**mainfreight response to draft adg code and ris**

**General Comments**

Please find below comments on the items that involve the proposed changes (that affect Mainfreight) to the current code.

Mainfreight’s involvement with DGs goes back many years and involves both our General Transport Division and our Chemcouriers Chemical Transport Speciality Division.

Mainfreight specialises in packaged DG road transport so by necessity comments will be restricted to that sphere of operations.

Overall, Mainfreight welcome the proposed simplification/realignment of the ADG Code. The changes, once embedded in our organisation, will simplify operations. Additionally, any simplification will benefit to workforce where a significant proportion of that workforce either face challenges with language, literacy and numeracy or do not have English as first language.

The changes will bring challenges, specifically with respect to training/upskilling of the workforce and overcoming inertia but in the end will be worthwhile.

Mainfreight agree that Option 4 as presented in the RIS would be the appropriate way forward.

**Specific Comments**

1. Comment from our Chemcouriers branch managers is that they would not like to see any changes to the current marking of IBCs. General feeling was that the current marking gave good information about a given chemical if the IBC was damaged or leaking, very helpful for the clean-up. It was felt that this outweighed any gains in efficiency. This point is balanced with other comments later in this report.
2. The exemption for short journeys needs to be tightened. The feedback from the branches was that it was too open to interpretation by the driver and if an incident occurred, Mainfreight could be in a very grey area legally.
3. The question was raised amongst out team if the code could be expanded to make the existing explosives code redundant. There are inconsistencies between the two and it be a gain in efficiency for there to be one combined code. For example, the requirements around placarding 1.4S and the inconsistencies associated with this.
4. Mainfreight agree with the argument to delete AU 01. As it exists it causes a level of confusion with our drivers and loaders as to when the provision applies and when it doesn’t. As pointed out in the RIS if spilled into a local waterway, materials such as UN 3082 and UN 3077 can cause a significant incident. Having these material reclassified would go some way to providing the emergency services with extra information at the scene of the incident.
5. The proposal to have Dangerous Goods Safety Advisors made compulsory was deemed to be sound. Mainfreight have “Dangerous Goods Coordinators” at each branch, and these have been a valuable resource in providing advice and intervention in situations where dangerous goods were compromised. In saying that, consideration would need to be given to training, the legal standing of that training if conducted in house and the legal implications of advice from a DGSA being ignored.
6. The recommendation to include the insurance cover in the draft code was looked on favourably. Having this information in one place and not split into State Regulations would make the information easier to access. Without reaching a conclusion, there was discussion within Mainfreight as to whether $5,000,000 was still adequate in todays’ economic environment.
7. Mainfreight support the proposed changes to the DG List.
8. Question 1. Having the regulatory information in one location makes the information easier to access and reduces the probability of error.
9. Question 2. See point 5 above.
10. Question 3. Mainfreight have basic security protocols in place for the transport of DGs. Mainfreight avoid the transport of HCDGs and have not developed an enhanced security program as such. This would obviously change if the decision was taken to transport these materials.
11. Question 4. This has not been explored.
12. Question 5. Looking at the list of impacted DGs listed, we rarely transport these materials so have little data to add at this point.
13. Question 6. Given we rarely transport these materials we are unable to quantify any cost savings
14. Question 7. Given what Mainfreight transport, all issues have been identified.
15. Question 8. Not applicable to Mainfreight.
16. Question 9. UN 3077 and UN 3082 materials Mainfreight transport are agricultural chemicals. Mainly herbicides and some stock nutrition products.
17. Question 10. Mainfreight believes that the impact would be minimal.
18. Question 11. This change would affect about 20% of our chemical movements.
19. Question 12. Enough information is currently unavailable to do this. Mainfreight can undertake further research on this topic if the committee decide it is worthwhile.
20. Questions 13 to 16. To some extent, Mainfreight is not affected by this change. This is more of an issue for the customers who provide our packaged DGs. The only impact would be if we detected that a customer wasn’t using the correct packaging, we would not be able to load that material. This would require an upgrade in internal training to allow our loaders et al to detect any non-conformances with packaging.
21. Questions 17 to 19. We do not transport these materials.
22. Question 20. Mainfreight has no objection to the inclusion of waste trucks into the code. It is relevant given that a significant quantity of industrial waste is classified as DG.
23. Question 21. If the requirement for reflective placards is moved from the draft into the final version of the code, then given the current stock still in the system, we believe that a minimum of two to three years would be required for the transition.
24. Question 22. Mainfreight are 50:50 with the removal of EIPs from IBCs. Our operations teams can see the benefits in deleting this requirement but there was the emergency response aspect mentioned in point 1 to consider.
25. Question 23. Mainfreight are assuming this will replace the current TERP document. From our perspective there would not a significant gain as our current TERP covers all the requirements listed in 5.4.3.1. Noted the change in safety equipment requirements. The deletion of the eSCBA is a welcome change due to the cost and relatively little use this equipment gets.
26. Question 24. Mainfreight have no further comment.
27. Question 25. Not applicable to Mainfreight.
28. Question 26 and 27. Mainfreight support the changes to segregation devices. We don’t foresee any real impact on our operations.
29. Question 28, Mainfreight have no further comment.
30. Questions 29 and 30. Mainfreight anticipate no real impact on our operations as we only use closed or sheeted vehicles, not open vehicles.
31. Questions 31 and 32. Anticipate no impact on our operations. The only CV Code that would impact Mainfreight would be CV 12, specifically UN 1950 and Mainfreight are already in line with the draft change.
32. Questions 33 and 34. Mainfreight agree that the use of partitions be permitted to achieve segregation but agree with the proposal that it should only apply to solids and powders. Liquids need to be segregated using more robust means due to the flow characteristics of liquids.
33. Questions 35 and 36. Mainfreight have not taken advantage of the current ability to use load restraint curtains as gates are still Mainfreight’s preferred means of load protection. Mainfreight would only agree to do away with gates if the load was fully restrained as per the Load Restraint Guide 20918. Our customers, drivers and loaders would require ongoing education in this concept.
34. Questions 37 and 38. Mainfreight agrees with the proposed changes to this part of the draft code, as it crystallises requirements placed on drivers and operators more clearly than the existing code.
35. Questions 39 and 40. Does not directly impact on Mainfreight.
36. Questions 41, 42 and 43. Does not apply to Mainfreight as we do not transport diesel fuel.
37. Questions 44 and 45. Mainfreight does not transport fuel, so we offer no comment on these questions.
38. Questions 46. 47 and 48. Mainfreight only transport Class 1.4S explosives and have no plans to expand beyond Class 1.4S. The items discussed in these questions are not directly applicable to Mainfreight.
39. Questions 49 and 50. Mainfreight do not undertake transport of explosives in tanks or IBCs.
40. Questions 51 and 52. Mainfreight are of the opinion that more detailed transitions for equipment phase out is desirable as it would give more certainty than currently exist in the current code.
41. Questions 53 and 54. Mainfreight do not transport DG Class 6.2 so have no position on the proposed change.
42. Question 55. Mainfreight do not transport DG Class 6.2 so have no position on the proposed change.
43. Question 56. Mainfreight only transport small quantities of toxic and corrosive gases. However, in saying that, we would be more comfortable with a lower threshold, the ADR figure seems a reasonable compromise.
44. Question 57. Mainfreight only transport DG Class 5.2 with an SADT of 60 degrees or higher. So have no position on the proposed change.
45. Question 58. Mainfreight transport a significant volume of aerosols. Most are at the lower end of the risk scale but would support a lower threshold for higher risk aerosols. The ADR approach seems a reasonable compromise.
46. Question 59. Mainfreight are of the belief that having the transport categories available in the DG list from Section 3 would be useful in determining what constitutes a small load.
47. Question 60. Mainfreight are of the opinion that the exemptions and inclusions in Tables (a) and (b) of Section 1.1.3.6.6 are adequate as they stand and recommend no further changes. It is important that the concessions/requirements in these table be kept as is, especially for our customers and sub-contractors who may not have the inhouse DG knowledge available to larger transport organisations.
48. Question 61 and 62. Mainfreight are of the opinion that the current listing for “0” and “unlimited” thresholds are adequate and do not need to be altered.
49. Question 63. Mainfreight support the current licencing arrangements for DG drivers. It provides certainty that the driver has the DG knowledge required to safely transport DGs in bulk. However, Mainfreight is of the belief that some of the providers of the 2-day bulk drivers licence course vary significantly in the quality of delivery. We have seen some drivers who have done the bulk drivers’ course with certain providers and feel that the level of training and knowledge the drivers have received has been substandard.
50. Question 64. Mainfreight do support DG training for drivers where a bulk licence is not required. We currently provide inhouse DG training for drivers but some nationally recognised guidance on training content, especially for smaller, lesser resourced transport operators would be useful.
51. Question 65. Mainfreight support a notification scheme for vehicles not requiring a licence. This would help with vehicle legal compliance.
52. Question 66. We estimate that we would need to train around 800 to 900 team members in the new provisions of the draft if all the changes outlined in the draft were passed into regulation. Costs this far out from any training required are difficult to quantify. In Mainfreight’s case, the training can be done inhouse, but there would be costs incurred in the time lost from branch work, costs incurred in interstate travel (flights and accommodation) and resources allocated to train the trainer sessions to deliver the training to an appropriate standard.
53. Question 67. Unable to give an accurate estimate on the cost to upgrade our systems to work with the changes to the code. The undertaking would be significant as it would involve changes to our customer portal (Freman Web) and our entire consignment system (Mainstreet, DG document generation and the like) as well as scanning wands used on the depot floor.
54. Question 68. See previous answer.
55. Question 69. Any one-off costs are again difficult to quantify this far out from the implementation date. Training would be an obvious one as are the changes required to systems and documentation (DG Documents, checklists and the like). There would also be a potential cost in upgrading scanning equipment plus hardware such as placards if the reflective placards recommendation is accepted.
56. Question 70. On reviewing Table 16 in the RIS, the changes that would benefit the freight profile of Mainfreight are SP 598 (currently scoping the possibility of transporting end of life lead – acid batteries), the proposal to remove AU01 and potentially the removal of EIPs from IBCs (comment at Point 1 notwithstanding). Cost benefit data for Mainfreight not available currently but can be researched if required.
57. Question 71. See answer to question 66.
58. Question 72. See answer to question 67.
59. Question 73. Unable to provide an accurate estimate this far out from the proposed regulations being implemented. However, costs could be amortised if a sufficient period was allowed to change some of the dry chemical units to foam or water-based extinguishers. In addition, the total number of extinguishers required for the business would need to be reassessed considering the proposed changes.
60. Question 74. Cost savings for changing from eSCBA units to air purifying respirators would be significant. We currently spend $800 to $1,000 for an eSCBA unit. When this is compared to the cost of an air purifying respirator and cartridges (c-$250) there is a significant difference. There is a hidden cost in training drivers to use and more importantly maintain the respirators (cartridge life, respirator cleaning and cartridge exposure).
61. Question 75. Other one-off costs would be hard to quantify at this point. Once the draft changes have been ratified and we know what exactly we are facing then some empirical data can be provided.
62. Question 76. Table 18 outlines several proposed changes. The main changes that will benefit Mainfreight (in addition to those already discussed in previous questions) are the requirement to no longer have to provide a copy of the TERP to the emergency services, the proposed flexibility in design criteria for segregation devices, the flexibility in vehicle design, stacking of aerosols and the provision of instructions in writing rather than the full TERP, although as pointed out earlier our current TERP would meet the instruction requirement. The instruction requirement would be more of benefit to smaller, less well resourced operators.
63. Question 77. Not applicable to Mainfreight.
64. Questions 78 and 79. Not applicable to Mainfreight.
65. Questions 80 and 81. Not applicable to Mainfreight.
66. Question 82. Answers to the topics raised in this question can be provided on request.