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Office of Industrial Relations Queensland
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RE: Review of Queensland's Electrical Safety Act (2022)

The Australian Chamber of Commerce and Industry (ACCI) appreciates the opportunity to comment on the Review of Queensland's Electrical Safety Act (2022).

ACCI is Australia's largest and most representative business association. Our members are all state and territory chambers of commerce, which in turn have 430 local chambers as members, as well as over 70 national industry associations. Together, we represent Australian businesses of all shapes and sizes, across all sectors of the economy, and from every corner of our country.

We recognise that in an environment of rapid technical change it is important those working on electrical equipment have the appropriate training to ensure the safe operation and maintenance of the equipment. In general, we are supportive of the intent with the changes to the Electrical Safety Act (2022).

Our members, the Motor Trading Association of Australia (MTAA) and the Victoria Automotive Chamber of Commerce (VACC) have raised concerns with Recommendation 8 of the Review of the Electrical Safety Act (2022), regarding the maintenance of electric vehicles (EVs). ACCI share their concerns.

EVs and hybrids are becoming increasingly common on our roads and their use will continue to grow rapidly as we transition towards net zero by 2050. Yet, it is important to be aware that they have been present on our roads for almost 30 years. In that time, the automotive sector has trained and developed highly specialised automotive technicians to service and maintain these vehicles.

This training was initially provided by the original equipment manufacturers (OEMs), through specialist training to enable automotive technicians to safely, competently and proficiently maintain and repair their vehicles. More recently the sector has developed a nationally endorsed electric vehicle qualification *AUR32721 – Certificate III in Automotive Electric Vehicle Technology*. This has become the standard pathway for electric vehicle technicians within the industry, including apprentices. All technicians working on EV are required to hold this qualification.

Electric vehicles are highly complex and sophisticated technology, that involve the interplay of both mechanical and electrical componentry. They are very different to other electrical

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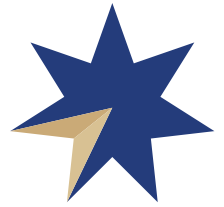
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equipment. To service, repair, modify and reprogram an EV in a safe and secure manner requires a highly specialised automotive technician, with the requisite automotive trade training. It is not something that is suited to a generalist licenced electrical worker, with a limited understanding of the full operation of an EV.

The Australian Chamber of Commerce and Industry counsels strongly against the adoption of recommendation 8 of the Electrical Safety Act (2022) Review. General licensed electrical workers do not have the appropriate level of training and specialist knowledge to undertake electrical maintenance or repairs on EVs. Allowing general licenced electrical workers to do this work represents a considerable safety and operational risk for the worker and the EV.

Only automotive technicians with the requisite training through the nationally endorsed *AUR32721 – Certificate III in Automotive Electric Vehicle Technology* qualification should be authorised to service, repair, modify and reprogram an EV.

Yours sincerely

David Alexander
Chief of Policy and Advocacy