The Latest Information on Regulations and Certification Systems in Australia

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TOPICS

1. General Requirements for Electrical Equipment
   • ACMA regulations
   • Labelling
   • Records

2. Electrical Safety Requirements

3. EMC Labelling Notice

4. Wireless/Radio Equipment
   • ACMA Radiocomms regulation
   • ACMA Short Range Devices

5. Telecommunications Equipment
   • ACMA Telecommunications Regulations
   • Cellular Modems, PSTN devices

6. RF Human Exposure
   • ACMA EMF/EMR regulations
   • EMF/EMR & SAR Standards
Colo (Sydney) - Open Area Test Site

10 m OATS

30 m OATS

DoC & Listed Site
Kangaroos can affect measurements
Can a Kookaburra can effect measurements?
10m CISPR 16 indoor OATS Testing to 40 GHz
No snakes, spiders or bad weather.
Who is EMC Technologies?

- Independent Australian owned test house established in 1992
- NATA accredited ISO 17025 & 17020 facilities in Melbourne, Sydney, Auckland
  - EMC, Electrical Safety, EMF, SAR, Wireless
- Recognised Testing Authority (RTA) for ACMA telecoms compliance.
- ACMA Telecoms Certification Body
- ACMA EMC Competent Body
- European Notified Body for EMC Directive
- **Local Representative Service – Australia and New Zealand**
- Consulting EMC/EMR/RFI engineers - Major infrastructure projects
- FCC DoC lab, VCCI, iDT, BSMI, IC, **CCC (EMCT NZ)**
Part 1
General Requirements
Australian Government Regulator

- **Australian Communications and Media Authority (ACMA)**
  - Regulates Telecoms, Radiocomms (wireless), Broadcasting, Internet and other Media
  - Regulates EMC and EMF (called EMR or EME)
  - Does not regulate electrical safety except for Telecoms Equipment

- **State governments regulate electrical safety**
  - Electrical Regulatory Authorities Council (ERAC) consists of all state and New Zealand regulators
Electrical Safety Regulators


Welcome To ERAC

ERAC

ERAC is the council responsible for the liaison between the technical and safety electrical regulatory authorities of eight Australian States/Territories and New Zealand.
Current ACMA Regulations

• ACMA regulates supply of products in Australia
  – It is illegal to supply a product that does not comply with an applicable standard and has not been labelled in accordance with the labelling Notice.
  – It is illegal to operate non-compliant radiocoms equipment

• Equipment regulation is intended to manage risks associated with operation, and connection of end use
  – Health and safety + emergency call access
  – Interference to communications
  – Network integrity
  – Inter-operability (any-to-any) connectivity of telephone equipment

• Regulation does not concern quality or performance
  – This is managed by consumer law
1. Radiocommunications Labelling (Electromagnetic Compatibility) Notice 2008 + Amdt 1: *(the EMC Labelling Notice)*
   – Calls up ACMA Radiocommunications (Electromagnetic Compatibility) Standard 2008: *(the EMC Standard—calls up ACMA List of EMC standards)*

2. Radiocommunications Devices (Compliance Labelling) Notice 2014, *(the Radiocoms Labelling Notice)*
   – Calls up 16 applicable ACMA mandatory standards

3. Telecommunications Labelling (Customer Equipment and Customer Cabling) Notice 2015 *(the Telecoms Labelling Notice (TLN))*
   – Calls up a number of applicable ACMA standards

4. Radiocommunications (Compliance Labelling — Electromagnetic Radiation) Notice 2014 *(EMR Labelling Notice)*
   – Calls up ACMA Radiocommunications (Electromagnetic Radiation — Human Exposure) Standard 2014 *(EMR Standard)*
Definition

- **high risk device** means a device described as ‘Group 2 ISM equipment’ in AS/NZS CISPR 11:2004 (2nd Edition).
  - level 3 compliance
  - SAR Testing

- **medium risk device** means a device that is not a high risk device; nor a low risk device.
  - level 2 compliance
  - most devices are considered medium risk

- **Low risk device**
  - Level 1 compliance
  - Battery operated
Requirements: Compliance Level 1

- **Low Risk device**
- Battery operated
  - cannot operate from external power supply, only from internal batteries.
- Test report not essential but product must still comply with applicable standard.
- Keep a description of the device
- Sign a Declaration of Conformity
- Labelling is voluntary (for EMC only) but compliance records must be kept
Requirements-Compliance Level 2

- **Medium risk or high risk device**
  
  (a) a description of the device; and
  
  (b) a declaration of conformity; and
  
  (c) a test report or a TCF (EMC only); and
  
  • Accredited test report not mandatory for Medium Risk but will be requested by ACMA if compliance is questioned
  
  (d) a copy of any explanatory documentation to prevent users from operating or installing in a way that would make it non-compliant.
**Requirements: Compliance Level 3**

- **High Risk Device**
  - CIPSR11  Group 2 ISM equipment
  - **SAR** Compliance
  - the supplier must establish that the device complies with an applicable standard by:
    - obtaining an *accredited* test report from an *accredited testing body*
  - Must be labelled
Supplier’s Steps to Compliance

1. Identify the applicable labelling notice (category of equipment)
2. Identify the applicable technical standards (specified in the relevant labelling notice) and the testing requirements
3. Demonstrate product compliance, obtain test report and other documents
4. Complete a supplier’s Declaration of Conformity (DoC) and maintain compliance records.
5. Register as an ACMA supplier on National database
   - Must be Australian resident or company registered in Australia
   - Can use Local Representative company that is ACMA registered
6. Label the product with the RCM compliance mark.
Regulatory Compliance Mark (RCM)

- RCM replaced C-tick & A-tick 1st March 2016
- The RCM is a single compliance mark
- RCM is supplier indication that product complies with applicable standards and requirements
- A product that is subject to RCM labelling must not be supplied to the market without the RCM label
- Also used by suppliers to indicate compliance with mandatory state government electrical safety requirements.
  - List of subject equipment in AS/NZS 4417.2
Trans-Tasman MRA  Australia-New Zealand

- Harmonization between Australia and New Zealand commenced 2001
- RCM recognized in both countries
- Trans-Tasman EMC regulations apply to most products covered by CISPR/IEC/EN/AS/NZS emissions standards
- MRA covers electrical safety
- Covers harmonized Wireless standards: WiFi, BlueTooth, Portable transceivers
- **Does not included** Telecoms and Radiocoms
Responsibilities

- **Agent/Local Representative** of manufacturer or importer means a person who is authorised by the manufacturer or importer to act **in Australia** as an agent of the manufacturer or importer
  - Agent/Local Rep permitted for ACMA compliance
  - Agent/Local Rep **not permitted by ERAC for electrical safety registration**
    - Agent/Local Rep arrangements not permitted by ERAC for battery charger or Power Adapter registration
    - Separate agreement is required by ERAC
    - Importer may nominate a consultant as their **Authorized Representative** for ERAC compliance.
      - Done online by the Importer on the ERAC website
ACMA Requirements

- Supplier in Australia must establish ACMA compliance by:
  - a test report to the applicable standard; or
  - a Technical Construction File (TCF) for EMC only
  - Accredited (NATA/ILAC) test report not mandatory for EMC but will be requested if compliance is questioned
  - Accredited (NATA/ILAC) report is accepted as proof of compliance
  - Accredited (NATA/ILAC) report required for
    - some Wireless equipment
    - SAR testing
    - CISPR 11, Group 2 ISM devices
ACMA Arrangements

- Suppliers (in Australia) must register on the **ERAC EESS** national database under the **ACMA** Portal
  - details to be updated annually as per ERAC arrangements
  - no registration fees for **ACMA** registration purposes ie. when product not subject to electrical safety registration.

- A product that is not required to be labelled for ACMA purposes (ie. Low risk, Level 1 EMC product) is not required to meet ACMA labelling and record keeping requirements
  - May be done voluntarily

- As of March 1st 2016, ACMA Supplier Code Number for C-tick and A-tick no longer permitted
Compliance Records

- **ACMA compliance record**
  a. must be in English;
  b. may be kept in electronic form;
  c. must contain a description of a device;
  d. must contain a test report of testing to each applicable standard
  e. must contain a Declaration of Conformity (DoC)
  f. the Authorised Agent (Local Rep) of manufacturer or importer, must also keep a copy of its Local Rep/Agency Agreement.
RCM Label

- Denotes compliance with mandatory **ERAC** Safety and **ACMA** standards
  - Based on **mandatory** standards
    - AS/NZS, IEC, EN, CISPR
    - ACMA EMR standard
    - ACMA Radcoms standards
    - ACMA Telecommunications Labelling Notice
    - Mandatory Electrical Safety standards

- For declared devices, denotes compliance with ERAC safety standard and that it is ERAC Registered.

- **No immunity** requirements except in other jurisdictions - medical, aviation, automotive etc

- **Protected symbol**, must be registered as ACMA or ERAC supplier to use it.
Who Applies RCM Label?

- **If manufactured outside Australia**, the RCM mark must be applied by:
  - (a) the importer; or
  - (b) an agent of the importer; or
  - (c) a person who is authorised by the importer or agent to apply the RCM mark on behalf of the importer or agent.

  - May be the overseas manufacturer

- **Legal liability still rests with importer or supplier in Australia**
Who Signs DoC?

- Local supplier/importer
- Manufacturer in Australia
- Manufacturer overseas. (Liability still rests with importer/local supplier)
- Agent/Local Rep of overseas or local importer or manufacturer
- For ERAC, the Importer or the Importer’s consultant, must be registered as the Authorized Representative on ERAC database.
Changes to Applicable ACMA Standard

- **no retesting is required**
  - If a device was compliant and labelled before the standard was amended or replaced;
  - If a new standard becomes applicable on or after the date of manufacture or importation into Australia

- **Same standard for the market life of the product**
  - Different from CE Marking approach

- **Retest to new standard required if product is modified**
Is CE Mark acceptable?

CE ≠ RCM
Is FCC Label acceptable?

FCC ≠ RCM
Is VCCI acceptable?

Does VCCI = RCM??

≠
Enforcement

• **Compliance audit triggered by;**
  - Random selection from database
  - Receipt of written compliant
  - Products identified at retail outlets or advertising material
  - Interference to communications and broadcast services
  - Safety incident, electrocution, hazardous item
  - Competitor testing and checking

• **Compliance Records** must be available within 10 days of written request by ACMA

• ERAC has investigative powers
Request for Accredited Test Reports

- **If ACMA officer believes compliance records to be inadequate, ACMA may request supplier to:**
  - **(a)** obtain 3 or more samples of the device and have the samples tested, in Australia, by an accredited testing body **at the supplier’s expense**; and
  - **(b)** provide to ACMA certified true copies of the accredited test report for each sample showing that the device complies with the applicable standard.

- **Device is considered to comply;**
  - **(a)** if 3 or 4 samples were tested — all samples must be compliant according to the accredited test reports.
  - **(b)** if more than 4 samples were tested — at least 80% of the samples tested must be compliant according to the test reports.
Penalties

• Prohibition of supply
• Seizure and forfeiture of stock or compulsory recall
• On the spot fines
• Prosecution
• Embarrassment & bad publicity
• Imprisonment  (extreme embarrassment!!)
Examples of Penalties - ACMA

- **Supply of Non-standard equipment**
  - Individual: $13,000
  - Corporate: $160,000

- **False Statement:**
  - Individual: $11,000
  - Corporate: $55,000

- **Sale without label, label without compliance**
  - Individual: $11,000
  - Corporate: $55,000

- **Knowingly causing interference**
  - 12 months jail + fines
Penalties – CONSUMER LAW

- A supplier who fails to comply with a ban may be found guilty of a criminal offence.
- The maximum fine is $220,000 for an individual or $1.1 million for a corporation; AU$ = 85¥
- Civil penalties for the same amounts also apply.
Part 2
Safety Regulations
Australia & New Zealand
Safety Regulators

6 State, 2 Territory and New Zealand

Northern Territory
Queensland
New South Wales
South Australia
Western Australia
Australian Capital Territory

Victoria
Tasmania
New Zealand
ERAC is the council responsible for the liaison between the technical and safety electrical regulatory authorities of eight Australian States/Territories and New Zealand.
Mandatory Electrical Safety Scope

“Prescribed Items” also known as “Declared Articles”

- Items/Articles listed in AS/NZS 4417.2
- Mandatory accredited testing and report
- Testing must be performed by NATA (or ILAC) accredited test laboratory; A2LA, JAB, DAkkS (DKD), +
- Must be certified by accredited certification Body who issues a “Certificate Of Conformity”
  - a sample may be requested
  - application fees are charged
- Product details and certificates must be registered on ERAC Data Base, fees apply
- IECEE (CB) reports acceptable with Australian differences
List of Prescribed/Declared Items

- Listed in AS/NZS 4417.2
  - Consumer devices
  - Domestic appliances
  - TV Receivers
  - **Battery Chargers**
  - Transformers
  - **Power Adapters**
  - Electronic ballasts
  - etc

- For a current list, go to:

Electrical Safety - Out of Scope Equipment

- “Non-Prescribed Items”
  - all other items of electrical equipment that are not listed as Declared/Prescribed articles
    - Commercial, industrial, scientific, wireless, ITE etc
  - Accredited testing not mandatory
  - Certification and ERAC registration is voluntary
  - Consumer, competition and OH&S laws require safety compliance
  - Must still meet minimum safety standards
  - Australian “difference testing” is common
  - Must also meet ACMA requirements before RCM is applied
Safety Compliance - Labelling Requirements

- **Prescribed Items:**  
  - Supplier must be registered with **ACMA and ERAC** as the Responsible Supplier  
  - RCM label after Item is registered on ERAC Data base.

- **Non-prescribed Item:**  
  - Suppliers must be registered with ACMA as the Responsible Supplier  
  - not necessary to register with ERAC

- **RCM Label**  
  - Minimum of 3mm height, durable; not easily removed;  
  - Placed on an external surface (or one easily accessible to the user).
Part 3
EMC Regulations
Australia & New Zealand
The ACMA EMC Labelling Notice

The ACMA Radiocommunications Labelling (Electromagnetic Compatibility) Notice 2008 + Amdt 1: *(the EMC Labelling Notice)*

Specifies equipment supplier’s obligations for:

- Testing to ACMA applicable standard
- Keeping compliance records
- Labelling
ACMA List of Applicable EMC Standards

- Includes most standards that are on the EU OJ list of CE Marking EMC standards
  - Emission aspects of EN standards, immunity not required


- Includes AS/NZS CISPR 11, 12, 13, 14-1, 15, 22, 32
- EN Versions also included

- CISPR 25 not mandatory
  - Automotive aftermarket devices generally tested to CISPR 22
Exemptions - EMC Compliance only

- Other jurisdictions (medical, automotive etc)
- Prototypes
- Military/defence/approved foreign defence equipment
- Device where power consumption < 1 mW
- **Battery operated devices** (Note definition)
- Research/educational; study of EMC
- Spare part
  - Identical specifications and RF emissions
- Component
- A device not for end use intended for direct supply to manufacturer
- Exhibition/demonstration
- Fixed installation
  - But note that the Radiocommunications Act prohibits interference to communications.
- Power supply >600 VAC or >1000 VDC
- Vehicles, tractors and machinery approved under industry voluntary codes
  - Must comply with NB and BB standards per voluntary codes of practice
- Various law enforcement agencies.
- Personal computers assembled **in Australia** from individually compliant component
  - Components must each be C-ticked
END OF PART 1
Part 4
Radiocommunications
Radio-Wireless Transmitters

Radiocommunications Devices (Compliance Labelling) Notice 2014 (the Radiocomms Labelling Notice)

- Applies to all wireless devices except cellular and broadcasting
- Has 15 applicable ACMA mandatory standards for different types of transmitters
  - ACMA standards generally similar to ETSI/EN standards
  - Frequency/spectrum plan may sometimes differ
  - No licence required, no submittal to ACMA, no ACMA fees
  - DoC, compliance records and RCM label required

- Contains 8 Australia-New Zealand harmonised standards
  - RCM valid in AU and NZ where standards are harmonised
ACMA Mandatory Radiocomms Standards


Calls up 15 Applicable standards including

- Short Range Devices (WiFi, BT, etc)
- PTT transceivers
- Mobile transceivers
- Marine transceivers
- Emergency beacons
- DECT
- etc.
Radiocomms Compliance

- Low, Medium and High risk categories
- Same requirements as for EMC Labelling Notice

  - **Level 1: Description & DoC**
    - Test report not mandatory but must comply
    - Labelling mandatory
  
  - **Level 2: Description, DoC & “evidence” of compliance**
    - May be a test report, unaccredited acceptable
    - FCC or ETSI reports acceptable if Australian requirements met

  - **Level 3: Description, DoC & accredited report**
    - Accredited FCC/ETSI report to Australian requirements is acceptable
    - SAR Reports are always Level 3 and must be accredited
Short Range Devices
Short Range Devices (1)

- Short range devices operate under **class licence** conditions listed in:
  "Radiocommunications (Low Interference Potential Devices) Class Licence 2015"

  - prescribes standards, and may specify other technical and operational parameters.
  - No applications, no certifications, no registrations or ACMA fees

- **802.11a,b,g,n & BlueTooth** must comply with "**ACMA Radiocommunications (Short Range Devices) Standard 2014**"

- Must not cause interference and is not afforded protection from interference

- **Radiocommunications (Electromagnetic Radiation- Human Exposure) Standard 2014** (applies to all RF transmitters)
  - SAR or AS/NZS 2772.2
Short Range Devices (2)

To operate under the class licence the device must comply with AS/NZS 4268

The following standards in part or in full:

- AS/NZS 4268
- ETSI/EN 300 220-1
- ETSI/EN 300 328
- ETSI/EN 300 330
- ETSI/EN 300 440
- ETSI/EN 301 893 (5600-5650 MHz prohibited)
- ETSI/EN 302 288-1

- FCC part 15.247 reports
  - Gap testing may be required to meet AS/NZS 4268
## Radiocommunications (Low Interference Potential Devices) Class Licence 2015

### Example

<table>
<thead>
<tr>
<th>Item</th>
<th>Class of transmitter</th>
<th>Permitted operating frequency band (MHz)</th>
<th>Maximum EIRP</th>
<th>Limitations</th>
</tr>
</thead>
<tbody>
<tr>
<td>52</td>
<td>Frequency hopping transmitters</td>
<td>915-928</td>
<td>1 W</td>
<td>A minimum of 20 hopping frequencies must be used</td>
</tr>
<tr>
<td>53</td>
<td>Frequency hopping transmitters</td>
<td>2400-2483.5</td>
<td>500 mW</td>
<td>A minimum of 15 hopping frequencies must be used</td>
</tr>
<tr>
<td>54</td>
<td>Frequency hopping transmitters</td>
<td>5725-5850</td>
<td>4 W</td>
<td>A minimum of 75 hopping frequencies must be used</td>
</tr>
</tbody>
</table>
# Radiocommunications (Low Interference Potential Devices) Class Licence 2015

## Example

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</thead>
</table>
| 44   | Radio Local Area Network transmitters used indoors (RLAN) | 5150-5250 | 200 mW (averaged over the entire transmission burst) | 1. If the emission bandwidth is 1 MHz or greater, the radiated power spectral density in any 1 MHz is limited to 10 mW per MHz.  
2. If the emission bandwidth is less than 1 MHz, the radiated power spectral density in any 4 kHz is limited to 40 µW per 4 kHz. |
## Radiocommunications (Low Interference Potential Devices) Class Licence 2015

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<tbody>
<tr>
<td>44A</td>
<td>RALN transmitters used indoors</td>
<td>5250-5350</td>
<td>200 mW (averaged over the entire transmission burst)</td>
<td>1. If the emission bandwidth is 1 MHz or greater, the spectral density in any 1 MHz is limited to 10 mW EIRP per MHz&lt;br&gt;2. If the emission bandwidth is less than 1 MHz, the spectral density in any 4 kHz is limited to 40µW EIRP per 4 kHz&lt;br&gt;3. From 1 January 2006 devices operated for the first time must use Dynamic Frequency Selection (DFS) and Transmit Power Control (TPC). If TPC is not used then the maximum EIRP is limited to 100mW</td>
</tr>
</tbody>
</table>

**5600 -5650 MHz range not permitted in Australia**
Radiocommunications (Low Interference Potential Devices) Class Licence 2015

Example

<table>
<thead>
<tr>
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<th>Class of transmitter</th>
<th>Permitted operating frequency band (MHz)</th>
<th>Maximum EIRP</th>
<th>Limitations</th>
</tr>
</thead>
</table>
| 45   | Digital modulation transmitters | 915-928 | 1 W | 1. The radiated peak power spectral density in any 3 kHz is limited to 25 mW per 3 kHz  
2. The minimum 6 dB bandwidth must be at least 500 kHz |

902-915 MHz range not permitted in Australia
Part 5
Telecommunications Approval Requirements for Australia
Telecommunications (Labelling Notice for Customer Equipment and Customer Cabling) Instrument 2015


• Known as the Telecoms Labelling Notice (TLN)
• Includes :
  – Security Systems/modems/GPS Trackers with PSTN, GSM, GPRS, 3G, 4G or other telecommunications interfaces
  – Mobile Phones
  – Cordless Phones
  – PSTN Telephones
  – VOIP devices
  – Also
    • Fax Machines, Modems (including ADSL Modems)
    • PABX’s, System Integral Phones
    • Some Transmission Equipment
2G/3G/4G Cellular Devices

  - Requirements for connection to air interface
- **AS/ACIF S042.3:2005** (2G, GPRS)
  - Requirements for GSM Equipment
  - Requirements for IMT-2000 and LTE Equipment
- **Certification Body Statement (Certificate)**
  - based on documentation review
- **Safety to AS/NZS 60950** applies to all the above
  - NATA/ILAC accredited testing required for Safety
  - Test lab must be on NATA list for AS/NZS 60950:2011
Other Requirements

• EMC
  – Charger, Accessories, Car Kits

• Human Exposure to RF
  – EMR, SAR
  – Body Worn SAR applicable for Hands Free Kit

• Safety
  – Power adapters/Chargers, Handset
Part 6
EMR-EMF-SAR Testing & Approval Requirements for Australia

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EMR/EMF Regulations

The Radiocommunications (Compliance Labelling– Electromagnetic Radiation) Notice 2014

- Known as the EMR Labeling Notice
- Same requirements as for EMC
  - Register as ACMA supplier to use RCM
  - Record keeping, supporting documentation
  - Testing and report requirements
  - Laboratory accreditation
  - Compliance levels
  - Labelling requirements
  - Declaration of Conformity (DoC)
EMR/EMF Regulations

• The **Radiocommunications (Electromagnetic Radiation - Human Exposure) Standard 2014**

Radiocommunications (Electromagnetic Radiation — Human Exposure) Standard 2014

• Known as the ACMA EMR Standard
  – “Standard” sets limits for human exposure to EMR from mobile/portable Radiocommunications Transmitters that have an integral antenna
  – Created by Australian Communications and Media Authority (ACMA)
  – Specifies ARPANSA (ICNIRP) Limits
  – 2 measurement methods (Field meter or SAR method)
  – Allows assessment by computation (FCC MPE)
<table>
<thead>
<tr>
<th>User Position</th>
<th>Applicable Frequency Range</th>
<th>ACMA Evaluation Method</th>
</tr>
</thead>
<tbody>
<tr>
<td>&gt; 20 cm from Human Body</td>
<td>300 kHz to 100 GHz</td>
<td>Power density or Field Strength Reference Level measurements - EMR Meter AS/NZS2772.2</td>
</tr>
<tr>
<td>&lt; 20 cm from Human Body</td>
<td>150 MHz – 5800 MHz</td>
<td>SAR measurements Push-to-Talk/BodyWorn devices - SAR per EN62209-2</td>
</tr>
<tr>
<td>Close Proximity to Human Ear</td>
<td>300 MHz – 3000 MHz</td>
<td>SAR Measurements at the ear Mobile/Portable Phones - SAR per EN62209-1</td>
</tr>
<tr>
<td>&lt; 2.5 cm from Human Body</td>
<td>300 kHz-100 GHz</td>
<td>If less than 20 mW, - complies, testing not required</td>
</tr>
</tbody>
</table>
What Needs SAR Testing?
EMR/SAR Measurement Methods

ACMA EMR Standard 2014

- **Ear position - SAR**
  - EN62209-1
  - FCC Reports not acceptable

- **Body Worn Position – SAR**
  - EN62209-2
  - FCC Reports not acceptable

- **Devices >20cm from body**
  - EMR field strength meter, power density, reference levels
  - AS/NZS 2772.2:2011
    - Computation method allowed
    - Direct measurement
Labelling-Compliance Records

The Radiocommunications (Compliance Labelling-Electromagnetic Radiation) Notice 2014

- **Labelling requirements same as for RCM**
  - Register as ACMA supplier on ERAC database
  - Prepare SAR test report (+other test reports)
    - SAR Test Lab must be NATA/ILAC accredited for SAR testing
  - Prepare Description of device
  - Prepare Compliance Folder
  - Declaration of Conformity
  - Apply RCM
  - No need to report actual SAR in user information.
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