

7 August 2015

Att: Limited Quantities Regulatory Impact Statement Submissions  
National Transport Commission  
Level 15/628 Bourke Street  
Melbourne VIC 3000

**ALC Submission - Transporting Limited Quantities of Dangerous Goods Consultation Regulatory Impact Statement**

ALC is pleased to respond to the Transporting Limited Quantities of Dangerous Goods Consultation Regulatory Impact Statement.

Whilst having no final position on which of the options listed in the regulatory impact statement (**RIS**) is adopted, it is important that whichever option is adopted is appropriate to the structure of the Australian transport market.

Whilst the RIS undertakes an analysis of costs and benefits as they relate to some manufacturing industries and retailers, no such analysis is conducted on how the transport and logistics industry may be affected by any of the options, which is a significant deficiency.

Any RIS prepared through this process will need to consider how the transport and logistics sector goes about the task of moving small quantities of dangerous goods in a country as large and sparsely populated as Australia and whether or not the proposed options will add costs or alternatively distort current business practices, and, if they do, whether the option will improve safety and efficiency outcomes in a way that will provide a net public benefit.

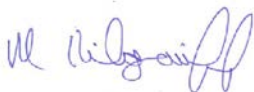
The other point to make is that a proposal will shortly go to the Transport and Infrastructure Council that proposes to add to the Chain of Responsibility a general safety duty on employers, prime contractors and employers to ensure the safety of their road transport operations.

As there is a wish by regulators to move towards these form of general duties, any RIS developed for the purposes of regulating particular classes of goods (such as dangerous goods) will have to consider whether specific regulations dealing with a particular element of the transport and logistics market retain any utility given the general duties proposed to be imposed on relevant duty holders.

Therefore, the RIS will need to consider whether the costs imposed by having to comply with different pieces of legislation dealing with the same public policy issue provide a net public benefit to the Australian community.

Please contact me on 0418 627 995 or at [Michael.kilgariff@austlogistics.com.au](mailto:Michael.kilgariff@austlogistics.com.au) should you wish to discuss this matter further.

Yours sincerely



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