

31 July 2024

Response to stakeholder feedback

Technical reference guide to the development of a fire or explosion principal hazard management plan

The Resources Regulator circulated the technical reference guide (TRG) development of a fire or explosion principal hazard management plan for targeted consultation in May and June 2024. This document summarises the issues raised by stakeholders and details the Regulator's response.

The feedback has been categorised into themes and the Regulator's responses are set out below.

1. Further reference to Resources Regulator documents and section 5 being relevant to coal mines only

A stakeholder suggested including further references to TRGs relating to underground mining where fire or explosion is relevant and that it be made clear that section 5 relates to coal mines only

Resources Regulator's response

The Regulator agreed to include reference to TRGs on ventilation control, gas outburst, fans in underground coal mines and windblast. The Regulator also included a clear statement that section 5 relates specifically to coal mines.

2. Hot surfaces in an underground coal mine must be below 150°C

A stakeholder identified that in underground coal mines external surfaces must be below 150°C as required by the WHS(MPS) Regulation 2022

Resources Regulator's response

The Regulator has changed the reference to "must" rather than should when it is required by the WHS(MPS) Regulation 2022

3. Include further matters in risk assessment

A stakeholder suggested including fuel load, overpressure and projectiles as issues to consider. A stakeholder also suggested modifying outcomes of risk assessments to include systems for self-escape.

Resources Regulator's response

The Regulator agreed to include these suggestions in section 4.2 of the TRG including modifying systems to notify workers to enable them to withdraw or self-escape rather than emergency evacuation.

4. Electrical equipment

A stakeholder requested that specific standards for electrical equipment design be included in section 4.3.1 for underground coal mines.

Resources Regulators response

The Regulator believes the relevant standards need to be identified by the mine operator and has not included specific references to them.

5. Specific emergency isolation recommendations for liquid or gaseous fuels

At section 4.3.1 regarding electrical switchgear a stakeholder suggested that guidance on isolation points for liquid or gaseous fuels should be included in the TRG as there are recommendations that a mine's electrical control plan should include isolation.

Resources Regulators response

The Regulator believes there is sufficient guidance in AS1940 on safe handling and storage of combustible liquids that is referred to in section 4.3 of the TRG.

6. Automatic communication alarm system; fire suppressing agents, fire extinguisher safe locations and equipment compatibility

A stakeholder in section 4.3 suggested clarifying what is meant by systems to communicate to all persons; include fire suppression as an alternative to water, clarify what a safe location for fire extinguishers may be and provide further information on compatible equipment with the NSW fire brigade.

Resources Regulator's response

The Regulator clarified that automatic trigger alarms to all personnel is recommended (s3.3.2), included fire suppressant (s3.3.3) and gave an example of what a safe location is for a fire extinguisher such as outside a switch room for a switch room fire. A reference to the NSW Fire Brigade guidance on compatible Storz hose connections has been included (s3.3.3.6)

7. Establishment of fire teams

A stakeholder suggested removing section 4.3.4 regarding establishment and training of fire teams as it is no longer a regulatory requirement.

Resources Regulator's response

The Regulator notes it is not a regulatory requirement to establish a fire team. The Regulator recommends that if a mine operator's risk assessment warrants it, then a fire team should be established and trained. The Regulator has retained the section as a recommendation and not a mandatory requirement. Section 4.5.1 discusses that firefighting plans should be in the mine's emergency plan.

8. Include a reference to NSW Fire and Rescue guidance on tactical fire plans

A stakeholder suggested including a reference to the NSW Fire and Rescue guidance on tactical fire plans.

Resources Regulator's response

The Regulator has included a note in section 4.5.1 referring mine operators to the NSW Fire and Rescue guideline for tactical fire plans.

9. Fire hoses, pumpsets and fire hydrants

A stakeholder suggested removing the fire hydrant 190m requirements from face production (s5.3.3.2) to say sufficient distance and clarify where the notes in section 5.3.3.2 originated from. A stakeholder also suggested that 30m hoses (s5.4) are unnecessary as there are alternatives such as jumper hose reels. A stakeholder also suggested clarifying the water usage of pumpsets and storage to be shown in total litres (s5.1 and s5.3.1.2) used.

Resources Regulator's response

The Regulator does not believe the 190m fire hydrant distance recommendation should change, however it has clarified the notes are from the Regulators experience and provide useful information to mine operators. The Regulator included (s5.4) that alternatives such as jumper hose reels could be an alternative if they provided suitable coverage. The Regulator did not see it as useful to provide total water usage or storage calculations as the mine operator should determine the quantity.

10. Fire substations

A stakeholder suggested being more general in the description of an underground coal mine fire substation and that information should be recommendations "should" not "shall." A stakeholder also suggested clarification on how fire substations should be kept in an effective state.

Resources Regulator's response

The Regulator believes the current description is a longstanding reasonable recommendation and does not need to be amended. The Regulator has changed "shall" to "should" and included a clarification on what an effective state of a substation is.

11. First aid fire fighting

A stakeholder suggested changing the heading of section 5.4.7 from first aid firefighting to first response firefighting.

Resources Regulator's response

The Regulator has changed the heading to first response firefighting as it is the contemporary term

12. Other fire risk controls

A stakeholder suggested for underground garages in coal mines (s5.5.1) that adequate ventilation to direct combustion products to return airways should be included. A stakeholder also suggested that for operation of belt conveyors (s5.5.6) should include that accumulation of dust from damaged convey belts be immediately removed.

Resources Regulator's response

The Regulator agreed to these suggestions and has included the suggestion that combustion products be directed to return airways in underground garages in coal mines and that accumulated fibres from conveyor belts be removed.

13. General editorial issues

A stakeholder identified a number of improvements on editorial flow, grammar and spelling throughout the TRG.

Resources Regulator's response

The Regulator agreed to the suggestion when it improved the flow of the TRG or corrected an error.

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