

10 October 2012

Manager, Stakeholder Engagement and Communications  
Legislation, Policy and Information Services Division  
WorkSafe Victoria  
222 Exhibition Street  
Melbourne VIC 3000

Via email: storageandhandling2012@worksafe.vic.gov.au

See Distribution

## **LPG AUSTRALIA**

### **SUBMISSION TO WORK SAFE VICTORIA**

#### **LPG Australia response to the Draft Victorian Dangerous Goods (Storage and Handling) Regulations 2012**

Dear Sir,

LPG Australia appreciates the opportunity to make a submission in response to Work Safe Victoria's *Draft-Victorian Dangerous Goods (Storage and Handling) Regulations 2012, and the Regulatory Impact Statement - Dangerous Goods (Storage and Handling) Regulations 2012 – September 2012*.

LPG Australia is the national peak body which represents the bulk of the downstream gaseous fuels industry which covers Liquefied Petroleum Gas (LPG), Liquefied Natural Gas (LNG) and Compressed Natural Gas (CNG). The industry comprises major companies and small to medium businesses in the gaseous fuels supply chain, including refiners, fuel marketers, equipment manufacturers, vehicle converters, and the providers of services to the industry.

LPG Australia recognises Victoria's efforts to improve productivity and safety outcomes in the handling of Dangerous Goods, and is supportive of the draft Victorian Dangerous Goods (Storage and Handling) Regulations 2012.

#### **LPG Australia responses to items outlined in Regulatory Impact Statement**

LPG Australia offers the following comments in relation to items outlined in the Regulatory Impact Statement – dated September 2012.

##### **6.2.3 Adoption of GHS**

*Duty holders can label under the ADG Code or the GHS, providing maximum flexibility to duty holders and ensuring that the Victorian storage and handling regulations can operate alongside the national WHS laws.*

LPG Australia supports this adoption.

##### **6.2.4 Replace incident reporting requirements with Code of Practice advice**

*That reporting to emergency services spills that poses no risk result in unnecessary regulatory burden and red tape on Victorian businesses.*

LPG Australia supports this replacement.

#### 6.2.5 Mandatory emergency services advice

*An amendment to compel duty holders to implement the advice of emergency services in relation to fire protection systems and emergency plans was first put forward by the Melbourne Fire Brigade (MFB) during the initial review of the regulations during 2009.*

#### **LPG Australia does not support the MFB amendment.**

LPG Australia supports the current arrangements for duty holders to seek and have regard to the advice of emergency services in relation to fire protection systems and emergency plans.

#### 6.2.9 Changing the frequency of manifest notifications

*This option identifies manifest quantities of dangerous goods requiring notification to WorkSafe Victoria every five years instead of every two years.*

LPG Australia supports the five year notification.

#### **Conclusion**

LPG Australia is supportive of the draft Victorian Dangerous Goods (Storage and Handling) Regulations 2012.

LPG Australia does not support the proposed amendment by the MFB for mandatory emergency services advice. LPG Australia supports the current arrangements for duty holders which is the preferred option outlined in the RIS.

Should you require further information then please do not hesitate to contact LPG Australia Manager Technical Development, Mr. Darryl Ramm via email [dramm@alpga.asn.au](mailto:dramm@alpga.asn.au) or telephone (02) 6176 3105.

Thank you for the opportunity to provide comment.

Yours faithfully



Michael Carmody  
Chief Executive Officer

Distribution: LPG Health Australia Health & Safety and Incident Management Committee  
LPG Australia Safety Standards and Technology Committee  
LPG Australia Secretariat