



National Transport Commission

Email: adgcode@ntc.gov.au

Attention: Ms Debra Kirk and Mr Matt Arkell

Dear Debra and Matt

Draft Code for the Land Transport of Dangerous Goods: Consultation Regulatory Impact Statement – WorkSafe WA submission

Thank you for the opportunity to respond to the draft Code for the Land Transport of Dangerous Goods: Consultation Regulatory Impact Statement. A comprehensive response to the submissions form is provided. However, I would like to take this opportunity to highlight specific concerns Western Australia has concerning several proposed provisions. The comments below are considered necessary to maintain the safety and effectiveness of the Code:

1. Exemptions for Extremely Short Journeys: Western Australia do not support the inclusion of exemptions for "extremely short journeys" that cross public or private roads that are accessible to the public.

The term "extremely short journey" lacks a clear definition. The Code should apply regardless of the distance travelled.

Excluding transporters from compliance with the Code based on the journey length creates unacceptable safety risks. This exemption would significantly reduce safety and is inconsistent with the current Code and ADR.

2. Insurance Sum Increase: It is recommended the minimum insurance sum of \$5 million be revised to reflect contemporary inflationary pressures and the increased costs associated with incidents. The current sum has remained unchanged for 15 years and is no longer adequate to cover the rising costs of housing, environmental remediation, and other liabilities.

3. Segregation and Load Restraint Requirements: The segregation and load restraint requirements as provided in the draft Code are not supported. These provisions introduce increased risks and reduce overall safety standards.
4. Licensing of Non-Tanker Vehicles in Western Australia: Western Australia seeks to retain its current position of not requiring licenses for non-tanker vehicles. The existing system has proven effective and should not be altered under the draft Code.
5. Design Approval Requirements for Bulk Containers: Western Australia's current design approval requirements for bulk containers used to transport solid dangerous goods should remain unchanged. These requirements ensure safety and compliance with state-specific needs such as large-scale mining activities.

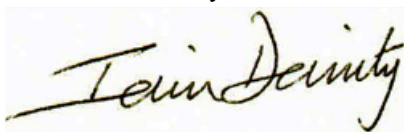
Western Australia would also like to take this opportunity to raise concerns with the limited consultation period made available to comment on the draft Code.

The transport of dangerous goods is complex, and safety is paramount, Therefore, it is critical effective engagement with stakeholders is undertaken, and all perspectives adequately considered.

Unfortunately, the timeframe made available for consultation has not provided sufficient opportunity for thorough analysis, stakeholder collaboration, and the preparation of detailed responses. A protracted consultation risks key insights from industry, regulators, and other stakeholders being overlooked, with potential unintended safety and operational consequences. I urge the National Transport Commission to extend the consultation period to allow for more robust and inclusive feedback.

Once again, I thank you for the opportunity to provide input into this consultation process, and welcome further discussion on matters raised in Western Australia's submission.

Yours sincerely



Iain Dainty | Acting Director WorkSafe Petroleum Safety and Dangerous Goods
WorkSafe Petroleum Safety and Dangerous Goods Directorate
05 December 2024

*Chief Dangerous Goods Officer
Western Australia*

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

Name:	WorkSafe WA		
Email:	dgsb@demirs.wa.gov.au	Mobile (optional):	
If you are submitting comments on behalf of an association or organisation, please provide the following details.			
Organisation name:	Department of Energy, Mines, Industry Regulation and Safety WA		

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

Note: you are not required to answer every question.

5.4.6.1: Administrative controls – key changes	
Q1.	How will including information in the Code, that is currently only found in the regulations, help your organisation?
<p>WorkSafe WA is of the view that technical information is better placed in a code rather than regulation. Inclusion of technical information being included in a code presents the following advantages:</p> <ul style="list-style-type: none"> • <i>Flexibility:</i> There is more flexibility in updating a code, as it is not bound by process requirements to change regulations. • <i>Law:</i> Regulations should provide the general legal framework and principles. While a Code provides specific technical requirements to comply with the regulations. • <i>Expert Review:</i> The Code is updated at least every two years by the NTC with input from technical experts at CAP and from industry. The regulations are not expected to be reviewed or updated as frequently as the Code. • <i>Consistency:</i> The state regulations should reference the technical information in Code, ensuring national consistency. <p>WorkSafe WA do NOT support the inclusion of proposed new clause 1.1.3.13 Exemptions relating to extremely short journeys that cross public roads.</p> <p>The Code should apply if the journey occurs on a public road or private road accessible to the public, regardless of the distance travelled. Additionally, no definition of “extremely short journey” is provided.</p> <p>Consideration needs to be given to the frequency of the dangerous goods transport between sites. While the distance travelled may be 100 metres, frequent movement between sites on a major road with heavy traffic, or in close proximity to concentrated public areas or health care facilities, presents a safety risk.</p> <p>Where a transporter is excluded from specific requirements of the Code when undertaking a ‘short journey’, serious issues may arise in the event of an incident (no labelling, no transport</p>	

document, no safety equipment, no placarding, no approved packaging, no training, no fire protection).

Incidents have occurred in WA involving trucks and road licensed forklifts (carrying fully loaded dangerous goods IBCs) moving across public roads on short journeys.

To provide for this exclusion would be a significant reduction in safety. WorkSafe WA cannot support this. Clause 1.1.3.13 is not in the current ADG Code, nor in the ADR yet it appears in the new draft Code.

The insurance sum under Clause 1.8.5.4.1 should be increased. The insurance sum is currently \$5 million and does not take into account inflation and other costs since it was implemented 15 years ago.

Q2. Should the dangerous goods safety advisor role be made mandatory?

WorkSafe WA do not believe the dangerous goods safety advisor role should be mandatory. There are no data to indicate how many dangerous goods safety advisors will be needed or what training is required. Mandating the role in the Code may lead to unnecessary financial and operational risks to carriers.

Competent Authorities should not administer or manage an accreditation system for dangerous goods safety advisors.

5.4.7.1: Security requirements – key changes

Q3. 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?

N/A

Q4. 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?

There may be some unintended consequences with the class lists and thresholds in the table. Some specific dangerous goods in classes that are not of security concern may be captured, while others that are of security concern may not be captured.

While WorkSafe WA acknowledge the simplicity of the class system, substances that require a security plan are best dealt with by UN number, not by class. There should not be an increase in administrative burden on transport companies without a significant increase in security outcomes.

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).	
Q5.	How many consignments of impacted goods do you consign per annum, on average?
WorkSafe WA oversee the special provisions rather than consign and transport dangerous goods. However, WorkSafe WA are aware these special provisions are widely used by various industries impacting a substantial number of consignments.	
Q6.	Can you provide an estimate of the annual savings in dangerous goods surcharges these concessions would provide your business?
These changes do not prevent companies charging dangerous goods surcharges.	

5.6.2.5.1: Australian specific special provisions	
For all changes proposed for AU special provisions:	
Q7.	Are there any impacts you believe have not been identified and addressed?
WorkSafe WA has not seen any data, statistics or evidence to justify an increase in regulation for UN3077 and UN3082 (AU01). Additional impacts could arise from potential safety risks if exemptions are not consistently applied. A periodic review mechanism should be introduced to help address any unintended consequences.	
Q8.	If so, please indicate the applicable special Provision number(s) and the associated impact(s).
AU01	
For AU01	
Q9.	If your operations are impacted by the changes made to AU01, what industry do you operate in and what articles would be impacted?
In WA, changes to AU01 would have impacts on the agricultural sector. The following is an extract WorkSafe WA received from a consultant, "Class 9 UN3077 and U3082 products are NOT dangerous goods for storage and licencing. This is because the State's Dangerous Goods (Storage and Handling of Non-Explosives) Regulations exclude these products by referencing the special provisions of the ADG code (see Regulation 8 sub-regulation 4 below). If the special provision AU01 is removed from the ADG Code, the products with UN numbers 3077 and 3082 WILL be DGs in WA and will need to be included in the DG	

<i>site licences, be stored in a banded location, and be included in the risk assessments that support the licences. It also means that the quantities of these products will have to be considered when calculating the threshold quantity for a site to require a DG licence.”</i>	
Q10.	If any, what operational implications would there be for your industry?
The number of dangerous goods storage licence applications and amendments would increase. WorkSafe WA has been informed by one company that this would be at least 49 sites from the company.	
Q11.	How many large capacity consignment/packages would this change impact per year? What proportion of total consignments does this represent?
N/A	
Q12.	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.
N/A	

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):	
Q13.	If your operations are impacted by these changes, what industry does your business operate in?
PP16 Notes should be standard text as notes are not enforceable. A note should be used as a tool to direct the user to other relevant sections of the code.	
Q14.	What are the implications on your operations?
Enforcement and compliance issues will result as notes in codes and legislation are not enforceable.	
Q15.	What is the volume of goods impacted by these changes?
N/A	

Q16.	Are there any additional or reduced costs associated with the proposed new or amended provisions?
N/A	

5.7.2.1: Use of portable tanks and MEGCs	
If you transport dangerous in tube-vehicles:	
Q17.	Will the proposed new provisions for tube-vehicles have any impacts on your operations?
N/A	
Q18.	What is the volume of goods impacted by these changes?
N/A	
Q19.	Are there any additional or reduced costs associated with the proposed new or amended provisions?
N/A	

5.7.3: Vacuum-operated waste trucks (vacuum tankers) and mobile explosives manufacturing units (MPUs)	
Q20.	Do you have any concerns with the inclusion of vacuum waste tankers directly in the ADG?
Inclusion of vacuum tankers in the Code would be beneficial, as it would ensure requirements are readily available and provides sound regulatory framework for approvals.	

5.8.1.1: Consignment procedures	
Q21.	If the requirement for placards to be reflective is retained, what do you believe would be an appropriate transition time for compliance?
WorkSafe WA suggest advice should be sought from industry on transition times. This may be linked to the lifetime of the truck, or approximately 10 years, to allow carriers adequate time to implement reflective placards.	

Q22.	Are there any additional impacts/benefits from the removal of EIPs from IBCs that have not been considered?
Advice from the emergency services should be followed as EIPs are primarily for their use.	
Q23.	What are the additional costs associated with the requirement to carry 'Instructions in Writing'?
<p>The Code should not include these written instructions and should not be mandated. In an emergency detailed written instructions are of little value to the driver. The driver should be trained in the use of the emergency equipment.</p> <p>The driver already has Australian New Zealand Emergency Response Guide 2021 (ANZ-ERG), Transport Emergency Response Plan (TERP) and Safety Data Sheets. The introduction of another new document is not required as the ANZ-ERG is far more detailed and contains more specific information.</p> <p>WorkSafe WA is not aware of any data, statistics, or evidence to support an increase in regulation in this area.</p>	
Q24.	Do you have any comments or concerns with any of the changes to Part 5 of the Code?
N/A	

5.9.1.1: Desing and construction of containment systems	
Q25.	If you design, manufacture or use tanks and tank vehicles, do you foresee using the ADR-style tank designs in your operations?
<p>WorkSafe WA has not seen any data, reports, or statistics, that support the inclusion of ADR tanks in the Code. The proposal to include ADR tanks creates several issues which the NTC sought to address as demonstrated by the questions in working paper 8.</p> <p>Further justification is needed as to the inclusion, other than alignment with the ADR.</p>	
Q26.	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?
N/A	
Q27.	If yes to Q25 or Q26, please provide information
N/A	

Q28.	Do you have any comments or concerns with any of the changes to Part 6 of the Code?
<p>In Clause 6.15.1, there are errors with the references in the clause:</p> <p>Change 6.11.2 to 6.15.2</p> <p>Change 6.11.3 to 6.15.3</p> <p>Change 6.11.4 to 6.15.4</p>	

5.10.1.2.1: Provisions concerning carriage of packages	
For all V codes proposed:	
Q29.	Are there any implications on your operations? – If so, please indicate the applicable V code(s) and the associated impact(s).
N/A	
Q30.	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.
N/A	

5.10.2.1.1: Provisions concerning loading, unloading and handling	
For all CV codes proposed:	
Q31.	Are there any implications on your operations? – If so, please indicate the applicable CV code(s) and the associated impact(s).
N/A	
Q32.	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.
N/A	

5.10.2.2.1: Segregation	
Q33.	Do you agree with the proposal to allow segregation to be achieved using partitions?
<p>WorkSafe WA does not support the proposal to allow partitions as this presents an increased risk and a reduction in safety.</p> <p>The segregation table and text in 7.5.2 states segregation applies to packages. The definition of package on page 27 does not include tanks. Worksafe WA suggests adding the words “and tanks” after “packages” throughout Section 7.5.2</p> <p>Segregation in the new Code is based on bearing placards or labels. Consideration should be given to situations where the dangerous goods are unlabelled/unplacarded or incorrectly labelled/placarded. It should be based on what dangerous goods is transported rather than the label.</p> <p>It is recommended that V50A, under Section 7.2.4, be amended to include packages and included under General Provision of Section 9.1.</p> <p>Section 7.5.4(b) should include corrosive dangerous goods (No. 8).</p> <p>Section 7.5.4(c) the distance should be changed from “by a space of at least 0.8m” to “by another vehicle forming part of the same combination road vehicle.”</p>	
Q34.	If the proposal for partitions is retained, should they be permitted only for non-liquid dangerous goods?
<p>WorkSafe WA do not support the proposal to allow partitions.</p>	

5.10.2.3.1: Stowage	
Q35.	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)?
<p>Dangerous goods loads pose a higher risk on the road than general freight. Therefore, dangerous goods loads should comply with the load restraint guide that applies to all vehicles, and additional restraint requirements to help mitigate risks associated with the transport of these materials.</p>	
Q36.	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?
<p>The draft Code and working paper 10 propose to remove the requirement for gates to function as a secondary mechanism to contain dangerous goods that come loose on a load.</p> <p>While the Code and working paper state that these changes would not result in any negative impacts or reduction in safety outcomes, WorkSafe WA would like to see data and/or modelling to support this claim.</p>	

Another method to ensure secondary containment of the load may be considered for dangerous goods if gates are not the best solution from an WHS perspective.

5.11.1.1: Requirements for vehicle crews, equipment, operation and documentation

For all changes proposed in Part 8:

Q37. Do you have any concerns or comments regarding the proposed changes.

ADG Review Paper 12 states, "During earlier consultation, there was significant support for simplifying the extinguisher requirements, but there was also opposition to basing the extinguisher requirements entirely on vehicle mass alone."

WorkSafe WA strongly urge the NTC to act on this feedback and use other criteria instead of vehicle mass for determining fire extinguisher requirements while simplifying the requirements. There are many hazards and factors that need to be considered. Fighting fires involving dangerous goods depends on circumstances and the properties and quantities of the dangerous good. The Code needs to include this as part of risk-based fire extinguisher requirements, rather than vehicle mass.

It is suggested Clause 8.1.4.1.1 be deleted and Clause 8.1.4.1.2 amended to remove the 4.5 tonnes. This would remove the criteria for under 4.5 tonnes GVM/GCM as this is not in the current Code and linking fire protection to GVM/GCM is not risk based. This would make the clause simpler to enforce, understand, and train by not splitting fire protection up into below 4.5 tonnes and above 4.5 tonnes.

Q38. If so, please indicate the applicable change and the associated commentary.

Personal protective equipment (PPE) requirements should be considered for crews on dangerous goods trains. Advice should be sought from the ATSB report on the Julia Creek Derailment, "During evacuation, the train crew noticed vapour emanating from the wreckage (derailed tanker wagons). The train crew were not equipped with PPE specific to the sulphuric acid product transported."

Clause 8.1.4.3.2

Insert "firefighting" before capacity.

Clause 8.1.5.2

Inclusion of safety standards and minimum requirements around the required safety equipment.

Clause 8.1.5.3

Change "and" to "or".

5.12.1.1: Requirements concerning construction and approval of vehicles	
For all changes proposed:	
Q39.	Do you have any concerns regarding the proposed changes for vehicles?
Yes (Reference 9.0)	
Q40.	If so, please indicate the applicable change and the associated commentary.
<p>The tank and vehicle should be considered as a whole, rather than two separate approvals. Consideration of both vehicle and tank allow the assessment of stability angles, overhangs, distances from vents to ignition sources (brake lights), among other things, which would not be possible when considered separately.</p> <p>WorkSafe WA has not seen any data, reports or statistics that demonstrate that the approval of a dangerous goods vehicle without a tank would provide added safety benefits, particularly where it may create additional administrative burden to both regulators and industry.</p> <p>Further justification is needed as to the inclusion, other than alignment with the ADR. The addition of ADR tanks creates a number of issues which the NTC sought to address as demonstrated by the questions in working paper 8.</p> <p><u>Clause 9.1.1.2 (Definitions)</u></p> <p>The definition of “AN Vehicle” should apply to the whole Code, not just Section 9.</p> <p><u>Clause 9.2.4.1.1</u></p> <p>Referring to 8.1.4.3.3 in this Clause will result compliance issues. It is suggested requirements from 8.1.4.3.3 be copied directly into this section.</p> <p><u>Clause: 9.2.4.1.2</u></p> <p>Referring to 8.1.4.3.3 in this Clause will result in compliance issues. It is suggested requirements from 8.1.4.3.3 be copied directly into this section.</p>	

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.

- Q41. 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?

N/A

- Q42. 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?

N/A

- Q43. 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?

WorkSafe WA supports all the above requirements for diesel transport above 3000 L.

It is also suggested an additional requirement for diesel tankers follow route planning be included (Chapter 8.6).

A diesel tanker incident in a tunnel could lead to a devastating fire that endangers both public safety and infrastructure. Significant diesel tunnel fires could be difficult to extinguish due to high heat retention and the complexity of access within tunnel systems.

A diesel fire can reach temperatures high enough to damage structural tunnel components, leading to costly repairs and potentially rendering the tunnel unusable for extended periods. This could significantly disrupt transport networks, as tunnels often serve as arterial roads.

In light of these risks, ensuring diesel road tankers follow route planning is a necessary precaution that prioritises human safety, protects property, and minimises the potential for a disastrous environmental incident that could have far-reaching consequences.

5.13.2.1: Mixed load EIPs for refined petroleum products	
Q44.	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
Option 1.	
Q45.	Are you aware of any unintended consequences if Option 1 is adopted?
No.	

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:	
Q46.	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?
N/A	
Q47.	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?
N/A	
Q48.	Do you consider applying the high security risk load requirements to all explosives Category 3 loads appropriate?
Yes.	
Additionally, the NTC is seeking data or information on the following:	
Q49.	Do you undertake any transport of Class 1 explosives in tanks? – If yes, please provide information about types and quantities.
No.	
Q50.	Do you undertake any transport of Class 1 explosives in IBCs? – If yes, please provide information about types and quantities.
No.	

15.3.4.1: Transitional provisions for the draft Code	
Q51.	Do you support the NTC introducing more detailed transitional provisions into the Code?
Yes. Detailed transitional provisions reduce compliance uncertainty and will allow carriers time to implement the new requirements of the Code.	
Q52.	Do you have any concerns with the proposed principles for transitional provisions?
No.	

5.13.5.4: Transport categories	
For all questions, please provide any supporting information you have to assist us in finalising these provisions.	
Q53.	After reviewing the draft provisions in 1.1.3.6, please advise:
It is suggested the word “unlimited” be removed from the table in 1.1.3.6.5 and replaced with “Always a small load”.	
Q54.	Should all infectious substances be subjected to a “0” threshold?
No comment.	
Q55.	Are there particular transport scenarios for Category B infectious substances that require a specific concession or exemption?
No comment.	
Q56.	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.	
Q57.	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.
No.	

Q58.	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.
No.	
Q59.	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?
No.	
Q60.	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?
No.	
Q61.	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.
No.	
Q62.	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.
No.	

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.	
Q63.	Do you support different requirements for driver and vehicle licensing?
Yes. It is not appropriate to dangerous goods vehicle licence non-tanker vehicles. It is appropriate to have a dangerous goods driver licence for some of these loads such as portable tanks.	
Q64.	Do you consider that formal training for drivers would be useful in cases where a driver does not need a licence?
Yes. A driver has regulatory responsibilities and needs to be made aware of these obligations.	

Q65.	Do you support the introduction of a notification scheme for vehicles that don't require a licence?
No. This increases the regulatory burden for little or no benefit. What will the jurisdictions do with the notification data?	

6.2.2.4: Change in one-off costs required to comply with the draft Code (suppliers and manufacturers)	
Q66.	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?
N/A	
Q67.	How much will it cost to update your systems to incorporate the proposed changes to the DGL and placarding thresholds?
N/A	
Q68.	How much will it cost to update processes and documentation?
N/A	
Q69.	Are there any one-off costs anticipated for your business?
N/A	

6.2.2.5: Change in ongoing costs required to comply with the draft Code (suppliers and manufacturers)	
Q70.	We are keen to understand the expected benefits and costs of key changes presented in Error! Reference source not found. , and particularly welcome any data or case studies to evidence these impacts.
N/A	

6.3.2.3: Change in one-off costs required to comply with the draft Code (transport industry)	
Q71.	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?
Q72.	How much will it cost to update processes and documentation?
Q73.	How much will it cost your business to update firefighting and emergency equipment to comply with the draft Code?
Q74.	What are the cost savings associated with the changes to the requirement for emergency escape masks?
Q75.	Are there any one-off costs anticipated for your business?
N/A	

6.3.2.4: Change in ongoing costs required to comply with the draft Code (transport industry)	
Q76.	We are keen to understand the expected benefits and costs of key changes presented in Error! Reference source not found. , and particularly welcome any data or case studies to evidence these impacts.
N/A	

6.4: NTC, Regulators and Competent Authorities	
Q77.	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.
Approximately 50 DEMIRS and Main Roads employees.	

6.4.1.2: Reduced complexity and difficulty in administering compliance with the Code	
Q78.	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: <ul style="list-style-type: none"> – 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).

N/A	
Q79.	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)?
WorkSafe WA receives very few requests for determinations, being mostly renewals of an existing determination. As an estimate, one staff day per determination which will vary depending on the technical complexity of the issue the determination is resolving.	

6.4.1.3: Government costs associated with implementing the draft Code	
Q80.	We seek estimated costs from each State & Territory to implement the draft Code, as per the breakdowns provided in the list above.
<p>WorkSafe WA would need to update all State regulations, codes of practice, guidance notes, application forms, inspection forms and procedures, and train staff.</p> <p>It is estimated this would cost between \$500 000 and \$1,000,000.</p> <p>If the NTC does not provide its own app for the new Code, WorkSafe WA would need to significantly modify its Dangerous Goods Decoder App at an estimated cost of \$100 000.</p>	
Q81.	Are there any State or Territory specific impacts that need to be considered? Please provide details.
<p>Yes. Four issues specific to WA:</p> <ol style="list-style-type: none"> 1. WA exclusively licences road tank vehicles. 2. Exemption for mobile processing units (MPUs). 3. Approved emergency responders. 4. Misleading advertisements on a portable tank or a tank vehicle. <p>Further information is available at Dangerous goods safety information sheet - Differences between the WA Dangerous Goods Safety and National MSI</p> <p>And Design approval requirements for bulk containers used to transport solid dangerous goods</p>	

6.5.1.1: Avoided dangerous goods transport incidents due to improved compliance with the draft Code (avoided costs to the community and government)

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| Q82. | We seek any updates on the data set out in this section including data on the: <ul style="list-style-type: none"><li data-bbox="316 383 1027 416">– The number of dangerous goods road and rail incidents.<li data-bbox="316 434 1323 468">– The proportion of incidents involving a fatality, serious injury, minor injury or spill.<li data-bbox="316 486 1010 519">– The costs associated with each type of incident above. |
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Please see [Safety statistics and other reports.](#)