



25 May 2022

Mr Ian Routcliffe
Standards Development Manager
Rail Industry Standards and Safety Board

Via email: iroutcliffe@rissb.com.au

Dear Mr Routcliffe

PGA Submission on current draft revisions to AS7531 Lighting and Visibility

The Pastoralists & Graziers Association of WA (Inc) (PGA) is a non-profit industry organisation established in 1907, which represents primary producers in both the pastoral and agricultural regions in Western Australia.

As a state farming organisation and representative body for its members, who perforce have to use railway crossings in regional, rural and remote areas, the PGA has a genuine interest in standard setting for lighting and visibility of train sets (engines and wagons/carriages).

According to Main Roads WA, there are some 1,400 public railway crossings throughout Western Australia, and a similar number of non-public (private or occupational) rail crossings.

Whilst it would be best if every one of these almost 3,000 railway crossings were to be controlled at the least by boom barriers and flashing lights, it is incontestable that the great majority of these level crossings have no active protection, only being controlled by STOP or GIVE WAY signs.

Railway crossing upgrades are costly, and at the current rate of upgrades, it will take decades to protect all these crossings.

Therefore, it is important that the operators of train sets assume more responsibility for the safety of the travelling public by adopting the best possible visibility standards for their train sets.

The PGA notes that in Western Australia, movements of Towed Agricultural Implements by night and day are legally required to display a combination of flashing amber lights, reflectors, rear lights, signalling lights and headlights, or daytime running lights, depending on circumstances.

It should be no less for train sets.

The PGA specifically suggests that:

- Locomotives need better lighting, such as rotating beacons, outline lighting, side lighting, and flashing light bars that include dual colours for contrast.
- Wagons need side lighting and higher standard reflectors.
- The colours of engines and wagons need to be changed to be brighter and with strong, clear contrasts. There should no need to change fleet colours if a 'high vis' stripe approach is considered.

Trains sets will need to be maintained and cleaned so that dirt and grime, and graffiti do not obscure lights and reflectors, and be adequately maintained to ensure that lighting and reflectors are functioning as envisaged.

We look forward to working with you to develop these standards, or better ones, as it is imperative that we do not keep losing lives at these crossings.

Yours faithfully



Mr Tony Seabrook
PGA President