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## **AUSTRALIAN CODE FOR THE TRANSPORT OF DANGEROUS GOODS BY ROAD AND RAIL EDITION 7.6 – CONSULTATION DRAFT**

The Australian Logistics Council (**ALC**) is pleased to make this brief submission on the Consultation Draft of the *Australian Code for the Transport of Dangerous Goods by Road and Rail Edition 7.6 (the Code)*.

By way of background, ALC is the peak national body representing the major and national companies participating in the freight logistics industry, with a focus on national supply chain efficiency and safety.

ALC is supportive of the published Consultation Draft and does not object to the proposed changes it makes to the Code.

### **Emergency Information Panels and Intermediate Bulk Containers**

ALC is aware that, in formulating the Consultation Draft, there was a proposal to amend Part 5.3.3 of the Code. This proposal would have removed the requirement for Emergency Information Panels (**EIPS**) to be placarded on Intermediate Bulk Containers (**IBC**). EIPS would then be replaced by the standard diamonds and markings on the IBC.

In ALC's opinion, the information placarded on an IBC, and on the vehicle itself, must be consistent. Otherwise, this would place a costly burden on the transport provider. Unless there is consistency between vehicle and IBC placarding, this is a change that ALC does not support.

Furthermore, ALC holds concerns that, in the event of an accident, emergency services may find it difficult to determine the chemicals involved if placarding is removed from IBC's. For instance, if an IBC is transported as part of a consolidated load, the vehicle is required to placarded with a Multiload EIP. The Multiload EIP would not provide UN numbers, would have a mixed Dangerous Goods Class Diamond and a General Hazchem Code, none of which would provide any useful information to emergency services.

With this in mind, it is pleasing that this proposal has subsequently been removed from the Consultation Draft.

ALC notes however that the Code is updated biannually and wishes to advise that it will not support a similar proposal when the Code is next updated in 2020.

## **International and National Consistency**

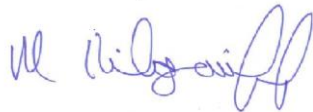
ALC believes that the Code needs to be consistent with international placarding, marking and labelling standards, but not necessarily with regard to transport within Australia.

Such an approach continues to push for international consistency. However, it also takes into account the unique requirements of the Australian transport model. For example, the transport model in Australia is very different to that in Europe, particularly with regard to consolidation.

ALC has also consistently advocated for the Code to be prepared using the 'applied legislation model.' Under such an arrangement, one national law would apply for the application of the Australian Dangerous Goods Code. This is designed to remove variances in state and territory law, leading to a more efficient industry.

Please contact me on +61 (0)2 6273 0755 or at [Michael.Kilgariff@austlogistics.com.au](mailto:Michael.Kilgariff@austlogistics.com.au) should you wish to discuss this submission.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Michael Kilgariff', with a stylized flourish at the end.

MICHAEL KILGARIFF  
Managing Director