

Review of the Electrical Safety Act 2002 Discussion Paper Australian Automotive Aftermarket Association Response.

Introduction

The Australian Automotive Aftermarket Association (AAAA) welcomes the opportunity to respond to the 'Review of the Electrical Safety Act 2002' Discussion Paper. This discussion paper deals with a wide range of electrical issues, however our submission will focus primarily on section 3.3 of the discussion paper '**Electrical Safety and Electric Vehicles**'.

AAAA would like to express our disappointment in the consultation process. Many of the points highlighted in the following response could have been discussed prior to the release of this discussion paper. Instead, this paper has caused a great deal of unease in the automotive service and repair sector in Queensland. While this consultation paper is a public policy debate and not government policy, the deliberations contain highly disturbing recommendations that were conducted without consultation with the automotive industry.

AAAA and our members have highlighted several issues with both the underlying assumptions and the recommendations made in this Discussion Paper regarding the Electrical Safety Act (2002).

Responding to safety concerns that are outlined in this discussion paper.

AAAA does not refute that there are safety concerns that arise when dealing with electricity and high-voltage systems. However, claims that are made in this discussion paper at times are unfair and inaccurate and portray the qualified, safe and professional work and knowledge that the automotive service and repair industry has been undertaking for decades. The Australian automotive service and repair industry has been operating with high-voltage systems in vehicles for over 30 years.

The Industry Complies with AS 5732.

"AS 5732 Electric Vehicle Operations - Maintenance and Repair' contains a new safety framework for independent service and repair workshops including workshop layout, specialised tools, and protection equipment for technicians to safely and efficiently service and repair EVs."

Australian Standard 5732 is based on the international standard for servicing and repairing Electric Vehicles. This standard covers a comprehensive set of requirements that Australian automotive repairers comply with prior to and during the service and repair of an Electric Vehicle or Hybrid Vehicle, thus ensuring that the vehicle is fit for purpose after service and that the safety of the technician servicing the vehicle and those in the workshop is paramount.

Australian Standard 5732 'Electric Vehicle Operations' is incorporated into the structure of the mandatory training unit: AURETH101 (Depower and Reinitialise battery electric vehicles). This unit provides the skills and knowledge required to depower and reinitialise battery electric vehicles (BEVs). It involves ensuring the vehicle high voltage (HV) rechargeable energy storage system (RESS) is isolated before commencing any service or repair work. It also involves calibrating vehicle systems that may need resetting once the energy storage system is reinitialised. Importance is placed in the unit on applying RESS and separated extra low voltage (SELV) electrical safety procedures.

This is a course unit that all vehicle technicians are required to complete in order to access the vehicle manufacturer's authorised vehicle data through the Australian Automotive Service and Repair Authority (AASRA) and is required under the *Motor Vehicle Service and Repair Information Sharing Scheme Act 2021*.

Overview of requirements for the Automotive service and repair industry working on Electric Vehicles.

Prior to examining the issues that AAAA has with points raised in the discussion paper, we believe that it will be useful to provide an overview of the current requirements for EV service and repair.

As highlighted in the discussion paper all Australian states and territories have not sought to limit work on EV's to electrical licence holders. New South Wales in their recent Statutory Review of the Gas and Electricity (Consumer Safety) Act 2017 did not include any provisions to limit EV work to electrical licence holders.

This legislative framework in which the automotive industry complies with the Australian Standard, completes mandatory safety training, and has access to authorised vehicle data is in line with discussions that AAAA regularly conducts with State and Federal regulatory agencies.

Feasibility of requiring licensed electrical workers for EV work

The collective service and repair industry is evolving to meet the increase in zero and low-emission vehicles, with workshops progressively investing in tools and equipment, modifying the workshop floor space, and undertaking the required training to undertake EV and Hybrid service and repair work.

As this Discussion Paper does correctly note, as vehicles age, car owners are more likely to go to an independent automotive technician to undertake service and repair work. Our ongoing research reveals that the overwhelming consumer sentiment for the selection of an independent mechanic is due to trust: Car owners trust that they will get the highest quality of work done for a fair and reasonable price. Trust that will erode if services are undertaken by non-qualified technicians.

The feasibility of requiring licenced electrical workers to undertake work on Electric Vehicles fails at several points:

1. Lacking the legislative context automotive service and repair in Australia.

AAAA believes that skilled automotive technicians are the only professionals that are qualified to conduct service and repair on motor vehicles, whether these are ICE vehicles or Electric vehicles.

All motor vehicles present complexity that only a skilled automotive technician is trained to diagnose and provide remediation.

The new Federal Government legislation: The Motor Vehicle Information Scheme is a mandatory scheme that restricts the provision of vehicle manufacturer data to the automotive industry, this includes all safety and security information¹. Under the amendment to the Competition and Consumer Act 2010 motor vehicle service and repair information is made available to all Australian motor vehicle repairers. This information provides automotive technicians with access to service and repair information. This includes:

- information needed to service and repair cars.
- software updates that help to connect a new spare part with a car.
- information and codes for computerised systems from a car manufacturer.

¹ 5. Meaning of safety information

Kind of information relating to a system that is safety information for a scheme vehicle.

(1) For the purposes of subsection 57BF(2) of the Act, the kind of information prescribed for a system covered by that subsection is all scheme information relating to that system.

Note: The systems covered by subsection 57BF(2) of the Act are the hydrogen system, the high voltage system, the hybrid system, the electric propulsion system and any other prescribed system (see subsection (2) of this section).

Additional prescribed systems

(2) For the purposes of paragraph 57BF(2)(e) of the Act, each system connected to any of the following systems is prescribed:

- (a) the hydrogen system;*
- (b) the high voltage system;*
- (c) the hybrid system;*
- (d) the electric propulsion system.*

This OEM data and information access to undertake a full-service is only granted to automotive technicians or to automotive training providers under the legislation and the Scheme Rules.

Without access to the Electric vehicle car manufacturer's authorised repair information, there is a risk that the non-automotive technician conducting work will cause damage to the vehicle and may indeed provide for an increased OH&S risk.

2. Direct impact on labour and repair delay times

The proposal that only licensed electrical workers should undertake work on electric vehicles will be catastrophic for motorists that own an electric vehicle. Licenced electrical workers are already in a severe labour shortage in Queensland as highlighted by Jobs and Skills Australia (JSA). With major proposed projects including the 'CopperString 2.0' and a further rollout of Queensland's EV charging network, AAAA fails to see how putting more strain on licenced electrical workers for no benefit to workplace safety or motorists is a reasonable proposal.

With current industry shortfalls, if implemented, this proposal will have a significant impact on the availability of who can undertake service and repair work on electric vehicles which will directly impact the uptake of these vehicles.

The impact on labour and costs were not mentioned in this discussion paper. It is assumed that a full Cost Benefit Analysis would be conducted prior to or during a government consideration of the recommendations from the Electrical Safety Office.

3. The balance between safety, industry growth, and consumer confidence

The automotive aftermarket industry's extensive network provides consumers with the convenience of local, trusted, and cost-effective service and repair options. Imposing a requirement for licensed electrical workers would significantly limit these options, leading to increased costs and waiting times, and will disrupt the uptake of electric vehicles.

A holistic approach, one that genuinely considers all facets of safety, industry growth, and consumer confidence, is critically needed in place of this unfairly skewed proposal.

AAAA Responses to Discussion Paper Questions

1. How are you, your organisation, the workforce or community affected by the problems identified and to what extent?

The AAAA represents the aftermarket industry, which includes the independent service and repair industry. AAAA believes that the ESO's view of high voltage service and repair is narrow and we would welcome you at any one of our member workshops to show the detailed automotive knowledge that is required to conduct the diagnosis, repair and service of Low and Zero Emission Vehicles.

2. Do you agree with the assessment of the problem identified, and are there additional risks presented by electric vehicles that have not been identified? If yes, what are they and can you provide examples of these issues?

AAAA agrees that safety is of paramount importance when working with high-voltage systems in EVs, however, we dispute the assessment of the problem as presented in regard to EVs. The assertion that the service and repair industry is not equipped to safely handle these systems overlooks the rigorous safety measures already in place. For decades, this industry has worked competently with high-voltage systems, developing refined safety protocols aligned with international standards, such as Australian Standard 5732.

Further, the paper fails to recognise that by isolating the electrical component of EVs and advocating for licensed electrical workers, it overlooks the unique, comprehensive skill set that automotive technicians possess. These technicians have detailed knowledge about the whole vehicle's functioning, not just the electrical components, which is crucial for safe and effective EV servicing and repair.

Additionally, the discussion paper does not adequately address the potential risks posed by allowing unqualified individuals or those without automotive expertise to perform work on EVs. The risks are not just confined to electrical safety. Mishandling could lead to severe vehicle malfunction, endangering the safety of vehicle users and other motorists.

The paper also neglects to identify the potential economic and social risks of the recommendations. Restricting work on EVs to licensed electrical workers could slow down the uptake of electric vehicles due to increased costs and waiting times for service and repair. Moreover, it could lead to job losses in the service and repair industry and potentially hamper the growth of the Low and Zero Emission Vehicle market in Australia. These broader implications require thorough consideration in discussions around EV safety regulations, something that this paper fails to do.

3. What practical impact, including the costs and benefits, would the options proposed in the Discussion paper have on you, your organisation, the workforce or the community? Please provide examples where possible.

AAAA believes that a full cost-benefit analysis should be undertaken by an independent body that incorporates both the electric and automotive industries.

4. What is your preferred option and why would it be best for you, your organisation and your stakeholders?

AAAA believes that this review and the subsequent discussion paper is a result of a lack of automotive industry consultation. As a result, AAAA cannot support a preferred option and instead proposes that.

- a) The Government reject the recommendations of the Review and Discussion paper relating to Zero and Low Emission Vehicles.
- b) The Department of Main Roads and Transport lead any future work relating to Zero and Low Emission Vehicles in consultation with the Automotive industry.

About the Australian Automotive Aftermarket Association

The Australian Automotive Aftermarket Association (AAAA) is the national industry association representing automotive parts manufacturers, replacement and service auto parts distributors, wholesalers, importers and retailers of automotive parts and accessories, tools and equipment, and providers of vehicle service, repair, and modification services in Australia. Our industry supports car owners after the purchase of the car - keeping their vehicles safe and providing products for modification to make vehicles fit for purpose, including trade and emergency vehicles.

Everything that happens to the car after the initial purchase is part of the Australian automotive aftermarket sector. We also advise consumers on when their vehicle has reached the end of useful life and we provide advisory services on which car would be suitable for their next purchase. We often support consumers and fleets for lengthy periods of time - when you find a trusted service provider, you normally keep them.

The independent aftermarket is a significant segment of the automotive industry and in most cases, parts supplied to the consumer through distribution channels alternative to the motor vehicle dealer networks are of an equivalent (or in many cases superior) quality and are fit for the purpose intended. A significant number of AAAA members also produce automotive parts that are used in the original build of the vehicle, and products that are sold by new car dealerships as OEM parts.

The AAAA is a nominating organisation on 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. The AAAA and our member companies passionately defend the reputation and integrity of the independent aftermarket and stand by our products and professionalism.

We have strong relationships with state and federal regulators and regularly disseminate information to members on relevant legislation and standards to assist them with their compliance obligations.

Please don't hesitate to contact me directly at [REDACTED] to discuss this further.

Sincerely,

[REDACTED]

Australian Automotive Aftermarket Association