From: [redacted]
To: Consultation
Cc: [redacted]
Subject: Submission regarding proposed changes of e-bike and lithium battery legislation
Date: Sunday, 12 October 2025 11:49:40 PM

Dear Energy Safe Victoria,

We are a small family owned importer of e-bikes operating since 2013. We sell our e-bikes in all states of Australia.
We would like to provide feedback for the upcoming proposed change in e-bike battery safety laws in Victoria. We have worked closely with the NSW government and have provided feedback to them during the recent change of e-bike legislation in NSW. Please find our feedback for VIC below:

1) Importance of aligning laws with other states in Australia: It is crucial that e-bike compliance requirements are the same in all states of Australia. Otherwise different safety tests need to be done for different states and e-bikes need to be manufactured in different ways for each state. This blows out costs. Those costs need to be passed on to consumers.

2a) Accepting international standards reduces testing cost. Accepting products with existing safety test reports allows importers to source safe products with little additional costs for Australian compliance.

International safety standards for Battery packs:
IEC 62133-2:2017
EN 50604-1:2016+A1:2021
UL 2271:2023

International safety standards for E-bikes
EN 15194:2017+A1:2023

2b) It is crucial to only require compliance with specific clauses of standards which are relevant for electrical and fire safety, as done by NSW in its latest update of the regulations. Requiring compliance with all clauses of certain safety standards, for example mechanical safety, will complicate the safety testing and blow out costs with no electrical safety benefits.

2c) Finding a way for the VIC legal framework to accept international standards. It is my understanding that VIC legislation does not allow acceptance of international standards except for IEC standards. There may be a workaround by creating AS standards which are based on EN standards. For example the current AS 15194 standard is based on the EN 15194 standard, with some small modifications for Australia. This makes testing easier since the testing laboratories are familiar with the EN standards. There may be a workaround for accepting existing international safety reports, e.g. EN 15194:2017+A1:2023, by releasing an updated AS version of this standard, for example AS 15194:2025 which is based on EN 15194:2017+A1:2023. Then, for example, the VIC legislation could refer to compliance with AS 15194:2025, clause 4, which is in fact identical with EN 15194:2017+A1:2023 clause 4, allowing for easy testing and compliance.

3) importance of accepting existing safety reports. This is a technicality but it is important to explicitly accept existing accredited safety reports and certificates (we suggest no older than 5 years). The reason is that some testing labs insist on testing certain products from scratch in order to get certification. This would lead to double-testing and unnecessary costs. This is especially important for battery chargers, as well as for batteries and e-bikes.

4) Timing and phasing: allow at least 2 years after the final law is published to allow for testing , certification and manufacturing according to new standards.

5)Keep the 250W continuous motor power limit as per the EN 15194:2017+A1:2023 standard. Testing laboratories are familiar with 250W tests as per the European standard. The 500W power limit in NSW is a unique legal situation, out of scope of the EN standard and creates challenges for testing laboratories and the

certification process.

6) We are not familiar with the AS/NZS 60335.2.114:2023 standard. For example, the large testing laboratory TUV SUD in China has advised that they are not accredited for this standard. It appears to be a little known standard, likely requiring the testing of products from scratch. This will lead to high testing costs and therefore we ask to consider carefully whether it is a sensible option to only allow compliance with the AS/NZS 60335.2.114:2023 standard as compared to also allowing compliance with the widely known EN 15194 standard. Piggy-backing off international standards allows easy sourcing of already safety compliant products with little compliance costs, which also means savings for the consumers. In contrast, introducing new standards requires testing from scratch, including new product development and is therefore very expensive.

I hope the above input helps. We are open to provide more assistance if needed.

Kind regards,

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