This form has been provided to assist stakeholder in making a submission on the Draft Code for the land transport of dangerous goods – Consultation Regulatory Impact Statement (C-RIS)

Submissions close on Tuesday 10 December 2024.

**Details of person submitting comments**

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| **Name:** | Bruce D G Olsen |
| **Email:** | bdgolsen@yahoo.com | **Mobile** (optional): | 0456560641 |
| If you are submitting comments on behalf of an association or organisation, please provide the following details. |
| **Organisation name:** | Ratepayers |

C-RIS questions. Please enter your comments in the row below each question.

***Note:*** *you are not required to answer every question.*

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| 5.4.6.1: Administrative controls – key changes |
|  | How will including information in the Code, that is currently only found in the regulations, help your organisation?  |
| This document may assist the local residents to convince the Local Shire to shut down the Truck Depot which was built within 200 metres of residential noise sensitive areas along with the removal of truckloads of Dangerous Goods.  |
|  | Should the dangerous goods safety advisor role be made mandatory? |
| Yes. The local Environmental Officer is a contractor in a major city who flies out to this town then disappears before anyone can ask him questions. He makes his decisions on what he sees or learns from the shire administration staff and his ex-cronies from university or ex work mates. Then they arrive at some ludicrous decision about how to handle the truck park noise and emissions which no one in their right mind would do. E.g. place a noise monitor in my bedroom when the procedure states 15 metres from my fence. The Truck Park is open to anyone including caravans and the general public. There are no guards or security and all people in some sort of authority including the police are difficult to contact as all and sundry stop at 4 pm, 5 days a week apart from public holidays. |

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| 5.4.7.1: Security requirements – key changes |
|  | We seek to understand to what extent transport providers already have measures in place to ensure the security of dangerous goods and costs associated with this. In particular:* Do you have a security plan in place for dangerous goods of security concern? If so, what costs are associated with the development and implementation of this per annum?

What, if any, additional costs would be expected from complying with these security Provisions? |
| There are no plans in place. For Intractable Wastes there are controls for transporting but as for any other goods it’s whatever signs or placards that are on the vehicles. One vehicle had a plasticised sheet of A4 paper which could be read from 1 metre away, emulsified explosives and trailer plates were SA. The truck was not attached to either of the two trailers and there was only the one trailer of emulsified explosive. The truck was gone for at least 2 days. This morning a truck and trailer were parked in the dirt truck depot and only had a UN number to identify the Toxic Contents.Another 2 truck/trailer units parked within 3 metres one LNG the other Ammonia Nitrate. |
|  | Do you consider the thresholds for high consequence dangerous goods, which would require the preparation of a security plan, are appropriate?If not, please explain why? |
| No there are no security plans as the local council staff and councillors have no idea of what the consequences are of issues which could occur. Even when it was brought up in a council meeting about fire at the truck park verges the answer left me gobsmacked. They are purely house wives that got voted into the council. |

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| 5.6.2.2.1: Special provisions that provide full or partial exemptions |
| For each concessional exemption applicable to your organisation (please include the special Provision number(s) in your response). |
|  | How many consignments of impacted goods do you consign per annum, on average? |
| All East West Traffic between Western Australia and Australia comes through this town. |
|  | Can you provide an estimate of the annual savings in dangerous goods surcharges these concessions would provide your business? |
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| 5.6.2.5.1: Australian specific special provisions |
| For all changes proposed for AU special provisions: |
|  | Are there any impacts you believe have not been identified and addressed?  |
| The Truck Depot in this town is basically a free for all to park where the driver wants to park which is usually as close to the toilet block as they can get. There is a gas fired BBQ a source of ignition along with non-intrinsically safe electrical fittings where any truck trailer carrying inflammable gas has to stay more than 3 metres from. Emailed local Governmental Safety Department to carry out a Hazop due to the fact that every transportable hazardous goods are parked in that Truck Park built next door to a service station and residential properties. No response back. |
|  | If so, please indicate the applicable special Provision number(s) and the associated impact(s).  |
| All of them. The most impacted are the local resident’s and visitors to this town. |
| For AU01 |
|  | If your operations are impacted by the changes made to AU01, what industry do you operate in and what articles would be impacted? |
| Safety is paramount to the public. What does SP 601 have to communicate the hazards? |
|  | If any, what operational implications would there be for your industry? |
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|  | How many large capacity consignment/packages would this change impact per year? What proportion of total consignments does this represent? |
| All East West Transportation as 90% of the vehicles in this truck park are bulk carriers with up to 4 trailers at times per unit. Little of no information of logistics carried on the outside of the vehicles. |
|  | If possible, please provide an estimate of the additional costs associated with this change, including packaging, preparation of transport documentation, and marking and labelling costs. |
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| 5.7.1.1: Packing instructions |
| For all proposed new or amended packing instructions applicable to your organisation (please include the provision number(s) in your response): |
|  | If your operations are impacted by these changes, what industry does your business operate in? |
| I suspect that the use of wood is allowing borer to escape the confines of Perth. Some timbers have borer holes when they arrive onsite from Turkey that pass through Perth.A heavy electrical motor turned up and the package was nailed together, when picked up via a telescopic forklift the nails did not hold and the whole lot collapsed upside down. Suggestion that nails should not be used but screws/bolts should be mandatory. |
|  | What are the implications on your operations? |
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|  | What is the volume of goods impacted by these changes? |
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|  | Are there any additional or reduced costs associated with the proposed new or amended provisions? |
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| 5.7.2.1: Use of portable tanks and MEGCs |
| If you transport dangerous in tube-vehicles: |
|  | Will the proposed new provisions for tube-vehicles have any impacts on your operations? |
| Trucks are now traveling with 2 or more dangerous goods, acid and caustic, Caustic and hydrogen peroxide. A UN Number check told me absolutely nothing about a toxic tank contents and I checked online to try and find out what the Toxic product was and it did not tell me. |
|  | What is the volume of goods impacted by these changes? |
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|  | Are there any additional or reduced costs associated with the proposed new or amended provisions? |
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| **5.7.3: Vacuum-operated waste trucks (vacuum tankers) and mobile explosives manufacturing units (MPUs)** |
|  | Do you have any concerns with the inclusion of vacuum waste tankers directly in the ADG? |
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| **5.8.1.1: Consignment procedures** |
|  | If the requirement for placards to be reflective is retained, what do you believe would be an appropriate transition time for compliance? |
|  | Are there any additional impacts/benefits from the removal of EIPs from IBCs that have not been considered? |
|  | What are the additional costs associated with the requirement to carry ‘Instructions in Writing? |
|  | Do you have any comments or concerns with any of the changes to Part 5 of the Code? |
| All the trailers or truck’s that carry dangerous goods the signage should be mandatory to enable the volunteer fire brigade to have some idea of what they are responding to. These days the trucks and trailers carry few if any placards and trucks seem to be painted white. |

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| **5.9.1.1: Design and construction of containment systems** |
|  | If you design, manufacture or use tanks and tank vehicles, do you foresee using the ADR-style tank designs in your operations? |
| ADR hmm some things are over censored yet other health and safety issues are ignored by ADR’s. |
|  | If you use segregation devices in your transport operations, do you consider that the updated requirements for segregation devices, or packagings used for segregation will affect your operations? |
| Mine site transportation of dangerous goods is segregated to what the driver requires. The sites stores department’s orders are placed on the trucks and trailers by the drivers and store persons in major cities to travel for 3 to 4 days before unloaded at the remote mine sites. |
|  | If yes to Q25 or Q26, please provide information |
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|  | Do you have any comments or concerns with any of the changes to Part 6 of the Code? |
| No  |

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| **5.10.1.2.1: Provisions concerning carriage of packages** |
| For all V codes proposed: |
|  | Are there any implications on your operations?* If so, please indicate the applicable V code(s) and the associated impact(s).
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| More confusion and more issues identifying the product in an emergency. |
|  | Are there any additional or reduced costs associated with the proposed new or amended provisions? * If so, please indicate the applicable V code(s) and the associated increase or reduction in costs.
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| All proposed V Codes? Codes mean nothing to the public in general and maybe a volunteer fireman may know. |

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| **5.10.2.1.1: Provisions concerning loading, unloading and handling** |
| **For all CV codes proposed:** |
|  | Are there any implications on your operations?* If so, please indicate the applicable CV code(s) and the associated impact(s).
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| The community and First responders. The UN numbers and all this other crap is going to cause major issues.Old system is KISS – keep it simple stupid. |
|  | Are there any additional or reduced costs associated with the proposed new or amended provisions? If so, please indicate the applicable CV code(s) and the associated increase or reduction in costs. |
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| **5.10.2.2.1: Segregation** |
|  | Do you agree with the proposal to allow segregation to be achieved using partitions? |
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|  | If the proposal for partitions is retained, should they be permitted only for non-liquid dangerous goods? |
| Mine site transportation of dangerous goods is segregated to what the driver requires. The sites stores department’s orders are placed on the trucks and trailers by the drivers and store persons in major cities to travel for 3 to 4 days before unloaded at the remote mine sites. |

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| **5.10.2.3.1: Stowage** |
|  | Do you agree with separating stowage and restraint requirements for protecting dangerous goods from the load restraint performance standards that apply to all vehicles (vehicle stability and loss of load)?  |
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|  | If the load restraint performance standards are included in the Code, what measures should be in place to ensure they remain current with the relevant legislation)? |
| Along the same lines as lifting equipment and tagged to show that an inspection has been carried out.  |

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| **5.11.1.1: Requirements for vehicle crews, equipment, operation and documentation** |
| For all changes proposed in Part 8: |
|  | Do you have any concerns or comments regarding the proposed changes. |
| Rest Stop Parking. <https://www.ntc.gov.au/sites/default/files/assets/files/ADG-Code-7.7.pdf>. In the case of this truck depot 13.1.3.2.2.1 is generally ignored. Its like parking in a Woolworths car park with less room to open a door without hitting the next truck, 8 metres is not the case more likely 1.5 metres and there is a motel across the road. Truck drivers disconnect from trailers for the rest period in some cases. What competent authority? the local shire is in no way competent at anything and they do not realise what a dangerous good is. The 15 metres for subsidiary hazard of 2.1, 3, 4 or 5 from a naked flame cost them a whole pile of money when I pointed out that the BBQ has a naked flame.At a glance there are a lot of issues ignoring just the parking section page 1233 in our local truck depot in <https://www.ntc.gov.au/sites/default/files/assets/files/ADG-Code-7.7.pdf> out here. |
|  | If so, please indicate the applicable change and the associated commentary. |
| CEO, Administration staff to lose their jobs and shutdown the truck depot. |

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| * **5.12.1.1: Requirements concerning construction and approval of vehicles**
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| For all changes proposed: |
|  | Do you have any concerns regarding the proposed changes for vehicles? |
| ADR do not cover the major issues concerning the public and drivers from the effects of Tonal Noise and Diesel Emissions. |
|  | If so, please indicate the applicable change and the associated commentary. |
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| **5.13.1.5: Regulation of diesel as dangerous goods for transport** |
| For all changes proposed:*NOTE: As discussed in the C-RIS, this will be subjected to further investigation. Responses to these questions will be used to determine the appropriate course of action for this work.* |
|  | If you transport diesel for your own use or supply, what is the maximum quantity you transport at one time?* If you typically transport more than 3,000 L of diesel at one time, please advise what volumes are typical, and what purpose you transport it for?
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| 1000 litres for mine site generators. |
|  | If you are a fuel transport company, do you transport loads of diesel only (without Class 3 flammable liquids) in tanks or tank vehicles that do not have a dangerous goods design approval issued by a Competent Authority?* If you use tanks without an approval, please advise why, and the type of tanks you use?
 |
| 500 litre plastic tank strapped onto the back of a ute. |
|  | Please advise if you support the following requirements for diesel transport for more than the low volume threshold (3,000 L in this proposal)?* Placarding of vehicles to provide hazard communication
* Emergency preparation, including developing a plan for incidents
* Fire extinguishers and emergency response equipment
* Transport documents and carrying emergency information
* Are there any other controls in transport you consider would be necessary?
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| The local truck depot was not designed to cope with any chemical spills. There is one fire hydrant and a volunteer fire brigade and no plans. I requested a Hazop but got no response from the appropriate governmental department. Local Shire total waste of time and effort to get them to do anything. There is no control. No sign of an extinguisher that I can recall. Placarding on trailers and trucks does not provide a clear understanding to the public. The public probably get to truck incidents before most emergency crews and it may pay to make it clearer. |

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| **5.13.2.1: Mixed load EIPs for refined petroleum products** |
|  | Which of the following two options do you prefer?* **Option 1** Retain the Provision 5.3.2.1.3 as redrafted above.
* **Option 2** Limit the use of 5.3.2.1.3 to refined petroleum products of Class 3 and GHS Category 4 flammable liquids
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|  | Are you aware of any unintended consequences if Option 1 is adopted? |
| no |

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| **5.13.3.4: Incorporation of Class 1 explosives into the Code** |
| The NTC is seeking information on the inclusion of Class 1 explosives into the ADG Code: |
|  | If you transport Class 1 explosives, are there any provisions for the transport of these substances or articles in the draft Code that will significantly impact your transport operations? |
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|  | If you transport Class 1 explosives, are there any provisions for the transport of these substances or articles in the draft Code that you consider need to be included in the draft Code? |
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|  | Do you consider applying the high security risk load requirements to all explosives Category 3 loads appropriate?  |
| Additionally, the NTC is seeking data or information on the following: |
|  | Do you undertake any transport of Class 1 explosives in tanks? * If yes, please provide information about types and quantities.
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|  | Do you undertake any transport of Class 1 explosives in IBCs?* If yes, please provide information about types and quantities.
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| **15.3.4.1: Transitional provisions for the draft Code** |
|  | Do you support the NTC introducing more detailed transitional provisions into the Code? |
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|  | Do you have any concerns with the proposed principles for transitional provisions? |
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| **5.13.5.4: Transport categories** |
| For all questions, please provide any supporting information you have to assist us in finalising these provisions. |
|  | After reviewing the draft provisions in 1.1.3.6, please advise: |
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|  | Should all infectious substances be subjected to a “0” threshold? |
| no |
|  | Are there particular transport scenarios for Category B infectious substances that require a specific concession or exemption? |
| No |
|  | Should toxic or corrosive gases be subjected to a lower threshold than “250”? * Note for comparison, ADR uses a threshold of “20” for these substances.
 |
| no |
|  | Should self-reactive substances and organic peroxides be further divided up?* Note for comparison, ADR assigns a threshold of “20” for types B & C, and any of these substances that require temperature control to remain stable in transport.
 |
| Duel loads of Hydrogen Peroxide and Caustic Soda. yes |
|  | Should aerosols be treated like other gases, and be subjected to a lower threshold for higher risk aerosols?* Note for comparison, ADR assigns a threshold value of “20” for toxic and corrosive aerosols, and “333” for flammable aerosols.
 |
| yes |
|  | Do you consider that including the transport categories in the dangerous goods list will assist you to determine if a load is a small load or not? |
| The size does not rule out the signage. |
|  | The specific concessions for transporters of small loads are included in 1.1.3.6.6. Are there any concessions that you think are, or are not, appropriate to include? |
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|  | Do you consider there are other substances or articles that should be included in the “0” threshold category? Placarding is mandatory for anything included in this category. |
| Placarding is mandatory |
|  | Do you consider there are other substances or articles that should be included in the “unlimited” threshold category? Placarding is not required for anything included in this category. |
| Placarding is mandatory for Dangerous Goods of any size. No other options no placard no transportation. |

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| **5.13.6.2: Driver licensing** |
| NOTE: As discussed in the C-RIS, this will be subjected to further investigation. Responses to these questions will be used to determine the appropriate course of action for this work. |
|  | Do you support different requirements for driver and vehicle licensing? |
| No. |
|  | Do you consider that formal training for drivers would be useful in cases where a driver does not need a licence? |
| No Licence no job. |
|  | Do you support the introduction of a notification scheme for vehicles that don’t require a licence? |
| no |

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| **6.2.2.4: Change in one-off costs required to comply with the draft Code (suppliers and manufacturers)** |
|  | How many people within your business will need to be retrained to support compliance with the draft Code? What is the expected training cost per person? |
| all |
|  | How much will it cost to update your systems to incorporate the proposed changes to the DGL and placarding thresholds? |
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|  | How much will it cost to update processes and documentation? |
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|  | Are there any one-off costs anticipated for your business? |
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| **6.2.2.5: Change in ongoing costs required to comply with the draft Code (suppliers and manufacturers)** |
|  | We are keen to understand the expected benefits and costs of key changes presented in Table 16, and particularly welcome any data or case studies to evidence these impacts.  |
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| **6.3.2.3: Change in one-off costs required to comply with the draft Code (transport industry)** |
|  | How many people within your business will need to be retrained to support compliance with the draft Code? What is the expected training cost per person? |
|  | How much will it cost to update processes and documentation? |
|  | How much will it cost your business to update firefighting and emergency equipment to comply with the draft Code? |
|  | What are the cost savings associated with the changes to the requirement for emergency escape masks? |
|  | Are there any one-off costs anticipated for your business? |
|  | One off cost? At the rate of importing unexperienced drivers one would expect an ongoing program followed by auditing and retraining. |

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| **6.3.2.4: Change in ongoing costs required to comply with the draft Code (transport industry)** |
|  | We are keen to understand the expected benefits and costs of key changes presented in Table 18, and particularly welcome any data or case studies to evidence these impacts.  |
| Benefits? Shutting down the truck depot would have major health benefits for the local residents and tourists as the noise, dangerous goods and emissions would be parked at least 500 metres from the town. As to explosions of Ammonia Nitrate the town would still need to be evacuated as a 2.5 kilometres circumference would need to be cleared of people. Case study has already been undertaken with previous explosions and major chemical spills. |

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| **6.4: NTC, Regulators and Competent Authorities** |
|  | We seek data from each State & Territory on the number of dangerous goods inspectors and other staff that are actively involved in the administration and enforcement of the Code. |
| Data? There are no checks carried out in the local Truck Depot as that depot is controlled by the local shire that built it bypassing all rules and regulations in their efforts to spend the money before they lost it and then proceeded to advertise what a good job they did by making a truck depot for the drivers to stop and rest in town. They are clueless when it comes to dangerous goods. Complaints to the nearest inspectors or Government agency are generally ignored including a request for a Hazop to be carried out at the truck depot after the last Ammonia nitrate explosion. All requests for a Government Department to stand up and give a shit are merely passed back to the local shire. |

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| **6.4.1.2: Reduced complexity and difficulty in administering compliance with the Code** |
|  | Referring to Section 3.3 Special Provisions, which remove the need for Competent Authority intervention (see Section 5.6.2.4), we’d like to understand from Competent Authorities:* Approximately how many interventions of this type are currently made per year, on average.
* Approximately how much time is associated with each intervention, on average (i.e. the time it takes for a Competent Authority to reach an outcome/decision from when first approached).
* Approximate effort associated with each intervention, on average (i.e., number of hours by staff level and wage per hour).
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| There is no Competent Authority in this town already until something happens. And so far 3 years of complaints have not managed to make any change to the situation.  |
|  | By comprehensively addressing gaps and errors in the current Code, the NTC is expecting that this will reduce the number of industry submissions to Competent Authorities, in particular the number determinations. We seek data from Competent Authorities on the effort expended on each determination, on average (i.e., number of hours by staff level)? |
| NTC, EPA, DMIR, DEWR, Road and Rail, Dept of Planning, DOT, Catherine King, Neil Thomson, Reece Whitby to name a few people or Government Departments contacted in regards to issues and the response is contact your local shire ….and EPetitions read out in the House of Representatives.And Federal Representatives who say it’s not their issue. Obviously all Australia is not part of their small insignificance existences since it’s only a 3 year job to be an MP. Australia’s highest paid Centrelink unemployed workers. Gaps I have not addressed the EPA….yet |

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| **6.4.1.3: Government costs associated with implementing the draft Code** |
|  | We seek estimated costs from each State & Territory to implement the draft Code, as per the breakdowns provided in the list above. |
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|  | Are there any State or Territory specific impacts that need to be considered? Please provide details. |
| The Public and Local shires. The Public or rate payers are the most ignored when it comes to questions regarding our health and safety. Local Shires are totally unqualified to make decisions for the Publics or Truck Drivers safety and yet they believe they are doing the right thing to provide a place for the drivers to rest. The Local Shires have no idea on the consequences of issues which can occur and also the issues which are in place that are totally inept at handling any crisis caused by their mismanagement and ignorance even when an incident occurs outside their jurisdiction that can occur in their truck depot or road train assembly area.The Truck Depot is a slightly sloped area towards the main road with nothing stopping the flow of spills flowing past motels, residential properties and a service station with above ground tanks of fuel and gas which would be impacted by any major spillages or fires thus closing the main east west road until the situation is taken care of or burns out. After observing two fires at the Truck Park verges and the standard no smoking rules and no lighters for Natural Gas truck drivers the council were asked to ban fires and smoking from the Truck Depot, response was “burning permits are required from October 01 each year. From Nov 01 to 31 March all burning is prohibited”. There is nothing installed apart from the storm water drainage system to cope with any chemical spills. The storm water drain runs under a main access road past the front of the local service station which has Gas, Petrol and Diesel above ground storage tanks. Then it runs across open grassed area towards the main road south and under that road towards a residential property.The Local Volunteer Fire Crew are just that Volunteer’s and would require the services of another crew from 38 Kilometres away. Problems with the Shires Truck Depot were pointed out to them 2 years before the last truck explosion and questions asked about public safety and the fact that the whole town in the 2.5 kilometre radius would have to be evacuated if an explosion was to occur. A driver fell asleep driving through town and crashed into the building next door to the shire president’s house. Set fire to 2 buildings and knocked over a power pole. Another driver it appears from the tracks that they ran off the main road into a deep ditch then managed to control the vehicle missing a power pole to get back onto the main road. In Western Australia the Local Shires have more power than a Government Department as any questions to a Government Department are sent back to the Local Shire. Any serious issues that the Public have concerning Dangerous Goods are then attended to by the Local Shire. Road Trains park where they want to and the gap between vehicles is similar to a Woolworth’s car park where your door hits the vehicle alongside.Trailer Placarding at times is not good as previously mentioned one containerized tank had an A4 sheet of paper difficult to read which said Emulsified Explosive and the vessel has a temperature gauge showing the contents temperature. That emulsified explosive trailer and its second attached trailer sat in the truck depot without a truck for 2 days.Trucks are now arriving towing trailer’s containing Hydrogen Peroxide and caustic soda. Parked next to a trailer load of 14 or more bulki bins full of various oils. That trailer had no truck attached.General Notes:Noise emissions. Tonal Noise is being emitted during the truck drivers rest periods with noise levels from diesel engine air conditioners at 80 decibels. According to ENhealth the decibel levels for a good night’s sleep is 30 to 35 for the local residents so what levels are a truck driver subjected to? The Refrigerated Trailers sound like someone is beating a drum. These noises are for the length of time that a truck driver is parked at a rest stop. In a Truck Depot that means Tonal Noise for 24 hours a day 7 days a week. Times that by the number of vehicles in the Truck Depot. The general public’s complaints are ignored as Australia needs trucks. Trucking companies ignore their drivers and the general public’s complaint’s as it costs money to service their vehicles. Complaints to the driver are a waste of time as they want their sleep but so do the shift workers who have to put up with the Tonal Noise and Emissions for the drivers rest stop. Even Drivers complain online when a truck with an ice pak turns up.Federal Government and ADR;s do not cover the Noise emissions from refrigerated containers nor Truck mounted Diesel engine powered Air Conditioners. No Government Department will admit to being the responsible department to govern these Tonal and Diesel Emission issues. All questions go back to the Local Shires to control and they are in no way capable of doing this job. It is rumoured this shire has told residents if you do not like the noise sell up and leave.Diesel emissions. The Air Conditioners and Refrigerated Trailers have Diesel Engine Driver units which emit cancer causing substances. There are no ADR for these units and in a Truck Depot at rest stops that equates to 30 interstate trucks with 3 trailers per unit 4 engines emitting cancer causing substances totals roughly 120 engines. Health and Safety is ignored for the drivers and public once again.Drivers have the manifests but at times I doubt the training. They are usually tied grumpy and not responsive to public complaints about the trucks noisy Diesel Engine fired Air Conditioners and Diesel fired Refrigerated Trailers which produce Tonal Noise and Cancer causing Diesel Emission’s.Came across 2 Indian drivers 5 kilometres south looking rather glum at a dolly attached to the back of a trailer which had 12 burst tyres out of 16.There are a lot of complaints out bush in regards to truck drivers with 3 trailers ignoring road rules and passing at double white lines, around corners and up slopes at speed. Cars swerving off the road to save themselves getting injured or killed. Up to 3 drivers in a truck managing to get interstate to Western Australia with none on board with the correct licences.Local Mechanics pointing out to Truck Drivers that the Truck they are driving is not capable of hauling the weight of overloaded 3 to 4 trailers.The Trucks drivers speed through outback towns at 100 kilometres an hour in an effort to meet a timetable as they know what time to local law enforcement officers are at work.Vehicles do not have anything on the outside to give any indication as to what is being transported, what the company name is and the vehicles are all one colour … white. This morning’s one had a pressure gauge on the vessel shaped trailers.Drivers disconnect from their trailers to travel 38 Kilometres to the next city. Drivers light fires next to their trucks in the truck depot, people walk past smoking. Nothing stopping the general public walking through the Truck Depot. Kids riding their bikes and electric scooters across the tar sealed pot holed, dusty, diesel and oil spill stained park. One toilet and shower block and where do the truck drivers park? As close as they can and the damn tonal noise goes right through this house making the walls vibrate.As mentioned every dangerous goods that can be transported will end up in this truck depot. The local mine sites or even further remote operations get their stores replacements sent up on a truck and trailer not necessarily segregated to regulations and has numerous hazardous goods on them.The Vehicles. ADR’s cover quite a number of items but as noted around here that certain issues are not regulated and Interstate or national license plated vehicles do not carry placards. Some of the vehicles and the trailers on the roads these days should not be allowed on the roads due to their substandard level of maintenance especially when the rail system is closed to travel. And there is very little or no controls in place to safeguard the public. In 3 years the only money spent was the bollards around the gas fired BBQ because as I pointed out there was/is a naked flame but yet the council allows fires and smoking in the truck depot.All the authorities in town close at 4 pm. The local police and shire go home. It would be difficult to contact anyone one leaving the emergency 000 as the last resort. Local Police calls at times can take 45 minutes to get anyone to answer and I know that as a fact. They do not take smart arse remarks kindly when it’s pointed out that it would be quicker to drive to the next town and back in 45 minutes.A truck with two trailers Toxic and corrosive. Nothing informs me as to the contents and the only way I would find out would be to research the UN numbers on the internet. As for calling 000 it may be able on the Nullabor to contact someone but unless it’s a satellite phone I’d probably have to get a passing vehicle to try when they get into range of a Telco or one of those phones on a pole in the middle of nowhere.. |

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| **6.5.1.1: Avoided dangerous goods transport incidents due to improved compliance with the draft Code (avoided costs to the community and government)** |
|  | We seek any updates on the data set out in this section including data on the:* The number of dangerous goods road and rail incidents.
* The proportion of incidents involving a fatality, serious injury, minor injury or spill.
* The costs associated with each type of incident above.
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| There are incidents daily which are never reported. Trucks drivers coming interstate are on a time table and some drivers ignore the speed limits and distances between their trucks to save a dollar. Makes it difficult for other road users to pass safely |

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| **Toilets not just the Truck Drivers but other road users as well.** |
|  | Truck park rest stops. |
| **Toilets:**Have any of you crossed the Nullabor in the past 5 years?The road is long and the drive can be boring. There are rest areas along that road. Toilets are few so there is disgusting piles of excretion and toilet paper some with a rock holding it down. There are tar sealed and dirt Interstate Truck rest areas in town and at times that has these little piles of crap on the verges. White paper under the Pepper trees and along the Truck Park verges where drivers leave their excretion for the Local Shire workers to clean up.The Truck Depot was full up with an ore haulage company using it as a service and parking area for the increasing number of trucks and trailers at the last count 19 trucks and 3 trailers per unit in various stages of disrepair. The Interstate Trucks then parked where they could and when the wind blows there are white streamers hanging in the gum trees. The Council workers need to be vaccinated against infectious diseases e.g Hepatitis.Hazardous waste is also shit to put it bluntly and everyone does it.Australia needs outback toilets as well.**Plastic Bottles of Lemon Coloured Water:**The use of plastic bottles to urinate into and throw away. |
| **Rubbish not just Truck Drivers but other road users as well.** |
| Truck park rest stops. |
| **Rubbish:**Drivers sit in their cabs eating takeaway food. When they finish they should use the rubbish bins provided but not always.One bag of paper towels, soft drink cans and food scraps were thrown out of the truck door and left for someone else to clean up that mess which has blown across the yards.**Truck tyres:**Are left at rest stops as the local shires do not want 30 plus tyres so the service people hide them at the rest areas at night for someone else to remove.**Used Truck Parts:**Left at the side of the roads or truck parks for someone else to remove.**Oil spills:**The Local shire when they decide to start work Monday to Friday use sand to cover oil or minor chemical spills when told to do so by their supervisor. The sand turns to dust as the heavy vehicles spread it across the asphalt. |

There is other issues e.g

* + Speeding of road trains which pass other road users on double white lines, blind corners, slight slopes or hills with little or no regards for the vehicles and people they are passing.
	+ Ignoring the 50 km speed limit in town.
	+ Use of exhaust brakes at 3:30 to 5 am
	+ Driving too close to other road trains not allowing space for other road users to safely pass.
	+ Lack of maintenance to truck air conditioner diesel engines that produce Tonal noise.
	+ Lack of concern for the residents who live in small towns when it comes to parking in the main street.
	+ Disconnecting from their trailers to drive to the next town for 2 or 3 days leaving the noisy refrigerated trailers idling away less than 30 metres from a motel unit 24 hours a day.
	+ Mechanics refusal to work on trucks with holes cut in the floor of the cabs.

Australia needs Trucks ….