



20 th December 2024

Feedback to:

Review of ADG Code

Introduction

The Truck Industry Council (TIC) is an independent, not-for-profit peak industry organisation representing the united views of truck manufacturers, truck importers, heavy vehicle engine companies and major component suppliers to the Federal Government, State and Territory Governments, Local Government, industry, business associations and the general public.

Membership of TIC is inclusive of all truck manufacturers and importers/distributors in Australia and currently consists of:

- i. 12 truck manufacturers/distributors representing 18 truck brands;
- ii. 4 engine and component suppliers.

TIC members represented 99% of all truck sales above 4.5t GVM in 2023.

In 2024, the truck industry is designing, engineering, testing, developing, and manufacturing trucks at two major locations in Australia without Federal Government assistance. The companies involved, and their locations, are:

- i. Paccar Australia, manufacturing Kenworth and DAF trucks at Bayswater, Victoria; and
- ii. Volvo Group Australia, manufacturing Volvo and Mack brand trucks at Wacol, Queensland.

The two plants combined produce about 40% of all heavy duty trucks sold in Australia (TIC T-Mark Truck Market Sales Data 2023). Complementing these Australian based truck manufacturers are truck importers who deliver the majority of new trucks sold in Australia, importing from Asia, Europe, and the United States of America.

In combination TIC members provide trucks that meet the specific requirements of Australian operators who work in conditions unique to anywhere else in the world ensuring the efficient transportation of the nation's

TIC would like to thank the NTC for the opportunity to provide feedback on the proposed ADG Code draft.

Draft AGG Code

TIC have reviewed the draft ADG Code with particular emphasis on Part 9, covering vehicle requirements.

We note that the draft section:

- Is now more closely aligned with the AS2809 suite of standards
- Has clearer requirements around service and maintenance
- Has clarified the use of vehicles that contain traction batteries, that is , Battery electric (BEV), Fuel Cell Hydrogen (FCEV) and hybrid vehicles (HEV),
 - permitting transport of all Dangerous goods except flammable liquids (FL), Ammonium nitrate (AN) and explosives on vehicles with traction batteries.
 - clarification that battery electric vehicles can transport small quantities of FL goods in drums and ICB's
- Has provided stronger separation between vehicle and tank requirements in the regulation, which clarifies the use of demountable ISO tanks.

Commentary On Vehicles with Traction Batteries

After additional consultation with the NTC, and review of other literature, TIC understand that there are a number of factors that regulators are considering in permitting the use of such vehicles to transport dangerous goods.

The AS2809 suite of standards specifically exclude vehicles that do not have an internal combustion engine. That exclusion was introduced at the last AS review (conducted between 2017 and 2019) and was supported at the time by TIC and other stakeholders. This was done to expedite the review of AS2809 given that many important updates to that standard were overdue. There was also a lack of knowledge that both regulators and industry had at the time of zero emission vehicles being used to transport dangerous goods. The consequence of the exclusion meant that any vehicle that was not covered by AS2809 could not be used to transport any dangerous good at all.

TIC welcomes the relaxation the draft ADG Code proposes, that vehicles with traction batteries can transport all dangerous goods except those mentioned above.

TIC understands that work on regulations that could allow the use of vehicles with traction batteries to transport dangerous goods is on going throughout the world. TIC understands the UN ADR 2025 amendment to start from 1 January 2025, has updated requirements around vehicles with traction batteries, and will permit the use of these vehicle to transport FL goods with commensurate technical requirements.

Transition Arrangements

TIC understands that transition arrangements will be put in place at the time the revised ADG Code is implemented. The arrangement will follow similar arrangements that were put in place in past ADG Code reviews in that:

- Vehicle already approved will continue to be authorised for DG operations
- Vehicles still being manufactured during the transition period to the new ADG Code can still be supplied to market under their initial approval.

TIC see no issues if the same arrangement applied in past ADG Code reviews is applied for this review. Provided clear communication to industry occurs.

Summary

On the whole, regarding the items relevant to our members, TIC do not see any significant issues with this latest review of the ADG Code.

TIC acknowledge that the formulation of regulation around vehicles with traction batteries is evolving throughout the world, and that the NTC will continue to monitor the situation in Europe and consider appropriate reviews of the ADG Code in the future.

TIC would be pleased to offer any assistance that may be required in subsequent reviews of the ADG Code.

Regards



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Truck Industry Council member Brands:

Allison Transmissions Australia
Eaton Transmissions Australia
Cummins Engines
Detroit Engines
DAF Trucks
Dennis Eagle Trucks
Allison Transmissions Australia
Eaton Transmissions Australia
Cummins Engines
Detroit Engines
DAF Trucks
Dennis Eagle Trucks
Foton Mobility Trucks and Vans
Fuso Trucks and Busses

Freightliner Trucks
Hino Trucks
Isuzu Trucks
Iveco Trucks, Busses and Vans
Kenworth Trucks
Mack Trucks
MAN Trucks and Busses
Mercedes-Benz Trucks
Mercedes-Benz Vans
Scania Trucks and Busses
UD Trucks
Volvo Trucks and Busses
Western Star Trucks