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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](mailto:ADGcode@ntc.gov.au).

Feedback is requested by Tuesday 10 December 2024.

**Details of person submitting comments**

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| --- | --- | --- | --- | --- |
| **Name:** | Todd Brewer | | | |
| **Email:** | todd.brewer@pilbaraports.com.au | | **Mobile** (optional): | 0428 323 505 |
| If you are submitting comments on behalf of an association or organisation, please provide the following details. | | | | |
| **Organisation name:** | | Pilbara Ports | | |

**Comments**

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| General Comments (e.g. layout, information flow, readability, size, etc. of overall document) | |
| Issue | Suggested change |
| Question 12 in the Consultation Regulatory Impact statement.  The draft code does not seem to address when Dangerous Goods within breakbulk or containers are held for biosecurity inspection. The requirement to remove from port within certain timeframes is not achievable under AS3846.  For example, lithium-Ion batteries need to be removed within 5 days. If during a weekend or a breakbulk, or large quantities of containers are involved, Biosecurity do not have the resources to remove from site within the 5-day timeframe.  As a rural destination all containers, including reefers, require a biosecurity inspection. It is impossible to conduct a biosecurity inspection and remove reefer containers from site within the required 12-hour removal timeframe particularly if multiple reefers are required to undergo inspection.  As a rural destination, the DG dwell times in port severely restrict what can be imported into Port Hedland. | Account for Dangerous Goods that are held for biosecurity requirements, notably within a regional port. |
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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 |
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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 | | | |
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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 | | | |
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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 | | | |
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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 | | | |
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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 | | | |
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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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