



**Mining and Resource
Contractors Safety
Training Association**

COMMENT TO WA INDUSTRIAL RELATIONS COMMISSION

*On issues arising from the terms of reference for the
Review of the Mines Safety and Inspection Act 1994*

Comment to Commissioner S J Kenner, Western Australian Industrial
Relations Commission by the Mining and Resource Contractors Safety
Training Association (MARCSTA)

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COMMENT TO WA INDUSTRIAL RELATIONS COMMISSION

On issues arising from the terms of reference for the Review of the Mines Safety and Inspection Act 1994

SUMMARY OF CONCLUSIONS

Application of the Current Legislation to Rail Safety

MARCSTA sees no plausible reason why a national regime for rail safety should be opposed provided the occupational safety and health standards currently enjoyed by Western Australia's workforce are not diminished in any way in the process.

Application of the Current Legislation to Mine Sites during Construction

The current flexible working arrangements with regard to construction activities on mine sites are working and adequate. Any proposal for change would need to be justified on the basis that it would result in a higher standard of occupational safety and health for workers engaged in construction activities than is available to them today.

Interaction with Other Occupational Safety and Health Legislation - State

There is no conflict between the two occupational safety and health acts in Western Australia and the reasons for maintaining separate legislation remain valid. The mining industry is the standard-setter for safety and health achievement for its workforce.

Interaction with Other Occupational Safety and Health Legislation - National

Provided that the process of national harmonization does not result in a weakening of occupational safety and health provisions currently applying in Western Australia, this Association remains positive to the process.

Concessions granted, however, for political expedience that have the potential to jeopardize the standards of occupational health and safety existing in Western Australia at this time, must be vigorously opposed.

Goals and Strategies of the National Mine Safety Framework and the Draft Model Legislation

The current Western Australian legislation, which has been in place since 1994, has proven workable and durable. It follows closely the model recommended by the Robens Committee, that is, an Act containing a clear statement of basic principles and a simple consultation process.

A National Mine Safety Framework and Model Legislation need not go beyond the three strategies outlined. Consistency in the implementation of those strategies could be enough to provide an adequate national approach.

Outstanding Recommendations from the Laing Report MSIA Part 3

The range and flexibility of personnel in the inspectorate is adequate to carry out its responsibilities.

Flexibility in the appointment and utilization of inspectorial personnel will not be possible until the real problems of remuneration and consequent retention are addressed.

Outstanding Recommendations from the Laing Report MSIA Part 4

The issues of:

- Boards of Examiners;
- Certificates of Competency – educational qualifications;
- Conduct of Examinations; and
- Need for qualifications/practical experience;

should all be fully canvassed with operational personnel responsible for the safety and health of the workforce which is the primary object of the Mines Safety and Inspection Act: *“...to promote, and secure, the safety and health of persons engaged in mining operations.”*

Decisions taken in the interests of harmonisation should not lose sight of the primary object of the legislation.

The Introduction of a Safety Case Regime for the Mining Industry

When situations that meet the usual criteria are identified in the mining industry it would be appropriate to require the development of a safety case for that operation/facility and there may well be a need to make some provision in the Mines Safety and Inspection Act to give the required level of regulatory capacity for that purpose. This would enable the preparation of appropriate design and process reviews and checks by third parties with the cost to be met by the proponent prior to construction and commissioning.

Alternately, a separate piece of legislation could be developed to allow proponents of any major industrial facility to elect a safety case option to apply to that facility or operation.

No credible justification for dispensing with the existing regulatory structure has ever been put forward.

INTRODUCTION

The safety achievements of the mining industry under the Mines Safety and Inspection Act have been documented and provided to you and it is not the Association's intention to comment further.

Western Australia hosts one of the safest and healthiest mining workforces in the world today and is recognised as such internationally (see *Minesafe Proceedings* 1990, 1993, 1996, 1998, 2000).

The writer was General Secretary/Deputy Chief Executive Officer of the Chamber of Minerals and Energy from 1982-1999 with responsibility for the industry occupational safety and health portfolio during that period.

In 2002 the writer was made a member (AM) in the general division of the Order of Australia for his services to occupational health and safety in the mining industry.

He spent 16 years on the *WorkSafe Western Australia Commission* as an industry representative and latterly as an independent expert. He was awarded a Centenary Medal in 2003 for services to the Commission.

MARCSTA is an acronym for the Mining and Resource Contractors Safety Training Association which was established in 1996. (See Appendix)

It is a non-profit contractor safety training organisation with the following objectives:

- To develop and implement safety and health training programs for contractors working within the resources industry.
- To promote the improvement of safety standards in the resources industry.
- To monitor the changing needs of the resources industry in accordance with the relevant statutory authorities.

The writer has been Chief Executive Officer/Director of Safety and Health since 1999.

ACHIEVEMENTS

By the end of 2008 the Association will have delivered 200,000 general safety inductions to persons seeking employment or employed in the mining and associated industry sectors.

By the end of 2008 MARCSTA will have delivered **200,000** general safety inductions

CURRENT SCOPE OF TRAINING PROGRAMS

Accredited Courses Code	Name	Details
30215QLD	Course in General Safety Induction (Construction Industry)	Registered for training and assessment in WA
51466	Course in Safety Awareness Training	Registered for training and assessment in WA
Units Code	Name	Details
BCCCM1001B	Follow OH&S policies and procedures	Registered for training and assessment in WA
BSBCM106A	Follow workplace safety procedures	Registered for training and assessment in WA
BSBCM211A	Participate in workplace safety procedures	Registered for training and assessment in WA
BSBCM421A	Assist with compliance with OHS and other relevant laws	Registered for training and assessment in WA
BSBOHS301A	Apply knowledge of OHS legislation in the workplace	Registered for training and assessment in WA
BSBOHS303A	Contribute to OHS hazard identification and risk assessment	Registered for training and assessment in WA
BSBOHS304A	Contribute to OHS hazard control	Registered for training and assessment in WA
BSBOHS307A	Participate in OHS investigations	Registered for training and assessment in WA
BSBOHS403A	Identify hazards and assess OHS risks	Registered for training and assessment in WA
BSBOHS404A	Contribute to the implementation of strategies to control OHS risk	Registered for training and assessment in WA
MNMCCCO002A	Work Safely	Registered for training and assessment in NSW, QLD, WA, TAS
MNMCCCO005A	Apply local risk control processes	Registered for training and assessment in NSW, QLD, WA, TAS
RIIG001A	Work safety and follow OHS policies and procedures	Registered for training and assessment in NSW, QLD, WA, TAS
TDTF1097B	Apply fatigue management strategies	Registered for training and assessment in NSW, QLD, WA, TAS
TDTF197B	Follow OHS procedures	Registered for training and assessment in NSW, QLD, WA, TAS

REVIEW OF THE MINES SAFETY AND INSPECTION ACT

Responses by this Association to the Review are provided in the item order detailed in the invitation dated 10 October 2007.

Application of the Current Legislation to Rail Safety

This particular issue does not directly concern the members of this Association but is relevant, in Western Australia, to the iron ore industry. The views of that sector are likely to be expressed by the parties directly concerned or through the Chamber of Minerals and Energy WA.

It is our understanding, however, that there are federal proposals to revise the Rail Safety Act in order to standardise rail safety legislation nationally. Should this harmonisation eventuate, MARCSTA would be concerned to ensure that occupational safety and health provisions equivalent to those covering mine workers in Western Australia be incorporated in any such legislation.

Conclusion

MARCSTA sees no plausible reason why a national regime for rail safety should be opposed provided the occupational safety and health standards currently enjoyed by Western Australia's workforce are not diminished in any way in the process.

Application of the Current Legislation to Mine Sites during Construction

The current flexible arrangements that allow DOCEP Resources Safety and WorkSafe to provide the necessary level of regulation of construction activities on mine sites are both adequate and appropriate and should continue.

Historically the State Mining Engineer made a determination, based on the type and scope of the proposed construction, as to whether the mines inspectorate was capable and available to provide the necessary coverage on mine sites. As a professional safety and health regulator his first priority was to ensure the safety and health of the workforce. Whenever there was an evident need for specialists beyond the resources available the construction activity was placed under the control of WorkSafe.

The increase in the amount and diversity of construction activities in recent times has necessitated a close and flexible working relationship to exist between the two regulatory wings of DOCEP. This current increased level of construction activity will ultimately decline as the commodity demand abates.

It is important to remember that the Mines Safety and Inspection Act 1994 was written with a keen awareness of the need for consistency with the Occupational Safety and Health Act 1984. To all intents and purposes this was systematically achieved. Both Acts are true to the Robens philosophy of consultation and cooperation and have required little significant amendment apart from furthering the original intent of the legislation.

Today the mining industry is the best performed industry sector in occupational safety and health in the Western Australian economy.

Conclusion

The current flexible working arrangements with regard to construction activities on mine sites are working and adequate. Any proposal for change would need to be justified on the basis that it would result in a higher standard of occupational safety and health for workers engaged in construction activities than is available to them today.

Today the mining industry is the best performed industry sector in occupational safety and health in the WA economy.

INTERACTION WITH OTHER OCCUPATIONAL SAFETY AND HEALTH LEGISLATION

The Ministerial request for the Commissioner to include “interaction with other occupational safety and health legislation” gives no guidance as to whether such interaction refers to state or federal legislation.

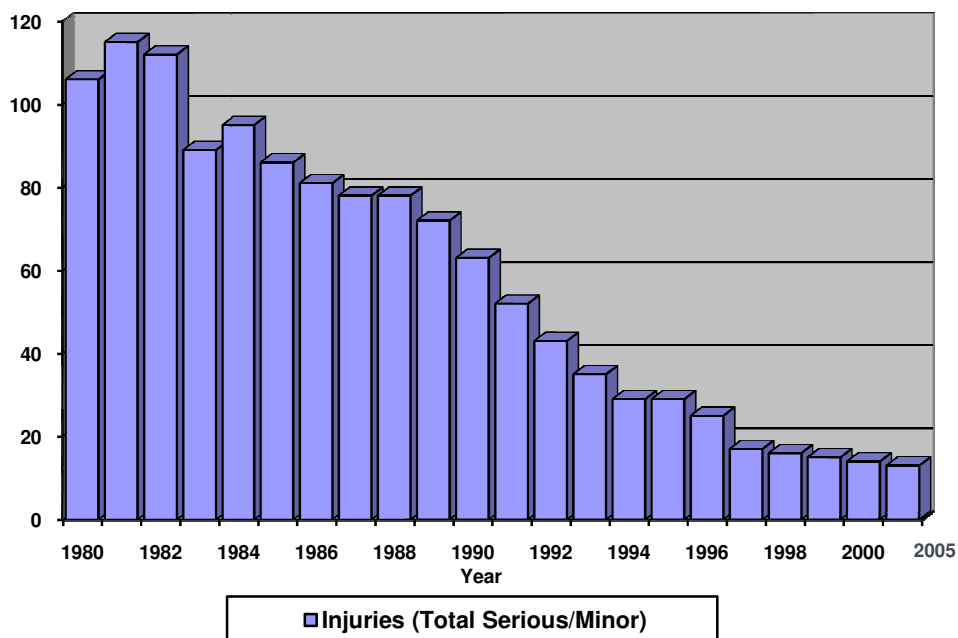
Interaction with State Legislation

The almost identical provisions of the Occupational Safety and Health Act 1984 and the Mines Safety and Inspection Act 1994 were deliberate.

Although at odds with the Robens philosophy of one Act, there was a realisation that the mining industry warranted specific regulation given its unsatisfactory safety performance prior to 1980, its generally remote location and the qualifications required to provide the necessary level of inspectorial expertise. In fact, the mining industry during the second half of the 1980's adopted the provisions of the Occupational Safety and Health Act with such success that its safety and health performance improved at a remarkable and sustained rate.

Western Australian Mines Incidence of Injury

Injuries per thousand employees



The key to the dramatic improvement was the holistic nature of the adoption by the mining sector of the Robens principles.

Industry sectors which have not followed the mining industry example have not achieved the same level of success.

One outstanding example was the commitment to the training of Safety and Health Representatives who have played a key role in improving safety and health in the workplace. **The point is crucial.**

Industry sectors which have not fully adopted these principles have not achieved the same level of success.

Since 1983 some 30%, on average, of all SHR's trained have come from the mining sector. The benefits are reflected in current workers' compensation premiums (and in workplace safety performance).

Training of Health and Safety Representatives and Workers' Compensation Premiums

Industry Sector	Average Premium 2007/08	Health and Safety Representatives Trained/1000 workers 2005/06
Electricity, gas, water	1.27	10.42
Mining	1.80	27.88
Transport & Storage	2.37	4.69
Manufacturing	3.36	3.23
Construction	3.68	5.15
Agriculture	5.04	2.33

Recommended Workers' Compensation Premium Rates 2007/2008

Mining	
Nickel Ore	1.55
Gold Mining UG	2.04
Metal Ore	1.31
Mineral Sands	1.17
Bauxite	1.28
Iron Ore	0.47

Other Industry Sectors	
Grape Growing	4.17
Bricklaying	8.51
Accommodation for Aged	4.29
Gardening Services	5.40
Sewerage and Drainage	3.05
Water Supply	0.72

There is no conflict between the two Acts and the reasons for maintaining separate legislation still remain valid. Within the State the original objection, Robens based, still persists, that is that there should be one Act applicable to all workplaces. Time has shown that this opposition was more political than in the best interest of occupational health and safety.

It is well to consider that had the Robens Committee been reporting on the industrial environment existing in Western Australia the Committee recommendations may well have been varied to accommodate the nature and needs of the mining industry.

It is also important to note that the only industry that has put into full effect the consultation and cooperation principles of Robens has been the mining sector.

The resultant improvement in occupational health and safety performance can be largely attributed to this commitment.

Conclusion

There is no conflict between the two occupational safety and health acts in Western Australia and the reasons for maintaining separate legislation remain valid. The mining industry is the standard-setter for safety and health achievement for its workforce.

INTERACTION WITH OTHER GENERAL OCCUPATIONAL SAFETY AND HEALTH REGULATION - NATIONAL

The differences between occupational safety and health legislation in the various Australian states generally reflect the political environment existing in those states when the respective legislation was drafted.

Subsequent amendments to those Acts follow a similar pattern.

Legislation in Western Australia has always been regarded as an excellent model with very few deviances from the Robens recommendations.

With the expected pressure to standardise legislation, a positive approach should be adopted provided there is no erosion of the provisions of the WA Act that have been demonstrably effective.

Provisions like that in NSW that allow revenue from fines to flow to unions is one example of an unacceptable provision. Powers of safety and health representatives that exceed that of those contained in the WA legislation is another example.

Legislation in WA has always been regarded as an excellent model with few deviances from the Robens recommendations.

Conclusions

Provided that the process of national harmonisation does not result in a weakening of occupational health and safety provisions currently applying in Western Australia this Association remains positive to the process.

Concessions granted, however, for political expedience that have the potential to jeopardise the standards of occupational health and safety existing in Western Australia at this time, must be vigorously opposed.

THE GOALS AND STRATEGIES OF THE NATIONAL MINE SAFETY FRAMEWORK AND THE DRAFT MODEL LEGISLATION

This initiative of the Conference of Chief Inspectors of Mines from the various states was first considered by the Ministerial Council on Mineral and Petroleum Resources in March 2002.

The National Mine Safety Framework Implementation Plan was discussed by the Conference of Chief Inspectors of Mines in 2003. Difficulties with implementing their summary of recommended actions were identified at that time and continue today. It is not the Association's intention to address these difficulties at this time.

Currently the Steering Group are requesting input on the three strategies it has developed:

- Overarching principles and key features document.
- A consultation protocol
- A national data set.

The Association supports the national strategies which will provide the basis for a national industry approach. These three strategies mirror the recommendations of the Robens Committee more than thirty years ago.

The Committee recommended a new Act which should contain a clear statement of the basic principles of safety responsibility supported by regulations, codes of practice etc and a simplified consultation procedure.

Commitment by all parties, however, within the respective state boundaries will need to be genuine if progress is to be made and a workable outcome achieved.

This is unlikely to be achieved in the short term in all states.

A further complication is the Council of Australian Governments' (COAG) agreement to progress national consistency in OHS regulation and the role of the Australian Safety and Compensation Councils which has been tasked with development and oversight of the National Framework.

In the current environment it is difficult to see the National Mine Safety Framework and/or draft model legislation progressing beyond the implementation of the three strategies for the foreseeable future. It may well be that consistency in implementing these strategies could be enough to provide an adequate national approach.

Conclusions

The current Western Australian legislation, which has been in place since 1994, has proven workable and durable. It follows closely the model recommended by the Robens Committee, that is, an Act containing a *clear statement of basic principles* and a *simple consultation process*.

A National Mine Safety Framework and Model Legislation need not go beyond the three strategies outlined. Consistency in the implementation of those strategies could be enough to provide an adequate national approach.

THE OUTSTANDING RECOMMENDATIONS FROM THE LAING REPORT MSIA PART 3

That Part 3 of the Mines Safety and Inspection Act be reviewed and, as necessary, amended to provide greater flexibility in the appointment of inspectors.

Having been involved (as a member of the WorkSafe Commission at the time of the Laing Review and also through lodgement of a detailed submission on behalf of MARCSTA) it is the writer's recollection that the issue of greater flexibility in the appointment of inspectors was one directly related to the requirement that inspectors hold a Degree in Mining Engineering (or its equivalent). It was not a concern raised by industry but rather an internal issue within the Mines Inspectorate where individuals resented the barrier to promotion.

The need to broaden the range of professional specialisations in the Inspectorate had previously been identified and recommended by industry in the comprehensive survey, "Future Role of the Mines Inspectorate"ⁱ carried out by the Chamber of Minerals and Energy in September 1996.

The survey recommended that professional specialisations available in the Inspectorate should include:

- Safety management and systems
- Mining, civil and electrical engineering
- Occupational health/hygiene
- Risk analysis and management; and

should provide a broad base of expertise available to provide advice and support rather than an "inspection" mentality.

A further recommendation was that a more flexible approach to the use of specialist personnel on a needs basis was needed.

This range and flexibility of personnel in the inspectorate exists today and it is our view that the matter should not require any further attention.

The remuneration offered to the mines inspectorate vis-a-vis that available in industry has been a stumbling block to maintaining the resources necessary for the inspectorate to carry out its regulatory functions.

In other states, notably Queensland, where mining has expanded considerably, the Government has acted to ensure adequate remuneration for retention of its inspectorate.

Previous “reports” have failed to adequately recognise the unreasonable stress this has placed on the dedicated DOCEP – Resources Safety personnel involved. The Government must accept responsibility for failing to address what have been urgent and apparent shortcomings in the provision of professional personnel for the last decade.

Conclusion

Flexibility in the appointment and utilisation of inspectorial personnel will not be possible until the real problems of remuneration and consequent retention are addressed.

THE OUTSTANDING RECOMMENDATIONS FROM THE LAING REPORT MSIA PART 4

That a review be undertaken of the requirements of Part 4 of the Mines Safety and Inspection Act 1994, in particular, of certification requirements; and

The effectiveness of the operation of the Mines Survey Board.

Board of Examiners

The role of the Board of Examiners was reviewed by an industry-departmental committee at the time the current Act was written, that is, when the former Mines Regulation Act was reviewed and re-written. At that time the industry was adamant that the retention of Boards containing industry representatives was essential to the maintenance of industry standards.

If changes in industry over the past 15 years have brought about a change in its needs and expectations then the industry should be surveyed and directly involved in determining what those changes should be. This consultation should include contractors who do much of the operational work.

The future of mining in Western Australia may well include an expansion of the underground sector with an increased need for professionally trained mining engineers, geo-technicians etc. Any proposals to alter the status quo must take account of this likelihood.

Certificates of Competency

The continuation of the current requirements to obtain Certificates of Competency is also a matter requiring the direct involvement of the breadth of industry at the operational level.

Operational personnel involved on a day-to-day basis with mining practice should be surveyed on a confidential basis for an opinion on the merits, or otherwise, of the long standing competency requirements which have proved to be effective. This survey should also include the continuation of the Board of Examiners and Mines Survey Board.

The results of such a survey, preferably conducted independently, would provide a comprehensive response to these issues from those who work with them on a day-to-day basis.

Conduct of Examinations

The conduct of examinations and grading of papers may be better carried out by an independent body e.g. the WA School of Mines.

This would relieve departmental personnel from a time-consuming activity.

Harmonisation with Legislation Requirements in Other States and Territories

The relative benefits of harmonizing legislation requirements for the educational qualifications and practical experience required to attain the necessary Certificates of Competency is a matter of considerable importance to the industry today – and to the workers employed in it.

No decision on harmonization should be taken until the survey proposed of operational personnel has been completed and analysed.

When the collective views of certificated personnel are known the industry in Western Australia will be in a position to become involved in the question of harmonization of legislative requirements.

Conclusions

The issues of:

- Boards of Examiners;
- Certificates of Competency – educational qualifications;
- Conduct of Examinations; and
- Need for qualifications/practical experience

should all be fully canvassed with operational personnel responsible for the safety and health of the workforce which is the primary object of the Mines Safety and Inspection Act:

“...to promote, and secure, the safety and health of persons engaged in mining operations.”

Decisions taken in the interests of harmonisation should not lose sight of the primary object of the legislation.

THE RECENT HICKS FEASIBILITY STUDY OF RESOURCES SAFETY IN WESTERN AUSTRALIA THAT RECOMMENDED THE INTRODUCTION OF A SAFETY CASE REGIME INTO THE MINING INDUSTRY

The Association has not been privy to the Hicks Feasibility Study and is therefore not able to comment on that specific document.

However, as the study is expected to support the introduction of a safety case regime for the entire mining industry the Association would like to express its concern with that concept.

Safety cases emanated from the nuclear industry and were extended later to other industries such as offshore oil platforms, onshore installations and other major hazard facilities. They were aimed at catastrophic risk and considered a suitable approach to plants or facilities of sufficient complexity and hazard potential to warrant their development.

The usual criteria included:

- Major asset damage/loss of productivity e.g. Longford
- Danger to the public/significant loss of life e.g. Piper Alpha
- Environmental pollution on a large scale e.g. Chernobyl

When such situations are identified in the mining industry it would be appropriate to require the development of a safety case for that operation/facility and there may well be a need to make some provision in the Mines Safety and Inspection Act to give the required level of regulatory capacity for that purpose. This would enable the preparation of appropriate design and process reviews and checks by third parties with the cost to be met by the proponent prior to construction and commissioning.

Alternately, a separate piece of legislation could be developed to allow proponents of any major industrial facility to elect a safety case option to apply to that facility or operation.

Origin of the Proposal to Introduce a Safety Case Regime

The origin of the proposal to introduce a safety case for the mining industry appears to have been the Ritter Report ⁱⁱ with the recommendation that any re-commissioning of the Boodarie Iron Plant require submission of a safety case.

This recommendation subsequently became an industry wide proposal when considered by the Mine Safety Improvement Group. Whatever the motivation of members of this group little attention was paid to the full consequences of their decision.

No credible justification for dispensing with the existing regulatory structure has ever been put forward.

The current safety and health performance of the mining industry, by any measure, provides no basis for such a recommendation.

The Introduction of a Safety Case Regime for the Mining Industry

The mining industry is characterised by reliance on people intensive “manual type activities “ (by necessity) with mine employees working in a constantly changing environment which requires them to deal with hazards on a day-to-day basis with continual reassessment of risks and hazards as circumstances change.

In addressing the potential implications of the Commonwealth Review of the Offshore Petroleum Safety Case Regime for the Mines Safety and Inspection Act in April 2000, the State Mining Engineer (J M Torlach, deceased) concluded that:

“the risk of injury or harm to health of employees from every day events on an individual basis tends to be lost sight of in this highly structured process approach to safety.” ⁱⁱⁱ

Requiring the development of a safety case for the mining sector as a whole would be inappropriate for small open pit operations, quarries, non-complex treatment plants etc which employ small numbers of personnel.

By all means relatively static and complex facilities which meet the criteria should be able to elect the option of developing a full safety case.

Pitfalls of the Safety Case Regime

The pitfalls identified by Rasche^{iv} in 2001 are still applicable today:

- The amount of work required in constructing a safety case
- The specialised and costly resources required
- The difficulty of describing and modelling major accident events realistically
- Problems with data availability and validity
- The requirement to consult with and allow participation of employees in the preparation of the safety case, and
- The reliability of methods used to predict operator performance.

The Robens Committee identified that the primary responsibility for improving safety and health performance rested with those who create the risks and those who work with them. Consequently, the lack of ownership by managers, supervisors and employees on site every day is a real concern with the implementation of a safety case.

As Rasche warned:

“the mining industry must be vigilant not to create an inflexible paper system but rather one tailored to the physical and individual needs of the mining operation.”

National Harmonisation

At a time when there is an increased drive for national harmonisation, introducing a safety case regime that was not supported by other jurisdictions would seem injudicious.

(Queensland is one state which considered that option but did not proceed with it.)

(The Mine Health and Safety Regulation 2007 makes no provision for that option.)

Conclusions

When situations which meet the usual criteria are identified in the mining industry it would be appropriate to require the development of a safety case for that operation/facility and there may well be a need to make some provision in the Mines Safety and Inspection Act to give the required level of regulatory capacity for that purpose. This would enable the preparation of appropriate design and process reviews and checks by third parties with the cost to be met by the proponent prior to construction and commissioning.

Alternately, a separate piece of legislation could be developed to allow proponents of any major industrial facility to elect a safety case option to apply to that facility or operation.

No credible justification for dispensing with the existing regulatory structure has ever been put forward.

APPENDIX

Members of the Mining and Resource Contractors Safety Training Association (MARCSTA)

The Association is comprised of member companies contracting or providing services to the mining and resource industries.

With input from its members, the Association has developed a number of nationally accredited safety and health training programs to meet the needs of the training and resource industries and fulfill the training obligations of both employers and employees as prescribed in the Mines Safety and Inspection and Occupational Safety and Health Acts.

MARCSTA is a non profit organisation, therefore all proceeds are reinvested in training programs.

Ausdrill Ltd
Barminco Limited
BGC Contracting Pty Ltd
Cooks Construction Pty Ltd
GR Engineering Services
GRD Minproc
Kellogg Brown & Root Pty Ltd
Komatsu Australia Pty Ltd
Macmahon Contractors Pty Ltd
Rinker Australia Pty Ltd
Downer EDI Pty Ltd
Skilled Group Ltd
Terex Materials Processing and Mining Australia
Thiess Pty Ltd
Total Corrosion Control
Westrac Equipment Pty Ltd
Aveling
Jako Industries Pty Ltd
Mandurah Safety and Training Services Pty Ltd
Mine SafeGear
Safety First Risk Management
Strudwick HR

REFERENCES

- ⁱ Future Role of the Mines Inspectorate, Chamber of Minerals and Energy WA, September 2006
- ⁱⁱ Ministerial Inquiry into occupational health and safety systems and practices of BHP Billiton Iron Ore and Boodarie Iron sites in Western Australia (Ritter Report 2004)
- ⁱⁱⁱ Commonwealth Review of the Offshore Petroleum Safety Case Regime, Implications for the MSI Act and MOD, Torlach, J.M. State Mining Engineer, 4 April 2000
- ^{iv} Development of a Safety Case Methodology for the Minerals Industry – a Discussion Paper. The University of Queensland – Minerals Industry Safety and Health Centre, Rasche, Tilman, October 2001.