

May 2025

Response to stakeholder feedback

TRG Monitoring and control of worker exposure to airborne dust

The Resources Regulator circulated the Technical reference guide (TRG) Monitoring and control of worker exposure to airborne dust for targeted consultation in October 2024. This document summarises the key issues raised by stakeholders as part of the consultation and details the Regulator's response to these issues.

The stakeholder feedback has been categorised into themes and the Regulator's responses are set out below.

1. Change the TRG's title from airborne contaminants to airborne dust

Several stakeholders indicated the original title of the TRG was confusing as it referred to airborne contaminants. Stakeholders proposed the title of the TRG should be airborne dust as this is the TRGs focus. Stakeholders also sought clarification on the relationship between the TRG and the requirements for a silica control plan in the Work Health and Safety Regulation 2017.

Resources Regulator's response

The Regulator agreed and has changed the title of the TRG to Monitoring and control of worker exposure to airborne dust (inclusive of inhalable dust, respirable dust and respirable crystalline silica). The Regulator has also included a reference to its position paper on preventing worker exposure to respirable crystalline silica in section 1.3 of the final version of the TRG.

2. Clarify how a person is deemed competent to undertake different activities in developing and implementing airborne dust monitoring programs

Several stakeholders requested clarification on the skills, qualifications and experience required of a competent person to design personal exposure air monitoring programs and carry out exposure monitoring and analysis.

Resources Regulator's response

The Regulator has included further information about the skills, qualifications and experience of a competent occupational hygienist and a competent occupational hygiene technician in section 2.2 of the final version of the TRG. The Regulator has also clarified when a licenced provider must be used for statutory monitoring under the Work Health and Safety (Mines and Petroleum Sites) Regulation 2022.

3. Clarify use of personal monitoring sampling equipment

A stakeholder proposed the Regulator clarify what equipment a person carrying out personal exposure monitoring needs to use in section 2.3.

Resources Regulators response

The Regulator has clarified in section 2.3 of the final version of the TRG what the mine operator needs to ensure regarding sampling equipment and the sampling methodology used.

4. Clarify the usefulness of control monitoring

A stakeholder questioned the usefulness of control monitoring in section 2.4.3 and whether it should be an option provided in the TRG.

Resources Regulators response

The Regulator believes control monitoring is useful in verifying that control measures are working to design specification to reduce dust generation from identified dust generating processes. The Regulator has clarified the usefulness of control monitoring for investigating and validating control effectiveness and ongoing control measure performance. The Regulator amended the relevant heading at section 2.4.3 to say “control verification monitoring”.

5. Include examples of other reputable personal exposure monitoring strategies in the TRG and enable the TRG to accommodate these strategies

Several stakeholders suggested including examples of other reputable personal exposure monitoring strategies, as the National Institute of Occupational Safety and Health’s Occupational Exposure Sampling Strategy (1977) cited in the TRG is dated and has limitations in certain situations.

Resources Regulator’s response

The Regulator acknowledges there are other reputable personal exposure monitoring strategies that are available for occupational hygienists to use to determine an estimate of workplace exposures. The Regulator has amended the TRG and recommended five reputable sampling strategies in section 2.5. The Regulator also amended other parts of section 2.5 such as baseline monitoring and periodic monitoring that support different sampling strategies that a competent occupational hygienist may use and how reviews of the sampling strategies may take place.

6. Clarification of interpreting and reporting exposure monitoring results

A stakeholder requested clarification on interpreting worker exposure monitoring results for compliance and reporting purposes.

Resources Regulator’s response

The Regulator has amended sections 2.6 and 2.7 to clarify when a single worker exposure monitoring result is reportable to the Regulator. The Regulator has also included guidance in the final version of the TRG on how to interpret similar exposure group (SEG) exposure monitoring results using a number of statistical analysis packages.

7. Clarification that control measures outlined in section 3 of the TRG are suggestions and not prescribed

A stakeholder expressed concern that control measures outlined in section 3 of the TRG appear to be mandatory.

Resources Regulator's response

The Regulator develops TRGs as guidance on how to prepare and implement relevant safety management strategies required under the Work Health and Safety (Mines and Petroleum Sites) laws, and based on leading industry practice. Compliance with a TRG is not mandatory. Where actions are mandatory under legislation the TRG uses the term “must”. The TRG uses the terms “should” or “may” when the actions are recommended.

8. Clarify actions in Trigger Action Response Plans (TARPs)

Stakeholders requested clarification on use of TARPs when control measures are not functioning to design specification.

Resources Regulator's response

The Regulator has amended section 3.1.3 to clarify the use of short term actions in a TARP when controls are identified as being deficient. The Regulator has also included in the final version of the TRG guidance on the use of real time monitoring as a short-term alternative action response if key controls are deficient.

9. Specific roles and accountabilities for managing dust on surface roads

A stakeholder suggested that the TRG should include specific roles and accountabilities for managing dust on surface roads.

Resources Regulator's response

The Regulator disagrees with this suggestion as it is the responsibility of the mine operator to develop specific roles and responsibilities suitable for specific mining operations. The Regulator has included additional content in section 3.2.6 recommending that mine operators should continually monitor dust on surface roads.

10. Include the use of M class filters as acceptable

Several stakeholders requested the TRG include M class filters as acceptable filters for local exhaust ventilation systems and industrial vacuum systems when there is a moderate risk.

Resources Regulator's response

The Regulator agreed to include M class filters in the final version of the TRG as an option when the risk is assessed as moderate. H class filters are preferred when the risk is assessed as high.

11. Use of alternate dust filters so used filters can be bagged for cleaning

A Stakeholder suggested the TRG should recommend using alternate dust filters and the bagging of used filters for cleaning in a controlled environment.

Resources Regulator's response

The Regulator accepted this suggestion and has amended section 3.2.7.3 of the TRG to reflect this.

12. Include examples of control verification checks for filtration systems in fixed and mobile plant cabins

A stakeholder suggested including examples of control verification checks for fixed and mobile plant cabin ventilation systems.

Resources Regulator's response

The Regulator agreed and has included examples of control verification checks in section 3.2.9.1 of the final version of the TRG.

13. dust controls during drilling and blasting activities are coal centric

A stakeholder suggested that recommendations for dust control during drilling and blasting is not useful for non-coal mines.

Resources Regulator's response

The Regulator disagrees with this suggestion as the information is general in nature and applicable to all sectors of the mining industry.

14. Remove section on welding from the TRG

Several stakeholders recommended removing the welding section as the TRG is focusing on airborne dust.

Resources Regulator's response

The Regulator agreed and has removed the section on welding. The Regulator notes there is a SafeWork NSW welding code of practice that is applicable to the mining industry.

15 Include references to more sources of information in Appendix C of the TRG

A stakeholder suggested including extra references to useful information in Appendix C

Resources Regulator's response

The Regulator has included references to further information where appropriate in Appendix C of the final version of the TRG.

16. General editorial issues

Several stakeholders identified several improvements on editorial flow, grammar and spelling throughout the TRG. Stakeholders also suggested including more non-coal examples when appropriate.

Resources Regulator's response

The Regulator agreed to the suggestions where they improved the readability and flow of the TRG or corrected an error. This included reviewing coal-centric language and where appropriate including non-coal examples. These are reflected in the final version of the TRG.

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