



**AUSTRALIAN AUTOMOTIVE
AFTERMARKET ASSOCIATION**

Australian Automotive Aftermarket Association (AAAA)

**Submission to the NSW Government:
Response to the Proposed Changes to the
Motor Dealers and Repairers' Regulation 2025**

Mandatory Skill Set for Electric Vehicle Servicing

May 2025



PREFACE

The Australian Automotive Aftermarket Association (AAAA) welcomes the opportunity to provide feedback on the proposed changes to the Motor Dealers and Repairers Regulation 2025. The automotive aftermarket is an essential part of the vehicle ecosystem, responsible for maintaining road safety, supporting vehicle longevity, and ensuring vehicle compliance across all conditions and use cases in NSW.

With more than 8,000 independent workshops employing over 49,000 licensed technicians across NSW, our industry provides critical services to 5.6 million vehicles—including the 50,000 electric vehicles currently on NSW roads. These services are vital to ensuring that motorists across the state can access safe, reliable, and affordable vehicle maintenance, regardless of where they live.

After thorough consultation with our members, industry stakeholders, and training partners, the AAAA must express its strong opposition to the proposed amendments, particularly the requirement that any technician working on a battery electric vehicle (BEV) must first complete the AURSS00064 skill set. The RIS fails to recognise the severe consequences of this proposal, not only for workshops and technicians, but for EV owners and NSW's broader transition to electrified transport.

This submission outlines our core concerns, proposes an evidence-based alternative policy model, and calls for a more collaborative and informed approach to reform.

The AAAA is the peak national industry body representing the Australian supply chain for automotive products, vehicle maintenance, repair, and modification.

Our industry supports car owners after the purchase of the car, keeping vehicles safe and providing products for modification to make vehicles fit for purpose, including trade and emergency vehicles – in essence, everything that happens to the car after the initial purchase is part of the Australian automotive aftermarket sector.

Our members design and manufacture automotive components; distribute replacement and service parts in real-time; wholesale, import and export automotive parts and accessories, retail tools and equipment; and provide vehicle service, repair, and modification services in every community in Australia.



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For further information or to discuss this submission, please contact:

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

AAAA National Office
7 – 8 Bastow Place,
Mulgrave VIC 3170
Ph: 03 9545 3333

www.aaaa.com.au

EXECUTIVE SUMMARY

The AAAA opposes the proposal to mandate the AURSS00064 Battery Electric Vehicle Skill Set as a precondition for qualified technicians to undertake servicing or repair of electric vehicles (EVs) in New South Wales.

This proposal is both poorly conceived and fundamentally disconnected from how the modern automotive service sector operates in 2025. It is based on outdated assumptions, flawed logic, and a concerning lack of understanding of the realities of vehicle service and repair today.

The proposal represents an unwarranted erosion of trust in a sector that has consistently demonstrated its capacity for leadership in safety, innovation, and technical excellence. For decades, the automotive service and repair industry has adapted to new vehicle technologies, including complex hybrid and electric drivetrains without the need for rigid, prescriptive regulation. The AAAA therefore urges the NSW Government to adopt a more appropriate, fit-for-purpose regulatory approach; one that builds upon the strong foundations already established under existing Work Health and Safety (WHS) legislation and Australian Consumer Law. By holding businesses accountable for ensuring technician competency, and supporting this responsibility with practical, industry-informed guidelines, the Government can achieve safety and consumer protection objectives without undermining the viability of thousands of independent workshops across the state.

We are alarmed by the logical inconsistencies and omissions in the Regulatory Impact Statement (RIS). It ignores the widespread and safe service of high-voltage hybrid vehicles, many with similar technical risk profiles to EVs, without any mandatory additional training. The independent sector has successfully adapted to hybrid technology over the past decade with professionalism and commitment to safety. Now, without justification, the Government seeks to impose a rigid new regulatory barrier that will erode access, increase costs, and disqualify thousands of capable and experienced technicians from continuing to work on EVs.

At the heart of the proposal is an erroneous belief that a single technician completes all tasks on a vehicle. In fact, today's workshops operate more like high-functioning teams in a restaurant kitchen. The head chef does not chop the vegetables; similarly, highly skilled senior technicians do not perform every single task on a vehicle. Work is assigned according to expertise, task complexity, equipment availability, and risk profile. This is standard practice and has safely underpinned our service model for decades.

The proposal to impose an EV Skill Set mandate effectively disqualifies tens of thousands of qualified and experienced technicians from continuing to work on EVs, despite their proven capability of servicing and repairing EVs for over a decade. Many already hold high-voltage safety credentials and manufacturer-recognised training, which are not recognised under the proposed mandatory framework.



AAAA supports improved EV servicing, but not through blunt mandatory training, which in our view is doomed to fail in its implementation. After consultation with our members and training providers, we suggest two alternative pathways.

This is a critical moment for EV adoption in NSW. The Government must ensure that its regulatory settings support, not obstruct, a safe, skilled, and accessible service and repair sector.

SUMMARY OF KEY CONCERNS

1. Unprecedented Disqualification of Skilled Technicians

The proposal effectively disqualifies tens of thousands of licensed, experienced automotive technicians from servicing EVs, even though many have safely done so for years. These professionals hold existing high-voltage credentials (e.g. AURETH101) and manufacturer-accredited training, yet this experience is not recognised under the proposed mandatory framework. This is both unjustifiable and highly disruptive.

The AAAA estimates that more than 95% of currently licensed technicians would be immediately excluded from performing BEV servicing under this rule, despite their competency, training, and track record. This will disproportionately impact small, independent, and regional workshops who cannot absorb the training costs, travel time, or lost revenue during extended technician absences.

2. Severe Consumer and Economic Impacts

This proposal will significantly reduce the availability of EV service providers across NSW, creating artificial bottlenecks and driving up costs for consumers. The NSW Government has set a target of 52% of new vehicle sales to be electric by 2030, yet this proposal will severely undermine that goal by making ownership more expensive and less convenient.

In regional and rural areas, where access to authorised dealers is already limited, this proposal may leave EVs stranded without service options. The department's failure to quantify these likely outcomes is a glaring oversight.

Despite many already possessing substantial experience, manufacturer training and additional safety training in high-voltage systems with courses such as AURETH101. The proposal will cause a sharp contraction in the number of service and repair providers, pushing our most skilled and experienced technicians out of scope for EV repairs. The impact will be especially severe for independent workshops, regional businesses, and small enterprises, which lack the resources to rapidly upskill staff or absorb lost income during training absences.

Additionally, the financial impact of this sudden and restrictive proposal is not shared by the government, the cost is worn solely by the service and repair industry. The course itself which can cost up to \$3,000 per technician as well as the opportunity loss of having that technician away for at least a full week of work is a major financial burden on business. The inability of the department to present offsets to this such as government funding, transitional licensing, or recognition of prior learning pathways highlights their inadequate understanding of our industry and how this proposal's implementation would impact the industry.

3. No Consideration of Training Capacity

There is currently no indication that training providers have the resources, facilities, or geographic coverage to meet the demands of this proposal. The AURSS00064 is not widely delivered. TAFEs already report being fully booked for 12 months, with no plans to scale up. Yet the Department proposes mandatory uptake for tens of thousands of technicians, without any infrastructure in place to support the transition. This is not just poor planning—it is a regulatory failure.

4. Flawed and Incomplete Regulatory Impact Statement

The RIS accompanying the proposal is wholly inadequate. It fails to:

- Present any cost-benefit analysis grounded in data.
- Quantify how many technicians are affected.
- Provide an assessment of the current number of electric vehicles on NSW roads, along with projections for future growth.
- Consider implementation logistics, including training availability.
- Identify alternative pathways to competency.

The assertion that there are “no public costs” to this proposal is demonstrably false. There are significant public costs in the form of service access delays, higher prices, regional service deserts, and reduced consumer choice.



SUMMARY OF KEY CONCERNS

5. Lack of Implementation Planning and Transition Period

The AAAA holds serious concerns about the industry's ability to comply with the proposed licensing requirements within the timeframes implied. There is a clear gap between the current EV servicing demand in NSW and the practical capacity of the workforce to meet these requirements without adequate preparation.

The Regulatory Impact Statement (RIS) does not acknowledge these issues, nor does it propose any structured plan to phase in the new requirements. This omission raises significant questions about the level of implementation planning and the Department's understanding of how our industry operates.

Several key questions remain unanswered in the proposal:

- If the Department is confident in this model, why hasn't a set non-enforcement date not been proposed in the RIS?
- What provisions exist to support current workers during the transition?
- Has there been consultation with insurers regarding potential conflicts with state regulation compliance during a non-enforcement period?

The absence of a transition period risks creating a scenario where, from the commencement date, no technician in NSW would be legally authorised to service EVs—unless they have already completed the required training and submitted the appropriate documentation. This would be highly disruptive to both businesses and consumers.

Sound implementation planning would include:

- A reasonable lead time (e.g. five years) to allow the workforce to complete the necessary training,
- Provisional arrangements to permit supervised or conditionally authorised work during the transition period,
- And a clear communication plan to ensure all stakeholders understand their obligations and timelines.

The RIS does not currently address these practical matters. This lack of detail is concerning and suggests a limited understanding of the operational realities within the vehicle service and repair industry.

6. Lack of Justification for a New Repair Class

It is important to emphasise that the automotive repair sector is already subject to comprehensive legal obligations to ensure workplace safety. Under NSW's existing Work Health and Safety (WHS) legislation, employers are legally required to identify risks, implement control measures, and ensure that all workers are appropriately trained and competent to carry out their duties safely. These obligations are enforceable, well-established, and have proven effective in managing the risks associated with high-voltage vehicle systems, including hybrids. Given the robustness of this existing legal framework, the imposition of an additional layer of regulation, specifically targeting electric vehicles, appears both unnecessary and duplicative. Rather than improving safety outcomes, it risks creating confusion, regulatory overlap, and unintended consequences for workshop operations.

The rationale for introducing a new licensing class for BEVs is not supported by evidence. Existing laws already require businesses to ensure technicians are competent for the tasks they perform. If the Office of Fair Trading believes a new class is necessary, it must present a data-driven justification, clearly demonstrating that BEVs pose a new and unmet risk that cannot be addressed through existing law.

No such case has been made.



PROPOSED ALTERNATIVE: A Smarter Regulatory Pathway

Option A (Preferred): Business Accountability Model

The AAAA advocates for a business-level accountability framework, under which licensed repairers are required to ensure that their personnel possess the requisite training and competency to undertake electric vehicle service tasks. This approach more accurately reflects contemporary workshop practices and permits the demonstration of competency through a range of recognised pathways, including:

- Nationally accredited training (e.g. AURSS00064 or equivalents);
- OEM-recognised training (including Bosch and others);
- Documented on-the-job learning;
- Recognition of prior learning (RPL);
- Internationally recognised EV training.

Under this modern and appropriate model, the Office of Fair Trading would issue guidelines, developed in partnership with industry, to support compliance. These would include task-based competency expectations, templates for records, and examples of appropriate qualifications. Enforcement would rely on audits, and not blanket exclusion.

Option B: Modified Implementation of the Skill Set (If Mandated)

If the Government proceeds with mandating AURSS00064, AAAA strongly recommends the following safeguards:

1. **A documented 5-year non-enforcement period** to allow the sector to transition.
2. **Fee-free training access for regional and small workshops (under six technicians)** for a minimum of three years.
3. **A dedicated unit** for Recognition of Prior Learning – to include recognition of OEM training (OEM training includes Bosch). Industry training, overseas qualifications and on-the-job training.

Ongoing engagement with AAAA and other industry bodies to monitor and evaluate implementation.

CONCLUDING REMARKS

The AAAA reiterates its strong opposition to the proposed licensing changes. We are not opposed to EV training or reform, in fact, our members are actively leading innovation and investing in upskilling. However, the current proposal is unworkable, unjustified, and counterproductive. It will cause widespread harm to small businesses, restrict consumer choice, and ultimately slow down EV adoption in NSW.

The two regulatory options presented in this submission offer a far more sustainable path forward. We urge the NSW Government to pause implementation, reconsider its approach, and work collaboratively with industry to deliver smart, scalable, and evidence-based regulation.

We thank the Department for the opportunity to provide this feedback. The AAAA remains committed to supporting good policy that enables a safe, skilled, and competitive future for vehicle servicing in NSW.

AAAA appreciates the opportunity to provide this submission as part of the consultation. We trust that the open and honest feedback from our members will be taken in the constructive spirit intended. Our Association remains committed to working with the Minister for Better Regulation and Fair Trading, the Department and all stakeholders to ensure the final Motor Dealers and Repairers Regulation 2025 is effective, balanced, and evidence based.