20 April 2016

Charles Brister
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BIC Response to Ministerial Forum on Vehical Emissions

Dear Mr Brister,

BIC supports the introduction of Euro 6 emission standards for heavy vehicles. As there have been significant discussions over a long period about the implementation date of the standards, the BIC supports the introduction date for new models of 1 Jan 2018 and for existing models from 1 Jan 2019.

The BIC supports the adoption of the equivalent US and Japanese emission standards.

The BIC is concerned, as it was with the introduction of previous emission standards, of the increased mass implications of new equipment and technology to meet the Euro 6 standards. It is estimated that Euro 6 will add 300kg to 350kg to the tare weight of a bus or coach. Legal mass limits should be increased accordingly

BIC has concerns as expressed in the past about the problems faced by bus chassis manufacturers and bus body manufacturers in relation to the "crystal balling" of the market to determine the number of chassis they should import, and have in stock, when new ADRs are introduced that set an implementation date that simultaneously introduces a new vehicle/model to the market place.

Currently the vehicle certification process for buses demands that a vehicle be fully built and ready for service before it can be "ADR plated".

This requirement and the introduction of new vehicle emission standards sees bus and coach manufacturers having to complete vehicles as stock vehicles with various types of seating configurations installed so that the bus can be ADR plated by the emission change over date.

Due to the large variations in bus operational conditions, such as school services, route bus or charter services, the industry practice for stock buses the seats are left out until a customer is found for the stock bus and then the seats are fitted to meet that customer's specific operating requirements. If seats are fitted before the intended customer is known, there is no certainty that the vehicle will be sold with that seating configuration or having to be sold at discounted prices to minimize financial loss, or the seating has to be removed and replaced.

The BIC would like to propose an alternative approach be adopted by the Federal Government.

The BIC would like to propose that buses and coached be allowed to be built and pre-plated "without seats". Once the seats are fitted, the bus could then be fully and correctly planed in accordance with the final seating arrangements.

Rules would be required to ensure that Chassis were not flooding the market to take advantage of these proposed changes: some suggestions of rules are as follows:

1. Chassis must have arrived prior to September 30 of the relevant year for new models and all new vehicles and have documentary evidence of the arrival date.

2. Completed vehicles must have arrived prior to December 15 of the relevant year with documentary evidence of the arrival date.
3. All units must be completed by 31st June of the following relevant year.

These standards apply to vehicles with a seating capacity of 30 to 61 seats utilised in school, charter, tourism and city bus services.

The suppliers within the bus and coach industry have already taken steps to aid the transition to the new Euro 6 standard and some already offer Euro 6 in the Australian market. In taking this step the positive impact on emissions is already being realized.

The BIC seeks the support of all jurisdictions for this approach for the bus industry and BIC would then be happy to work through the details of such a process with the Department of Infrastructure and Regional Development Vehicle Safety Standards branch.

Yours sincerely,

Michael Apps

Executive Director