

It is my belief that we should use this review to streamline the ADRs, particularly ADR 13, and remove certain regulations with conditions, or alternatively, remove the conditions on specific regulations. This would make importing and inspections after purchase easier, especially for private imports. Most of these conditional requirements, particularly regarding lighting, were originally introduced to facilitate easy importation. However, the conditions on these regulations mean almost no imported vehicles can utilise these exemptions.

Front Position Lamp

This lamp must be white unless combined with a side marker, where it is allowed to be amber. It can also be amber when mounted on a T4 trailer.

This conditional exemption:

1. **Costs trailer manufacturers money** as it forces them to buy white front position lamps if they manufacture converter dollies. This is unnecessary since all front lighting on a semi-trailer (T4) is allowed to be amber, allowing the same lamp to be used as the side markers.
2. **Creates registration challenges** for certain vehicles with wrap-around side marker lights (e.g. newer domestic market BMWs, Range Rovers, and various grey and private imports). These vehicles are denied registration in certain states due to state interpretations of ADRs, which do not include this exception for light vehicles—only heavy vehicles with ADR 45 side markers. For example, Tasmania only allows white front position lamps on light vehicles.
3. **Has no impact on safety** as the visual difference between an amber front position lamp that is combined with a side marker and one that is not is negligible to nil.
4. **No longer makes sense**, as the latest UNECE lighting regulations permit a second set of front-end outline marker lamps to be mounted with no height restrictions, allowing an amber lamp to be mounted on the front of a vehicle, pointing forward below the windscreen.

Proposal:

This exemption should be removed, and the colour table in ADR 13 should be amended to read "white or amber," matching the current colours allowed for front end outline markers.

Side Marker Colour

Ignoring ADR 45 side markers, the current side marker regulation allows the rear side marker and reflector to be red if it is combined, reciprocally incorporated, or shares the same lamp body with the rear position lamp, stop lamp, or rear fog lamp.

This creates problems for imported vehicles:

1. Imported US domestic market vehicles must be fitted with rear side markers as the narrower visibility requirements (45 degrees outward) of USDM position lamps do not comply with ADRs (80 degrees outward) unless a marker is present, but the mandatory side marker must be red under US DOT regulations.
2. If the OEM marker is separate Importers are forced to:
 - Modify the rear side marker to amber, or
 - Find tail lights where the red side marker is combined in the lamp housing.
3. Manufacturers and individuals fitting OEM parts face challenges due to differences in trim levels. Whether a vehicle includes rear fog lights can dictate whether a side marker lamp is allowed to be red or amber in the same position on the same vehicle. This is particularly problematic for replacement parts. For example, if a new part has a side marker and rear fog light in the same housing but the original vehicle lacks wiring for the rear fog light, the replacement part would be illegal under current ADRs.

Proposal:

Amend the regulation to state:

Side marker colour: "Amber to front, amber or red to rear, except the rearmost lamp, which may emit red to the front and rear."

This change would eliminate these problems and have no detrimental impact on safety, as a red rear side marker is already allowed under certain conditions.

US Domestic Market Headlights

The current allowance for US domestic market-approved headlights as an alternative to ECE or ADR standards should be removed.

Rationale:

1. US domestic market headlights produce more glare than allowed under ADR regulations.
 2. They are designed for the opposite side of the road, exacerbating the glare issue on Australian roads.
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Daytime Running Lights

The current Australian Light Vehicle Standards Rules 2015 on which states base their motor vehicle regulations, allow daytime running lights to be white or amber/yellow. As a result, states permit lamps that do not comply with ADRs.

This means that a privately imported vehicle can keep its OEM Amber DRLs but a re-manufactured vehicle will need them to be deactivated. This also means a vehicle inspector needs to know how a vehicle was brought into the country to decide if vehicle can be registered in a state.

Proposal:

Amend the ADRs to allow daytime running lights to be white, yellow, or amber. This change would address this inconsistency and ensure compliance across state and federal law

Conclusion:

Making these changes will align Australia more closely with other Pacific nations such as Thailand, New Zealand, India, Japan, and China, which have harmonised their standards with UNECE regulations but included these types of exceptions to facilitate the import of USDM vehicles.