



203-426-4358  
SAAMI.ORG

National Transport Commission  
Level 3, 600 Bourke Street  
Melbourne, VIC 3000, Australia

Re: Provisions for the Transport of Explosives in the ADG Code Supplementary Consultation Paper: Class 1 Explosives Consultation

Dear Sir or Madam,

The Sporting Arms and Ammunition Manufacturers' Institute (SAAMI) is an association of the United States's leading manufacturers of firearms, ammunition, and components. SAAMI was founded in 1926 at the request of the US government to create and publish industry standards for safety, interchangeability, reliability, and quality; coordinate technical data; and promote safe and responsible firearm use. In addition, SAAMI is the preeminent global resource for the safe and responsible manufacturing, transportation, and storage of firearms, ammunition, and components. SAAMI is a Non-Governmental Organization (NGO) at the United Nations and are members of the United Nations Sub-Committees of Experts on the Transport of Dangerous Goods and Global Harmonization of Hazard Classification and Labeling Systems. Technical excellence is always SAAMI's goal and safety is always the prerequisite.

We would like to thank the National Transport Commission for the opportunity to provide comments on Provisions for the Transport of Explosives in the ADG Code Supplementary Consultation Paper. Our comments are provided via the attached Questions Form. We are happy to provide additional information should you require it.

Thank you for your consideration of this comment letter. If you have any questions or concerns, please feel free to contact me at [bosowiecki@saami.org](mailto:bosowiecki@saami.org) or 203-426-4358 x284.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Osowiecki".

Brian Osowiecki  
Director, Regulatory Affairs

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

<b>Name:</b>	Brian Osowiecki		
<b>Email:</b>	bosowiecki@saami.org	<b>Mobile (optional):</b>	+1-203-426-4358 x284
If you are submitting comments on behalf of an association or organisation, please provide the following details.			
<b>Organisation name:</b>	SAAMI (Sporting Arms & Ammunition Manufacturers’ Institute, Inc.)		

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

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

<b>2.1. Code Part 1 – General</b>
<p><b>Q1:</b> Which of the following options do you support for the definition of low hazard explosives? Please provide your reasoning.</p> <p>Option 1: Only low hazard explosives meeting the description suggested by the Explosives Working Group (as per the table), or</p> <p>Option 2: Continuing the AEC approach of concessions only for explosives of classification code 1.4S.</p> <p>SAAMI supports Option 1 allowing concessions which are essential for explosives used by the public or for facilitating the use of normal distribution channels. Otherwise, application of the requirements for the shipment of high hazard explosives to medium hazard explosives are so burdensome and costly as to prevent small shipments and widespread distribution.</p> <p>We suggest renaming the group from “low hazard explosives” to something else. The UN GHS has recently defined 1.4S to be low hazard, 1.4 as medium hazard, and all other explosives as high hazard, therefore the naming of 1.4 explosives as “low hazard” is technically incorrect. The UN defines Division 1.4 as “no significant hazard” compared to Divisions 1.1, 1.2 and 1.3 (medium hazard). The UN has criteria for 1.4S which are measurably less than 1.4, and the UN GHS defines this as low hazard.</p>
<p><b>Q2:</b> 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.</p>

UN numbers are not necessary if the group is defined based on the explosive division or the compatibility group. The classification is the deciding factor, which is based on testing and quantitative criteria. The listing of UN numbers is unhelpful when it subjectively detracts from the importance of the classification, i.e., the classification is sufficient without other details. Listing UN numbers is a use-based approach instead of a hazard-based approach. Use-based approaches are inefficient, subjective, inconsistent and generally not the best way to write regulations. It also would be better not to include UN numbers so that there is less work or doubt when new UN numbers are added in the future.

For example, what is the basis for excluding UN 0501, a 1.4C explosive? This includes propellants used by the public in antique firearms. Perhaps the basis is that no one mentioned it? What about other constituencies that come forward with other UN numbers later? Why not avoid the inefficient promulgation of regulations and eliminate UN numbers in this context? The hazard classification reliably provides safety.

Another example, what is the basis for excluding UN 0055, Cases, cartridges, empty with primer? This is one of the safest 1.4S explosives.

**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 listing of only certain UN numbers is unhelpful. All 1.4S explosives should be included.

Classifications 1.4C and 1.4G include explosives that are routinely used by the public and are therefore appropriate to be included for facilitation. These classifications each have the same safety criteria, e.g., maximum 4 meter radius flame ball and maximum 20J projectile. The UN numbers inside these divisions are tested to comply with those criteria.

We suggest expanding the current-proposed-low-hazard group to cover all Division 1.4 (medium hazard) explosives, as these explosives are defined to preclude mass explosion and predominantly lethal effects. Otherwise, application of the requirements for the shipment of high hazard explosives to medium hazard explosives are so burdensome and costly as to prevent small shipments and widespread distribution. Should this suggestion not be adopted, adding 1.4C and 1.4G is better than doing nothing.

If our suggestions to include all 1.4 explosives, or at least all 1.4C, 1.4G and 1.4S, explosives are not accepted, then the following UN numbers should be added: UN 0055, UN 0338, UN 0339 and UN 0501.

**Q4:** Do you consider that the limits provided in the draft (in 1.1.3.14.3) are appropriate? Please provide your reasoning.

<p>A quantity of 500 kg would be more realistic in terms of the average size of shipments. This value is normal in other jurisdictions, such as Canada. It must be born in mind that the consequences of being over the threshold preclude the use of normal transport options. Only specialist carriers can comply with the full requirements, and the associated infrastructure and costs eliminate the possibility of making small shipments. This drives the quantities of shipments up to 1,000's of kgs, adding risk to transport and reducing options and flexibility for commerce.</p>
<p><b>Q5:</b> Do you consider the conditions set out for transport of low hazard explosives and other dangerous goods are appropriate? Please provide your reasoning.</p>
<p>Yes, they are appropriate. This avoids unusually high insurance; security plans and provisions; and specialized vehicles.</p>
<p><b>Q6:</b> Are there other import or export scenarios that you consider require conditional concessions to prevent unnecessary intermodal barriers? Please:</p> <ol style="list-style-type: none"> <li>1. outline the scenarios where this occurs; and</li> <li>2. appropriate controls to manage it.</li> </ol> <p>Please provide your reasoning.</p>
<p>The expansion to include all 1.4 explosives would be helpful, versus requiring differing approaches based on UN numbers. This division-based approach would align with the regulations of the International Civil Aviation Organization and the International Maritime Organization.</p> <p>The acceptance and handling of 1.4S explosives should be facilitated at ports, see IMO guidance.</p>
<p><b>Q7:</b> After reviewing the draft provisions for Chapter 1.1, do you have any comments, concerns or suggested amendments? Please provide details.</p>
<p>V2 should not be applied for Division 1.4 explosives. Requirements for the use of EX vehicles is burdensome for products which are classified as “no significant hazard” (compared to 1.1, 1.2 and 1.3 explosives).</p>
<p><b>Q8:</b> After reviewing the draft duties intended for Chapter 1.4, do you have any comments, concerns, or suggested amendments? Please provide details.</p>
<p><b>Q9:</b> What do you consider to be an appropriate level of insurance for incidents involving the transport of explosives? Please provide your reasoning.</p>
<p>A \$5 million minimum for high hazard explosives (all explosives other than Division 1.4); A \$1 million minimum for medium hazard explosives (Division 1.4). We see these values in the USA and they seem to be working. A \$5 million policy can be difficult to obtain but seems to be appropriate for high hazard explosives.</p>
<p><b>Q10:</b> After reviewing the draft administrative controls for drivers in 1.8.11, do you have any comments, concerns, or suggested amendments? Please provide details.</p>

**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.

We suggest a tweak to the approach for Division 1.4.

Unlike for safety, the use of UN numbers can be appropriate for security. The United Nations Model Regulations limit high consequence dangerous goods of Division 1.4 to UN Nos. 0104, 0237, 0255, 0267, 0289, 0361, 0365, 0366, 0440, 0441, 0455, 0456, 0500, 0512 and 0513. We support this approach.

**Q12:** After reviewing the draft provisions for Chapter 1.10, do you have any comments, concerns, or suggested amendments? Please provide details.

**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.

**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 should be included.

The LQ system was developed at the UN. The UN Guiding Principles document states: "The rationale behind limited quantity provisions is that selected dangerous goods packed in small quantities and in good, robust packaging pose a lesser risk in transport than do the same goods packed in larger volumes, and on this basis some relief from the requirements may be accepted."

LQ is currently applied to UN 0012, UN 0014 and UN 0055. Various jurisdictions have expanded LQ in Class 1 to other commodities. The system was "future proofed" before implementation by noting the following recommended limitations for explosives designated as LQ:

- *classification as 1.4S is a prerequisite;*
- *must not propagate independent of packaging;*
- *may not include entries on the high consequence list;*
- *may not include generic entries or n.o.s. entries, e.g., no general fireworks 1.4S entry;*
- *must present no hazardous effects outside the package in the event of accidental initiation (as determined by use of the 6(d) test).*

The IMDG code has been harmonized with the UN so that LQ explosives are incorporated. For maritime transport, designation as LQ reduces segregation, and per SOLAS, specialized storage requirements in each ship's Document of Compliance are waived. LQ may be utilized for facilitation in port regulations. The European regulations incorporate LQ, and the ICAO regulations allow for LQ marks on packages.

Approximately 15 billion cartridges are manufactured per year and marked and shipped as LQ. Commerce is impeded when shipments are not designated as LQ, as LQ is so important for markets where LQ is recognized that massive efforts are required for rebuilding of pallets and package remarking. At a minimum, failure to adhere to international norms will impede Australian imports.

Small arms ammunition is safe in transport. It does not shoot at high velocity from its packaging. Because of its design, small arms ammunition does not mass explode or propagate from one cartridge to the next, irrespective of packaging. It is safer than many dangerous goods, including other goods used by the public. For domestic transport in Australia, no package testing should be required, other than a capability requirement to pass the 6d test. No dangerous goods documentation should be required for ground transport. No other limitations should be placed on ground shipments.

**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.

**Q16:** Do you support the removal of tank instructions for the transport of class 1 substances? Please provide your reasoning.

**Q17:** Do you have any comments, concerns or suggested amendments relating to Part 3 of the draft ADG Code? Please provide details.

#### **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.

#### **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.

Marking in alignment with the GHS is a good way forward. Avoiding inconsistencies will facilitate efficiency for global distribution.

**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.

Transport regulations should not require hazard communication on inner packagings. Security regulations may have such requirements.

**Q21:** After reviewing the draft provisions for Chapter 5.2, do you have any comments, concerns or suggested amendments? Please provide details.

The ADG code should follow the provisions for the limited quantities (LQ) system, e.g., in 5.2.1.5.1. No UN number, proper shipping name or hazard label is required in international regulations.

**Q22:** After reviewing the draft provisions for Chapter 5.3, do you have any comments, concerns or suggested amendments? Please provide details.

No placarding should be required for Limited Quantities (LQ).

**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.

**Q24:** After reviewing the draft provisions for Chapter 5.4, do you have any comments, concerns or suggested amendments? Please provide details.

No safety documentation should be required for Limited Quantities (LQ) shipments by ground.

<b>2.6. Code Part 6 – Containment systems</b>
<b>Q25:</b> After reviewing the draft provisions for Chapter 6.16, do you have any comments, concerns or suggested amendments? Please provide details.
Division 1.4 explosives are defined as having no significant explosive hazard, and should only be subject to general requirements for dangerous goods shipments. No special approaches for explosives are warranted. Special approaches unnecessarily impede commerce.

<b>2.7. Code Part 7 – Loading, unloading and handling</b>
<b>Q26:</b> After reviewing the draft provisions for Chapter 7.2, do you have any comments, concerns or suggested amendments? Please provide details.
<b>Q27:</b> Do you consider that special provisions V3 and V12 need to be retained? Please provide your reasoning.
Special provision V3 generally should not apply to Division 1.4 explosives of high quality in compliant packaging. Certain provisions may be made for fireworks as desired.
<b>Q28:</b> 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.
<b>Q29:</b> After reviewing the draft provisions for Chapter 7.5, do you have any comments, concerns or suggested amendments? Please provide details.

<b>2.8. Code Part 8 – Vehicle crews and operations</b>
<b>Q30:</b> Do you oppose the inclusion of a requirement to carry a 2 kg extinguisher for explosives category 1 loads? Please explain your reasoning.
Category 1 explosive shipments should have the same requirements as other classes of dangerous goods.
<b>Q31:</b> After reviewing the draft provisions for Chapter 8.1, do you have any comments, concerns or suggested amendments? Please provide details.
<b>Q32:</b> After reviewing the draft provisions for Chapter 8.4, do you have any comments, concerns or suggested amendments? Please provide details.



<b>Q33:</b> After reviewing the draft provisions for Chapter 8.5, do you have any comments, concerns or suggested amendments? Please provide details.
<b>Q34:</b> Do you consider that the journey planning requirements should be placed in Chapter 8.6 or somewhere else? Please provide details.
<b>Q35:</b> After reviewing the draft provisions for Chapter 8.6, do you have any comments, concerns or suggested amendments? Please provide details.

<b>2.9. Code Part 9 – Vehicles</b>
<b>Q36:</b> After reviewing the draft provisions for Chapter 9.1, do you have any comments, concerns or suggested amendments? Please provide details.
<b>Q37:</b> Do you support the provision to mandate a fixed fire-fighting system for EX3 vehicles in the new ADG Code? Please explain your reasoning.
<b>Q38:</b> After reviewing the draft provisions for Chapter 9.3, do you have any comments, concerns or suggested amendments? Please provide details.
<b>Q39:</b> Do you support mandating the AEISG MPU Code in the new ADG Code for design and construction of MPUs? Please provide your reasoning.
<b>Q40:</b> After reviewing the draft provisions for Chapter 9.8, do you have any comments, concerns or suggested amendments? Please provide details.

<b>3.1. Commonwealth explosives and legislation</b>
<b>Q41:</b> Please advise if you consider that these exemptions for commonwealth explosives should be included in the ADG Code? Please explain your reasoning.

### **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.

24/12/2024

**Debra Kirk**  
**National Transport Commission**  
**Level 3/600 Bourke Street**  
**Melbourne VIC 3000**  
**Ph: (03) 9236 5086**  
**Email: adgcode@ntc.gov.au**

Dear Ms. Kirk,

Thank you for the opportunity to comment on the review of the ADG Code.

The Shooting Industry Foundation of Australia represents Australia's major importers of firearms, and related shooting products, that includes small arms ammunition (safety cartridges), propellant powder, and primers.

Firstly, I feel it is necessary to highlight that as a member of the explosives working group, many participants from this group were from regulatory bodies or emergency services, who took a hard-line approach to the requirements around the 'low hazard' products that our industry distributes.

Further, I do not believe that all participants were across the mandatory security requirements for our industry products, that are enforced by the individual jurisdiction, for the transport of consumer quantities of product.

As a result, some participants felt that individual consumers who purchase these products from a retailer should have the same transport requirements as that of an interstate line haul operation. This is simply not feasible.

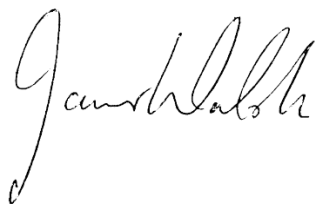
I believe that there could be further concessions and efficiencies realised for our industry that could be added to the code, that would not affect public safety, or the safety of a emergency responder responding to an event.

SIFA fully supports the 'low hazard' definition of explosives, and we also stress that given the low-risk nature of the products captured in this category, and the unique nature of our industry, we would welcome a specific discussion with the NTC around further consideration for our industry.

We also support the efforts to modernise the ADG Code to harmonise Australia with other jurisdictions, the UN and global regulations, to implement limited quantities (LQ). A complete end-to-end LQ integration would significantly increase efficiency for Australian businesses and decrease costs.

We appreciate the opportunity to submit our comments, and we appreciate the work of NTC in this regard. Should any of our comments need further clarification, please don't hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'James Walsh', written in a cursive style.

James Walsh  
Chief Executive Officer

Shooting Industry Foundation of Australia

M: 0419 933 066

E: [james.walsh@sifa.net.au](mailto:james.walsh@sifa.net.au)

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**

<b>Name:</b>	James Walsh		
<b>Email:</b>	<a href="mailto:James.walsh@sifa.net.au">James.walsh@sifa.net.au</a>	<b>Mobile (optional):</b>	0419 933 066
If you are submitting comments on behalf of an association or organisation, please provide the following details.			
<b>Organisation name:</b>	Shooting Industry Foundation Australia		

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

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

<b>2.1. Code Part 1 – General</b>
<p><b>Q1:</b> Which of the following options do you support for the definition of low hazard explosives? Please provide your reasoning.</p> <p>Option 1: Only low hazard explosives meeting the description suggested by the Explosives Working Group (as per the table), or</p> <p>Option 2: Continuing the AEC approach of concessions only for explosives of classification code 1.4S.</p>
<p>Option 1.</p> <p>“Consumer based” low hazard explosives being transported following a sale to a consumer by a retailer, should be exempted from the requirements of the code entirely, given that the possession of shooting explosives is regulated under the Firearms Act &amp; Regulations of the jurisdiction already.</p> <p>Option 1 is fully supported by SIFA as the preferred option for commercial freight operations as the products listed as ‘low hazard’ pose little risk when being transported.</p>
<p><b>Q2:</b> 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.</p>
<p>Listing UN numbers in the code could become cumbersome should a UN number change, or new products need to be added to the low hazard designation. SIFA questions how would the process of amending this in the code be managed?</p>
<p><b>Q3:</b> Are there any entries (UN numbers, DG list entries or product descriptions) that:</p> <ol style="list-style-type: none"> <li>Are listed in the table above that should not be considered low hazard explosives, or</li> <li>Are not listed in the table above that should be considered low hazard explosives?</li> </ol> <p>Please provide your reasoning.</p>
<p>All 1.4s explosives should be considered ‘low hazard’ explosives.</p> <p>SIFA supports the inclusion of 1.4c and 1.4g as low hazard explosives.</p>

<b>Q4:</b> Do you consider that the limits provided in the draft (in 1.1.3.14.3) are appropriate? Please provide your reasoning.
<ol style="list-style-type: none"> <li>1. It is SIFA's position that for shooting related explosives there should be an exemption from the code for a private citizen who is transporting 'low hazard' explosives for personal use. In most instances, the firearms act, and regulations of the jurisdiction, dictate how these products are to be transported and stored.</li> <li>2. SIFA supports the limits as specified in question 2.</li> </ol>
<b>Q5:</b> Do you consider the conditions set out for transport of low hazard explosives and other dangerous goods are appropriate? Please provide your reasoning.
Yes, as they are proportionate to the risk they pose.
<b>Q6:</b> Are there other import or export scenarios that you consider require conditional concessions to prevent unnecessary intermodal barriers? Please:
<ol style="list-style-type: none"> <li>1. outline the scenarios where this occurs; and</li> <li>2. appropriate controls to manage it.</li> </ol>
Please provide your reasoning.
No comment
<b>Q7:</b> After reviewing the draft provisions for Chapter 1.1, do you have any comments, concerns or suggested amendments? Please provide details.
SIFA is supportive of the explosive working group's recommendations. We also support the definitions of load categories.
<b>Q8:</b> After reviewing the draft duties intended for Chapter 1.4, do you have any comments, concerns, or suggested amendments? Please provide details.
As an industry, we have requirements at every jurisdictional level for authorising unsupervised access and handling of explosives. SIFA and the Australian shooting industry need to be consulted on any provision around these requirements.
<b>Q9:</b> What do you consider to be an appropriate level of insurance for incidents involving the transport of explosives? Please provide your reasoning.
This question is better left for commercial transporters to answer. However, the insurance requirements should be discussed with all size commercial transporters to ensure that insurance limits are affordable for those who only transport small quantities.
<b>Q10:</b> After reviewing the draft administrative controls for drivers in 1.8.11, do you have any comments, concerns, or suggested amendments? Please provide details.
No comment
<b>Q11:</b> 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 should be treated based on the level of risk they pose including safety and security.
<b>Q12:</b> After reviewing the draft provisions for Chapter 1.10, do you have any comments, concerns, or suggested amendments? Please provide details.
No comment

<b>2.3. Code Part 3 – DG list and special provisions</b>
<b>Q13:</b> Is there a reason why special provision 616 and the exudation test in 2.3.1 should not be included? Please provide your reasoning.
No comment
<b>Q14:</b> Is there a reason why the LQ values for class 1 should not be included in the DG list? Please provide your reasoning.
SIFA supports the NTC proposal to include the stated LQ values in the dangerous goods list to maintain harmonisation. We note that LQ loads are being utilised safely and successfully by jurisdictions like Australia in other parts of the world. We question how some jurisdictions may deal with LQ given that some individual state regulations may not have provision for LQ loads or the LQ markings. In order to take full advantage of LQ, more work will be needed to be done within the jurisdictions to potentially change regulation to recognise the LQ framework and ensure a consistent approach.
<b>Q15:</b> 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.
The major saving we see is that smaller freight companies will be able to transport LQ items therefore increasing competition in the limited Australian freight market.
<b>Q16:</b> Do you support the removal of tank instructions for the transport of class 1 substances? Please provide your reasoning.
No comment
<b>Q17:</b> Do you have any comments, concerns or suggested amendments relating to Part 3 of the draft ADG Code? Please provide details.
No Comment

<b>2.4. Code Part 4 – Packaging and tanks</b>
<b>Q18:</b> After reviewing the draft provisions for Chapter 4.1, do you have any comments, concerns or suggested amendments? Please provide details.
No issues with the packaging requirements.

<b>2.5. Code Part 5 – Consignment procedures</b>
<b>Q19:</b> Is there a reason why the markings on inner packagings should not refer to the GHS requirements? Please provide your reasoning.
SIFA supports taking a consistent approach across all jurisdictions that including explosive markings etc.
<b>Q20:</b> Is it necessary to retain the provisions relating to marking and labelling on articles and wrappings in the ADG Code? Please provide your reasoning.
SIFA supports taking a consistent approach across jurisdictions.
<b>Q21:</b> After reviewing the draft provisions for Chapter 5.2, do you have any comments, concerns or suggested amendments? Please provide details.
No comment

**Q22:** After reviewing the draft provisions for Chapter 5.3, do you have any comments, concerns or suggested amendments? Please provide details.

There should be no placarding requirement for loads of only 1.4s

**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.

No comment

**Q24:** After reviewing the draft provisions for Chapter 5.4, do you have any comments, concerns or suggested amendments? Please provide details.

No issues with documentation as long as there is no additional burden added, and this would not affect consumer transport of low hazard explosives or LQ loads.

## **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.

No issues on the requirement for commercial transport.

Consumer transportation of 1.4s products should be exempt from any compartment requirements under the code.

## **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.

This should not apply to any low hazard load.

Special provision 4 does not work for consumer transportation of 1.4s explosives and therefore an exemption should be added to the code.

Consumers who maybe transporting propellant powder, ammunition or primers in a private vehicle may only have one compartment (4WD or hatch).

They are also subject to the requirements listed in the jurisdictional firearms act and regulations on the security arrangements for the transport of these goods.

**Q27:** Do you consider that special provisions V3 and V12 need to be retained? Please provide your reasoning.

No comment

**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.

No comment

**Q29:** After reviewing the draft provisions for Chapter 7.5, do you have any comments, concerns or suggested amendments? Please provide details.

No comment



<b>2.8. Code Part 8 – Vehicle crews and operations</b>
<b>Q30:</b> Do you oppose the inclusion of a requirement to carry a 2 kg extinguisher for explosives category 1 loads? Please explain your reasoning.
No opposition for commercial transportation, however it should be made clear by way of exemption that consumer/private transportation of 1.4s does not need to comply with this requirement.
<b>Q31:</b> After reviewing the draft provisions for Chapter 8.1, do you have any comments, concerns or suggested amendments? Please provide details.
No comment
<b>Q32:</b> After reviewing the draft provisions for Chapter 8.4, do you have any comments, concerns or suggested amendments? Please provide details.
SIFA supports the removal of vehicles with category 1 loads having to follow the requirements to monitor vehicles for tyre and brake fires when stopping. In a transportation scenario of category 1 loads, class 1.4s explosives (typically UN0012, 0014, 0044 0055) are not always delivered in palletised format. Smaller quantity loads are delivered to retail outlets by courier style truck operations with other (non-DG) goods. These companies simply cannot comply with a requirement to stay with a vehicle and observe for tyre and brake fires for 15 mins. In this scenario, we believe the requirement for observation was designed for large trucking and linehaul operations, and not for the door-to-door transport of retail quantities of 'consumer' based explosives.
<b>Q33:</b> After reviewing the draft provisions for Chapter 8.5, do you have any comments, concerns or suggested amendments? Please provide details.
No issues with these suggestions, as long as category 1 loads and low hazard explosives remain exempt from the requirements.
<b>Q34:</b> Do you consider that the journey planning requirements should be placed in Chapter 8.6 or somewhere else? Please provide details.
No comment
<b>Q35:</b> After reviewing the draft provisions for Chapter 8.6, do you have any comments, concerns or suggested amendments? Please provide details.
No Comment

<b>2.9. Code Part 9 – Vehicles</b>
<b>Q36:</b> After reviewing the draft provisions for Chapter 9.1, do you have any comments, concerns or suggested amendments? Please provide details.
No comment
<b>Q37:</b> Do you support the provision to mandate a fixed fire-fighting system for EX3 vehicles in the new ADG Code? Please explain your reasoning.
No comment
<b>Q38:</b> After reviewing the draft provisions for Chapter 9.3, do you have any comments, concerns or suggested amendments? Please provide details.
No issues
<b>Q39:</b> Do you support mandating the AEISG MPU Code in the new ADG Code for design and construction of MPUs? Please provide your reasoning.

No comment

**Q40:** After reviewing the draft provisions for Chapter 9.8, do you have any comments, concerns or suggested amendments? Please provide details.

No comment

### **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.

Exemptions should also extend to any business or freight company that has been contracted by the Commonwealth to procure, handle, store or transport these items on their behalf.

### **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.

We are unaware of transport of class 1 by rail, however, would be willing to further examine and investigate this as an option for our industry.