

Consultations

Energy Safe Victoria

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10 October 2025

Ref: Submission to Consultation paper – Electrical safety requirements for Lithium-ion battery powered e-transport devices

Certification Body Australia (CBA) is grateful for the opportunity to provide a submission on the regulation of Lithium-ion battery powered e-transport devices.

CBA is a JASANZ accredited product certification body, certifying electrical equipment and telecommunications customer equipment. CBA operates as a Recognised External Approval Scheme (REAS) certifier and a Recognised External Certification Scheme (RECS) certifier.

CBA supports the Energy Safe Victoria proposal to declare Lithium-ion battery powered e-transport devices and the associated Lithium-ion batteries as controlled electrical equipment.

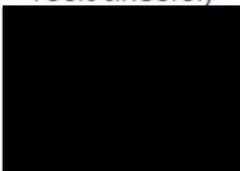
We encourage Energy Safe Victoria to align as much as possible with the NSW regulation of e-bikes and e-micromobility devices to allow for a more harmonised approach between different jurisdictions and reduce compliance costs for the industry.

We also encourage Energy Safe Victoria to support the current Standards Australia project which will revise the scope of AS/NZS 60335.2.114 to include e-cycles and conversion kits.

CBA does not support allowing the use of technical construction files (TCF) for certifying such controlled electrical equipment as the criteria for achieving a compliant outcome is unclear. Such high-risk products that require marking with a certificate number should undergo a certification process and should only be certified using accredited testing.

It is not clear if Energy Safe Victoria is intending to allow private certifiers to certify e-transport devices under the proposed arrangements. We encourage Energy Safe Victor to recognise RECS certifiers for the certification of e-transport devices.

Yours sincerely



Technical Manager
Certification Body Australia