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Submission in Response to the Consultation Paper: Electrical safety requirements for lithium-ion battery powered e-transport devices

October 10, 2025

To Whom It May Concern,

Thank you for the opportunity to respond to Energy Safe Victoria's recent consultation paper. Please find our responses to the outlined questions below.

1. Unclear proposed definition of “Electric Bike Conversion Kit”

Reference: Page 10, "Draft definitions for consultation", Question 5 & 6.

Reasoning:

The proposed definition of "Electric Bike Conversion Kit" is overly broad and lacks crucial specificity, leading to significant ambiguity. This ambiguity risks the misclassification of integrated eBike drive systems, such as those manufactured by Bosch. Our systems are specifically designed and supplied to bicycle manufacturers as core components of a complete, type-approved vehicle; they are not "conversion kits" intended for retrofitting by consumers or third parties. Conflating these two distinct product categories fundamentally misunderstands their respective design, supply chain, and regulatory contexts.

Impact:

This lack of clarity will cause significant confusion for both industry stakeholders and regulatory bodies. It complicates the process for obtaining a certificate of conformity, as manufacturers of integrated systems may be incorrectly required to certify their products under a standard not designed for them. This creates unnecessary administrative burden, hinders innovation in the integrated e-bike market, and ultimately compromises the goal of efficiently ensuring only safe and compliant products reach the market.

Suggestion:

We strongly recommend that the responsible authority refines the proposed definition to be more precise and to clearly differentiate between conversion kits and integrated drive systems. This could be effectively achieved by:

- **Providing a detailed, component-based list of what constitutes an "Electric Bike Conversion Kit,"** focusing on elements typically sold for aftermarket modification (e.g., separate motor, battery pack, controller designed for attachment to a standard bicycle frame).
- **Explicitly excluding integrated drive systems that are supplied directly to Original Equipment Manufacturers (OEMs) for factory installation** as a fundamental component of a new, type-approved electric bicycle. This ensures clarity for systems designed as integral parts of a complete vehicle from inception.

2. Harmonization of Standards with Other Jurisdictions

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Reference: Page 11-12, Section 2.3 "Safety standards", Question 9.

The paper notes that while NSW has adopted or modified standards like EN 15194 and UL 2849, these "cannot be called up under the Victorian legislation". This intention to establish a separate regulatory pathway for Victoria is a significant concern.

Reasoning:

- The European Union (EU) regulations, particularly EN 15194, provide a robust and internationally recognized framework for the electrical safety of e-bikes. Diverging from these established standards, and from the approach taken by other Australian states like NSW, will create a fragmented regulatory landscape. This forces manufacturers to undergo separate, redundant, and costly testing and certification processes for the Victorian market alone.

Impact:

- A Victoria-specific standard will not only increase costs and lead times for businesses but will also slow down the adoption of essential safety measures across Australia. It creates unnecessary friction in the national market, potentially limiting the availability of certain products for Victorian consumers and creating a competitive disadvantage for businesses operating within the state.

Suggestion:

- We urge Victoria to align its regulations with those of other Australian states and, where applicable, with established international standards like EN 15194. Adopting a nationally consistent approach will streamline compliance, reduce costs for industry, and ensure that safety improvements are implemented efficiently across the country.

3. Proposed Implementation Framework

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Reference: Page 12, Section 2.4 "Timing and phasing", Question 12 & 13.

We support the paper's acknowledgment that the industry will need sufficient time to comply with new requirements. Based on our experience with similar regulatory changes, we offer the following suggestions for the implementation timeline.

Suggestions:

- **Transition Period:** We propose a transition period of **18 to 24** months. This timeframe is necessary for the industry to manage existing stock, adapt supply chains, and conduct the required testing and certification without causing major market disruption.
- **Phased Implementation:** We strongly endorse a stepwise implementation approach, similar to the one rolled out in NSW. We recommend prioritizing the core safety requirements first, followed by administrative elements:
 - **Phase 1: Certificate Application.** Focus on ensuring all products meet the prescribed safety and certification standards.
 - **Phase 2: Labelling and Marking.** Once the certification framework is established and running, introduce requirements for product labelling.

Yours sincerely

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