

17 January 2024

The Manager
Infrastructure and Equipment Safeguards Section
Australian Communications and Media Authority
PO Box 13112 Law Courts
Melbourne Victoria 8010

Review of electromagnetic compatibility (EMC) rules Consultation paper NOVEMBER 2023

Dear Sir/Madam

The Consumer Electronics Suppliers Association (CESA) welcomes the opportunity to make a submission on the above Consultation Paper and is appreciative of the extension date provided by ACMA to 19th January 2024.

CESA is the premier national, industry body in Australia representing the consumer electronics industry. CESA Members encompass the majority of global suppliers of consumer electronic products to the Australian and New Zealand markets and also include major retailers of consumer electronic products.

Thus, CESA is a key stakeholder of the Australian Communications and Media Authority EMC rules and associated regulatory requirements for suppliers.

General Comments

CESA fully supports the need to provide suppliers with flexibility in achieving compliance with relevant technical requirements, while minimising the risks of electromagnetic interference.

The ACMA is correctly identifying the key potential areas of reform namely:

1. expanding the current list of industry standards that may be used to demonstrate compliance
2. assessing whether the current arrangements effectively mitigate the potential risks associated with advances in vehicles including the proliferation of electric vehicles and their associated equipment
3. amending the current categorisation of low, medium and high-risk devices to ensure our regulation accurately reflects the degree of potential harm associated with particular devices.

CESA Response to questions

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?

CESA supports harmonising Australian standards with European requirements. However, members are mindful that the proposed EMC list under Directive 2014/30/EU is extensive and may have

unnecessary or inappropriate items for Australian conditions. Members suggest that standards be added to the current list on the basis of relevance. Adopting all items listed under Directive 2014/30/EU could cause complexity and an increased possibility of inappropriate standards being adopted by suppliers or laboratories to declare compliance. CESA believes the inclusion of any

additional standards should be based upon evidence-based data and recommendations by the Standards Australia TE003 expert panel on EMC.

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?

While CESA members are not representative of EV technology, there is a recognition that the EMC regulatory arrangements for vehicles are critical to always ensure safety and proper performance. In particular, it is important that after-market items are effectively regulated. This is particularly important given the high-power levels that can be provided by electric vehicles. It is therefore important that ACMA provide regulations in this area that are carefully considered and appropriate.

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?

CESA agrees with both options to narrow the scope of high-risk devices and supports the proposal to categorise low power inductive power devices as Medium Risk. However, inductive power transfer products are becoming more common, and their power levels are increasing. So, while supporting exclusion of low powered products, it may be necessary to set an upper power limit for them. In the near future kitchen appliances such as toasters, kettles, fry pans etc will be powered via inductive power in the vicinity of 2000 Watts. These devices could cause considerable interference. The requirement to label gives the customer confidence that the product is compliant.

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?

CESA supports the proposal to categorise devices as low risk if they have a low risk of interference and would support all household goods (not just toasters and dryers) that do not operate continuously be considered for level 1. For example, items such as clothes washing machines, dishwashers, portable coffee machines/ grinders, blenders, mixers etc, should be considered. Although the review is very wide ranging, there appears to be no review of EME in the document. One member pointed out that some minor items produce far less energy than need to be of concern. An example was a radio-controlled toy in which the EME report (to EN 62479:2010 where the limit is listed as 20 mW) had a measured EIRP of only 0.24 mW, which is common for this type of product. The review notes that all transmitting devices, Bluetooth, Wi-Fi etc require EME assessment. While there are compliance level limits, Bluetooth devices could be exempt due to their short range and less interference profile.

Question 5

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

CESA has concerns that this categorisation is too broad as large battery powered devices with high capacity are becoming more common. CESA believes this may allow suppliers to assume low-risk when in fact they are medium-risk. For example, battery powered tools were probably not considered when the exemption for battery operated devices was decided and Lithium batteries such as those found in these products can deliver currents of more than 50 Amp at over 20 Volts. A device could generate considerable electromagnetic interference with such power availability.

However, care is required to ensure unnecessary regulation is not adopted. While some members do not support making battery powered devices any more than low risk, a compromise may be to simply remove the exemption or narrow the exemption to Button, Coin, AAA, AA, C, D or PP3 (9V) size batteries rather than all batteries.

Yours sincerely



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