



Harmonisation of vehicle lighting standards 2025

Bus Industry Consultation

October 2025



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The Bus Industry Confederation

The Bus Industry Confederation (BIC) is the national independent peak body for the Australian Bus and Coach Industry. We represent over 160 bus and coach operators, body, chassis and complete bus manufacturers and suppliers, parts and service providers, professional services, and state bus associations on issues of national importance.

Our membership is becoming increasingly diverse as key energy and infrastructure partners join as we transition the fleet to low and zero emissions. The BIC advocates on behalf of our members to federal, state and territory governments and associated bodies, to ensure the safe and efficient carriage of passengers, along with safe and sustainable operations and supply chains that support the industry.

About Buses

Buses serve as mass transit, delivering benefits like reduced congestion, lower pollution, and enhanced productivity, as well as providing critical social mobility through frequent local routes. These benefits extend to improved public health, lower crime rates and better overall social outcomes, resulting in reduced costs for health and legal systems. The Australian bus industry is uniquely positioned to lead the transition to zero-emission technologies¹. for heavy vehicles, assisting decarbonising strategy for the nation.

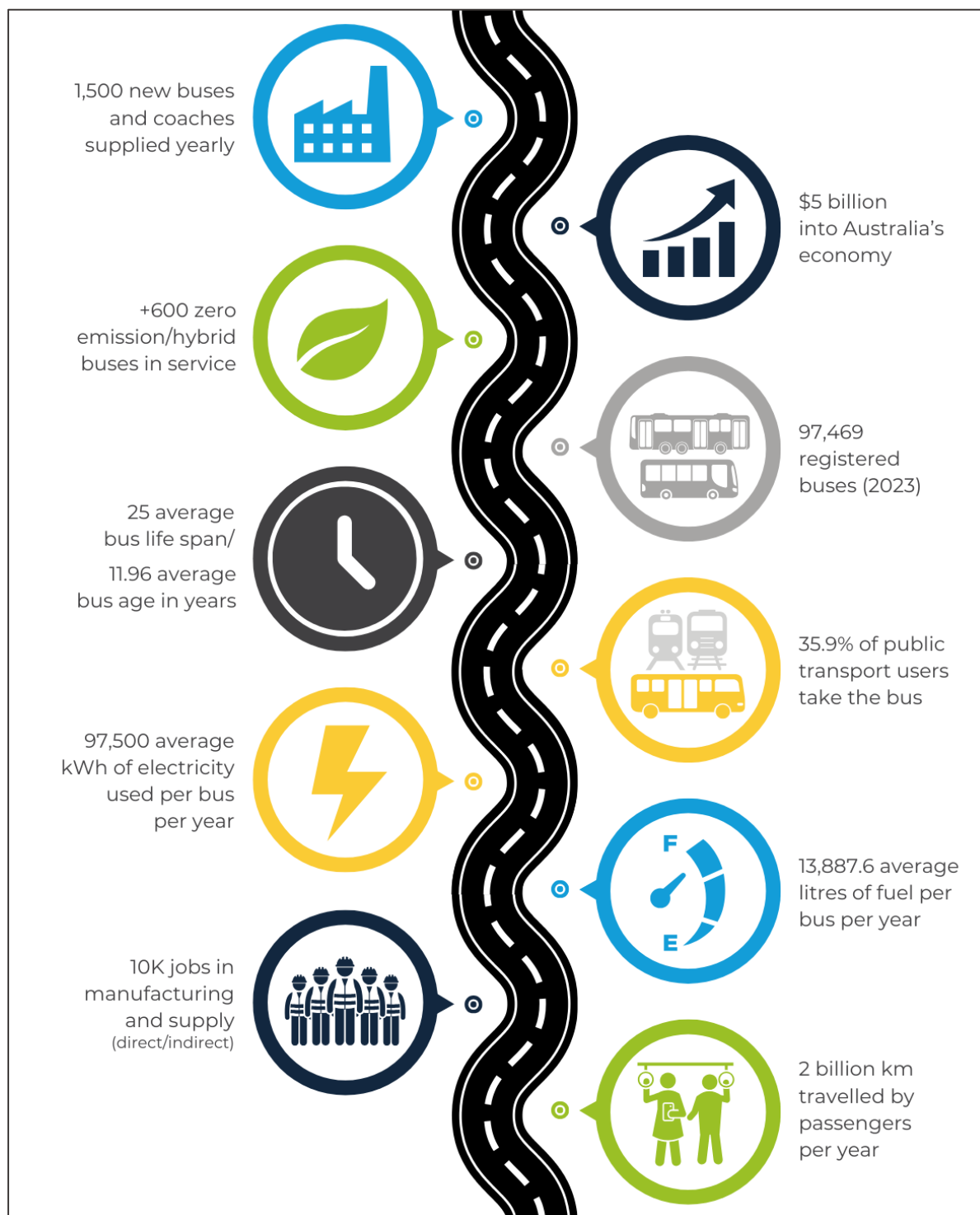
Buses have a strong and diverse manufacturing, and supplier presence in Australia providing 10,000 direct and indirect jobs in Australia. This encompasses full manufacturers, assemblers, importers, component manufacturers, suppliers, and importers. We provide an economic contribution \$5Billion yearly to the Australian economy.

Buses provide a cost-effective safe role in moving people from and to their destinations every day, whether it is dense urban outer urban, regional, remote, or interstate. For example, in outer suburban areas, where other mass transit options are scarce, buses are vital in addressing poverty, disadvantage, and the financial strain of car ownership. They offer essential mobility to communities facing isolation, poor services, and socio-economic challenges.

Buses - The essential public transport carrying Australia.

¹ BIC Policy Paper – [Driving towards Zero Emissions](#)

Industry Snapshot | 2025



Response

The Bus Industry Confederation (BIC) welcomes the opportunity to provide input to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (DITRDCA) consultation on Harmonisation of vehicle lighting standards.

General Feedback

The BIC members have provided constructive feedback to the proposed ADRs and some commentary which, while related to lighting, sits partially outside the official remit but is included given members concerns.

The overall response back to the proposed changes was positive with no specific concerns or questions relative to general lighting requirements. Positive comments on the explanatory statements were also noted, as they assisted in explaining the reasoning behind the changes.

The only area that repeatedly came up from our members was regarding school bus warning lights.

School Bus Warning Lights

School bus lights, while not directly covered as a category in the ADRs, are referenced by various jurisdictions and the National Heavy Vehicle Regulator (NHVR) when considering school bus light technical requirements.

Luminous Intensity

In reviewing the draft ADR 102, we note that a requirement for luminous intensity for direction indicators appears in Section App'x A, section 5.6.1, Table 8 (pages 28–29). It is also currently referenced in ADR 06 App'x A, section 6.1. So, luminous intensity for direction indicators also appears to be specified in both ADR 102 and ADR 06.

While ADR 06 is not listed in the review, it is widely referenced across various jurisdictional and HVNL regulations for school bus lights, particularly in relation to luminous intensity and the associated testing methods. With an almost identical table now appearing across two ADRs, we kindly suggest that DITRDCA raise this matter with jurisdictions during discussions on ADR harmonisation. The purpose is to ensure that the jurisdictional references to luminous intensity in the various school bus lighting regulations are assessed by each responsible jurisdiction and the NHVR for any concerns and addressed accordingly.

This will help avoid unnecessary complications or inconsistencies with existing school bus light technical requirements and eliminate impost on industry.

Standardisation

Whilst outside the direct remit of the review, members raised concerns regarding school bus warning light standardisation. There was widespread call from our members for school bus warning lights to be adopted into an ADR to avoid jurisdictional differences, hence its inclusion in this submission for future consideration.

Firstly, BIC acknowledges there is a standard in the Heavy Vehicle National Law Schedule 2, Division 16: Warning lights and signs on buses carrying children².

However, despite the good work of the NHVR, many jurisdictions such as NSW still impose varied requirements for school bus lights, whereas non NHVR jurisdictions such as the Northern Territory has no defined standard. To provide an example of the issue such variations cause, in border towns between NSW and Victoria, bus operators are required to have two sets of school bus lights on their buses to comply with the differing requirements between NSW and Victoria. Drivers are required to flip a switch when crossing the state border.

Apart from being impractical, the varying standards across jurisdictions could be perceived as a safety issue for other road users in understanding and recognising the differences in school bus lighting requirements across the country.

There is very limited data available on the human factor costs and injuries for school buses, although it's worth noting that half of the bus-related fatalities over the past five years involved vulnerable road users such as pedestrians and children³.

From a technology perspective, the cost to install a second set of school bus lights is estimated at \$2,200 per vehicle. This regulatory duplication conservatively costing governments who fund these vehicles upwards of \$110,000 per year for new deliveries. Additionally, variations between jurisdictions can lead to engineering design costs of up to \$8,000 per vehicle model.

BIC would encourage this matter of standardisation via an ADR to be included as part of any future lighting review. It is better to be preventative rather than reactive.

Recommendations

We appreciate the opportunity to contribute and provide feedback. BIC respectfully offers the following recommendations to support clarity specifically regarding school bus warning lights.

1. Jurisdictional Coordination: Recommend that DITRDCA raise the issue of luminous intensity references in ADR 102 and ADR 06 with jurisdictions to avoid duplication or inconsistency and ask that jurisdictions address any inconsistencies as required.
2. Standardisation: As part of future reviews, recommend DITRDCA consider incorporating school bus warning lights into a harmonised ADRs. This is to eliminate jurisdictional discrepancies, improving clarity for road users and provide commercial savings.

We appreciate your consideration of these recommendations and look forward to working with you further should any questions arise.

² <https://www.legislation.qld.gov.au/view/pdf/inforce/current/sl-2013-0076>

³ [INFRA6179 BITRE Bus safety stats.pdf](#)

Further Consultation

Should DITRDCA wish, the BIC would be open to discuss this document and commentary in further detail.

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