

**Public comment response template to Discussion Paper: Maintenance of Competence for Practising Certificates**

Please send submissions by email to [consult.minesafety@industry.nsw.gov.au](mailto:consult.minesafety@industry.nsw.gov.au)  
Submissions must be received by the due date of Monday 1 February 2016.

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**Responses to discussion points**

1. Is the proposed model for the MOC scheme suitable for application for practising certificate holders in NSW?

Response - Yes

2. Are the areas of competence and their topics suitable and cover the areas adequately?

Response:- Involvement in development and review of standards, guidelines and feedback requirements

3a. Are the types of formal and informal learning with their maximum claimable hours suitable?

Response: 1. Feedback on draft documents such as standards, guidelines, codes 2. Report writing and content material/specifications/details

3b. Is the percentage split between the minimum number of formal hours (66%) against a maximum of 33% for informal hours appropriate?

Response: Yes

4. Are the numbers of learning hours for each practising certificate and areas of competence appropriate to maintain competence a) per year b) over five years?

a) per year - response - No - at least 30 hours as almost one session can cover these hours in one year for managers and 15 hours for ventilation officers

b) over five years? - response - No - This should line up with EA standard which is 150 hours for engineers specific and 80 hours for ventilation officers

5. Are the requirements for certificate holders in the MOC scheme reasonable and practical?

Response: Yes they are practical but I would add a couple more such as 1. Water management both incoming and pumping 2. Diesel emission controls 3. Reclaim tunnels and management of them 4. Confined space 5. Hot work

6a. Are the record keeping requirements for certificate holders to satisfy in the MOC scheme

Response:- Yes

6b. Are the governance processes proposed by the department adequate to ensure compliance with the MOC scheme by practising certificate holders?

Response: Yes