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) ☐…………………………………………………………..

Name: Rod Sumner	Organisation (if applicable):Carve Business Solutions

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: Safety Management System in Mining		
Page or section no.	**Section title / subject of section of code**	Comments or suggestions
2.1	The SMS must be documented. It must be understandable to those who read it. It should be written in plain language. Some workers may require translation	This does not go far enough. We need to also address not just poor literacy levels but also the amount of information employees are given. The average human can only take in approx. 7 "chunks" of information at one time and yet we allow them to be provided with 10-30 procedures in one sitting where they are expected to read and sign off as having understood them. Only a change in legislation will stop this ridiculous practice. It is fine to say the documentation must be understandable by those that read it- but how can we be certain of this- we must do away with writing documents in legalese/safety science terminology and make the use of pictures and graphics mandatory
4.7	Information, Training & Instruction:\nTraining should take into account the make-up of the workforce (eg. Level of education, literacy and the language spoken	Again this does not go far enough- all too often we see the one size fits all approach. 44% of Australians have poor literacy levels and yet the majority of training is through written procedures- there is too much focus on making sure the paper trail is in place at the expense of providing information that is interesting, engaging and understandable by the end user (front line workers)
	General	I believe this is a good document, well thought out and easy to follow, however for real improvement there has to be a focus on the tools that those ultimately responsible for making it work use- the people on the shop floor. Try and see it through their eyes. The focus has to be on stopping the glass being broken in the first place not being expert at cleaning it up when it does