



TfNSW Asset Certification and Acceptance TS 00024 Part 2 Submission

July 2026



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1. About the Bus Industry

The Bus Industry Confederation

The Bus Industry Confederation (BIC) is the national independent peak body for the Australian Bus and Coach Industry. With a focus on decarbonisation, local jobs and workforce shortages BIC 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.

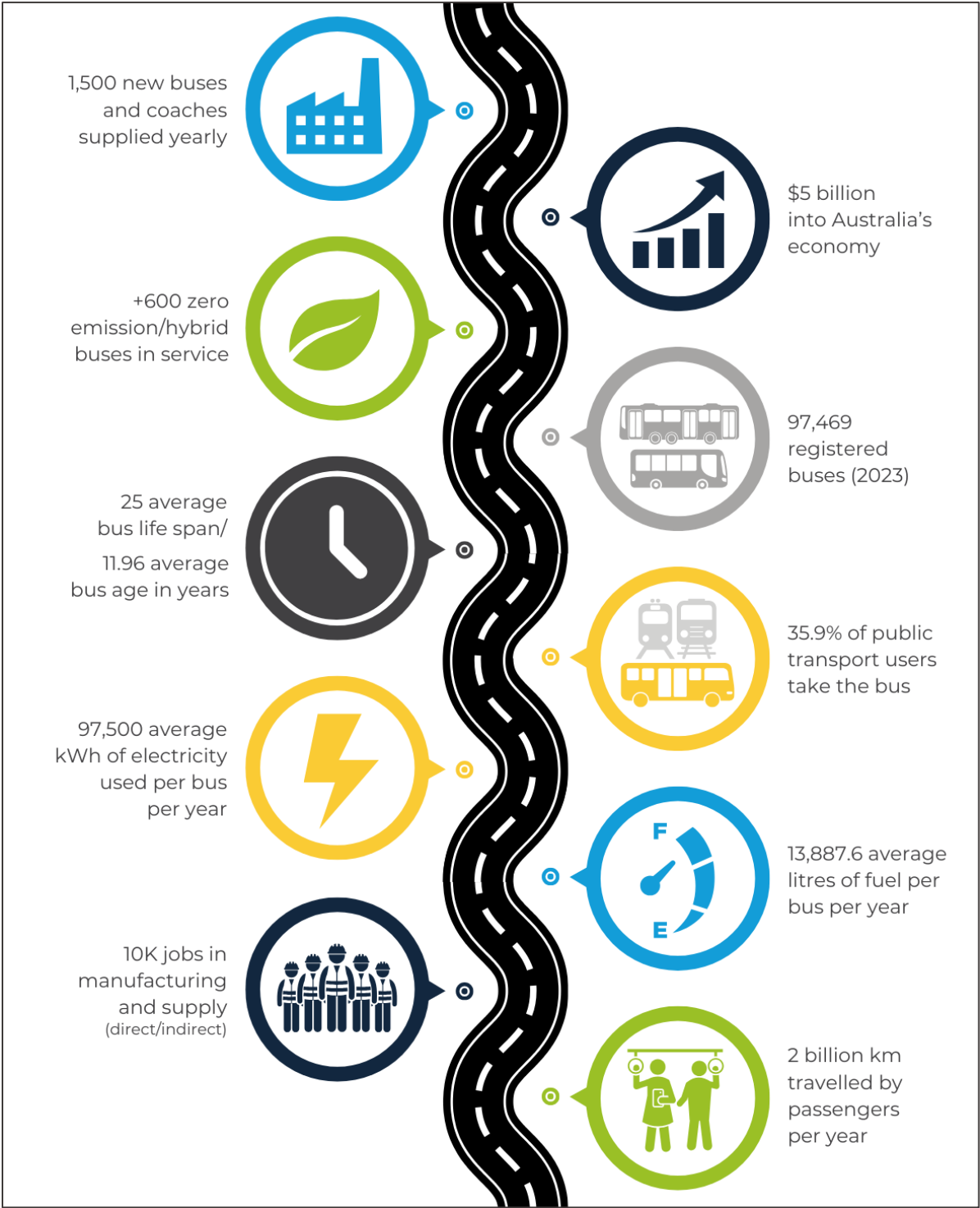
BIC supports sustainable operations, workforce capability, and long-term local employment across Australia. BIC advocates for its members to federal, state and territory governments and relevant agencies, working to ensure the safe and efficient transport of passengers and the development of safe, sustainable operations and supply chains that underpin the industry.

BusNSW

As the peak industry body representing bus and coach operators in New South Wales, BusNSW was established in 1942 and represents a diverse and broad-based membership. This includes contracted operators delivering essential public transport services under Transport for NSW contracts across metropolitan, outer-metropolitan, and rural and regional areas. BusNSW also represents non-contracted operators in the long-distance, tourist and charter sectors, as well as associate members from the manufacturing, supply and service industries that support the bus and coach sector.

BusNSW's mission is to advocate for the efficient and sustainable growth of public transport in NSW and to promote bus and coach travel as a safe, reliable, and accessible means of connecting people and communities. The Association's governance framework is designed to ensure fair and balanced representation across the industry, encompassing small and large businesses, family-owned enterprises, private companies, and multinationals.

Industry Snapshot



2. Executive Summary

The Bus Industry Confederation (BIC) and BusNSW recognise the importance of robust asset assurance and acceptance processes for Transport for NSW (TfNSW) bus assets. Industry supports continuous improvement; however, any revised framework must be practical, proportionate and aligned with the way buses are procured across New South Wales.

BIC, BusNSW and their combined member base do not support the proposed TS 00024 Part 2 – Asset Certification and Acceptance in its current form.

The proposed standard is not fit for purpose because it does not adequately recognise the different bus procurement models used by TfNSW. While battery electric buses for Greater Sydney are procured by Transport for NSW in high volumes through the Project Bus Request process, diesel buses for outer metropolitan and rural and regional contracts are procured by operators via the Bus Panel 4 (BP4). With approximately 480 rural and regional operators, around 80 per cent of whom operate fleets of between one and five buses, applying the same assurance framework across these diverse procurement models would introduce unnecessary cost, complexity and administrative burden for both industry and government.

The proposed framework also introduces a fundamentally new assurance process before key supporting elements, including independent certification arrangements, have been established. It moves away from the mature BP4 asset assurance framework, introduces numerous additional technical standards that industry has had limited opportunity to consider, and appears to have been developed without sufficient regard to existing TfNSW procurement processes. Industry is also concerned that it would require global original equipment manufacturers to modify established quality assurance systems to meet TfNSW-specific requirements, rather than recognising internationally accepted standards.

These concerns were reinforced through a joint BIC and BusNSW survey of operators, OEMs and suppliers. Respondents identified uncertainty regarding responsibilities, implementation requirements, compliance costs and duplication with existing BP4 processes. Nearly 70 per cent considered that primary responsibility for asset assurance should remain with TfNSW and OEMs, and there was strong support for enhancing the existing BP4 framework rather than replacing it.

Industry's position is clear: asset certification and acceptance should evolve, not be revolutionised.

Building on the BP4 asset assurance framework agnostic to future procurement models offers a more practical, efficient and collaborative pathway to improving safety and quality outcomes while recognising the differing procurement models used across the TfNSW bus network.

Recommendations

BIC and BusNSW remain strongly committed to safety and continuous improvement in asset assurance. Accordingly, we make the following recommendations on asset design quality, conformity and handover. These measures would establish a more robust and consistent baseline for buses delivered in New South Wales.

- 1. Conduct a full cost-benefit analysis.**

Before progressing any proposed standard, Transport for NSW should commission a comprehensive cost-benefit analysis. This analysis should assess compliance costs, impacts on vehicle capacity, implications for overall fleet size, associated

infrastructure requirements, and the comparative safety outcomes of the proposed standard.

Given the scale of the zero-emission bus rollout, including around 8,000 vehicles through to 2047, a clear understanding of the full cost impact on the TfNSW budget is essential. Any change to standards will affect both capital costs and operating expenditure. Government and industry need robust evidence to ensure any new requirements remain proportionate, practical, and cost-effective over the life of the program.

2. **Do not proceed with TS 00024 Part 2 in its current form.**

There is no need to build a new process from the ground up. The proposed approach is unnecessarily complex, carries unknown but likely significant cost and compliance implications, and would require OEMs to redevelop processes and standards that already exist and function effectively.

3. **Evolve the current BP4 asset assurance process.**

Industry would support an enhanced version of the existing BP4 framework that is purpose-built for buses and informed by practical industry expertise. This would avoid the complications and risks of starting again while still improving quality assurance outcomes.

4. **Collaborate with industry.**

This submission does not seek to resolve every detail of an alternative pathway. However, BIC and BusNSW believe that structured industry dialogue and workshops would provide a better basis for enhancing an already mature, bus-specific standard. This approach has industry support and would help ensure any future requirements are outcomes-focused, practical, and proportionate.

5. **Assess regulatory interactions of any proposed standards.**

Any proposed standard should be assessed against existing vehicle and safety regulatory requirements, including obligations under the National Heavy Vehicle Regulator (NHVR), the Master Code, and Chain of Responsibility requirements. This assessment should clarify how TfNSW, as a party to relevant procurement and operational arrangements, would meet its responsibilities and avoid duplication, inconsistency, or unintended regulatory conflict.

6. **Build capability in-house.**

Independent certifiers may not be perceived as fully independent where they are contracted by an OEM. Different certifiers may also reach different views, creating the potential for inconsistency or unnecessary dispute. These matters would be better managed through appropriate in-house TfNSW capability and oversight.

7. **Confirm asset assurance responsibility.**

Until a vehicle is handed over to the operator (asset custodian) asset assurance responsibility should sit with the asset owner (TfNSW), rather than with an operator or independent certifier. Operators can change, and vehicles may be moved by TfNSW between operators over their asset life. These movements create complexity in tracking and managing assurance obligations. Allocating responsibility in-house would provide clearer accountability and more consistent lifecycle management.

3. Response

The Bus Industry Confederation (BIC) and BusNSW welcome the opportunity to provide input to Transport for NSW (TfNSW) on the proposed Technical Standard TS 00024 Part 2 Asset Certification and Acceptance.

BIC and BusNSW acknowledge that TfNSW requested feedback through a comments register. However, the issues raised through member consultation, and the breadth of matters identified in our review, cannot be adequately captured in that format alone. For this reason, this submission provides both section-by-section feedback on the proposed standard and broader feedback drawn from member consultation and survey responses. We respectfully request that TfNSW consider this submission as an alternative format that better reflects the significance and interrelationship of the issues raised.

The Importance of Quality

The importance of safety in bus operations cannot be overstated. Government and industry share a responsibility to ensure that everyone who travels on, drives, maintains or supports bus services can do so safely.

Quality assurance in asset design, acceptance and handover is a critical part of that safety chain. BIC and BusNSW therefore support the objective of improving assurance, consistency and accountability across the bus asset lifecycle.

Our concern is not with the objective of improved quality assurance, but with the proposed method for achieving it. In its current form, TS 00024 Part 2 appears to introduce a new and complex framework without first resolving key practical matters, including roles and responsibilities, certification pathways, regulatory interaction, cost impacts, and evolution of with existing processes.

Industry supports a more practical pathway: strengthen and evolve upon the existing BP4 asset assurance framework, rather than replace it with a process that has not yet been fully tested, costed or integrated with existing bus procurement and acceptance arrangements.

4. Standards Feedback by Section

Although our stated position is that the proposed standard should not proceed in its current form, this section provides industry feedback by section to explain why an evolutionary approach would be preferable to replacing the existing process.

General Comments	
Established processes already in place	Buses already have their own established process for delivering, checking and accepting assets as part of the existing BP4 process. To dispose of this in its entirety and replace it with a completely new system ignores what is already in place for buses and simply adopts a rail-based project model. If this is genuinely the right direction, which industry does not support, then the structure would need to be developed step by step, not shoehorned into existence as the draft standard implies. Bus Panel specifications are detailed and complex, requiring prior knowledge to apply consistently. The purpose of the Bus Panel is to provide a common process and practical framework for bus design, handover and operation for TfNSW. The proposed process would disrupt this established approach.
Readiness	To our knowledge, the following processes are not currently in place, but would be required for organisations and operators to be accredited to or utilise for buses: • TAO (Technically Assured Organisation): accreditation process for organisations and operators • IC (Independent Certifier): an independent expert engaged to certify compliance • OCD (Operational Concept Definition): a process for managing business requirements in line with the OCD and three additional TS standards • CCB (Configuration Control Board): a body of stakeholders to manage stage gate reviews and acceptance throughout bus development. These processes would need to be established, communicated and supported by an appropriate transition period before any new standard is implemented.
Current Deeds of Offer	How does this process affect the current Deed of Standing Offer and manage the already stated supplier requirements? There is a significant shift here, and it is not clearly articulated.
Section 5: Bus acquisition process	
Chart process flow	The chart is fundamentally flawed because buses must be on the approved panel before ordering. The chart is only valid if buses are ordered before compliance is confirmed. The process does not represent all TfNSW bus purchases, such as category two smaller buses.
Chart Compliance flow	Section 5.6 states: <i>'The OEM or supplier shall verify that all buses supplied comply with all of the requirements of the BPS including the documents and standards referenced within'</i> . The purpose of the panel approval process is to confirm this before purchasing. This requires revision.
Role of a TAO and IC	Is Independent Certification (IC) required on an ongoing basis, or only until the supplier becomes a Technically Assured Organisation (TAO)? Once a supplier achieves TAO status, what ongoing assurance is provided regarding continued compliance for the OEM and operators?

	We have not been able to locate a list of approved ICs.
Independence and transparency	If the IC is contracted by the OEM, the independence of that arrangement may be questioned. There is a potential conflict that should be addressed. TfNSW should retain at least the same level of oversight, if not more, in the general handover of vehicles. While it may not be TfNSW's role to act as a quality gatekeeper, direct knowledge and involvement in the assessment process are important to ensure clarity and transparency.
IC and TAO costs	How is the cost of this managed appropriately given there are so many requirements in the proposed standard and that this has not been undertaken before?
Pathways	What is the transition pathway for an organisation to become a TAO? This needs to be defined well in advance.
Section 6: Bus compliance responsibilities	
Responsibilities	The procurer, not the operator, is responsible for handover compliance under the NHVR Master Code. Please reference the Master Code for responsibility obligations, which may include TfNSW as a prime contractor.
Section 7: Systems engineering	
Design processes	How realistically manageable is the expectation that global suppliers will change internationally recognised frameworks to accredited standards to meet NSW standards? This requires further discussion and clarification.
Stage gate processes and checks	How will stage gates apply to overseas builds? Who funds the processes for this and how are these additional costs accounted for? What is the acceptable expectation on costs for this?
Independence	If stakeholders (operators and OEMs) are managing compliance how is this seen to be independent?
Section 8: Methods of verifying requirements	
General	This appears to be a complete re-write of the process rather than evolving or improving the existing process.
Assess overlap	The scope requires further refinement to ensure there is no overlap with federal regulations such as ADRs and HVNL requirements, which already have systems in place to manage these matters.
Section 9: Requirements verification and traceability matrix	
Alignment	The RVTM requirements should be aligned to the technical specifications and a defined stage gate. Is updating the review the responsibility of the IC where there is no TAO? Further clarity is required.
Applicability	Is an RVTM required for every vehicle delivered, or only for each first vehicle type? The intent and feasibility require clarification. Auditing requirements could also be added.
Section 10: Verification and Validation Plan (VVP)	
General Flow	It seems to be the way this is written that the RVTM should be part of the RVTM. This needs to be educated in detail if it needs to be applied. Presently everything seems to be separated, and the recommendation is for the document to flow better.

Test specifications	There is a lack of alignment with existing testing requirements, creating uncertainty. The requirement for the OEM to develop test specifications appears somewhat redundant, as testing requirements are already set by the BP4 technical specifications, ADRs, HVNL and other TfNSW standards, such as TS 00160 Door Systems. This requires clarity and cohesion.
Governance and independence	It is implied that the OEM will conduct all testing themselves and make the documentation available to Transport for NSW, while other sections indicate coverage by an IC. There appears to be some conflict, and clarity is required on the respective roles. With TfNSW as the purchaser, we suggest checking its prime contractor responsibilities under NHVR rules, which may require direct involvement or appropriate oversight.
New requirements	How are these requirements merged or adapted into existing Deeds and requirements under BP4, or do they apply only to new bus panels?
Section 11: Bus 'Type' documentation deliverables	
Clarification on documentation requirement	While the intent of providing defined documentation is a sound requirement, cannot this be better aligned to the existing and already comprehensive requirements as listed in BP4 and then listing additional requirements where needed. This would assist with transitioning from existing requirements to new additional needs. We suggest a comparison of BP4 vs this new requirement is needed. This will also identify if any requirements have been omitted between BP4 and this proposed requirements which may have been omitted in error. A variation to the Deed of Standing Offer and funding MAY be required.
Standards Clarification	Some standards listed here are still in draft or double up or not clearly labelled. - TS 00034 and TS 00013 are still in consultation draft. - TS 01461, as mentioned in section 3j, is not listed in the standards list and, after seeking assistance, was identified as TfNSW standard T MU AM 06002. - EMC is already listed in other TfNSW standards, including TS 00036.
Existing formats	The need to provide parts catalogues is logical, provided the method for meeting this requirement is format-agnostic, for example electronic or another suitable form. Consider using BP4 as the basis for setting requirements.
Section 12: Bus 'Type' document records	
Duplication and variations	The document list here duplicates content already covered in the Technical Specification for BP4. The list in BP4 should be compared against, and reflected in, this document; otherwise, a variation to the Deed of Standing Offer will be required. A comparison of the requirements in BP4 against the documents held/audited should be conducted as eluded to earlier.
Section 13: Bus 'Series' documentation records	
Duplication	Please refer to our comments for section 12 that also equally apply to this section.
Section 14: Bus asset pre-handover checks	
Overlap to TS 01508.	There is clear overlap between the general requirements in TS 00024 and those in TS 01508 Asset Handover Plan, as required in section 14a. We suggest this is

	reviewed to avoid duplication and possible conflict between competing requirements. A detailed comparison should be conducted to avoid these issues.
Responsibility	Industry is concerned that this is entirely on operator to manage when it may be the procurer's responsibility (TfNSW) under the various codes. We would suggest checking this to ensure there is no oversight.
Section 15: Bus asset handover checks	
Responsibility	Industry is concerned that this is entirely on operator to manage when it may be the procurer's responsibility (TfNSW) under the various codes. We would suggest checking this to ensure there is no oversight.
Duplication	There is duplication with other sections. We suggest a comparison of BP4 and TS 00024 is needed. This will also identify any duplications and any requirements that may have been omitted between BP4 and the proposed requirements.
Inspection list	We would also including a specific requirement for inspecting the physical bus as currently common in most vehicle handover checks.
Section 16: Bus asset post-handover and original equipment manufacturer support	
Duplication and variations	We acknowledge the need for clear terms of requirements, but is this post-handover support truly part of asset acceptance and handover, or a separate requirement for ongoing support under the terms of the Deed? This is already covered in detail under current BP4 requirements, and we suggest a comparison of BP4 and this new requirement is needed. This will also identify whether any requirements have been omitted between BP4 and the proposed requirements.
Section 17: Modifications and configuration changes	
Further development	This requirement whilst important requires <u>significant further consideration</u> as to the practicalities on what is being asked, how it will be applied and how it is provided. Changes cover many aspects, whether regulatory enforced (ADR updates), general vehicle improvements, improvements due to material defects etc... Changes made presently under BP4 run through a contract change process where cost implications are considered. How this is affected requires clarification, including how it interacts with configuration change proposals (CCPs).
Responsibility	The operator is not the asset owner; how will these changes affect where TfNSW move assets from one operator to another. This requires answering or move the responsibility to the asset owner.
Flow Chart	The flow chart in this section would also need further refinement as the matters raised above and elsewhere in this submission are considered.
Section 18: Requirements for independent certifiers (IC)	
Role of the IC	We have a number of concerns which require attention. Please refer to our comments in the <i>General comments section</i> and <i>section 5 Bus Acquisition process</i> .

5. Survey Findings

Overview

BusNSW and BIC conducted a joint survey of members. The survey received thirty-two responses evenly spread from NSW bus operators, OEMs and component suppliers. Respondents were asked to assess the implications of the proposed standard from a practical perspective, including performance, best practice, preference and ownership.

This feedback formed a significant basis for the response, complemented by general commentary following the TfNSW industry briefing.

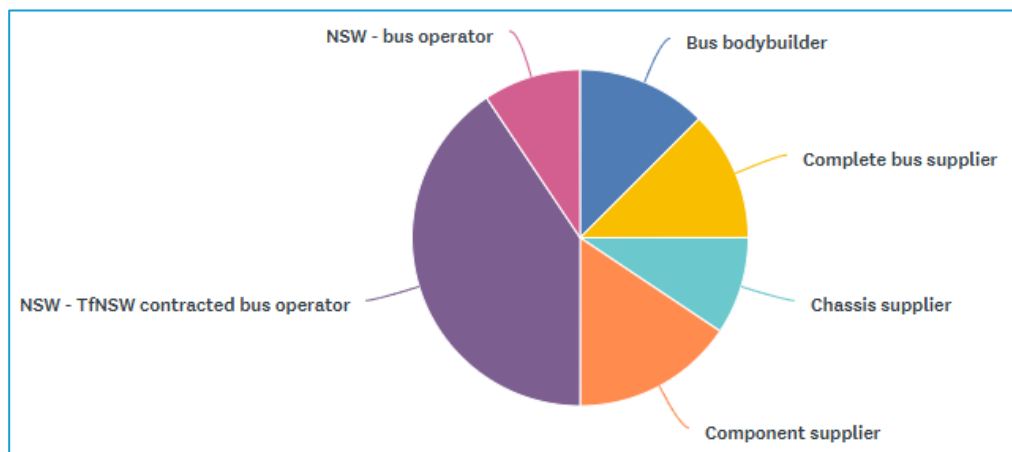


Figure 1: Segmentation of industry respondents

This spread gives the results below a genuinely industry-wide perspective, rather than a single sector's view of the proposed standard.

Compliance Responsibility

Under the proposed standard, operators carry responsibility for key aspects of bus acceptance, handover checks, and ongoing compliance assurance. Members were asked whether this allocation of responsibility is appropriate. The clear majority view of nearly seventy percent was that **responsibility should not sit primarily with the operator**. Most respondents favoured either placing this responsibility with TfNSW and the OEM, or a shared model weighted towards TfNSW and the OEM rather than the operator.

This result is consistent with feedback mentioned elsewhere in this submission. Operators do not set the procurement specification, in many cases now do not select the OEM, and in many cases do not retain the same vehicle for its full asset life as buses are moved between operators by TfNSW. Asset assurance responsibility is more logically and more practically held by the asset owner and the party that controls the procurement and design specification, rather than the end operator.

One respondent summarised the industry view plainly:

'A third-party or in-house compliance team that will be consistent across the industry where there is no gain financial or positional for them.'

This view was echoed in the general comments received, with one respondent noting that operator responsibility in acceptance should also focus on the quality and safety of the delivered product, not just on compliance with TfNSW standard, and that this distinction matters because most operators have no input into, and no choice over, the asset they are ultimately required to accept.

Handover is best administered by the asset owner.

Proportionality of Handover Requirements

The proposed standard applies uniformly across all operators, regardless of size, location, or capability. Members were asked whether the requirements are proportionate for their organisation. Feedback was that the requirements are only partially proportionate, with some elements achievable and others not, and a smaller but still significant proportion considered the requirements not proportionate to their capacity at all.

This result reflects the structure of the bus industry itself. A standard written without regard to scale risks placing an equal compliance burden on small operators as it does on large multinational operators, even though their capacity to absorb that cost and resourcing impact is fundamentally different.

This result further supports the requirement for a single entity to support asset handover.

Notification of Configuration and other Changes

The standard, as drafted, would require manufacturers to notify TfNSW of all configuration changes and seek permission in some cases. Both bus operators and OEMs were independently asked about this point. Operators were asked how they would like to be informed of changes generally, and OEMs were asked what level of notification is practically achievable and reasonable.

Operators clearly indicated the need to be informed of changes, and OEMs preferred continuation of the current BP4 process, provided it is administered and monitored.

One respondent raised an important caution that is worth carrying directly into TfNSWs consideration of this requirement:

'Establish a clearly defined list to detail what changes are required and what can be accepted through parts systems updates. TfNSW need to be very careful what they are asking for, or it could become a meaningless endless list of inconsequential changes. This needs to be workshopped further so that meaningful changes are listed and the purpose of this remains true to its intent.'

There are also concerns about how this overlaps with contractual and current processes under BP4.

Notification requirements need to be deliberately scoped to changes that are material to safety, structure, or function. An open-ended obligation to notify every change or parts update and/or seek permission for changes risks becoming an administrative exercise that

adds cost and delay without improving safety outcomes. Much of this is already covered in existing processes not recognised in the proposed standard.

BusNSW and BIC strongly recommend that this is best resolved through structured workshopping with industry before any requirement is finalised.

Additionally, the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts (DITRDCSA) is considering adopting UN Regulations R155 and R156 for Australia, covering cyber security and software update management for vehicles. Any TfNSW requirement on software changes should dovetail with this work, not duplicate or pre-empt it, to avoid an inconsistent compliance burden on OEMs.

Stage Gate, Design Verification

The proposed standard introduces stage gate reviews, design verification processes, and lifecycle documentation, overseen by an OEM-funded Independent Certifier. Members were asked to describe the impact of these requirements on their organisation. The majority of more than sixty-two percent respondents assessed the impact as significant, requiring additional resources, cost, or delivery adjustments, with fifteen percent describing the impact as significant enough to have major cost, time, or delivery implications. Another fifteen percent indicated they were unsure of the impact and would need more information before they could properly assess it, which in itself points to a need for clearer guidance from TfNSW before this requirement proceeds.

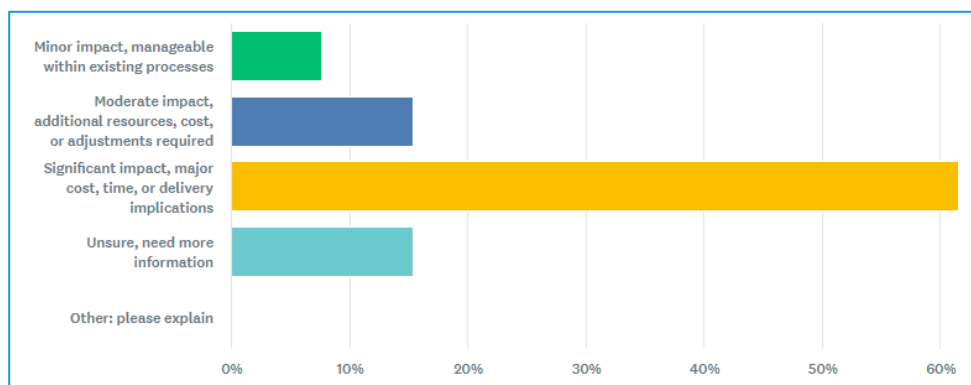


Figure 2: Feedback on impact of changes

Very few respondents considered these requirements manageable within their existing processes. This is consistent with the broader feedback in this submission that the ecosystem required to support an Independent Certifier and Technically Assured Organisation model, including accreditation pathways, an approved list of certifiers, and clarity on independence where the IC is contracted by the OEM, does not yet exist.

Industry acknowledges the need for a defined process and has a strong preference for an enhanced version of what is applied through current BP4 asset assurance process, including recent changes where TfNSW has engaged in detailed first model type testing. Industry also supports periodic auditing.

In our view, further industry workshops are needed to develop a practical, outcomes-based solution. BP4 provides a sound foundation for processes and measures that support first-of-type conformity and can be expanded into ongoing assurance for serial production vehicles.

A suggestion for further development is the process flow similar to the one right.

This type of assessment process is nothing new and something that functioned well for the NSW Government in the period prior to TfNSW Panel. It is also a model that works well for other jurisdictions.

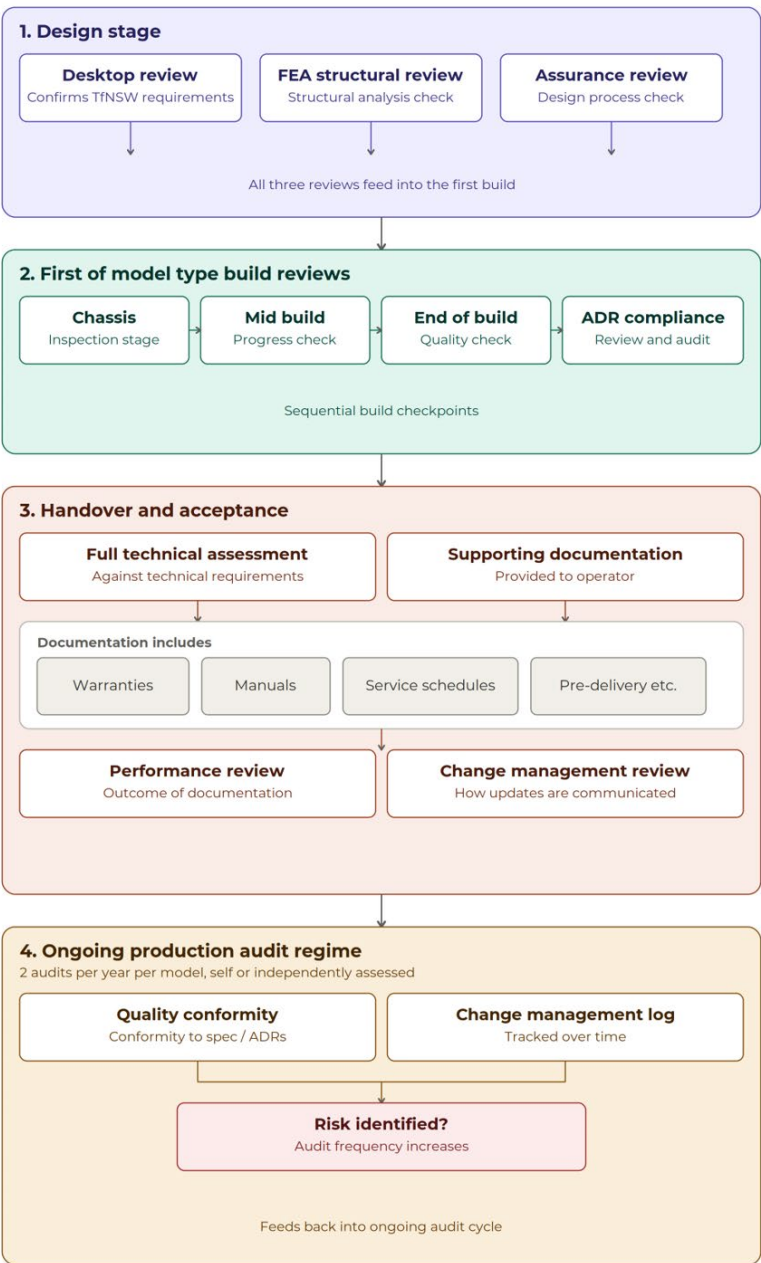


Figure 3: Suggestion for design and acceptance flow chart (non-exhaustive)

Overlap with Existing BP4 Requirements

Members were asked the extent to which they consider there to be overlap or duplication between the proposed standard and the existing BP4 contractual and technical requirements. Every respondent identified an amount of duplication on current requirements and those proposed, which would require clarification or amendment.

This finding reinforces a theme raised consistently throughout the section-by-section feedback in this submission, that TS 00024 in its current form duplicates, rather than builds on, requirements already established under BP4.

Even if consolidation of vehicle OEMs occurs, as indicated in late June by TfNSW during the final stages of this consultation period, it is in the best interests of both TfNSW and industry to ensure that any transition is supported by a fundamental evolution of TfNSWs requirements.

Building on existing knowledge, experience and investment will deliver significantly better outcomes than effectively starting again from first principles.

Survey Additional Comments

Seventeen members provided written comments in addition to the structured questions above. Several consistent themes ran through this feedback.

Evolve, do not replace

The single most repeated message was a call to evolve the current BP4 asset assurance framework rather than introduce an entirely new standard. Respondents described the proposed standard as reinventing a wheel that already exists and functions and asked that TfNSW work with industry on an evolution of the process.

Genuine collaboration, not consultation after the fact

Multiple respondents asked that any new procurement or acceptance model be developed in conjunction with industry from the outset, rather than introduced as a finished draft standard for comment. One respondent noted that this proposed approach to procurement may work for a large, single bulk purchase, but that it is unclear how it would suit smaller or staged purchase arrangements, reinforcing the case for direct collaboration rather than a one-size-fits-all standard.

Cost discipline

Several respondents cautioned that meaningful requirements must be clearly distinguished from inconsequential ones, warning that the standard as drafted risks driving up cost without a corresponding benefit. It appears evident that no cost benefits analysis or best practice analysis has been considered in the standards development.

One respondent went so far as to recommend the standard be withdrawn entirely and reworked through a dedicated industry workshop process.

OEM accountability and aftersales support

A detailed comment from an operator member supported the need for OEMs to be clearly aware of their responsibilities not only during the development and delivery of new vehicles, but also throughout the operational life of the bus. OEMs should be expected to provide appropriate and ongoing aftersales support to ensure vehicles continue to perform as intended and operators are adequately supported over the life of the asset.

In-house management

A clear preference was for the process to be managed in-house by TfNSW, rather than through a pseudo-independent certifier or operator for asset handover. TfNSW ownership is fundamental to a cohesive asset plan. Keep this in-house until the asset is handed over to the asset custodian.

Provision for small and low-volume suppliers

Consistent with the proportionality findings above, one respondent noted that the proposed standard is especially limiting for new or small suppliers, particularly those operating at low volumes, where the cost and time burden of compliance falls disproportionately on the supplier. That respondent indicated this may be acceptable in principle provided TfNSW makes clear provision for entry-level and low-volume suppliers, including a defined pathway to TAO registration and assurance that Independent Certifiers will be readily available and accessible when needed.

As noted above, late-stage notification that TfNSW may consolidate suppliers may consequentially change this position.

Operator input into design and specification

A number of operator respondents called for greater operator or industry savvy input into design and specification decisions, noting concerns with current outcomes in areas such as zero-emission bus performance, and observing that the teams setting these specifications are not always drawn from industry. Respondents were also concerned that an overly prescriptive standard risks excluding legitimate industry-led innovation in favour of a single prescribed restrictive approach.

Industry preferred future state

Industry supports a strong and consistent asset assurance framework for buses in NSW. However, that framework should build on existing strengths, recognise established industry practice, and focus on demonstrable safety and quality outcomes rather than procedural compliance.

Survey Summary

Taken as a whole, the written comments reinforce every major finding from the structured survey questions above. Industry is not resisting improved compliance discipline. It is asking TfNSW to build that discipline from the existing BP4 foundation, scale it sensibly for suppliers of different size and volume, involve industry as a genuine partner in its development, and ensure the cost and administrative burden are proportionate to a demonstrated safety or quality benefit. The process should be managed in-house.

Evolution not revolution.

6. Contact

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