

MTAA Submission

Review of Electrical Safety Act 2002

June 2023



ABOUT MTAA

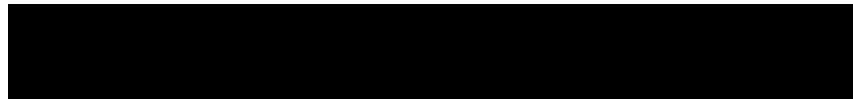
The Motor Trades Association of Australia (MTAA) is Australia's peak national automotive association. MTAA's membership includes the Motor Traders' Association of New South Wales, the Victorian and Tasmanian Automotive Chamber of Commerce, the Motor Trade Association of South Australia and Northern Territory, the Motor Trade Association of Western Australia, and the Motor Trades Association of Queensland.

MTAA represents new and used vehicle dealers (passenger, truck, commercial, motorcycles, recreational and farm machinery), repairers (mechanical, electrical, body and repair specialists, i.e. radiators and engines), vehicle servicing (service stations, vehicle washing, rental, windscreens), parts and component wholesale/retail and distribution and aftermarket manufacture (i.e. specialist vehicle, parts or component modification and/or manufacture), tyre dealers and automotive dismantlers and recyclers.

The automotive industry is a vital contributor to Australia's economy, employing approximately 385,000 people across 13 sectors and 52 trades, and contributing 2.1% of Australia's Gross Domestic Product (GDP). The automotive industry is also one of the largest employers of apprentices and trainees nationally, and the majority of automotive businesses (96%) are small and family-owned enterprises.

CONTACT DETAILS

Steve Bletsos
Senior Research Analyst



Geoff Gwilym
MTAA Interim CEO



MTAA Response - Review of Queensland Electrical Safety Act (2002)

As the national-level body, MTAA represents the unified voice of Australia's automotive industry, identifying and monitoring issues affecting the automotive sector, and informing and advising Government on relevant industry impacts, trends, and proactively participating in the development of sound public policy on issues impacting the retail motor trades, the Australian vehicle fleet and the mobility of our local communities.

MTAA considers it imperative that it respond to the Office of Industrial Relations regarding the final report into the *Review of Queensland's Electrical Safety Act 2002* (the *Review*) and subsequent Discussion Paper sent out for public consultation on 23 May 2023.

MTAA has major concerns with Recommendation 8 presented in the Review, which if implemented, would have significant ramifications for the automotive industry, not just in Queensland but potentially across other jurisdictions.

MTAA Key Positions

Recommendation 8:

For electric vehicles (or parts thereof) falling within the definition of "electrical equipment" (see Recommendations 2 and 4), consider requiring:

- a. appropriately licensed electrical workers to carry out the electrical work on the electrical components when the vehicle is serviced and or repaired, to ensure the safety of owners/operators and community; and
- b. appropriately licensed electrical workers carry out the electrical work on the electrical components of the vehicle when an electric vehicle requires on-road breakdown work to ensure safety of owners/operators, the community and first responders.

MTAA contends that the principles and assertions as described in Recommendation 8, are fundamentally flawed, and MTAA rejects this recommendation in its entirety.

Electric vehicles (EVs) cannot be defined or categorised in the same broad context as other 'electrical equipment'. EV's are highly complex and technologically sophisticated transport vehicles, whose workings represent the complex interplay of specialised mechanical and electrical componentry, as well as artificial intelligence. They cannot be compared and considered to be in the same category as other 'electrical equipment' that any general licensed electrical worker can work on.

EVs can only be serviced, repaired, modified or reprogrammed in a safe and secure manner, by highly specialised automotive technicians who possess both automotive trade training and the requisite EV training and skills. Allowing an appropriately licensed electrical worker to perform any work on an EV without such specialist EV training is fraught with high risk and danger and would jeopardise the impeccable safety record that the automotive industry endures with electric vehicles. An equivalent analogy would be allowing a general medical practitioner (GP) to perform open heart surgery. Whilst they are medically trained, we would not expect a GP to be sufficiently trained to be able to perform open heart surgery without an acceptance of the greater risks involved compared to a specialised surgeon. A mandating of Recommendation 8 would in effect be tantamount to an acceptance of higher risks for automotive workshop owners servicing EVs, which is untenable for the industry.

The automotive industry has a long history of successfully adapting to technological change in a safe and efficient manner. Vehicles with electric propulsion, whether they be hybrid drivetrain vehicles, plug-in-hybrid electric vehicles, or battery electric vehicles, have been in operation on Australian roads for over 30 years. Over this long period, there has not been a single death or injury of an automotive technician, member of the public, first responder or any other personnel due to electrocution from the high voltages in electric vehicles. The automotive industry has a perfect safety record in this respect, and this is due to the specialist training provided by Original Equipment Manufacturers (OEMs) to automotive technicians to allow them to work safely on electric vehicles. This OEM training is further augmented through the development of national electric vehicle qualifications and skill sets delivered by registered training organisations (RTOs), for the upskilling of existing automotive technicians and apprentices in electric vehicle servicing, repairs and workplace health and safety procedures.

The development of the nationally endorsed electric vehicle qualification *AUR32721 – Certificate III in Automotive Electric Vehicle Technology*, has now become the standard pathway for electric vehicle technicians within the industry, including apprentices. This is a rigorous qualification that includes the following units of competency:

- De-powering and reinitialising battery electric vehicles
- Reprogramming vehicle software and firmware updates
- Diagnosing and repairing high voltage rechargeable energy storage systems
- Diagnosing and repairing high traction motors in battery electric motors
- Diagnosing and repairing DC to DC converters in battery electric vehicles
- Diagnose and repair auxiliary motors and associated components in battery electric vehicles
- Diagnose and repair system instrumentation and safety interlocks in battery electric vehicles

General licensed electrical workers do not possess anywhere near this level of training and knowledge to undertake electrical work or repairs on electric vehicles. MTAA is astounded that the Review would even consider allowing appropriately licensed electrical workers to be the final arbiters of EV safety and sign-off in an automotive workshop. Such a policy is ill-thought and ill-advised and will be of detriment to the automotive industry and is not supported by MTAA.

MTAA therefore rejects Recommendation 8 in its entirety, as it is based on a series of flawed assumptions and an ill-informed understanding of existing skill requirements and training regimes for electric vehicles within the automotive industry, including the perfect safety record that the industry possesses that is a testament to the quality and rigour of this training.

Other Issues

Another key failing of the Review and Discussion Paper, is that there has been no consultation with the automotive industry at any stage. Neither the peak automotive body in Queensland - the Motor Trades Association of Queensland (MTAQ) - nor the national body MTAA, have received any communication or correspondence from the Office of Industrial Relations or the Queensland Government about their intention to Review the Electrical Safety Act 2002, and its implications for the automotive industry.

Considering that the automotive industry is a key stakeholder in the process whose operations may be unduly affected, industry consultation should have been a designated priority early on, yet there is no record of such consultation taking place with the peak industry bodies - MTAQ and MTAA.

MTAA asserts that public monies have been wasted on a review that has failed to engage and encompass key stakeholders.

Industry impacts

MTAA advises that if Recommendation 8 of the Review was to be mandated, it would immediately have a negative impact on the profitability and sustainability of many Queensland businesses, particularly small business. Given that workshop floorspace is at a premium, automotive businesses cannot afford to be held up waiting for appropriately licensed electrical workers to arrive to before they can commence working on EVs, nor can they afford the financial costs associated with the implementation of such a measure. MTAA estimates that potentially over 9,000 Queensland automotive service and repair businesses will be adversely affected in this manner, with as many as 2,000 automotive businesses expected to become unviable and close as a result of this policy, along with the associated loss in employment and apprentice uptakes.

Consumers will also be negatively impacted by Recommendation 8, in that they will experience greater disruption and delays in getting their EV serviced or repaired, if a reliance on third party electrical workers to complete any EV related work was mandated through the policy. Furthermore, the added financial costs of engaging a third party in the process will ultimately be borne by the consumer, as many businesses will not be able to absorb these additional costs and will be compelled to charge higher costs for EV servicing and repair work.

Conclusion

MTAA strongly contends that there is no case for intervention as proposed in Recommendation 8 of the Review. Beyond the installation and repair of EV charging stations and other associated infrastructure, electrical workers have no place in the direct servicing or repair work related to EVs in an automotive workshop. Anything to the contrary will jeopardise the impeccable safety record of the industry and will place unnecessary financial strain on both small businesses and consumers, which is an undesirable outcome.

MTAA strongly advises the Queensland Government to engage more closely with MTAQ and MTAA to develop a workable solution regarding regulation and policy in Queensland for servicing and repairing electric vehicles.