studies, checklist and rules to include metalliferous mines (and exploration sites if appropriate)

The case studies, checklist, rules in Appendix B, C and D provide helpful information to support industry to implement the requirements of the TRG and maximise compliance. However, these Appendices relate to only underground coal mines so do not include some aspects that vary for metalliferous operations (and exploration sites if appropriate).

AMEC recommends that the case studies, checklist, rules in Appendix B, C and D include examples and information related to metalliferous (and exploration if appropriate) operations.

The minerals industry looks forward to the outcome of this consultation and AMEC would welcome further consultation on this important matter. If you have any queries regarding this submission, please do not hesitate to contact:

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Director – New South Wales, Victoria & Tasmania