

Statutory Compliance Audit – Grasstree Mine

***Statutory Compliance
Audit/Review of the Safety and
Health Management System***

Grasstree Mine

November 2019

Audit Client: Sarah Makepeace

***Auditor: Phil Reed,
Reed Mining Consultants Pty Ltd***

Statutory Compliance Audit – Grasstree Mine

1 Executive Summary

This report summarises the statutory compliance audit/review of the Grasstree Mine Safety and Health Management System conducted by Phil Reed (Reed Mining Consultants Pty Ltd) at the request of Sarah Makepeace – Systems and Assurance Manager.

The audit aims to provide an independent external assessment of the compliance of the Safety and Health Management System against the requirements of the Queensland Coal Mining Safety and Health Act 1999 (the Act) and the Queensland Coal Mining Safety and Health Regulation 2017) (the Regulation).

The audit has been conducted using criteria obtained directly from the Act and Regulation. The audit identified a range of responses to the criteria from compliance to non-conformance.

The audit was conducted with full cooperation and enthusiasm from all persons who were approached as part of the audit. The audit findings and conclusions are offered constructively and with the intent to improve the legislative compliance and eventually mine safety at Grasstree Mine.

The audit has found that the Safety and Health Management System (SHMS) currently in place at Grasstree is compliant as most documents are in place and within five (5) year review date, including the Management Structure and Mine Record.

Overall, the detail in the documents audited generally comply with the requirements of the Coal Mining Safety and Health Act 1999 and Coal Mining Safety and Health Regulation 2017.

Most the Principal Hazard Management Plans (PHMPs), Hazard Management Plans (HMPs) and all the Standard Operating Procedures (SOPs) are in place and within the stated review period – excellent result.

The main issue identified during the audit is that there are number of risk assessments that are either overdue or could not be found on SharePoint. These risk assessments may exist but they are not readily available on SharePoint.

Details of each of the above areas are discussed in the Audit Findings section of this Report.

The detail of the status of all documents audited against the requirements of the legislation can be found in the Audit Tool.

*Statutory Compliance Audit – Grasstree Mine**Table of Contents*

1	EXECUTIVE SUMMARY.....	2
2	AUDIT SCOPE.....	4
3	AUDIT PROCESS.....	4
4	AUDIT FINDINGS.....	5
4.1	Status of Safety and Health Management System	5
4.2	Management Structure	5
4.3	Mine Record	6
4.4	Risk Assessments	7
4.5	Standard Operating Procedures – SOPs	9
4.6	Other Procedures	10
5	RECOMMENDATIONS FOR IMPROVEMENT.....	11

Statutory Compliance Audit – Grasstree Mine

2 Audit Scope.

The Scope of the audit was compliance of the Grasstree Safety and Health Management System (SHMS) against the requirements of Queensland Coal Mining Safety and Health Act 1999 (the Act) and the Queensland Coal Mining Safety and Health Regulation 2017) (the Regulation).

3 Audit Process

The audit was conducted by Phil Reed of Reed Mining Consultants Pty Ltd.

This was a desktop audit to determine whether all requirements of the legislation were being addressed within the Grasstree Mine SHMS.

An Audit Tool was developed to conduct the audit based on the requirements of:

- Queensland Coal Mining Safety and Health Act 1999*
- Queensland Coal Mining Safety and Health Regulation 2017*

All available SHMS documentation was reviewed against the audit tool.

Statutory Compliance Audit – Grasstree Mine

4 Audit Findings

4.1 Status of Safety and Health Management System

The audit has found that the SHMS currently in place at Grasstree is compliant as most documents (except some risk assessments) are in place and within five (5) year review date.

Overall, the detail in the documents audited generally comply with the requirements of the Coal Mining Safety and Health Act 1999 and Coal Mining Safety and Health Regulation 2017.

Most of the Principal Hazard Management Plans (PHMPs), Hazard Management Plans (HMPs) and all the Standard Operating Procedures (SOPs) are in place and within the stated review period – excellent result.

Management at Grasstree should be commended for not only ensuring that the SHMS at Grasstree is compliant with the requirements of the Coal Mining Safety and Health Act 1999 and Coal Mining Safety and Health Regulation 2017, but also that the majority of documents are up to date and within the review date.

The main issue identified during the audit is that there are number of risk assessments that are either overdue or could not be found on SharePoint. These risk assessments may exist but they are not readily available on SharePoint.

4.2 Management Structure

The audit has found that the Management Structure for Grasstree mine is a very good document and compliant with section 55 of the Coal Mining Safety and Health Act 1999 including:

- It appears to be well maintained and kept up to date.
- Ample evidence that any changes to the Management Structure are sent to the Mines Inspector within the required fourteen (14) days

The only potential issue with the latest version of the Management Structure Version 66 (19/6/2019) is that it shows the Underground Mine Manager does not have any other positions reporting to him.

This appears to be an error as previous versions do have other positions reporting to the Underground Mine Manager.

Statutory Compliance Audit – Grasstree Mine

As such it is recommended:

Check Org. Chart in section 2(4) of Management Structure version 66 dated 19/6/2019 as it shows Underground Mine Manager (UMM) does not have anyone reporting to him

4.3 Mine Record

The Grasstree Mine Record contains much of the required information as per section 68 of the Coal Mining Safety and Health Act 1999 including:

- Mines Inspectors MRE's and mine's replies*
- Directives and mine's replies*
- Accidents and Incident reports, ICAMs*
- HPI notifications and reports*
- Management Structure*
- Appointments*

All the above information has been kept up to date.

The following are suggested additions to the Grasstree Mine Record:

Appointment of Coal Mine Operator

In the Grasstree Mine Record there was no evidence the appointment of the Coal Mine Operator and the Coal Mine Operator Representative.

This should be included in the Mine record.

Mines Rescue Agreement

It is recommended that the Grasstree – Mines Rescue Agreement be added to the Mine Record.

Statutory Compliance Audit – Grasstree Mine

4.4 Risk Assessments

The following table lists the risk assessments that need to be attended to for a variety of reasons including:

- No risk assessment could be found
- Overdue for review
- Inadequate cross section of the workforce
- Inadequate risk assessment

Any required risk assessment not listed in the table below is deemed to be acceptable at the time of the audit. Full details of all risk assessments can be found in the Audit Tool

CMSHR No.	Risk Assessment No.	Risk Assessment Title	Action Required
56	RA.GTM.031	"Hazardous Substances"	Review and update Risk Assessment "Hazardous Substances" RA.GTM.031 17/7/2014 – Overdue for review
94	RA.UGGT.852.1	"Checking and Examining Work Areas"	Conduct risk assessment "Checking and Examining Work Areas" RA.UGGT.852.1 19/7/2012 – overdue for review
96(i)		"Controlling Access to and Working in Confined Spaces"	Conduct risk assessment for "Controlling Access to and Working in Confined Spaces" No evidence of risk assessment could be found on SharePoint Management Plan does

Statutory Compliance Audit – Grasstree Mine

<i>CMSHR No.</i>	<i>Risk Assessment No.</i>	<i>Risk Assessment Title</i>	<i>Action Required</i>
			<i>not state document number of risk assessment</i>
96(ii)	RA.UGGT.096(b).1	"Manual Handling"	Conduct risk assessment for "Manual Handling" RA.UGGT.096(b).1 - 1/12/2012 as it is overdue
96(c)(ii)	RA.UGGT.096(c)(ii)	"Hot Work"	Review and update risk assessment "Hot Work" - RA.UGGT.096(c)(ii) 17/6/2010 – overdue for review
149(c)	RA.PHMP.GTM.005.3	"Methane Drainage"	Review and update risk assessment "Methane Drainage" - RA.PHMP.GTM.005.3 - 25/8/2012 – overdue for review
149(g)	RA.PHMP.GTM.007	"Outburst"	Review and update risk assessment "Outburst" PHMP - RA.PHMP.GTM.007 - 25/8/2012 – overdue for review
221	RA.UGGT.134	"Use of Explosive Power Tools"	Review and update risk assessment "Use of Explosive Power Tools" RA.UGGT.134 15/6/2010 – overdue for review
299	RA.UGGT.299	"Safety of Persons when only one Escapeway is	Review and update risk assessment "Safety of Persons when only one

Statutory Compliance Audit – Grasstree Mine

<i>CMSHR No.</i>	<i>Risk Assessment No.</i>	<i>Risk Assessment Title</i>	<i>Action Required</i>
		<i>available for use”</i>	<i>Escapeway is available for use”</i> <i>RA.UGGT.299</i> <i>As it overdue for review - 4/7/2012</i>
<i>323(3)</i>		<i>“Installing Strata Support”</i>	<i>Locate or conduct risk assessment for SOP “Installing Strata Support”</i> <i>Risk assessment is not referenced in SOP and cannot be found on SharePoint</i>

4.5 Standard Operating Procedures – SOPs

The following table lists the SOPs that need to be attended to for a variety of reasons including:

- No SOP could be found
- Overdue for review

Any required SOP not listed in the table below is deemed to be acceptable at the time of the audit. Full details of all SOPs can be found in the Audit Tool

<i>CMSHR No.</i>	<i>SOP No.</i>	<i>SOP Title</i>	<i>Action Required</i>
<i>96</i>	<i>SOP.UGGT.096(b).1</i>	<i>“Manual Handling”</i>	<i>Review and update SOP “Manual Handling” SOP.UGGT.096(b).1 1/12/2012 – overdue for review</i>
<i>96 and 265</i>	<i>SOP.UGGT.096(c)(ii)</i>	<i>“Conducting Hot Work Underground”</i>	<i>Review and update SOP “Conducting Hot Work Underground”</i>

Statutory Compliance Audit – Grasstree Mine

<i>CMSHR No.</i>	<i>SOP No.</i>	<i>SOP Title</i>	<i>Action Required</i>
			- <i>SOP.UGGT.096(c)(ii) – 20/5/2014 – overdue for review</i>

4.6 Other Procedures

The following table lists the Procedures that need to be attended to for a variety of reasons including:

- *No Procedure could be found*
- *Overdue for review*

Any required SOP not listed in the table below is deemed to be acceptable at the time of the audit. Full details of all SOPs can be found in the Audit Tool

<i>CMSHR No.</i>	<i>Procedure No.</i>	<i>Procedure Title</i>	<i>Action Required</i>
91	MP.GTM.021.1	"Noise Management Plan"	Review and update "Noise Management Plan" MP.GTM.021.1 25/8/2014 - overdue for review
158	GSHMS.052	"Self Rescuers and Other Breathing Apparatus"	Review and update "Self Rescuers and Other Breathing Apparatus" GSHMS.052 17/5/2004 – overdue for review
257		"Designing, installing, inspecting and maintaining conveyors"	Locate or develop a procedure/standard/SOP for "Designing, installing, inspecting and maintaining conveyors" as document cannot be found on SharePoint

Statutory Compliance Audit – Grasstree Mine

5 Recommendations for Improvement

Line No. in Audit Tool	Description
1, 3 and 34	<p><i>Mine Record</i></p> <ul style="list-style-type: none"> • <i>Add appointment of Operators Representative into Grasstree Mine Record</i> • <i>Check Org Chart in section 2(4) of Management Structure version 66 dated 19/6/2019 as it shows Underground Mine Manager (UMM) does <u>not have</u> anyone reporting to him</i> • <i>Add Mines Rescue Agreement into Mine Record on SharePoint</i>
59	<p><i>Decide whether to keep</i></p> <p><i>“Recovering Fixed and Mobile Plant after an Accident or Incident” SOP.MP.GTM.013.072(b)</i></p> <p><i>Or</i></p> <p><i>“Mobile and Fixed Plant Operations” SOP.UGGT.375</i></p> <p><i>Both documents are on SharePoint and cover the same topic “Recovering Fixed and Mobile Plant after an Accident or Incident” but have different document no.s</i></p>
73	<ul style="list-style-type: none"> • <i>Add “Mine Training Competence Scheme” (5-32) to System STD 05 Training Awareness, Competence & Fit for Work</i>
120	<p><i>Grasstree Management to decide which of the following two SOPs should be retained</i></p> <p><i>“Provision for Self Escape of Persons from the Mine”</i></p> <p><i>Both have the same document No.</i></p> <p><i>SOP.PHMP.GTM.011.168</i> <i>Issue dates are different</i> <i>6/12/2016</i> <i>17/5/2019</i></p>

Statutory Compliance Audit – Grasstree Mine

<i>Line No. in Audit Tool</i>	<i>Description</i>
163	<p data-bbox="410 362 1252 394"><i>Risk Assessment RA.GTM.735 “Gas Monitoring” overs 4 x SOPs</i></p> <ul data-bbox="459 439 1390 806" style="list-style-type: none"> <li data-bbox="459 439 1390 508">• <i>Changing Gas Alarm Level Settings, Installing Changing and Removing Gas Monitoring Equipment” SOP.PHMP.GTM.005.1.225</i> <li data-bbox="459 551 1260 584">• <i>“Acknowledging Gas Alarms” SOP.PHMP.GTM.005.1.226</i> <li data-bbox="459 627 1390 696">• <i>“Taking Action when Methane Detected at a Ventilation Split or Main Return Airway” SOP.PHMP.GTM.005.1.249</i> <li data-bbox="459 739 1276 806">• <i>“Action to be taken if Methane Detector Activates or is Non-Operational” SOP.PHMP.GTM.005.1.250</i> <p data-bbox="410 886 1130 918"><u><i>Each SOP should have its own WRAC risk assessment</i></u></p>

Statutory Compliance Audit – Grasstree Mine

6