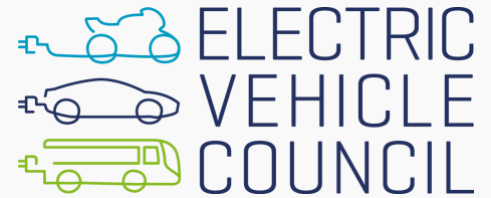


So you want to import/supply/install EV charging equipment? Here's what you need to know.



Disclaimer:

This is an FAQ-style response. It is not to be interpreted as legal guidance. Please do your own research around legal requirements in your jurisdiction before making business decisions around becoming an importer, supplier or installer of EV charging equipment.

We want to import EV charging equipment

It's electrical equipment so, as the importer, you're on the hook if something goes wrong. Your responsibilities include, but are not limited to:

- ♦ making sure the product is compliant to all relevant standards
- ♦ conducting recalls if they are required
- ♦ engaging with regulatory bodies to the extent needed

Your starting point for this will be AS/NZS 3000:2018, AS/NZS 3820:2020 and the requirements laid out by the electrical regulator in your state or territory. This will include compliance marking. You can find more information about your specific obligations here: www.erac.gov.au/equipment/equipment-safety-in-australia-and-new-zealand/ , www.eess.gov.au/, and <http://www.fairtrading.nsw.gov.au>.

If you're acting as the importer, it's often a good idea to do your own independent testing, rather than relying solely on the overseas manufacturers' declarations. Ultimately, if the product does not actually meet the required standard and a recall is required, being able to point to the manufacturer's claims does not absolve the importer of the cost of managing the consequences. Depending on your relationship with the manufacturer, you may find it difficult to recover these sorts of costs.

You can also expect to get questions from channel partners (i.e., suppliers, installers), relating to things like installation requirements, RCD (Residual Current Device) selection, etc. You'll need to be in a position to address these questions.

In the general electrical equipment space, the function of equipment importer is typically filled by established electrical equipment manufacturers, who maintain engineering teams in the country to assess products for suitability for importation into the country. Every electrician knows who all these players are – their hardware and brands are stocked in every electrical wholesaler across the country.

The EV charging space specifically is relatively new and dynamic. Regulations are changing relatively regularly and are expected to continue changing regularly over the next 10-15 years, so you will need to keep up to date on the requirements, so you can be sure the products you're supplying are compliant.

Despite these frameworks, there are no shortage of cautionary tales where electrical equipment was imported and sold without being compliant to Australian Standards. Two recent examples in the electrical equipment space are: www.accc.gov.au/update/infinity-cables-frequently-asked-questions, and www.worksafe.qld.gov.au/news-and-events/news/2019/pump-importer-prosecuted-for-townsville-electrocution-death

In the first case, an importer of substandard cable sold thousands of kilometres of electrical cable through a major hardware retailer among other channels (see [supplier](#), below), and declared bankruptcy when the problems became apparent. The suppliers in this case ended up partially footing the bill for the recall, because in the absence of an importer to go after, the ACCC pointed to the electricians and the other parties in the supply chain and relevant sections of Australian Consumer Law. To the extent that this cabling remains in Australian homes, we will see an increased incidence of house fires over the years to come.

In the second case, a small business operator chose to import a quantity of non-compliant equipment and take it to the market without meeting his obligations under the electrical safety laws. This resulted in a death directly attributable to the product quality and a significant fine for the business concerned.

These cases have parallels to the risks associated with the importation of equipment for the charging of electric vehicles. The Electric Vehicle Council (EVC) is supportive of a competitive market that brings many quality brands to the Australian consumer but strongly discourages businesses from becoming electrical equipment importers 'informally' without going through due process. The processes around electrical equipment safety exist to keep our community safe from fire and electrocution, they're there for a good reason.

We want to supply EV charging equipment

Suppliers typically form the middle ground between the importer and the installer.

In the traditional electrical equipment supply industry, these are the electrical wholesalers. They carry stock, provide support and guidance around specific applications, and handle credit terms and logistics with the thousands of small electrical contracting businesses around the country. Retailers selling domestic appliances designed for fixed wiring installation (electric ovens, air conditioners, etc.) would fall into this category as well.

The supplier typically has less responsibility (from a regulatory standpoint) than the importer or the installer, but can be held responsible and financially liable in cases where the importer is no longer available to be pursued. The Infinity cables issue noted above is a good example of this. The cautionary note here is that if you're planning to be the supplier and you're looking for importers to buy from, the smart move is to pick the ones with some credibility and track history.

The value of the supplier is in the support provided to the contractor and the end user, over and above what the importer provides. If you are considering entering the EV supply chain, and you're not an installer, this is likely to be a lower risk, lower effort, and lower cost point of entry than becoming an importer, provided you're sourcing quality equipment from reputable importers/manufacturers.

We want to install EV charging equipment

Are you an electrical contractor licensed to work in Australia? If so, go ahead and install EV chargers, paying attention to AS/NZS3000:2018. Unlike solar PV systems, no special ticket applies to EV chargers, your grade A license is sufficient. There are many reputable brands of EV charger available in the Australian market which can be sourced from many suppliers.

You will need to consider matters like maximum demand impact. Section 2.2.2(b) of [AS/NZS3000:2018](#) is handy in this respect: if the load can be scheduled or controlled, you may be able to avoid significant maximum demand impacts that will add cost to the installation.

If billing is contemplated, the EVC recommends close consideration of the National Measurement Institute (NMI) position on this matter: <https://consult.industry.gov.au/trade-measurement-policy-for-electric-vehicle>.

If the equipment you're looking to install is public DC chargers, be aware they're relatively big and heavy. These are a better fit for commercial and industrial electricians than domestic electricians but it's the same license requirement

As is usual with electrical installations, the installer is on the hook for any defects or issues associated with the installation. If the EV charger fails at some point down the track because it was installed incorrectly, the electrical contractor is accountable for that, not the importer or the supplier.

Not a licensed electrical contractor? You are expressly forbidden from installing EV chargers by law. The people who do this work take on a four-year apprenticeship to learn to do it safely, making a mistake with 240 V can fatally electrocute the installer or someone else down the track, or cause your house to burn down years later.

All of the above?

If you are looking to import, supply and install, then you'll need to cover off all the sections above.

Next steps

If you'd like to discuss these matters further with the EVC, or enquire about becoming a member, please reach out to us at office@evc.org.au.