



20 December 2019

Debra Kirk  
Manager of Legislative Maintenance  
National Transport Commission

### Review of ADG 7.7

Dear Debra,

Thank you for the opportunity to comment on the revisions to the Australian Dangerous Goods Code. The Australian Battery Recycling Initiative (ABRI) is the peak body representing the battery industry in Australia. It is a not-for-profit association established in 2008 to promote responsible environmental management of batteries at end of life. We are committed to improving safe transport of new and used batteries and to the development of best practice approaches.

We have reviewed the proposed changes to the Australian Dangerous Goods Code and provide the following high-level feedback.

**1. Support for international harmonisation**

ABRI supports harmonisation of transport regulations internationally and requests that this pursuit also be applied to inter-jurisdictional implementation within Australia.

**2. Request for single point reporting for all ADG related transport**

In particular, ABRI would like to see a single point transport reporting app that is applicable across states and across different types of dangerous goods.

**3. Standardisation of language in ADG 7.7**

Industry requests that NTC facilitates a process to identify opportunities and facilitate standardised language with regard to state interpretation of the Code, for example the definition hazardous waste (ACT), prescribed waste (Victoria/QLD), and controlled waste (WA/Tasmania).

**4. Recognition of changing technologies**

ABRI would like to highlight the potential for confusion associated with the term 'automotive' battery. In the past it would be clear that this refers to lead acid batteries, but this is no longer the case. Care needs to be taken in the use of the term automotive to describe lead acid batteries as this is no longer the only technology used in automotive applications. An example of this is in the Explanatory Document which refers to 'automotive batteries' when the corresponding requirements are specific to lead acid. On the flip side, lead acid batteries are not used in a range of other technologies for example traction batteries which are used in forklifts, sweepers, golf carts, riding floor scrubbers, electric motorcycles, electric cars, trucks, vans, and other electric vehicles.

**5. Confirmation that our previous comments regarding P801**

We support the changes to P801, however our previous feedback requesting that the requirements that apply to section 2 include the requirement to meet section 1 of that instruction still applies.

**6. Support for changes to the requirements for lead acid batteries - UN numbers 2794 and 2800**

ABRI is pleased to see changes that will make it easier for members to safely transport collection of multiple small parcels of ULAB, for example:

- the updated general placarding requirements in Special Provision AU08 for lead acid batteries new and used UN numbers 2794 and 2800 which will allow ULAB to be carried in larger parcels without placarding.
- this will be a positive change for our members who run large fleets of small vehicles to collect lead acid batteries for movement of new and used batteries.
- the inclusion of the assumption that 25% of gross weight of a lead acid battery is corrosive liquid if precise volume is not known provides a sensible approach.
- these changes are interpreted to mean that:
  - up to 2,000 L of corrosive liquid can be carried without placarding
  - transporters can now transport 8,000kg of ULAB without placarding

**7. Special Provision 376**

ABRI appreciates the clarification regarding the assessment of a cell or battery as damaged or defective and would welcome the opportunity to better understand the application of this requirement in the context of recycling.

**8. Special Provisions 389**

ABRI supports international harmonisation and as a result the inclusion of the requirement for Manufacturers (see typo in ADG) and subsequent distributors of cells or batteries manufactured after 30 June 2003 to make available the required test summary.

**9. Special Provisions 390**

ABRI supports the inclusion of added labelling requirements for lithium batteries contained in and/or packed with equipment.

**10. Packing Instruction P 903**

ABRI supports the added packaging requirements for lithium batteries and the requirement that equipment shall be secured against movement within the outer packaging.

**11. Packing Instruction LP 904**

ABRI supports the additional reference to packaging requirements in section 4.1.3 regarding general provisions for packing instructions.

**12. Packing Instruction LP905 and LP 906**

ABRI supports the clarifications contained in LP905

**13. Packing Instruction LP906 for lithium batteries**

ABRI supports the clarifications contained in LP906 and the addition

**14. Packing Instruction 911**

ABRI supports the added requirements that batteries must be protected against short circuit.

**15. Section 5.2.1.9 Lithium Battery Mark**

ABRI supports the slight changes to the mark requirements as it provides a wider range of options for members.

**16. Section 5.2.2.2 Specimen labels**

ABRI appreciates the inclusion of the specimen labels table as it facilitates clear understanding of labelling requirements.

**17. Complexity of the ADG**

Over the past year ABRI and a number of members new to the ADG have spent many many hours reading and ruminating the structure and requirements of the ADG. It is not an easy document to become familiar with. ABRI would like to partner with the NTC to prepare summary training and fact sheets for the different battery types. It is noted that in the US, the Department of Transport works with industry to provide similar training and ABRI considers this type of partnership to be a good model for improving industry awareness, understanding and compliance in the safety transport of batteries.

We would welcome the opportunity to meet with you to discuss any of the topics raised above.

Your sincerely



Libby Chaplin  
CEO  
AUSTRALIAN BATTERY RECYCLING INITIATIVE