2 February 2018

Mr Paul Retter
CEO National Transport Commission
Level 15/628 Bourke Street
Melbourne VIC 3000
Via NTC portal

DRAFT AUSTRALIAN CODE FOR THE TRANSPORT OF DANGEROUS GOODS BY ROAD & RAIL EDITION 7.6 2018

Dear Paul

Gas Energy Australia (GEA) appreciates the opportunity to respond to the National Transport Commission (NTC) Draft Australian Code for the Transport of Dangerous Goods by Road & Rail Edition 7.6, 2018 and offers the following comments in relation to the transport of gaseous fuels for your consideration.

Substantially vertical plane

In relation to the definition provided for a substantially vertical plane, GEA members transport bulk gaseous fuels across Australia and the accepted practice is to have placards and emergency information panels in the form of decals which fix to a tank which is not a flat panel. As such, GEA members are concerned about the wording of the definition including how the measurement of 22 degrees from vertical came about and more importantly how it would be measured.

GEA suggests that any definition with a defined measure should include clarification on the limits of the measurement and therefore proposes the following expanded clarifying definition: ***Substantially vertical plane*** *means as close to vertical as possible under the circumstances, allowing for a deviation of no more than 22 degrees from vertical and the angle shall be taken from the mid-point of the display.*

Special provision 392

In relation to the special provisions outlined in 392, GEA would like to clarify its understanding of the extent and scope of the special provisions of section 392. In particular, GEA members would like to confirm that the changes to clause 392 do not apply to fuel gas containment systems that are already fitted to a vehicle such as towing or car transport applications.

GEA members would also like to confirm the reason that Liquified Natural Gas (LNG) is not included in the table of proposed gases is because:

- most of the transport of LNG tanks is done with an inert gas such as nitrogen which is outside the scope of 392; and
- on occasions when LNG fuel gas containment systems are transported containing natural gas, the gas would be in a compressed not liquified state, which would also place it outside the scope of 392, but still be able to be transported under the ADG code.

Let me close by stating that GEA supports the regular updating of the Australian Code for the Transport of Dangerous Goods by Road and Rail and looks forward to working with the NTC on this and other projects in the future.

Yours sincerely

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