

7 May 2018

Hon. Jacinta Allan MP
Minister for Public Transport and Major Projects
Level 20, 1 Spring Street
MELBOURNE VIC 3000

Australian Dangerous Goods Code

Dear Minister Allan

We write in relation to the development and operation of the Australian Code for the Transport of Dangerous Goods by Road & Rail (**the ADG Code**).

By way of background, the Australian Trucking Association (**ATA**) is the peak body that represents trucking operators. The ATA's members include major logistics companies, transport industry associations and businesses with leading expertise in truck technology. The Australian Logistics Council (**ALC**) is the peak national body representing the major and national freight logistics companies, with a focus on national supply chain efficiency and safety.

The ADG Code is reviewed every two years. Amendments from the current review, conducted from December 2017, are set to be finalised by the Transport and Infrastructure Council in May 2018.

As is well known, each State and Territory separately implements the updated ADG Code and associated updates to their dangerous goods transport regulations. It is also the case that each jurisdiction can have a number of different agencies responsible for enforcement of the ADG Code.

This has led to unfortunate inconsistencies both in the legislative implementation of the ADG as well as its interpretation on the ground.

In this context, ALC/ATA requests that the next review of the ADG Code, scheduled for 2020, consider:

1. Whether the ADG Code should be adopted into Australian law using the 'applied legislation' model. This is the same model used by jurisdictions to adopt amendments to the *Heavy Vehicle National Law* made by the Queensland Parliament; and
2. Whether a common operations manual should be developed to be adopted by all jurisdictions to encourage a more uniform interpretation of the ADG.

Should you have any further queries please contact ALC Managing Director Michael Kilgariff at michael.kilgariff@auslogistics.com.au or on (02) 6273 0755 or ATA Chief Executive Officer Ben Maguire at ben.maguire@truck.net.au or on (02) 6253 6900.

Yours sincerely

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