

REGULATORY COMPLIANCE MARK

LIGHT TECHNICAL BRIEF



The Regulatory Compliance Mark (RCM) is used in Australia by electrical and electronic equipment importers and manufacturers (responsible suppliers) as a visible assertion that products meet the Australian electrical safety and electromagnetic compatibility regulations.

The RCM is a trademark owned by Australian and New Zealand Regulators including the Australian Communications and Media Authority, New Zealand Radio Spectrum Management (RSM), and Australian and New Zealand electrical safety regulators.

Use of the RCM is detailed in the AS/NZS 4417 series of standards and the *Equipment Safety Rules*. Suppliers are advised to familiarise themselves with all relevant Acts, regulations and standards.

Before marking products with the RCM, all suppliers must be registered through the Electrical Regulatory Authorities Council Electrical Equipment Safety System (ERAC EESS) to use the RCM.

Users of the RCM must comply with two regulatory regimes: Electrical safety (Regulated by state electrical safety regulators); and Electromagnetic compatibility (regulated by the ACMA). The requirements for both areas are outlined below.

Electrical Safety - RCM marking requirements

1. The ERAC EESS requires all *in-scope*¹ electrical and electronic equipment to be marked with the RCM before being placed onto the market.
2. From 1 March 2018, *in-scope* electrical equipment at any point in the supply chain must have the RCM marking.
3. Suppliers of *in-scope* electrical equipment must be registered² before using the RCM and must make a declaration that their *in-scope* equipment (products) meet all requirements of relevant regulations and standards.
4. Certificate of Conformity: *In-scope* electrical products that are level 3 (i.e. considered high risk) are required to have a Certificate of Conformity that demonstrates the product is compliant with the relevant standards, as tested by a recognised laboratory (see list below).

¹ *In-scope* equipment is defined as low voltage (i.e. 50Va.c. - 1000V a.c., or 120V d.c. - 1500V d.c.) electrical and electronic equipment that is designed or marketed as suitable for household, personal or similar use regardless of whether the equipment is also designed and marketed to be used for commercial or industrial purposes.

² Registration website: Register at <https://equipment.erac.gov.au/Registration/Default.aspx>

- Level 2 (medium risk) and Level 3 (high risk) electrical and electronic equipment must be registered on the ERAC EESS prior to being offered for sale in Australia.

Note: Products that are certified by NSW Fair Trading or a third-party certifier recognised under the Recognised External Approvers Scheme (REAS) must additionally mark products with the certificate approval number issued by those authorities. Certificate numbers can be in the following formats: N11, N10422, NSW1234, A/10234/EA, SAI SMK EA 10578, SAA10156EA, SGSEA10345, AGA 11024EA, QAS:TE1234 or SAI:TE1234.

Products that are certified under the ERAC EESS do not need to be additionally marked with the certificate approval number.

How to Verify

The [national register](#)³ can be searched to verify product certificates and responsible supplier registration. Product searches can be performed by equipment details (including brand and model name) or by certificate number.

Product Risk Levels

Definitions and risk levels for in-scope electrical equipment are listed in AS/NZS 4417.2.

Example level 3 (i.e. high risk) electrical equipment is listed below:

- Decorative lighting outfits
- Fluorescent lamp starter
- Inspection handlamp
- Luminaire portable type (simple portable luminaires will become level 2 on 1 June 2018)
- Lighting power supply
- LED lamps (level 3 from 30 June 2018)
- Therapeutic lamp, soon to be re-named as 'beauty care lamp' (will be reduced to level 1 from 30 June 2018)
- Double capped light emitting semiconductor lamp
- LED tube
- Bayonet lampholder
- Bayonet lampholder adaptor
- Edison screw lampholder
- Fluorescent lamp ballast
- Night light (level 3 from 30 June 2018)

Example level 2 (medium risk) electrical equipment is listed below:

- Simple portable luminaires (level 2 from 1 June 2018)

³ <https://equipment.erac.gov.au/Registration/Default.aspx>

Electromagnetic Compatibility – RCM marking requirements

Electrical and electronic equipment electromagnetic compatibility (EMC) is administered by the Australian Communications and Media Authority (ACMA). The ACMA requires suppliers of electrical equipment to be registered⁴ and be able to demonstrate EMC compliance through the provision of test reports.

From 1 March 2016, the RCM has been required to be marked on all newly manufactured in-scope electrical products under EMC requirements. Stock that was manufactured and marked prior to 1 March 2016 with the superseded C-tick or A-tick mark may still be sold through the supply chain indefinitely.

Products are categorised into three risk levels (see below for a summary). The marking of level 1 (low risk) equipment with the RCM is voluntary. The marking of level 2 and level 3 equipment with the RCM is mandatory.

The risk levels and example equipment are summarised below:

1. Level 1 (low risk): Battery powered devices that do not have the capability of being connected to an external power supply (e.g. LED torch); or products that only incorporate resistive elements (e.g. incandescent lamps).
2. Level 2 (medium risk): a switch mode power supply; a transistor switching circuit; a microprocessor; an electronic device operating in a switching or non-linear mode. (e.g. LED drivers, LED self-ballasted lamps, LED tubes, T8/T5 adaptors, electronic ballasts and luminaires containing the above medium risk products).
3. Level 3 (high risk): Equipment that intentionally generates electromagnetic radiation. (e.g. microwave lighting apparatus).

Conformance documentation to be maintained by equipment suppliers

The following can be requested by ACMA from a supplier to verify the legitimacy of product EMC:

- A test report or technical construction file showing the device complies with an applicable technical standard. For level 1 (voluntary) and level 2 equipment, the test report can be an in-house produced test report. For level 3 (high risk) equipment, a test report from an accredited laboratory is required.
- A declaration of conformity.

Search the [national register](#)⁴ for supplier registration.

⁴ Registration website: <https://equipment.erac.gov.au/Registration/Default.aspx>

Where to find the RCM Mark

The RCM could potentially be found in one of three places:

1. Surface Label – in a contrasting colour or by relief with moulding or engraving.
2. Electronic Label – on a built-in display, available during device start-up, or in the devices menu.
3. Package Label – if it is not practical to display the RCM on the product, the RCM must be found on both the external surface of the packaging and in the documentation which accompanies the product.

Reporting Non-Compliant Product

Lighting Council Australia will investigate any non-compliant products from member companies. Reports can be sent to ceo@lightingcouncil.com.au with a list of member companies available [online](#)⁵. For non-member companies, contact the relevant [state regulator](#)⁶ so that action can be taken against the supplier. Product recalls, infringement notices and prosecution are all possible outcomes depending on severity of the breach.

⁵ <http://lightingcouncil.com.au/site/members.php>

⁶ http://www.doesitcomply.com.au/what_should_you_do/state_regulator_contacts

