

Hi, my name is Robert. I work in a small heavy vehicle inspection yard in Western Australia. As such, I have an interest in heavy vehicles and semi-trailers.

We can use this streamlining of the ADRs to codify certain current industry practices which, under a strict reading of the current ADRs, actually make some vehicles and trailers non-compliant.

Currently, the ADRs allow all front-facing lights on a semi-trailer to be yellow in colour. Manufacturers take advantage of this by fitting yellow side markers to the front of their trailers in place of front position lamps and front-end outline lamps. Recently, in order to cut costs and labour, trailer manufacturers have been buying side markers with integrated yellow reflectors. When these markers are fitted to the front of the trailer, they render the trailer non-ADR compliant, as even though the lamp is allowed to be yellow, the reflector must be white. I have been told by WA DoT to ignore this discrepancy, as the WA Traffic Vehicle Standards 2014 state that the front reflector can be white or yellow, which contradicts the ADRs.

This industry practice should be codified into the ADRs as an allowable exception to the white front reflector requirement, allowing the reflector to be yellow if incorporated with a yellow position lamp. Alternatively, yellow should be a permissible reflector colour on all trailers and vehicles.

In Western Australia, I also inspect "mine-spec" fleet vehicles and sometimes road-registerable machinery. The current industry practice is to apply yellow conspicuity tape on all four sides of all vehicles, trailers, and machinery. This was not an issue previously, as the ADRs did not include any requirements for conspicuity marking. However, a few years ago, UNECE conspicuity regulation 104 was adopted into ADR 13, restricting yellow reflective tape to only the sides and the rear, and prohibiting such markings altogether on passenger vehicles and light trailers.

I currently do not deny registration to heavy trailers with yellow tape on the front, or to vehicles and light trailers with yellow tape on all four sides. However, under a strict reading of the ADRs, this tape makes these vehicles non-compliant. This should be rectified, especially if reflective markings become mandatory as per the original UNECE document.

If no action is taken, fleet vehicle owners and mining companies will have to spend time and labour removing the existing yellow tape from tens of thousands of trailers and light vehicles. Owners of heavy vehicles and semi-trailers would be forced to remove the existing yellow marking on the front of their trailers and trucks, wasting time and money and decreasing overall safety. This is particularly concerning for vehicles that interact with heavy equipment on mine sites.

One solution is to permit front conspicuity markings to be yellow, as all front lighting on trailers and road-registerable machinery is already allowed to be yellow. To avoid negatively impacting companies with mine-spec fleet vehicles, conspicuity markings should be allowed on light vehicles and light trailers instead of being prohibited, as is currently the case.