

11 August 2016

Ms Philippa Thode
National Transport Commission
Level 15/628 Bourke Street
MELBOURNE VIC 3000

Dear Ms Thode,

AUSTRALIAN DANGEROUS GOODS CODE

The Australian Paint Manufacturers' Federation Inc. (the APMF) welcomes the opportunity to comment on the proposed changes to the ADG Code, Edition 7.5

The APMF represents the surface coatings industry in Australia, with our members representing both paint and ink manufacturers as well as a range of companies that provide raw materials and services to our industry. Our estimated industry turnover is around \$3 billion per annum and our industry locally produces some 90% of the total surface coatings used in Australia.

Our industry is heavily reliant on the operations of the Code to conduct its day to day business and hence any reductions in regulatory burden that do not compromise safety are appreciated.

On that note, the APMF is supportive of the two proposed key amendments to the Code being:

- * the introduction of the Retailer Distribution Package within the Limited Quantities (Chapter 3.4); and
- * the removal of the transport mark and label requirements on inner packaging.

Thank you for the opportunity to provide comment on the proposed reforms. If you have any further questions, please contact me direct.

Yours sincerely



Richard Phillips
Executive Director