
FCAI response to:
Queensland Electrical Safety Office
Discussion paper on Review of
Queensland's Electrical Safety Act 2002
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1.0 INTRODUCTION

The Federal Chamber of Automotive Industries (FCAI) is the peak Australian industry organisation representing the importers and distributors of over 99% of light duty passenger vehicles and light commercial vehicles up to 3.5t Gross Vehicle Mass (GVM) and motorcycles sold into the Australia market.

The FCAI members provide maintenance and repair services of their vehicles through their authorised network and also support independent providers and Registered Training Organisations by making available technical information and vehicle diagnostic solutions in compliance with the Motor Vehicle Information Scheme.

The FCAI welcomes the opportunity to provide feedback on the Discussion Paper that presents the recommendations of the Review of Queensland's Electrical Safety Act 2002 Final Report. We understand that the key outcome of this round of consultation aims at informing the Queensland Government in its decision-making process.

As flagged in the Discussion paper, the Australian vehicle fleet is changing and will continue to do so in response to the Queensland Zero Emission Vehicle Strategy 2022-2032, the Zero Emission Vehicle Action Plan 2022-2024, and other initiatives at the state and federal levels. The light vehicle fleet is increasingly introducing a range of electrified powertrains containing some form of traction battery, including Non-Plug-In Hybrid Electric Vehicles (HEV), Plug In Hybrid Electric Vehicles (PHEV), Battery Electric Vehicles (BEV) and Hydrogen Fuel Cell Electric Vehicles (FCEV).

As such, we acknowledge the evolving risk environment around motor vehicles and commend the Queensland Government and the Electrical Safety Office for undertaking this Review of the Queensland Electrical Safety Act 2002.

FCAI's response focuses on section 3.3 Electrical Safety and Electric Vehicles (EVs). In particular, Recommendation 8 from the Review is of concern to the FCAI, its members and the broader automotive industry.

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.*

2.0 FEEDBACK

Restricting service and repairs of EVs to licensed electrical workers as per Recommendation 8 would lead to major disruptions to consumer services, and increase costs of vehicle repair and maintenance services. It is also likely this may create risks with the potential of harm to the electrical workers and the vehicles considering electrical workers do not necessarily have specific automotive training and knowledge. The application of this recommendation has the potential to damage the automotive industry as a whole, and ultimately slow down the introduction of low and zero emission vehicles in

the Australian fleet as servicing EVs becomes less accessible, less convenient and more expensive for the vehicle owners.

In addition, such requirement would put Queensland at odds with international best practice on EVs with other markets applying their effort to adapting and upskilling their automotive industry to safely continue to service vehicles with consideration of powertrain technologies available in their markets.

We consider it is critical that EVs continue to be serviced and repaired by a highly skilled, competent and efficient automotive industry workforce.

- Licensed electricians would require significant training in automotive to be competent to service and repair EVs as their current skills are not aligned to the skills needed to work on EVs. Without the provision of significant, costly and specific automotive training, electrical workers would be put at great risk if they were to work on EVs.
- Safety is at the core of everything the automotive industry does. The industry has continuously and successfully adapted to the change in vehicle technologies, especially since the first modern hybrid electric vehicles entered the market from 2000. More practically, the FCAI members commonly develop and deliver the necessary training to ensure the safety of the workforce allowed to service and repair new vehicles launched to market.
- The automotive industry has now put in place a graduated approach to preparing and training the automotive workforce on EVs through non-accredited EV training on awareness and safety for automotive workers that work around or near EVs. This training is delivered through nationally recognised accredited training delivered by registered training organisations. This includes training for automotive technicians to depower, find & rectify faults and repower electric vehicles safely and to industry and manufacturers standards.

FCAI is supportive of Option 1 “maintaining the status quo” in that only qualified automotive technicians with the required EV related training are able and allowed to service and repair EVs.

FCAI is supportive of Option 2 “proposes a legislative change” on the assumption that the restricted electrical license is introduced and accessed only by automotive technicians who have completed the required EV-related training. Due consideration of the training packages developed to date by the automotive industry (e.g. AURETH101 Depower and Reinitialise battery electric vehicles, AURSS00063 Battery Electric Vehicle Diagnose and Repair Skill Set, AUR32721 Certificate III in Automotive Electric Vehicle Technology) into this licensing framework would be required.

FCAI is also supportive of Option 3 “awareness and education campaign” on the assumption that the campaign clearly advises that service and repair of EVs is to be undertaken by appropriately qualified automotive technicians. Caution would be required not to raise unnecessary concerns that could negatively impact consumers in their choice of powertrain technologies.

We regret the lack of apparent engagement with the automotive industry throughout this review but remain available for further discussion as required.

END OF FCAI SUBMISSION