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Subject: Cargocycles - response to Consultation Paper
Date: Wednesday, 8 October 2025 11:51:41 AM

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Response for

Electrical safety requirements for lithium-ion battery powered e-transport devices
Consultation paper, August 2025.

Prepared by [REDACTED]

1. Do you agree with our proposal to declare e-transport devices and associated lithium-ion batteries as “controlled electrical equipment” under the Act? Why or why not?

Yes. They definitely need tighter controls to reduce negative affects of current lax import regulations.

2. Are there alternative approaches you believe would effectively manage the electrical safety risks associated with lithium-ion battery powered e-transport devices?

Whatever changes are made to improve electrical safety need to be adopted across the country. We have spent a considerable amount of time trying to comply with the newly introduced NSW regulations. We sell 30-40 different e bikes, the cost to do this is not sustainable if each state applies different regulations.

3. If you are a user or potential user of e-transport devices, would knowing the product is independently safety certified impact your purchasing decisions?

Yes but I think the average consumer would expect this is already the case.

4. Do you agree with our draft definition for e-scooters, e-skateboards, and other etransport devices?

Yes

5. Do you agree with our draft definition for e-bikes and e-bike conversion kits?

No to the ebike definition. This might allow for bikes to be propelled by the motor alone which allows for illegal throttle bikes. The definition should be linked to the relevant standard eg AS15194.

The Ebike conversion kit defintion sounds reasonable but again there is no

standard to link the kits to so low quality kits are imported and sold through dubious channels.

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

I don't see why any exclusions should apply.

7. If you are a supplier/manufacturer/importer, what standards are your e-transport devices currently complying with?

We are an importer of ebikes from European and US based suppliers. They comply with EN15194. Cargo bikes coming from Europe are now also using DIN 79010 or EN17860. The latter add additional bike strength tests to EN15194.

8. Do you have any comments on the electrical safety shortcomings of AS 15194? How do you think these shortcomings can be best addressed?

The primary purpose of AS15194 is not about electrical safety, it's an Australian standard that follows the European EN15194 standard. Recognising UL2849 might make things easier for suppliers.

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

We have already spent many hours trying to comply with the NSW standard and the certificate agencies are hard to deal with because they are unsure of the documents that are relevant, not to mention the cost of trying to comply. Some of the bikes we sell have been in production for more than 5 years so the original testing documents are being rejected. These bikes use motor and battery systems produced by Bosch or Shimano in the last 2 years but the bike as an entity is being rejected. These are successful products sold worldwide using electrical components tested to European or US standards, their lifespan is longer than 5 years. It would be so much better if Australia could adopt one of these standards.

10. What type of guidance would you need, if any, to clarify how to comply with the technical construction requirements of AS/NZS 3820?

This would be an impossible task if it were required for the entire bike. The chargers already comply. The manufacturers do not test bikes to this standard because no other market recognises it. Even if they did, we would have to pay for the testing for products that have already been in market and it is unlikely to be cost effective.

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.

Based on the NSW requirements - 30-40 product lines with a testing fee of approx \$ [REDACTED] per unit. 100 hours of staff time at say \$ [REDACTED]. Approx \$ [REDACTED].

12. What factors should we consider when assessing the timing of new

electrical safety requirements for e-transport devices?

The ability for suppliers like us to be able meet the requirements in a reasonable timeframe eg 12 months and have ironed out the correct testing documents that would need to be presented in order to comply.

13. If you are a supplier/manufacturer/importer, how much time do you estimate is needed to achieve compliance with new certification and marking requirements for e-transport devices and associated batteries? Please provide as much information and evidence as possible.

30-40 product lines = 100 hours of staff time at say \$ [REDACTED] Plus the fees for the certification. Based on NSW work so far. It is quite challenging to make this happen and we will have to pass on the cost to consumers.