This form has been provided to assist stakeholder in making a submission on the Supplementary Consultation Paper – Provisions for the transport of explosives in the ADG Code).

Submissions close on Tuesday 17 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:** | Queensland Rail |

Consultation paper questions. Please enter your comments in the row below each question.

***Note:*** *you are not required to answer every question.*

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| **2.1. Code Part 1 – General**  |
| **Q1:** Which of the following options do you support for the definition of low hazard explosives? Please provide your reasoning.Option 1: Only low hazard explosives meeting the description suggested by the Explosives Working Group (as per the table), orOption 2: Continuing the AEC approach of concessions only for explosives of classification code 1.4S. |
| Option 1: Only low hazard explosives meeting the description suggested by the Explosives Working Group (as per the table): There are more than just one class of explosives that meet this criterion and are a low risk when transported and used, as these also including those sold by retailers to general public not requiring a licence to purchase.  |
| **Q2:** Should the table of low hazard explosives in the ADG Code include UN numbers in addition to the classification code and product description? Please provide your reasoning. |
| Yes, these are still required to be referenced in transport documentation and including and separation/segregation and other packaging or transport requirements to ensure safe handling and transport are clearly defined. |
| **Q3:** Are there any entries (UN numbers, DG list entries or product descriptions) that:1. Are listed in the table above that should not be considered low hazard explosives, or
2. Are not listed in the table above that should be considered low hazard explosives?

Please provide your reasoning. |
| The listed table appears correct with known explosives that meet the criteria. |
| **Q4:** Do you consider that the limits provided in the draft (in 1.1.3.14.3) are appropriate? Please provide your reasoning. |
| The set limits to permit the transport of low hazard explosives are agreed with. |
| **Q5:** Do you consider the conditions set out for transport of low hazard explosives and other dangerous goods are appropriate? Please provide your reasoning. |
| The provisions and conditions for the use of freight containers for the transport of explosives is correct and appropriate in managing the low risk. |
| **Q6:** Are there other import or export scenarios that you consider require conditional concessions to prevent unnecessary intermodal barriers? Please:1. outline the scenarios where this occurs; and
2. appropriate controls to manage it.

Please provide your reasoning. |
| Queensland Rail does not import or export dangerous goods, therefore no response to this scenario will be provided. |
| **Q7:** After reviewing the draft provisions for Chapter 1.1, do you have any comments, concerns or suggested amendments? Please provide details. |
| The draft for chapter 1.1 is agreed with. |
| **Q8:** After reviewing the draft duties intended for Chapter 1.4, do you have any comments, concerns, or suggested amendments? Please provide details. |
| The draft duties included in chapter 1.4 are agreed with and no further information is required. |
| **Q9:** What do you consider to be an appropriate level of insurance for incidents involving the transport of explosives? Please provide your reasoning. |
| There are many scenarios that can change as to what is an acceptable level of insurance, based on the quantity of specified dangerous goods to where the incident occurs i.e. built-up area versus an open area, therefore as a base line the amounts specified are a minimum with transporters identifying their risk and increasing where appropriate. |
| **Q10:** After reviewing the draft administrative controls for drivers in 1.8.11, do you have any comments, concerns, or suggested amendments? Please provide details. |
| The draft controls listed in 1.8.1.1 are agreed with. |
| **Q11:** Do you support the proposal to treat all explosives other than low hazard explosives as high consequence dangerous goods for transport? Please provide your reasoning. |
| Explosives other than those classed as low hazard explosives are recommended to be classified as high consequence as they can contribute to a terrorist misuse. |
| **Q12:** After reviewing the draft provisions for Chapter 1.10, do you have any comments, concerns, or suggested amendments? Please provide details. |
| There are no further comments to be added, the draft provisions appear adequate for known dangerous goods. |

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| **2.3. Code Part 3 – DG list and special provisions** |
| **Q13:** Is there a reason why special provision 616 and the exudation test in 2.3.1 should not be included? Please provide your reasoning. |
| Queensland Rail (QR) are not in a position to correctly answer or comment on this question as this explosive is not used by QR or transported by rail in Queensland |
| **Q14:** Is there a reason why the LQ values for class 1 should not be included in the DG list? Please provide your reasoning. |
| LQ values pertaining to dangerous goods and specific explosives should be included as this will enable all reference criteria and information pertaining to the transport of the LQ explosives to be listed in the one document. |
| **Q15:** If you currently import or export articles of UN 0012, UN 0014 or UN 0055 please provide details of any anticipated costs savings from the proposed LQ provisions. |
| Queensland Rail (QR) are not in a position to correctly answer or comment on this question as this explosive is imported or exported by QR. |
| **Q16:** Do you support the removal of tank instructions for the transport of class 1 substances? Please provide your reasoning. |
| If there are no known explosives of class 1 that are transported by tanks, then this section can be removed. |
| **Q17:** Do you have any comments, concerns or suggested amendments relating to Part 3 of the draft ADG Code? Please provide details. |
| Queensland Rail supports the inclusion of additional reference columns in part 3 to ensure referenced information is easily known and identified at the one point of lookup to reduce the risk of incorrect safe transport of DG. |

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| **2.4. Code Part 4 – Packaging and tanks** |
| **Q18:** After reviewing the draft provisions for Chapter 4.1, do you have any comments, concerns or suggested amendments? Please provide details. |
| Queensland Rail agrees with the inclusion of Special packing provisions for goods of Class 1 included in chapter 4.1 and the content. |

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| **2.5. Code Part 5 – Consignment procedures** |
| **Q19:** Is there a reason why the markings on inner packagings should not refer to the GHS requirements? Please provide your reasoning. |
| The requirements of the AEC marking and labelling need to be transferred to the ADGC as these are now a common practice and identification of inner packages and articles is based on these labelling’s being in place.,  |
| **Q20:** Is it necessary to retain the provisions relating to marking and labelling on articles and wrappings in the ADG Code? Please provide your reasoning. |
| The requirements to retain the provisions of marking and labelling for explosives in the ADGC as this continues to ensure that all referenced material and content is retained in the one code (Book) and reduces the risk of having additional resources to look up pertaining to the transport of DG/explosives. |
| **Q21:** After reviewing the draft provisions for Chapter 5.2, do you have any comments, concerns or suggested amendments? Please provide details. |
| IBC’s regardless of the class of DG should have EIPs located on the sides of the IBC, IBC,s may be carried on open vehicles or when stored has the hazard identification as a standard requirement across all the IBCs |
| **Q22:** After reviewing the draft provisions for Chapter 5.3, do you have any comments, concerns or suggested amendments? Please provide details. |
| Queensland Rail agrees with the draft recommendations regarding vehicle placard and marking as per the draft ADG Code. |
| **Q23:** Which of the following options do you consider the ADG Code should follow:Option 1: Permit placarding of MPUs with EIPs as set out in the MPU Code (see above).Option 2: Require that MPUs are placarded with the appropriate EIPs for the dangerous goods being transported.Please provide your reasoning. |
| Option 2 is the preferred option to maintain uniformity with the ADG Code and the hazard is still described and identified being aligned to the ADG Code. |
| **Q24:** After reviewing the draft provisions for Chapter 5.4, do you have any comments, concerns or suggested amendments? Please provide details. |
| Queensland Rail agrees with the draft recommendations regarding chapter 5.4 and retaining class 1 provisions in the draft ADG Code. |

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| **2.6. Code Part 6 – Containment systems** |
| **Q25:** After reviewing the draft provisions for Chapter 6.16, do you have any comments, concerns or suggested amendments? Please provide details. |
| Queensland Rail agrees with the draft recommendations regarding explosives load compartments and recommended changes in the draft ADG Code. |

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| **2.7. Code Part 7 – Loading, unloading and handling** |
| **Q26:** After reviewing the draft provisions for Chapter 7.2, do you have any comments, concerns or suggested amendments? Please provide details. |
| Queensland Rail agrees with the draft recommendations regarding chapter 7.2 Loading, unloading and handling and recommended changes in the draft ADG Code. |
| **Q27:** Do you consider that special provisions V3 and V12 need to be retained? Please provide your reasoning. |
| Queensland Rail (QR) are not in a position to correctly answer or comment on this question as this explosive commodity and IBC loading has not been previously managed, transported or handled by QR. |
| **Q28:** Are there reasons why section 7.5.5.2.3 should not be deleted, allowing explosives to be transported on MPUs? Please explain your reasoning. |
| Queensland Rail agrees with the draft recommendations regarding 7.5.5.2.3 transporting of explosives on MPUs and recommended deletion changes in the draft ADG Code. |
| **Q29:** After reviewing the draft provisions for Chapter 7.5, do you have any comments, concerns or suggested amendments? Please provide details. |
| Queensland Rail agrees with the draft recommendations regarding chapter 7.5 in retaining the CV codes in the draft ADG Code. |

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| **2.8. Code Part 8 – Vehicle crews and operations** |
| **Q30:** Do you oppose the inclusion of a requirement to carry a 2 kg extinguisher for explosives category 1 loads? Please explain your reasoning. |
| Queensland Rail agrees with the draft recommendations regarding part 8 and the retaining of a 2 kg fire extinguisher in the draft ADG Code. This minimum requirement is already in place for DG transport and aligning to this code ensures any vehicle is capable of transporting a variety of DG classes without changing fire extinguishers. |
| **Q31:** After reviewing the draft provisions for Chapter 8.1, do you have any comments, concerns or suggested amendments? Please provide details. |
| Queensland Rail agrees with the draft recommendations regarding chapter 8.1 and the driver remaining at the vehicle for a limited time to reduce the risk of delayed tyre and brake fires, past incidents have supported this change.  |
| **Q32:** After reviewing the draft provisions for Chapter 8.4, do you have any comments, concerns or suggested amendments? Please provide details. |
| Queensland Rail agrees with the draft recommendations regarding chapter 8.4 and the driver remaining at the vehicle for a category 2 and 3 loads only. |
| **Q33:** After reviewing the draft provisions for Chapter 8.5, do you have any comments, concerns or suggested amendments? Please provide details. |
| Queensland Rail agrees with the draft recommendations regarding chapter 8.5 in the draft ADG code. |
| **Q34:** Do you consider that the journey planning requirements should be placed in Chapter 8.6 or somewhere else? Please provide details. |
| Queensland Rail agrees with the draft recommendations regarding chapter 8.6 and inclusion of the journey planning for class 1 in the draft ADG code. |
| **Q35:** After reviewing the draft provisions for Chapter 8.6, do you have any comments, concerns or suggested amendments? Please provide details. |
| Queensland Rail has no additional comments regarding journey planning in chapter 8.6 in the draft ADG code. |

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| **2.9. Code Part 9 – Vehicles** |
| **Q36:** After reviewing the draft provisions for Chapter 9.1, do you have any comments, concerns or suggested amendments? Please provide details. |
| Queensland Rail has no additional comments regarding vehicle dossier and other changes in chapter 9.1 in the draft ADG code. |
| **Q37:** Do you support the provision to mandate a fixed fire-fighting system for EX3 vehicles in the new ADG Code? Please explain your reasoning. |
| Queensland Rail (QR) are not in a position to correctly answer or comment on this question as class 1 explosives are not transported or handled by QR. |
| **Q38:** After reviewing the draft provisions for Chapter 9.3, do you have any comments, concerns or suggested amendments? Please provide details. |
| Queensland Rail (QR) are not in a position to correctly answer or comment on this question as class 1 explosives and requirements of chapter 9.3 are not transported or handled by QR. |
| **Q39:** Do you support mandating the AEISG MPU Code in the new ADG Code for design and construction of MPUs? Please provide your reasoning. |
| Queensland Rail (QR) are not in a position to correctly answer or comment on this question as MPU’s are not transported or handled by QR. |
| **Q40:** After reviewing the draft provisions for Chapter 9.8, do you have any comments, concerns or suggested amendments? Please provide details. |
| Queensland Rail (QR) are not in a position to correctly answer or comment on this question as MPU’s are not transported or handled by QR. |

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| **3.1. Commonwealth explosives and legislation** |
| **Q41:** Please advise if you consider that these exemptions for commonwealth explosives should be included in the ADG Code? Please explain your reasoning. |
| Queensland Rail agrees with the draft recommendation that permanent exemptions across all states are placed in the ADG Code, where as other exemptions specific to a state are not maintained in the ADG code. |

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| **3.2. Rail transport of explosives of class 1** |
| **Q42:** If provisions are required for rail transport, then the NTC will look to run a small consultation group with affected stakeholders so the important, rail-specific provisions can be analysed, updated and included in the draft code. We may need to consider removing these provisions if insufficient information is available to update them.If you transport class 1 explosives by rail, please provide the following information:1. Typical quantities and types of class 1 explosives transported by rail;
2. The locations where this occurs, and the frequency of this transport;
3. If you are willing to be part of a consultation group to assist with updating the rail-specific provisions in the AEC.
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| Queensland Rail (QR) are not in a position to correctly answer or comment on this question as class 1 explosives are not transported or handled by QR. |