GOVERNMENT OF WESTERN AUSTRALIA

Department of **Local Government, Industry Regulation and Safety**

WorkSafe Western Australia Mines Safety

SELF-ASSESSMENT

Principal mining hazard management plans

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Reference

WorkSafe Western Australia, 2025, Principal mining hazard management plans: Self-assessment. Department of Local Government, Industry Regulation and Safety, Western Australia, 23 pp.

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Introduction

Purpose of this self-assessment

This self-assessment has been developed to assist mine operators to determine whether their principal mining hazard management plans (PMHMPs) are compliant with the *Work Health and Safety Act 2020* (WHS Act) and Work Health and Safety (Mines) Regulations 2022 (WHS Mines Regulations). For further information, see the *Principal mining hazard management plans: Guide* and the *Mine safety management system: Code of practice*.

Legal duties

The WHS Act requires a person conducting a business or undertaking (PCBU), including the mine operator, to ensure, so far as is reasonably practicable, that the health and safety of workers and other persons is not put at risk from any work carried out as part of the business or undertaking. This means eliminating or minimising risks to health and safety, so far as is reasonably practicable. This includes:

- provision and maintenance of healthy and safe work environments
- provision and maintenance of safe plant and structures
- provision and maintenance of safe systems of work
- safe use, handling and storage of plant, structures, and substances
- methods for the identification of, and managing the impact from, psychosocial hazards
- provision of adequate facilities for the welfare of workers at work
- provision of information, instruction, training, and supervision necessary to protect all workers from risks to their health and safety
- monitoring, including proactive control, of workplace conditions and the effects on workers' health.

A mine operator also has duties under the WHS Mines Regulations that include establishing and implementing a PMHMP for each principal mining hazard (PMH). These plans are part of the mine safety management system (MSMS), which is the mine operator's primary means of ensuring the health and safety of workers and other persons at the mine by preventing fatalities, serious injuries and debilitating industrial illnesses. A mining operation is defined by regulation 5B and includes, but is not limited to, refineries for processing of minerals and rocks, an underground or opencut mine, exploration, a quarry and rehabilitation activities at a mine site.

The mine operator is required to understand their duties under the above legislation.

Using the self-assessment

Mine operators are encouraged to begin their evaluation process with the MSMS self-assessment before using this self-assessment, tools for other operational risks with serious injury or harm potential, and finally, tools designed for administrative compliance such as health and safety representation.

This self-assessment is used to evaluate the adequacy of the PMH management program against minimum compliance requirements. It can be used to identify strengths and opportunities for improvement. It is not definitive, and mine operators should customise

the assessment to their workplace by including additional areas or sections as required to ensure that operational health and safety risks are addressed.

This self-assessment can be completed as a whole, or sections of the assessment may be completed as separate components. As with the management of any health and safety process, expert advice should be sought when the limits of internal expertise have been reached.

Who should complete the self-assessment

It is necessary that those undertaking the self-assessment have access to information about the MSMS and PMHMPs, work environment and work processes, and knowledge and understanding of the mine operations. As this self-assessment requires access to information from different business areas, it is recommended that they receive input from operational groups and subject matter experts (work health and safety advisors, health and safety representatives, workers, statutory supervisors, and senior management).

A project sponsor who has decision-making authority at senior level may be needed to ensure visible support and assistance including the necessary resources to complete the self-assessment and to address any findings.

At the end of this self-assessment, there is a corrective action plan template. The mine operation's management should ensure that deficiencies are captured, actioned, tracked to closeout, and verified to be effective in managing health and safety risks.

The self-assessment process

There are three steps in completing the self-assessment:

1. collecting evidence of compliance
2. rating the level of compliance
3. formulating a corrective action plan.

Collecting evidence of compliance

Collecting evidence for this self-assessment is similar to collecting evidence for other assessments that focus on process safety, and work health and safety. Different types of evidence may be required to demonstrate compliance or implementation. There are three ways to collect evidence for this self-assessment:

- **interviewing people** including managers, supervisors, workers, contractors and health and safety representatives
- **reviewing documents** including operating manuals, policies, plans and procedures; records (e.g. work instructions, completed forms and permits, reports, registers); and reports or other data (e.g. risk assessments, surveys and functional task analysis)
- **observing work tasks** being performed and conditions within the workplace (take photographs, where possible, to use as records).

If possible, evidence should be from all three categories to verify findings.

Collecting evidence to complete the self-assessment will generally require an examination of the following areas:

- **Methods or systems of work:** how work is designed and managed for known and foreseeable health and safety critical tasks and major accident events, risk assessment processes, and maintenance of the MSMS.
- **Environment where the work is conducted:** above ground; underground; activities that are part of the mining operation but outside main operational areas such as mobilisations to and from site, and the changing conditions of that environment such as weather events.
- **Plant, equipment, tools and technologies being used by the workforce:** machinery, control panels, personal protective equipment.
- **Human resourcing:** worker competencies, supervision, coverage, statutory positions, internal subject matter expertise.

Rating the level of compliance

Rating	Description
Compliant (C)	There is sufficient and appropriate evidence to demonstrate the requirement has been complied with and is within the scope of the self-assessment
Non-compliant (NC)	Clear evidence has been collected to demonstrate the compliance standard has not been complied with but is within the scope of the self-assessment
Not determined (ND)	The necessary evidence has not been collected to enable an assessment of a compliance standard to be made within the scope of the self-assessment. There may be various reasons why the self-assessment team could not collect the required information, including: • insufficient information to enable an assessment of compliance to be made • the wording of the criteria meant that no evidence could be gathered, or it was too difficult to gather the evidence.
Not applicable (NA)	An element in the compliance standard was not assessed within the scope of the self-assessment given that it was not applicable because the criteria for a particular compliance standard is not present at the mine (e.g. requirement for an underground ventilation plan is only applicable to underground mining)

The intent of the compliance standards and greater detail for the collection of evidence is provided in each section of the self-assessment table below. This also includes the main legislative references.

Formulating a corrective action plan

After completing the self-assessment table, a corrective action plan should be formulated and endorsed by senior leadership. An example corrective action plan template is provided at the end of this self-assessment.

The mine operator should ensure that deficiencies are captured, actioned and tracked to closeout, and that controls are verified as effective in managing health and safety risks. Points rated 'Not determined' should also be included in the corrective action plan to ensure that all applicable parts of the assessment are completed, and all deficiencies are identified.

PMHMP self-assessment

Compliance standard	Compliance rating	Compliance score		Evidence sighted/ comments
1 MSMS				
1.1 The mine operator has undertaken the self-assessment for the MSMS.	Verify that the mine operator has completed the MSMS self-assessment or another self-assessment customised for this purpose. See r. 623, r. 624 and r. 625.	C NC ND NA	☐ ☐ ☐ ☐	
1.2 Control measures have been implemented, or planned, where deficiencies have been identified by the MSMS self-assessment.	Verify that the mine operator has captured any findings from the MSMS self-assessment and implemented, or planned for improvements to, control measures where these actions are required to meet compliance requirements. See r. 38, r. 618 and r. 625.	C NC ND NA	☐ ☐ ☐ ☐	
1.3 The MSMS addresses PMH risk processes; critical control processes for all PMHs; and an audit schedule.	Verify that the MSMS addresses: • PMH risk identification, assessment and control processes • critical control verification processes for all PMH • an audit schedule to verify that the PMH critical control program and each control are effective See r. 618, r. 619, r. 622, r. 623, r. 624, r. 625, r. 627, r. 628, r. 629 and Schedule 19. *Good practice involves obtaining guidance from industry best practice such as the International Council on Mining and Metals (ICMM). Specific references include:* • *Critical control management: Implementation guide* • *Health and safety critical control management: Good practice guide* *Good practice involves determining critical controls using recognised risk assessment methods such as bowtie analysis, fault tree analysis and critical control decision tree. The risk workshop for each PMH should be attended by key managers and supervisors responsible for critical control implementation and be facilitated by a person who is competent in the selected risk assessment method.*	C NC ND NA	☐ ☐ ☐ ☐	

Compliance standard	Compliance rating	Compliance score		Evidence sighted/ comments
2 Principal Mining Hazard Identification				
2.1 The principal mining hazards have been identified.	Verify that all PMHs have been identified for the mining operation. See r. 627 and Schedule 19.	C NC ND NA	☐ ☐ ☐ ☐	
3 Principal Mining Hazard Risk Assessment				
3.1 The risk assessment is comprehensive.	Verify that each PMH has been assessed through a comprehensive and systematic investigation and analysis of all aspects of the risks identified. See r. 627(2) and r. 627(3).	C NC ND NA	☐ ☐ ☐ ☐	
3.2 Other hazards and recurring events are considered in the evaluation and analysis of the PMH.	Verify that each PMH has been considered individually and cumulatively with other hazards at the mine, and that risks from a single event or a series of recuring events have also been considered. See r. 612(1) and r. 627(3).	C NC ND NA	☐ ☐ ☐ ☐	
3.3 In the risk assessment, the PMHs referred to in the regulations have been considered.	Verify that PMHs referred to in r. 612 and Schedule 19 of the regulations have been considered and addressed, where applicable.	C NC ND NA	☐ ☐ ☐ ☐	
3.4 Each risk assessment is conducted by a competent person with appropriate knowledge of the hazard.	Verify that workers involved in the PMH risk assessment process are trained and competent to conduct the types of risk assessments through field verification. See r. 617(2).	C NC ND NA	☐ ☐ ☐ ☐	
3.5 The PMH risk assessment identifies controls utilising the hierarchy of control.	Verify the controls documented in the risk assessment eliminate or minimise the risks to health and safety through the hierarchy of control and the residual risk is as low as reasonably practicable. See r. 36 and r. 628.	C NC ND NA	☐ ☐ ☐ ☐	

Compliance standard	Compliance rating	Compliance score		Evidence sighted/ comments
3.6 The PMH risk assessment established controls are specific and measurable with established performance criteria to demonstrate controls are in place and effective.	Verify that a range of performance indicators are required for all control measures, particularly for those deemed critical. The performance indicators measure both how well the controls are performing and how effectively the management system is monitoring and maintaining them.	C NC ND NA	☐ ☐ ☐ ☐	
4 Principal Mining Hazard Management Plans				
4.1 For each PMH referred to in the regulations, the PMHMP addresses the requirements listed.	Verify that any PMHMP developed and implemented by the mine operator for a PMH referred to in Schedule 19 of the regulations addresses each of the requirements listed under the applicable PMH in that schedule. See r. 612 and r. 628, and Schedule 19.	C NC ND NA	☐ ☐ ☐ ☐	
4.2 If there are other PMHs that have been identified by the mine operator, that these have been risk assessed, a PMHMP developed and implemented, and controls put in place to achieve elimination or risk reduction to as low as reasonably practicable.	In the case of any PMHMP developed for those PMHs which are not referred to in Schedule 19 of the regulations, verify that risks have been assessed, plans implemented, and controls have achieved risk elimination or reduction to as low as reasonably practicable. See r. 36, r. 612 and r. 628.	C NC ND NA	☐ ☐ ☐ ☐	
4.3 Each PMHMP is written in a way that is readily understandable, so far as is reasonably practicable.	Verify that each PMHMP is expressed in a way that is readily understandable by persons who use it, so far as is reasonably practicable. See r. 628 (2).	C NC ND NA	☐ ☐ ☐ ☐	

Compliance standard	Compliance rating	Compliance score		Evidence sighted/ comments
4.4 Each PMHMP meets the requirements listed in r. 628(3) of the regulations.	Verify that each PMHMP contains the following information: – a description of the PMH to which the plan relates – how the PMH relates to other hazards at the mine – how the PMH was identified – the risk assessment conducted for the PMH – the process for determining controls to be implemented – all the controls to be implemented – provision of risk control management including control verification and maintenance activities to ensure controls remain effective – all design principles, engineering standards and technical standards relied on for control measures for the PMH – reasons for adopting or rejecting control measures considered – the information, instruction and training to be provided for the PMH See r. 628(3).	C NC ND NA	☐ ☐ ☐ ☐	
4.5 Any changes made to PMHMP are retained as records.	Verify that records are retained of any changes to any PMHMP, for instance, through document control. See r. 619(2).	C NC ND NA	☐ ☐ ☐ ☐	
5 PMHMP performance standards and audit				
5.1 Auditing of each PMHMP forms part of the MSMS audit program.	Verify that, as PMHMPs are part of the MSMS, there are performance standards for the effectiveness of the plans, and this is included in a system for auditing. See r. 622(1)(d)(i) and r. 623.	C NC ND NA	☐ ☐ ☐ ☐	
5.2 The PMHMP sets out guidance on the actions to be taken when a change may affect the effectiveness of a critical control of a PMH.	Verify that a process is established to review and or revise the PMHMP and the supporting risk assessment if a control measure is revised following a notifiable or reportable incident or if the control measure does not adequately control the risk it was implemented to control. See r. 38, r. 618, r. 623 and r. 629.	C NC ND NA	☐ ☐ ☐ ☐	

Compliance standard	Compliance rating	Compliance score		Evidence sighted/ comments
5.3 Control effectiveness assessments and control maintenance tasks are established and completed to ensure controls remain effective.	Verify that a process is established for identifying and reporting abnormal conditions or changes that may affect critical control effectiveness. For instance, a trigger action response plan may be required. This summarises the overall monitoring arrangements and includes planned actions ready to implement when certain trigger points are detected. See r. 38 and r. 618 and MSMS Code of practice part 2.5.1.	C NC ND NA	☐ ☐ ☐ ☐	

Appendix 1 Corrective action plan

Timeframe	Task	Responsible person	Completion date	Review date
Immediate				
Short-term				
Medium-term				
Long-term				

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