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**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Name:** | Robert Wator | | | |
| **Email:** | Rob.wator@teamglobalexp.com | | **Mobile** (optional): | 0421-918-465 |
| If you are submitting comments on behalf of an association or organisation, please provide the following details. | | | | |
| **Organisation name:** | |  | | |

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

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

|  |
| --- |
| **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), or  Option 2: Continuing the AEC approach of concessions only for explosives of classification code 1.4S. |
|  |
| **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. |
|  |
| **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. |
|  |
| **Q4:** Do you consider that the limits provided in the draft (in 1.1.3.14.3) are appropriate? Please provide your reasoning. |
|  |
| **Q5:** Do you consider the conditions set out for transport of low hazard explosives and other dangerous goods are appropriate? Please provide your reasoning. |
|  |
| **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. |
|  |
| **Q7:** After reviewing the draft provisions for Chapter 1.1, do you have any comments, concerns or suggested amendments? Please provide details. |
|  |
| **Q8:** After reviewing the draft duties intended for Chapter 1.4, do you have any comments, concerns, or suggested amendments? Please provide details. |
|  |
| **Q9:** What do you consider to be an appropriate level of insurance for incidents involving the transport of explosives? Please provide your reasoning. |
|  |
| **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. |
|  |
| **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. |
|  |
| **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. |
| Yes, because creating the LQ value, then means those explosives shall contribute to the placarding threshold of the vehicle, whereas otherwise it would not. I.e. currently can be loaded in unlimited quantities without placarding of the vehicle. The LQ placarding then creates further complication and compliance obligations on the transport carrier. |
| **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. |
|  |
| **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. |
|  |
| **Q21:** After reviewing the draft provisions for Chapter 5.2, do you have any comments, concerns or suggested amendments? Please provide details. |
|  |
| **Q22:** After reviewing the draft provisions for Chapter 5.3, do you have any comments, concerns or suggested amendments? Please provide details. |
|  |
| **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. |
|  |

|  |
| --- |
| **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. |
|  |

|  |
| --- |
| **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. |
|  |
| **Q27:** Do you consider that special provisions V3 and V12 need to be retained? Please provide your reasoning. |
|  |
| **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. |
|  |
| **Q29:** After reviewing the draft provisions for Chapter 7.5, do you have any comments, concerns or suggested amendments? Please provide details. |
|  |

|  |
| --- |
| **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. |
| Yes. As a general carrier we may only have one carton of party poppers, or safety cartridges to deliver to a receiver. The cost of having to fit extinguishers to a fleet of thousands of vehicles nationally in case they may carry one or two cartons of 1.4S (low risk) explosives from time to time is cost inequitable to the risk. Not to mention the maintenance of those extinguishers and the training required in their use. My suggestion would be to make the requirement for extinguishers under clause 8.1.4.1.1 and 8.1.4.1.2 be based on >4.5 tonne vehicles carrying a certain threshold of packaged explosives. e.g. 50kg NEQ explosives. |
| **Q31:** After reviewing the draft provisions for Chapter 8.1, do you have any comments, concerns or suggested amendments? Please provide details. |
|  |
| **Q32:** After reviewing the draft provisions for Chapter 8.4, do you have any comments, concerns or suggested amendments? Please provide details. |
|  |
| **Q33:** After reviewing the draft provisions for Chapter 8.5, do you have any comments, concerns or suggested amendments? Please provide details. |
|  |
| **Q34:** Do you consider that the journey planning requirements should be placed in Chapter 8.6 or somewhere else? Please provide details. |
|  |
| **Q35:** After reviewing the draft provisions for Chapter 8.6, do you have any comments, concerns or suggested amendments? Please provide details. |
|  |

|  |
| --- |
| **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. |
|  |
| **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. |
|  |
| **Q38:** After reviewing the draft provisions for Chapter 9.3, do you have any comments, concerns or suggested amendments? Please provide details. |
|  |
| **Q39:** Do you support mandating the AEISG MPU Code in the new ADG Code for design and construction of MPUs? Please provide your reasoning. |
|  |
| **Q40:** After reviewing the draft provisions for Chapter 9.8, do you have any comments, concerns or suggested amendments? Please provide details. |
|  |

|  |
| --- |
| **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. |
|  |

|  |
| --- |
| **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. |
|  |