

July 2025

## Response to stakeholder feedback

### TRG Roads and other vehicle operating areas principal hazard management plan for surface mining operations

The Resources Regulator (Regulator) carried out public consultation on the technical reference guide (TRG) roads and other vehicle operating areas principal hazard management plan for surface mining operations during May 2025. The Regulator received 6 written submissions from interested parties. This document summarises the key issues raised in those submissions and details the Regulator's responses.

#### 1. Clarify the scope and application of the TRG

Several stakeholders sought clarification as to whether it applies to surface parts of underground mines. Stakeholders also sought clarification regarding the scope regarding remote control vehicles and detailed engineering requirements for road design and construction.

##### Resources Regulator's response

The Regulator in section 1 of the TRG clarified that it applies to surface parts of underground mines and that remote controlled vehicles are included in the scope of the TRG, however only in a limited manner. The Regulator believes the intention of TRG is focused on reducing the risks of adverse vehicle interactions through the layered defence approach and the 4 steps of implementation and not detailed design requirements, although layers 1 and 2 do discuss them.

#### 2. Clarify the usefulness of the TRG for small and medium size mines

A stakeholder suggested the TRG was not suitable for small to medium size quarries.

##### Resources Regulator's response

The Regulator notes the TRG is not focused on tier 3 quarries. The Regulator believes the TRG is suitable for medium size quarries as the implementation of 4 steps in the TRG and the sophistication of a principal hazard management plan is commensurate to the risk profile of the mining operation.

#### 3. Making Table 1 on matter to consider an appendix in the TRG

A stakeholder suggested that Table 1, which outlines examples of matters to consider, is better located as an appendix rather than in the body of the TRG.

##### Resources Regulator's response

The Regulator agrees and has moved Table 1 to be Appendix A in the TRG.

## 4. Justifying methods used during the risk assessment process

Several stakeholders suggested that mine operators did not need to justify risk assessment methods already recognised as good industry practice.

### Resources Regulator's response

The Regulator clarified there is no need to justify risk assessment methods that are already known to be good industry practice.

## 5. Clarification regarding use of step 1 and worked examples of the maturity model

A number stakeholders sought clarification of the use of the maturity model with some worked examples. A stakeholder also suggested moving paragraph 3 regarding adaptive solutions to step 2.

### Resources Regulator's response

The Regulator clarified that the maturity model is a self-reflective tool for mining operations and not a compliance tool. The Regulator agreed to move paragraph 3 to step 2 as it is better placed there. The Regulator did not agree that worked examples would be of use as every mining operation is different.

## 6. Clarification of several matters in layer 3 of the layered defence model

A stakeholder suggested clarifying what changes in road surfaces means and to include a point on passing procedures.

### Resources Regulator's response

The Regulator agreed to a clarification and included a point on passing procedures in layer 3.

## 7. Clarify if a stand-alone training program is required in layer 4 modify the point on criteria for selecting vehicle operators

Stakeholders sought clarity on training programs and selection criteria process of vehicle operators.

### Resources Regulator's response

The Regulator believes training should be integrated with the mine sites' overall training program, and that vehicle operator selection should not include physical assessment on capability to operate the vehicle. The TRG has been amended to reflect this.

## 9. In layer 6 refer to handheld mobile transmitting devices not mobile phones

A stakeholder suggested changing to handheld mobile transmitters and not phones.

### Resources Regulator's response

The Regulator agreed and amended the TRG.

## 10. Move purposes and scope for transport management plan to top of section 2.4.1 and special consultation arrangement not required

A stakeholder suggested moving the purpose and scope of a transport management plan from the middle to the top of section 2.4.1. A stakeholder proposed that separate consultation arrangements are not necessary as it duplicates existing arrangements.

### Resources Regulator's response

The Regulator agreed to amend the TRG by moving the purpose and scope. The Regulator believes that on large complex sites a specific committee for transport management may be warranted and it's up to the mine operator to decide.

## 11. In section 2.4.2 include further guidance on verification of control measures

A stakeholder suggested further guidance on verification of control measures with examples would be useful.

### Resources Regulator's response

The Regulator agreed and included a new subsection on verification of control measures at 2.4.2.1 in the TRG.

## 12. In section 3 Training, the second paragraph changes to refer to information, training and instruction and the last point on authorisation is not training

A stakeholder suggested amending the second paragraph in section 3 to better reflect the regulatory requirement of information, instruction and training. Another stakeholder proposed that authorisations in the last point are not training and should be removed.

### Resources Regulator's response

The Regulator agreed to both suggestions and amended the TRG to reflect them.

## 13. No underground mine examples in appendix on safety alerts and investigation reports

A stakeholder suggested removing the underground examples from this appendix (now Appendix C).

### Resources Regulator's response

The Regulator disagrees as the examples have information that is also relevant to surface mining operations.

## 14. General editorial issues

Several stakeholders identified several improvements on editorial flow, grammar and spelling throughout the TRG. Stakeholders also suggested including more descriptions of acronyms and concepts. A stakeholder suggested renaming traffic management plan to transport management plan.

## 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 more descriptions of acronyms and concepts including renaming the transport management plan and changing employees to workers. These are reflected in the final version of the TRG.

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