

Lug & Carrie Pty Ltd
329 Napier Street
Fitzroy, VIC 3065
1 300 766 552
info@lug-carrie.com

13th of October, 2025

**Subject: Submission Regarding Energy Save Victoria Consultation
Process: Electrical safety requirements for lithium-ion battery powered
e-transport devices**

To Whom It May Concern,

This submission is in response to the consultation process led by Energy Safe Victoria on the proposal to make e-transport devices and their lithium-ion batteries “controlled electrical equipment” under the *Electricity Safety Act 1998* (VIC).

As a leading provider of e-bikes in Victoria, offering both sales and subscription services, we currently have over 1000 families riding on a Lug & Carrie bike in Victoria. Lug+Carrie operates with the highest battery standards, *exclusively using Bosch batteries, which are renowned for their safety and quality*. We are deeply invested in promoting sustainable urban transport and have worked with local councils across Metropolitan Melbourne to implement behaviour change programs to increase the number of people riding in Victoria.

While we acknowledge the concerns regarding lithium-ion battery fire incidents and the importance of introducing safety standards on e-transport devices, we believe that placing e-bikes under the *Electricity Safety Act 1998* is not the right response to address the current safety issue with several detrimental impacts. The increase in fire-related incidents is largely attributable to lacking import controls and insufficient and unharmonised safety standards for e-bikes and their batteries across Australia. Addressing these issues at the source is crucial.

Specifically, we highlight the following concerns:

- **Inconsistent Regulation Across States:** The lack of a unified national framework and the development of differing e-bike regulations across Australia's states and territories are creating confusion for consumers and complexity for suppliers. This regulatory inconsistency limits the industry's ability to scale efficiently and maintain consistent product quality. It also opens the door for low-quality or non-compliant products to enter the market, as neither suppliers nor consumers have clear or consistent quality standards to adhere to.
- **Increased Compliance Costs for a Small Industry:** Implementing multiple, state-specific regulations is costly and time-consuming for an industry still recovering from the effects of COVID-19. For example, our products are already certified by NSW Fair Trading under the new e-bike battery safety regulation. Additional state-based testing requirements have resulted in significant extra expenses with costs of over \$[REDACTED] per eBike model, which could result in smaller brands exiting the Victorian market.
- **Need for National Alignment with International Standards:** Australia should align its regulatory approach with international best practice by adopting the EN15194 and UL2849 standards, as already implemented in major global markets. Updating the Australian Standard AS15194 accordingly would ensure safety, reduce duplication, and eliminate the need for fragmented state-by-state solutions.

We urge Energy Save Victoria to consider alternative measures that balance safety concerns with the agenda to promote sustainable transport.

Thank you for the opportunity to provide this submission. We are available to discuss this matter further and contribute to a balanced and forward-thinking regulatory framework.

Sincerely,

[REDACTED]

[REDACTED] 13/10/2025

Director of Lug+Carrie PTY LTD

Questions for Consultation

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?

We do not support a declaration and subsequent regulations that would create a market requirement unique to Victorian suppliers/consumers. We do not think managing eBikes in the same way as electrical household equipment is the right approach to this issue as the production/supply/usage of these items differ greatly, and the safety of eBikes also relates to the functional design of the non-electrical components of the bicycle.

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

1. Adopting a unified, national eBike definition and safety standard which is aligned with current global standards
2. Support enforcement of the existing regulations in place, including federal government import standards and Victorian road use requirements
3. Invest in education on eBike safety
4. Consider trade-in schemes for eBikes currently in market which do not meet Point 1 or Point 2
5. Focus any short-term interventions on the battery and chargers used in e-transport devices

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?

No response.

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

No response.

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

No response.

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

No response.

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

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?

Adopt the proposed amendment to AS15194 which closely reflects EN15194. It is critical that any regulation drawing on AS15194 will accept testing to EN15194 as representative data.

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

The financial burden of testing all products currently supplied in Victoria to multiple safety standards would result in leading brands limiting supply to or

possibly exiting these markets. This would see retailers unable to sustain businesses.

For consumers, certification to different standards across jurisdictions (e.g., VIC and NSW) would create an unharmonized market that is difficult to navigate. Variations in safety, quality, or operational requirements could lead to confusion and reduced consumer confidence, as users may be uncertain whether services meet consistent benchmarks nationwide. This lack of consistency is particularly problematic for individuals who already lack confidence in riding, as even small uncertainties can deter them from participating.

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

No response

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.

- Implementation of new testing requirements – \$████████ per model
- Typical number of models for a supplier:
 - Small brand 1–5
 - Medium sized brand 10–20
 - Large supplier 20–40+
- Loss of revenue from drawing down existing inventory (models that are in market and cannot be tested) – \$████████ for a medium sized brand
- Administrative costs \$████████ to implement new testing processes

12. What factors should we consider when assessing the timing of new electrical safety requirements for e-transport devices?

The timing of any new requirements corresponds to the standards adopted. If Victoria adopts existing standards, the compliance timeframe could be as short as 12 months. For new testing or marking requirements unique to Victoria, suppliers and retailers should be given a minimum of 2 years to implement and appropriate support to comply. The recent adoption process in NSW has shown that there needs to be a lot of communication between the regulatory body and the bicycle industry to ensure a smooth implementation.

Other factors to consider include:

- How products already owned and operated by consumers will be managed? Buy-back scheme of products that did not meet federal standards when imported?
- How standards will be enforced? At the point of sale or supply or usage?
- The role of battery manufacturers in compliance.
- How does hire or rental or leasing fit within the sale/supply definition.

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.

Product testing and certification is completed at the early stage of an eBike production cycle. Any necessary testing changes would take a minimum of 2 years to implement, allowing existing stock to move into the market.

- Product design and build – year 1
- Product testing and certification – year 1
- Product launch and initial production – year 2
- Product arrivals in AUS and supply into market – year 2

For all other questions,, please refer to the submission paper provided by *Bicycle Industries Australia (BIA)*, which we fully support and endorse.

Audit trail

Details

FILE NAME Energy Save Victoria_Submission Lug and Carrie - 13/10/2025, 09:33

STATUS ● Signed

STATUS TIMESTAMP 2025/10/12
22:34:25 UTC

Activity



SENT

██████████ sent a signature request to:
• ██████████

2025/10/12
22:33:40 UTC



SIGNED

Signed by ██████████

2025/10/12
22:34:25 UTC



COMPLETED

This document has been signed by all signers and is **complete**

2025/10/12
22:34:25 UTC

The email address indicated above for each signer may be associated with a Google account, and may either be the primary email address or secondary email address associated with that account.