
FCAI Response to *FCAI Response to Review of Electro- Magnetic Compatibility [EMC] rules* Consultation paper



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FCAI POSITION GENERAL POSITION ON MOTOR VEHICLE ELECTROMAGNETIC COMPATIBILITY

- FCAI is the peak industry body representing importers and distributors of light passenger and commercial vehicles and motorcycles to the Australian market. FCAI members supply approximately 99% of all new light vehicles sold into the Australian market.
- This response relates to the Department's questions on Review of electromagnetic compatibility rules consultation paper which is geared towards effective management of ACMA's regulatory arrangements for the electromagnetic compatibility (EMC) of equipment under the Radiocommunications Act 1992 (the Act).
- This response is applicable only to brands who are FCAI members and specifically to those categories of vehicle supplied to the Australian market by those brands. It does not offer any opinion on the applicability to vehicle supplied to the Australian market by non-FCAI member brands or to any other category of vehicle.
- As a general policy, FCAI supports Australia's recognition and application of, and harmonisation with, UN vehicle regulations developed under the UN World Forum for Harmonization of Vehicle Regulations Working Party 29 (WP.29) where ever and when ever appropriate and applicable to the Australian market. To this point, the consultation paper rightly points out that the pre-eminent global vehicle regulation relating to EMC is UN Regulation 10 - *Electromagnetic compatibility*¹.
- In the absence of a specific Australian Design Rule (ADR) covering motor vehicles' radio communications, and in recognition of supplier's obligations under ACMA's Radio Communications regulations, the FCAI has for some time had a code of practice in place governing how vehicles that FCAI members provide to market should operate in respect of these regulations. This Code of Practice² is regularly reviewed to ensure that it remains contemporary with global vehicle regulatory frameworks. The FCAI Code of Practice exceeds ACMA's requirements at this point in time.

¹ <https://unece.org/transport/vehicle-regulations-wp29/standards/addenda-1958-agreement-regulations-0-20>

² <https://www.fcai.com.au/index.php/news/codes-of-practice/view/publication/116>

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?

Noting that the range of products covered by EMC standards under Directive 2014/30/EU don't have any specific relevance to new vehicles provided to market by FCAI members, we have no particular objection to ACMA's proposal to reference all the proposed EMC standards.

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 noted in the consultation paper, FCAI members are required to comply with its Voluntary Code of Practice for Electromagnetic Compatibility (EMC) of Motor Vehicles which, in requiring compliance with UN Regulation 10, is generally more stringent than ACMA's current EMC regulatory arrangements.

The biggest risk that FCAI sees with the ACMA's current EMC regulatory arrangements for managing EMC risks for vehicles is the increase in importation of vehicles under the concessional pathways of the Road Vehicle Standards Act (RVSA) i.e. the Specialist and Enthusiast Vehicle Scheme (SEVS).

Given that the compliance with the Australian Design Rules, national vehicle standards administered by the Department of Transport includes no obligation on EMC regulatory arrangements, FCAI believes that this cohort of vehicles constitutes increased risk with respect to the EMC arrangements administered by ACMA.

With respect to electric vehicle chargers, FCAI doesn't have a view due to lack of knowledge on the specific EMC of chargers. In addition, FCAI is not aware of any work either domestically or internationally inquiring into the potential for cumulative emissions from multiple chargers, grouped and in close proximity to each other and is not able to share any further insight into this issue.

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 comment.

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

No comment.

Question 5

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

No comment.