

To whom it may concern

Lighting Council Australia welcomes the opportunity to comment on proposed changes to the ACMA's EMC arrangements.

In general, Lighting Council Australia agrees with the proposal to reduce trade barriers. Specific comments (Standard font) against the consultation questions (ITALICs, BOLD) are provided below:

- > ***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?***

Lighting Council Australia response: Lighting Council Australia agrees with the ACMA's proposal to reduce technical barriers to trade and reference EMC harmonised standards under Directive 2014/30/EU unless those standards are found to be significantly technically different and resulting in emissions and interference issues in Australia.

- > ***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?***

Lighting Council Australia response: No comment.

- > ***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?***

Lighting Council Australia response: No comment.

- > ***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.***

Lighting Council Australia response: LED lighting generally contains switch mode power supplies and are currently considered medium EMC risk. Lighting Council Australia notes that it is possible to make very cheap, low quality power supplies that do not conform with EMC standards. This has occurred in Australia with certain LED lamps. Lighting Council Australia agrees LED lighting products should be maintained as level 2 medium risk devices to reduce the possibility of low quality, sub-standard lighting products being supplied to the market.

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

Lighting Council Australia response: We agree battery powered lighting devices (i.e. devices where the batteries are removed for re-charging) should be maintained as level 1 low risk devices. We have no reason to believe that battery powered lighting products should be elevated in risk to medium risk.

Regards
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