



**FEDERAL
CHAMBER OF
AUTOMOTIVE
INDUSTRIES**

FCAI submission in response to:

Electric Vehicle Repair in NSW: Proposed Reform Options

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FEDERAL CHAMBER OF AUTOMOTIVE INDUSTRIES
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1. EXECUTIVE SUMMARY

The Federal Chamber of Automotive Industries (FCAI) welcomes the opportunity to respond to the proposed reform options relating to Electric Vehicle repairs under New South Wales Motor Dealers and Repairers Regulation 2025.

The FCAI is the peak Australian industry organisation representing over 60 global automotive brands that design, manufacture, import, distribute and sell light duty passenger vehicles, light commercial vehicles, and motorcycles in Australia. FCAI members supply new vehicles to the Australian market across more than 380 models supported by over 3,300 dealers. As of July 2026, more than 120 of these models are battery electric vehicles. Our members are listed [on our website](#).

Our members lead the introduction of new vehicle technologies and champion the development of necessary industry capabilities for their repair and maintenance. They provide essential training, technical information, repair methods, genuine spare parts and tools to the market, prioritising their authorised network of service providers while also supporting the independent repair industry through the provision of spare parts and through the Motor Vehicle Information Scheme (MVIS) legislation. Worker safety and repair quality are paramount to our members, who impose strict qualification requirements on technicians within their authorised networks, often relying on a blend of VET qualifications and brand-specific training.

In line with our previous submissions, we appreciate NSW Fair Trading's continuous focus on finding flexibility in the system to accommodate the various stakeholders across the automotive repair ecosystem. It is vital to strike the correct balance between practical workshop realities and necessary administrative oversight to ensure safe outcomes for workers and consumers alike.

In the absence of a cohesive self-regulatory structure across the independent aftermarket, the FCAI supports the introduction of a dedicated EV repair class in consideration of the inherent high-voltage safety risks associated with electric vehicle repair. As modern vehicles incorporate increasingly complex and diverse technologies, the FCAI views robust baseline qualifications not as a regulatory burden, but as an essential pillar for the long-term sustainability of the entire automotive repair industry.

2. KEY RECOMMENDATIONS

The FCAI supports Option 1 as it provides the clearest framework to shield independent workshops from the catastrophic liability of high-voltage workplace incidents, prevents the erosion of safety and quality standards in the aftermarket, and delivers absolute clarity for consumer confidence.

Summary of FCAI's key recommendations:

- Implement Option 1 as the most effective mechanism to ensure industry safety and consumer confidence.
- Extend the definition of the EV repair class to include Plug-in Hybrid Electric Vehicles (PHEVs), given their identical high-voltage safety risks. To make the inclusion of PHEVs workable, the regulation must explicitly recognise either AURETH101 or AURETH011 as valid, interchangeable prerequisite evidence for safely depowering a high-voltage vehicle.
- Maintain the current operational status for conventional Hybrid Electric Vehicles (HEVs), acknowledging the industry's organic adaptation during the past two decades.
- The regulation must allow either the AURSS00064 or AURSS00063 skill set for access to the EV repair class, acknowledging the high level of expertise demonstrated by technicians holding the latter.
- Consider implementing reduced application and renewal fees for the Motor Vehicle Tradesperson Certificate (MVTC) and Motor Vehicle Repairer Licence during the transition period.
- Consider broadening the financial support available through the NSW EV strategy beyond regional NSW to support the workforce upskilling also required in urban centres.

3. RESPONSES TO DISCUSSION PAPER QUESTIONS

3.1 Is the proposed scope of work for the EV Motor Mechanic and EV Automotive Electrician clear, appropriate, and workable in practice?

Option 1 provides the clearest and most unambiguous framework to ensure long-term sustainability for both franchised networks and independent workshops. By establishing a firm baseline, Option 1 actively protects small businesses from the devastating financial and legal consequences of a high-voltage workplace incident and ensures that no technician is placed in a position of unacceptable risk merely due to competitive pressures.

Furthermore, an uncompromising standard prevents a 'race to the bottom' in the aftermarket. If all mechanics must meet the same rigorous criteria to work on electric vehicles, professional independent workshops will not be undercut by unqualified operators offering cheaper, fundamentally unsafe repairs. Option 1 avoids the dangerous ambiguity of 'low risk' versus 'high risk' certifications. When a workshop is certified under this model, consumers know the safety standard is absolute, reinforcing confidence across the entire automotive sector.

However, for the scope of work to be truly appropriate and workable, the regulation must extend the definition of the new repair class to explicitly include PHEVs. PHEVs operate with significant high-voltage battery systems and electric drivetrains that pose the exact same risks (electric shock, arc flash, and thermal runaway) as a Battery Electric Vehicle (BEV).

3.2 Are there any unintended consequences of the proposed approach that NSW Fair Trading should consider?

The FCAI recommends allowing either the AURSS00064 OR AURSS00063 qualification for access to the EV repair class. Technicians holding AURSS00063 have demonstrated a high level of expertise in diagnosing and repairing complex systems. It is highly illogical to force a master technician who is qualified to repair complex traction motors (via 63) to go back and complete a lower-level servicing course (64) just to satisfy an administrative checklist.

A three-year transition period is ample time. As per previous submissions and given the significant acceleration in BEV and PHEV uptake observed recently, the FCAI strongly supports a condensed two-year transition period to ensure a safe and robust repair industry is established with urgency. However, achieving compliance within this accelerated timeframe must be contingent upon the NSW Government providing broader financial support across both regional and urban centres.

3.3 Do you support the introduction of Option 2? Why/ why not?

The FCAI does not support the introduction of Option 2.

Option 2 creates a fragmented landscape where an independent repairer could legally advertise as being certified to work on electric vehicles, despite only holding the low-risk bridging qualification (AURETH101). Consumers will not differentiate between a 'low-risk' EV mechanic and a fully qualified EV Motor Mechanic.

If a mechanic holding only the low-risk certification misdiagnoses a complex issue or inadvertently causes damage, the consumer is highly likely to blame the vehicle's reliability, directly threatening the brand reputation of the OEM. The discussion paper itself acknowledges this risk, noting that technicians unintentionally exceeding their scope of work could result in consumer detriment.

Furthermore, under Option 2, NSW Fair Trading would be responsible for policing which mechanic performed which specific task within a single workshop. If an electric vehicle suffers a failure post-repair, investigators will have to determine whether the repair activities constituted a low or high-risk action. The discussion paper notes that a different approach to monitoring compliance would be needed, acknowledging the potential for much greater harm. Option 1 is far cleaner to administer and enforce.

3.4 What work on EVs should be considered low and high-risk? Is EV servicing considered low-risk?

The practical difficulty of safely differentiating between low-risk and high-risk work on an electric vehicle is a compelling reason to oppose Option 2. Modern automotive architectures do not easily lend themselves to arbitrary regulatory boundaries; electric vehicles are deeply integrated systems.

A theoretically 'low-risk' task, such as replacing a steering rack or suspension component, often requires navigating closely around high-voltage conduits or the traction battery enclosure. Expecting an independent technician to constantly evaluate where their state-mandated 'low-risk' scope ends and the 'high-risk' zone begins introduces a dangerous margin for error.

From the viewpoint of OEM training recognition, Option 2 would complicate matters by forcing manufacturers to map their holistic, vehicle-specific training programmes against two arbitrary state tiers. OEM training is rarely – if ever – categorised neatly into 'low-risk mechanical' and 'high-risk electrical' buckets; it is designed to ensure comprehensive competence across the entire vehicle. Adding a tiered system simply multiplies administrative friction without adding tangible safety benefits.

3.5 As motor mechanics have been repairing conventional hybrids for over 20 years, should their scope of work be unrestricted on hybrid vehicles? (not including plug-in hybrid vehicles)

Yes, the FCAI supports maintaining the current operational status for conventional Hybrid Electric Vehicles (HEVs). The industry has already safely absorbed conventional hybrid technology without mandating specialised, sweeping regulatory reform. Attempting to retroactively ring-fence hybrid ICE repair from hybrid electrical

repair would ignore two decades of established workshop practice. However, it is critical not to extrapolate this organic adaptation to the much higher risks associated with BEVs and PHEVs, which necessitate the dedicated EV repair class.

3.6 Are there any risks in changing the scope of work for motor mechanics to permit low-risk EV repair work upon completion of AURETH101?

As highlighted in our response to Questions 4 and 5 (section 3.4), permitting 'low-risk' work creates a dangerous margin for error on deeply integrated vehicles.

Furthermore, if PHEVs are rightly included in the EV repair class, the regulation must explicitly recognise either AURETH101 or AURETH011 as valid, interchangeable prerequisite evidence for safely depowering a high-voltage vehicle. Failing to do so would force mechanics to hold a BEV-specific depowering unit to conduct 'low-risk' work on a PHEV, which is illogical and administratively burdensome.

3.7 Do you support the introduction of Option 3? Why/ why not?

The FCAI strongly opposes Option 3. It makes little sense to strictly silo a highly trained motor mechanic from touching a BEV without formal upskilling, while simultaneously allowing a collision repairer or other tradesperson to perform structural work around a compromised high-voltage battery pack with no mandatory safety training.

3.8 What are the implications, if any, for industry and consumers if MVTC holders, other than motor mechanics and automotive electricians, are not required to undertake any upskilling qualifications to work on EVs within their existing scope of work?

The implications are severe safety risks for secondary tradespeople and significant reputational risks for OEMs. The risks of thermal runaway and electric shock remain constant regardless of a tradesperson's primary classification. Permitting these trades to operate without a baseline high-voltage safety qualification fundamentally undermines the entire premise of the reform.

4. OEM TRAINING RECOGNITION

OEMs whose training framework has been designed independently from the VET skillsets have the ability, should they wish, to collaborate with Registered Training Organisations (RTOs) to analyse their brand-specific training against the required VET skillsets and design targeted gap training for their dealer technician cohorts.

Over the course of the proposed transition period, some OEMs may decide to engage in such a process to support the technicians who have gone through their brand-specific training in their Recognition of Prior Learning (RPL).

In practice, it is likely that directly undertaking the prescribed VET qualifications, specifically AURETH101 or AURSS00064, will end up being the easiest and most efficient path for existing technicians to achieve compliance, rather than navigating the RPL process, even with OEM support.

While we acknowledge the initial administrative friction this transition presents for OEM-trained technicians, the FCAI views this as a necessary investment to secure a safe, and sustainable standard that drives consistency throughout the entire repair industry.

5. TRANSITION SUPPORT AND FINANCIAL RELIEF

We recommend implementing:

- **Equal access to TAFE / VET funding for both franchised dealership technicians and independent repairers.**
- **Reduced application and renewal fees for the Motor Vehicle Tradesperson Certificate (MVTC) in the EV repair class during the transition period.**
- **Reduced Motor Vehicle Repairer Licence fees for workshops undertaking upskilling.**
- **Broader financial support available through the NSW EV strategy beyond regional NSW to support the workforce upskilling also required in urban centres.**

6. BEYOND THIS CONSULTATION

The FCAI encourages other states and territories to establish common licensing regimes for the automotive repair industry. We urge NSW Fair Trading to lead cross-jurisdictional discussions to ensure that these regimes converge and align over time to support consistent practice across the country.

FCAI is available to support these efforts across all states and territories.



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