

15<sup>th</sup> April 2005

Mr John Mitas  
Extractive Operations  
Mineral & Petroleum Regulation Branch  
Department of Primary Industries  
GPO Box 4440  
MELBOURNE VIC 3001

**RE: NMSF – STRATEGY 6 – CONSULTATION**

Dear John,

Thank you for providing the opportunity to comment on the National Mine Safety Framework – Strategy 6 – Consultation, sponsored by the Ministerial Council on Mineral and Petroleum Resources (MCMPR).

The proposal presented is clear and practical and the only comments would be with respect to:

**1. Proposed guidelines for consultation at workgroup or workplace level.**

On going participation requires the ability of an employee or other person within a work site to bring forward concerns and issues without fear or favour. Recognition of importance of quality information from the quarry face is imperative and must be culturally developed within our industry as a primary component of an employees daily tasks. It must be traceable and proven to involve appropriate persons and result in agreed and proven outcomes. Management must seek, participate, support and reward this culture both in the boardroom and at the quarry face.

The inclusion of some reference to support tools (e.g. An Issue Resolution Form. See Appendix 1) would be an appropriate inclusion within the employee / employer communication / consultation protocols.

The role of the health and safety representative should be supported by the company through training and needs to be identified in the role and function of the health and safety representative. This should involve a recognised minimum level of training associated with the role as the responsibility is taken up, as well as access to agreed additional support training over time.

The role of the Health and Safety representative should be shared and accessible to others over time (where practicable) to enhance the culture of safety within the workplace.

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## **2. Consultation at a State Industry Level.**

It would be appropriate that the consultation process, at the state level, incorporate industry suppliers. This is only logical as many of the safety issues faced by the industry stem back to the original capital acquisitions. Industry is often faced with the supplier of equipment offering items which have not been adequately designed and assembled to take into account state legislative requirement and operator safety (e.g. access for cleaning windows on large loaders to fuelling high track dozers).

These two examples are daily tasks which should have a minimum of risk attached to them. It is therefore unreasonable and inefficient to have management systems in place to clean windows or fuel machinery as they have been identified as extremely hazardous. These concerns should have been designed out at the drawing board.

## **3. Consultation at a National Industry Level.**

An additional issue under consultation that needs to be identified at a national level (as they are often international players) involves the participation of a body representing industry suppliers of capital equipment. This is appropriate as often they are more aware of specific issues pertaining to plant design and performance than owners, board members or regulators, as it is their livelihood which is at stake. To remove many of the safety issues faced by our industry, there is a need to have the suppliers declare their known issues so that buyers of capital items can make more informed decisions. For example, it would be naive to expect a manufacturer of a mobile drill rig (on an unstable platform) to advise a potential purchaser that there had been six roll overs of the unit in question over the last 18 months (note : all being blamed on the operator). Clearly if this information was known, a more appropriately designed undercarriage would be offered as the market would not accept the previously offered capital item on financial and safety concerns.

It may be appropriate that this be included at state level, but would require a national approach, to ensure a level playing field with respect to capital plant and equipment supply.

Once again, thank you for providing the association with the opportunity to comment and we hope our comments are of assistance.

If you would like to discuss this further, please contact Mr Ron Kerr of the CMPA on 03 9745 2132.

Sincerely,  
Ron Kerr  
Honorary CEO, CMPA Management Committee  
encl.

**Appendix 1 - Issue Resolution Form**

<b>Details of Issue</b>	
<b>Type of Issue:</b> (Tick)	<input type="checkbox"/> <b>Concern</b> <span style="margin-left: 200px;"><input type="checkbox"/> <b>Idea</b></span>
<b>Area of Issue:</b> (Tick)	<input type="checkbox"/> <b>OHS</b> <input type="checkbox"/> <b>Environment</b> <input type="checkbox"/> <b>Maintenance</b> <input type="checkbox"/> <b>Material</b>
Site:	Plant No: Person Raising Issue:
Topic of Issue:	
Brief Description:	
Suggestion for Resolution/Action to be undertaken:	
Signed:	Date: _____ / _____ / _____

<b>Site Manager's Resolution</b>	
<i>(Note: if the issue is an OHS concern or idea, it must be resolved with the Health and Safety Representative)</i>	
Resolution:	
	Carry out JSA? <input type="checkbox"/> Yes <input type="checkbox"/> No
	Raise Purchase Order? <input type="checkbox"/> Yes <input type="checkbox"/> No
	- Number: _____
	- Estimated cost: _____
	Implementation date: _____
Signed:	Date: _____ / _____ / _____

<b>Employer's Comments</b>	
<i>(Note: the Employer may nominate a representative to complete this section)</i>	
Agree with Site Manager's resolution <input type="checkbox"/> and/or	Added suggestion for resolving issue <input type="checkbox"/>
Signed:	Date: _____ / _____ / _____

Final Resolution accepted by relevant parties (OHS only)?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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<b>Completion of Resolution</b>		
<i>(Note: Completed by the Site Manager)</i>		
	<b>Signed</b>	<b>Date</b>
Details of resolution sent to relevant parties? <input type="checkbox"/> Yes <input type="checkbox"/> No		
Resolution presented at safety meeting? <input type="checkbox"/> Yes <input type="checkbox"/> No		
Have all resolutions been implemented? <input type="checkbox"/> Yes <input type="checkbox"/> No		