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The Manager

Infrastructure and Equipment Safeguards Section

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By email: techreg@acma.gov.au

Subject: Submission on Proposal to remake the sunseting Telecommunications (Labelling Notice for Customer Equipment and Customer Cabling) Instrument 2015 and 8 telecommunications standards

Apple appreciates the opportunity to provide comments via the public consultation— Proposal to remake the sunseting Telecommunications (Labelling Notice for Customer Equipment and Customer Cabling) Instrument 2015 and 8 telecommunications standards (hereon as 'Proposal').

The draft Proposal appears to be intended to instruct users for a method to display the label, as part of the requirement around electronic labelling of consumer equipment. Division 3, article 14, subsection (2),states:

(2) The manufacturer or importer must ensure that the documentation that accompanies the item when supplied sets out a method for displaying the label.



Apple proposes that the mentioned documentation could either be a physical document accompanying the item in the packaging, or be online documentation. We'd suggest the inclusion of a QR code — directing a consumer to online documentation — could be one method of complying with this requirement.

There are many benefits to allowing online documents, such as the reduction of paper consumption and printing efforts. It provides an environment-friendly solution for suppliers in the Australian market, reduces waste, and supports the Government's circular economy agenda. Australian consumers are also very familiar and comfortable with QR codes and accessing online documentation for products, and so there is unlikely to be any impact on consumers' ability to access information contained in the documentation.

Apple would be very happy to discuss further.

Sincerely yours,



APAC Regulatory Compliance Manager