Dangerous goods information sheet

Transport of dangerous goods – National Amendment Package No. 2

Introduction

The national Transport of Dangerous Goods Amendment Package No. 2 from the National Transport Commission (NTC) took effect in Western Australia on 1 July 2014 with the gazettal of amendments to the Dangerous Goods Safety (Road and Rail Transport of Non-explosives) Regulations 2007 (the Transport Regulations).

The single-most significant initiative of the Amendment Package is the implementation of an updated version of the Australian Code for the Transport of Dangerous Goods by Road and Rail (called edition 7.3, ADG7.3), which replaces the seventh edition (ADG7). The amendments contained in ADG7.3 must be fully complied with by 1 July 2015.

Other regulatory changes took effect on 1 July 2014 without a transition period because they are minor and did not pose an additional cost to industry.

This information sheet summarises the Amendment Package, highlighting:

- those issues most relevant to industry
- enforcement issues relevant to the safety regulator
- improvements that clarify the intent of the code and Transport Regulations.

The information sheet does not cover minor issues, the updating and re-naming of existing terms and definitions, nor the correction of errors.

Australian names phased out

Table 3.2 of ADG7 allowed the use of alternate uniquely Australian shipping names for certain United Nations entries named in Chapter 3.2 Dangerous Goods List, but only for land transport within Australia.

Table 3.2 and clause 3.2.5.3 have been amended in ADG7.3. Table 3.2 has left out all Australian “[AUST.]” entries that Note F flagged as “should be phased out”, and these will not be permitted after 1 July 2015. They are:

- Ethylene Glycol Dimethylether [Aust.] of UN 2252
- Methylene Chloride [Aust.] of UN 1593.

Amendment to special provision AU03 – Transport of unodourised LPG

In ADG7, special provision AU03 prohibited the transport of unodourised LPG unless exempted by the relevant Competent Authority (section 3.3.3). Requests for such exemptions were made frequently and Competent Authorities gave exemptions subject to strict conditions. It was decided to eliminate the administratively cumbersome exemption process by allowing the transport of unodourised LPG subject to certain safety conditions, which are now part of AU03 in ADG7.3:
Unodourised LP Gas may only be transported if each of the following conditions is met:

(a) each route used for the transport must have been determined by an appropriate risk management assessment; and

(b) each load must be accompanied by a gas detector suitable for the detection of LP Gas, in accordance with AS 1596, and by a person trained in its operation; and

(c) that person must use the gas detector to check for the presence of LP Gas in the vicinity of the load at each routine stop that the vehicle makes, and on any other occasion when there is a significant risk that LP Gas may have leaked, and must record in writing the details of each test; and

(d) the word "Unodourised" must be included as part of the shipping name displayed on vehicle emergency information panels; and

(e) a copy of the Transport Emergency Response Plan must be provided to the relevant hazmat incident combat agency before the journey commences.

This provision does not apply to South Australia. The transport of unodourised LP Gas is prohibited in South Australia unless exempted by the Competent Authority in South Australia.

**New guidelines for underslung segregation devices**

Under ADG7.3, as previously for ADG7, dangerous goods of Packing Groups II and III may be transported with incompatible goods, where the incompatible dangerous goods are packed in a segregation device or in some other method of segregation approved by the Competent Authority.

Segregation devices fitted below the main load area (i.e. underslung segregation devices) without a Competent Authority approval may be used where they meet the definition of a Type 1 device as set out in section 6.11.3.

Specific approval by the Competent Authority is required for any proposed underslung segregation device that does not comply with Type 1 criteria (e.g. capacity greater than 450 litres, or of unusual construction or form of attachment).

ADG7.3 contains a new section 6.11.7 that gives guidelines on the design and approval for all (non-Type 1) underslung segregation devices.

<table>
<thead>
<tr>
<th>6.11.7</th>
<th>NON-TYPE 1 UNDERSLUNG SEGREGATION DEVICE</th>
</tr>
</thead>
<tbody>
<tr>
<td>6.11.7.1</td>
<td>Any proposed underslung segregation device (which is not a Type 1 device) submitted for approval must comply with the requirements in this subsection and must be approved by the Competent Authority.</td>
</tr>
</tbody>
</table>

**6.11.7.2 Design and construction requirements**

| 6.11.7.2.1 | The device must be designed to a maximum design load and be built with sufficient strength and rigidity to transport the maximum design load without failure or such distortion as would compromise any of the device's function or features. |
| 6.11.7.2.2 | The device must be fitted with a permanently attached door and be liquid tight. |
| 6.11.7.2.3 | The device must have a door fitted with at least 2 securing devices and be capable of being locked against unauthorised access. |
| 6.11.7.2.4 | The device must be permanently attached to the vehicle to withstand a 2g force in any direction when loaded to its maximum design load. |
| 6.11.7.2.5 | The device must have a smooth interior free of any protrusion or fitting likely to damage packages within. |
6.11.7.2.6 The device must be easy to clean and free from cavities where spillage or dirt or contaminants might collect.

6.11.7.2.7 The device must have a means of draining any liquid from the device which may accumulate due to leakage of any contents. When the device is in use the drainage facility must be tightly sealed.

6.11.7.2.8 The device, including supports and attachments, must have a ground clearance of at least 350 mm and not project beyond the perimeter of the vehicle.

6.11.7.3 Application for approval

6.11.7.3.1 An application for the approval of a Competent Authority of a proposed underslung segregation device must be in writing and must include:
   (a) a full description of the device;
   (b) details of the dimensions, volumetric capacity and maximum design load (kg) of the device;
   (c) signed detailed drawings of the device;
   (d) details of the materials used in the device;
   (e) details of the construction of the device;
   (f) details of how the device is to be attached to the vehicle;
   (g) any other information necessary to enable an assessment of whether the device complies with 6.11.7.2.

6.11.7.4 Approval number to be displayed

6.11.7.4.1 An approved underslung segregation device must be clearly and permanently marked, in a conspicuous position, in lettering not less than 25mm high with the following:
   (a) for a device approved by a Competent Authority:
      Name of Competent Authority
      APPROVED SEGREGATION DEVICE
      FOR USE IN (State/Territory) ONLY
      APPROVAL XXX DESIGN LOAD YYY
   (b) for a device approved by the Competent Authorities Panel:
      AUSTRALIAN COMPETENT AUTHORITIES
      APPROVED SEGREGATION DEVICE
      FOR USE IN AUSTRALIA ONLY
      CAP REFERENCE CA20--/--
      DESIGN LOAD YYY
      where XXX is the approval number issued by the Competent Authority and YYY is the maximum weight, in kg, that the device may carry.*

Ventilation of flammable and toxic gases and oxygen

Under ADG7.3, as previously for ADG7, Section 7.1.4.5 contains the requirement to ventilate transport units and compartments to prevent the build-up of vapours that are likely to increase risk whenever transporting a placard load of any flammable or toxic gases, or oxygen, or gases with a flammability as a subsidiary risk. This requirement is somewhat subjective.
Closed vehicles fitted with roof vents are often used to transporting flammable gases. However, roof vents are not sufficient for good ventilation. Some flammable gases tend to sit in the lower parts of transport units. For example, there have been incidents where tradesmen’s vans carrying welding equipment have exploded. It is important that additional venting allows air circulation through the lower parts of closed vehicles. Consequently, the following text has been added to section 7.1.4.5 in ADG7.3:

The ventilation must produce a flow of air that circulates throughout the unit or compartment, in particular through the highest and lowest parts of the unit or compartment, and must provide for the air to be released from the unit or compartment after it has circulated. However the requirements in the previous sentence do not apply in the case of a shipping container that is being used:

(a) to import those goods if appropriate measures are taken to check for vapours before the container is opened, and to be able to deal, when the container is opened, with any build-up of vapours that may have occurred; and

(b) to export those goods if the container will be accepted for carriage by sea or air without needing to comply with those requirements.

Transfer of bitumen from moving vehicle

A general requirement covered by section 10.2.3 of ADG7 prohibits the transfer of dangerous goods (liquids and gases) into or out of a moving vehicle. An exemption from section 10.2.3 was granted by the Competent Authorities Panel that permits the transfer of bitumen to road-making equipment where the vehicles are coupled together and moving. This exemption has been incorporated into an additional clause 10.2.3.7 in ADG7.3 to allow this practice without an exemption:

10.2.3.7 Despite 10.2.3.1 and 10.2.3.3, if a bitumen tank vehicle is coupled with road-making plant, bitumen may be transferred between the vehicles by a connecting hose while the vehicles are in motion and while the cabins are occupied. However the tank vehicle drive away protection system required by AS 2809 may only be overridden by the road-making plant coupled to the bitumen tank vehicle to allow the coupled units to be moved.

Ullage requirements for vacuum tankers do not apply

It has been recognised that it is not practical to enforce ADG7’s ullage requirements for vacuum tankers. Following an exemption by the Competent Authorities Panel, it was decided to extend the exemption generally as follows:

The phrase or to waste dangerous goods transport in vacuum tank vehicles has been inserted in ADG7.3 at the end of clause 10.3.1.2.3.

Note: Ullage is the unfilled space in a container.

Maximum permitted filling ratio for tank vehicles with gases in a liquefied form

The filling ratio is the ratio of the mass of gas to the mass of water at 15°C that would fill completely a pressure receptacle fitted ready for use.

In order to prevent overfilling and overpressures in tanks for non-refrigerated liquefied gases the maximum filling ratio required by section 10.3.2 of ADG7 must not be exceeded. However, an exemption was granted by the Competent Authority Panel allowing a filling ratio for propane of 0.45 for tank vehicles with a capacity greater than 5,000 L.

This exemption should apply generally and therefore it has been placed into ADG7.3, with clause 10.3.2.1 now reading:

The maximum permitted filling ration for a tank vehicle containing dangerous goods of Class 2 in a liquefied form (other than refrigerated liquid) is:
(a) for goods covered under AS/NZS 1596, as specified in the filling instructions set out in that Standard;

(b) for tank vehicles with a capacity of 5,000 L or more transporting propane, 0.45, as determined in accordance with Table 2.1 of AS 2809.3;

(c) in all other circumstances, the relevant ratio specified in Portable Tank Instruction T50 in Chapter 4.2;

(d) if paragraph (c) applies but no ratio is specified in Portable Tank Instruction T50 – the ratio determined by a Competent Authority in relation to goods of that type when transferred into a tank of that type.

**Transport documents need to be in the emergency information holder**

Under ADG7.3, as previously for ADG7, Chapter 11.1.4 specifies that transport documents need to be carried in a specially fitted emergency information holder. This requirement needed further clarity, which was achieved by amending regulations 152 and 154 of the Transport Regulations.

Two clauses were also added to ADG7.3:

<table>
<thead>
<tr>
<th>Clause</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>11.1.4.4</td>
<td>Despite 11.1.1.1, the documentation must be of a size, and be in a form, that is suitable for carrying in the emergency information holder.</td>
</tr>
<tr>
<td>11.1.4.5</td>
<td>The documentation must not be in a sealed envelope, or be otherwise kept in a way that would prevent it from being able to be read by the driver, while it is in the vehicle.</td>
</tr>
</tbody>
</table>

**Fire extinguishers**

**Maintenance of fire extinguisher**

Clause 12.1.2.3 of ADG7 required fire extinguishers to comply with the general requirements for portable fire extinguishers under AS/NZS 1841.1 and with requirements for classification, rating and performance testing under AS/NZS 1850.

ADG6 also referenced the current Australian standard for the maintenance of fire protection equipment (AS 1851). This was not referenced under ADG7.

A new provision in ADG7.3 adds a reference to AS 1851 at clause 12.1.2.3(a).

**Omission of references to irrelevant standards**

Clause 12.1.2.3(b) of ADG7 referred to various parts of AS/NZS 1841 with which a fire extinguisher must comply.

AS/NZS 1841.6 and 1841.7 relate to carbon dioxide type and vaporising liquid type fire extinguishers. However, Table 12.1 of ADG7 only requires dry powder and foam type extinguishers to be carried when transporting dangerous goods. References to AS/NZS 1841.6 and 1841.7 are therefore irrelevant and have been removed from ADG7.3.

**Location of fire extinguishers**

Clause 12.1.2.5 of ADG7 sets out the number of fire extinguishers required on a vehicle and where they should be located.

There have been numerous requests from industry for clarification of the fire extinguisher location. Table 12.1 in ADG7 used the terms *near driver’s door* and *cabin* to describe the required location. These terms are imprecise without a further explanation. There was agreement by Competent Authorities on how these terms should be interpreted, with amended and new provisions in ADG7.3 giving effect to that agreement.
One clause was amended:

Clause 12.1.2.5.4(b) was substituted by *in the cabin for all other vehicles*.

and a clause was added:

| Clause 12.1.2.5.5 | If 12.1.2.5.4 or Table 12.1 requires that a fire extinguisher be located in the cabin, as an alternative to being located in the cabin the fire extinguisher may be located directly behind the cabin or may be mounted on the rear of the cabin. |

Table 12.1 in ADG7.3 now reads:

**TABLE 12.1 MINIMUM FIRE EXTINGUISHER REQUIREMENTS FOR ROAD VEHICLES TRANSPORTING A PLACARD LOAD OF DANGEROUS GOODS**

**Load: All types of dangerous goods**

Packed in:

- packages, drums, overpacks, segregation devices
- intermediate bulk containers (IBCs) containing non-flammables – any quantity
- IBCs containing flammables with up to (and including) 10,000 L capacity or containing up to (and including) 10,000 kg in total

Required extinguishers:

- 1 x 30B dry powder that is to be placed in the cabin (see 12.1.2.5.5), or at the front of any trailer transporting a placard load

**Load: Non-flammable goods**

Packed in:

- pressure drums
- tubes
- multiple element gas containers (MEGCs)
- tanks
- bulk containers (solids)

Required extinguishers:

- 1 x 60B dry powder or 2 x 30B dry powder in the load area
- 1 x 10B dry powder in the cabin (see 12.1.2.5.5)

**Load: Flammable goods**

Packed in:

- pressure drums, tubes, MEGCs, tanks, bulk containers (solids)
- IBCs > 10,000 L capacity or containing >10,000 kg

Required extinguishers:

- 2 x 60B dry powder, or 1x 80B dry powder and 1 x 20B foam, in the load area
- 1 x 10B dry powder in the cabin (see 12.1.2.5.5)

*Note 1: In this table "flammable goods" means dangerous goods of Division 2.1, Class 3 or Class 4, or having a subsidiary risk of 2.1, 3 or 4.  
Note 2: In cases of combination vehicles, these directions apply to every separate trailer transporting a placard load.*
Parking exemption for dangerous goods vehicles in places without public access

A new clause has been inserted in ADG7.3 to exempt dangerous goods vehicles in areas not subject to public access from the requirement of clause 13.1.3.2.2.1(d), which requires 8 metres separation between dangerous goods vehicles.

13.1.3.2.2.4 13.1.3.2.2.1(d) does not apply to a road vehicle transporting dangerous goods that is parked or left standing in an area to which there is no public access.

Vehicles carrying a placard load of acid batteries may park in public places

In view of the low safety risk posed by a load of acid batteries, an exemption was granted by the Competent Authorities Panel that allows placarded vehicles containing acid batteries (UN 2794) to park in public places and residential areas if certain requirements are met.

Two new clauses in ADG7.3 reflect the exemption:

13.1.3.2.2.5 Despite 13.1.3.2.2.1, a vehicle carrying BATTERIES, WET, FILLED WITH ACID, electric storage (UN 2794) of Packing Group III that each have a gross mass of 65 kg or less, and that together have a gross mass of 5,000 kg or less, may:

(a) park in a public place if:
   (i) in the case of an enclosed vehicle, the load area is locked; or
   (ii) in the case of a tray-sided vehicle, the load is covered, or the vehicle is supervised; and
(b) be garaged in a residential area if:
   (i) in the case of an enclosed vehicle, the load area is locked; or
   in the case of a tray-sided vehicle, the garage is locked.

13.1.3.2.2.6 However, 13.1.3.2.2.5 only applies if the transport documentation for the load states the number of batteries in the load, and if that number is adjusted after each delivery so that it accurately states the number of batteries in the load at all times.

Adoption of new UN Model Regulations

ADG7 was based on the 15th edition of the UN Model Regulations. However, the UN Model Regulations are now in their 18th edition. ADG7.3 has incorporated most of the amendments made to the 16th and 17th editions.

The amendments are summarised in Table 1. Most are corrections, legal clarifications and updates to the technical standards underpinning ADG7.3, but there are also some new requirements.
### Table 1  Summary of amendments made to 16th and 17th editions of the UN Model Regulations that have been incorporated in ADG7.3

<table>
<thead>
<tr>
<th>ADG7.3 clause</th>
<th>Brief description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.2.1.1</td>
<td><strong>Definition of “Repaired Intermediate Bulk Container”</strong>&lt;br&gt;Replaces “manufacturer’s specification” with “design type from the same manufacturer”.&lt;br&gt;Restricts industry use of replacement bladders from different manufacturers.&lt;br&gt;Simplifies inspection and prosecution by the Competent Authority.</td>
</tr>
<tr>
<td>1.2.1.1</td>
<td><strong>Insertion of a new definition of “salvage pressure receptacle”</strong>&lt;br&gt;Salvage pressure receptacle means a pressure receptacle with a water capacity not exceeding 1,000 litres into which are placed damaged, defective, leaking or non-conforming pressure receptacle(s) for the purpose of transport (e.g. for recovery or disposal).</td>
</tr>
<tr>
<td>1.1.1.8</td>
<td><strong>Transport of dangerous goods used as coolant</strong>&lt;br&gt;Clarifies that these are only subject to clause 5.5.3.&lt;br&gt;Dangerous goods that are only asphyxiant (i.e. dilute or replace the oxygen normally in the atmosphere) when used in cargo transport units for cooling or conditioning purposes are only subject to the provisions of section 5.5.3.</td>
</tr>
<tr>
<td>2.3.3</td>
<td><strong>Determination of flash point</strong>&lt;br&gt;List of international standards allowed to be used to determine flash point has been updated. No impact because the AS 2106 has been retained.</td>
</tr>
<tr>
<td>2.9.2.1</td>
<td><strong>Assignment to Class 9</strong>&lt;br&gt;Addition of a comprehensive listing of all UN numbers making up Class 9 grouped into various categories. This is useful information without industry impact.</td>
</tr>
<tr>
<td>2.9.4</td>
<td><strong>Lithium batteries</strong>&lt;br&gt;Additional requirements to be met before these batteries can be transported by road or rail. Requirements are the same for air and sea transportation.</td>
</tr>
<tr>
<td>Chapter 3.2</td>
<td><strong>Dangerous Goods List</strong>&lt;br&gt;New entries to Dangerous Goods List with UN numbers exceeding UN 3841 and up to and including UN 3506.&lt;br&gt;For example, three new UN numbers for Calcium Hypochlorite (UN 3485, 3486, 3487) have taken the place of equivalent superseded UN entries for Calcium Hypochlorite (UN 1748, 2208, 2880) respectively. The only difference is the corrosive subsidiary risk.</td>
</tr>
<tr>
<td>4.1.1.20</td>
<td><strong>Salvage pressure receptacles</strong>&lt;br&gt;Addition of new section on the requirements for salvage pressure receptacles. This requires the gas industry and Western Australia’s approved emergency responders to obtain and maintain stocks of these items for use with leaking pressure receptacles.</td>
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<tr>
<td>(UN 4.1.1.19)</td>
<td></td>
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<tr>
<td>4.1.4.1</td>
<td><strong>Packing instruction P207</strong>&lt;br&gt;This new instruction for aerosols exempts (by leaving out compliance with 4.1.1.3) rigid packs up to 55 kg from any performance tests.</td>
</tr>
<tr>
<td>Chapter 4.3</td>
<td><strong>Use of bulk containers</strong>&lt;br&gt;Introduction of flexible bulk containers (BK3) allows industry to use them to transport those solid dangerous goods for which column 10 of the Dangerous Goods List contains the BK3 code. If the code is not indicated then a determination by the Competent Authority is required.</td>
</tr>
<tr>
<td>and Section 6.8.5</td>
<td></td>
</tr>
<tr>
<td>5.2.1.1</td>
<td><strong>Size of markings on packagings</strong>&lt;br&gt;This requires an increase in the size of UN No. marking on most labels between 5 kg (or L) and 25 kg (or L), and from 30 kg (or L) upwards</td>
</tr>
<tr>
<td>ADG7.3 clause</td>
<td>Brief description</td>
</tr>
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<td>---------------</td>
<td>-------------------</td>
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</tbody>
</table>
| 5.5.3 | **Asphyxiants used for cooling**  
Previously no requirements were specified for packages and cargo transport units that are cooled with solid CO₂ or liquid nitrogen or argon. Section 5.5.3 is the only requirement in ADG7.3 for these coolants, which are not contained in a cooling cycle. The requirements include documentation and markings to warn of the asphyxiation danger. |
| 6.1.2.7 also 6.1.4.14 | **Codes for designating types of packagings**  
Addition of material code “N” for containers made from metals other than steel or aluminium. |
| 6.1.3.1(a) 6.2.2.7.2 6.3.4.2 6.5.2.1.1 6.6.3.1(a) | **Marking**  
Clarification of how the UN packaging symbol may be used. |
| 6.1.4.0 | **General requirement**  
Any permeation of the substance contained in the packaging must not constitute a danger under normal conditions of transport. |
| 6.1.5.3.6.3 | **Revised criteria for passing drop test**  
Inners must remain completely within the outer packaging. |
| 6.2 | **Periodic inspection and test**  
New requirement for inspection and testing of pressure relief valves on cryogenic receptacles. |
| 6.2.1 | **Note**  
Aerosol dispensers and other items not subject to the requirements of clauses 6.2.1 to 6.2.3. This is for clarification only. |
| 6.2.1.1.5 | **Test pressure**  
Additional requirements for test pressures of pressure vessels.  
No impact as AS 2030 has to be reinstated here in line with the *Introductory Note and Packing Instruction P200*. Australian cylinders use pressure relief (as do those in the UK, USA and Canada), which means they cannot meet the UN/ISO pressure requirements. This is permitted by the UN. |
| 6.2.1.3.4 | **Service equipment**  
Reference to additional packing instruction. |
| 6.2.1.5.1 6.2.1.5.3 6.2.2.1.5 6.2.2.2 6.2.2.9.1 | **Inspection and test**  
Allows for metal hydride storage systems. |
| 6.2.1.6.1 | **Periodic inspection and test**  
Additional notes. |
| 6.2.2.1.1 6.2.2.3 6.2.2.4 | **Inspection and test and service equipment**  
Additional ISO cylinder standards. |
| 6.2.2.7.9 | **Marking refillable UN pressure receptacles**  
Clarification of marking of bundles. |
<table>
<thead>
<tr>
<th>ADG7.3 clause</th>
<th>Brief description</th>
</tr>
</thead>
<tbody>
<tr>
<td>6.2.3.3</td>
<td>Requirements for non-UN pressure receptacles</td>
</tr>
<tr>
<td></td>
<td>Receptacle types added.</td>
</tr>
<tr>
<td>6.2.3.5</td>
<td>Salvage pressure receptacles</td>
</tr>
<tr>
<td></td>
<td>Introduces new requirement for salvage pressure receptacles.</td>
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<td></td>
<td>These requirements came into effect in the UN Model Regulations from 1 January 2013. An equivalent one-year transition period is in place for ADG7.3 until 1 July 2015, notwithstanding the misleading note under this section indicating compliance by 1 January 2014, which was copied in error from the UN Model Regulations.</td>
</tr>
<tr>
<td>6.2.4.3</td>
<td>Alternative testing method has been introduced</td>
</tr>
<tr>
<td></td>
<td>Alternative testing for leak detection and pressure resistance for sterile aerosols containing pharmaceutical or veterinary products is allowed with the approval of the Competent Authority.</td>
</tr>
<tr>
<td>6.3.5.4</td>
<td>Puncture test</td>
</tr>
<tr>
<td></td>
<td>Figure 6.3.1 has been added for illustrative purposes.</td>
</tr>
<tr>
<td>6.5.2.2.2</td>
<td>Additional marking</td>
</tr>
<tr>
<td></td>
<td>Dimensions have been added to illustrations.</td>
</tr>
<tr>
<td>6.5.2.2.4</td>
<td>Additional marking</td>
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<tr>
<td></td>
<td>Further marking required for inner receptacles of composite IBCs.</td>
</tr>
<tr>
<td>6.5.2.4</td>
<td>Marking of remanufactured composite IBCs</td>
</tr>
<tr>
<td></td>
<td>Remanufactured IBCs require new markings and old markings need to be removed.</td>
</tr>
<tr>
<td>6.5.4.1</td>
<td>Package testing</td>
</tr>
<tr>
<td>6.6.1.2</td>
<td>Quality assurance programs required for remanufactured and repaired IBCs and large packagings.</td>
</tr>
<tr>
<td>6.6.3.1</td>
<td>Primary marking</td>
</tr>
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<td></td>
<td>Minimum size marking for large packagings.</td>
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<tr>
<td></td>
<td>Letters, numerals and symbols must be at least 12 mm high.</td>
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<td></td>
<td>Ignore the note in regard to a compliance date of 1 January 2014 — the compliance date for all amendments is 1 July 2015.</td>
</tr>
<tr>
<td>6.6.3.3</td>
<td>Primary marking</td>
</tr>
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<td></td>
<td>Additional marking required for large packaging to indicate the maximum permitted stacking load.</td>
</tr>
<tr>
<td></td>
<td>Ignore the note in regard to a compliance date of 1 January 2015 — the compliance date for all amendments is 1 July 2015.</td>
</tr>
<tr>
<td>6.6.5.2.2</td>
<td>Preparation for testing</td>
</tr>
<tr>
<td></td>
<td>Water may be used under conditions specified in clause 6.6.5.3.4.4.</td>
</tr>
<tr>
<td></td>
<td>This is only a clarification or restatement.</td>
</tr>
<tr>
<td>6.6.5.3.4.4</td>
<td>Drop heights</td>
</tr>
<tr>
<td></td>
<td>Height requirements amended to be consistent with all other drop test requirements in clause 6.1.5.</td>
</tr>
<tr>
<td>6.7.2.6.2</td>
<td>Valve protection</td>
</tr>
<tr>
<td></td>
<td>Includes requirement for external stop-valve.</td>
</tr>
<tr>
<td>6.7.2.8.4,</td>
<td>Pressure-relief devices</td>
</tr>
<tr>
<td>6.7.2.10.1</td>
<td>Fusible elements are now allowed.</td>
</tr>
<tr>
<td>6.7.2.13.1</td>
<td>Marking of pressure-relief devices</td>
</tr>
<tr>
<td></td>
<td>Additional tank marking required.</td>
</tr>
</tbody>
</table>
Marking of goods that are only dangerous by sea and air transport – regulations 112, 113 and 114

Packages sometimes arrive from overseas with dangerous goods marking and labelling that fully complies with:

- the IMDG Code with respect to sea transport
- or
- ICAO Technical Instructions with respect to air transport

but the contents are not classified as dangerous goods for land transport (e.g. Calcium Oxide – UN 1910).

This situation was an offence under the Transport Regulations and required the removal of the overseas labels. However, the amendment of regulations 112, 113 and 114 has legalised the use of the sea and air transport markings for such goods being transported by land.

Ullage requirements extended to non-dangerous goods in certain circumstances – regulations 146 and 147

Diesel fuel is the most common non-dangerous goods affected by the amendment to regulations 146 and 147 of the Transport Regulations.

When diesel and petrol are transported in separate tanks on the same vehicle, it is desirable to maintain the stability of the vehicle and minimise movement of the diesel inside the tank compartments. The usual dangerous goods ullage rules should be applied to the diesel compartments of the tank vehicle.

Retention of transport documents by prime contractor – regulation 156A

The 17th edition of the UN Model Regulations imposes obligations for the retention and reproduction of documentation, and these obligations have been adopted through amendment of regulation 156A of the Transport Regulations.

The prime contractor must now retain any documents under ADG7.3, or be able to reproduce them from electronic copies, for at least three months after the transport operation has finished.

Towing a broken-down vehicle – regulation 167

A new duty has been placed on the prime contractor in regulation 167 of the Transport Regulations. If a broken-down road vehicle is towed while still carrying dangerous goods that would require the driver to hold a dangerous goods driver licence, then the prime contractor must ensure that the tow truck driver either:

- holds a dangerous goods drivers licence
- or
- is accompanied in the cabin by a person holding a dangerous goods driver licence.

Further information

The State Law Publisher has posted the consolidated Transport Regulations at www.slp.wa.gov.au/legislation/statutes.nsf/main_mrtitle_2769_homepage.html