

PIRC - Submission - Resources Safety and Health Queensland and Other Legislation Amendment Bill 2026

Submission No: 004

Submission By: Mine Managers Association of Australia Incorporated

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Mine Managers
Association of Australia

MINE MANAGERS 'ASSOCIATION OF AUSTRALIA INCORPORATED
ABN 39 182 124 240

Secretary: Ray Robinson
PO Box 1116
Toronto NSW 2283
Phone: 0419545767
admin@minemanagers.com.au
www.minemanagers.com.au

16 March 2026

Queensland Parliamentary Service,
Primary Industries and Resources Committee,
Cnr George and Alice Streets,
Brisbane, QLD, 4000, Australia
On-line submission.

Dear Secretary,

**Subject: MMAA Submission – Resources Safety and Health Queensland and Other Legislation
Amendment Bill 2026**

On behalf of the Mine Managers' Association of Australia ("the Association"), please accept the following comments on the amendments proposed under the Resources Safety and Health Queensland and Other Legislation Amendment Bill 2026 ("the Bill"). The Association supports the periodic review of mining safety legislation and governance structures to ensure they remain fit for purpose, reflects contemporary best practice and delivers optimum safety outcomes for the industry.

We appreciate this opportunity to provide feedback.

The Association's predecessor, the Colliery Managers' Association of New South Wales, was constituted in the Hunter Valley in 1942. Since its inception the Association has grown to represent members in most states of the Commonwealth and New Zealand. Our membership has grown to 420 members and membership, whilst mainly directed to practising mine managers, also includes a diverse range of senior management in the coal mining industry: from chairmen and directors of companies, mines inspectors, academics, consultants and senior technical managers. To our knowledge all practising underground mine managers (UMMs) in Queensland are members of the Association, as are a significant number of Site Senior Executives (SSEs). In NSW nearly all practising mine managers (MMEs), both open cut and underground, are members of the Association.

The Objects of our Association are:

- To advance the interests, and raise the status of members,
- To maintain members' competencies and continue their professional development,
- To improve health and safety in the workplace,
- To provide support to members in employment related issues, and
- To contribute to sustainable mine development and industry growth.

The Association plans to achieve its objectives by:

- Developing policies to support the objects of the Association, the conduct and professional development of members,

**MMAA Submission – Resources Safety and Health Qld and Other Legislation
Amendment Bill 2026**

- Organising technical seminars to advance the art and science of modern mine management theory and practice and the knowledge of members,
- Providing representation on industry committees formed to frame and/or review legislation, policy, or advice,
- Organising regular meetings or communication sessions to provide members with the opportunity to effectively network with their peers,
- Encouraging the use of risk management and other contemporary safety techniques to identify and control risks in the mining industry,
- Promoting adequate returns on mining investment as the means of causing industry growth, optimising resource recovery, and providing employment opportunities,
- Promoting sound environmental management, and sustainable development, and
- Promoting industry standardisation of competencies, maintenance of competencies and legislative requirements throughout Australia.

In addition to the above, the Association believes best safety outcomes are achieved by:

- Genuine consultation between all industry stakeholders.
- Simple, fit for purpose risk based legislation.
- The promotion of innovation and technology throughout the industry to solve technical issues; and
- The use of trained and competent personnel at all levels of a mining operation.

To this end, we have always advocated for the senior mine site officials to be the holder of a Manager of Mining Engineering competency, believing this qualification is best suited to manage the complex and often inter-related risks associated with mining operations, especially underground coal mining. For the same reasons, we also strongly advocate that inspectors, government regulators and governance committees retain people with a strong technical background to ensure regulatory oversight based on a sound understanding and application of risk-based principles as they apply to mining.

While not the focus of this review, we also believe mining related safety legislation and governance should be, where possible, harmonised across States and territories. The risks associated with mining do not recognise state borders and given many companies operate in multiple jurisdictions, simple, uniform safety legislation across all States is a sensible objective. Efforts to harmonise mine safety legislation across national jurisdictions are supported.

The Bill as proposed has missed a unique opportunity to further harmonise and align the governance structures in the two main coal mining jurisdictions, namely Queensland and NSW. As members move between states, as they often do, there is a requirement to be familiar with two sets of governance and legislation, despite managing mines with the same core risks.

Overall, the Association supports the recommendations of the Susan Johnston review, and the proposed governance structures, including the establishment of the Governing Board. As such, we will not comment on all the clauses contained in the Bill.

**MMAA Submission – Resources Safety and Health Qld and Other Legislation
Amendment Bill 2026**

We are concerned, however, at the possible membership of the Governing Board. We note that the composition of the Board proposed in the Bill is not the same as that proposed in the Susan Johnston review. The success or otherwise of the Governing Board will depend on its collective membership having a deep understanding of the technical issues as they relate to mining risks. Mining, and in particular underground coal mining, requires a broad understanding of the inter-related risks that can impact operations. Expertise in one core risk (e.g. spontaneous combustion) can be counterproductive if there is an absence of knowledge in strata control, ventilation and mine design. A wholistic approach to risk management and oversight is essential.

Our reading of the Bill causes our association concern that this deep technical knowledge may be lacking and recommends that the Bill be amended to ensure that, as well as the broad governance expertise detailed, at least two members are selected on the basis of technical expertise, mine design and mine management.

A Governing Board that lacks this expertise is compromised and will not deliver optimum safety outcomes for the industry. It is essential the Board member selection is merit based, independent and not comprised of token stakeholder representatives.

Thank you for the opportunity to comment on the proposed Bill.

Andrew Myers
President
Mine Managers Association of Australia

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Secretary.