



27 February 2026

Australian Rail Industry Standards Organisation
GPO Box 1267
Brisbane QLD 4001

via email: AS7531@ariso.org.au

To whom it may concern,

RE: NFF submission to public consultation on AS 7531 Rolling Stock Lighting and Visibility (Draft)

The National Farmers' Federation (NFF) welcomes the opportunity to comment on the Australian Rail Industry Standards Organisation's (ARISO's) draft AS 7531 Rolling Stock Lighting and Visibility Standard (the Standard).

The NFF is the peak national body representing Australian farmers and, more broadly, the agricultural sector. Our membership includes state farming organisations, national commodity councils and a wide range of associate members across the agricultural supply chain. Through this network, the NFF advocates on behalf of Australian farmers, the agricultural industry and rural communities, including the many farmers and families who interact with the rail network in their daily work and lives.

Australian farmers have a strong interest in the issue of train conspicuity. They make up a significant proportion of rural road users, manage properties that intersect with private level crossings, and operate within an industry that is heavily dependent on rail freight as part of critical bulk-handling supply chains. For the NFF, the safety risk posed by inadequate train conspicuity is the central concern.

The NFF has long supported measures to improve train visibility and to enhance level-crossing safety across rural and regional Australia. The NFF continues to stand with the Improve Train Lighting and Level Crossing Safety Group, a collective of families with lived experience of the devastating consequences of inadequate train lighting. Their decades of advocacy and expertise in this area have been instrumental in elevating this important issue. The NFF lends its support to their calls for practical, proportionate and implementable measures to improve visibility and reduce the risk of collisions.

General comments on the draft Standard

The NFF acknowledges the positive steps taken in the draft Standard, including recognition of the need for improved forward and side visibility, enhancements to livery, and the inclusion of explanatory appendices on visibility principles. These changes are a welcome foundation for strengthening the Standard.

However, to ensure the Standard is fit for purpose and delivers meaningful safety improvements for rural and regional communities, several key provisions require further strengthening. In particular, lighting measures must be clear, consistent, and applied in a

way that ensures trains are as visible as reasonably practicable across the varied environments in which they operate.

A central priority is improved baseline lighting. Flashing forward-facing beacons and side lighting should be mandatory features, as they are essential to achieving consistent and reliable visibility. Road vehicle drivers' decisions at level crossings are often complex, and train visibility can be affected by dawn and dusk conditions, night-time travel, varied approach angles, visual background clutter, adverse weather, or a combination of these variables. No single visibility measure performs effectively in all circumstances. The Standard should adopt a layered approach that supports detection of trains across the full range of real-world operating conditions.

The visibility of wagons also requires significant improvement. While Section 12 of the draft Standard provides some incremental improvement, the proposed requirements remain a bare minimum. Higher-performance reflectors are readily available and, if used more consistently and in greater number, would make wagons significantly easier for road users to detect. At a minimum, reflective performance should be comparable to the standards applied to heavy road vehicles, noting that some rail operations, such as sugar cane trains, already demonstrate that stronger visibility requirements are both achievable and practical. Improving the continuity of reflector placement along wagon lengths would further support reliable visibility, particularly where individual reflectors may be obscured or degrade over time.

The NFF considers it essential that the Standard aims to provide the safest reasonably practicable level of train lighting. Improvements to crossing signs, signalling, enforcement and driver awareness all have value, but they cannot substitute the fundamental requirement that trains themselves be reliably visible. Train visibility is a foundational element of the safety system and should be treated as such.

The NFF also notes concerns raised by community stakeholders regarding the lack of public release of the Monash Institute of Railway Technology research underpinning aspects of the draft Standard. Transparency is essential for informed consultation, and public access to this material would support trust and confidence in the development of the final Standard. The NFF strongly encourages ARISO to publish this research as soon as practicable for stakeholders' consideration.

Finally, to deliver meaningful safety outcomes, the Standard must apply uniformly. A visibility standard that is dependent on voluntary uptake risks inconsistent implementation and leaves rural communities exposed to preventable hazards. For these reasons, the NFF strongly supports a mandatory approach to the application of AS 7531.

Recommendations

To strengthen AS 7531 and ensure it delivers practical visibility improvements, the NFF recommends that the ARISO:

1. Make forward-facing flashing visibility beacons mandatory (Section 4.7).
2. Require visibility beacons and forward visibility lights to activate on when approaching all level crossings (Sections 4.6 and 4.7).
3. Make side lights mandatory on all trains (Section 4.8).
4. Strengthen requirements for reflective delineators on wagons, ensuring they meet a higher standard appropriate for rural operating conditions (Section 12).

5. Include additional appendices describing side lights and forward-facing flashing visibility beacons, to improve clarity and support consistent implementation.

If these recommendations are not adopted, the Standard will fall short of its intent and fail to provide the level of safety and protection that rural communities both expect and reasonably rely on.

The NFF thanks ARISO for its work on this important Standard and for the opportunity to comment. We look forward to continued engagement as the Standard is finalised. The policy contact for this matter is Ms Charlotte Wundersitz, General Manager, Rural Affairs, via e-mail: cwundersitz@nff.org.au

Yours sincerely,

SU MCCLUSKEY
Interim Chief Executive