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By email: consultation@energysafe.vic.gov.au.

Submission on the Consultation on Electrical Safety Requirements for e-transport devices

Amazon Commercial Services Pty Ltd (Amazon Australia) welcomes the opportunity to provide a response to the Consultation on Electrical Safety Requirements for E-transport Devices.

Amazon Australia supports Energy Safe Victoria's (ESV) objective to ensure that e-transport devices are certified to safety standards and clearly marked before they can be sold in Victoria. We are also supportive of regulatory changes that would recognise trusted overseas product safety standards as suitable standards to which products being sold in Australia may comply. Amazon Australia also supports the harmonisation of regulatory standards within Australia. We believe the proposed changes will benefit both consumers and industry by maintaining high safety standards whilst facilitating entry of goods into Australia, enhancing competition and lowering prices for customers currently facing a cost-of-living pressures.

Our response provides an overview of Amazon and our operations in Australia, a description of our compliance systems and processes, as well as data and anecdotes from selling partners¹ who sell products in our store. We have also provided detailed responses to areas of concern in the Consultation Paper. In general, while Amazon Australia strongly supports the safety of e-transport devices through certification to safety standards, we hope that the proposed reforms will take into consideration harmonisation of these safety standards within Australia, given that the listings on our store are available for sale to Australian customers nationwide and differing certification standards between states will increase the cost of compliance significantly, ultimately impacting consumers.

About Amazon Australia

Amazon Australia launched the Amazon.com.au store in December 2017 and now offers Australian customers over 200 million items across 31 categories, from consumer electronics to fashion to Amazon devices such as Alexa and Kindle. In June 2018, we launched Amazon Prime, our flagship membership program, including free domestic shipping in as fast as same-day in select areas, plus entertainment benefits including Amazon Prime Video. Since 2011, Amazon has invested over A\$25 billion across all its business in Australia, including more than A\$5 billion in 2024 alone. These businesses employ more than 7,000 people nationwide.

At a time when cost-of-living remains top of mind for Australians, Amazon is working hard to offer customers a broad selection of products with fast delivery and competitive prices. In fact, research by Mandala Partners (['Surf, Shop and Save'](#)) released in 2024 found that Australia's inflation crisis would have been worse if it wasn't for lower prices and increased competition from online retail channels such as Amazon.

¹ "Selling Partners" encompass both retail vendors and third-party sellers who offer products in the Amazon.com.au store



More than 14,000 Australian businesses are selling their products in Amazon's stores globally, including Amazon.com.au. Globally, more than 60 per cent of Amazon's unit sales come from third-party selection through an Amazon store. Australian businesses can ship products they sell to customers directly or use the Fulfilment by Amazon (FBA) service to ship their products to customers across Australia. FBA saves valuable time and money for businesses as they do not need to individually purchase shipping materials, pack orders, store products, and make multiple trips to the post office.

Amazon and its commitment to product safety

Customer safety is a top priority for Amazon. We aim to ensure that customers can be confident in finding a comprehensive selection of relevant products without having to question product safety, quality, or reliability. We also aim to ensure that each selling partner can offer the appropriate products for sale, with real-time safety approval to sell where required.

Amazon also supports efforts to continuously improve product safety measures and frameworks. We want these measures and frameworks to be ambitious, relevant and appropriate to tackle the changing demands of 21st century retail. We were particularly pleased to be a founding signatory to the first Australian Product Safety Pledge (the Pledge). The commitments we have made under the Pledge reflect the long-standing and constantly evolving protections we provide to our customers when they shop on our store.

Response to questions in the Consultation Paper

Section 2.2 Declaring e-transport devices to be controlled electrical equipment

Question 6. Do you have any other suggestions for defining e-transport devices, including whether we need to clarify exclusions?

We note minor differences between ESV and the New South Wales (NSW) Fair Trading in defining e-mobility devices such as e-bikes:

NSW Fair Trading defines e-bikes as **cannot be propelled exclusively by the motor** or motors except in "startup assistance mode".

ESV defines e-bikes as one or more electric motors to either assist the rider when pedalling or provide **motive power to the wheels when the rider is not pedalling.**

We would appreciate clarity on whether ESV's definition of e-mobility devices has the same effective meaning as that found within the NSW Fair Trading. If not, we would appreciate if ESV can provide clarity on the differences in definitions, including through examples of what is included and what is excluded.

Section 2.3 Safety standards

Question 9: What would be the impact of certification to different standards in different jurisdictions of Australia (e.g. different standards in VIC and NSW)?

Question 11: What would be the costs and operational impacts to your business of certifying and marking e-transport devices to meet safety standards? Please provide approximate figures or ranges, including any testing, labelling, or administrative costs, and how many product lines you would need to certify.

We note the topline differences between ESV’s proposed mandating only Australian safety standards and NSW Fair Trading’s acceptance of international standards like UL, IEC, EN, albeit with some modifications, as follows:

Type	ESV	NSW Fair Trading
e-bikes	<i>AS 15194:2016 – Cycles – Electrically power assisted cycles</i>	One of the following 3 options: <ul style="list-style-type: none"> • AS 15194 • <i>EN 15194:2017 +A1:2023 Cycles – Electrically power assisted cycles (EN 15194, the European version of the standard that AS 15194 adopted)</i> • <i>UL 2849:2022 Electrical Systems for eBikes (UL 2849).</i>
Electric Scooter, skateboard, self-balancing scooter	<i>AS/NZS 60335.2.114:2023 Household and similar electrical appliances - Safety</i>	One of the following 3 options <ul style="list-style-type: none"> • AS/NZS 60335.2.114:2023 • EN 17128:2020 • UL 2272:2024
E-mobility batteries	No explicit safety standard	EN 50604-1:2016 +A1:2021 UL 2271:2023 IEC 62133-2:2017 (<i>only for standalone batteries on Electric Scooter, skateboard, self-balancing scooter</i>)
E-mobility devices labelling	RCM mark	RCM mark OR any other REAS approval number such as TUV-xxxxxx-EA

The current fragmented approach to standards creates significant barriers:

1. Sellers of e-mobility devices in stores that sell to customers nationwide, including in the Amazon Australia store, would be required to test products against domestic standards for Victoria when the same products would comply with recognised international standards in NSW (like EN 17128:2020) resulting in additional operational resourcing and cost for no clear consumer benefit.
2. Acceptance of only domestic standards would act as a disincentive to cross-border sellers with internationally compliant products, reducing the available selection and competitive benefits for Australian consumers.
3. Additional labelling costs may also be incurred by sellers if they use certification bodies under the Recognised External Approval Schemes (REAS) by NSW Fair Trading and needing to additionally affix the RCM mark. If each state’s e-mobility regulations require their own version of the label, this will add cost for businesses and confusion for consumers, again for no apparent benefit. For instance, a supplier may need to affix 6 different product registration labels on one single e-bike.

We urge ESV to consider aligning its requirements with NSW Fair Trading or nationwide, aiming to:

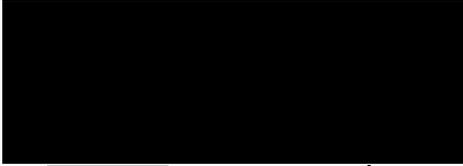
1. Harmonise the mandatory safety standards
2. Accept alternative product labelling
3. Recognise trusted overseas standards and conformity assessments
4. Align with international practices to reduce barriers while maintaining safety standards

This approach would benefit both consumers and industry by maintaining high safety standards while facilitating entry of goods into and within Australia, enhance competition and lower prices to customers currently facing cost-of-living pressures.



Amazon Australia remains committed to working with the ESV to implement efficient and effective safety standards for e-transport devices.

Yours faithfully,



Head of Public Policy, Amazon Australia/New Zealand

