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[Mandating cash acceptance | Treasury.gov.au](#)

Introduction

The EVC appreciates the opportunity to contribute to this important consultation. The EVC's mission is to accelerate the electrification of road transport, supported by a strong, expansive ecosystem of EV charging infrastructure. We recognise there are certain critical sectors in the economy where acceptance of cash payments should be mandatory, but the EVC is concerned that any such mandate could inadvertently affect payments at EV charging stations.

For the sake of clarity, the EVC is calling for a carve out from any cash acceptance mandates for EV charging and Charge Point Operators (CPOs). Imposing cash payments for what is an inherently digital infrastructure would have the effect of materially slowing the EV transition, jeopardising the Government's legislated emissions reduction targets and frustrating the decarbonisation of the Australian economy.

EV charging has always been cashless

As a relatively new industry, EV charging has not undergone the typical transition from cash to online payments; it is and has always been cashless. Given the nature of EV charging, deployments need to be operational anywhere, available 24/7 and at lowest cost. Systems are digital, charging stations are unmanned and payments typically app-based or 'tap-and-go'.

In fact, the Energy and Climate Ministerial Council has published a set of “Minimum operating standards for government-supported public electric vehicle charging infrastructure”.¹ The ‘Payment’ section proactively encourages options of “smart phone or website applications, or over-the-phone credit or debit card payment systems” which are options the vast majority of Australians are very familiar with.

Not only are EV charging stations unattended, employees would typically visit the charging location only for periodic inspections, maintenance and repairs. Mandating in-person cash collection would be much more expensive and introduce unacceptably high labour costs to this critical fledgling industry.

Alternatively, cash acceptance mandates without face-to-face interactions would likely push Charge Point Operators to install machines to accept the cash. These machines have historically been unreliable, not accepting particular coins and notes and would themselves need periodic repairs and maintenance.

A spokesperson for Evie provided the example of an installation with two fast chargers in a Council car park. The site is safe, well-lit and has 24/7 access but is not integrated with a shopfront. They noted a cashbox on site would encourage criminal activity and the Council would no longer support hosting of the infrastructure. They went on to say the EV charging industry is already facing headwinds from globally unique Australian requirements,² on top “A cash payment requirement would severely hamper the roll out.”

Furthermore, EV drivers are by definition digitally literate and will continue to be. As uptake ramps up to 100% by 2050,³ the cohort of people driving EVs will all be ‘digital natives’ capable of initiating a charge digitally; indeed they will have never known any other payment method. We also note that systems will likely get simpler to use and more automated with time.

Sticking global

The EV charging industry is nascent in Australia and working hard to stay abreast of EV uptake. It has based the rollout of EV charging systems on global technology proven to work, following international best practice.

No other country in the world has mandated cash transactions for EV charging and there is no reason to do it in Australia. A requirement of this nature would setback the industry considerably and jeopardise government targets for the broader EV transition.

In some respects, Australia’s EV transition is already being hampered by divergence from international standards. The higher costs and regulatory burden from unique requirements

¹ <https://www.dcceew.gov.au/sites/default/files/documents/minimum-operating-standards-electric-vehicles-charging-infrastructure.pdf>

² [General certificate of approval for electric vehicle supply equipment \(EVSE\) - Consult hub](#)

³ <https://www.dcceew.gov.au/climate-change/emissions-reduction/net-zero>

are well known.⁴ Charge Point Operators (CPOs) are not large companies, nor do they have large capital reserves to facilitate cash transactions. They have all their capital invested in accelerating the rollout of EV chargers and charging sites. A cash acceptance mandate would compromise CPOs' entire business model, diverge from global best practice and cripple the deployment of more charging sites in Australia - a real and perceived barrier to EV uptake.

If there is a desire to regulate payment requirements for EV charging, close consideration should be given to AFIR in the EU, particularly article 5.

Recommendations

Given the adverse effects that a cash mandate would have on Australia's EV charging industry, the EVC recommends that:

- EVs be carved out of any cash acceptance mandate, should it be introduced.
- Requirements on Australian Charge Point Operators remain consistent with global best practice and refrain from introducing bespoke, unaligned standards.

If you have any questions on this submission, please contact Michael, at office@evc.org.au.

Thank you for your consideration of our submission.

Yours sincerely,



Julie Delvecchio

Chief Executive Officer

Electric Vehicle Council

⁴ <https://www.infrastructure.gov.au/have-your-say/adr-harmonisation-review-2024-25>