



**Submission – 6 December 2024**

***Draft Code for the Land Transport of Dangerous Goods Consultation Regulatory  
Impact Statement***

In this document the Association for the Battery Recycling Industry (ABRI) sets out industry's feedback on the draft code where there are implications for battery reuse, remanufacturing and recycling. This submission covers feedback for all battery chemistries

Code topic / reference	Comment
Placarding	<p>This is a complex area and ABRI would welcome further discussions with the NTC to clarify the requirements and the practical implications for some of the proposed changes to the Code.</p> <p>Two specific areas of clarity raised by an ABRI member are:</p> <ol style="list-style-type: none"><li>1. The proposed arrangement for Requirements for Emergency Information Panels. This now appears only to require the class diamond (not the specific diamond) placard to be applied to the front and rear of the vehicle when the load exceeds the "small load" definition.</li><li>2. Lithium batteries - Chapter 5.3 suggests that only label No.9 is required for placarding and that No.9A is not used for placarding purposes (5.3.1.1.4). However, in the Draft Code's DG List, the <i>Labels</i> column specifies the label 9A and not 9. Can you please clarify which one applies?</li></ol>
Training	<p>ABRI would welcome further discussions with the NTC on the training requirements. While the intent is that there are no new requirements, the drafting would appear to make it more onerous.</p> <p>Training needs to be flexible to manage the range of battery chemistries especially as technology continues to change. A single used EV battery can be 600V and greater than 500kg and may require different training procedures compared with mixed</p>



	<p>batteries. Used battery energy storage systems may also need specialist handling and training requirements.</p> <p>ABRI would appreciate being part of Commonwealth government consultation on the development of international standards e.g. the ADR.</p>
Self contained breathing apparatus	<p>ABRI supports the proposed changes for lead acid batteries. Safety equipment should be a priority for protecting against inhalation of toxic chemicals, such as lead. ABRI considers the ADR requirement for a filtering escape mask is appropriate for these purposes.</p> <p>ABRI would like to know what directions are being taken through international discussions on protective equipment for lithium batteries.</p>
Fire fighting	<p>ABRI has previously raised with the NTC, that evidence is needed for increasing fire fighting equipment requirements. ABRI supports safe and sustainable transport where costs and benefits can be justified. Fire extinguishers can be used as a first line of defence for cabin, engine and brake fires, that is fires with the vehicle itself.</p> <p>However, managing the load is more complicated and potentially dangerous. ABRI suggests that the Competent Authorities Panel review its <i>Emergency Procedures Guidance – Vehicle Fires</i> to consider if any changes are required with the growing prevalence of lithium batteries. Some fire extinguishers are being trialled overseas and brought into Australia. ABRI is not aware of any fire extinguishers in the Australian market approved for use with lithium-ion battery fires. Procedures for fighting lithium-ion battery fires are still evolving and advice is often not to fight these fires.</p>
Special Provision 598b And P801 for Non Spillable	<p>Special Provision 598b states that some batteries (UN2794, UN 2795, UN2800) do not need to apply DG packaging and transport requirements so long as they meet certain requirements in 598b. ABRI would like to understand the purpose of this special provision.</p> <p>Also, can we clarify that if Non Spillable Batteries (UN2800) don't meet SP598b, i.e. are damaged but have passed SP238b (don't leak when 55 degrees) that the updated packaging instruction</p>



batteries (UN2800)	P801 will not apply. In other words they are still exempt from the code if they have passed SP238b?
Special provision 376	<p>In practice, it is difficult for a customer (sender) to assess whether a battery is damaged or defective such that the battery does not comply with the Manual of Tests and Criteria.</p> <p>Relying on manufacturer safety criteria or a technical expert to make this assessment can lead to delays in transporting batteries to recyclers. The consequence is a substantial increase in risks as batteries are stored at a customer's premises while this assessment is made.</p> <p>A customer needs to be able to undertake a check themselves in line with the criteria in this provision to support timely removal of a damaged/defective battery from a customer's premises and processing by a recycler. Guidelines to assist with this assessment would support timely and safe removal batteries from a customer's premises to the recycler.</p>
Labelling – special provision 376 and 377	Labelling references in the Code should refer to labelling on packaging which may differ from vehicle placarding. That is what diamonds apply.
Large format lithium batteries (e.g. grid scale storage, EV)	<p>Management of large format lithium-ion batteries for reuse, remanufacturing and recycling is an evolving area which lacks clarity. Electrification of industrial fleets and increasing use of energy storage batteries on electricity grids will see substantial increases in these types of batteries over coming years.</p> <p>There is overlap between requirements under the Draft ADG and heavy vehicle rules. A further complication is that the DG transport focuses on new batteries and does not clearly manage handling of batteries at other stages of their life.</p> <p>As part of the work on clean energy transition, ABRI would like to work with the Australian Government to develop clearer rules around the transport for these types of batteries and parts of batteries (e.g. modules vs packs).</p>