

To submit a comment on a draft open for Public Comment please register with the Standards Hub and submit your comments online. Only registered Standards Hub users can submit comments. Drafts that are open for Public Comment can be accessed here: <https://www.hub.standards.org.au/hub/public/listOpenCommentingPublication.action>

All comments are required to be submitted online, any comment not submitted online prior to the close of comment date will not be considered for review by the committee.

Please do not modify or change this template, including its table headings, columns or structure, as doing so will result in the system rejecting your comment.

Fields marked with an asterisk (*) are mandatory and if not populated will result in the system rejecting your comment. Any supporting documentation can be updated after the successful submission of comments.

The "Section Identifier" should be laid out as per the examples below. If you use other formats (such as 2-3, 2/3 etc.) the system will reject your comment.

The "Comment Detail" field should describe the issue you feel should be addressed, and a justification for the proposed change.

The "Proposed Change" field should set out the specific text, figured etc. you propose to be added, removed or altered.

Example: How to complete the comment form:

*Sect./ Subsect. ¹	*Sect. ID	Para./Table /Fig./Comm ./Note	*Page No.	*Comment Type ²	*Comment Detail	*Proposed Change
Clause	2.3	Table 1	16	Editorial	"diagram" incorrectly spelt	Correct spelling error
Appendix	C15.6		62	Technical	AS 5100.7 incorrectly referenced	Reference should be AS 5100.2

¹ Options include: Clause, Title, Table of Contents, Preface, Foreword, Introduction, Appendix, Bibliography or Index.

² Options include: Editorial, General or Technical.

*Section ¹	*Section Identifier	Paragraph/ table/ figure/ commentary/ note	*Comment Type ²	*Page No	*Comment Detail	*Proposed Change
Clause	1.4	Definitions	Technical	2	Following definitions should be added	<p>Landing legs (semi-trailer) – telescopic landing gear which can be lowered to support the front of the semi-trailer when it is uncoupled;</p> <p>No Air in Motion (NAIM) - <i>is a system design that removes the air from ALL the interlocks fitted - such as gates, hose reels and hand rails, when the vehicle or vehicle combination is in motion. If the gate is opened when the vehicle does not have the park brake applied, there is no air available to pilot the auxiliary air system and apply the brakes. If the gate did open or an airline was damaged by road debris, the brake interlock system would only activate the next time that the park brake was applied.</i></p>
Clause	2.1.2	Stability	Technical	8	<p>Alternative Option to 62° Stability Angle: The ATA welcomes the option of stability assessment of SRT calculated using the NHVR PBS methodology. The calculated SRT shall equal or exceed 0.4 g. This allows a more appropriate assessment of stability where wide single tyres are used.</p>	Where PBS methodology is used to demonstrate compliance to design. How is this to be reported/recorded in the design approval?

¹ Options include: Clause, Title, Table of Contents, Preface, Foreword, Introduction, Appendix, Bibliography or Index.

² Options include: Editorial, General or Technical.

Clause	2.1.3	Roll Stability Systems	Technical	8	The ATA supports a requirement to mandate Roll Stability systems on all Road Tank vehicles. EBS/RSC is mandated on all new TC & TD category trailers from 1 Nov 2019.	The draft does not clarify whether this applies to “all” or only “new” road tank vehicles? We are of the understanding that an Australian Standards (like an ADR) cannot be retrospective, therefore, such a requirement could only be required via HNVL, requiring a CBS/RIS.
Clause	2.1.4	Road Clearance	Technical	9	Items not containing cargo attached to the tank via a doubling plate or to the chassis, such as landing legs, side underrun, tyre carriers should conform with the ADR, and are not covered by this clause.	The items referenced (landing legs, side underrun and tyre carriers) are NOT covered by any ADR. The clause should be amended accordingly.
Clause	2.1.5	Cabin to Tank Clearance	Technical	9	The requirement of 75mm will not provide adequate swing clearance for semi-trailers when traversing kerb/guttering. At a height of 1.8 ^{metres} above the fifth wheel and interface of 7.62° the tank pitches forward more than 200 ^{mm} ; Typically, this will require a swing clearance on level pavement of 300-400 ^{mm} .	The cabin to tank clearance requirement should be amended to require not less than 75 ^{mm} clearance at extremity of articulation:
Clause	2.1.6.2			10	ADR reference should include ADR 91/00. f) The strength of the bumper system shall be calculated as follows: (i) The design load shall be equal to 400 kN or twice the gross vehicle mass (GVM) of the fully loaded road tank vehicle, whichever is the lesser. GVM applies to motor vehicles only! What is requirement for trailers? Information provided by the ATA committee representative suggests that the NHVR indicated that should a specific version of a reference (eg: ADR) it would then make the reference within the standard non-compliant.	There seems to be a lack of understanding on ADR revisions. Any significant revision to ADR 91/00 would subsequently ADR 91/01. The Australian Trucking Association strongly opposes the exclusion of specific references to Australian Standards; Vehicle Standards; Australian Design Rules:
Clause	2.1.10	Battery	Technical	11		A reference should be added (as a requirement) that all electrical cables to be appropriately restrained using non-conductive clamps.
Clause	2.1.14	Brake Interlock Driveaway Protection	Technical	13	This is more commonly referred to as No Air in Motion (NAIM)	Reference to NAIM should be included in the clause.

Clause	2.1.5	Spill Hazards	Technical	13		A note should be included that “flags” design requirements to include provision of spill hazard management equipment such as: Spill Kit (Slops Bucket and Earth Lead) as required.
Clause	2.2	Stability	Technical	13	The ATA supports the inclusion (within the design) for semi-trailers to incorporate provisions to support itself fully loaded when disconnected. However, disconnecting fully loaded semi-trailer tanks should be discouraged (a prime reason why some operators remove landing legs in normal operation). There is a further dangerous situation with some semi-trailers (eg: leading B-double semi-trailers) in that when loaded or partially loaded (forward compartments) the semi-trailer may be inherently unstable.	The ATA recommends the inclusion of the following Notes: <ol style="list-style-type: none"> 1. Disconnecting fully loaded semi-trailer tanks should be discouraged, however where it is an operational necessity, operators should implement appropriate procedures and specific training. 2. There is a potentially dangerous situation in that some semi-trailers (eg: leading B-double trailers) in that when loaded or partially loaded (forward compartments) the semi-trailer may be inherently unstable.
Clause	2.6	Auxiliary Engines	Technical	13	This clause does not seem to specifically exclude spark ignition engines from use with dangerous goods.	Include: Spark ignition engines must be specifically excluded for use with dangerous goods.
Clause	2.7.4	Mudguards	Technical	14	The intent of this clause seems to intend to deter operators from using aluminium or plastic mudguards on prime movers, rigids and trailers? Plastic (and to a lesser extent – aluminium) mudguards have been used in the DG Tanker industry for at least the past 30 years without issue. Stainless Steel Guards have a significant impact on tare weight and hence reduce productivity! Operators confirm that plastic guards are less prone to damage from wildlife etc. This clause should be reworded as the reference to “should” sets a precedent.	Proposed re-wording: Mudguards with heat shielding properties or heat shields are recommended to be fitted above (over) all tyres/wheels that are located directly below a cargo-carrying component, to protect cargo-carrying components from radiant heat caused as result of tyre or wheel end failure and fire.
Clause	3.2	Regular Inspection and Maintenance	Technical	15	This section has been expanded considerable over the previous version AS2809.1-2008 and is beyond technical requirements. The objective of this Standard (as stated in the preface) is to provide designers, planners, operators and regulators with technical requirements for road tank vehicles transporting dangerous goods.	This section specifies maintenance requirements - to the extent that these requirements are more appropriate to in-service publications including NHVIM, Safe Load Program and Australian Dangerous Goods Code. And should be removed accordingly.