

20<sup>th</sup> December 2023

The Manager  
Infrastructure and Equipment Safeguards Section  
Australian Communications and Media Authority  
PO Box 13112 Law Courts  
Melbourne VIC 8010  
techreg@acma.gov.au

**Review of Electromagnetic Compatibility (EMC) Rules**

KAU is responding as a leading importer and distributor of Agricultural, Turf, Construction, and Power Equipment including engines and generators. Our products are non-road (off-road) and are not classified as road Vehicles.

KAU is a member of:

CMEIG (Construction and Mining Equipment Industry Group)

TMA (Tractor and Machinery Association)

ADEDA (Australian Diesel Engine Distributors Association)

All comments are in addition to those submitted on behalf of CMEIG and TMA.

Regards,



Benjamin Binns  
Engineering Manager (BMechEng)  
Kubota Australia PTY LTD

**Question 1.** We are proposing to expand the range of EMC standards that may be used by suppliers to demonstrate compliance. This is anticipated to reduce barriers to trade, compliance costs and time to market. Do you have any comments on the proposal to reference all the EMC harmonised standards for emission under Directive 2014/30/EU in the ACMA's EMC regulatory arrangements?

KAU encourages any means that can reduce barriers to trade, compliance costs and time to market. It is important that the following International Standards continue to be recognised and accepted for the relevant product type:

- CMEIG members continue to apply the following international standard to validate EMC characteristics:

*ISO 13766 (Series) - Earth-moving and building construction machinery - Electromagnetic compatibility (EMC) of machines with internal electrical power supply*

- TMA members continue to apply the following international standard to validate EMC characteristics:

*ISO 14982 (Series) – Agricultural and Forestry Machinery – Electromagnetic Compatibility*

In addition, we request that the CMEIG and TMA Code of Practice be extended to CISPR12 as this better covers Turf equipment distributed by TMA members and has been used in the past to validate Earthmoving equipment.

KAU request that ADEDA (Australian Diesel Engine Distributors Association) be added to the CMEIG and TMA Code of Practice. ADEDA represent most of the major importers and distributors of Diesel Engines in Australia, as well as a large portion of Diesel Generators. CISPR12 is the most relevant standard for these products. ADEDA will soon be renamed to APSEDA, Australian Power Solutions and Engine Distributors Association. This change is in order to better align the association to the change in industry to hybrid, electrified, and alternate fuel power systems.

- > **Question 2.** Modern vehicles are increasingly embedded with and reliant on advanced electronic and safety systems. Do you have any comments on whether the current EMC regulatory arrangements for managing EMC risks for vehicles, including electric vehicles, are effective?

KAU only operates in the space of non-road (off-highway) equipment. We believe current regulations are sufficient in this area as there has been no reported issues.

We do recognise that it is somewhat difficult with the current regulations to navigate what should be complained and what isn't required. Mechanically Injected Diesel engines are a good example. They have no electrical ignition system, the only electrical items they have are a starter motor, alternator, and glow plugs. Does this engine require EMC compliance? The risk is low but due to uncertainty we often opt to comply a product. Reducing this uncertainty will help eliminate burden of cost, compliance, and the potential to miss a product that should be tested.

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- > **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?

No, KAU do not have products in this space

- > **Question 4.** Do you have any comments on our proposal to lower the compliance level of certain household devices? 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.

Wiring and lighting (turn signal, brake light, taillight, clearance markers) on trailers and trailing implements pose a very low risk and should be exempt from EMC compliance testing and labelling. If they already are, then the in scope/ out of scope products needs to be more clearly defined and communicated.

- > **Question 5.** Do you have any comments on the categorisation of battery-powered devices as low-risk devices?

No Comment