



DCCEEW Proposed IChEMS Standards

Bus Industry Submission

May 2025



The Bus Industry Confederation

The Bus Industry Confederation (BIC) is the national peak body for the Australian Bus and Coach Industry. We represent over 150 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

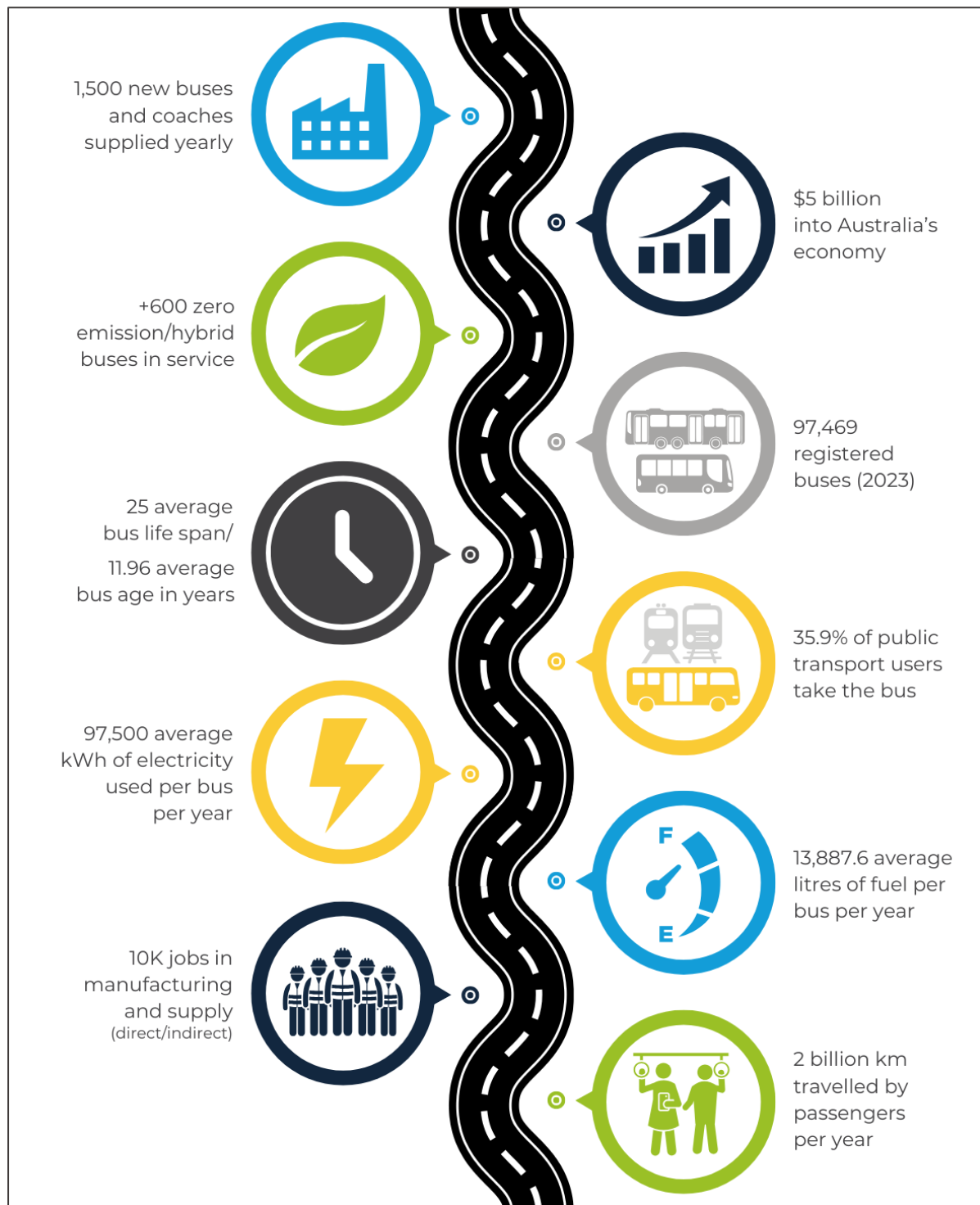
Buses serve as mass transit during peak hours, delivering societal benefits like reduced congestion, lower pollution and enhanced productivity, as well as providing critical social mobility through frequent local routes. These benefits extend to improved public health, lower crime rates and better overall social outcomes, resulting in reduced costs for health and legal systems.

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.

Buses provide a cost-effective role in moving people from and to their destinations every day, whether its dense urban outer urban, regional 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.

Bus and Coach

Industry Snapshot | 2025



Response

The Bus Industry Confederation (BIC) fully supports the Truck Industry Council's (TIC) submission regarding the proposed restrictions on Decabromodiphenyl ethane (DBDPE) and Mercury. BIC strongly urges the Department of Climate Change, Energy, the Environment and Water (DCCEEW) to consult directly with key industry bodies—including BIC, TIC, and FCAI—before taking any further regulatory action.

Lack of consultation

The lack of direct communication with these organisations, despite their known roles in national regulatory discussions, was a serious oversight in the development of the proposed standards. This is compounded by the fact that no cost-benefits analysis has been carried out or shared to assess the practical and economic implications of these changes.

Deviating from International Standards

The bus and broader automotive industries rely on substances like DBDPE and Mercury to meet internationally recognised fire safety and component reliability standards (e.g. UN Regulation R118). Introducing unilateral non-harmonised bans risk disrupting manufacturers' ability to supply compliant vehicles to Australia.

The bus industry, like the truck sector, is heavily reliant on imported vehicles and complex components. Imposing unique Australian requirements that differ from global standards is not feasible and would isolate the local industry from established harmonised international standards.

Impact to Australian Public Transport

With Australia making up less than 1% of the global bus market, a national ban on DBDPE and Mercury, absent of global alignment or viable alternatives, could result in the loss of vehicle models, reduced parts availability, shortened vehicle lifespans, and serious disruptions to public transport. These requirements could make buses difficult or impossible to buy or maintain, significantly impacting the 40% of public transport that buses currently support.

Less Choice and Fewer Jobs

It would be highly probable that manufacturers may withdraw from the Australian market or severely restrict offerings if forced to meet bespoke local standards. This would reduce choice and drive-up costs.

These disruptions would undermine safety and emissions outcomes and threaten the viability of local manufacturing—putting at risk over 5,000 Australian jobs in the vehicle supply chain.

A Harmonised (Global) Approach

BIC joins TIC in urging Australia to align with international regulatory frameworks such as the Stockholm Convention and avoid isolated, premature regulations that would compromise the supply and reliability of critical transport services.

Summary

Adopting the DCCEEW's proposed IChEMS restrictions on Decabromodiphenyl ethane (DBDPE) and Mercury would severely impact the bus industry, public transport, business viability, and employment. BIC does not support the proposal.

BIC, like TIC, recommends DCCEEW:

- Align harmonised international best practice by following the Stockholm Convention when considering the regulation of Persistent Organic Pollutants in Australia and.
- Engage directly with peak automotive industry bodies—including BIC, TIC, and FCAI— prior to considering any future or further changes in this area.

Further Consultation

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

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