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To whom it may concern,

RE: Energy Safety Review

The Victorian Automotive Chamber of Commerce (VACC) welcomes the opportunity to provide a response to the Energy Safety Review, led by the Department of Energy, Environment, and Climate Action (**DEECA**).

VACC is Victoria's peak automotive industry association, representing the interests of more than 5,000 members across 15 retail automotive sectors that employ over 50,000 Victorians. VACC also employs over 550 auto apprentices through its Group Training Scheme. VACC is a key contributor to national automotive industry industrial relations discourse, and maintains a well-resourced automotive industry policy presence.

VACC provides the following feedback for consideration by DEECA.

E-bikes and scooters

E-bikes represent a rapidly growing category of energy-powered mobility devices; however, without appropriate regulation and enforcement, they may pose significant safety risks.

VACC is concerned by the increasing number of e-bikes being imported into Australia for personal and commercial use that do not comply with Australian Standards or Australian Design Rules (ADRs). These non-compliant products are often more powerful than legally permitted, may be equipped with inadequate braking systems, and are sometimes manufactured using substandard materials or untested components—particularly batteries and chargers. In many cases, consumers are unaware of the appropriate use and maintenance of these elements, compounding the potential safety hazards for riders, pedestrians, and the broader community.

These concerns are also reflected in the Consultation Paper, which highlights ongoing challenges in managing the safety compliance of imported renewable energy products, including electric mobility devices such as e-bikes and e-scooters. The Consultation Paper notes that although Energy Safe Victoria has broad regulatory powers, the current framework still struggles with timely intervention at the border—allowing high-risk, non-compliant products to freely enter the market.

VACC supports enhanced enforcement of existing legislation, stricter customs inspections, and greater alignment with national product safety standards.

End-of-life vehicle strategy

Each year, over 750,000 vehicles reach the end of their economic life, creating more than one million tonnes of waste. The number of internal combustion engine vehicles that will be removed from Australia's roads is expected to grow exponentially in the coming years.

VACC, and its dismantling and recycling member businesses, have dedicated substantial resources and are currently collaborating with government to identify options for government to introduce an End-of-Life Vehicle (ELV) program to Australia. The importance of better ELV management has only increased and will continue to do so in line with government policy related to the increased uptake of zero and low emissions vehicles. This, coupled with increasing community expectations relating to sustainability and the environment, makes this an area for urgent reform.

The Consultation Paper notes that Victoria already regulates battery disposal through the e-waste landfill ban, however VACC agrees with the Review's decision to take a "whole of lifecycle" approach – which means acknowledging that motor vehicles are primarily manufactured overseas.

VACC therefore recommends, at a minimum, a nationally coordinated and harmonised standard set of procedures that deals with the proper disposal of end-of life vehicles, including the safe and proper disposal of electric batteries be led by the federal Environmental Protection Agency of Australia, with engagement and support from other relevant state and federal departments.

Reforms 7 and 8 - Victoria's licensing classifications for plumbers and electricians

VACC disagrees with reforms to introduce licencing classifications for repair and maintenance workers on electric vehicles (EVs). There is no clear policy rationale for introducing additional regulation to the motor vehicle repair industry, and specifically to the repair of EVs. VACC considers that regulation, such as occupational licencing, should only be imposed when there is strong justification and evidence of a market failure. We note that one of the key initiatives outlined in the 2024 Victorian Economic Growth Statement is to cut red tape, making it simpler to do business in Victoria. Imposing further, unjustified regulation does not align with this objective.

EV Technicians are responsible for the repair, maintenance, and diagnostics of electric and hybrid vehicles. They possess training and knowledge about electric drivetrains, voltage storage systems, battery technology, electric motors, and power electronics. Their expertise lies in dealing with the unique challenges and safety considerations associated with EVs. This work is fundamentally different to that of an electrician.

There are currently no specific registration or licensing requirements for EV Technicians in Victoria. However, with the development of the AUR32721 Certificate III in Automotive Electric Vehicle Technology qualification, there is now a formal training pathway for automotive apprentices. There are also a number of upskilling pathways available through the relevant skillsets (for example, AURSS00037 - Hybrid Electric Vehicle Inspection and Servicing Skill Set; AURSS00063 - Battery Electric Vehicle Diagnose and Repair Skill Set; AURSS00064 - Battery Electric Vehicle Inspection and Servicing Skill Set). VACC also notes that Australian Standard AS 5732:2022 *Electric vehicle operations — Maintenance and repair* provides safety requirements and guidance on the appropriate ways of handling repairs for EVs.

VACC considers that this training and guidance, in addition to the strong safeguards already established under existing Work Health and Safety (WHS) legislation and Australian Consumer Law, have proved sufficient to protect the interests of both EV Technicians and consumers.

Skills shortages in the Australian automotive industry

Victoria is currently experiencing a tight labour market with evidence of extensive skills shortages across many occupations. Skills shortages are a particular issue for the automotive retail industry.

The VACC recently commissioned Deloitte Access Economics to prepare a report detailing the extensive skills shortages experienced across multiple occupations within the automotive sector. Amongst the 161 Victorian automotive businesses responding to the survey, over 600 vacancies were advertised in 2024 of which just 237 were filled, with an average industry fill rate of just 37 per cent – well below the 67% threshold Jobs and Skills Australia (JSA) uses to determine occupational shortages. This figure raises concerns regarding the future service and maintenance of an increased EV fleet in Victoria, given the Victorian Government has set a target of 50 per cent of all new light vehicle sales to be zero-emissions vehicles by 2030.

VACC considers that introducing licensing requirements for EV Technicians may create barriers to entry that exacerbate existing skills shortages. The process of obtaining a license can be costly and time-consuming for workers. For individuals who may already possess the necessary skills, the additional burden of meeting licensing requirements can delay their entry into the workforce, contributing to delays and ultimately driving up costs for consumers. This will particularly disadvantage regional vehicle owners, who may be left with limited options for EV repair and maintenance.

VACC maintains its willingness to work with the DEECA as the review progresses.

Yours faithfully

Dr Imogen Garcia Reid
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VACC