

INQUIRY INTO COAL MINING INDUSTRY SAFETY

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**Submission to the Transport and Resources Committee –
Inquiry into Coal Mining Industry Safety**

5 October 2022

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Background

Resources Safety and Health Queensland

Resources Safety and Health Queensland (RSHQ) is an independent statutory body and the regulator of worker safety and health in Queensland's resources industry, which includes

- Coal mines
- Mineral mines and quarries
- Petroleum and gas
- Explosives.

RSHQ is established by the *Resources Safety and Health Act 2020* and is headed by the chief executive officer, who reports directly to the Minister for Resources. RSHQ's activities for 2021-22 are outlined in its annual report.¹

There are approximately 36,600 coal mine workers and 66 operating coal mines in Queensland.² Of these, 53 are open-cut coal mines and 13 are underground coal mines.

There are 40 operators of coal mines in Queensland. Three different multinational operators between them operate almost a third of Queensland's coal mines.

The legislative framework

Worker safety and health in Queensland coal mines is regulated under the *Coal Mining Safety and Health Act 1999* (the Act).

The Act is risk-based legislation, meaning it places obligations on the industry itself to ensure the safe operation of coal mining activities. Specifically, the Act creates obligations for certain persons to ensure that risk from coal mining operations is at an acceptable level.

The chief executive officer of RSHQ may appoint public service officers with appropriate competencies and adequate experience as inspectors under the Act. The coal mines inspectorate is a functional unit within RSHQ, and its operational activities are conducted from offices in

¹ <https://www.publications.qld.gov.au/ckan-publications-attachments-prod/resources/33ed65e7-ad74-4d4a-9842-a1031400e099/rshq-annual-report-2021-2022.pdf?ETag=bad070c54bf334e2b10bc0e3c7fe5c8c>

² As at 30 September 2022

Mackay and Rockhampton. The chief inspector and deputy chief inspector are located in Brisbane.

The Grosvenor serious accident and establishment of the board of inquiry

At approximately 3pm on 6 May 2020, an ignition of methane occurred at the longwall face at Grosvenor mine, located at Moranbah in the Bowen Basin. The resulting explosion caused serious burn injuries to five workers (the serious accident).

On 22 May 2020, the then Minister for Natural Resources, Mines and Energy, the Honourable Dr Anthony Lynham, established a board of inquiry under section 202 of the Act, to inquire into the serious accident, as well as 40 methane exceedance high potential incidents (HPIs) that occurred at various Queensland underground coal mines between 1 July 2019 and 5 May 2020. In advising the parliament of his decision to establish the board, the Minister said: “the board of inquiry is to make recommendations for improving safety and health practices and procedures to mitigate against the risk of these incidents happening again”³.

The board’s initial terms of reference were notified by gazette notice on 22 May 2020⁴ and appointed retired District Court Judge Mr Terry Martin SC as chairperson and Professor Andrew Hopkins AO as a member. On 23 June 2020⁵, by extraordinary gazette notice, the board’s membership was amended, replacing Professor Hopkins with Mr Andrew Clough as a member. On 17 September 2020⁶, the board’s terms of reference were amended, extending the initial report-back date of 30 November 2020 to 31 May 2021.

The board conducted two blocks of public hearings, the first between 4 and 21 August 2020, and the second between 9 March and 9 April 2021. The board heard from representatives of industry and unions; coal mine workers including workers injured in the serious accident; technical experts; and inspectors and other officers of RSHQ.

³ Hansard, 21 May 2020, p1056

⁴ https://www.coalminesinquiry.qld.gov.au/data/assets/pdf_file/0019/1621081/Board-of-Inquiry-Estab-Terms-of-Reference.pdf

⁵ https://www.coalminesinquiry.qld.gov.au/data/assets/pdf_file/0019/1621108/Extraordinary-Gazette-Board-Membership-change.pdf

⁶ https://www.coalminesinquiry.qld.gov.au/data/assets/pdf_file/0009/1620909/17.09.20-11-Extra-Gazette.pdf

Outcomes of the board of inquiry

Overview of the board's key findings and recommendations

The board published an interim report on 31 August 2020 and its final report in two parts:

- part I on 30 November 2020 contained 25 recommendations
- part II on 31 May 2021 contained a further 40 recommendations.

Of the 65 recommendations:

- 30 were directed at the coal mining industry (in general or to operators of specific mines, including three recommendations specifically for Grosvenor mine)
- 30 were made to RSHQ
- three were made to the Coal Mining Safety and Health Advisory Committee (CMSHAC) established under the Act
- two were made to industry safety and health representatives of the Mining and Energy Union (MEU).

Recommendations for the coal mining industry

The board made 27 recommendations for the coal mining industry as a whole, as well as three 3 recommendations specifically directed at Grosvenor mine. Twelve recommendations are concerned with technical aspects of managing particular underground hazards or risks such as methane or spontaneous combustion. However, the board directed a number of recommendations at organisational factors for coal mining operations, which touch on corporate or business arrangements and behaviours. Accordingly, these may be said to potentially impact industry culture towards safety. For their industry-wide, long-run focus, these recommendations may be described as strategic and may be summarised in the following themes:

- a. the competing priorities of coal production rates and worker safety
- b. the impact of production and safety bonuses and incentives on worker safety
- c. appropriate and effective incident reporting
- d. the safety implications of the use of labour hire
- e. general site safety; and the distinction between process safety and personal safety.

On 23 February 2021, following publication of the board's part I report, the Minister for Resources, the Honourable Scott Stewart MP, wrote to the Queensland Resources Council (QRC) chief executive, Mr Ian Macfarlane, seeking an action plan for progressing the board's

recommendations to industry.

On 15 June 2021, in a statement to the parliament,⁷ Minister Stewart confirmed his expectation that an action plan also be devised for recommendations and findings in the board's part II report. The Minister also called upon industry to "fully investigate the extent and nature of ... bonus schemes and whether they place appropriate focus on managing safety risks to workers".

On 28 July 2022, Chief Inspector of Coal Mines, Mr Peter Newman, wrote to all site senior executives (SSEs) of Queensland underground coal mines⁸ raising concerns about a lack of visible planning or action, at site level, for implementing the board's recommendations. The chief inspector provided SSEs with a template document for tracking their progress on recommendations and requested updates by the end of October 2022.

Recommendations for industry safety and health representatives of the MEU and CMSHAC

The board made one recommendation to industry safety and health representatives (ISHRs) – officials appointed by the MEU – and one to the MEU itself, about improving participation of site safety and health representatives (SSHRs) in on-site safety matters and improving functional relationships between ISHRs and SSHRs. SSHRs are representatives elected by workers at site under the Act.

The board made recommendations to CMSHAC about training and competencies; and making incident reporting a focus of its strategic plan.

Recommendations for RSHQ

RSHQ received 30 recommendations:

- 15 recommended that RSHQ 'take steps' to amend legislation
- one explicitly recommended retaining existing legislative arrangements (relating to industry safety and health representatives)
- seven concerned inspectorate practice or procedure
- six recommended consideration of changes to, or introduction of new, recognised standards (instruments made by the Minister under the Act providing ways to manage

⁷ Hansard 15 June 2021, p 1783

⁸ Attachment 1 – chief inspector's letter to underground coal mine site senior executives

risk).

RSHQ has accepted all of the 30 recommendations it received from the board of inquiry.

Proposals to progress the 15 recommendations concerning legislative amendment are outlined in a regulatory impact statement which was released for public consultation on 23 September 2022.⁹ It is envisaged that a resulting bill will be introduced in the parliament in late 2023 and will be referred to this committee for consideration.

The seven recommendations concerning inspectorate practice or procedure either endorsed existing practice or recommended minor enhancements. These are predominantly technical in nature and are currently being progressed within the inspectorate.

Work to implement the recommendations about new or amended recognised standards is being undertaken by recognised standard tripartite working groups in accordance with an established consultative development procedure. The procedure and recognised standards, which have been approved by the Minister for review or development, are published on the Business Queensland website.¹⁰

RSHQ's progress on the recommendations it received is outlined in attachment 2 to this submission.

⁹ <https://www.rshq.qld.gov.au/about-us/resources/public-consultation>

¹⁰ <https://www.business.qld.gov.au/industries/mining-energy-water/resources/safety-health/mining/legislation-standards/recognised-standards/rstwg>

Attachments

Attachment 1 - chief inspector's letter to underground coal mine site senior executives



Resources Safety & Health
GPO Box 1321
Brisbane QLD 4001
www.rshq.qld.gov.au

28 July 2022

Dear Underground Site Senior Executive

Re: Implementation of Queensland Coal Mining Board of Inquiry Industry Recommendations

It has now been 14 months since the Queensland Coal Mining Board of Inquiry published its second and final report on the serious accident that occurred at Grosvenor mine on 6 May 2020, which resulted in serious injuries to five coal mine workers, and high potential incidents that occurred at Grosvenor mine and other underground coal mines, between 1 July 2019 and 5 May 2020, involving exceedances of methane. The board directed 30 recommendations to the coal mining industry, three of which were directed specifically at the Grosvenor mine.

My recent engagement with some SSEs at underground coal mines has raised a concern that none that I have spoken with have a clear implementation plan for recommendations made to industry. While some SSEs have referred to work being done at a corporate level, and external agency reviews of current activities against the board's recommendations, none has produced an implementation plan, clearly indicating which recommendations will be adopted at their mine, allocated resources, individuals responsible for tasks and the due date for implementation.

Reflecting on the recommendations made from inquiries into the Moura No2 and No4 mining disasters – which have seen the industry take approximately 26 years to fully implement – we collectively need to ensure that the BoI recommendations are implemented in a timely manner.

It is incumbent on us all to ensure that the lessons from the gas exceedances in the industry and the explosion at Grosvenor on 6th May 2020 are not forgotten and the BoI recommendations are implemented as relevant to your operation.

Recently some SSEs requested I share the implementation tracker RSHQ is using for recommendations made to RSHQ, so SSEs could use a similar format. I have attached the implementation tracker containing relevant industry recommendations for your use or to adapt to your own format. I will be monitoring industry's efforts to implement BoI recommendations and so will seek regular updates on your site's progress. To this end, I request that you provide me with your mine's implementation tracker/plan, setting out:

- recommendations you are implementing,
- the actions you are taking to implement them,
- the timeframe for full implementation, and
- status on implementation progress for each recommendation.

I request that these plans are submitted to my office by the end of October 2022.

Regards



Peter Newman
Chief Inspector of Mines

Att: [BoI Industry Recommendations Implementation Tracker](#)

Attachment 2 – RSHQ recommendations

Rec no.	Made to	Recommendation	Status
Part I report			
1	Industry	Mine operators and parent companies regard, and action, a reportable methane exceedance as having a potential consequence of level 4 or 5 under corporate incident classification criteria.	
2	Industry	Mine operators and parent companies escalate the treatment of repeat high potential incidents of a similar nature and ensure a more rigorous investigation than for a single high potential incident. Reporting and investigation standards and procedures formally reflect this requirement.	
3	RSHQ	RSHQ, in consultation with the Public Service Commission, undertakes a review of remuneration for inspectors: <ul style="list-style-type: none"> a. to ensure that such remuneration is structured to attract and retain suitably qualified and experienced persons for such positions; and b. to provide a financial incentive for inspectors to study to obtain a First-Class Certificate of Competency. 	Completed
4	RSHQ	RSHQ continues to implement the three stage process for improvement in efficiency in the management of HPIs.	Completed
5	RSHQ	RSHQ continues to monitor and report the Serious Accident Frequency Rate and the HPI Frequency Rate.	Completed
6	RSHQ	RSHQ audits and reports on the proper identification and effective implementation of critical controls associated with the management of principal hazards. In particular, RSHQ focuses on the auditing of critical controls associated with the gas principal hazard management plan.	Ongoing
7	Industry	Mine operators and parent companies classify all methane exceedances at or above 2.5% concentration in the general body as HPIs for internal incident reporting purposes.	
8	Industry	Mine operators and parent companies treat such methane exceedances as indicating that a critical control may have failed, and undertake an investigation into the performance of the relevant critical control to determine if that is so.	
9	Industry	Mine operators and parent companies ensure that such methane exceedances are formally notified as soon as possible to senior executives of the parent company.	
10	Industry	Mine operators and parent companies ensure adequate spare capacity in goaf drainage systems, above the predicted maximum methane emissions.	
11	Industry	The industry and the QMRS consult to determine whether it is viable for the QMRS to provide self-escape training for all underground coal mine workers, as well as generic inductions, site-specific inductions and refresher training.	
12	RSHQ	RSHQ takes steps to amend the Regulation to provide that the training scheme required by section 82(3) must cover the provisions of the Act and Regulation, including the safety and health obligations imposed by Part 3 of the Act.	Part of RSHQ legislative program: regulatory impact statement released for consultation on 23 September 2022
13	RSHQ	RSHQ takes steps to amend the Act to require that the person left in charge of an underground coal mine in the absence of the UMM must hold either a First or Second Class Certificate of Competency.	
14	RSHQ	RSHQ takes steps to amend the Act to require that an SSE for an underground coal mine must be the holder of a First-Class Certificate of Competency.	
15	RSHQ	RSHQ takes steps to amend the Act to require that a person appointed to act as the SSE for an underground coal mine, during an SSE's absence of more than 14 days, must be the holder of a First or Second-Class Certificate of Competency.	
16	CMSHAC	The Coal Mining Safety and Health Advisory Committee (CMSHAC) includes the RIIWHS601E competency (Establish and maintain the WHS management system) as a competency required to be held by an SSE.	
17	RSHQ	RSHQ takes advice as required and, if necessary, takes steps to amend the Act to clearly reflect that a parent company holds obligations under section 39.	Part of RSHQ legislative program: regulatory impact statement released for consultation on 23 September 2022
18	Industry	The industry adopts strategies and performance measures to address process safety and personal safety separately	

Rec no.	Made to	Recommendation	Status
19	RSHQ	RSHQ takes steps to amend the Act and Regulation to require a coal mine to develop a set of critical controls with performance criteria which must be incorporated into Principal Hazard Management Plans (PHMPs), and which require: <ul style="list-style-type: none"> a. the SSE to notify the Regulator in the event of a failure of the critical control to meet its performance criteria; b. the SSE to monitor the effectiveness of the critical controls, and report the results to the mine operator, on a monthly basis; and c. coal mine operators to audit critical controls as part of the audit prescribed by section 41(1)(f) of the Act. 	Part of RSHQ legislative program: regulatory impact statement released for consultation on 23 September 2022
20	RSHQ	RSHQ, in consultation with the industry, advise the Minister on proposed content for a recognised standard for the implementation of critical control management, based on the International Council on Mining and Metals (ICMM) Good Practice Guide and ICMM Implementation Guideline.	Recognised standard tripartite working group has been established and commenced work to review RS02 'Control of risk management practices'
21	RSHQ	RSHQ audits the effectiveness and implementation of critical controls associated with a mine's PHMPs at regular intervals and publishes results of these audits in its Annual Safety Performance and Health Report.	Ongoing
22	CMSHAC	The CMSHAC works with registered training organisations to include CCM in the standard risk management training packages (particularly RIIRIS601E).	
23	Industry	The industry gives lead safety indicators greater weight than lag safety indicators when measuring safety performance.	
24	Industry	The industry gives lead safety indicators greater weight than lag safety indicators in the determination of executive bonuses	
25	RSHQ	RSHQ takes advice as required, and if necessary, takes steps to amend Part 3A of the Act so that it reflects Parliament's intention with regard to: <ul style="list-style-type: none"> a. strengthening the safety culture in coal mining and ensuring consistency in how deaths of workers on work sites are treated; and b. who should be liable to prosecution. 	Part of RSHQ legislative program: regulatory impact statement released for consultation on 23 September 2022
Part II report			
1	Industry (Grosvenor mine)	In light of the Board's finding that mining operations were repeatedly conducted in a manner whereby the gas emissions being generated by the rate of production were in excess of the capacity of the mine's gas drainage system, Grosvenor mine management: <ul style="list-style-type: none"> a. audits and reviews the effectiveness and implementation of the principal hazard management plans for gas management and methane drainage, to ensure that, in future, the risk to persons from coal mining operations is at an acceptable level. b. reviews the effectiveness of the mine's operational practices and management systems, to ensure that, in future, production rates are adjusted to match a realistic PDCE and the actual peak specific gas emissions; and c. carries out detailed gas reservoir analysis to identify opportunities for gas pre-drainage, or other means of capture of gas before entering longwall workings, and specifically that this analysis include the FH, QA and QB seams. 	
2	Industry	Prior to the commencement of each longwall panel, coal mines arrange a review, to be validated by a third-party independent engineering study: <ul style="list-style-type: none"> a. to ensure that adequate gas pre-drainage has been implemented, taking into account a margin for error in any predictive modelling; and b. to ensure that adequate post-drainage capabilities are in place, taking into account a margin for error in any predictive modelling. 	
3	Industry	In light of the evidence that gas emission modelling is inherently flawed, with a high margin of error, coal mines, at the time of undertaking second workings risk assessments: <ul style="list-style-type: none"> a. Critically assess and scrutinise any gas emission modelling for an upcoming longwall panel. The assessment should include a review of the model's predictive accuracy for previous longwalls; b. Take steps to satisfy themselves that sufficient pre-drainage has in fact been undertaken to the extent reasonably necessary to reduce gas emissions to a safe level; c. Ensure post-drainage systems are designed: 	

Rec no.	Made to	Recommendation	Status
		<ul style="list-style-type: none"> i. with sufficient redundancy to cope with peak gas emissions, including a factor of safety in drainage capacity, and allowing for system failures; and ii. in such a way that the risk of spontaneous combustion is not increased by oxygen ingress to the goaf; <p>d. Ensure ventilation systems are designed in such a way as to ensure they work in combination with the post-drainage system to dilute predicted peak gas emissions to levels that achieve an acceptable level of risk.</p>	
4	Industry	Coal mines regularly assess production rates and adjust them as necessary to ensure they do not result in gas emissions exceeding the capacity of the gas drainage system.	
5	RSHQ	Resources Safety & Health Queensland (RSHQ) reviews its risk profiling and response practices with a view to ensuring that it operates as a proactive regulator.	Ongoing
6	RSHQ	<p>The Board repeats its recommendation made in the Part I Report, Chapter 6, recommendation 19, that:</p> <p>RSHQ take steps to amend the <i>Coal Mining Safety and Health Act 1999 (Qld)</i> (the Act) and the <i>Coal Mining Safety and Health Regulation 2017 (Qld)</i> to require a coal mine to develop a set of critical controls with performance criteria which must be incorporated into Principal Hazard Management Plans, and which require:</p> <ul style="list-style-type: none"> a. the Site Senior Executive (SSE) to notify the Regulator of a failure of a critical control to meet its performance criteria. b. the SSE to monitor the effectiveness of the critical controls, and report the results to the mine operator, on a monthly basis; and c. coal mine operators to audit critical controls as part of the audit prescribed by section 41(1)(f) of the Act. 	Part of RSHQ legislative program: regulatory impact statement released for consultation on 23 September 2022
7	Industry (Grosvenor mine)	Grosvenor develop a set of TARP triggers for spontaneous combustion in the active goaf with respect to the goaf stream.	
8	Industry (Grosvenor mine)	Grosvenor review the TARPs for goaf wells and include a requirement for the taking of regular bag samples under 'Normal' TARP conditions.	
9	Industry	Coal mines include the carbon monoxide (CO) reporting to the goaf wells with that measured in the longwall return when calculating the total CO Make for the active goaf.	
10	RSHQ	Resources Safety & Health Queensland takes steps, through the consultative process provided by the Coal Mining Safety and Health Advisory Committee, to ensure that a Recognised standard based on best practice is developed for the monitoring and control of spontaneous combustion in underground coal mines.	Recognised standard tripartite working group has been established and commenced work in relation to a potential new recognised standard
11	Industry	Coal mines provide all workers who go underground with personal proximity devices that allow location tracking, and are active, for the entire time the workers are underground.	
12	Industry	Coal mines implement a management practice for oxygen concentrations at goaf drainage wells to be maintained at no greater than 5%, and less if necessary, depending on site-specific conditions.	
13	Industry	Coal mines conduct a thorough risk assessment for the use of polymeric chemicals, especially polyurethane resins, which includes a consideration of the risk of spontaneous combustion of coal being initiated by the product, before introduction and application at site.	
14	Industry	The industry undertake research into polyurethane resins to determine the extent to which their use poses a risk of initiating spontaneous combustion of coal.	

Rec no.	Made to	Recommendation	Status
15	RSHQ	Resources Safety & Health Queensland takes steps to ensure that Recognised standard 16 is reviewed through the consultative process provided by the Coal Mining Safety and Health Advisory Committee, and that consideration is given to including a requirement within the standard that Site Senior Executives ensure a risk assessment is conducted in respect of the potential hazard arising from polymeric chemicals heating adjacent coal, resulting in spontaneous combustion.	Recognised standard tripartite working group has been established and commenced work to review RS16 'The use and control of polymeric chemicals at underground coal mines'
16	Industry	Coal mines, in particular those working the GM seam, assess the risk of spontaneous combustion and consider designing and implementing proactive inertisation as a measure to deal with that risk.	
17	Industry	Coal mines review the ventilation arrangements it has in place around the active goaf, with the view to identifying opportunities to reduce oxygen ingress to the goaf.	
18	Industry	The industry undertake research, including field studies, into the simultaneous operation of goaf drainage systems and continuous inertisation.	
19	Industry	Coal mines review their site induction procedures to ensure that all new workers at the mine, including labour hire workers and contractors, are fully informed about the fundamental importance of the reporting of safety concerns, including occupational health hazards, and assured that reprisals will not be taken in response. This will include ensuring that all new workers at the mine are aware of and understand the operation of sections 274, 275, 275AA and 275AB of the Act.	
20	RSHQ	RSHQ takes steps, through the consultative process provided by CSMHAC, to include a component in the generic induction for coal mine workers (<i>Recognised standard 11: Training in Coal Mines</i>) on the roles of the Industry Safety and Health Representative and Site Safety and Health Representative, so as to promote awareness of the functions of each.	Recognised standard tripartite working group has been established and commenced work to review RS11 'Training in coal mines'
21	Industry	Mine operators review their contracts with labour hire agencies and include, where necessary, provision for a documented process by which performance management issues, and grievance issues, in respect of labour hire workers are addressed.	
22	Industry	The industry reviews its production and safety bonus structures and make any necessary changes to ensure that those structures do not inadvertently discourage the reporting of safety incidents or injuries.	
23	RSHQ	Similarly to the SSE's obligations under sections 106(1)(a), (b) and (c) of the Act, RSHQ takes steps to amend the Act to require the SSE at a mine to inform the management of a labour hire agency which has employees at the mine when the following events occur, as soon as practicable after the event comes to the SSE's knowledge: <ul style="list-style-type: none"> a. an injury or illness to an employee of the labour hire agency from coal mining operations that causes an absence from work of the person; b. a high potential incident happening at the coal mine; c. any proposed changes to the coal mine, or plant or substances used at the coal mine that affect, or may affect, the safety and health of persons at the mine. 	Part of RSHQ legislative program: regulatory impact statement released for consultation on 23 September 2022
24	RSHQ	RSHQ takes steps to amend the Act to require labour hire agencies to notify the Regulator of a serious accident, an HPI of a type prescribed under a regulation, or a death at a coal mine, involving their employees.	Part of RSHQ legislative program: regulatory impact statement released for consultation on 23 September 2022
25	RSHQ	Without diminishing the burden, or extent, of obligations imposed on others under the Act, RSHQ takes steps to amend the Act to impose a safety and health obligation on labour hire agencies which supply workers to a mine, in similar terms to section 19 of the NSW Act.	Part of RSHQ legislative program: regulatory impact statement released for consultation on 23 September 2022
26	CSMHAC	When submitting a panel of names of individuals experienced in coal mining operations as nominees for membership of CSMHAC under section 79 of the Act, organisations representing coal mine operators should ensure the panel includes representatives of labour hire agencies.	

Rec no.	Made to	Recommendation	Status
27	RSHQ	Consistently with Part 7 of the MQSHA and Part 5 of the WHS Act, RSHQ takes steps to amend the Act to enable the formation of safety committees upon request by an SSHR or when directed by the Chief Inspector.	Part of RSHQ legislative program: regulatory impact statement released for consultation on 23 September 2022
28	CMSHAC	As part of carrying out its functions under section 76A of the Act, CMSHAC considers including within its 5-year Strategic Plan activities that will facilitate improvements in the reporting culture in Queensland coal mines.	
29	RSHQ	RSHQ takes advice, as required, and if necessary, takes steps to amend section 275AA of the Act to clarify the application of the reprisal offence, with a view to strengthening protections for workers. For example, this may involve including a definition of 'detriment'.	Part of RSHQ legislative program: regulatory impact statement released for consultation on 23 September 2022
30	RSHQ	In relation to reprisal complaints, the Inspectorate undertakes prompt and thorough investigations, and provides appropriate feedback to complainants during the investigation and prosecution process.	Ongoing
31	RSHQ	The current model of appointment of ISHRs be retained.	No further action
32	RSHQ	RSHQ takes steps to amend the <i>Coal Mining Safety and Health Regulation 2017 (Qld)</i> , schedule 1B 'Site safety and health representative election process', clause 13(6), to require the returning officer for a ballot in respect of the election of an SSHR to give notice of the result of the ballot to the ISHRs.	Part of RSHQ legislative program: regulatory impact statement released for consultation on 23 September 2022
33	Industry	The ISHRs take a more proactive role in cultivating mutually beneficial relationships with SSHRs.	
34	RSHQ	RSHQ takes steps to amend section 119(1)(c) of the Act to permit copying of all documents amenable to examination under that provision.	Part of RSHQ legislative program: regulatory impact statement released for consultation on 23 September 2022
35	RSHQ	RSHQ takes steps, through the consultative process provided by the Coal Mining Safety and Health Advisory Committee, to include a component on the roles of SSHRs and ISHRs in the <i>Recognised standard 11: Training in coal mines</i> , so as to promote awareness of the availability of both functions.	Recognised standard tripartite working group has been established and commenced work to review RS11 'Training in coal mines'
36	RSHQ	The Inspectorate reinstates the practice of sending MREs to ISHRs.	Completed
37	Industry	The Construction, Forestry, Maritime, Mining and Energy Union and management at coal mines encourage coal mine workers to nominate for election as an SSHR.	
38	RSHQ	Consistently with Recommendation 35, Resources Safety & Health Queensland (RSHQ) takes steps, through the consultative process provided by the Coal Mining Safety and Health Advisory Committee to include information about the importance and nature of the role of SSHRs in the generic induction for coal mine workers, <i>Recognised standard 11: Training in coal mines</i> .	Recognised standard tripartite working group has been established and commenced work to review RS11 'Training in coal mines'
39	Industry	Coal mines use their work order system to schedule and record the completion of an SSHR inspection to assist with incorporating the inspection activity into the mine's weekly plan, and to demonstrate management support for the SSHR function.	
40	Industry	Site Senior Executives consider whether it would be advantageous to make the SSHR role at their mine a full-time position.	