

# Order 34 2025 Industry Update



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December 2025

# Today's session



Time	Agenda item
1:00pm – 1:05pm	Welcome + Introduce Erin Lee, GM Mines Rescue/Regulation & Compliance
1:05pm – 1:20pm	2025 Order 34 summary
1:20pm – 1:25pm	Plan for 2026
1:25pm – 1:28pm	General discussion
1:28pm – 2:00pm	Thank you and close out

2025

## Order 34 summary

# 2025 Order 34 Summary



## **12** TCMS Approvals

**Including 2 amendments covering:**

- 8 underground operations
- 3 open cut operations
- 3 standalone CHPPs



## **25** Audits Completed

**Covering:**

- 9 underground operations
- 14 open cut operations
- 5 standalone CHPPs

*Online check-ins conducted with all remaining operations.*

# 2025 Order 34 audit objectives and scope



## **Objective:**

*To determine if Coal Handling Preparation Plants had a comprehensive and effective Training Needs Analysis in place.*

## **Scope:**

1. Ensure that fundamental TCMS elements are correct  
*(controlled copy/version control, audit processes, review and revision)*
2. Ensure that action items from previous audit outcomes were addressed  
*(audit improvement opportunities/NCR - responsibility, timing, tracking)*
3. Confirm that a comprehensive and effective Training Needs Analysis was in place.  
This included review of the following areas of the Order 34 Guideline:
  - a) Resources
  - b) Responsibility and Accountability
  - c) Competency Standards
  - d) Training Needs Analysis
  - e) Induction Training & Assessment
  - f) Emergency Response Training & Assessment
  - g) WHS Representative Training
  - h) Supervisor and Manager Training & Assessment
  - i) Training Required by Legislation

# 2025 Order 34 Audits



# 2025 Order 34 Audits

## Audit scope items 1 & 2:

- 1. Ensure that fundamental TCMS elements are correct (controlled copy/version control, audit processes, review and revision)*
- 2. Ensure that action items from previous audit outcomes were addressed (audit improvement opportunities/NCR - responsibility, timing, tracking)*

**0** Commendable practices

**26** Improvement opportunities  
*17 IOs from previous Audits had not been considered/implemented or required further follow-up*

**0** Non-conformances

**Order 34**  
Guideline 2024

D1 Documents

E2 Audit

# Audit scope item 1 & 2: improvement opportunities

Improvement opportunities for these sections related to:	No. of IOs
Follow on from previous Order 34 audit improvement opportunities	17
Review of the TCMS	4
Internal auditing of the TCMS	4
External auditing of the TCMS	1



# 2025 Order 34 Audits

Audit scope item 3:

*3. Confirm that a comprehensive and effective Training Needs Analysis was in place.*

*This included review of the following areas of the Order 34 Guideline:*

- a) Resources*
- b) Responsibility and Accountability*
- c) Competency Standards*
- d) Training Needs Analysis*
- e) Induction Training & Assessment*
- f) Emergency Response Training & Assessment*
- g) WHS Representative Training*
- h) Supervisor and Manager Training & Assessment*
- i) Training Required by Legislation*

**15** Commendable practices

**151** Improvement opportunities

**1** Non-conformance

**Order 34**  
Guideline 2024

Sections A1, A2, B1, B2, B3, B4, B5, B6 and B8

# Audit scope item 3: commendable practices

## CHPP but could apply at any

The HST Department has established a Training Project Plan.

The actions identified aim to achieve several key milestones within defined time frames, strategically aligned with the four pillars of the Training Framework: Design, Implement, Maintain, and Audit. Each phase of the project will be approached methodically to ensure sustainable outcomes and compliance with both internal and external standards. Each milestone is designed to contribute to a comprehensive, adaptive, and compliant training framework that supports both short-term and long-term workforce development goals. The alignment with the Design, Implement, Maintain & Audit framework ensures that this project will provide both immediate benefits and long-lasting improvements in training governance. Project deliverables will be tracked and managed through internal actions scheduled within the HST Team's Planner, with regular updates provided to the Project Control Group to ensure oversight and alignment.

Operations Training Needs Analysis format contains tabs for:

- Version Control information (Version, date and Change comments),
- Change Tracker ("Who was involved", "What was reviewed" and "Who is affected") and
- Proposed Changes (this is by role and competency with comments).

A Power BI reporting platform has been set up to report on Training and Competence for the operation.

All workers with computer access can access the reporting. The reporting has been set up to be able to see all workers' required competencies for any role they have been allocated at the operation as well as any specific competency. Compliance to the TNA can be measured through this platform. The Training Business Partner has begun to develop the crew minimum requirements to enable reporting for operational capability, but this has been parked due to the current state of operations.

# Audit scope item 3: commendable practices



## CHPP but could apply at any

A register of approved external training providers has been established and is available on the site document control system (SharePoint).

For the regular contractors at site an Onboarding Requirements checklist has been developed to aid the contractors in ensuring their workers have the required competencies to meet the requirements of their role.

The Checklist is Company/Task specific and designed in line with the scope of work being undertaken by those workers. This provides both the site and company with clear expectations to ensure workers are adequately prepared and equipped to perform their roles safely and efficiently.

Weekly meetings, one per month per production crew, and once per month with the Maintenance and Planning teams are held by the CHPP Training Officer with the Supervisor and trainer assessors to review the skills matrix and training compliance.

An action plan is developed to close any gaps and ensure workers remain current. A summary of the meeting attendance and outcomes is emailed to those in attendance to ensure actions are completed and everyone understands the plan.

A report is generated weekly from LMS which automatically populates the CHPP Training Matrix Spreadsheet.

This report shows the CHPP's compliance to their TNA, allowing them to know their gaps and ensure they are meeting all their training obligations.

# Audit scope item 3: commendable practices



## CHPP but could apply at any

Where equipment is engaged through and operated by external resources, they are required to complete a Contractor Competence Verification & Authorisation form.

This form has been created to include all types of equipment that may be engaged and based on selection pre-populates the following information which MUST be completed and provided prior to the worker operating onsite:

- Operator details
- Mandatory evidence
- Mandatory reading
- Sign-off by the Operator
- Once all complete is then signed off by the Manager.

There is an FAQ section in the operations Training & Competency Management System Assessment that provides key questions and answers to situations that all Trainer Assessors should be aware of.

This information is highlighted in the annual Trainer Assessor Workshops, including how to ensure paperwork is completed to the required standard and why this is important.

## The CHPP Training Officer develops a Contractor Skills Matrix Report book:

- by company,
- quarterly and
- prior to each major shut,

This enables easy reference for contract workers to check and update their competencies as required to undertake their work.

The reports are also provided to each contract company for their record and review.

# Audit scope item 3: commendable practices

## More CHPP specific

The CHPP is in the process of having new CHPP Operators complete a Certificate III in Resource Processing with the assistance of Natic. (2 x Operations)

The modules selected are relevant to the operation. Internal training packages for the CHPP have been mapped for the program to enable ongoing use post Certificate III completion.

### A CHPP - Step-up and Supervisor On-Boarding Program Manual which:

- Provides a structured framework for onboarding new step-ups and supervisors at the CHPP.
- Outlines required training, procedures, and management plans in a consolidated and accessible format.
- Includes a formal appointment process by the Manager, ensuring clarity and transparency in role expectations.
- Contains a dedicated logbook for recording training activities, experiences, and completed tasks.
- Serves as both a training record and performance tracker, supporting progression toward full supervisory appointment.
- References essential procedures and management plans relevant to the supervisory role.
- Aligns onboarding with regulatory and operational standards, ensuring compliance.
- Supports supervisors in applying key operational and safety protocols effectively.
- Facilitates a smooth transition into supervisory roles and promotes ongoing success.

# Audit scope item 3: commendable practices

## More CHPP specific

Stockpile Dozer Supplement Tool developed following a high potential incident.

Very well thought out and designed to meet the needs of operators to ensure they are given the appropriate time and experience to become competent to the required standard. It is a 5 Stage program that consists of the following (once pre-requisites are met):

- Stockpile operations simulation
- Dozer Familiarisation
- Basic dozer Stockpile operations
- Intermediate dozer stockpile operations
- Final Assessment Trigger

To progress to each stage Authorisation is required by the Site Manager or delegate.

For the CHPP Stockpile Dozer competency 3 x logbooks have been created:

- CHPP Stockpile Dozer - New Skill - Log Book Direct Supervision
- CHPP Stockpile Dozer - New Skill - Log Book Minimal Supervision
- CHPP Stockpile Dozer - RPL - Log Book

These logbooks outline the tasks that are needed to achieve competence in the practical assessments and provide clear evidence to show the trainees' exposure and progress for the required tasks.

# Audit scope item 3: improvement opportunities

## Improvement Opportunities applicable to all related to:

## No of IOs

### Competency Standards – Reference to applicable current Units of Competency

*Issues include training packages missing references to national units of competency, outdated or superseded units, and gaps in aligning site training with recognised standards.*

*Opportunities focus on reviewing and updating packages to incorporate current units, ensuring compliance with industry standards, and integrating relevant qualifications into CHPP and site frameworks.*

21

### Version control and review of training documents

*Problems with missing version numbers, inconsistent document control, overdue reviews, and unclear change history.*

*Improvements involve introducing robust version control, maintaining review registers, and ensuring all training materials reflect current legislation and operational requirements.*

19

### Supervisor Competencies

*Gaps in formal training and assessment for supervisors, unclear prerequisites, and outdated appointment forms.*

*Opportunities include developing structured programs for statutory and non-statutory supervisors, aligning competencies with SMS responsibilities, and standardising appointment processes.*

18

### Training Needs Analysis (TNA)

*Issues with incomplete consultation records, missing version control, and TNAs not reflecting current roles or operational changes.*

*Improvements involve formalising consultation processes, updating TNAs for accuracy, and ensuring alignment with compliance reporting and site systems.*

16

# Audit scope item 3: improvement opportunities

## Improvement Opportunities applicable to all related to (continued):

No of IOs

### Compliance reporting

*Limited or inconsistent reporting on training compliance, gaps in skills matrix accuracy, and lack of visibility for supervisors.  
Opportunities include implementing centralised reporting systems, improving LMS configuration, and enabling role-based compliance tracking.*

13

### Emergency Response Training

*Concerns about insufficient training for emergency roles, outdated plans, and gaps in practical refresher requirements.  
Improvements include reviewing emergency response plans, introducing regular practical drills, and ensuring competencies for ERT roles are tracked in TNAs.*

12

### Induction and refresher requirements

*Issues include inconsistent induction expiry periods, lack of clarity on refresher requirements, and no formal verification of online induction completion.  
Opportunities involve aligning induction frequencies with TCMS and LMS settings, introducing documented verification steps (e.g., supervisor sign-off or knowledge checks), and ensuring familiarisation processes are tracked for all workers.*

12

### Adequate resourcing of Workplace Trainer Assessor Role

*Limited number of Workplace Trainer Assessors and unclear processes for co-assessors/content experts.  
Improvements include training additional personnel, formalising co-assessor use, and ensuring adequate resourcing to maintain compliance and reduce bottlenecks.*

5



# Audit scope item 3: improvement opportunities

## Improvement Opportunities applicable to all related to (continued):

## No of IOs

### Site Safety and Health Representatives Role/Competencies

*Training for Safety and Health Representatives (SHR/ESHR) and WHS Committee roles not consistently tracked or reflected in TNAs. Opportunities include incorporating these roles into TNAs, verifying training records, and implementing reporting mechanisms for compliance monitoring.*

5

### Statutory Function Nomination Processes

*Gaps in verifying qualifications for statutory roles and inconsistencies in nomination/appointment terminology. Improvements involve reviewing Schedule 10 requirements, standardising terminology (Nomination/Appointment/Authorisation), and ensuring robust verification processes for statutory functions.*

5

### TCMS References

*Incorrect or outdated references in TCMS and related documents, creating compliance risks. Opportunities include reviewing and updating all TCMS references to align with current legislation and operational documents.*

5

### Incomplete worker records

*Training and assessment records incomplete or inaccurate, leading to compliance gaps. Improvements include auditing records, correcting LMS entries, and implementing processes for ongoing accuracy checks.*

3

### Training reference material

*Lack of standardised reference materials for assessments, causing reliance on informal knowledge sharing. Opportunities include developing comprehensive reference guides to support consistent training and assessment outcomes.*

3

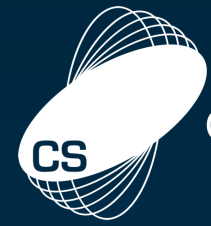
## Audit scope item 3: improvement opportunities

Improvement Opportunities applicable to all related to (continued):	No of IOs
Australian Coal Preparation Society (ACPS) courses ( <i>CHPP specific</i> )	1
How safety management system-controlled documents are accessed	1
Low Voltage Rescue training ( <i>for non-electrical</i> )	1
Reassessment frequency	1
Required qualifications for specific roles	1
Safety role for workers required under WHS (MPS) Reg 2022 ss 107(2)(e) and 114	1
Verification of high-risk work competencies	1

# Audit scope item 3: non-conformances

Order 34 Guideline Section	No of NCs
B4 Emergency Response Training & Assessment	
6.1 The TCMS must describe how the coal operation addresses the following matters in relation to emergency procedures and the operation's emergency plan:	1
6.1.6 "...details of the persons having the competency to fight fires and to train others in fire fighting" - WHS(MPS) Reg. Schedule 7 Emergency plans s 5 (4).	

# Something to remember



Coal Services

"You can't teach people everything they need to know. The best you can do is position them where they can find what they need to know when they need to know it."

- Seymour Papert

# Order 34

## 2026 Plan

# Order 34 in 2026

Undertake a review of  
the Order to refresh and  
make clearer

*Last updated 2007*

Conduct audits for  
underground operations

*Topic to be confirmed in  
the new year*

Run mid-year workshops as per previous  
years

- *1 x Underground (TBC) and*
- *1 x Open Cut (Hunter Valley Mines Rescue Station)*

# General discussion

Thank you and see you all next year.

For further information relating to this presentation, please contact:

[cindy.james@coalservices.com.au](mailto:cindy.james@coalservices.com.au)

For further information relating to Order 34 see our website:

[www.coalservices.com.au/mines-rescue/order-34/](http://www.coalservices.com.au/mines-rescue/order-34/)





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