

29 May 2025

The Hon. Anoulack Chanthivong, MP GPO Box 5341 SYDNEY NSW 2001 cc: alicia.sylvester@minister.nsw.gov.au

Dear Minister

Re: Submission on Motor Dealers and Repairers Regulation 2025 RIS

The Insurance Council of Australia ('Insurance Council') appreciates the opportunity to comment on the Motor Dealers and Repairers Regulation 2025 – Regulatory Impact Statement (RIS) and urges the NSW Government to re-evaluate the regulatory proposal for EV repair licensing contained in the Motor Dealers and Repairers Regulation 2025 RIS.

The Insurance Council is the peak national body representing Australia's general insurance industry, including insurers who underwrite the majority of motor vehicle insurance policies in New South Wales.

As such, the Insurance Council and its members have a strong interest in a regulatory framework that ensures motor vehicle repairs – including those on new technologies such as electric vehicles (EVs) – are conducted safely, efficiently, and to a high standard.

While we support the NSW Government's objectives of consumer protection and safety in the motor repair sector, we have significant concerns that the proposals outlined in the RIS, particularly the introduction of standalone licensing requirements for EV repair work, are not supported by adequate evidence or analysis and are disproportionate to the identified risks.

The basis of our concerns include:

- Lack of evidence and risk analysis The RIS provides no data on safety incidents or systemic repair failures involving EVs that would justify the proposed new regulatory intervention. This absence of evidence reasonably calls into question the necessity and proportionality of the proposed measures.
- Insufficient cost-benefit assessment and implementation planning The RIS does not provide any meaningful cost-benefit analysis, data on training industry readiness, or consideration of practical implementation issues. Important data points, such as the number of technicians requiring upskilling, the capacity of training providers, timeframes for compliance, and likely impact on repair costs and timelines, are notably absent from the RIS which provides no basis on which decision makers can analyse any trade-offs.
- Overreliance on survey data and stakeholder feedback The Department's claim of industry support for the proposal relies on stakeholder input that has not been transparently presented. The Department references survey results and opinions without detailing the evidence, methodology or representative weight of this feedback, making it difficult to ascertain how stakeholder views or industry realities have informed the outcome.¹ The claim of industry support does not align with the

¹NSW Department of Fair Trading. 2025. Review of motor trades gualifications and certification.



feedback we have received from our members and stakeholders such as the Australian Automotive Dealers Association and the Australian Automotive Aftermarket Association.

• **Misalignment with best-practice regulatory principles** – The proposal does not reflect the evidence-based, risk-focused approach recommended by bodies such as the NSW Productivity Commission² and the Independent Pricing and Regulatory Tribunal (IPART) in relation to occupational licensing.³ Best practice requires regulation only where justified by substantial risk or clear market failure, with measures proportionate to the identified issue. Given the absence of evidence demonstrating the scale of the problem, and limited analysis on how EV licensing would resolve it, we are concerned as to how the Department has been able to justify its conclusion that these reforms would reduce risks of poor EV repairs or improve consumer outcomes.

Noting these concerns, the Insurance Council recommends that the Department reconsider its approach and drop this proposal for this needless and costly regulation. At the very least it must utilise higher quality and more extensive evidence to justify its conclusions on the need for regulation and provide a more fulsome analysis of the cost and benefits likely to result. Only this way can industry stakeholders, the general public and decision-makers be adequately able to weigh up the trade-offs presented in the RIS.

If the Department remains of the view that regulation is justified, based on systematic evidence rather than mere stakeholder opinion, we propose, as an alternative an outcomes-based, risk-tiered, framework for EV repair safety, rather than the prescriptive licensing regime outlined in the RIS.

Key features of this recommended approach include:

- Focusing on outcomes and accountability Instead of mandating a blanket qualification for every individual working on EVs (regardless of the task), place responsibility on the licensed repair business to ensure all work is carried out safely by appropriately trained personnel. Businesses are already subject to general duties under workplace safety laws and consumer law to ensure competent service delivery.⁴ Leveraging these existing obligations with clear guidance on EV safety standards would be more efficient than creating a new individual licensing class for technicians.
- **Risk-tiered requirements** Recognise that not all EV-related tasks carry the same level of risk. High-risk activities (such as servicing or replacing high-voltage battery systems or other live electrical components) may warrant specific training or accreditation, whereas lower-risk tasks (such as software diagnostics or non-electrical maintenance on EVs) do not require the same level of regulatory intervention. A tiered approach will ensure that regulatory burdens are targeted only where necessary for safety, rather than treating every interaction with an EV identically.
- Industry-led training and standards Work with industry to develop practical training guidelines and certification pathways. Many automakers and registered training organisations already offer EV-specific training programs. These should be recognised and integrated into the framework (including acceptance of manufacturer training, internal company training programs, and robust Recognition of Prior Learning (RPL) for experienced technicians) instead of requiring a single, one-

² <u>NSW Productivity Commission. 2024. Better occupational entry regulations: Policy implications of new research.</u>

³ PwC for the Independent Pricing and Regulatory Tribunal. 2013. A best practice approach to designing and reviewing licensing schemes Guidance material

⁴ <u>NSW Department of Fair Trading. 2025. Proposed changes to repair classes and qualifications Remake of the Motor Vehicle Dealers and Repairers Regulation 2014.</u>



size-fits-all course. An industry-informed standard or set of guidelines, endorsed by Government, can provide detailed guidance on what competencies are required for various EV repair tasks. This collaborative approach would be more adaptable and would encourage continuous improvement as technology evolves.

We submit that the current RIS does not adequately demonstrate the need for such regulation, nor does it provide confidence that the benefits would outweigh the significant costs and disruptions likely to ensue. A recalibration of approach is needed. One that is guided by evidence, proportional to the risks, and developed in genuine partnership with the industry stakeholders who will be critical to its success. We provide more detailed commentary around our concerns and the preferred regulatory approach in **Attachment A** below.

The Insurance Council is committed to the shared goals of improving vehicle safety, supporting the transition to new automotive technologies, and protecting consumers. We fully agree that as the vehicle fleet modernises (with more electric, hybrid, and advanced technology vehicles on the road), ensuring the competency of those who repair and service these vehicles is essential. Our contention is not with the objective, but with the method: we believe a collaborative, flexible framework coupled with support for industry will achieve these ends more effectively than the prescriptive measures currently proposed.

We appreciate the consideration of our submission and welcome the opportunity for further dialogue – please contact Sam Xu (<u>sxu@insurancecouncil.com.au</u>) if you have any questions about this submission.

Yours Sincerely

Andrew Hall Executive Director and CEO



Attachment A – Detailed Feedback to Motor Dealers and Repairers Regulation 2025 Regulatory Impact Statement

Lack of Evidence for the Proposed EV Repair Licensing

A fundamental concern is that the RIS does not present any empirical evidence of a safety or quality problem in EV repairs that would justifying introducing a standalone licencing category and mandatory training for EV technicians. In the absence of such evidence, it is difficult to justify why a prescriptive regulatory regime is the preferred intervention.

Absence of documented safety incidents

The Insurance Council is not aware of any significant number of safety incidents, accidents, or repair failures involving electric vehicles in NSW (or elsewhere in Australia) attributable to inadequate technician skills or qualifications. The RIS document does not cite any statistics, case studies, or research demonstrating a pattern of consumer harm or systemic risk specific to EV maintenance or repair under the current regulatory settings.

Moreover, the NSW Productivity Commission and other expert bodies have consistently advised that new regulations, especially occupational licensing requirements, should only be introduced to address clear, substantiated risks or market failures. Regulatory measures should be backed by data and problem analysis, not anecdote or speculative concern.⁵ For example, IPART's best-practice licensing framework emphasises that mandatory qualifications or licences should be imposed only if there is a proven problem (such as demonstrable harm) that less intrusive measures cannot address. ⁶

Regulation driven by precaution rather than data and evidence

The RIS's justification for the Battery Electric Vehicle (BEV) repair class appears to rely largely on a precautionary principle – an assumption that because EV technology is high-voltage, new, special regulation is automatically required. The Insurance Council submits that this assumption should be tested against real-world experience and evidence.

We note that EVs have been present in the Australian market for several years and hybrid electric vehicles, which arguably carry the same degree of exposure to high voltage systems, have been in existence for decades. The Department has failed to provide any data on safety or consumer issues attributable to a lack of standalone licencing for EV repairs.

⁵ NSW Productivity Commission. 2024. Better occupational entry regulations: Policy implications of new research.

⁶ <u>PwC for the Independent Pricing and Regulatory Tribunal. 2013. A best practice approach to designing and reviewing licensing schemes</u> <u>Guidance material</u>



Existing work health and consumer protections already cover EV repairs

All repairers are already subject to work health and safety regulations which mandate safe work practices (including managing electrical risks), and to consumer laws that require services to be rendered with due care and skill. To date, these general frameworks, combined with voluntary upskilling and manufacturer guidelines, appear to have effectively managed the risks. The RIS does not present evidence to demonstrate otherwise.

NSW, and Australia more broadly, already have robust mechanisms to ensure safety and quality in vehicle repairs. As identified by the Department's own consultation paper on the matter:

"...employers in NSW are already required under Work, Health, and Safety (WHS) legislation to ensure that a person undertaking work is competent to perform the work, and has been provided with the necessary training, tools and equipment to ensure the job is completed safely.

Additionally, motor repairers are also obliged to comply with the Australian Consumer Law (ACL), which provides consumers with guarantees, including that services are provide with due care and skill and that goods are of acceptable quality. In addition to the protections in the ACL, section 113 of the Act allows for the Secretary to issue rectification orders to address incomplete or defective repair work."⁷

In addition to the protections against unsafe or poor vehicle repairs within WHS legislation and the ACL, it should also be noted that:

- Australian Design Rule 109/00 serves to ensure that EVs being imported to Australia to comply with technical design requirements to minimise risks posed by high voltage systems.⁸
- The General Insurance Code of Practice requires motor insurers (who oversee the majority of Australia's vehicle repairs) to provide lifetime guarantees on the quality of workmanship for repairs.⁹ This provides a strong incentive for insurers to ensure work performed under an insurance claim is of high quality to minimise the risk of rectification, which in turn encourages them to engage only tradespeople who are competent and skilled.

Given the protections already in place, we seriously question what benefits of imposing mandatory licensing requirements on individual technicians as proposed would actually deliver.

Missing risk assessment and quantification

No risk analysis is provided in the RIS detailing what specific harm the proposed training/licensing requirement seeks to address. For instance, there is no analysis of the likelihood and consequence of EV battery fire, electric shock, or vehicle malfunction – nor any baseline data on incidents of this nature. The Department has also not presented any evidence to show that mandatory licensing would actually improve repair quality outcomes.

Indeed, insurer repair rectification data (i.e. the proportion of repaired vehicles sent back for rework) paints the opposite picture on the effectiveness of motor repair licensing. Insurance Council members authorise over 1.5 million repairs each year across every state and territory which enables a statistically significant comparison of repair outcomes in jurisdictions that require repair licensing and

⁷ NSW Department of Fair Trading. 2025. Proposed changes to repair classes and qualifications Remake of the Motor Vehicle Dealers and Repairers Regulation 2014.

⁸ Explanatory Statement - Australian Design Rule 109 00 - Electric Power Train Safety Requirements.pdf (infrastructure.gov.au) ⁹ Code of Practice (COP) - Insurance Council of Australia



jurisdictions that don't. Insurer rectification data shows no difference in rework rates between jurisdictions that requires motor repair licensing and those that do not.

Table 1 below shows that Victoria, the Northern Territory, South Australia and Tasmania (jurisdictions which do not require licensing for motor repairs) record lower rework rates than New South Wales/ACT and WA, where licensing is mandatory. To put another way, jurisdictions that do not require mandatory repair licensing appear to, on average, have better repair quality than jurisdictions that do.

While the dataset has limits – it covers all repairs as opposed to just EV repairs and only captures insurer-authorised jobs – it does serve to cast doubt on the common claim that licensing lifts repair quality or consumer outcomes.

Table 1 Vehicle repair quality as measured by rectification rates

Source: Insurance Council of Australia 2025

State / Territory	Rectification as % of total insurance assessments	Occupational licensing required to perform motor vehicle repairs?
TAS	0.04 %	No
NT	0.14 %	No
VIC	0.28 %	No
SA	0.28 %	No
NSW / ACT	0.33 %	Yes
WA	0.57 %	Yes
QLD	0.69 %	No

We urge the Department to conduct and publish a proper risk assessment to identify the hazards associated with EV repairs, evaluate how current practices are managing those hazards, and only then consider if additional regulation is warranted to fill a gap. Any identified gap in safety should be clearly articulated and supported by evidence (for example, incident reports, insurer data on repair faults, or overseas experience) to justify a regulatory remedy.

Lack of Robust Cost–Benefit Analysis and Consideration of Impacts

Equally concerning is the absence of a robust cost–benefit analysis and implementation plan in the RIS. Best practice in regulatory development requires a thorough examination of the expected benefits of a proposal against its costs (to industry, consumers, and government), as well as an assessment of how the policy will be implemented in practice. The RIS, however, provides virtually no quantitative or qualitative analysis of these factors.

Uncosted training and compliance burden

The RIS does not estimate how many existing mechanics, technicians or businesses will be affected by the new BEV repair class requirement, nor the aggregate cost to upskill the workforce.



The proposed mandatory training (the specified AURSS00064 Battery Electric Vehicle Skill Set, as we understand from industry sources) is a multi-day course costing up to \$2,000 per technician.¹⁰ If every licensed motor mechanic in NSW who intends to work on EVs must complete this course, the direct compliance cost will be significant. Yet the RIS gives no indication of how many technicians would need training, what the total compliance cost to the sector would be, or how those costs compare to the expected safety benefits. This omission makes it impossible to judge the economic rationale of the proposal.

Speculative benefits without baseline evidence

As noted earlier, there is no data on EV repair incidents, so the "benefit" side of the equation (avoided accidents or improved repair outcomes) is speculative at best. Without a baseline or target outcome, the RIS cannot demonstrate that the benefits of the proposal outweigh the costs. Any regulatory cost imposition should be weighed against such a baseline – something the RIS has not done. Indeed, as referenced earlier, there is also no evidence to demonstrate that a motor repair licencing is effective in improving safety or consumer outcomes.

No consideration of training industry readiness and capacity

The proposal assumes that technicians can simply go out and obtain the new qualification, but there is no assessment on whether the training infrastructure is in place to deliver this at scale. It is unclear for example how many Registered Training Organisations in NSW currently offer the required EV skill set course, or how frequently they are offered. If thousands of technicians suddenly seek training, a bottleneck could occur, potentially leaving many unable to legally work on EVs for an extended period.

This could potentially disrupt repair services and claims handling for insured vehicles leading to significant frustration and challenges for consumers. Additionally, no mention is made of the availability of trainers with the requisite expertise, or whether additional resources (funding or incentives) will be provided to expand training delivery. Implementing a requirement without ensuring the means to comply is readily available would be poor policy design.

Lack of implementation planning and transition period

Related to our concerns on industry readiness and capacity is the concern that the RIS does not outline a clear plan for phasing in any new requirements. Key practical questions remain unanswered, including:

- When exactly would the new BEV mechanic licence class take effect?
- Is there a grace period for current workers?
- How will consumers and industry be informed?

Proper implementation planning would include a reasonable lead time (potentially several years) during which technicians can continue to work on EVs while they undertake training, and perhaps provisional arrangements such as allowing supervised practice or conditional authorisations in the interim.

The absence of any such discussion in the RIS is a significant gap.

¹⁰ <u>MTA Institute. 2025. AURSS00064 – Battery Electric Vehicle Inspection and Servicing Skill Set AURSS00037 Hybrid Electric Vehicle Inspection and Servicing Skill Set</u>



No discussion of flow-on effects

The RIS neglects to consider wider impacts on consumers and the repair market. For example, if repair times lengthen due to fewer available qualified technicians, this could increase costs for consumers, including higher insurance claim costs, which ultimately feed into motor insurance premiums. The Insurance Council's recent Motor Insurance Policy Paper shows that each additional dollar in claims adds about 11 cents to the average motor premium.¹¹ Repair expenses represent roughly 60 per cent of current claim costs, so higher repair costs will likely flow through to drivers. Motorists in New South Wales already face the highest average premiums in Australia.¹²

It could also affect the second-hand value of EVs if prospective buyers worry about maintenance difficulties, thereby indirectly slowing EV uptake –which would be contrary to NSW Government's broader policy of encouraging electrification of the vehicle fleet.¹³

In light of these deficiencies, the Insurance Council urges the Department to conduct a comprehensive impact analysis before proceeding. Stakeholders should be consulted on realistic numbers: how many technicians are likely to require upskilling, what the cumulative cost will be, and what benefits (in terms of risk reduction) can credibly be expected.

Currently, the case presented in the RIS is incomplete and unconvincing on these grounds.

Rigour of Consultation Process and Use of Survey Data

The Insurance Council appreciates that NSW Fair Trading has undertaken a consultation process as part of developing the RIS. However, we are concerned by the opaque manner in which stakeholder feedback and survey data¹⁴ are presented.

Opaque survey design and results

The Department mentions on its consultation page for feedback on motor trade qualifications and certification¹⁵, a survey of industry participants, which purports to support the introduction of standalone EV repair licensing, yet it does not publish the survey questions or the quantitative results.

This naturally raises queries around the appropriateness of the survey as an input for decision making – were the respondents predominantly consumers, dealerships, independent repairers, or training bodies, which would have different motivations for supporting stricter licensing? How qualified were they? What specific questions were asked to EV repairers and technicians? Does this align with real world safety data and consumer experience?

We urge the Department to release more information about the stakeholder feedback received – in particular, any data or case studies concerning EV repair safety – to justify the regulatory direction taken.

Perception versus demonstrated risk

Furthermore, some stakeholder comments might have been anecdotal or based on perception rather than empirical evidence. For example, if a few respondents expressed a general worry about EVs being "dangerous to work on," this should not be treated as conclusive evidence of an actual safety

¹¹ Insurance Council of Australia, 2025. Motor Insurance Policy Paper: A Roadmap for Reducing Rising Premiums

¹² ibid

¹³ NSW Government. 2021. NSW Electric Vehicle Strategy.

¹⁴ NSW Department of Fair Trading. 2025. Review of motor trades qualifications and certification.

¹⁵ ibid



gap. Regulators must distinguish between perceived risk and demonstrated risk. By not detailing the nature of the feedback, the RIS leaves the impression that policy may be driven by unverified concerns or the preferences of certain interest groups, rather than a balanced consideration of facts. This is concerning for the integrity of the policy-making process.

Importance of Proportionate Evidence-Based Regulation

It is worth reiterating the broader principle that regulation should be a last resort, deployed only where necessary and in a form commensurate with the problem at hand. This principle has been highlighted in numerous reviews of regulatory policy, including by the NSW Productivity Commission's recent work on occupational licensing¹⁶ and NSW Government's Guide to Better Regulation¹⁷ on best practice regulation. The current proposal are a significant deviation from these principles.

Best-practice tests for new regulation

According to the NSW Productivity Commission, all regulatory proposals in NSW must satisfy the Better Regulation Principles¹⁸ which specifically require:

- "The impacts of the proposal must be identified and justified through quantitative and qualitative analysis of all available data. The level of analysis should be proportionate to the significance of the proposal."¹⁹
- "Planning for implementation, compliance, enforcement and monitoring must be undertaken as part of regulatory development to improve regulatory design and avoid unnecessary compliance costs."

However, the RIS lacks meaningful analysis on fundamental aspects, such as the frequency and nature of repair issues, transition timelines for implementation, and even basic information on the number of EVs currently in NSW, These omissions highlight serious deficiencies in the RIS and raise questions about the rigour and justification of the proposed regulations.

Furthermore, the NSW Productivity Commission has observed that overly stringent occupational regulations can impose economic costs and stifle innovation without corresponding benefits, and that many existing licensing schemes lack a solid evidentiary justification.²⁰

It advocates for regulators to periodically review and justify licensing schemes to ensure they address genuine risks and are not simply perpetuating historical or anecdotal concerns. Likewise, IPART's framework for assessing licensing emphasises that governments should only introduce (or retain) a licensing requirement if there is clear evidence of a problem that cannot be addressed through other means, and ensure the stringency of requirements (such as mandatory qualifications) is proportionate to the risk being managed.²¹

¹⁶ NSW Productivity Commission. 2024. Better occupational entry regulations: Policy implications of new research.

¹⁷ NSW Treasury. 2019. NSW Government Guide to Better Regulation.

¹⁸ NSW Productivity and Equality Commission. 2025. Regulatory policy resources hub.

¹⁹ <u>NSW Treasury. 2019. Guide to Better Regulation.</u>

²⁰ NSW Productivity Commission. 2024. Better occupational entry regulations: Policy implications of new research.

²¹ <u>PwC for the Independent Pricing and Regulatory Tribunal. 2013. A best practice approach to designing and reviewing licensing schemes</u> <u>Guidance material</u>



In the context of the Motor Dealers and Repairers Regulation remake, these principles are directly applicable. The introduction of a Battery Electric Vehicle mechanic class with mandatory qualifications should be tested against questions such as:

- What specific market failure or risk (safety, consumer harm, etc.) is this intervention addressing, and is it backed by objective evidence?
- Is a licensing regime (one of the most interventionist regulatory tools) the minimum effective solution, or could lighter-touch approaches achieve the same outcome?
- Has consideration been given to the costs to industry and consumers and are those costs outweighed by the expected benefits in safety or consumer confidence?

Recommended Path Forward: Outcomes-Based, Risk-Tiered Framework

The Insurance Council recommends serious consideration be given to an alternative, outcomesfocused model for achieving the Government's safety objectives, rather than proceeding with the prescriptive licensing scheme as proposed. Key elements of this proposed approach could involve:

Making Licensed Businesses Accountable for Safe EV Repairs

Rather than licensing individual technicians for EV work, the regulatory framework should reinforce that motor vehicle repair businesses (which are already licensed under the Act) are responsible for ensuring all repair work, including on EVs, is performed safely and competently.

The business licensee would need to verify that any employee or contractor working on an EV has the appropriate skills or credentials for the task. This leverages existing accountability mechanisms – if a repairer were to use unqualified staff and unsafe practices, they would be in breach of their business licence conditions as well as existing WHS laws. This approach aligns with general Workplace Health and Safety duties (which require employers to ensure workers are trained for the tasks they do) and Australian Consumer Law (which implies services will be provided with due care and skill). It thereby avoids duplicating regulatory regimes.

Tiered Competency Requirements Based on Task Risk

A tiered framework that differentiates between high-risk and low-risk EV work and specifies appropriate competency requirements for each would provide a alternative and more flexible approach to managing potential risks without overburdening an already stretched repair industry. For instance, stringent training requirements could be targeted only at workers directly involved with high-voltage systems. Routine tasks such as painting, basic body repairs, or low-voltage electrical work might not require such extensive training, provided the BEV has been safely depowered.

Under this tiered approach, the outcome is that all tasks are performed safely by someone with training commensurate to the risk of that task. This would address the bluntness of the current proposal, which treats "diagnosing a software fault" the same as "replacing a high-voltage battery." It's neither logical nor efficient to mandate identical qualifications for such divergent activities. A tiered model ensures critical safety tasks receive the necessary regulatory attention without over-burdening routine maintenance and repair activities.

Recognise and Leverage Existing Training and Qualifications

The automotive industry has already been adapting to EV technology. Auto manufacturers, importers, and independent training organisations have developed various training courses and modules on EV maintenance and safety. Many mechanics and technicians in dealerships and larger repair chains



have undergone manufacturer-specific EV training programs. The regulatory framework should recognise these legitimate training pathways. For instance, if a mechanic has a certification from an Original Equipment Manufacturer (OEM) for EV servicing, or has completed an internal company EV safety program, that should be deemed sufficient (perhaps with some mapping to ensure it covers core safety elements) without needing duplication through a state-mandated course.

The fact that the current RIS does not contemplate recognition of prior learner or existing OEM training, insisting that only 'Australian Qualification Framework' approved courses would be eligible for recognition under the licensing regime, raises serious concerns about the risk of duplication.

Norway: Case study for flexible regulation for EV repairs

The flexible model outlined in the preceding section mirrors practice in jurisdictions with far higher EV uptake. In Norway, where electric vehicles make up more than a guarter of the fleet, technicians do not need a separate EV licence.^{22,23} This suggests that effective EV integration and upskilling can be achieved without imposing excessive regulatory burdens on repairers.

Unlike the regime proposed by NSW Fair Trading, Norwegian technicians are subject to a flexible framework whereby:

"the enterprise [responsible for conducting repair work] must have at least one technical expert who holds a relevant craft certificate or who has undergone specialised training organised by a manufacturer, importer, supplier, or course provider. The individual must also have documented at least six months of relevant practical experience. At least one technical expert with the necessary competence must be present during any work carried out at the enterprise."24

Given that Norway, a country where one in four cars is BEVs, has not found it necessary to implement EV-specific licencing requirements, it further raises the question of whether such proposed measures are truly necessary.

 ²² Norwegian Electric Vehicle Association. 2024. <u>Elbilbestand - Norsk elbilforening</u>
²³ Statens vegvesen: The Norwegian Public Roads Administration. 2022. <u>Regulations relation to Work on Vehicles The English language</u> version of the Norwegian workshop regulations

²⁴ ibid