

Ms Debra Kirk  
National Transport Commission  
Melbourne

Dear Debra

**Draft Australian Dangerous Goods Transportation Code (ADG) – Consultation Regulatory Impact Statement (CRIS) – APMF submission**

The APMF welcomes the opportunity to provide this submission on the draft ADG and CRIS.

**Removal of SP AU01**

The APMF understands the rationale for the proposed changes to SP AU01 for shipments of environmentally hazardous substances in containers greater than 30 kg/l. We also appreciate that the proposed change would continue to exempt such shipments from placarding, licensing and documentation requirements. We are nevertheless extremely concerned that the full ramifications of changing the designation of these shipments to DGs are not fully understood.

The impact of categorising these shipments as DG in terms of transport operators' insurance and their continued ability to handle these shipments is of particular concern to the APMF. Any reduction in the pool of transport operators available to handle these shipments will negatively affect transport options and increase costs. This is even more relevant for shipments to remote locations, such as those involving water-based paints for large infrastructure projects in remote and regional Australia. Finding transport companies equipped to handle DG shipments in such areas will be challenging and costly.

It should be noted that the proposed change is expected to impact the shipment of finished paints and raw materials shipments to paint manufacturers.

The proposed change will also require out-of-cycle amendments to safety data sheets (SDSs) that currently reference SP AU01. The cost of updating product SDSs is likely to be substantial.

**Recommendation**

- Noting that the proposed changes are designed to improve the labelling of these shipments, retain SP AU01 for shipments of environmentally hazardous substances in containers greater than 30 kg/l; and
- Modify SP AU01 to stipulate UN-compliant labelling as a requirement of eligibility for the exemption under SP AU01 for shipments in containers greater than 30 kg/l.
- Packages up to 30kg/l that satisfy the UN3077 and UN 3082 should remain exempt from labelling.

### **Removal of EIPs from IBCs**

The APMF supports the proposed removal of the EIP requirements for IBCs. The current requirements add unnecessary costs, particularly for imported raw materials transported in IBCs after break bulk. It will also benefit Australian raw material manufacturers, simplifying transport requirements and reducing costs.

Finally, the requirement for EIPs for many IBC shipments will be redundant if environmental hazard labelling is a requirement for eligibility under a modified SP AU01, as recommended above.

#### **Recommendation**

- Remove the requirement for EIPs on IBCs as proposed in the CRIS.

### **Mandatory DG safety advisor role**

Pages 60 and 61 of the CRIS refer to establishing a DG safety advisor role. While the CRIS indicates that this would primarily impact “transporters”, clause 1.8.3 of the draft Code extends to consignors.

Consignors who are SMEs are unlikely to have sufficient resources to establish this role, particularly if DG shipments represent a small proportion of their overall transport requirements. For larger companies, a requirement to appoint a specific staff member to such a role will constrain workforce flexibility.

#### **Recommendation**

- The DG safety advisor role should not be mandatory under the Code. It should remain non-mandatory.

### **Aerosols**

Aerosols should not be treated like gases. The risks are significantly different as aerosols are transported in relatively small packaging.

#### **Recommendation**

- The current arrangements and thresholds applicable to aerosols under the AGD should be retained.

If you have any questions about this submission, please contact me on 0409 111179 or by email at [bernard.lee@apmf.asn.au](mailto:bernard.lee@apmf.asn.au).

Yours sincerely,

A handwritten signature in blue ink, appearing to be 'Bernard Lee', with a stylized, cursive script.

Bernard Lee  
Executive Officer