



**AUSTRALIAN AUTOMOTIVE
AFTERMARKET ASSOCIATION**

Australian Automotive Aftermarket Association (AAAA)

Response to the Consultation on Reforms to improve use and recognition of standards in regulation

August 2025



Who we are

The Australian Automotive Aftermarket Association (AAAA) is the peak national industry body representing the Australian supply chain for automotive products, vehicle maintenance, repair, and modification.

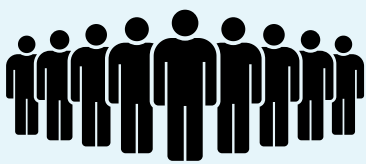
Our industry supports car owners after the purchase of the car, keeping vehicles safe and providing products for modification to make vehicles fit for purpose, including trade and emergency vehicles – in essence, everything that happens to the car after the initial purchase is part of the Australian automotive aftermarket sector.

Our members design and manufacture automotive components; distribute replacement and service parts in real-time; wholesale, import and export automotive parts and accessories, retail tools and equipment; and provide vehicle service, repair, and modification services in every community in Australia.

We support our members with industry and business improvement benefits while also undertaking important advocacy campaigns, providing events and training, and commissioning in-depth and industry-first research to help members make informed decisions.

AAAA and our member companies are proud to passionately defend the reputation and integrity of the independent aftermarket and stand by our products and professionalism.

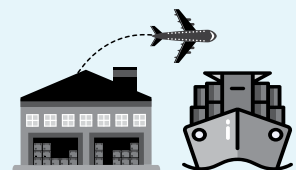
AAAA is also a nominating organisation on numerous Standards Australia committees covering a wide range of parts and accessories, tools, and equipment; and our member representatives are actively involved in the development of product quality standards.



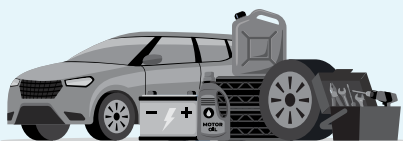
3,000 Member companies represented by the Association in all categories of the Australian automotive aftermarket



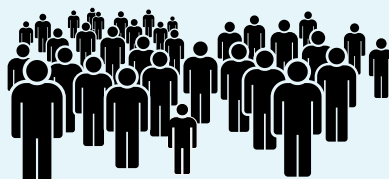
Members include major national and multi-national corporations as well as a large number of independent small and medium size business



AAAA member companies export over **\$1 billion** worth of Australian manufactured product each year



The parts and maintenance sector is a large and critical component of Australia's \$200 billion automotive industry



AAAA member companies employ more than **40,000 people**



Member companies are located in metropolitan, regional and rural Australia

AAAA Response to the Consultation on Reforms to improve use and recognition of standards in regulation

The Australian Automotive Aftermarket Association (AAAA) welcomes the opportunity to provide input into the Consultation on 'Reforms to improve use and recognition of standards in regulation'. While we strongly support increased harmonisation by aligning with Australian standards and international standards, ensuring this alignment reflects and accommodates Australia's unique requirements remains a paramount priority.

The Australian automotive aftermarket plays a critical role in adapting vehicles to meet the specific functional, regulatory, and environmental needs of local end users. A significant proportion of vehicles sold into the Australian market, including passenger vehicles, light commercial vehicles, and heavy vehicles, require modifications post-sale to make them suitable for their intended purpose. This includes changes to suspension and ride height for off-road use, modifications for disability access, specialised fit-outs for emergency services and enforcement agencies, and sector-specific adaptations for mining, utilities, construction, and land management.

These modifications are not discretionary or cosmetic. They are essential for ensuring operational safety, compliance with local road rules, and suitability for the unique and often extreme conditions in which Australian vehicles operate. Households and businesses invest heavily in this sector, not only in components but in the technical expertise required to integrate and certify these systems within the framework of existing vehicle design.

Despite this, the standards landscape governing aftermarket vehicle modifications in Australia remains fragmented and highly inconsistent. The current system comprises overlapping and sometimes contradictory requirements drawn from Australian Design Rules (ADRs), Vehicle Standards Bulletins (VSBs), Australian Standards (AS), UNECE regulations, and jurisdiction-specific implementation guides. Each state and territory applies its own interpretation of national guidance, leading to regulatory divergence that undermines consistency, increases costs, and creates barriers to competition and innovation. What results is not merely regulatory complexity but systemic incoherence.

It is also critical to emphasise that global vehicle platforms, particularly those designed for European or North American markets, are not engineered with Australian end-use scenarios in mind. The notion that Australian regulators can simply "lift and apply" overseas vehicle standards, especially those developed under the assumptions of urban, temperate, and standardised operating environments, is flawed. Australia's geographic scale, climate extremes, and multi-purpose vehicle usage patterns demand a standards regime that is responsive, coherent, and fit for local conditions.

Reform in this area is long overdue. A national standards regime for the automotive sector must acknowledge the practical realities of post-sale vehicle modification, reduce unnecessary regulatory divergence, and support safe, efficient, and competitive outcomes for Australian consumers, businesses, and the broader economy.

For any questions relating to this submission please contact

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General Support for Harmonisation

AAAA supports efforts to align Australia's standards with trusted international benchmarks and to streamline overlapping regulations across Commonwealth and state jurisdictions. In general, regulatory harmonisation delivers broad benefits. It lowers compliance costs for businesses operating across borders, reduces time-to-market for new products, and increases competition and product availability for consumers. Harmonisation of some standards can also help Australian producers access export markets more easily and achieve economies of scale by manufacturing to one set of specifications for both local and international markets. We generally agree with the consultation paper's stance that making Australia "one market with one set of rules" through standards harmonisation will enhance Australia's attractiveness for trade and investment.

However, harmonisation for the sake of making conditions easier should not be the goal. We agree with Treasury's view that standards adopted in regulation "must be suitable for use in Australia". Global alignment should not come at the expense of outcomes for Australian consumers or businesses.

AAAA has long championed the need for regulatory consistency between states and territories. Fragmented standards across states create internal trade barriers, confusion, and extra costs for businesses operating nationally. We commend the National Competition Policy for its focus on reducing these inconsistencies. National consistency in standards is the key to helping Australian businesses thrive across borders and ensuring every consumer enjoys the same protections and choice, but this must be achieved through careful, considered reform.

Our Association is already driving this reform, collaborating with the National Transport Commission to review VSB 14, a standard hampered by inconsistent application across states.

Case Study – Vehicle Frontal Protection Systems

Frontal Protection Systems are a clear case study in why Australia needs safeguards when adopting international standards – and why national consistency matters. Inconsistent state-by-state interpretation of the Australian standard creates uncertainty for manufacturers and vehicle owners alike. These systems are not cosmetic; they protect occupants and vehicle front ends in collisions with animals on rural roads and carry essential safety gear such as lights, winches, and antennas for off-road and emergency vehicles.

The regulation of bull bars in Australia has been inconsistent across states and territories, leading to confusion for manufacturers, installers, enforcement agencies, and consumers. There is currently no single national Australian Design Rule (ADR) fully specific to bull bar design. Instead, requirements are found in a combination of federal vehicle standards (notably ADR 42, which broadly prohibits vehicle fittings that increase injury risk) and a voluntary Australian Standard AS 4876.1-2002 for motor vehicle frontal protection systems. In practice, state road agencies have issued their own technical bulletins interpreting these rules, resulting in variations. This leads to uncertainty and compliance issues for bull bar manufacturers and 4WD accessory retailers operating nationwide.

As it currently exists, Western Australia (with its CI-112D circular anchors compliance to AS 4876.1 alongside ADRs), and South Australia (its guidance explicitly "supports and builds upon AS

4876.1-2002"). However, NSW (uses a prescriptive TS-150 technical specification tied to registration law), Victoria (VSI-1 treats bull bars as a modification and sets design/fitment conditions under state regulations), and Queensland (uses the QCOP/Handbook mod-code framework rather than a single FPS standard).

Despite some recent improvements, particularly clearer guidance in Western Australia – much of the variation between states remains ambiguous and, in many cases, unjustified. As AAAA's 4WD Industry Council has warned, legacy differences in other jurisdictions mean a system that is fully compliant in one state could still be deemed non-compliant in another.

Our goal is to achieve a truly workable national standard for Vehicle Frontal Protection Systems that eliminates interstate discrepancies. The consultation paper rightly identifies such domestic disharmony as a barrier that "lowers product availability and increases compliance costs" without clear safety benefits. In the past, public servants proposed harmonising by directly referencing international standards such as UNECE's Global Technical Regulation GTR09 for Frontal Protection Systems, an approach that would have replaced one problem with another, potentially more damaging, one. AAAA strongly opposed this proposal, and following our advocacy, the Minister intervened to ensure it was not adopted in Australia.

Past Industry and Safety Risk from GTR 09

GTR09, developed under the 1998 UN Agreement as a framework to improve pedestrian safety in urban environments, is silent on high-speed animal strike dynamics, does not accommodate the use of structural accessories like winches and lighting equipment, and would have significantly restricted the design of VFPS products essential in rural and remote areas. When its adoption

in Australia was proposed, AAAA demonstrated that it would have severely restricted the aftermarket and hindered industries such as emergency management, which depend on vehicle modifications to operate safely and effectively. As a result of this advocacy, the government did not proceed with adopting GTR09.

Industry Consultation and Engagement — The Essential Safeguard

Reforming standards is complex, and public safety must remain the highest priority. Done well, harmonisation can deliver genuine benefits for government, consumers, and industry. But when departments rush to “align” or “modernise” regulation, unintended consequences often follow.

The most effective safeguard against these outcomes is early and continuous consultation with industry. Our members bring decades of technical expertise, real-world product testing, and a deep

understanding of how standards work in practice across diverse vehicle platforms. This expertise is not a box to be ticked after decisions are made, it must be embedded at the very start of any standards adoption process.

Right now, consultation is neither frequent nor transparent enough to surface and resolve issues before they become costly mistakes. If governments are serious about getting regulation right, industry must be in the room from day one.

This is One of Many Issues with the Fast Adoption of International Standards

Vehicle Frontal Protection Systems are just one example, there are many areas of the automotive aftermarket where adopting overseas standards without modification risks overlooking Australia's unique conditions. Suspension and ride-height rules for off-road and load-carrying vehicles, the requirements for emergency-service and mining fit-outs that demand atypical mounting, power, and PPE interfaces, and the fast-evolving area of aftermarket EV safety systems and workshop procedures all present context-specific challenges.

In each case, the consultation's tests should be applied rigorously: define the objective; determine whether a mandatory standard is the right instrument; prefer international standards where they are genuinely suitable; and, where they are not, adopt or adapt with clear justification based on Australian conditions and a demonstrable net public benefit, but most importantly, engage with industry and listen to industry concerns.

Recommendations

AAAA supports harmonisation that is based on industry and geographical needs. We therefore support and recommend a modest, practical policy direction that avoids change by ministerial/state department discretion.

Any proposal to reference or replace standards that impact the aftermarket should be preceded by structured consultation with industry, enforcement agencies, and representative user groups. Consultation should occur before options are narrowed, so that problem definition and risk assessment benefit from practical experience and the downstream effects of design choices are understood early.

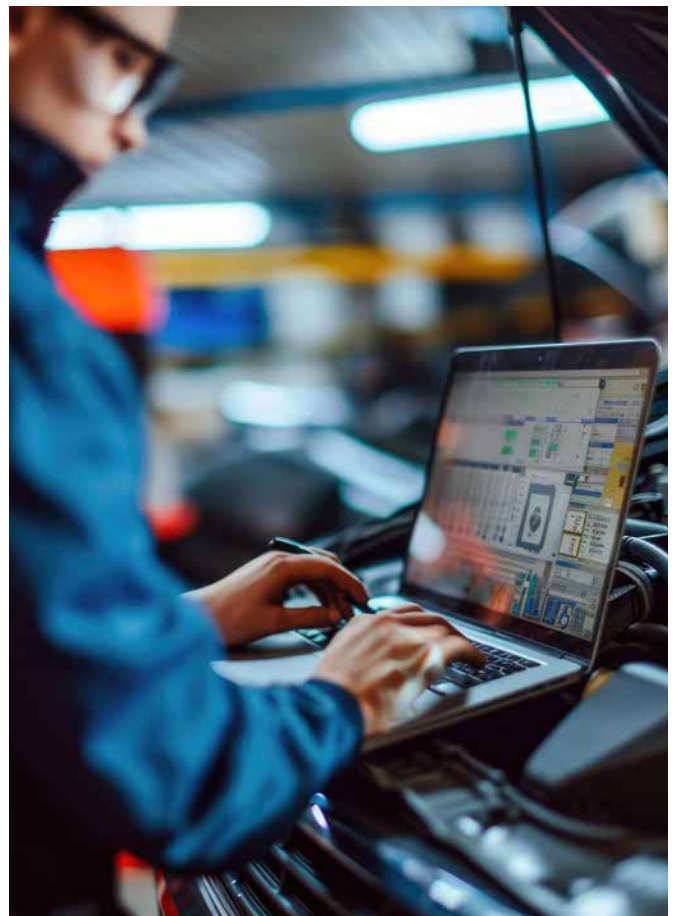
From AAAA's perspective, the Competition Reform Guidelines and the Best Practice Handbook together provide a good procedural base. They require that policymakers articulate the regulatory objective, test whether a mandatory standard is the appropriate tool, prefer international standards only where they are genuinely suitable for Australia, and justify any deviations in terms of net public benefit. They recognise multiple compliance pathways and emphasise stakeholder consultation, transparency, and periodic review.



Conclusion

The AAAA supports harmonisation where it delivers genuine public benefit without sacrificing the safety and functionality that Australian conditions demand. Our case study on Frontal Protection Systems demonstrates why the unmodified import of overseas regimes can be detrimental to Australia. GTR 09's urban pedestrian logic and heavy-vehicle underrun rules did not translate to the needs of industry in Australia, a point we successfully made during our campaign against its proposed adoption. AS 4876.1, by contrast, was written to balance pedestrian protection, SRS compatibility, animal-strike resilience, and accessory integration in precisely the conditions where Australians drive.

More broadly, the consultation's intention to define objectives, prefer international standards only where suitable, consult early, and publish the justification for choices provides a sound pathway for reforms that touch other aftermarket domains such as suspension, towing, specialist fit-outs, and EV safety systems. AAAA stands ready to contribute technical expertise, market insight, and practical experience to that process so that our industry achieves the right balance.





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