**Comments on draft ADG Code on behalf of AIDGC**

**1.1.3.1(f) uncleaned empty static storage vessels**

This is quite dangerous.

It would permit the transport of nominally empty (i.e. uncleaned) LPG tanks, flammable liquid storage tanks, including those with freight container structures, and other tanks containing flammable vapour. With hermetically sealed openings (and especially if no relief valve) such tanks involved in an external fire would build up internal pressure and on failure would explode. A tank with pressure relief involved in a traffic accident could end up on its side with the relief device discharging horizontally and, in an external fire, this could cause a jet fire striking first responders, including civilian good Samaritans

Pesticides of Class 6.1 PG II or III are frequently based on a combustible liquid solvent with a flashpoint around 65°C. Such DGs in an external fire will also contain flammable vapour.

The Code must allow for conditions other than “normal” when the potential consequences in a foreseeable accident are serious.

**1.1.3.5 Empty uncleaned packages**

The same consequences as described above apply and the Code must allow for conditions other than “normal” when the potential consequences in a foreseeable accident are serious.

The sentence “Hazards are nullified adequate measures have been taken to nullify all hazards of Classes 1 to 9” is both vague and circular and provides nothing of use to a person involved in transport.

**1.1.3.11 DG for retail sale**

Sub clause (b) does not restrict this exemption to LQ as the “or” permits any size inner packages in the combination packaging as permitted elsewhere in the Code. The thought of the average courier carrying a couple of hundred litres of flammable liquids in his small van (no separation from passenger compartment) with no requirements for anything, including load restraint) conjures many scenarios with serious consequences.

A ”retail customer” not defined in the Code, would mean anybody other than a “wholesale customer” and would include industrial laboratories, pilot plants and others purchasing some quite dangerous goods without any controls, particularly returned goods. This could lead to serious consequences.

**1.1.3.13 Short journeys across public roads.**

(a) Vehicles unloading on a public road are at risk of involvement in traffic accidents, a risk which can be eliminated or controlled inside premises. Unloading pallets or IBCs from the off-side increases this risk. The unloading of tankers would require hoses across footpaths and other public spaces. Any resulting spills will enter drains and/or soak into unpaved ground. As the foreseeable consequences include fires from accidents and environmental contamination, this proposed exemption should not be permitted.

(b) The “immediate vicinity” of premises occupied by the same person is undefined and in rural areas, particularly remote stations, could be interpreted as 20km or more gate to gate on public roads.

In both the above instances, the potential consequences in a foreseeable accident are serious and exemption from the Code should not be permitted