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## **ADR Harmonisation Review 2024-25 - Submission**

### **About the Australian Motorcycle Council**

The Australian Motorcycle Council was formed in 1980 and revitalised in 2004 with a broader membership structure. The objectives of the Council are to:

- Promote and improve all aspects of road safety concerning motorcycling in Australia
- Promote, improve and protect the use of motorcycles in Australia, recognising their environmentally beneficial place in urban and land transport planning and systems
- Promote and improve at all levels the full knowledge, awareness, understanding and acceptance of motorcyclists' welfare and safety needs in Australia
- To promote the safe and convenient use of motorcycles in Australia

### **Discussion**

While the Australian Motorcycle Council appreciates there are advantages in converting United Nations regulations into Australian Design Rules, it also has the view that there are disadvantages in relying solely on converting United Nations regulations and international standards as the review of these regulations and standards are not undertaken with the frequency to allow the flexibility to respond to emerging issues, particularly those resulting from technological change.

For example, headlight glare due to the rapid uptake of LED technology.

A report by Member of the House of Lords of the United Kingdom, Baroness Dianne Hayte, on the issue of headlight glare and its effect on road safety, says that until 2008, there was an informal working group established under GRE of WP29, that was dedicated to glare prevention. This group was hibernated and the AMC recommends it be resurrected to develop glare counter measures.

Even though Australia is a member of UNECE Working Party 29, the AMC is concerned that Australia has been unable to use its influence to bring the

UNECE informal working group out of hibernation to address excessive glare that has resulted from the introduction of LED headlights.

In the meantime, vehicles with very powerful headlights are being introduced into the Australian vehicle fleet and with an average life of a vehicle being around 11 years, these will remain in the fleet for many years to come.

The AMC recommends that this is addressed now rather than wait until the UNECE Working Party 29 finally gets around to addressing this issue of excessive glare and updating the UNECE regulation for vehicle lighting. We anticipate there would then be a further delay in incorporating the changes into the ADRs.

Excessive glare could be controlled by restricting the intensity of LED headlights to a brightness of around 5,000 lumens and a colour temperature of 6000K for vehicles imported into Australia. Also dipped LED headlights need to be directed so they only illuminate the road surface directly in front of the vehicle.

Currently when driving a car at night with conventional headlights, it is common to have a following LED equipped car lighting up signs even though the LED equipped car is twice the distance from the signs. Dipped headlights are to illuminate the road surface when driving in built up areas. High beam is for illuminating objects in the distance.

The Australian Design Rules need to be able to be reviewed promptly in response to emerging issues rather than wait until United Nations regulations and international standards are updated.

Yours sincerely

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