

Policy Team

NSW Department of Fair Trading

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## **Submission on Mandatory Information Standard on E-micromobility Vehicles**

OCN welcomes the opportunity to provide input into the mandatory information standard, regulatory impact statement (RIS) and draft information standard template on e-mobility vehicles that are proposed to come into force in 2025.

The Owners Corporation Network of Australia (OCN) is the independent peak consumer body representing the rights and interests of residential strata and community title owners and residents across Australia. OCN is uniquely positioned to understand the needs and constraints within the strata sector. OCN are experts in residential strata, hence our comments relate to what our members are seeking.

OCN strives to create a better future for residential strata and community living and ownership. We support the transition to resilient, empowered communities living in climate ready, defect-free buildings, including solar, e-mobility and electric vehicle charging.

More than one in ten Australians live in strata – live in an apartment. In our major cities this is closer to one in four and to meet the projected demand for housing this will increase to one in two, or 50% of the population by 2050. Over 2.5 million people live in strata households in Australia. NSW, which has the largest sector, has just over 89,000 residential strata schemes housing 1.3 million people. It is the fastest growing type of dwelling, with over a thousand new schemes being registered each year\*.

## **Response to regulatory impact statement (RIS)**

### *Responding to the questions on page 21*

1. OCN strongly supports the introduction of a mandatory information standard for e-micromobility vehicles. It's vital consumers know there is a decisive difference in safety between high quality and low quality products. Consumers need to know there is a genuine safety risk to them and the public with poor quality products, but that good quality products, used correctly, are extremely safe. They do not need alarmist fear-mongering from the media that brands all battery vehicles as fire risks.
2. OCN's detailed suggestions to improve the draft information standard are below.
3. The commencement timeframe seems appropriate. As quickly as possible, allowing reasonable time for sellers to comply.  
OCN suggest mandating a prominent warning sticker or imprint on all Li-ion batteries to remind users every time they charge.

4. A key problem is that chargers and batteries are often generic, with common DC 'barrel' plugs. These can have a wide range of voltage and current ratings, and can be wired centre-positive or centre-negative. This makes it very easy for a consumer to connect an unsuitable charger or power supply to a battery pack, with potentially disastrous consequences if the battery isn't well protected.

OCN suggest mandatory prominent labelling on both batteries and chargers to make it clear which goes with what, with voltage and current clearly legible. For example, on battery "Use [BRAND] [MODEL] 24V 4A charger only" and on charger "24V 4A charger for [BRAND] [MODEL] batteries". Include a prominent diagram showing which terminal of the connector is positive/negative.

It would be ideal to prohibit the common 'barrel' plugs on higher voltage/current uses and mandate a more suitable connector that can't be inadvertently connected to the wrong supply.

## **Response to Draft Information Standard Template**

OCN makes the following notes and suggestions for your review:

### Throughout

Use 'Li-ion'. The chemical symbol for lithium is Li. Not 'li-ion' or Lithium. It's currently inconsistent.

Use active voice, not passive and edit for readability.

OCN suggests the document needs a 'hard edit'. Ideally it would be a single A4 sheet, or perhaps a four page A5 folded sheet. The stock it is printed on, colours etc should be chosen to make it clear this is something to be read and kept. Currently the document looks generic and somewhat bureaucratic. OCN suggests that the folded document be attached to the product.

### Road use

This needs, ideally, a clear statement of whether the specific device is permitted for road use or not. And, if so, where and how. Failing that, it needs information to find this out. Perhaps a URL and QR code.

### Electrical safety

Put the second warning in active voice and make it clear. Passive voice and terms like 'spontaneous combustion' make it less urgent and may not be intelligible to non-native English speakers.

e.g.: "WARNING! Using the wrong batteries or chargers could start a fire."

Perhaps add 'balcony' to the second bullet point under WARNING – Always pay attention to your battery and charger....

Perhaps add a bullet: Charge on concrete, tile or other non-flammable surface, protected from weather.

#### Safe Product Storage

Add: Do not store in a hallway, near a door or anywhere that could prevent safe exit in a fire.

#### Fire safety & emergency procedures

After 'electrolyte' add an explanation: '(the liquid or gel inside the battery)'

### **General**

OCN advocates for additional regulation relating to the modification of e-mobility devices. The data supports that many dangerous fires result from modification of devices and inappropriate use of batteries and chargers. Yet regulation to date has stopped short of legislating against such modifications. OCN understands the issues with enforcing such legislation but is of the view having such legislation in place is at least some deterrent.

As the key consumer voice for strata, OCN is available to engage with the NSW Department of Fair Trading regarding this submission, and to develop solutions to the issues identified.

Regards

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#### **\*Related OCN Submissions and Resources:**

1. Strata Data -  
[https://cityfutures.ada.unsw.edu.au/documents/717/2022 Australasian Strata Insights Report.pdf](https://cityfutures.ada.unsw.edu.au/documents/717/2022_Australasian_Strata_Insights_Report.pdf)
2. Federal inquiry into the transition to electric vehicles;  
<https://ocn.org.au/inquiry-into-the-transition-to-electric-vehicles/>
3. Federal inquiry into residential electrification, provided evidence to the ensuing Senate Committee and provided a supplementary submission;  
<https://ocn.org.au/inquiry-into-residential-electrification-ocn-supplementary-submission/>
4. NSW Consumer Energy Strategy;  
<https://ocn.org.au/nsw-consumer-energy-strategy-2024/>

5. Review of the Australian Energy Regulator exemption framework for embedded networks;  
<https://ocn.org.au/review-of-the-australian-energy-regulator-exemptions-framework-for-embedded-networks/>
6. IPART review of Embedded Networks in NSW;  
<https://ocn.org.au/ipart-review-of-embedded-networks-in-nsw/>
7. Australian Consumer Law and Owners corporations;  
<https://ocn.org.au/australian-consumer-law-owners-corporations/>
8. Protecting Consumers from Unfair Trade Practices;  
<https://ocn.org.au/unfair-trade-practices/>
9. NSW Parliamentary Inquiry into Electric and Hybrid Vehicle batteries and subsequently provided evidence at a recent parliamentary inquiry.  
<https://ocn.org.au/electric-and-hybrid-vehicle-batteries/>