AUSTRALIAN AUTOMOTIVE
AFTERMARKET ASSOCIATION

Australian Automotive Aftermarket Association (AAAA)

Submission to NSW Fair Trading Electric Vehicle Repair in NSW: Proposed Reform Options

Regulate the risk, not the propulsion system.

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FOR FURTHER INFORMATION

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Executive Summary

The Australian Automotive Aftermarket Association (AAAA) welcomes the opportunity to respond to NSW Fair Trading's Electric Vehicle Repair in NSW: Proposed Reform Options Discussion Paper.

AAAA strongly supports the objective of ensuring that electric, hybrid and plug-in hybrid vehicles are serviced and repaired safely and competently.

We also acknowledge that NSW Fair Trading has listened to industry concerns and reconsidered elements of its original proposal. The inclusion of alternative models, particularly the distinction in Option 2 between low-risk and high-risk work, represents an important improvement on the original proposal.

However, AAAA does not support any of the three options in their current form.

Our central concern remains that the reform process continues to begin with a predetermined regulatory mechanism - additional repair classes and prescribed qualifications - rather than beginning with the actual risks associated with particular repair tasks and determining the least burdensome and most effective way of controlling those risks.

Regulate the risk, not the propulsion system.

A battery electric vehicle is not, for regulatory purposes, one indivisible high-risk object. A technician replacing tyres, repairing suspension, changing mechanical braking components, replacing a cabin filter or performing work entirely unrelated to the high-voltage system should not automatically be subject to additional occupational licensing or qualification requirements merely because the vehicle is electrically propelled.

Equally, work directly involving high-voltage batteries, traction systems, high-voltage components and electrical isolation clearly requires appropriate competency, systems, equipment and procedures.

The regulatory framework should distinguish between these activities.

AAAA therefore recommends that NSW Fair Trading use Option 2 as a starting point and redesign it around a genuinely task-based and risk-proportionate framework.

Broadly, that framework should recognise three levels of activity:

1. Ordinary work that does not interact with the high-voltage system - undertaken within an existing Motor Vehicle Tradesperson Certificate (MVTC) scope without an additional EV qualification merely because the vehicle is an EV, HEV or PHEV.
2. Work for which the vehicle must be depowered or electrically isolated - requiring appropriate depowering and reinitialisation competency, such as AURETH101 or an accepted equivalent.
3. Work directly on high-voltage systems and components - requiring higher-level competency, such as AURSS00064 or an appropriately recognised equivalent.

These individual competencies must sit within a broader workplace safety framework. Safe EV repair depends not only on the qualification held by one individual, but on the systems of work established by the business: vehicle identification and triage, isolation procedures, appropriate tooling and PPE, controlled work areas, supervision, technical information, emergency procedures and clear authorisation of workers to undertake particular tasks.

This has consistently been AAAA's position throughout this process.

About the AAAA

The Australian Automotive Aftermarket Association is the national industry association representing businesses across the automotive aftermarket, including independent service and repair workshops, parts manufacturers and suppliers, diagnostic and technical service providers, accessory businesses and other businesses supporting Australia's vehicle fleet.

AAAA has a particularly strong interest in this reform.

Our membership includes the largest concentration of independent workshops currently servicing, repairing and preparing to service electric vehicles of any automotive industry association in Australia.

These businesses are not considering EV repair as an abstract future policy issue. They are investing now.

They are purchasing insulated tools and specialised equipment. They are developing workshop procedures. They are training staff. They are accessing manufacturer repair information. They are making decisions about workshop layout, recruitment, capital expenditure and the services their businesses will offer over the next decade.

AAAA therefore brings to this consultation direct experience from businesses that must make the proposed regulatory framework work in practice.

Our members strongly support appropriate training. The automotive aftermarket is already investing substantially in EV skills and capability.

The issue before Government is not whether training is valuable.

It is whether NSW should mandate particular qualifications for particular activities, whether those requirements are proportionate to the risks involved, and whether occupational licensing is the most effective mechanism for achieving the desired safety outcome.

Those are different questions.

The Consultation Process

AAAA acknowledges the work undertaken by NSW Fair Trading to reconsider the original proposal. The July 2026 Discussion Paper itself records that, following industry feedback, Fair Trading determined that there was a need to re-evaluate the proposed reforms and investigate additional options.

That reconsideration is welcome.

However, we believe it is important to place on record that the overall policy development process has been less than ideal.

This reform has been under consideration, in various forms, for several years. NSW Fair Trading's own summary identifies consultation concerning EV repair licensing dating back to 2020, followed by further consultation in 2022, legislative consultation in 2023, reform proposals associated with the remake of the Regulation, industry roundtables and now a further Discussion Paper containing three different implementation models.

Over that period, industry has been presented with changing proposals, changing qualification requirements, different approaches to hybrids, altered transition arrangements and differing explanations of which workers and activities would ultimately be captured.

The latest Discussion Paper now expressly acknowledges that further work and consultation is still required simply to determine what constitutes low-risk and high-risk EV repair work.

This is not a minor matter.

The distinction between low-risk and high-risk work is the foundation on which a proportionate regulatory framework should have been built in the first place.

Why process certainty matters

Automotive workshops are small and medium businesses making long-term commercial decisions in an industry undergoing substantial technological change.

They need reasonable certainty to make decisions about:

- staff recruitment and retention;
- apprentice training;
- qualifications and professional development;
- workshop equipment;
- tooling and diagnostic capability;
- workshop design and safe work areas;
- future service offerings;
- business expansion; and
- whether to invest in EV repair capability at all.

A prolonged and fragmented regulatory process makes those investment decisions harder.

A workshop deciding today whether to invest tens of thousands of dollars in EV capability reasonably wants to know what qualifications its workforce will need, what work those employees will legally be permitted to undertake, whether existing experience will be recognised and whether the regulatory requirements applying in NSW will change again before that investment is recovered.

Regulatory uncertainty therefore has a real economic cost even before a regulation commences.

AAAA encourages NSW Fair Trading to bring the policy development phase to a clear conclusion following this consultation and to provide industry with a transparent implementation pathway, clear definitions and sufficient lead time.

Industry and Commercial Interests

AAAA also wishes to raise an issue about the composition and balance of consultation on this reform.

Training organisations and training specialists have an important contribution to make to EV policy development. They possess expertise in competency standards, curriculum development and training delivery.

However, some participants in this debate also derive revenue from the delivery of training that may become mandatory as a direct consequence of the regulatory model being considered.

That commercial interest does not invalidate their expertise or their contribution.

It does, however, mean their contribution should be understood in that context.

There is an obvious difference between:

- a workshop that will be legally required to purchase training and lose productive labour while employees undertake it; and
- an organisation that may receive additional fee-for-service revenue because that training has become mandatory.

AAAA has been concerned throughout this process that the policy discussion has at times given disproportionate weight to the training and qualification solution before adequately establishing the regulatory problem that needs to be solved.

A strong consultation process should avoid allowing the availability of a particular training product to determine the boundary of occupational regulation. The correct sequence is the reverse: identify the risk; identify the task that creates that risk; determine the competency required to undertake that task safely; and only then determine whether regulation or a prescribed qualification is necessary.

We therefore recommend that NSW Fair Trading ensure that commercial interests associated with proposed mandatory training are transparent and appropriately balanced against the views of employers, technicians, independent workshops, safety specialists and organisations representing businesses that will bear the cost of the regulation.

This will strengthen confidence in the final reform.

Start with the risk, not the vehicle

This is the central policy issue.

The proposed models still treat an EV as the principal unit of regulation.

That is too blunt.

Modern vehicles contain a collection of mechanical, electrical, electronic and software systems. The risks associated with repairing a vehicle depend primarily on what task is being performed, not simply the vehicle's propulsion technology.

A tyre remains a tyre.

A suspension component remains a suspension component.

A cabin filter does not become electrically hazardous because the vehicle has a traction battery.

Our earlier advice to NSW Fair Trading made this point clearly: many jobs performed on EVs do not involve the high-voltage system at all, and work on one vehicle is frequently shared between technicians undertaking different tasks.

NSW Fair Trading now appears to accept much of this principle.

Under Option 2, Fair Trading proposes separate high-risk and low-risk pathways and identifies steering, suspension and braking as examples of work that could fall within the low-risk scope.

That is a positive development.

The next step should be to complete the logic.

There should not be a mandatory EV qualification attached to a task unless the Government can identify:

1. the particular EV-related hazard associated with that task;
2. why the worker's existing trade competency and normal WHS controls are insufficient to manage it; and
3. how the additional mandated competency specifically controls that risk.

That test should be applied consistently to every proposed category of work.

AAAA's preferred risk framework

Tier 1 - Work that does not interact with the high-voltage system

Work within an existing MVTC scope that does not require access to, disconnection of, diagnosis of, repair of or intervention in a high-voltage system should remain within that existing scope.

AAAA strongly supports a minimum level of EV safety knowledge for technicians working on or around electric, hybrid and plug-in hybrid vehicles. A common baseline of awareness is good practice and will become increasingly important as these vehicles make up a greater proportion of the fleet.

However, the prescribed competency must be appropriate to the work being undertaken.

AURETH101 is a valuable unit and AAAA strongly supports its use where a technician is required to **depower and reinitialise a battery electric vehicle.** That is what the unit is designed to teach.

It is less appropriate as a mandatory entry requirement for every tradesperson performing ordinary work on an EV where the technician will never undertake the depowering or reinitialisation task. A technician replacing a cabin filter, fitting tyres or undertaking another task entirely removed from the high-voltage system needs appropriate EV safety awareness, but does not necessarily need competency in a task they will not perform.

AAAA therefore supports a **minimum EV safety and awareness competency for Tier 1 work,** but does not believe AURETH101 should automatically be prescribed as that competency.

Importantly, this issue should also be considered within the national training system rather than NSW developing requirements in isolation.

The national automotive EV qualifications and training products are currently being reviewed to create clearer, fit-for-purpose pathways as EV technology and workforce requirements evolve. AUSMASA is currently developing a training product intended to address precisely this type of cohort: workers who require a sound understanding of EV hazards and safe working practices, but who are not required to depower, reinitialise or work directly on high-voltage systems.

NSW should engage with and support that national process before prescribing an existing unit that does not precisely match the task being regulated.

The objective should be to ensure that every worker has the **level of EV knowledge appropriate to the work they actually perform** — not to require a depowering competency simply because it is the closest existing unit currently available.

Examples are likely to include:

- tyres and wheels;
- wheel alignment;
- suspension;
- steering components unrelated to the HV system;
- conventional mechanical braking components;
- glazing;
- body and trim work where the HV system is not affected;
- cabin filters and routine non-HV service items;
- non-HV accessory work where appropriately isolated from HV components; and
- other mechanical work that does not require the worker to interact with the high-voltage system.

AAAA does not believe AURETH101 should automatically become a de facto EV licence required before a tradesperson can perform every ordinary task on an EV.

Before mandating AURETH101 for Tier 1 work, NSW Fair Trading should identify the additional risk being controlled.

General EV awareness training may be extremely valuable and should be encouraged as good workplace practice. But valuable training and mandatory occupational licensing are not the same thing.

AAAA's preferred risk framework - continued

Tier 2 - Work requiring depowering or reinitialisation

Where a task requires a vehicle to be depowered, isolated or subsequently reinitialised, the person responsible for that process should hold an appropriate competency.

AURETH101 is an obvious potential benchmark for this work.

Importantly, however, the requirement should attach to the task being undertaken, rather than automatically to every person who subsequently performs unrelated work on the electrically safe vehicle.

Tier 3 — High-voltage diagnosis, repair and battery work

Work directly involving high-voltage systems clearly sits at the highest-risk end of the framework and should require appropriately advanced competency.

However, AAAA considers that the Discussion Paper requires substantially more work in defining what is intended to sit within this category and, importantly, whether the proposed qualification is aligned to every activity NSW Fair Trading appears to contemplate.

Under Option 2, NSW Fair Trading proposes that completion of the AURSS00064 Battery Electric Vehicle Inspection and Servicing Skill Set would allow existing motor mechanics and automotive electricians to undertake what the paper describes as "high-risk repair work", including work on rechargeable energy storage systems, traction motors and safety interlocks.

AAAA urges caution with this formulation.

There is a significant difference between:

- safely isolating and servicing a high-voltage vehicle;
- diagnosing faults in high-voltage systems;
- removing and replacing high-voltage components;
- removing or replacing a complete battery assembly; and
- opening, dismantling, diagnosing or repairing the internal components of a high-voltage battery or rechargeable energy storage system.

These activities should not automatically be treated as one homogenous category of "high-risk EV repair".

Battery repair requires particular attention

AAAA is especially concerned that the language used in the Discussion Paper could be interpreted as authorising a worker who has completed AURSS00064 to undertake repair work directly within a high-voltage battery or rechargeable energy storage system.

That requires much greater examination.

Battery internal repair is not currently routine work in the overwhelming majority of general automotive workshops. It is highly specialised work involving different risks, technologies and competencies from ordinary EV inspection and servicing.

The industry is itself still determining how this work should appropriately be categorised and what competencies should attach to it.

For that reason, NSW should be extremely cautious about creating a regulatory scope that appears to place inspection and servicing, high-voltage diagnosis and internal battery repair under a single qualification pathway.

The title and current purpose of AURSS00064 itself should prompt further analysis. It is the **Battery Electric Vehicle Inspection and Servicing Skill Set.** NSW Fair Trading should not assume that because this is the closest existing nationally recognised Skill Set, it necessarily represents the appropriate competency for every activity that might fall within a broadly described "high-risk" category.

The qualification should follow the work. The work should not be stretched or compressed to fit the qualification that happens to be available.

Greater skills mapping is required

This highlights a broader weakness in the current Discussion Paper.

The proposed framework moves too quickly from identifying broad categories of work to nominating existing qualifications.

There is insufficient intermediate analysis showing precisely:

- what tasks technicians are expected to perform;
- the hazards associated with each task;
- the level of exposure to high-voltage components;
- whether the vehicle is energised or electrically isolated during the task;
- whether a battery assembly is being inspected, removed, replaced, opened or internally repaired;
- the competencies required to perform each task safely; and
- which national training product, if any, properly maps to those competencies.

In AAAA's view, this detailed **skills mapping and risk mapping should occur before NSW prescribes qualifications or finalises repair-class scopes.**

Indeed, there is a strong case for this work to form a distinct technical stage of the reform process.

The current paper attempts to do too much at once: define the regulatory framework, choose the licence structure, allocate repair scopes and prescribe qualifications before the underlying task-to-skill map has been sufficiently settled.

That order should be reversed.

AAAA's preferred risk framework - continued

This work is already occurring nationally

NSW also does not need to undertake this exercise in isolation.

AUSMASA is currently reviewing national automotive EV training products and the competency pathways required as EV technology develops.

That work includes consideration of battery technology and the competencies required for different levels of battery-related work.

AUSMASA is also undertaking a national dialogue in early September on EV skills mapping and risk assessment.

This is directly relevant to the questions NSW Fair Trading is now attempting to resolve.

AAAA strongly recommends that NSW Fair Trading engage with and have regard to that national work before establishing a NSW-specific regulatory boundary between servicing, high-voltage repair and battery repair.

The national training system should be allowed to do the work it is designed to do: identify emerging skills, map competencies against tasks and develop or revise nationally recognised training products where gaps exist.

It would be counterproductive for NSW to prescribe a particular qualification now, only for the national system shortly afterwards to determine that a different or higher-level competency is required for some of the work captured by that NSW regulation.

AURSS00064 should not automatically be treated as the ceiling

AAAA considers that AURSS00064 may be an entirely appropriate competency for particular categories of high-voltage inspection and servicing work.

However, NSW Fair Trading should not treat it as an automatic gateway to every form of high-voltage repair.

Nor should the Skill Set become, by default, the highest qualification required merely because it is the existing training product that most closely resembles the proposed work.

The framework currently risks over-regulating one end and under-regulating the other

This illustrates the central problem with trying to design regulation around existing qualification titles rather than first mapping the actual risk.

At one end of the spectrum, the Discussion Paper risks requiring a worker undertaking a routine, non-high-voltage task to complete training that is broader than the work they will perform.

At the other end, it appears possible that a three-day inspection and servicing Skill Set could be treated as sufficient authority for substantially more complex battery-related work.

Neither outcome is desirable.

A genuinely risk-based system should avoid both **over-qualification of routine work and under-qualification of genuinely specialist work.**

That is why AAAA recommends that NSW Fair Trading undertake, or participate in, a detailed national skills-mapping exercise before finalising the high-risk scope.

AAAA's recommended approach to Tier 3

AAAA recommends that NSW Fair Trading:

1. retain the principle that direct work on high-voltage systems requires higher-level competency;
2. separate high-voltage work into more precise task categories rather than treating all such work as a single tier;
3. distinguish between inspection and servicing, diagnosis, component replacement, complete battery removal/ replacement and internal battery repair;
4. undertake detailed risk and competency mapping for each category;
5. avoid assuming that AURSS00064 is sufficient for every form of high-voltage or battery-related work;
6. recognise that some battery-related work may require a higher or additional competency;
7. engage directly with AUSMASA's current national EV qualification review and skills-mapping work before prescribing final NSW requirements; and
8. ensure that NSW regulation remains capable of recognising new or revised national training products as they are developed.

The purpose of this reform should be to make sure the **right person has the right competency for the particular work being undertaken.**

That requires more precision than the current Discussion Paper provides.

The missing layer: the workshop

All three options remain too focused on the qualification attached to the individual worker.

Qualifications matter.

But qualifications alone do not create a safe workplace.

This was the central reason AAAA previously proposed an EV-Ready Premises model.

Safe EV repair depends on the business having:

- an appropriate risk assessment;
- safe systems of work;
- vehicle identification and triage procedures;
- clear depowering and reinitialisation procedures;
- controlled EV work areas where required;
- barriers and signage;
- appropriate PPE;
- appropriately rated insulated tools and test equipment;
- procedures for damaged or suspect batteries;
- emergency procedures;
- access to current technical information;
- appropriate supervision; and
- a system determining which employees are authorised to perform particular categories of work.

Our January proposal placed these workplace controls at the centre of EV safety, rather than relying exclusively on an individual's qualification.

That remains our position.

This is also more closely aligned with the fundamental structure of workplace health and safety regulation, under which the business has responsibility for providing safe systems, training, equipment and workplaces.

An individual certificate is one control within that system. It should not be mistaken for the system itself.

Hybrids expose the weakness in a vehicle-based model

AAAA welcomes the progress made during the August roundtable concerning hybrids.

The NSW Fair Trading summary records broad agreement and support for risk-based regulation and recognition that battery work and high-voltage components represent increased risk.

This is important.

Independent workshops have serviced hybrid vehicles containing high-voltage systems for more than two decades.

Our earlier advice noted the fundamental difficulty this creates for a regulatory model based simply on whether a vehicle is categorised as a BEV.

If the relevant safety concern is high voltage, regulation should follow high-voltage risk wherever it exists.

If a conventional hybrid and a battery electric vehicle expose a worker to materially equivalent hazards when undertaking a particular task, equivalent safety requirements should apply.

Conversely, if a task performed on either vehicle does not interact with that hazard, a high-voltage qualification should not be required merely because high-voltage components exist elsewhere on the vehicle.

This is another reason that task-based regulation is more coherent than propulsion-based licensing.

Conventional hybrids

NSW Fair Trading specifically asks whether existing motor mechanics should be able to continue undertaking work on conventional hybrids without additional restrictions.

AAAA strongly supports this approach for work within their existing scope.

The industry has extensive practical experience servicing and repairing hybrids.

Introducing a new prohibition on work that qualified tradespeople have safely and competently performed for many years would require a particularly strong evidence base.

We have not seen evidence demonstrating a safety problem of sufficient scale to justify such a restriction.

Where work involves the high-voltage system, appropriate competency should of course apply.

But the existence of a high-voltage system somewhere within a hybrid should not convert every task performed on that vehicle into high-voltage work.

The 1,500 legacy MVTC holders demonstrate the problem

Perhaps the clearest evidence that the current proposal is being driven by qualification architecture rather than competency is the treatment of alternate-pathway MVTC holders.

NSW Fair Trading estimates that approximately 1,500 existing MVTC holders obtained their qualification through pathways recognised under the previous legislative framework but do not hold the modern Certificate III prerequisite required to enter AURSS00064.

Fair Trading candidly identifies the contradiction: these workers are currently regarded by NSW as competent to undertake the same existing work as Certificate III-qualified tradespeople, but may be prevented from accessing the EV Skill Set because of the structure of its prerequisite requirements.

This is a regulatory warning sign.

The fact that an experienced tradesperson cannot enter a particular training product does not establish that the person is incapable of safely acquiring the competency required to undertake EV work.

NSW should not strand 1,500 existing tradespeople because the chosen training architecture does not accommodate the qualification pathway under which NSW itself originally certified them.

A practical bridging or competency assessment pathway must be developed before any new restriction takes effect.

OEM training and existing competence

A similar problem arises with OEM-trained workers.

NSW Fair Trading acknowledges that OEMs have trained technicians to undertake brand-specific EV repair and that some businesses consider requiring those employees to subsequently certify the same competence through the formal qualification framework to create unnecessary cost and duplication.

Fair Trading also identifies legitimate concerns about relying indiscriminately on OEM training, including differences between programs and the Department's inability to independently validate every manufacturer course.

AAAA accepts those concerns.

The answer, however, should not be to pretend existing competency does not exist.

Nor should NSW create a system under which the only realistic route to recognition is an expensive and administratively burdensome RPL process that may require the worker to demonstrate competencies well outside the work actually being undertaken.

A credible framework should allow competency to be demonstrated through nationally recognised training, structured RPL, appropriately benchmarked OEM training or other recognised equivalent pathways.

The objective should be competence, not duplication.

Training costs are broader than course fees

The Discussion Paper provides useful cost information.

It identifies indicative TAFE NSW costs of:

Qualification	Indicative duration	Indicative cost
AUR32721 Certificate III in Automotive Electric Vehicle Technology	Approx. 3 years	$0 - $17,180
AURSS00064 Battery and Electric Vehicle Inspection and Servicing Skill Set	3 days	$1,450
AURETH101 Depower and Reinitialise Battery Electric Vehicles	1 day	$650

Fair Trading also acknowledges that businesses incur the additional burden of employees taking time away from work and administrative costs associated with managing qualification requirements.

AAAA considers these indirect costs particularly important.

For a small workshop, the real cost of three days' training is not simply $1,450.

It can include:

- three days of lost productive labour;
- jobs that cannot be booked;
- rescheduling customers;
- overtime or additional labour required to compensate;
- travel and accommodation where regional training is unavailable locally;
- employer administration; and
- the opportunity cost of training an employee in a competency that may be used relatively infrequently.

These costs multiply rapidly if a regulatory model unnecessarily captures numerous technicians performing low-risk work.

Government assistance with course fees is welcome, particularly in regional areas, but a subsidy does not transform an unnecessary regulatory requirement into a necessary one.

The first question must always remain whether mandatory training is justified for the task.

Consumer confidence should follow actual safety

AAAA also urges caution in relying on consumer confidence as an independent justification for additional licensing.

The Discussion Paper suggests in several places that consumers may have greater confidence if they know the person repairing their EV has completed a prescribed qualification.

That may be true.

But regulation should not be created simply because a new licence might make consumers feel safer.

The relevant question is whether it makes them safer.

A qualification requirement that is not proportionate to the task may create a perception of safety without materially improving safety outcomes.

It may also produce consumer detriment if it reduces the number of workshops willing or able to service EVs, limits competition, increases repair costs or requires consumers to travel greater distances for routine repairs.

Consumer confidence is best supported by a competent, competitive and accessible repair sector operating under effective safety systems.

Assessment of the three options

Option 1 - AAAA does not support

Option 1 remains substantially the original model.

It creates new EV repair classes, requires existing mechanics and automotive electricians to complete AURSS00064 to bridge into EV repair and imposes AURETH101 requirements across other repair categories.

AAAA considers this approach too blunt and insufficiently connected to the actual risks of individual repair activities.

It would impose significant new qualification requirements even where much of the work undertaken does not involve the high-voltage system.

We do not support Option 1.

Option 2 - best foundation, but substantial redesign required

Option 2 is materially better.

It recognises that EV work has different risk levels and proposes separate pathways for low-risk and high-risk work.

This is much closer to an appropriate regulatory approach.

However, it retains two important problems.

First, it continues to require AURETH101 before a mechanic can undertake any work on an EV, even where the task itself has no meaningful interaction with the high-voltage system.

Second, the critical distinction between low- and high-risk work remains undefined.

AAAA therefore supports using Option 2 as the basis for further design, but does not support Option 2 as currently drafted.

Option 3 - less burdensome, but conceptually weaker

Option 3 reduces the burden for some existing repair classes.

However, it largely avoids rather than resolves the fundamental problem of defining the risk associated with particular tasks.

It also retains the Skill Set as the central gateway for motor mechanics and automotive electricians seeking equivalent EV repair classes.

AAAA therefore does not consider Option 3 preferable to a properly redesigned Option 2.

Transition arrangements

Whatever model is ultimately adopted, implementation must provide sufficient time for businesses and workers to adjust.

Transition arrangements should not commence until:

- low-risk and high-risk activities have been clearly defined;
- recognition pathways for legacy MVTC holders have been established;
- arrangements for appropriately recognising prior and OEM training are operational;
- guidance is published;
- businesses understand their workplace obligations; and
- NSW Fair Trading has conducted a substantial education period.

A nominal two- or three-year transition period is of little value if the industry does not know precisely what it is transitioning towards.

Clarity must precede the transition clock.

Conclusion

AAAA supports safe EV repair.

We support training.

We support technicians acquiring new competencies as vehicle technology changes.

What we do not support is equating those objectives with an ever-expanding occupational licensing framework without first demonstrating that the additional regulation is necessary, targeted and proportionate.

NSW Fair Trading has moved significantly from its original proposal. The development of Option 2 demonstrates an important recognition that not all work performed on an electric vehicle carries the same risk.

AAAA encourages the Government to follow that logic through to its conclusion.

Separate ordinary repair work from work requiring electrical isolation. Separate isolation from direct high-voltage diagnosis and repair. Require competency that corresponds to those risks. And ensure those competencies operate within workplaces that have the systems, equipment and procedures necessary to keep people safe.

The result would be a framework that is easier to understand, easier to enforce, less costly to industry and, most importantly, better aligned with the way safety is actually achieved in an automotive workshop.

Regulate the risk, not the propulsion system.

AAAA would welcome the opportunity to continue working with NSW Fair Trading to develop the detailed task and risk definitions required to implement this approach.

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