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Subject: Review of electromagnetic compatibility (EMC) rules Consultation paper – Comments from EMC technologies

**Question 1**

Do you have any comments on our proposal to reference all the EMC harmonised standards for emission under Directive 2014/30/EU in the ACMA's EMC regulatory arrangements as indicated in Appendix A?

EN 301 489-1 should not be added to the recognized EMC standards list. EN 301 489-1 primarily focuses on the evaluation of the radio function of an EUT. Consequently, during testing, the radiocommunication transmitter of the EUT must be activated and exercised. This stands in contrast to the Radiocommunications Labelling (Electromagnetic Compatibility) Notice 2017, Section 2.6, which stipulates that the radiocommunication transmitter of the EUT must be switched off or placed in an idle state.

Furthermore, EN 301 489-1 does not address the evaluation of radiated emissions from an EUT. Since Harmonic and Flicker are also beyond the scope of ACMA, only the conducted emission requirement becomes applicable. Nevertheless, this requirement is already covered by either CISPR 32 or the generic standards 61000-6-3 and 61000-6-4 for this type of equipment. I am of the opinion that adding EN 301 489-1 will only contribute to more confusion among manufacturers and does not offer additional regulatory benefits.

Referencing EN standards could lead to more confusion, as these standards are prepared for compliance with the CE directive. Our perspective is that if there is no AS/NZ version of a standard, we should refer to the IEC version instead.

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**Question 2**

Do you have any comments on whether the ACMA's current EMC regulatory arrangements for managing EMC risks for vehicles, including electric vehicles, are effective?

As the electronic functions and complexity in motor vehicles continue to increase, we support the inclusion of immunity requirements for vehicle EMC testing.

**Question 3**

Do you have any comments on the options to exclude specified low-powered inductive power transfer devices such as wireless chargers for phones, electronic wearables, and electric toothbrushes from the definition of a high-risk device?

These devices should not be excluded from the high-risk device definition. Based on our experience, devices categorized as high risk are highly prone to non-compliance during their initial EMC tests. This is primarily attributed to a lack of EMC awareness among current Australian suppliers and, to some extent, overseas suppliers.

**Question 4**

Do you have any comments on our proposal to lower the compliance level of certain household devices from medium-risk to low-risk? Are there any other devices that we have not identified, where we should consider lowering the compliance level due to their low risk of causing interference? If so, please specify the types of devices and why their compliance level should be changed, including any common characteristics that cause these devices to pose a low risk of interference.

Household devices are becoming more complex and should remain classified as medium risk. Based on our experience, most household devices exhibit inadequate EMC control and are highly likely to cause interference.

**Question 5**

Do you have any comments on the categorisation of battery-powered devices as low-risk devices?

As mentioned in the proposal, the categorization is overly broad, and classifying battery-powered devices as low risk is no longer appropriate.