
DNAP review of the ADG

Revision 8 of the ADG
Comments to the NTC
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1. Introduction.

The National Transport Committee (NTC) released a discussion paper setting out how they intend to update the Version 8 of the Australian Dangerous Goods Code (ADG.) Since then, have been running through their community and industry consultation process.

This document summarises Dyno Nobel Asia Pacific’s response to this participation process.

2. Executive Summary.

IPL, incorporating DNAP, take our corporate citizenship seriously and we wish to be part of the consultation process. We want to ensure we understand legislative changes that may affect our operations.

As an industry member we want to appropriately influence the process and outcome. We are part of the industry voice, and we want to hear what the rest of our industry has to say and in doing that, share learnings. We want to support the NTC in continuing to safely manage the transport of dangerous goods in Australia.

IPL’s specific interest in commenting on the new, draft ADG, is in the safe transport of Ammonium Nitrate Prill (UN 1942) Ammonium Nitrate Emulsions (UN3375) and Mobile Processing Units (MPUs) so we have confined our comments to these areas.

IPL welcome the opportunity to be part of the industry & community consultation process and representatives of IPL will continue to participate in all forums associated with the consultation process. We thank the NTC for this opportunity.

We will comment separately on the AEC.

3. Scope

DNAP comments in this document are confined to the safe transport of ANE (UN 3375) AN prill (UN 1942) and to MPUs.

We will comment separately on the AEC.

4. Comments to NTC

DNAP's comments are contained in the summary table in section 5 of this document. Where appropriate, these are listed by clause number.

5. Summary of Review.

Clause Ref	ADG Ref	Item in the new code	DNAP proposed position
	1.10.3.2.3.1	(a) (i)	Recommend that "locks OR security seals." DNAP habitually uses security seals.
5.11	Part 8 8.1.4	Permits substitution of extinguishing agent in the load area. Foam or water may be a more appropriate choice of extinguishing agent where the expected use of the extinguisher is to combat a wheel or tyre fire. AS 1850 may also be consulted for additional information on selection of extinguishing agent. Specifies fire-fighting equipment that must be carried. Requirements have been simplified, are based on the size of the transport unit, and include clearer provisions relating to equipment substitution.	DNAP recommends foam fire extinguishers for the substitution on vehicles covered by this report. This is consistent with the current AEISG code for MPUs.
5.13.6.4.		Licensing of MPUs and MPU drivers.	DNAP supports any initiative to harmonise licensing and recognition across States.
	9.2.3.2	Engine – Electric power trains shall not be used for FL or AN vehicles	DNAP recommends that this clause does NOT apply to MPUs. Battery-power is likely to become relevant to the mining industry and lowering diesel usage over time will become more important.
	9.2.4.2	Tyre monitoring has been added	DNAP is supportive of this new initiative as written.
		Steel mud-guards	Recommend "metal or non-flammable" mudguards. (Not plastic or rubber.)
	Chapter 4.7		Because of the specialised nature of MPUs, DNAP recommends that the AEISG CoP is given status in the new ADG – thereby ensuring the two documents do not compete.
		Placarding of MPUs	Call up the AEISG code for MPUs.
5.7.3		The new code states: MPUs are currently self-regulated under an Industry Code of Practice (CoP). Some States and Territories have given legal effect to the	The AEISG CoP is intended to be complementary to legislative documents such as the ADG.

		<p>CoP via their respective legislation, but this is not the case everywhere.</p> <p>The draft Code will directly incorporate these requirements. New provisions will not create significant new obligations on transporters but clarify the application of the Code to these situations. For MPUs, for example, the Code will continue to refer to the MPU CoP.</p> <p>Including these requirements in the Code will:</p> <ul style="list-style-type: none"> • Increase transparency for users of these vehicles. 74 Draft Code for the land transport of dangerous goods September 2024 • Ensure the ongoing maintenance of these provisions. • Make it easier for regulators to assess compliance and undertake enforcement. 	<p>Specifically, venting as defined in AS2809</p>
5.1.2		Part 9 - Requirements concerning construction and approval of vehicles	
	9.8.8	Locks on all compartments.	Recommend that “locks OR security seals.” DNAP habitually uses security seals.
		Unresolved issues relating to explosives of Class 1 are discussed in Section 5.13.	Not in the scope of this DNAP report. Comments will be provided separately.
5.13.3		Incorporation of Class 1 explosives into the Code	