



15 November 2022

The Hon. Chris Bowen MP  
The Hon. Catherine King MP

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## **ETU Submission to the National Electric Vehicle Strategy Consultation**

The Electrical Trades Union of Australia ('the ETU') is a division of the Communications, Electrical and Plumbing Union ('the CEPU').<sup>1</sup> The ETU is the principal union for electrical and electrotechnology tradespeople and apprentices in Australia, representing well over sixty-thousand workers around the country. The CEPU represents close to one hundred thousand workers nationally, making us amongst the largest trade unions in Australia.

In the spirit of reconciliation, the ETU acknowledges the Traditional Custodians of country throughout Australia and their connections to land, sea and community. We pay our respect to their Elders past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples today.

The ETU welcomes the opportunity to make this submission as a record of the videoconference consultation which occurred on 25 October 2022 on the National Electric Vehicle Strategy Consultation Paper.

The Electrical Trade Union (ETU) broadly supports the consultation paper and the work underway. It is important work that is long overdue and we welcome the Government making it a priority. One of the key objectives of the National Electric Vehicle Strategy (the Strategy) must be determining how the federal government can use the policies and procurement mechanisms at its disposal to encourage states to move to a common standard across Australia for electric vehicles – in a way that does not slow down progress.

A key risk emerging in the electric vehicle sector is the lack of common user facilities, single national training standards, a common safety framework and a common set of technical standards. If not addressed, these risks will manifest negatively for both consumers and workers resulting in a suboptimal transition in the transport sector.

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<sup>1</sup> CEPU is a registered organisation under the *Fair Work (Registered Organisations) Act 2009* (Cth).

The ETU submits the following comments in response to the matters raised in the consultation paper and propose that the following should be considered when developing the Final Strategy:

- One of the goals canvassed in the consultation paper is to 'reduce emissions' – it would be useful to specify what this includes to understand the scope of this policy. Is it reductions generally or is it reductions specifically? A clearer goal may be:
  - Reduce emissions in the transport sector.
- One of the objectives is to 'encourage rapid increase in demand' – this should specify the desired percentage increase in demand and by when this should be achieved. It is also useful to note whether there will be targets in terms of supply and diversity of EVs, and whether there will be different targets for regional and metropolitan areas.
- Dormant vehicle testing infrastructure could be used to test EVs to Australian standards. This would encourage offshore OEMs to refine EVs to the Australian context.
- Ensuring common standards across Australia is a major issue. Uniform standards should be established around training, charging infrastructure and connection points for infrastructure. The European Parliament legislating new rules this year to introduce a single universal charger for a wide range of electronic equipment is instructive. The inconsistencies in training, charging infrastructure and connection points is a major barrier to EV uptake.
- Efficiency standards are crucial to reduce the risk that Australia becomes a dumping ground for non-efficient vehicles. There is also a risk that Australia will miss out on manufacturing opportunities if we do not move on these efficiency standards as soon as possible. (question2)
- A whole-of-government fleet purchasing policy could include a resale component, ensuring accessibility for low and middle income people. For example, a percentage of the second-hand government fleet could be auctioned to low- and middle-income earners.
- Government could play a role in coordinating the insurance industry for transparency around accident and theft data. EV's usually have sophisticated security and safety systems while also having an absence of oils / fluids that are present in ICE vehicles meaning their risk and cost profile may be different. Transparency could play a role in setting appropriate insurance premiums.
- Incentives for low emissions vehicles will need to be sustained for some period of time (at least 10years) to be staged with the timing of the current national electricity grid transition. However incentives will likely need to be adjusted over time. (question 5)
- Demand for EVs could be supported through grants or funding for Australian television shows to showcase EVs in the Australian context like Weekend Today, particularly for the boating, camping, fishing and campervan community.
- ETU agree that vehicle fuel efficiency standards are an effective mechanism to reduce passenger and light commercial fleet emissions, and that vehicle fuel efficiency standards would incentivise global manufacturers to send EVs and lower emission vehicles to Australia (questions 7 and 8 of the consultation paper).

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- In response to questions 11 and 12 of the consultation paper, ETU emphasised common user facilities as critical to help increase the supply of EVs to Australia and electrify the Australian fleet.
- Recycling should be highlighted in the Strategy, including the consideration of environmental impacts – for example, appropriate management of lithium waste.
- A Commonwealth government policy around fleets should encourage and support state fleet initiatives.
- There is a need to consider the role of the federal government in supporting state manufacturing initiatives and providing coordination across states and territories. Further research should be done to examine the most viable manufacturing sites for components of the EV supply chain.
- The government could introduce incentives for employers who provide employees with EV parking and charging facilities.
- The government could mandate that at the point of sale of an existing dwelling, the mains power board must be EV charger ready, by ensuring they are capable of having circuits to run EV chargers. This would also play a role in ensuring the safety and consistency of charging facilities in existing dwellings. Similar to the requirement to upgrade homes to ensure they have a safety switch at the point of sale which has proven a very successful and comparatively low cost public policy decision.
- Codes of practice and standards for EV chargers and infrastructure should be harmonised across Australia. Government should take urgent action to ensure home battery manufacturing standards are established so that home batteries are EV ready.
- The Federal Government should look to the Victorian Government policy for training standards associated with charging infrastructure.
- The Strategy should prioritise the establishment of common training standards for the EV workforce, and ensure they do not conflict with Australian electrical laws.
  - The ETU has identified some issues with a course (AUR32721) that refers to AS 5732, which includes some conflict with the wiring rules, (AS/NZS 3000:2018, Electrical installations).