

7 October 2025

Director
Vehicle Standards
Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts
GPO Box 2154
Canberra ACT 2601
VIA EMAIL

RE: HVIA's response on the harmonisation of vehicle lighting standards

To whom it may concern,

HVIA welcomes the opportunity to provide a response to the Department's harmonisation of vehicle lighting standards, which are relevant to the interests of HVIA and its members.

HVIA understands that draft ADRs were developed to harmonise Australia's regulations for lighting and light signalling devices with the United Nations (UN) regulations. That initiative followed a review by a UN group that consolidated 20 lighting regulations into three function-based regulations, without changing requirements. The new ADRs and the lighting functions they relate to are:

- ADR 101/00 – Light Emitting Diode Light Sources
- ADR 102/00 – Light Signalling Devices
- ADR 103/00 – Road Illumination Devices
- ADR 104/00 – Retro-reflective Devices and Markings

The Department's proposal for the new ADRs also includes amendments to existing ADRs, namely 13/00, 19/02 and 67/00, to recognise the new ADRs as alternatives to the current ADRs for lighting components fitted to vehicles.

HVIA has circulated the proposal amongst its members and provides the following feedback to the Department.

Regulatory duplication

It is understood that the Department proposes to introduce the four new ADRs into the ADR package alongside existing equivalent ADRs, thereby offering two compliance pathways, for an unspecified period.

HVIA understands the impetus for the proposal, and that offering two compliance pathways initially is perhaps the best outcome when a set of ADRs shifts from characteristic-based to function-based, as is the case here.

Nonetheless, such situations are rare and may cause confusion amongst approval holders and the wider industry. To that end, HVIA encourages the Department to:

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- provide clear communication to industry regarding the regulatory impacts of the change, including the status of each ADR, how that may vary in the future, and the impacts on existing and future type approvals
- ensure that sufficient Department resources are available to cater for any approval holders wishing to demonstrate compliance under the new ADRs
- consider how questions regarding the ADR status of products provided to market during the period of two compliance pathways will be answered (i.e. *does this specific lamp comply with the old characteristic-based ADRs, or the new function-based ADRs?*)

Doing so will minimise the downstream impacts on approval holders and applicants, including the time and costs of demonstrating compliance, and will ultimately reduce costs for end-users.

Furthermore, HVIA strongly encourages the Department to consider its preference for the length of time the two compliance pathways will be offered, and the options for industry at the end of that period.

This must include consideration to impacted approval holders that might need to 'switch' from one compliance pathway to the other, and the impacts on the Department in the instance that existing VTAs need to be updated, to reference changes to Component Type Approvals (CTAs).

In any case, HVIA strongly encourages the Department to consult with industry to understand the impacts of its preferences, and to cater for the preferences of industry.

LED substitute light sources

The draft of ADR 101/00 includes text relating to LED substitute light sources that requires:

- the approval of both the vehicle model and the light relating to its use in that specific vehicle to be demonstrated via up-to-date website listing
- a warning that use of the substitute light outside of its instructions (and the vehicle's instructions) may cause electrical faults and/or pose an operational and safety risk.

HVIA acknowledges the difficulty in devising a regulatory framework that guarantees compliance and eliminates all safety risks, but considers that the ADR requirements may not be completely effective in preventing/reducing improper use of substitute lights, and roadside enforcement of such fitment and use may be difficult or impractical.

Thank you for the opportunity to engage with the Department on this harmonisation project. Please contact me to discuss any points relevant to HVIA's response at a.ritzinger@hvia.asn.au.

Yours sincerely,



ADAM RITZINGER
CHIEF TECHNICAL OFFICER

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