



NSW Fair Trading
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To whom it may concern

Thank you for the opportunity to provide feedback on the proposed *Motor Dealers and Repairers Regulation 2025 (NSW)* ('the Regulation').

The NSW Small Business Commissioner (the Commission) is an independent statutory office of the NSW Government. It provides strategic advice, advocacy, and affordable dispute resolution services across NSW.

The Commission notes the proposed Regulation introduces a requirement for specialised training to perform certain tasks on Battery Electric Vehicles (BEVs). The Commission previously provided a submission in relation to the introduction of BEV repair classes and reiterates the importance of ensuring relevant training is widely available across the state. Prescribing specific qualifications may also make it more difficult to recruit qualified tradespersons or new apprentices.¹

A recent Commission survey of mechanics and motor vehicle repairers found that only 18 per cent currently hold BEV-related certifications.² Of the 82 per cent who do not, roughly two in five businesses (38 per cent) expressed a desire to obtain such qualifications, while the remaining three in five (62 per cent) indicated no interest at this stage.

Among businesses interested in pursuing BEV qualifications, but not currently holding certifications, the main barriers identified included:

- Lack of available courses in regional areas.
- Inability to release staff to attend training due to operational demands.
- High costs associated with training and downtime.

Businesses that did not express interest in BEV training commonly cited insufficient consumer demand, with many continuing to predominantly service petrol and diesel vehicles. There was also a degree of scepticism regarding the rate of BEV uptake in Australia, particularly in regional areas.

The Commission encourages the development of a coordinated education and awareness campaign to inform businesses about the availability of BEV qualifications and the long-term benefits of upskilling in this area. Business owners should be made aware that their trade certification will be restricted from working on BEVs if they do not complete the necessary training.

It is the Commission's view that training opportunities should be widely accessible and affordable, including through TAFE NSW and other appropriate Registered Training Organisations, with equitable availability across metropolitan and regional locations.

¹ [NSBC Submission to Department of Customer Service - introduction of Light Electric Vehicle mechanic and Heavy Electric Vehicle mechanic repair classes in NSW](#) (December 2022).

² Survey conducted between 15 May 2025 to 27 May 2025 with 251 respondents. The Survey is conducted through an online survey platform.

Additionally, the Commission encourages for any new repairer classes to be covered by the Motor Vehicle Insurance and Repair Industry Code of Conduct and capable of benefiting from the Alternative Dispute Resolution provisions of the Code.

Thank you for the opportunity to make a submission. If you require further information, please contact Megan Bennett, at either commission@smallbusiness.nsw.gov.au or (02) 9372 8767.

Yours sincerely

Mark Frost
Acting Commissioner
NSW Small Business Commission

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