

Attachment C – Summary of post public consultation amendments to the draft Code

Provision	Overview of issue	Suggested change	Outcome
1.1.3.1	There were requirements for separation of Low Hazard Explosives / 1.4S from any passenger compartments, which is a requirement that we believe to ignore the reality of the most common passenger vehicles sold today being able to reach the boot etc. from the passenger compartment.	1.1.3.1 (a) and (c) both refer to compliance with 1.1.3.14, which in turn requires compliance with 8.5.2.1.5. Also, 1.1.3.1 (a) and (c) both limit to Class 1.4S. This should be for all LHE transported by individuals.	1.1.3.1 has been substantially rewritten to permit only low hazard explosives.
1.1.3.1(a)	No limit on the quantity of DG for private individuals	Apply 1.1.3.6 limit for private individuals	1.1.1.3 (a) has been amended as follows: <i>(a) The carriage of dangerous goods by private individuals where the goods in question are packaged for retail sale and are intended for their personal or domestic use or for their leisure or sporting activities provided that: measures have been taken to mitigate risks in normal conditions of carriage. Dangerous goods in IBCs, large packagings or tanks are not considered to be packaged for retail sale.</i> <i>(i) No class 1 dangerous goods are carried, are carried, other than low hazard explosives with a maximum NEQ of 1 kg ;</i> <i>(ii) The total quantity of dangerous goods in the load is within the maximum quantities specified in 1.1.3.6.5;</i> <i>(iii) Other than cylinders of LPG for residential gas supply, which shall have a nominal capacity not exceeding 110 litres (water capacity), the capacity of each package shall not exceed 30 litres;</i> <i>(iv) No more than 33 litres (water capacity) of flammable gases in cylinders shall be carried in an enclosed vehicle compartment; and</i> <i>(v) Measures have been taken to mitigate risks in normal conditions of carriage;</i>
1.1.3.1 (c)	The final paragraph (internal distribution) could be read as contradicting the exemption.	Update the wording to remove 'internal distribution'.	The wording has been amended to read 'Carriage undertaken by such enterprises for external distribution does not fall within the scope of this exemption'. Without this, a company might argue that they're not a DG transporter, and so are exempted from the code. This would mean that this exemption can't be used for external supply
1.1.3.1(c)	The wording of Section 1.1.3.1 (c) would allow, for example, civil and engineering enterprises to be exempt for carriage of up to 1000 litres or kilograms of DG. This doubles the current limit of 500 which is a significant increase. This may permit up to 450L in IBCs and allows decanting from IBCs while on the vehicle, which currently requires licensing.	We recommend that IBC be excluded from this exemption, to prevent the interpretation that these can be used full or can be decanted from the back of a truck without a licence. There is also a much greater risk of loss or an incident when using an IBC as opposed to 205L drums, which are much tougher. Large packagings should be excluded from this exemption for similar reasons.	1.1.1.3 (c) has been amended as follows: <i>(c) The carriage undertaken by enterprises which is ancillary to their main activity, such as deliveries to or returns from building or civil engineering sites, or in relation to surveying, repairs and maintenance, provided that: (i) No class 1 dangerous goods are carried, except for low hazard explosives carried in accordance with 1.1.3.14;</i> <i>(ii) The total quantity of dangerous goods in the load is within the maximum quantities specified in 1.1.3.6.5;</i> <i>(iii) The capacity of each package shall not exceed 450 litres;</i> <i>(iv) Measures have been taken to mitigate risks in normal conditions of carriage</i> <i>Carriage undertaken by such enterprises for their supply or external distribution does not fall within the scope of this exemption;</i>

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1.1.3.1 (f)	We are concerned about the exemption granted to empty static storage vessels. The most likely candidate for this exemption is underground petroleum storage tanks. These tanks frequently contain a flammable vapour space despite being nominally empty, and have been repeatedly involved in fires and explosions in NSW. An exemption from dangerous goods transport will encourage transport of these hazardous tanks instead of the safer option of cleaning and certifying the tanks gas free before they are transported.	We recommend that the exemption in (f) be removed. The preferred approach is that contractors clean and certify tanks free from dangerous goods prior to transport. Transporting tanks full of flammable vapour contradicts the hierarchy of controls, under which the hazard should be eliminated by cleaning and gas testing the tank prior to transport. This is an existing exemption. There have been no requests or evidence that it should be revoked. Amend the wording to incorporate conditions from ADG 7.9.	1.1.3.1(f) has been redrafted as follows: (f) The carriage of uncleaned empty static storage vessels which have contained gases of Class 2, groups A, O or F, substances of Class 3 or Class 9 belonging to packing group II or III or pesticides of Class 6.1 belonging to packing group II or III, subject to the following conditions: - All openings with the exception of pressure relief devices (when fitted) are hermetically closed; - Measures have been taken to prevent any leakage of contents in normal conditions of carriage; - The load is fixed in cradles or crates or other handling devices or to the vehicle or container in such a way that they will not become loose or shift during normal conditions of carriage; - The vehicle is placard in conformance with chapter 5.3; - Incompatible dangerous goods are segregated in conformance with chapter 7.5; - Documentation conforming with chapter 5.4 is carried in the vehicle; and - Emergency equipment conforming with chapter 8.1 is carried in the vehicle: This exemption does not apply to static storage vessels which have contained desensitized explosives or substances the carriage of which is prohibited by this Code.
1.1.3.1 Note 2	Section 1.1.3.1 Note 2 – “The dangerous goods are in packagings that are suitable for the type of dangerous goods”. There is no definition for the term type of dangerous goods in the draft Code. We are unaware of instances where the term “type” has been used in this context before. Compatibility of packaging materials and DG are specific to chemical species. General suitability of packaging to a broad categorical "type" of DG may not mean suitability to a particular DG. This can result in a safety design flaw and accidents including but not restricted to tank rupture.	We recommend removing “type of” as there is an understanding that packaging or tanks must be suitable for the dangerous goods carried/contained throughout the draft Code. This ensures consistency of wording with other areas of the draft Code (E.g. 5.2.1.11) and the expectations of the current requirements. Recommended Wording “...the dangerous goods are in packagings that are compatible with the dangerous goods contained.”	This is now Note 2. The text has been amended to read: The dangerous goods are in packagings that are suitable for the dangerous goods
1.1.3.1(d)	Applies to carriage undertaken by competent authorities or under their supervision	Consider changing 'under their supervision' to 'at their direction'. Not sure this exemption as drafted is appropriate as it doesn't require any safety precautions.	Wording has been amended to read: The carriage undertaken by the competent authorities for the emergency response or under their supervision or direction,
1.1.3.5		The term ‘nullify any hazard’ is an existing and accepted term in the current ADG Code that comes from the UN MR. We will explore amending this to ‘cleaned free of dangerous goods but are mindful that amending it in 1.1.3.5 could have consequential impacts on other provisions of the Code. See 4.1.1.11, 4.1.8.4 and 4.3.1.12.	This provision has been retained as drafted.
1.1.3.6	inclusion of UN 3077/3082 in the small loads threshold table could cause confusion		The following Note has been added to 1.1.3.6.4: <i>NOTE 2: Dangerous goods that are not subject to this Code are not counted in the aggregate quantity.</i> Table 1.1.3.6.5 has been amended to remove any reference to these UN numbers.

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1.1.3.6(a)	incomplete sentence about explosives	Complete the sentence.	(a) has been amended to read 'Substances or articles of class 1 in a load of explosives category 2 or 3;'
1.1.3.6.5	Change "unlimited" to "always a small load"		the table note already provides this information. However, the "unlimited" term has been changed to "no threshold" which should be more intuitive
1.1.3.6.5	UN3459 2	UN3459 (which is 6.1), should this be UN3549 instead?	The correct UN number is 3549. The draft has been amended to UN 3549.
1.1.3.6.6	Incorrect referencing	"All relevant provisions of this Code not listed in 1.1.3.6.5 (a) continue to apply." Shouldn't this say 1.1.3.6.6.(a)?	This reference has been amended to 1.1.3.6.6(a)
1.1.3.6.6	Where the load is determined to be eligible for the concessions for small loads, in accordance with 1.1.3.6.1 – 1.1.3.6.5, the following may be applied. All relevant provisions of this Code not listed in 1.1.3.6.5 (a) continue to apply.	There is no section 1.1.3.6.5 (a)	This reference has been amended to 1.1.3.6.6(a)
1.1.3.11	How to determine "originally packed"	Could consider borrowing language from 1.1.3.1 (a) "packaged for retail sale" or similar	<p>1.1.3.11 has been amended to read: Dangerous goods that are a consumer product that is being transported from the point of sale or distribution to a retail customer (or an equivalent return journey) are not subject to this code, provided that:</p> <p>(a) The goods are not dangerous goods of class 1, 4.2, 6.2 or 7. (b) The goods are intended for domestic household use. NOTE: The goods may be removed from their outer packaging for retail sale or final distribution to the retail consumer. (c) The quantity carried on the transport unit does not exceed 30 kilograms or litres per UN Number, and a total of 250 kilograms or litres per transport unit.</p> <p>The following definitions have been added: Consumer product means a thing that: (a) is packed or repacked primarily for use by a household consumer or for use in an office; and (b) the thing is packed or repacked primarily for use by a household consumer—is packed in the way and quantity in which it is intended to be used by a household consumer; and (c) the thing is packed or repacked primarily for use in an office—is packed in the way and quantity in which it is intended to be used for office work. Retail Customer means a customer who purchases a small quantity of dangerous goods packaged for retail sale and are intended for their personal or domestic use or for their leisure or sporting activities.</p>

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1.1.3.11 (b)	The restriction of 30kg/l per <u>type, colour, strength</u> makes no sense. Information was sought from UK who advised that 'colour' was relating to paint colour	This provision requires rewording to specify what the 30 kg/l restriction applies to, e.g. UN number and PG combination.	1.1.3.11 has been amended to read: Dangerous goods that are a consumer product that is being transported from the point of sale or distribution to a retail customer (or an equivalent return journey) are not subject to this code, provided that: (a) The goods are not dangerous goods of class 1, 4.2, 6.2 or 7. (b) The goods are intended for domestic household use. NOTE: The goods may be removed from their outer packaging for retail sale or final distribution to the retail consumer. (c) The quantity carried on the transport unit does not exceed 30 kilograms or litres per UN Number, and a total of 250 kilograms or litres per transport unit. The following definitions have been added: Consumer product means a thing that: (a) is packed or repacked primarily for use by a household consumer or for use in an office; and (b) the thing is packed or repacked primarily for use by a household consumer—is packed in the way and quantity in which it is intended to be used by a household consumer; and (c) the thing is packed or repacked primarily for use in an office—is packed in the way and quantity in which it is intended to be used for office work. Retail Customer means a customer who purchases a small quantity of dangerous goods packaged for retail sale and are intended for their personal or domestic use or for their leisure or sporting activities.
1.1.3.12	Diesel - need to determine appropriate settings	Either continue general exemption for diesel (as in AU02), or introduce requirements with a delayed start date (e.g. 2029 or 2031)	The status quo for diesel has been retained. Regulation of diesel will be the subject of a further review.
1.1.3.13	Exemption for extremely short journeys	Delete this from the draft Code	This exemption has been deleted from the draft code.
1.1.3.15.2		Reference to 1.1.3.15 (a) does not exist, appears it should be 1.1.3.15.2 (a). Twice further in this paragraph there is reference to 1.1.3.15 (b) that does not exist, appears it should be 1.1.3.15.2 (b)	Cross references have been corrected. All cross references will be checked as part of the final proof reading.
1.1.5	Allowance to use updated standards when one is released. Text derived from ADR does not have this as a general feature	consider using similar text to that in 6.8.2.7 "A standard which has been adopted for reference in a future edition of the ADR may be approved by the competent authority for use without notifying the UNECE secretariat."	The use of updated Standards that have not gone through the UN Sub-Committee needs to be approved on a case by case basis. The competent authorities need to be satisfied that the updated Standard is appropriate.
1.1.8.3		remove additional commas from brackets	Provision has been reworded as per consultation paper.
1.2.1	The Note under 'Animal material' is an orphan from a deleted term	This is an error in ADR. This has been confirmed with WP.15	Note not included in updated definitions. This was a remnant of a previously deleted definition form ADR. WP.15 secretariat notified of the error.
1.2.1	Provide a comparison of current definitions against the draft		Comparison prepared, sent to Competent Authorities on 17/02/2025
1.2.1	Definitions specific to Class 7	Should these be deleted?	The definitions for Class 7 will be included in the Code for information
1.2.1	MEGC	Add word "multi modal" to the definition. This seems to have been dropped. I have previously appeared before the CAP to clarify the difference between an MEGC and a "Bundle" of cylinders – multi modal was the critical difference as it requires twist locks and load rating for crane lifts.	The additional of 'multimodal' in ADG 7.9 has led to many issues for land transport in Australia. The updated definition allows for MEGCs that are not used for multimodal transport. A cross reference has been added to Chapter 6.7 for UN MEGCs

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1.2.1	Definitions need updating to capture ADR 25 and some Australian specific	Update definitions in line with comparison document.	Comparison of Current vs proposed definitions sent to CAs 17/02/2025
1.2.1	Need a definition for 'retail customer'	Alternatively, the definition could be incorporated into 1.1.3.11. Consider something like: 'a customer who is going to buy in small quantity and the product usage would be by him or by his family or friends'.	1.1.3.11 has been amended to refer to consumer products. A definition of 'consumer product' has been added to 1.2.1. The definition replicates that in the Model WHS regulations. A definition for 'retail consumer' has also been added.
1.2.3	ADR not included in list of abbreviations	Add ADR to 1.2.3 'means the Agreement concerning the International Carriage of Dangerous Goods by Road'	ADR this been added to the list of abbreviations.
1.2.x	There is no table of referenced Standards.	Suggest may not be required	Standards are referenced in the provisions where they apply.
1.4.4	"DRAFTING NOTE" shows these provisions may be combined with 1.4.3.		The drafting note has been deleted
1.6.1.6	Unexplained reference to "marginal 3612"		This reference has been deleted
1.7	Concerns about confusion that ADG Code applies to class 7	Add chapter note for class 7	The following Note has been added at the start of Chapter 1.7: <i>NOTE: Articles and substances of class 7 are regulated under legislation other than dangerous goods transport legislation and the ADG Code. This chapter should be considered informative.</i>
1.8.3	There does not appear to be enough support making DGSA's mandatory at this point in time.	Revisit this as part of the training project. In the meantime, consider redrafting this section, keeping it high level for now as a holding place and signalling intent to keep working on it.	1.8.3 has been retained as a recommendation.
1.8.3	1.8.3 of the draft code should be redrafted, whether DGSAs are recommended or mandatory. In its current form, s 1.8.3 is indeterminate and is not consistent with the requirement that national standards be in plain language.	<ul style="list-style-type: none"> replace 'requirements applicable,' which is insufficiently precise, with 'requirements under the MSI and ADGC' remove the words 'safest possible way,' which is again insufficiently precise. Businesses and individuals have specific duties under the dangerous goods legislation. DGSAs should be responsible for advising on and monitoring those duties. If it is decided to retain the 'safest possible way' concept, it should be changed to 'so far as is reasonably practicable' for consistency with the WHS Act remove the statement that annual reports must be 'made available to national authorities at their request.' Section 58 of the Model Act already provides authorised officers with the power to issue directions to produce records fully list the duties of DGSAs, rather than providing what could be seen as partial list use pronouns in line with Australian drafting practice. 	The provisions for DGSAs have been retained as a recommendation. They will be reviewed ad part of the NTC's DG training project, which will commence once the revised Code is endorsed by Ministers.
1.8.3	Safety Advisors required for each undertaking filling /loading	Can this be consolidated or is it intended to have an advisor at every facility? May not be practical?	The provisions for DGSAs have been retained as a recommendation. They will be reviewed ad part of the NTC's DG training project, which will commence once the revised Code is endorsed by Ministers.
1.8.3.3	Annual report to management and CAP	Can this report be consolidated and ideally a template provided?	The provisions for DGSAs have been retained as a recommendation. They will be reviewed ad part of the NTC's DG training project, which will commence once the revised Code is endorsed by Ministers.

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1.8.4	An obligation to provide CAP members to NTC, and for NTC to publish them, does not belong in the ADG Code. All information relating to CAP belongs in legislation or the CAP Rules. Rather than assist readers, including this type of information in the ADG Code causes it to be more dispersed and not consolidated in a single place. It becomes harder to find and consider all relevant information.	Agree, this belongs in the CAP Rules	This provision has been deleted.
1.8.5	Concerns that the draft definition did not align with the current definition Concern that the draft definition may be difficult to interpret by duty holders Inconsistent notification requirements across jurisdictions (class 1 especially)		Aligned with the definition of dangerous situation in the current MSI. 1.8.5.1 has been restructured to make the detailed information, on when an incident should be considered a dangerous situation, clearer.
1.8.5.4	Insurance for occurrences during the carriage of dangerous goods should be amended to reflect a higher sum of 5 million dollars for clean-up of a DG incident.	data is being sought from insurance providers to help with setting an appropriate insurance minimum requirement.	Insurance will be reviewed as a separate project
1.8.5.4	Insurance requirement when \$5M is insufficient	Consider adding in note or text that clarifies that additional insurance may be necessary depending on the load carried.	The following Note has been added to 1.8.5.4: <i>NOTE: the minimum insurance outlined in this clause may be insufficient for some types and quantities of dangerous goods carried, and the nature of the transport operation.</i>
1.8.7.2	Code may not be not clear enough that approved designs can continue to be used in transport post-expiry	Add note clarifying this point (may belong elsewhere).	A transitional arrangement will be added in Chapter 1.6 The administrative controls for tank approvals have been applied to tank vehicle approvals as well.
1.8.9.6	Concern that this might be a competent authority requirement		Change "the approval" to "the application for approval"
1.8.10	FURTHER DEVELOPMENT REQUIRED		This will be updated during drafting of the model legislation.
1.10	Consider adding a note clarifying that this information may form a part of other policies and procedures, and is considered to be met if those documents address the issues in Chapter 1.10.		A deemed to comply note has been added.
1.10.1.6	Requirement to maintain register of training certificates	This should refer to licenses - this is a hangover from ADR, which does not use licences. May be appropriate to remove this provision if covered in the licensing section.	This has been reworded to require a register of licences
1.10.3.1.2	Question marks for the threshold quantity of ammonium nitrate		The SSAN threshold has been amended to and agreed 0 for tanks and bulk and 20 kg for packaged. A table note has been added that the threshold varies between jurisdictions

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2.1.2.4	Wording requires redrafting to include Appendix A	<p>2.1.2.4 Goods not to be accepted for carriage</p> <p>NOTE: Goods not accepted for carriage are also known as “goods too dangerous to be transported”, and these terms are equivalent.</p> <p>2.1.2.4.1 D Dangerous goods which are listed or defined in sub-section 2.2.x.2 of each class are not to be accepted for carriage.</p> <p>2.1.2.4.2 D Dangerous goods which are listed in Appendix A1 to this Code are not to be accepted for carriage, except as authorised by the competent authority.</p> <p>2.1.2.4.3 D Dangerous goods which are listed or meet the criteria set out in Appendix A2 to this Code are not to be accepted for carriage, unless the necessary steps have been taken to ensure they fall within the conditions set out in the description or in a special provision.</p> <p>Such necessary steps may include the use of diluents, stabilisers, inhibitors, desensitisers, phlegmatizers, solvents, wetting agents or adulterants to overcome the instability inherent in the dangerous goods.</p> <p>2.1.2.4.4 D Dangerous goods which have been determined by the competent authority to be too dangerous for carriage are not to be accepted for carriage.</p>	This provision has been updated to include a reference to Appendix AA - the list of goods too dangerous to be transported, and the criteria specified in Appendix AB.
2.2.9.1.13	Heading text is misaligned		Heading text has been moved to align with provision number
SP309A	The wording in the draft Code does not reflect the agreed wording as per consultations with CAP.	Update to reflect the wording agreed by competent authorities	Wording of SP 309A has been updated to reflect the draft wording as consulted with competent authorities
SP375A	<p>The wording in (b)(i) is ambiguous.</p> <p><i>375A These substances are not subject to any other provisions of this Code provided the following are met:</i></p> <p><i>(a) when carried in single or combination packagings containing a net quantity per single or inner packaging of 30 l or less for liquids or having a net mass per single or inner packaging of 30 kg or less for solids, the packagings meet the general provisions of 4.1.1.1, 4.1.1.2 and 4.1.1.4 to 4.1.1.8.</i></p> <p><i>NOTE: In the UN Model Regulations, the maximum net quantity is 5 kg/l. The 30 kg/l applies only to transport by road or rail wholly within Australia.</i></p> <p><i>(b) when carried in single or combinations packagings with a capacity exceeding 30 l for liquids or having a net mass per single or inner packaging exceeding 30 kg for solids:</i></p> <p><i>(i) packagings meet the relevant provisions of 4.1; and</i></p> <p><i>(ii) they are marked and labelled in conformity with 5.2.1 and 5.2.2</i></p>	<p>Suggest amending as follows:</p> <p>375A These substances are not subject to any other provisions of this Code provided the following are met:</p> <p>(a) when carried in single or combination packagings containing a net quantity per single or inner packaging of 30 l or less for liquids or having a net mass per single or inner packaging of 30 kg or less for solids, the packagings meet the general provisions of 4.1.1.1, 4.1.1.2 and 4.1.1.4 to 4.1.1.8.</p> <p>NOTE: In the UN Model Regulations, the maximum net quantity is 5 kg/l. The 30 kg/l applies only to transport by road or rail wholly within Australia.</p> <p>(b) when carried in single or combinations packagings containing a net quantity per single or inner packaging of more than 30 l for liquids or having a net mass per single or inner packaging of more than 30 kg for solids with a capacity exceeding 30 l for liquids or having a net mass per single or inner packaging exceeding 30 kg for solids:</p> <p>(i) the packagings meet the general provisions of 4.1.1.1, 4.1.1.2 and 4.1.1.4 to 4.1.1.8 packagings meet the relevant provisions of 4.1; and</p> <p>(ii) they are marked and labelled in conformity with 5.2.1 and 5.2.2</p> <p>Consider changing to require marking (including EHS mark) but not labelling. The provision would need to permit (but not require) Class 9 label</p>	<p>AS375A has been amended to read:</p> <p><i>When carried in packages, these substances are not subject to any other provisions of this Code provided the following are met:</i></p> <p><i>(a) When carried in single or combination packagings containing a net quantity per single or inner packaging of 30 l or less for liquids or having a net mass per single or inner packaging of 30 kg or less for solids, the packagings meet the general provisions of 4.1.1.1, 4.1.1.2 and 4.1.1.4 to 4.1.1.8.</i></p> <p><i>NOTE: In the UN Model Regulations, the maximum net quantity is 5 kg/l. The 30 kg/l applies only to transport by road or rail wholly within Australia.</i></p> <p><i>(b) When carried in single or combinations packagings with a capacity exceeding 30 l for liquids or having a net mass per single or inner packaging exceeding 30 kg for solids:</i></p> <p><i>(i) the packagings meet the general provisions of 4.1.1.1, 4.1.1.2 and 4.1.1.4 to 4.1.1.8; and</i></p> <p><i>(ii) they are marked in conformity with 5.2.1.</i></p> <p><i>NOTE: 5.2.1.8 requires packages containing environmentally hazardous substances to be marked with the environmentally hazardous substance mark. The use of the class 9 label is also permitted by this Code but is not required.</i></p>
3.4.1	(c) is incomplete in that the exceptions have not been included.	Amend (c) to read: Part 3, Chapters 3.1, 3.2, 3.3 (except special provisions 61, 178, 181, 220, 274, 625, 633 and 650 (e));	Missing text added to 3.4.1(c) as per suggested change.

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3.4.1	Under ADR section 3.4.1 (c) provides an exemption for SP 625, while in the proposed code section 3.4.1 (c), no exemption for SP 625 is listed. This means that the proposal will result in all aerosol packages being marked with “UN 1950 AEROSOLS” irrespective of quantity, while the ADR exempts Limited Quantities of aerosols from the DG marking.	add the exceptions in ADR under section 3.4.1 (c) into the proposed ADG Code. Check for full alignment to ADR	Missing text added to 3.4.1(c) as per suggested change.
3.4.1	Changes to the Code under Option 4' states that this new marking specified in SP 625 would be required for packages of aerosols transported under Limited Quantities provisions. This change – if it is intentional - is not consistent with the ADR	Amend (c) to read: Part 3, Chapters 3.1, 3.2, 3.3 (except special provisions 61, 178, 181, 220, 274, 625, 633 and 650 (e));	Missing text added to 3.4.1(c) as per suggested change.
3.4.12.1(b)(iii)	Total aggregate quantity should be replaced by total quantity. The draft code uses aggregate quantity when calculating the quantity of all DG in the load. For a single substance (UN number and PG, total quantity is used.	Delete 'aggregate'	The words 'an aggregate' in 3.4.12(b) have been replaced with 'a total'. 'The word 'aggregate' has been deleted from 3.4.12.1(b)(iii)
4.1.9	Consider adding note about radioactive regulation		A general note has been added at the start of the Code
4.2.3.7 (TU39)	Holding time – marked on vessel and transport docs	This is a new requirement similar to IMDGC – it may not be practical for every ISO movement in the current supply world. Solution will be to be very conservative with estimated holding time marked on vessel – delete requirement to hand write on transport documents.	This is an existing requirement that has been carried forward. (see ADG 7.9, 11.1.1.5.13
4.3.2.2.4	wording of large compartment rule		The information has been reorganised into bullets. Also added note about applying to all large compartments. The text requires this, but it might not be clear to all code users
4.3.2.4.4	Empty fixed tanks (tank-vehicles), demountable tanks, tube-vehicles, tank containers, tank swap bodies and MEGCs, uncleaned, may also be carried after the expiry of the periods established in 6.8.2.4.2 and 6.8.2.4.3 for undergoing the inspection.	There is no section 6.8.2.4.2 or 6.8.2.4.3.	Redrafted to clarify that the reference is to provisions 6.8.2.4.2 and 6.8.2.4.3 in ADR. Reference to AS 2809 has also been included.
5.1.4 and 7.5.2	7.5.2 replaces the current 9.1, thus providing incompatibility guidance for the application of 5.1.4, but this is not clear enough for the packers understanding.	Amend 5.1.4 to also reference to the application and use of 7.5.2 compatibility guidance	No change. 5.1.4 refers to marking of packages containing more than one type of DG. 7.5.2 relates to segregation on a vehicle.
5.2.1.5.4.1	The marking and labelling for the substance contained shall be in the form of an emergency information panel as set out in 5.3.2 on at least two sides. A panel shall be located either: (a) above any lifting points intended or used for forklift tines; or (b) below any lifting points intended for top lifting.	EIPs no longer required on IBCs.	5.2.1.5.4 has been deleted in its entirety
5.2.1.5.4.2	Where an IBC has a capacity of not more than 1500 L, the dimensions of the emergency information panel may have dimensions not less than half those required by 5.3.2.	EIPs no longer required on IBCs, regardless of capacity.	This provision has been deleted.
5.2.2.1.7	Intermediate bulk containers of more than 450 litres capacity and large packaging's shall be labelled on two opposite sides.	What labelling is required?	IBCs require standard package marking and labelling, i.e. class label(s), UN number, proper shipping name, contact details, etc.

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5.3.1.4.2	When the tank-vehicle, tank-wagon or the demountable tank carried on the vehicle or wagon has multiple compartments and carries two or more dangerous goods, the appropriate placards shall be displayed along each side at the position of the relevant compartments and one placard of each model shown on each side is required to be displayed at the rear of the vehicle.	So, placards are required on each compartment of a multicompartment tank?	No, 5.3.1.4.3 allows placards to be displayed only once along each side and at both ends, if it's placarded in conformance with 5.3.2.1.3 or 5.3.2.1.4.
5.3.1.4.3	When the tank-vehicle, tank-wagon or the demountable tank carried on the vehicle or wagon has multiple compartments and carries two or more dangerous goods carries two or more dangerous goods and is placarded in conformance with 5.3.2.1.3 or 5.3.2.1.4, the placards prescribed in 5.3.1.4.2 need be displayed only once along each side and at both ends of the tank container or portable tank.	Same wording twice.	Repeated wording has been deleted.
5.3.1.5	Placards required on 4 sides No class 7 requirements		5.3.1.5.1 to 5.3.1.5.4 redrafted to clarify location of placard required on each end of the vehicle. Also required on sides for combination vehicles or vehicles carrying Class 7.
5.3.2	Reference to Figures that are out of place.	5.3.2.1.2 refers to Figure 5.3.2.2.3 (a), two pages over. This makes it hard for some learners to follow along. Surely this Figure could be positioned closer to, or duplicated nearer to 5.3.2.1.2 and 5.3.2.1.4? This is an issue carried over from edition 7.	The examples of EIPs are collocated with the specifications.
5.3.2.2.1	Convert dimensions to consistent units		Done
5.4.0.2	The use of electronic data processing (EDP) or electronic data interchange (EDI) techniques as an aid to paper documentation is permitted, provided that the procedures used for the capture, storage and processing of electronics data meet the legal requirements as regards the evidential value and availability of data during transport in a manner at least equivalent to that of paper documentation.	Provision 5.4.0.2 permits the use of electronic data processing (EDP) or electronic data interchange (EDI) techniques as an aid to paper documentation. It is not permitted as an alternative to paper documentation. Provision 8.1.2 specifies the physical documentation that must be carried on board. Consider if the Note in 5.4.0.1 directing the reader to 8.1.2 requires further clarification.	Have moved note and strengthened reference to hard copy documentation
5.4.1.1.1(f)	talks about total quantity - we should consider clarifying this for users. Also need to replace 'aggregate quantity' in the first line with 'total quantity'	Replace 'aggregate quantity' in first line with 'total quantity'	5.4.1.1.1(f) now reads "the total quantity of each item"
5.4.1.1.1	Need a general requirement for additional information needed by the driver		added (l) to require "special provisions for carriage and any supplementary requirements for loading, stowage, carriage, handling and unloading;
5.4.3.2.4 (a)	make sure intent of this clause is clear	Consider rewriting with two sub-clauses: the Australian & New Zealand Emergency Response Guidebook (ANZ-ERG): (i) Current at the time this edition of the ADG Code was published, or (ii) A subsequent version published after this edition of the ADG Code was published. Alternative: the 2024 Australian & New Zealand Emergency Response Guidebook (ANZ-ERG 2024), or a subsequent edition published by the NTC.	Will revisit this when we have an implementation date for the revised Code

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6.11.4.4	6.11.4.4 These bulk containers shall be approved by the competent authority and the approval shall include the code for designating types of bulk containers in accordance with 6.11.2.3 and the requirements for inspection and testing as appropriate.	Currently not all Competent Authorities approve BK2s.	Bulk containers require approval. All competent authorities should have processes in place to do the approvals. Provision retained as drafted
6.15.1	In Clause 6.15.1, there are errors with the references in the clause:	Change 6.11.2 to 6.15.2 Change 6.11.3 to 6.15.3 Change 6.11.4 to 6.15.4	Cross references have been corrected.
6.2.6.4	Reference to AS 2278 is not version specific	Update to version-specific referencing	The reference is currently "AS 2278 as applicable at the date of manufacture". This doesn't allow for a referencing a specific version.
6.4	confirm this chapter only applies to class 7	Add explanatory note about class 7 regulation if appropriate	NFA. The Chapter heading is very clear that it applies only to Class 7.
6.8.1.3	Concerns expressed that the code may incentivise hybrid tank designs (ADR/AS 2809)		Slight redrafting of 6.8.1.3 and note to make clear that tanks are designed to a single design style
7.5	Check draft for use of MEMU in this section, should be consistently named MPU.	Also for the rest of the Code. Use the term MPU in place of MEMU	All instances of MEMU have been replaced with MPU
7.5	Should there be a requirement to identify strong acids on TD?		The addition of Table C in 3.2.3 makes it easy to identify strong acids by their UN number.
7.5	Means of segregation and separation for rail wagons still needs to be resolved.		These have been added in 7.5.3
7.5.1.2	(c) serviceable. References door hinges, seals and hardware	ISO containers used on rail commonly have the doors removed prior to rail travel because rail companies have safety concerns about doors opening in transit. Can we clarify doors should be fitted and secured closed?	7.5.1.2(c) has been amended to read: <i>Doors, door hinges, door seals and hardware that are seized, twisted, broken, missing or otherwise inoperative.</i>
7.5.11 CV33	CV33 only applies to class 7 - consider adding clarifying note	Clarification is not required. CV 33 is only assigned to Class 7 entries in the DGL. There is no path to CV 33 other than from Class 7 provisions.	Retained as per draft.
7.5.2	Changes to what was table 9.2, now within 7.5.2 When talking about strong acids and alkalis, it no longer mentions the wording "concentrated". The wording concentrated has previously helped me explain to students that this defines the issue to be with DG classified acids and alkalis, and not those that are not concentrated enough to meet the classification requirements of SP223, now dealt with in part 2 – classification with no SP reference required. Could this wording "concentrated" be reapplied?	When talking about strong acids and alkalis, it no longer mentions the wording "concentrated". The wording concentrated has previously helped me explain to students that this defines the issue to be with DG classified acids and alkalis, and not those that are not concentrated enough to meet the classification requirements of SP223, now dealt with in part 2 – classification with no SP reference required. Could this wording "concentrated" be reapplied?	The segregation requirements for Strong Acids has been updated to align with the current IMDG Code, which was the original source document. The requirement is now 'Strong acids of PG I or PG II must be segregated from alkalis of PG I or PG II. Appendix C in 3.2.3 provides a list of all UN numbers that are strong acids or are alkali.
7.5.2	Previously and elsewhere this wording has been strong, concentrated acids with strong, concentrated alkalis. There is no need to require segregation for a dilute solution of hydrochloric acid, which is still a strong acid but which may only be corrosive to metals at this concentration, and a similarly dilute sodium hydroxide solution, which is still an alkali.	consider specifying that PG I and II materials require segregation, but that PG III acids do not require segregation from PG III alkalis unless there is a dangerous reaction, such as between acids and hypochlorite solution.	The segregation for Strong Acids from Alkalis has been reworded to Strong Acids of PG I or PG II from Alkalis of PG I or PG II
7.5.2	in the Segregation table, the combination of 3 and 6.1 gets note 3, Mixed loading permitted other than exceptions in the following table, but there is no exception in the table that relates to this. Perhaps this was held over from the current requirement for nitromethane with any toxic goods, which never made any sense and has happily been removed.	Suggest replacing the '3' at the intersection of 6.1 and 3 with 'Y'	The '3' at the intersection of 6.1 and 3 has been deleted and replaced with 'Y'.

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7.5.2	Segregation exemption for MPUs	Include an appropriate exemption for MPUs. Check if an exemption is also needed for scenarios where a trailer is being towed	7.5.2.3.1.3 provides an exemption from the mixed loading provisions for MPUs used in accordance with Chapter 4.7 A vehicle transporting a vehicle containing dangerous goods, as a load, as the vehicle being carried - see 7.1.8
7.5.2	Packages bearing different danger labels shall not be loaded together in the same vehicle or container unless mixed loading is permitted according to the following Table based on the danger labels they bear	Packages Dangerous Goods bearing different danger labels shall not be loaded together in the same vehicle or container unless mixed loading is permitted according to the following Table based on the danger labels they bear	The wording of 7.5.2.1 has been amended to read ' <i>Unless mixed loading is permitted according to the following table, dangerous goods bearing different danger labels shall be segregated from incompatible goods in conformance with 7.5.2.3.</i>
7.5.2.1	This is the only place where the term 'fire-risk substance' is used. Add the definition here rather than in 1.2.1.	Add a definition or note to '2' in the segregation table legend. Include combustible liquids.	A new category of 'other' has been added to the mixed loading table. 'Other' has been defined in a table note. <i>* NOTE: For classes 1 and 5 the "other" category includes combustible liquids and fire-risk substances (readily ignitable solid substances, including paper, hay, sawdust and wood chips). For class 1 only, the "other" category also includes domestic, commercial or industrial waste.</i>
7.5.2.1 (AU07)	Need to carry forward the current exemption for segregation of Chlorine in AU07		7.5.2.1 has been amended to include the following Note. Note. <i>NOTE 1: for UN 1017 Chlorine, the subsidiary hazard of 5.1 does not need to be considered for determining mixed loading.</i>
7.5.2.3	Needs rewording to incorporate both packages and tanks (all substances and articles)		7.5.2.3 has been reworked to incorporate Class 1. Other than for Class 1, the methods of segregation apply equally to packages and tanks. Provisions have been rationalized and realigned to aid correct application.
7.5.3	Protective distance: The requirement for this protective distance is met if the space between the buffer head of a wagon or the end wall of a large container, portable tank or road vehicle and the buffer head of another wagon or the end wall of another large container, portable tank, tank-container, MEGC or road vehicle is: (a) at least 18 m, or.	Is there supposed to be more information after or in this section.	This was an unintended drafting omission. This section has had substantial changes.
7.5.4	The use of partitions for segregation isn't appropriate for liquids.	Consider allowing for solids but not liquids.	The use of partitions for segregation has not been carried forward.
7.5.5.3	7.5.5.2.3 (c) states "Packaged explosives shall only be carried in compartments that meet the requirements of 6.12.5;" However there is no section 6.12.5 in the draft supplementary code for class 1 explosives.	Chapter 6.12 - REQUIREMENTS FOR THE CONSTRUCTION, EQUIPMENT, TYPE APPROVAL, INSPECTIONS AND TESTS, AND MARKING OF TANKS, BULK CONTAINERS AND SPECIAL COMPARTMENTS FOR EXPLOSIVES OF MOBILE PROCESSING UNITS (MPUs) was inadvertently left out of the public consultation version of the draft code.	Chapter 6.12 has now been included in the draft code.
8.1	Do we need to be explicit about extinguishers not being in the load compartment?		the words 'external to the load area' have been added.
8.1.2	No special requirements for rail transport, in particular what is meant by "transport unit", and how would this be interpreted.	Check RID, and if no suitable provisions, bring forward 11.1.4 from ADG 7	duplicated "each vehicle in a combination" requirement for trains. Reorganised 8.1 to include train requirements for documents from ADG 7.9
8.1.2.2	Paper copies of approval documents, exemptions and determinations to be carried in every vehicle	Edit this requirement to 'copies of documents to be provided within 24 /48 hours of a demand by an authorised official.	This provision is now 8.1.1.2. No change required, this only applies to documents required to be carried in transport.
8.1.2.3	Reference should be to 8.1.2.3 (a) and (b), not 5.4.3	update references	This provision has been renumbered as 8.1.1.3. Cross references have been corrected.
8.1.4.1.2 (b)	Reduce complexity of requirements	should simply require load extinguishers to be 4.5 kg or greater	Provisions relating to fire-fighting equipment have been substantially redrafted.
8.1.4.1.2(ii)	clarify intent is for only 2 extinguishers		See comments for 8.1.4.1.2(b)

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8.1.4.1.6	Extinguisher location (sides of vehicle) is too conditional	convert should to shall	This would be an uplift from current requirements, which provide some flexibility. The provision has been retained as per the draft and the current requirements.
8.1.4.3.2	Consider requiring foam extinguishers to be no less than 9 L capacity		We could consider making a 9L extinguisher equivalent to a 4.5 kg extinguisher?
8.1.4.3.2	Consider adding encapsulating agent extinguishers		Research suggests that encapsulating agent extinguishers are currently classed as a water extinguisher, and therefore already included.
8.1.5	consider adding in 8.1.5 a requirement that any equipment identified as part of the TERP that must be carried is carried and appropriately maintained.		This is already included in 8.1.5.1 and 8.1.5.5
8.1.5.2		Inclusion of safety standards and minimum requirements around the required safety equipment.	Earlier consultation examined this question and determined that standards should not be explicitly referenced except for fire extinguishers
8.1.5.3		Change “and” to “and/or”.	changed to "or"
8.1.6.1	Current code allows for the holder to be placed on a door of the cabin in 11.2.2.1 (a) and (b). The new code only allows for the driver’s door in 8.1.6.1 (a) and (b)	It can be very inconvenient for it to be specifically on the driver’s door, for a number of reasons. Can this be changed to reflect the current requirement?	This has been redrafted to permit another door to be used, provided a notice is on the driver's door. Unlike other locations in the cab, this is permitted regardless of whether the driver's door is not possible to use.
8.1.6.2	Reference to the words “emergency procedure guides” or “emergency information” in red letters at least 10 millimetres high on a white background.	Can this be extended to outline the requirements of the notice affixed to the inside of the driver’s door of the cabin, when the EIH is located elsewhere in the cabin (8.1.6.1 (c))? I have had questions from transport companies regarding this.	The following specifications have been added: <i>The notice shall be in red letters at least 10 millimetres high on a white background</i>
8.1.7.1.1	Subjective requirements	Not sure how to fix though	Possibly a good candidate for guidance - NSW EPA is doing some work on this
8.1.7.1.3	We We should specify which type of hose from this standard – AS2683 – as it is not clear in the standard My My belief is a type 1, grade 3 kind 1 Do Do we need to specify this is for liquid and vapour hoses This This standard is listed as WITHDRAWN on the standards store, so not sure what that means but seems strange to reference a withdrawn standard in a new version of the ADG?		We can refer to a withdrawn standard if it is still in use. Prefer not to specify a particular hose in the code itself
8.1.7.2.2.1	Annual hydro test of transfer hoses	No argument with the requirements. In a large country I thought we had a determination that the ongoing testing was 12 months from entering service and not date of original hydro test. Hoses can be in storage for many months prior to entering service.	The requirement has been reinstated and slightly reworded for clarity.
8.1.7.2.3	Typo – should be kind 2 not 2 squared		This is a footnote reference. This has been moved from a footnote to an inline note
8.1.7.2.3.3	Should read end couplings when connected does not exceed.... – just to be clear		This provision has been reworded to read: <i>If a hose assembly consists of two or more Kind 1 hose assemblies coupled together, it shall be constructed, assembled and maintained, so that the resistance between the end couplings when connected does not exceed 10 Ω .</i>
8.1.7.3.3	Motherhood statement??? Also 8.1.7.4.1		Agree that this is a motherhood statement, but as a general requirement it is acceptable.

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8.1.7.5.1	Should include that the marks can be for a system bolted together – not every part of the system – change “ALL equipment” We can not individually mark every strainer, pump, camlock, valve, etc in a pump system		Changed to "equipment or assemblies of equipment". Ending changed to "allows it to be identified for maintenance purposes."
8.2.2	Detail for TLILIC0001 course	This might be better as an appendix / guideline	To be reviewed during training project
8.2.2.4.4 (b)	Learning materials consisting of student handbooks, guides or workbooks, but 8.2.2.7.4.1 states closed book, in line with the new CAP MAI requirements.	It is pointless for us trainers to produce and provide student handbooks, guides or workbooks when the assessment requirements are closed book, requiring the students to find it in the legislation directly anyway. On the subject of the students creating their own individual notes - they are not generally accustomed to appropriate note taking practices within a classroom environment, and get lost in writing down either too much or not enough information in a poorly constructed manner. Either way, this slows down the class and learning process, through either chewing up delivery time when they are trying to write down too much, or assessment time because they haven't written down enough guidance for themselves. This in turn reduces the amount of information I am able to get access to them in the timeframe of the course. The closed book requirement does not work well in practice, and has caused many frustrations due to the complexity of the information that they are trying to comprehend. That is why student handbooks, guides or workbooks were helpful for translation and comprehension.	8.2.2.7.4.1 allows students to have the following materials: (a) Current jurisdictional DG transport legislation; (b) This Code; (c) Emergency Action Code (Hazchem codes) handouts; and (d) A student's own individual notes.
8.3.10	Consider rewording to "dangerous situation" and "breakdown"		(d) and (e) of 8.3.10 have been reworded as follows: (d) in a dangerous situation requiring the trailer to be detached in the interests of safety; or (e) in the event of a breakdown on a road or street.
8.4.2.2	A driver that is not able to continue driving due to fatigue-related laws may park in a position that is not normally permitted by 8.4.2.1, provided the driver complies with the requirements of 8.4.2.1 as far as is practicable in the circumstances.	What is considered far as is practicable in this section.	What is practicable will need to be considered in the context of each individual circumstance. The journey plan requirements in Chapter 8.6 helps ensure that only unplanned, unforeseen and unavoidable situations could be considered.
8.5.1 S6, S11, S12	These S provisions only apply to class 7. Consider adding clarifying note		The only pathway to these special provisions is from a requirements for Class 7.
8.5.2.2.2	Numbering error, should be 8.5.2.2.3		The numbering has been corrected
8.7.1.3	NOTE: The regulations empower emergency services and the competent authority to direct or undertake transport transfer that is not strictly in compliance with this code or the regulations, including transfer to manage a dangerous situation.	Delete 'transport'	This was a typographical error and has now been corrected.
8.7.3.3.3.4	include a clause that the operator must verify that all valves and closures are closed before carriage		The first paragraph has been amended to read: <i>All closures and valves that were removed or opened to enable the transfer to take place shall be reinstated or closed after the transfer is completed, with this closure verified.</i>
8.7.4.2.3	Residential LPG transfers do not permit one person to see the truck and the receptacle at the same time and we can't use 2 people for this		AS 1596 is permitted for LPG - will reorder clauses to reflect this

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8.7.4.2.4	Grammar – this doesn't make sense “.. transfer hose made of concrete...”		The clause has been reworded for clarity
8.7.4.3.1	Loading spear permanently fitted in a tanker does not touch the bottom but is bonded to the shell at the top		Consider that this is covered in (a)
8.7.4.3.4	this is quite limiting and not sure this applies to tanker trucks – loading through a loading arm is a pipeline I guess – so OK there but unloading is always through a nozzle for a pump truck – so not sure what AS1940 allows for tankers?		This is an existing requirement. It also only applies in public places
9.1.2.1	It is unclear how to apply requirements to a towing vehicle that is not approved (prime movers are the main issue here)	ADR 9.1.2.1 para 3 is clear that a prime mover must undergo inspection, but it can be waived on the basis of a declaration. Clarify that the towing vehicle for an FL, etc vehicle must also comply with 9.2. Determine appropriate inspection/record keeping requirements	9.1.2.1.2 requires the completed vehicle to be approved.
9.1.6.1	Every complete or completed vehicle shall be subjected to an initial inspection to verify conformity with the relevant technical requirements of Chapter 9.2. This inspection shall ensure that the vehicle complies with its approval.	Who has the responsibility to do this initial vehicle inspection. Should 9.1.7.3 be replicated as 9.1.6.3	Guidance will be prepared
9.2.2.1	Demountable tanks shall comply to all provisions once mounted to a vehicle This is difficult for brake interlocks over gates, etc as you can't integrate to the chassis Often trailers are not suited with all the wiring covered, etc and they may not be transferring product while on the trailer The demountable tank will not comply with the tank requirements either I don't think in AS2809? I don't know how to word it better – but this may be an issue?		Best addressed by clarifying tank definitions
9.2.2.4.1	Need a definition of Centroid AS2809 defines it as ‘ geometrical centre’ Some definitions define it as COG (too hard to measure)		Changed this to "the height of the geometric centre of the tank" to use the definition in AS 2809
9.2.2.4.3	I read a contradiction to AS2809. Stability of LPG tankers including trailers is 64 degrees (here it is 62) Stability of rigid liquid tankers is 62 degrees (here it is 64) Not sure I am reading this right?		Omission. Have added in "used for the transport of liquefied gases" into (a)
9.2.2.4.5	I thought all Australia was required to for a stability system to trailers?? Is this just in NSW?		Have clarified the note
9.2.2.7.6	Include: An indicator to verify if any valve is open or closed shall be visible to the operator from the ground in an easy to observe location		This is a matter for AS2809
9.2.2.8.2.2	This does not allow for OEM equipment This is not clear if the conduit is sealed or split I believe you reference AS2809 and leave it there and not include this This is still a grey area in our industry and it makes it worse if it is in the code		The provision replicates AS2809
9.2.2.8.6.2	This can not read reconnecting – it is a disconnect function only		The provision has been amended to remove the words 'and reconnecting'

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9.2.3.1	Should reference Hot parts as defined in AS2809 as per lower clause – maybe use hot component for consistency		Have referenced AS 2809 and slightly reworded.
9.2.3.3	This is 125mm in AS2809.1 (clause 1.6.1)		After discussion, this is a different requirement to the hot component distance in AS 2809.2 - which applies to cargo carrying components
9.2.3.5	This is a big change Does this read all tankers carrying any flammable liquids or gasses needs a automatic fire suppression system? This is a big change		Keep - comes from ADR and these systems are available. However, will consider transitional provision for vehicles in use.
9.2.3.5.4	This is saying equipment inside the drivers cab must be haz area approved This is impossible??		The following Note has been added: <i>NOTE: Under AS 2809, the main driver cabin is considered a non-hazardous area during normal operations, provided the cabin doors and windows remain closed during transfer operations.</i>
Terminology	Fire-risk substances not defined (only appears in segregation table)		Fire-risk substances are now defined in a table note for table in 7.5.2.1
Terminology	Use 'aggregate quantity' when referring to the quantity of DG in the load and 'total quantity' when referring to quantities on documentation, e.g. single UN number/PG or total quantity of LQ. 1.1.3.6, 1.1.3.6.3 (x 2), 1.1.3.6.4, 1.1.3.6.4 (Note), 1.1.3.6.5, 1.1.3.6.5 (table column heading and table note b). Use 'total quantity in 3.4.12.1 and 5.4.1.1.1(f)		The draft code now uses aggregate quantity when calculating the quantity of all DG in the load (1.1.3.6). For a single substance (UN number and PG, total quantity is used. See also 3.4.12.1(b)(iii) and 5.4.1.1.1(h)

Class 1	What's changed	What hasn't changed	Rationale for the change
1.1.3.14	Special concessions for low hazard explosives have been introduced to manage explosives that are routinely carried for general use.		Jurisdictions have a variety of exemptions for certain explosives that present a lower hazard, these provisions will aid harmonisation of these requirements.
1.1.4.8	Provisions for containers used for the import and export of explosives have been taken from the AEC and updated.		These are based on provisions in the AEC and provide controls for importers and exporters to observe where full compliance with the ADG Code is not practicable.
1.1.7	Determination of overall load division taken from the AEC. A minor change has been made to one entry (division 1.3 & 1.6 carried together).		Included in supplementary consultation on class 1.
1.1.8	Explosives load categories taken from the AEC, with some modifications. When ammonium nitrate is present, the entire quantity is counted as either division 1.1 or 1.5, regardless of its form. Individual item entries for detonators have been deleted.		Included in supplementary consultation on class 1.
1.8.11	The administrative controls for when an authority may authorize drivers of explosives vehicles have been included here	The specific requirements have not changed.	These are found in the AEC and are included in the Code in the absence of harmonized legislation.
1.10.3	These are provisions for high consequence dangerous goods, where the consequences of an incident are significant. The requirements are primarily focused on the transporter developing a security plan that addresses security requirements for the loads being transported. The requirements are descriptive, not prescriptive.	Competent transport operators will already address these requirements under their standard policies and processes. Licensed explosives or security sensitive ammonium nitrate transporters are deemed to comply with the general security plan requirements, to avoid duplication of provisions with explosives legislation.	Clarity of expectations for code users.

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Chapter 6.16	Construction requirements for load compartments for explosives.	Fundamental requirements haven't changed significantly, but has been reworked.	Provides a single place for construction requirements for explosives load compartments. A specific provision permitting the use of the AEISG code of practice for segregation barriers has been included after consultation.
8.4.3	The parking supervision requirements for MPUs are aligned to those for explosives vehicles.		MPUs are subject to similar security requirements as explosives vehicles under explosives legislation,
8.4.4	Parking and supervision requirements for explosives vehicles have been included here. Explosives vehicles are specifically required to have a journey plan developed in advance and communicated to the driver.	The driver still needs to comply with the parking requirements.	Journey planning can be complex, especially determining stopping locations. This enhances the requirements in the AEC, and ensures that the responsibility is applied to the carrier.
8.5.2	Section 8.5.2 introduces specific requirements for the transport of explosives under the ADG Code.		These requirements are a blend of requirements from the ADG Code and the AEC, and were consulted on as part of the supplementary paper on class 1.
8.6.3	Section 8.6.3 defines the journey planning requirements for MPUs and class 1.	The specific provisions such as distances that are applied	This ensures that journey planning for MPUs and class 1 are undertaken prior to transport, and are not merely left to the driver.
Chapter 9.1	This chapter deals with matters applying to vehicles used for dangerous goods transport generally. It covers scope, definitions, vehicle approvals, inspection and maintenance. This introduces the concept of FL, AT and AN vehicles, particular vehicle types for tank vehicle service. This chapter also introduces requirements for EX and EX3 vehicles for the transport of explosives, and MPUs. The chapter also introduces clearer requirements for inspection and maintenance of all vehicles used for the transport of dangerous goods, and more specific requirements for vehicles that are designed in accordance with AS 2809.1, and vehicles that are used to tow an FL or AT vehicle.		Transparency of requirements, both for competent authorities and code users.
Chapter 9.3	This chapter contains specific requirements for EX and EX3 vehicles, used for the transport of explosives.		These provisions have been consulted on as part of the Class 1 supplementary consultation paper, with some minor modifications to modernize the provisions. EX3 vehicles replaces the concept of a category 3 vehicle from the AEC.
9.3.4.5	Electrical installation requirements carried over from the AEC		These were unintentionally omitted from the class 1 supplementary paper, and were included in the post-paper consultation work program.
9.3.4.6	The additional firefighting requirements included in the WA ammonium nitrate explosion risk goods code have been applied to EX3 vehicles.		Was consulted on as part of the class 1 supplementary paper.
Chapter 9.8	This chapter contains construction requirements for MPUs.		This is based on the requirements of ADR and the AEISG MPU Code of Practice, and was consulted as part of and after the class 1 supplementary paper.