

Safety Alert

Mines Inspectorate

Safety Alert No. 270
30 June 2011

Managing underground coal mine contractors — *alarm bells are ringing!*

Mine type: Underground coal mine | **Equipment:** None

Hazard: Contractors who are not competent and do not understand the underground environment or do not respect the robust safety disciplines necessary to maintain an acceptable level of risk

Incidents: The following recent incidents have raised serious concerns about how contractors are being managed in underground coal mines:

1. **Violation of a mine's A9 keys allocation and security system:** In 2010 a deputy found a contractor operating an LHD in the tailgate in a gassy environment, with the methane monitor bypassed using a duplicated and unauthorised A9 Deputy key. To make matters worse, the deputy did not report the matter to the underground mine manager.
2. **Violation of a mine's A9 keys allocation and security system:** Recently, underground contract fitters were found with duplicated and unauthorised A9 Deputy keys, allegedly provided by their supervisor, which enabled methane monitors to be bypassed.
3. **Unauthorised restart of an auxiliary fan** (see Safety Alert 268): Recently, a contract electrician, unaware he was contravening any statutory regulation or site rules, reset power to an auxiliary fan and then restarted it without being authorised by the ventilation officer, or consulting the ERZ Controller or others that may have been affected.
4. **Non-compliant management structures:** Some mines had mining contractors reporting directly to the site senior executive rather than through the underground mine manager, which effectively undermined the latter's legislative responsibility to 'control and manage the mine'.
5. **Substandard incident investigation:** A mine's investigation into a recent contractor incident found the contractor guilty of major organisational deficiencies and non-compliances, yet did not recognise its own failure to effectively manage contractors according to the mine's Safety and Health Management System (SHMS).

Causes:

- inadequate training
- inexperience
- poor management of contractors
- inadequate incident investigation
- non-compliance with legislation

Comments: As industry expands and strains the availability of experienced and qualified human resources, the use of inexperienced labour and of contractors is increasing. As a result, underground coal mining's corporate memory of its painful past, the evolution of robust mining legislation and the strict discipline of the underground miner are at risk of being diluted. ***Mining staff and management need to realise that the underground environment will not be kinder as mines become deeper.***

The first three incidents above are totally at odds with underground coal mining culture and seriously undermine confidence in the industry's ability to manage contractors effectively and maintain an acceptable level of risk. All these incidents prompt the following serious questions:

- How can a mineworker, electrician or mechanic be deployed underground without supervision and without understanding the basics of the underground environment, including the implications of starting an auxiliary fan and why it is subject to strict procedures?
- Why do we have contractors ignorant of mining legislation and minesite discipline to such an extent that they deliberately fabricate A9 keys to defeat a critical safety control?
- Why are some mines seeking to confine the underground mine manager to a 'safety compliance' role when legislation requires the underground mine manager to 'control and manage the mine'?
- How can a mine's investigation into a 'contractor incident' identify contractor deficiencies and not recognise its own serious shortcomings in managing the contractor?
- Should we re-examine the present 'one size fits all' system to make it harder for keys to fall into the wrong hands?

Recommendations:

1. That the underground mine manager control and manage the mine as required by legislation as distinct from being restricted to performing a safety compliance role.
2. That all mineworkers be adequately trained to understand and respect the underground environment and the safety disciplines that apply.
3. That it be recognised that the task of managing contractor personnel, including effectively integrating their activities into the mine's SHMS, is a significant challenge that requires adequate resourcing and close attention.
4. That contractors' activities be adequately inspected, audited and controlled.
5. That Deputy bypass keys be kept strictly for deputies and **not** be issued to anyone else, including electricians.
6. That consideration be given to a new security system for the allocation of A9 keys.
7. That the Chief Inspector of Coal Mines' directive of March 2007 — requiring that one of the senior positions in the management structure be responsible for the overall management of contractors operating at the mine — be complied with.
8. That electricians **not** be deployed to work underground without supervision, until they have the necessary competence and experience.
9. That contract deputies inspect and report on compliance with legislation and the mine's SHMS.
10. That mines comply with legislation.

Gavin Taylor Chief Inspector of Coal Mines

Contact: Mike Walker, District Inspector of Mines, +61 7 4938 4121

Please ensure all relevant people in your organisation receive a copy of this safety alert. Any such advice supplied to site should reach those who require it, and it should also be placed on the mine noticeboards. See more safety alerts and bulletins at www.dme.qld.gov.au/mines/safety_information__bulletins.cfm