



SUBMISSION TO AUSTRALIAN COMMUNICATIONS AND MEDIA AUTHORITY

Proposed changes to the *Radiocommunications Labelling (Electromagnetic Compatibility) Notice 2008*

September 2009

Lighting Council Australia is the peak body for Australia's lighting industry. The Council represents manufacturers and suppliers of luminaires, lighting controls, lamps and associated technologies. Lighting Council administers an EMC Compliance Scheme for the Lighting Industry and works closely with ACMA on EMC compliance matters.

Lighting Council Australia has solicited members' input on the draft Radiocommunications Labelling (Electromagnetic Compatibility) Amendment Notice No 1 of 2009. The Council strongly supports the proposed amendment. In particular Lighting Council is pleased with the reduction in compliance costs brought about by the change in definition of low and medium risk products. We also welcome the concept of a Technical Evidence File as this will encourage our members to give more thought to each product released onto the market.

Lighting Council will continue to develop Technical Construction Files and have them signed by a Competent Body. Individual members will use Technical Evidence Files to justify the use of Lighting Council's Technical Construction Files. It should also be noted that in the area of product safety there is a strong inclination to adopt Technical Evidence Files.

Lighting Council Australia however makes the following recommendation specifically for the lighting industry.

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Lighting Council Australia proposes that the marking requirements for low risk lighting products such as magnetic ballast luminaires retain mandatory C-tick marking. We understand and accept that ACMA has endeavoured to reduce the regulatory compliance burden for manufacturers and importers by moving more products into the discretionary marking domain. However the lighting industry suppliers we represent believe that the changes the lighting market is experiencing warrant the continued use of mandatory C-tick marking. Hence we recommend supplier declarations for low risk and medium risk products. This would entail removing Item 2 from the table and adjusting other requirements.

The lighting industry is presently undergoing significant change. The trend towards electronics is continuing. The rapid introduction of new lighting technologies based on LEDs by new suppliers with little or no knowledge of the safety, energy efficiency or EMC regulatory requirements in Australia or New Zealand is a concern. Practically every working day Lighting Council Australia fields questions from prospective importers on the regulatory requirements in Australia and New Zealand for LED-based products. Lighting Council strongly supports the use of compliance marks such as the C-Tick or RCM, but we anticipate a problem with compliance activity if many lighting products do not carry these marks.

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