



**SUBMISSION TO AUSTRALIAN COMMUNICATIONS and MEDIA
AUTHORITY**

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Proposal to change the Radiocommunications Labelling
(Electromagnetic Compatibility) Notice 2008 to remove the
requirement to label battery operated devices

Lighting Council Australia is the peak body for Australia's lighting industry. Lighting Council works closely with the Australian Government on EMC compliance for lighting products in the Australian marketplace. This necessitates close involvement with the Government, standards bodies and industry.

Lighting Council has solicited members' input on the two ACMA options. Members almost unanimously reject both options. They advise that all products requiring EMC compliance under the labelling notice should continue to be marked with no exemptions. They further advise that the alternative position is no products should be marked – that is, all or nothing, without exception.

Lighting Council Australia recommends that the existing requirements continue – that is, if a device is required to be compliant with the applicable EMC standard the supplier must complete and hold a Declaration of Conformity, a test report or TCF as applicable and mark the product. The mark provides a quick and reasonable level of assurance that the product complies.

Members advise that while the EMC risk is low for battery operated products, it is not unheard of for non-compliant product to cause EMC problems.

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Should ACMA decide to allow this exemption Lighting Council will also consider applying for an exemption on all ferromagnetic lighting control gear. This product type is recognised as being of sufficiently low risk that it was seriously debated within CISPR whether it should be exempted under CISPR 15.

Industry suggests that while ACMA has improved its processes for ensuring compliant product is available in the Australian market, an open access database of all RCM and C-tick registered users would significantly improve company and product EMC compliance.

Lighting Council Australia appreciates ACMA's approach to industry for input on this matter.

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