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| **Title** |  Draft Code for the land transport of dangerous goods – Attachment D: Draft Code under Option 4  |
| **Reason for Review** | Draft Code released for public comment with the Consultation Regulatory Impact Statement (C-RIS) |

In addition to providing feedback to our C-RIS during public consultation, you may like to notify us to any material or drafting issues identified in the draft Code. To do so, please complete this form, and email it back to us at ADGcode@ntc.gov.au.

Feedback is requested by Tuesday 10 December 2024.

**Details of person submitting comments**

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| If you are submitting comments on behalf of an association or organisation, please provide the following details. |
| **Organisation name:** | Dangerous Goods Services |

**Comments**

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| General Comments (e.g. layout, information flow, readability, size, etc. of overall document)  |
| Issue | Suggested change |
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| Specific Comments (Comments on specific information – please provide sufficient details to enable identification of the specific content that your comments relate to.) |
| Part 1: General provisions |
| Chapter | Provision No. | Overview of issue | Suggested change |
| 1.1 | 1.1.3.6.5 | UN3459 | UN**3459** (which is 6.1), should this be UN**3549** instead? |
|  | 1.1.3.6.6 | Incorrect referencing | “All relevant provisions of this Code not listed in **1.1.3.6.5 (a)** continue to apply.”Shouldn’t this say **1.1.3.6.6.(a)**? |
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| Specific Comments (Comments on specific information – please provide sufficient details to enable identification of the specific content that your comments relate to.) |
| Part 2: Classification |
| Chapter | Provision No. | Overview of issue | Suggested change |
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| Specific Comments (Comments on specific information – please provide sufficient details to enable identification of the specific content that your comments relate to.) |
| Part 3: Dangerous goods list, special provisions and exemptions related to limited and excepted quantities |
| Chapter | Provision No. | Overview of issue | Suggested change |
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| Specific Comments (Comments on specific information – please provide sufficient details to enable identification of the specific content that your comments relate to.) |
| Part 4: Packing and tank provisions |
| Chapter | Provision No. | Overview of issue | Suggested change |
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| Specific Comments (Comments on specific information – please provide sufficient details to enable identification of the specific content that your comments relate to.) |
| Part 5: Consignment procedures |
| Chapter | Provision No. | Overview of issue | Suggested change |
| 5.1 | 5.1.4 and 7.5.2 | 7.5.2 replaces the current 9.1, thus providing incompatibility guidance for the application of 5.1.4, but this is not clear enough for the packers understanding. | Amend 5.1.4 to also reference to the application and use of 7.5.2 compatibility guidance |
| 5.3 | 5.3.2 | Reference to Figures that are out of place. | 5.3.2.1.2 refers to Figure 5.3.2.2.3 (a), two pages over. This makes it hard for some learners to follow along.Surely this Figure could be positioned closer to, or duplicated nearer to 5.3.2.1.2 and 5.3.2.1.4?This is an issue carried over from edition 7. |
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| Specific Comments (Comments on specific information – please provide sufficient details to enable identification of the specific content that your comments relate to.) |
| Part 6: Requirements for the construction and testing of packagings, intermediate bulk containers (IBCs), large packagings, tanks and bulk containers and segregation devices |
| Chapter | Provision No. | Overview of issue | Suggested change |
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| Specific Comments (Comments on specific information – please provide sufficient details to enable identification of the specific content that your comments relate to.) |
| Part 7: Provisions concerning the conditions of carriage, loading, unloading and handling |
| Chapter | Provision No. | Overview of issue | Suggested change |
| 7.5 | 7.5.2 | Changes to what was table 9.2, now within 7.5.2  | When talking about strong acids and alkalis, it no longer mentions the wording “**concentrated**”.The wording concentrated has previously helped me explain to students that this defines the issue to be with DG classified acids and alkalis, and not those that are not concentrated enough to meet the classification requirements of SP223, now delt with in part 2 – classification with no SP reference required.Could this wording “concentrated” be reapplied? |
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| Specific Comments (Comments on specific information – please provide sufficient details to enable identification of the specific content that your comments relate to.) |
| Part 8: Requirements for vehicle crews, equipment, operation and documentation |
| Chapter | Provision No. | Overview of issue | Suggested change |
| 8.1 | 8.1.6.1 | Current code allows for the holder to be placed on **a door** of the cabin in 11.2.2.1 (a) and (b).The new code only allows for the **driver’s door** in 8.1.6.1 (a) and (b) | It can be very inconvenient for it to be specifically on the driver’s door, for a number of reasons.Can this be changed to reflect the current requirement? |
|  | 8.1.6.2 | Reference to the words “emergency procedure guides” or “emergency information” in red letters at least 10 millimetres high on a white background. | Can this be extended to outline the requirements of the notice affixed to the inside of the driver’s door of the cabin, when the EIH is located elsewhere in the cabin (8.1.6.1 (c))?I have had questions from transport companies regarding this. |
| 8.2 | 8.2.2.4.4 (b) | Learning materials consisting of student handbooks, guides or workbooks, but 8.2.2.7.4.1 states closed book, in line with the new CAP MAI requirements. | It is pointless for us trainers to produce and provide student handbooks, guides or workbooks when the assessment requirements are closed book, requiring the students to find it in the legislation directly anyway.On the subject of the students creating their own individual notes - they are not generally accustomed to appropriate note taking practices within a classroom environment, and get lost in writing down either too much or not enough information in a poorly constructed manner.Either way, this slows down the class and learning process, through either chewing up delivery time when they are trying to write down too much, or assessment time because they haven’t written down enough guidance for themselves.This in turn reduces the amount of information I am able to get access to them in the timeframe of the course.The closed book requirement does not work well in practice, and has caused many frustrations due to the complexity of the information that they are trying to comprehend.That is why student handbooks, guides or workbooks were helpful for translation and comprehension. |
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| Specific Comments (Comments on specific information – please provide sufficient details to enable identification of the specific content that your comments relate to.) |
| Part 9: Requirements concerning the construction and approval of vehicles |
| Chapter | Provision No. | Overview of issue | Suggested change |
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