



**AUSTRALIAN AUTOMOTIVE
AFTERMARKET ASSOCIATION**

**Australian Automotive
Aftermarket Association Ltd**

A.B.N. 23 002 271 454

7 Bastow Place
MULGRAVE VIC 3170
P: 03 9545 3333
F: 03 9545 3355
E: info@aaaa.com.au

Service NSW
GPO Box 7057
SYDNEY NSW 2001

Via email to: motordealersandrepairersact@customerservice.nsw.gov.au

**RE: Proposed introduction of Light Electric Vehicle mechanic and Heavy Electric Vehicle
mechanic repair classes in NSW**

The Australian Automotive Aftermarket Association (AAAA)

The AAAA is the peak industry body representing Australian businesses in the development, manufacture, export, import, retail and fitment of automotive products, modifications and accessories, and automotive repair and service businesses. We represent over 5,000 businesses Australia-wide, and pride ourselves on maintaining open and constructive dialogue with all levels of government to improve outcomes for Australian industry and consumers alike, as well as assisting government in the development of effective policy, legislation and regulations.

We welcome the opportunity to engage in consultation with the Department on this proposal.

Response to the Consultation Paper

i. Process

We believe that this proposal, which constitutes a large-scale reform of the *Motor Dealers and Repairers Act 2013* and *Regulation 2014*, should be included in a broader discussion and review of the Act and Regulation, rather than a short standalone consultation period. The scheduled review of the Act and Regulation in 2023 provides an opportunity for this proposal to be addressed with appropriate consultation and in the full context of a holistic review.

ii. Business analysis

The Consultation Paper lacks a thorough business analysis that outlines the practicalities of this change, including how it would affect the training system and the expected costs to government and businesses. Without detailed research investigating the potential effects of large-scale changes, it is difficult to provide a clear and definitive industry position on many aspects of the proposal.

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iii. Expected failures of current scheme

The Consultation Paper does not provide a detailed explanation of the expected failures of the current qualification scheme which would constitute the necessity for such changes. EVs are already on our roads and are being repaired by our industry. Most components of EVs are the same as those on ICE vehicles, and training courses are available which cover safe practices for working with high voltage vehicle components.

The Commonwealth Government's Motor Vehicle Information Scheme regulates the provision of data critical to working on all vehicles, including EVs, and requires each technician requesting data relating to high voltage vehicles to provide evidence of completion of a high voltage vehicle safety course (AURETH101 or equivalent). The ACCC is responsible for enforcement of these rules and can issue penalties up to \$10 million for breaches.

Recommendations

- 1. Include AURETH101 as the only additional requirement for the EV repair class**
- 2. Work with the Australian Automotive Service and Repair Authority (AASRA) to harmonise OH&S safeguards**
- 3. Include this consultation as part of the review into the Act and Regulation in 2023**

Response to questions

- 1. Does the proposed scope of the new repair classes cover the elements of repair work required by an EV? Should there be changes to the scope?**

Australian Automotive Aftermarket Association does not support the introduction of the new repair classes as described in the proposed scope. In our view, the consultation paper does not provide the required rationale for the introduction of new repair classes. It is not clear from the proposed scope if the requirement for mandatory pre-requisites for EV servicing arise from concern regarding occupational health and safety, or if the requirement for government intervention arises from concern about competency and proficiency.

Effectively, in our view the proposed scope does not provide enough information on the 'why'. The Proposed Scope is wide ranging, has clear and significant implications for our industry and yet the case for this level of government intervention is unclear. Within our industry EVs and Hybrid vehicles are an existing and growing proportion of our customer base. In the experience of our national banner groups, EV vehicles share many service and maintenance components of ICE vehicles, that is, the large majority of the current Australian car parc.

Any proposed scope should be specific about which components and what servicing is under investigation because in our view, on the workshop floor, the key difference between ICE and EV servicing is the method of propulsion. The variance, therefore, is the requirement to safely power

down and power up the battery. If the consultation paper is attempting to address a concern regarding Occupational Health and Safety, then this concern might be addressed more effectively by working with the Australian Automotive Service and Repair Authority (AASRA). AASRA is developing the mandatory requirement for the AURETH101 completion which is a requirement in order to qualify for service and repair information for EVs including software updates. As AASRA is a national body, which would cover the OH&S component of working with EVs, it is unclear why NSW would require a state specific program.

2. What has the demand been like for current offerings?

Many of our member businesses in New South Wales have reported difficulty finding availabilities in electric vehicle courses, particularly AURETH101 – Depower and reinitialise battery electric vehicles. This is likely because demand has increased as EVs increase in market share and the training is now required to access vehicle data for high voltage vehicles. Without a detailed business analysis mapping expected demand and availabilities for courses, we are concerned that this proposal could be unnecessary pressure on the training system and drive adverse outcomes for businesses and consumers.

3. What would be the impact of bridging (only requiring part of the Certificate III for existing tradesperson certificate holders in internal combustion engine vehicle repair work to also work on EVs)? Should bridging courses be considered?

Should this proposal be put into practice, bridging courses would be essential to mitigate adverse outcomes for businesses, employees and consumers. It is entirely impractical to force fully qualified technicians, many of whom with decades of experience, to complete another four-year training course to continue their work, especially considering most of the competencies in the new course are covered in the existing courses required for qualification.

4. If so, what elements of the Certificate III should be required for the upskilling of motor mechanics and other classes of repair which may require service and maintenance aspects of the course?

Technicians should be able to safely depower and reinitialise high voltage vehicle systems. However, a safeguard ensuring this competency already exists in the federally legislated Motor Vehicle Information Scheme.

5. What elements of the Certificate III should be required for other classes of repair work (e.g. vehicle painter, panel beater etc)?

AURETH101 - Depower and reinitialise battery electric vehicles only.

6. Are there any classes that do not require upskilling?

All classes require a risk assessment and any work that requires the technician to depower and reinitialise the battery should undertake AURETH101 - Depower and reinitialise battery electric vehicles.

9. How long should the transitional arrangements be in place?

Seven to ten years to ensure industry is afforded time to upskill and the training system can offer enough availability.

10. Is there anything you would like to add on any aspect of the Consultation Paper?

We are very concerned that this proposal may lead to unintended consequences for repair businesses, also affecting technicians and consumers. Our industry is already dealing with a significant shortage of qualified technicians, and enforcing retraining of the entire workforce will put further strain on businesses, and potentially increase costs for motorists. It will also hamper New South Wales's transition to clean energy, as it will disincentivise repair businesses from working on EVs, reducing availability and increasing costs for upkeep.

We do not oppose working with government to improve the training and qualification schemes to promote best practices in our industry. However, mandating retraining to this degree will not achieve this goal. We support these training courses being available for technicians who wish to advance and specialise their skillset, which will provide businesses with opportunities to improve their service offering to motorists without the adverse effects of a mandate.

We are also concerned that this proposal would disadvantage New South Wales businesses and consumers compared to other states. These restrictions are unparalleled across the country, and would place New South Wales behind in terms of ramping up the support for the growing number of EVs in Australia's vehicle fleet. The entire automotive supply chain needs to be agile and responsive to market changes, and this proposal would hamper the New South Wales industry's ability to grow with the market.

For more information

AAAA National Office
7-8 Bastow Place
Mulgrave VIC 3170
info@aaaa.com.au

Stuart Charity
CEO
scharity@aaaa.com.au

Lesley Yates
Director of Government
Relations and Advocacy
lyates@aaaa.com.au