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8 October 2024

Patricia Blake  
Commissioner for Consumer Protection  
Department of Energy, Mines, Industry Regulation & Safety

Dear Commissioner,

**Consultation on proposed electric vehicle class of repair**

Thank you for the opportunity to provide the department with feedback on the proposed electric vehicle class of repair. A lot has changed since the Motor Trade Association of WA (MTA WA) provided input on the *Motor Vehicle Dealers Act 1973 (WA)* (MVDA) & *Motor Vehicle Repairers Act 2003 (WA)* (MVRA) review that led to the 2019 Decision Regulatory Impact Statement and we appreciate the stakeholder engagement on important and emerging issues such as Electric Vehicles (EV) safety for technicians and consumers.

MTA WA is well-placed to respond to this paper as the largest private training provider of light vehicle technicians in WA, including providing Cert III and post-trade upskilling programs in battery/hybrid technology and we are at the forefront of the emerging issue of up-skilling our industry to work on hybrid and electric vehicles safely. The MTA WA has been instrumental in the provision of 'training the trainer' for TAFE government training institutions to offer an EV qualification and in working with DFES staff.

Acknowledging that EV sales have increased over the years and government procurement policies are shifting towards environmentally friendly choices it is timely to address the issue of who can work on these vehicles safely and what qualifications they should hold. That said, with the majority of cars on Australian roads being propelled by an Internal Combustion Engine (ICE) the focus must be to up-skill our industry rather than focusing on a stand-alone electric vehicle qualification that will limit a technician's ability to work on an ICE vehicle. Dual qualification pathways are not always a viable option for businesses and individuals, and a selection of suitable skill sets should be the preferred option to allow Cert III qualified persons to work on BEV & HEV safely.

In summary, the automotive industry is experiencing a notable change and is already displaying an ability to adapt to these emerging technologies as it has done historically, Automotive Electrical and Mechanical Technicians are not suitably qualified to work on electric vehicles until they have completed the necessary training to diagnose and repair hybrid and electric vehicles. Please find a detailed response to the Issues Paper questions in the following documentation.

Yours sincerely,

Stephen Moir  
Group CEO Motor Trade Association of WA

## Feedback on the Issues Paper

### Certification of repairers for work on electric vehicles under the

### ***Motor Vehicle Repairers Act 2003 (WA)***

#### Section question responses and general comments

## 2. Scope of Repair Work

In reading the paper's background on the scope of repair work, a paragraph on proactive compliance may need to be addressed as a matter of urgency due to the risk of liability if someone is injured or killed whilst working on Electric Vehicles (EV) with an ELW class of repair, following advice given by the department.

*Consumer Protection recognises that there are dangers and safety issues associated with working on EVs due to their high voltage and high amperage. Currently, Consumer Protection staff conducting proactive visits to repairers make sure that anyone working on EVs that have a high voltage component must have the ELW class of repair work on their repairers' certificate or be supervised by someone with the ELW class of repair work.*

Technicians who hold an ELW class of repair work are NOT suitably trained or qualified to work on hybrid or electric vehicles.

MTA WA offers technicians an opportunity to upskill their qualifications to enable them to work on Battery (BEV) and Hybrid Electric Vehicles (HEV), it is important to recognise that the majority of technicians upskilling are Automotive Mechanical Technicians and not Automotive Electrical. Our industry is heavily weighted towards automotive mechanics who will be working on BEV & HEV vehicles in dealerships and independent workshops.

#### Questions

#### ***1. What work should be captured (i.e. defined) in a new repair class for EV work?***

EV Work should reflect the Units of Competency (UOC) within the cert III qualification AUR32721 Automotive Electric Vehicle Technology. Work captured for the EV class of repair work should have similarities to an LVW or HVW class of repair work. Licensed BEVs have steering, suspension, driveline and braking systems that will require service and repairs and will need to be included in the class. That said, this qualification alone does not allow the technician to repair an Internal Combustion Engine (ICE) and associated subassemblies.

Example of inclusions:

Any work required to do any of the following in respect of an Electric vehicle:  
to service, repair, overhaul or modify any of the following -

- the driveline;
- any electronic drive management system;
- the braking system;
- the steering system;
- the suspension system;
- the high voltage storage system;
- the high voltage drive motor;
- cooling systems for the high-voltage storage system

- to service, repair or replace a wheel assembly;
- to balance a wheel or align the wheels;
- to service or repair any hydraulic system;
- to carry out minor low-voltage electrical servicing or minor low-voltage electrical repair;
- to install or remove a prescribed accessory.

**2. Are multiple classes required, for example to distinguish between:**

Yes.

***(a) repairing EVs, including in conjunction with inspecting or diagnosing faults?***

Holding qualification AUR32721 Automotive Electric Vehicle Technology or a Cert III qualified person who has completed AURSS00064 Battery Electric Vehicle Inspection and Services Skill Set and AURSS00037 Hybrid Electric Vehicle Inspection and Servicing skill sets would be suitably qualified to work on BEV & HEV.

***(b) Battery EVs, plug-in hybrids, and hybrid EVs?***

Plug-in and HEV are fitted with an ICE and repairers will need to have the relevant class of repair to work on these vehicles such as LVW & HVW.

**3. Should electric motorcycles be included in the scope of EV work?**

Yes, motorcycle technicians should be included and would need to complete the units of competency. The Motorcycle Cert III qualification is not included as a pathway to complete the skill sets under the framework on training.gov.au, therefore motorcycle technicians will need to complete the UOC. This will need to be explored further to assess UOC that could be recognised by the department to allow a class of repair to be added for BEV motorcycle work.

### **3. Qualification to undertake EV repairs**

#### **Questions**

**1. Are there any unintended consequences in prescribing the EV Certificate III as the relevant qualification for the new EV repair class?**

Yes, limiting work on BEV to Cert III AUR32721 qualification would not allow the upskilling of the industry through the completion of skill sets. Completing a second apprenticeship is not always an option for businesses and individuals.

**2. If you are a Registered Training Organisation (RTO), are you offering or have you considered offering, the EV Apprenticeships, and when do you anticipate teaching to commence?**

Yes, we are an RTO that has added the AUR32721 qualification to our scope and have interest from Tesla WA to possibly commence training in this qualification for apprentices commencing in 2025.

**3. Should repairers who hold the EV Certificate III and apply for the EV repair class be entitled to carry out work associated with other repair classes?**

Yes, but limited to their qualification as mentioned in the first question. This would not include classes of repair related to ICE and subsystems such as.

- the fuel system;

- the air induction system;
- the engine;
- the ignition system;
- the engine management system;
- to fabricate, service, repair or modify the exhaust system

**4. If yes, which associated repair classes are appropriate for a repairer who has the EV Certificate III?**

The qualification has 16 core units related to electric vehicle inspection diagnosis and repair, 42 elective units to choose from, and only 13 elective units can be incorporated into this qualification. An assessment of the course the RTO delivers may need to take place to add appropriate classes of repair to the EV Work class of repair.

Future changes in the industry

**5. What is the current or anticipated demand for EV apprenticeships, including dual trade apprenticeships? For example, a dual trade apprenticeship in light vehicle work (LVW) and the new EV repair class to ensure the applicant is qualified for all LVW regardless of whether the vehicle is an ICE vehicle or EV?**

The MTA WA has promoted and offered the EV apprenticeship and the dual trade apprenticeship pathway for over 8 months. MTA WA has not received a request for this qualification or the dual qualification apprenticeship pathway. MTA WA expects the take-up of an EV apprenticeship to be low due to the demand for working on BEV. The majority of BEVs registered in WA are under new car warranty and therefore dealerships are handling the bulk of the current demand. As warranties expire, it is anticipated that demand for EV apprenticeships will increase, and the MTA WA is already established to provide this training.

**6. Does industry foresee a situation where there will be demand for LVW and EV repairs to be a single merged class of repair work with a prescribed qualification that combines ICE and EV repairs?**

There are approximately 2 million ICE vehicles registered in WA and with the sales of EVs slowing, the industry focus has not shifted to BEV & HEV. As mentioned previously in this submission, franchised motor vehicle dealers are completing most of the service and repair work on BEVs at this stage.

Transition period

**7. What is an appropriate transition period to allow repairers and new apprentices to complete the qualification requirements to apply for the EV repair class?**

Given the demand for MTA WA Training (skill sets) and acknowledging that TAFEs are starting to offer EV qualifications, the industry would need a minimum of 24 months to have completed courses to upskill their qualifications. Given the associated risk of working on electric vehicles, only franchise dealer technicians who have received product-specific training and technicians who have upskilled should be able to work on BEV & HEV. New apprentices would not be included as they would be in training and under the supervision of someone who holds the UOC to work on BEV & HEV.

## **4. Upskilling existing repairers to meet increasing demand for EV servicing and repairs**

### **Questions**

***1. Which classes of repair work require upskilling to undertake EV work (because the work associated with the repair class is impacted by differences between EVs and ICE vehicles)?***

EV Work means inspecting, servicing, diagnosing and repairing.  
LVW, HVW, ELW and MCW

***a. Is the level of upskilling required the same for all classes of repair which require upskilling to undertake EV work?***

Yes, the same UOC, skill sets are required for EV work. For EV interaction, AURETH101 and AURETH011 would be suitable for EV awareness and safety.

***b. Is there an existing qualification or combination of units that could be packaged together to provide suitable training?***

AURSS00064 Battery Electric Vehicle Inspection and Services Skill Set and AURSS00037 Hybrid Electric Vehicle Inspection and Servicing Skill Set would suitably qualify Cert III qualified technicians to work on BEV.

***c. What barriers, if any, exist in upskilling repairers to work on EVs in Western Australia?***

Barriers in WA & Australia are the restrictions applied to skill set training and government funding. The skill set is limited to those who have completed one of the following qualifications,

- AUR30320 Certificate III in Automotive Electrical Technology or equivalent
- AUR30620 Certificate III in Light Vehicle Mechanical Technology or equivalent
- AUR31120 Certificate III in Heavy Commercial Vehicle Mechanical Technology or equivalent
- AUR31220 Certificate III in Mobile Plant Technology, or equivalent. (Graduates of the EWP stream must have completed AURETR129 Diagnose and repair charging systems and AURETR130 Diagnose and repair starting systems)

Skill sets are government-funded and individual UOCs are not, RTOs can deliver UOC to motorcycle mechanics and panel beaters etc, but they are not eligible for the skill sets as they are not a recognised pathway for those skill sets. Application for an EV class of repair may need to consider UOC within a skill set as a pre-requisite rather than the certificate stating they have completed a skill set for classes of repair such as MCW.

***2. Are there any unintended negative consequences from allowing repairers to upskill by completing bridging courses or gap units?***

MTA WA cannot foresee any negative consequences for bridging courses, providing the students obtain nationally accredited UOC.

### **3. Should EV training provided by a factory/manufacture of EVs be recognised?**

Manufacturer training is an asset for model-specific training and in the absence of regulation and available training is a suitable stopgap during the transition period. That said, if the training provider is not an RTO and cannot provide the student with nationally accredited UOC, then it should not be accepted for an application for a class of repair.

#### ***a. If factory provided EV training is recognised, should a repairer be restricted to work only on the EV brand they received training for, or should the training be recognised for work on other EV brands?***

Manufacturers providing training should be an RTO to satisfy nationally accredited training frameworks and be subject to audit and review. A limited class of repair for a specific make/model will be too burdensome for the government to manage.

#### ***b. What is an appropriate mechanism to recognise factory provided EV training?***

Manufacturers that have an RTO can provide nationally accredited UOC or skill sets.

### **Transition period**

#### **4. Should a transition period apply for upskilling? If yes, what is an appropriate transition period?**

Given the demand for the MTA WA Training (skill sets) and acknowledging that TAFEs are only just starting to offer EV qualifications, the industry would need a minimum of 24 months to have completed courses to upskill their qualifications. Only franchise dealer technicians who have received product training and technicians who have upskilled should be working on BEV & HEV. New apprentices would not be included as they would be in training and under the supervision of someone who holds the UOC to work on BEV & HEV.

#### **5. Should different transition periods apply for repairers who undertake EV service and repairs compared with repairers who undertake other work, for example panel beaters?**

12-18 months for basic safety awareness and 12-24 months for skill set completion.

## **5. Minimum safety training for all repairers to promote safety**

### **Questions**

#### **1. What safety training, if any, is currently being used to ensure that repairers can interact safely with EVs?**

MTA WA Training Inc. offers (2) courses (1) online with a practical assessment component. Without students completing the practical assessment component they would not receive the UOC. The second course is delivered in-house. Both courses include depowering and reinitialising UOC AURETH101 and AURETH011. The units cover the fundamental requirements for interacting safely and confidently while working with high-voltage electrical systems to conduct the inspection and servicing of battery and hybrid electric vehicle systems and components in the automotive retail, service and repair industry.

***2. Should EV safety training be prescribed through the motor vehicle repairer legislation for all repairers who interact with EVs?***

Yes, if possible. The difficulty is those who fall outside the licensing regime who interact with BEV & HEVs such as first responders, recovery vehicle drivers and consumers. Given there is no pre-requisite to complete the (2) units listed above businesses or individuals could complete the training to reduce risk to employers & employees that interact with BEV & HEV.

***3. If yes:***

***(a) Are there any repair classes that do not need to be trained in EV safety?***

There may be limited classes of repair that may not be affected by EV safety such as TFW, WSS, ERW and DSW for example.

***(b) What is the suitable minimum requirement for safety and awareness?***

AURETH101 and AURETH011

***(c) Is there an existing qualification, or combination of units, that would provide suitable minimum safety and awareness training?***

AURETH101 and AURETH011

***4. What are the cost implications of repairers having to complete additional training?***

Minimal given the safety risk, \$675 - \$1,000.

**Supervised repairers**

***5. Given the unique safety risks associated with work on EVs that do not exist for ICEs, should all repairers who work on EVs be certified (i.e. there will be no option for an uncertified repairer to work on an EV, even if they are supervised)?***

Yes, all BEV & HEV repairers should be certified due to the level of risk, careful consideration should be given to how BEV & HEV work is defined and what is considered interaction with a BEV or HEV. Apprentices and those enrolled in training would be excluded from this requirement as they would be working under supervision.

***6. Alternatively, if uncertified repairers are permitted to work on EVs, is the existing supervision ratio of one certified repairer to every three uncertified repairers appropriate, or should a lower ratio apply?***

No, given the risk of injury or death, all repairers should be certified to work on EVs.

***7. What are the risks to the safety of a repairer or to consumers if an uncertified (but supervised) repairer undertakes repairs on an EV?***

Electrocution, injury or death.

## **Transition period**

### ***8. Should a specific transition period apply for general safety training? If yes, what is an appropriate transition period?***

12-18 months for general safety training for people who interact with electric vehicles.

## **6. Further review of repairer certification**

### **Questions**

#### ***1. Are there other combined or alternative fuel systems that require a separate repair class, for example hydrogen fuel cell vehicles?***

Potentially in the future, we will need an alternative fuel system class of repair, this will depend on the technology of the fuel system and what level of interaction will be required for service and repair of the system. Hydrogen fuel cell technology is predominantly an EV with the addition of the fuel cell to create the Electricity to charge the battery. Additional duties could be added to work on the hydrogen system within an electric vehicle class of repair work. Hydrogen or Biomethane ICE vehicles may be compatible with current classes that allow work on petrol, or diesel-powered ICE vehicles.

#### ***2. Other than new fuel systems, are there any emerging issues related to repairer certification that you think could be included in further consultation?***

MTA WA has raised the following industry sectors that are required to be certified but cannot gain a suitable qualification or training course to become certified.

- Light vehicle trailer repair sector (caravans and light trailers)
- Exhaust fitters
- Engine reconditioners
- Paintless dent removal

End.

For further information on this submission please contact Graham Cawley, General Manager of Membership & Industry Engagement [graham.cawley@mtawa.com.au](mailto:graham.cawley@mtawa.com.au) or 0428 138 848.