

21 February 2024

E ntworksafe@nt.gov.au

Utilities Commission of the Northern Territory
GPO Box 915
DARWIN NT 0801

T 1800 019 115

Via email: utilities.commission@nt.gov.au

Dear Utilities Commission

Re: 2023 Review of Alcan Gove Pty Limited Exemption Document – Consultation Paper

Thank you for the opportunity to comment on the 2023 Review of Alcan Gove Pty Ltd Exemption Document Draft Decision. NT WorkSafe notes the Utilities Commission's proposal to amend Alcan Gove Pty Limited's (RTA Gove) licence exemption to include a safety management and mitigation plan (SMMP) provision similar to those which currently exist in generation and network licences.

NT WorkSafe acknowledges this measure would go some way toward ensuring SMMP requirements applicable to RTA Gove are consistent with those applicable to licensed entities. As set out in NT WorkSafe's submission to the Consultation Paper, NT WorkSafe holds the view that there does not appear to be persuasive reasons for RTA Gove's current practical exemption from SMMP requirements to continue, noting these requirements apply to operations of similar or smaller scale, including Rio Tinto subsidiary Energy Resources of Australia in Jabiru.

In addition to the inclusion of SMMP provisions similar to that in existing generation and network licences, NT WorkSafe respectfully requests consideration be given to include an additional provision requiring that RTA Gove's SMMP be prepared in consultation with representatives of industrial organisations of employees whose members are employees, and principal or primary contractors who perform electrical work and other work.

Such a provision would mirror the requirement applicable for licence holders as set out at section 77(3) of the *Electrical Safety Act 2022*. This section provides as follows:

77(3) *The safety management and mitigation plan must be prepared by the electricity entity in consultation with:*

- (a) *persons who are broadly representative of industrial organisations of employees whose members are employees of the entity; and***
- (b) *principal or primary contractors with the entity for the performance of electrical work and other work for the entity.***

In our view, such a requirement will assist RTA Gove to prepare a properly and fully informed SMMP. NT WorkSafe notes RTA Gove's submission that it already has standards and procedures in place in the form of the Rio Tinto Group Standard for Electrical Safety. In this context, the preparation of a safety management and mitigation plan affords an opportunity to consolidate the processes, plans, permits, standards and procedures that are referred to in the Rio Tinto Group Standard for Electrical Safety.

We thank you for the opportunity to comment on the 2023 Review of RTA Gove Pty Limited Licence Exemption Document Draft Decision.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Peggy Cheong', with a horizontal line underneath the name.

PEGGY CHEONG
Electricity Safety Regulator
NT WorkSafe