From: [redacted]
To: Consultation
Subject: e-transport devices
Date: Thursday, 25 September 2025 1:32:16 PM

Re: Electrical safety requirements for lithium-ion battery powered e-transport devices

Definitions:

A bicycle with electric assist is different to an ebike. Ebikes are typically heavy and unsuitable or unpleasant for riding without an electric motor running whereas something designed as a pedal bike (push bike) is meant to be pedalled and remains readily pedalable after installation of a motor.

Adding a motor and battery to a bike does not make it an ebike. It makes it a bike with electric assist. Your definition does not adequately include 'bicycles with electric assist'.

Your definition has a potential flaw due to some bikes being designed to transport more than one person (tandems, side-by-side bikes, bikes with provision for one or more children).

Some children's toys are used in public places to transport 1 or more people and are powered by an electric motor and one or more rechargeable batteries. These are outside your proposed definitions. Due to possible substandard construction and fire risk, it may make sense to extend the definition to include such toys.

Fire safety:

I support stronger regulation to keep our communities free of fire-risk devices.

It is unfortunate that the community has allowed the 'wild west' of e-transport devices to progress as far as it has.

Once this process is implemented, it should lead to approved e-transport devices being sufficiently identifiable that they would no longer ned to be prohibited from trains or other locations.

Potential of proposals to be successful, and an alternative

Regulating what can be sold in shops may help to address things long term, but internet sales are much harder to regulate. It is hard to see how this kind of regulation could lead to device identification sufficient for public transport personnel to easily identify compliant vehicles (and so avoid the proposed 'blanket' prohibition).

Please communicate with that review to encourage that any 'blanket' prohibition be temporary and reassessed after the 'wild west' of e-devices is properly regulated.

An alternative method would be to require registration of all e-transport devices used in public places to transport 1 or more people if powered by an electric motor and one or more rechargeable batteries. Whether such registration is done by VicRoads, Energysafe Victoria or some other entity would need to be decided. Registration plates analogous to car and motorbike registration plates would make approved vehicles readily identifyable to rail staff etc.

Standards

Your paper states:

> "NSW requires compliance with UL 2849 for e-bikes exceeding 500 watts. Again, UL 2849 is not a
> “relevant standard” under AS/NZS 3820 and so does not apply in Victoria."

Standards are not legislation. They are guidelines. The statement above is a legal interpretation rather than a common-sense interpretation appropriate with the use of sucha standard. A European Standard about the same subject is a relevant standard. Perhaps the wording of AS/NZS 3820 needs minor tweaking to avoid such legalese confusion in future.

Maximum Power

The maximum power allowed in 250W. We have a 4-wheel side-by-side bike with electric assist. The bike weighs about 60 kg, and around 200kg when loaded. Rolling resistance, wind resistance and weight are approximately double that of a normal bike. In such situations, 250W is underpowered which can lead to overheating. 500W would be more appropriate for our bike.

Regards,

[redacted] **- check out our blog website!**