



# Dangerous Goods Safety Matters

## Self-audit guide for prime contractors

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Government of **Western Australia**  
Department of **Mines and Petroleum**  
Resources Safety

## Introduction

Prime contractors have multiple responsibilities to ensure that dangerous goods are transported safely. This self-audit tool is a good starting point to evaluate your transport system.

## Why is self-auditing important?

Ensuring occupational safety within your consignment and transport operations for dangerous goods is a primary responsibility of prime contractors. Self-auditing is a “health check” for your business that should enable you to identify gaps and take effective corrective actions.

## Using this self-audit tool

The sections of this self-audit align with Department of Mines and Petroleum’s *Six Pillars of Dangerous Goods Transport* strategy. They address a selection of regulations concerning prime contractors.

Where deficiencies are identified by a prime contractor, it is recommended that they are rectified internally in your quality management system.

You should familiarise yourself with the applicable regulations and codes.

## Legislation

- *Dangerous Goods Safety Act 2004*
- Dangerous Goods Safety (Road and Rail Transport of Non-explosives) Regulations 2007

## Guidance

Available from the National Transport Commission  
[www.ntc.gov.au](http://www.ntc.gov.au)

- Australian Dangerous Goods Code (ADG 7.3)
- Load Restraint Guide (LRG)

Available from Standards Australia, [www.standards.org.au](http://www.standards.org.au)

- HB 76 *Dangerous goods initial emergency response guide*
- AS 1678 *Emergency procedure guide – Transport*

## Scope of audit

This tool applies to the transport of packaged dangerous goods, not road tanker operations. Use the self-audit if transporting:

- packages less than 500 kg (or litres) capacity (e.g. 200 L drums, 25 L pails, 25 kg bags, cylinders, batteries)
- placardable units (e.g. IBCs, pressure drums, manifold cylinder packs, portable tanks).

## Audit sections

- Instruction and training
- Packaging
- Segregation
- Restraint
- Safety equipment and vehicle safety
- Placarding
- Transport documentation

## Verification activities

Verification is important to ensure compliance with the Dangerous Goods Safety (Road and Rail Transport of Non-explosives) Regulations 2007.

Some things you can do as part of the verification process are listed below.

- Staff interview – drivers, trainers, loaders, schedulers, maintenance
- Packaging suitability
- Vehicle loading arrangement
- Vehicle inspection (e.g. gates, twist locks, dunnage, straps)
- Maintenance practice
- Placarding practice
- Consignment system review – use
  - Australian Standards HB 76 and AS 1678
  - transport document
  - consignment notes, bill of lading, retained for three months

No.	Requirements of DG transport regulations	Audit questions	Adequate? (Y/N)	Corrective actions
<b>Instruction and training [r. 14]</b>				
1.	A person must not manage, control or supervise a task unless the person has <b>received instruction and training</b> to enable him or her to manage, control or supervise another person to perform the task safely and in accordance with these regulations.	<ul style="list-style-type: none"> <li>• What management system is in place for delivering training?</li> <li>• What training and assessment program is used?</li> <li>• Is the training course delivered by a competent person with relevant industry background?</li> <li>• What training qualifications do the trainers hold?</li> <li>• Are staff competencies recorded in a training matrix on a live database or spreadsheet?</li> </ul>		
2.	A person who is responsible for management or control of a task must not employ, engage or permit another person to perform the task if the other person — (a) has not received, or is not receiving, <b>appropriate instruction</b> and training to ensure that he or she is able to perform the task safely and in accordance with these regulations; or (b) is not <b>appropriately supervised</b> in performing the task to ensure that he or she is able to perform the task safely and in accordance with these regulations.	Does the training cover competencies for each of these elements? <ul style="list-style-type: none"> <li>• packing, labelling and marking of dangerous goods</li> <li>• consigning dangerous goods</li> <li>• loading dangerous goods</li> <li>• unloading dangerous goods</li> <li>• handling fumigated cargo transport units</li> <li>• marking and labelling packages and overpacks</li> <li>• placarding placard loads</li> <li>• preparing transport documentation</li> <li>• maintaining vehicles and equipment used in the transport of dangerous goods</li> <li>• driving a vehicle transporting dangerous goods</li> <li>• being the consignee of dangerous goods</li> <li>• following appropriate procedures in accordance with regulations in a dangerous situation</li> </ul>		

No.	Requirements of DG transport regulations	Audit questions	Adequate? (Y/N)	Corrective actions
<b>Packaging - general [r. 66] and other [r. 74]</b>				
3.	<p>A prime contractor must not transport dangerous goods in any <b>general packaging</b> if the prime contractor knows, or ought reasonably to know, that the packaging is <b>damaged or defective</b> to the extent that it is not safe to use to transport the goods.</p> <p>A prime contractor must not transport dangerous goods in any <b>other packaging</b> provided by any other person if the prime contractor knows, or ought reasonably to know, that —</p> <p>(a) the <b>packaging is unsuitable</b> for the transport of the goods; or</p> <p>(b) the goods have not been packed in the packaging in accordance with any relevant provision of the ADG Code Part 4.</p>	<ul style="list-style-type: none"> <li>• Are consigned packages checked to confirm UN approval?</li> <li>• How is defective or leaking packaging identified?</li> <li>• What system is in place to handle and safely deal with defective or leaking packaging?</li> <li>• What evidence is needed to accept placardable units, portable tanks, MEGCs and freight containers as suitable for transport?</li> <li>• How are defective containers identified and handled?</li> </ul>		
<b>Segregation [r. 134]</b>				
4.	<p>A prime contractor must not use a road vehicle to transport dangerous goods if the prime contractor knows, or ought reasonably to know, that —</p> <p>(a) the vehicle is, in the same journey, transporting <b>incompatible goods</b>; and</p> <p>(b) the dangerous goods are <b>not segregated</b> from the incompatible goods in accordance with the ADG Code Part 9.</p>	<ul style="list-style-type: none"> <li>• Is there a system in place to prevent incompatible loads being consolidated?</li> <li>• How are incompatible goods managed when received from multiple consignors?</li> <li>• How do you deal with a customer's consolidated shipment that contains incompatible goods?</li> <li>• How are loads in a multi-trailer combination accepted as being compatible?</li> <li>• How are packaged loads segregated?</li> <li>• How are placardable units segregated?</li> <li>• Are freight containers, suitable Type I segregation devices or approved Type II segregation devices used?</li> <li>• Do vehicle loading procedures specify appropriate use of segregation devices?</li> </ul>		

No.	Requirements of DG transport regulations	Audit questions	Adequate? (Y/N)	Corrective actions
<b>Restraint [r. 128]</b>				
5.	<p>A prime contractor must not transport <b>in or on a vehicle</b> a load that contains dangerous goods and that is a placard load if the prime contractor knows, or ought reasonably to know, that the goods or their packaging have not been stowed or loaded, or are <b>not restrained</b>, in accordance with the ADG Code Chapter 8.1.</p> <p>A prime contractor must not transport dangerous goods <b>in or on a cargo transport</b> unit if the prime contractor knows, or ought reasonably to know, that the goods or their packaging are <b>not restrained</b> in accordance with the ADG Code Chapter 8.2.</p>	<ul style="list-style-type: none"> <li>• What system ensures that restraint of packages and cargo transport units is appropriate?</li> <li>• What procedures ensure placardable units are restrained appropriately?</li> <li>• What procedures ensure cargo transport units are restrained appropriately?</li> <li>• How are storage and restraint principles from the Load Restraint Guide enforced?</li> <li>• Are suitably rated restraint equipment and dunnage available for selection by loaders and drivers?</li> <li>• How is suitably rated restraint equipment inspected and maintained?</li> <li>• What load restraint training is provided to loaders and drivers?</li> <li>• Is the training delivered by a competent person with relevant industry background?</li> </ul>		
<b>Safety equipment [r. 164] and vehicle safety [r. 119]</b>				
6.	<p>A prime contractor must not use a road vehicle to transport a placard load if the road vehicle is not equipped with</p> <p>(a) fire extinguishers (FFE) and portable warning devices that comply with the ADG Code Part 12; and</p> <p>(b) any other equipment required under that Part.</p> <p>FFE must be inspected or tested in accordance with the ADG Code Part 12 and AS 1851 <i>Routine service of fire protection systems and equipment</i></p> <p>A prime contractor must not use a vehicle to transport dangerous goods if the vehicle or its equipment does not comply with the ADG Code Chapters 4.4 and 6.9.</p>	<ul style="list-style-type: none"> <li>• What system is used to select, maintain &amp; service FFE?</li> <li>• How is personal protective equipment (PPE) selected for high hazard dangerous goods (e.g. toxic gases, Class 8, Class 6.1)?</li> <li>• Are drivers allocated an individual PPE kit bag?</li> <li>• How are drivers deemed competent in PPE and FFE use?</li> <li>• Is the load scheduler tasked to ensure adequate provision of safety equipment and PPE?</li> <li>• What system manages preventative maintenance for vehicles and equipment?</li> <li>• How are vehicle defects or equipment faults formally reported by drivers or loaders?</li> <li>• Is the system for priority ranking and timely repair of vehicle defects adequately managed?</li> </ul>		

No.	Requirements of DG transport regulations	Audit questions	Adequate? (Y/N)	Corrective actions
7.	<p><b>Placarding [rr. 109, 114]</b></p> <p>A prime contractor must not transport goods in a package if the prime contractor knows, or ought reasonably to know, that —</p> <p>(a) the goods are dangerous goods; and</p> <p>(b) the package is not <b>appropriately marked</b> or the load is not <b>appropriately placarded</b>.</p> <p>A prime contractor must not transport dangerous goods in a package if the prime contractor knows, or ought reasonably to know, that a marking or label on the package about its contents or placarding of the load is <b>false or misleading</b> in a material particular.</p>	<ul style="list-style-type: none"> <li>• Do you check the labelling of packages and overpacks against the consignor’s paperwork?</li> <li>• How do you ensure that overpacks (e.g. packages on a shrink-wrapped pallet) are correctly labelled?</li> <li>• What procedure is in place for placarding vehicles transporting a load of packages and IBCs?</li> <li>• How are multi-trailer combinations of mixed classes of packages and IBCs handled?</li> <li>• Do you check the accuracy and legibility of emergency information panels for placardable units?</li> <li>• What procedure ensures vehicles are correctly placarded for transporting placardable units?</li> <li>• How is placarding of multi-loads of IBCs and portable tanks managed?</li> <li>• Are vehicles equipped with materials to enable a driver to create or amend placards during a journey?</li> </ul>		

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8.	<p>A prime contractor must ensure that a person does not drive a road vehicle used by the prime contractor to transport dangerous goods if —</p> <p>(a) the person has not been given <b>transport documentation</b> that complies with the ADG Code Chapter 1.1 for the goods; and</p> <p>(b) the documentation is not readily able to be located in the vehicle in accordance with the ADG Code Chapter 1.1.1.</p> <p>A prime contractor must not use a road vehicle to transport a placard load if —</p> <p>(a) the road vehicle is not equipped with an <b>emergency information holder</b> that complies with the ADG Code Chapter 11.2; or</p> <p>(b) the required emergency information is not in the holder.</p> <p>The prime contractor must <b>retain</b> the document, or a copy of the document, for at least <b>3 months</b> after the transport of the dangerous goods by the prime contractor finishes.</p>	<ul style="list-style-type: none"> <li>• What consignment system is in place for generating and consolidating transport documentation?</li> <li>• Does your company transport document template satisfy the ADG Code criteria?</li> <li>• Does the consignment system manage <ul style="list-style-type: none"> <li>– limited quantity?</li> <li>– retail distribution?</li> <li>– empty containers?</li> </ul> </li> <li>• What are the processes, requirements and limits for retail distribution loads?</li> <li>• How are multiple consignments for a single vehicle load managed?</li> <li>• Does the transport documentation clearly identify which dangerous good is on which trailer?</li> <li>• What system is used to provide emergency information with each load?</li> <li>• What checking ensures relevant emergency procedure guides are received from consignors?</li> <li>• How are the emergency information holders arranged in the vehicle cabin?</li> <li>• Does your consignment system retain a copy of the transport documents issued for each trip?</li> <li>• Can transport documents be retrieved from your system?</li> </ul>		











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