

13 October 2025

Ian McLeod Resources Victoria Regulatory Operations (RVRO)
Resources Victoria
DEECA

Via email: ian.mcLeod@deeca.vic.gov.au

Dear Ian

DRAFT BLASTING IMPACT ASSESSMENT GUIDE AUGUST 2025

Thank you for the opportunity to comment on the RVRO draft Blasting Impact Assessment Guide August 2025 (BIAG) formerly the draft Blasting Guidelines and the MS Teams meeting on 3 October 2025.

Submission

The CMPA **does not** support the introduction of a RVRO draft Blasting Impact Assessment Guide. However, CMPA acknowledges that the BIAG is a vast improvement on the RVRO draft Blasting Guidelines 2024.

Issues raised at the MS Teams meeting with RVRO 3 October 2025:

- Of concern is the requirement to identify and list the separation distance to every single house, pipe, power pole, road, etc within 1km of blasting. For a metro quarry with nearby streets, this is a mammoth task and is unnecessary. Listing roads, infrastructure, etc. less than 500m is more realistic. A suggestion was made that the information was already contained in the work plan which could be referenced.
- Definitions BIA: Regulatory requirements. What information would be required by the quarry to determine if blasting is in accordance with the regulations?
- BIA Requirements: *"This is to enable an informed decision to be made about whether proposed blasting activities as part of a mine or quarry operation have been designed in such a way that demonstrates that, if approved, they will comply"* Who provides this information? Quarry, external third party? What information is required in this? Is there a template?
- BIA Requirements: *"A BIA may also be required for a work plan variation application if the risk profile of operations changes (for example if there is an increase in the blasting area that reduces a separation distance to a sensitivity)." If reduce distance*

can be managed through blasting methods and the risk is reduced, is the BIA still required? Who determine this?

- Table 1 number 12. This can only be a guide. If stated categorically, this opens the site up to Compliance issues and a WPV (or whatever form the future holds). Also, different shot requirements will necessitate different Maximum Instantaneous Charges (MIC).
- Preparation of blasting information requires extensive experience. Does RVRO have that experience inhouse also?
- Appendix 1: Blast Impact Assessment number 3: Key appointments and responsibilities. The requirement for the company shotfirer or licenced shotfirer to be listed needs to be qualified. If the company changes contractors or individuals, this must not trigger a work plan variation. It is necessary to be stated explicitly in this document so there is no confusion with the RVRO compliance team.
- Appendix 1: number 4: Details of the risk management assessment. If regulated by WorkSafe, why is it here? Potential monitoring: whilst it is welcomed that the term "potential" is used in front of monitoring, the monitoring as listed will still become community expectations
- Appendix 1: number 7: Effective charge mass per delay (MIC) / Powder factor (kg/cubic metre). In a greenfield site these can only be predictions, and in a variation, can be informed by past blasts, but still need to accept a tolerance to ensure the compliance team will not start issuing unnecessary notices.
- Appendix 1: number 7: Environmental considerations for air-blast overpressure, ground-vibration. For the statement "*Reasonable consideration should be given to reducing ground vibration below 5mm/s as far as practicable*" who and how will this be enforced?
- Appendix 1: number 10: Details of the exclusion zone (Surface operations only). For the statement "*...the exclusion zone should be conservative and provide generous protection*". This is the role of the experienced blast engineer. It should not be RV personnel due to their lack of blasting experience who may be unduly influenced, by say objectors.
- Appendix 2: Qualifications and experience of person who prepared the Blast Impact Assessment. Ideally the BIA / work plan will reference this document, (correct at the time of preparing the work plan) and that it may be amended without triggering a work plan variation.

Minor adjustments

Some minor adjustments to the wording could enhance clarity and make the document more accessible for quarry personnel as shown below.

1. Changes to Blasting Operations

Changes to Blasting Operations

If a change to blasting operations is required that will result in a new risk (for example an increase in the blasting area that reduces a separation distance to a sensitivity), then the process to vary the approved work plan (as defined in the *Preparation of Work Plans and Work Plan Variations Guidelines*) will need to be followed.

I believe this section could benefit from further clarification. It should state that if a *new work extension* is proposed and it introduces a *new risk*, such as a reduced separation distance, then the process to vary the work plan should be followed.

The current wording suggests that a new risk arises to the current work plan i.e reduced separation.. then the process to vary the work plan would be required. I don't believe that a BIA would be required as blasting techniques can mitigate this risk. This would save a lot of time and effort from the quarry going through the process of a BIA.

2. Limit Instantaneous Charge

No.	AS2187.2	Required information
	Appendix A2.2	

Limit instantaneous charge mass – Specify a maximum instantaneous charge mass if close to a sensitive receptor.

I would change this to “Specify the predicted maximum instantaneous charge (MIC).”

Providing a predicted MIC offers flexibility to account for variations in separation distances, timing, and blast orientation. My concern with the phrase “specify the MIC” is that it may imply a fixed value, potentially limiting operational flexibility. Quarry personnel should not be constrained by a rigid figure, especially when blasting conditions can change and require adaptive planning.

3. MIC

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|----|-----|---|
| 7. | (k) | Effective charge mass per delay (MIC) / Powder factor (kg/cubic metre) <ul style="list-style-type: none"> State that the maximum charge (in kgs) planned to be initiated at the same time and that the charge will be restricted if necessary to reduce blasting impacts Provide the expected powder factor. This may include a range of powder factors. |
|----|-----|---|

“Provide the expected range of the maximum charge (in kilograms) planned to be initiated simultaneously. This range may vary depending on factors such as product density, hole diameter, and depth. Also, include the anticipated maximum charge to allow for adjustments aimed at minimising potential blasting impacts, if required.”

4. Vibration Limits

FOR OCCUPIED NON-SENSITIVE BUILDINGS (e.g., Commercial / Industrial premises):

Ground vibration

That the peak particle velocity resulting from blasting operations, as measured in the vicinity of any occupied non-sensitive site, in accordance with AS2187.2:2006 Explosives – Storage and Use, will not exceed 25mm/s at any time

I would add to this sentence – will not exceed 25 mm/s at any time unless agreement has been made with the stakeholder for a higher limit (as per the AS2187).

5. Blast Exclusion Zones

10.	(y)	Details of the exclusion zone (Surface operations only)
		The shotfirer is responsible for determining the exclusion zone. To satisfy RV's requirements in determining whether blasting can be undertaken safely, the exclusion zone should be conservative and provide generous protection: • Around the outside of the site for the public, public infrastructure, the environment and land; and • Within the site for the environment and any public infrastructure. RV considers it is best prepared on a transparency at the same scale as the Site Plan and used as an overlay to manage risks. It should consider the nature of the site, powder factor, the direction of the blast and whether all face blasts will be laser profiled with accompanying bore tracking. It should clearly enable the identification of blast areas to be cleared and where sentries may be required on the outside of the site to prevent access.

I would also suggest including a note that if blasting parameters change, whether due to updated Boretrak data, or a change in blasting methods or techniques, that a revised blast exclusion zone should be established to reflect the deviation from the transparent site plan scale map.

The CMPA developed the Blast Management Plan Template Issue 3 2020 which encompasses both Earth Resources Regulator (ERR) and WorkSafe Victoria requirements.

I would be pleased to discuss these matters with you. Please contact me on 0434 692 618 or via email at elizabeth.gibson@cmpavic.asn.au in respect of any matter.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'EM Gibson'. The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Dr Elizabeth Gibson
General Manager

About CMPA

CMPA is the premier representative body for the Victorian extractive resources industry. It represents a broad spectrum of those involved in construction material processing including construction and demolition waste recycling businesses and has a membership base consisting of over 220 quarries across the industry. Together, these members employ approximately 2000 Victorians which underpins the construction industry of almost 240,000 employees (<https://liveinmelbourne.vic.gov.au/connect/victorian-industries/transport-defence-and-construction>).

CMPA members are typically small to medium sized family, and private businesses, local government, utility providers and national companies. Many are regionally based employers and service local construction, infrastructure, and road maintenance needs. The extractives sector is a key pillar within the construction industry underpinning the growth and economic development of Victoria through supply of the construction materials.

In 2023/24, the sector supplied approximately 67 million tonnes of construction materials and 7 million tonnes of recycled construction and demolition waste (25% of total freight movement in Victoria) to the market, at a value of approximately \$1.3 billion directly supporting Victoria's \$80 billion Big Build (<https://bigbuild.vic.gov.au/about>) and the estimated 1.6 million new homes required by 2050 (<https://earthresources.vic.gov.au/geology-exploration/industry-investment/joint-ministerial-statement-on-extractive-resources>). Small to medium quarries account for approximately half of this production and is submitted to be a vital industry supporting the ongoing economic prosperity of Victorians. An additional 6.5 million tonnes of recycled construction and demolition waste was also produced.

The CMPA supports the principle of responsible, balanced legislation that is in the best interests of the State of Victoria and Australia.