

**Submission to the
National Transport Commission**

**Response to the Regulatory Impact Statement on Transporting Limited
Quantities of Dangerous Goods**



Prepared by the National Retail Association

7 August, 2015

1.0 Overview

The National Retail Association is Australia's largest and most representative retail industry association. Our members range across all facets of retail and hospitality and hardware, and cover business models from large national chains to individual traders. Our members operate in highly competitive markets, and in an environment where consumers are increasingly price conscious and informed. For this reason, regulatory and compliance costs weigh heavily on retail businesses, many of whom feel unable to pass these costs on to their customers in their competitive environment. Our membership is significantly impacted by the matters canvassed in the Regulatory Impact Statement.

The NRA supports appropriate regulatory safeguards around the transport of dangerous goods to protect our members, all people working in the supply chain and the public at large. However, we also strongly support a risk-based approach to this type of regulation, and we believe that the current lack of such an approach seriously disadvantages retailers – particularly at the small business end of the market.

As many businesses in the retail sector currently operate across national borders – either in their dealings with customers or in their supply chain arrangements – we strongly support harmonisation of the transport regulations with trusted international standards.

2.0 Responses to consultation questions

- ☐ Do you support the assumptions used in the regulatory costings?

Yes, with the observation that the additional costs included in the assumptions do not necessarily apply evenly across the retail sector. Indeed, there is a likelihood that this cost burden falls disproportionately on smaller retailers who, in our experience, are likely to ship their products in smaller batches.

- ☐ Are there any additional costs or benefits associated with the current regulatory arrangements that have not been identified in the RIS (including any data or evidence to quantify the costs and benefits)?

We don't believe this to be the case.

- ☐ Is there any further evidence from Australia or overseas to estimate the actual risks associated with transporting LQs?

There is no such evidence available to the NRA.

- ☐ Which reform option do you/does your organisation support and why?

The NRA supports reform option four. In our view, this option strikes the best balance between ensuring the safety of all people concerned in the transport of dangerous goods and minimising costs to businesses and, depending on the product, consumers.

- ☐ What considerations should be taken into account during the implementation process (if an amendment is supported)?

We believe any change must be implemented uniformly across the nation. The potential benefits of reduced compliance and red tape will be quickly brought undone should the process result in a period of disparate regimes across state borders. We also urge a strong information campaign to ensure affected users are aware of their new (reduced) compliance responsibilities.

3.0 About the Submitter

The National Retail Association (NRA) is a not-for-profit industry organisation providing professional services and critical information and advice to the retail, fast food and broader service industry throughout Australia. The NRA is Australia's largest and most representative retail industry organisation, representing more than 19,000 stores and outlets.

The NRA's membership is comprised of members from all the sub-categories of retail including fashion, groceries, department stores, home wares, hardware, recreational goods, newsagents, fast food, cafes and personal services like hairdressing and beauty. It also includes both large and small businesses, including the majority of national retail chains, as well as independent retailers and franchisees, and other service sector employers. The NRA has represented the interests of retailers and the broader service sector for almost 100 years. The NRA's aim is to help Australian retail businesses grow.

4.0 Contact information

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