



AMTA response to –
Updating the spectrum licence tax – we want to update the total annual EME component of spectrum licence tax payable

Submitted via the ACMA's website

21 August 2025

Dear Sir/Madam,

The Australian Mobile Telecommunications Association (AMTA) welcomes the opportunity to provide this submission in response to the consultation paper: *Updating the spectrum licence tax – we need to update the total annual EME Component payable in 2025-26* ("the consultation paper").

The AMTA is the peak industry body of Australia's mobile telecommunications industry. Our purpose is to be the trusted voice of industry, promoting the adoption, monetisation and sustainability of mobile telecommunications technology for the benefit of all Australians. AMTA's members include the mobile network service providers, handset manufacturers, network equipment suppliers, retail outlets and other suppliers to the industry.

While AMTA supports the work that should be funded by the spectrum tax total annual EME Component, we have two specific concerns which relate to the need to increase the annual amount; and the outcomes for industry, consumers and the economy being generated by the utilisation of the funds.

The EME component was introduced at a time when it was identified that "carriers commercial deployments of new and emerging technologies are causing the need for Government to respond to community concerns about 5G and EME".¹ The EME component is used to fund the Government's EME Program, which provides for research international engagement and public information concerning EME from telecommunications facilities.²

AMTA recognises that the EME Component of the spectrum licence tax funds the Government's EME program which is split across the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA), and the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts (the department).

AMTA would like to acknowledge the significant roles that the scientists at ARPANSA play in their participation in the WHO Systematic Review on the health effects of RF on people and the environment and are eagerly awaiting outcome of these reviews. We also acknowledge the role in setting and updating RF exposure standards in Australia and their body of research. The ARPANSA 'Talk to a Scientist' service is a great resource for those in the community that have concerns around the impact of radiation from mobile and other applications such as broadcast and WiFi.

AMTA also recognises the important resources that the department has been producing which includes contributions by AMTA members. The recent videos featuring Dr Karl Kruszelnicki explain what EME is and talks to the myths that activists and concerned citizens have in relation to mobile technology are compelling and insightful. In the last 12 months they have also produced several fact sheets and conducted webinars targeting local Government officers and councillors.

Given the significance of the EME component of the spectrum licence tax, AMTA once again calls for greater transparency on the amount of EME tax being allocated to ARPANSA and the department, and whether the full

¹ Explanatory Statement to the ACMA (Modifications to Apparatus and Spectrum Licence Taxes) Direction 2020

² Explanatory Statement to the ACMA (Modifications to Apparatus and Spectrum Licence Taxes) Direction 2020

amount is being allocated for the purpose it was collected. In our response the ACMA's 2024 consultation, AMTA sought greater transparency around the allocation of these funds and whether all funds were being allocated for the purpose they are collected. Unfortunately, the 2025 consultation paper does not adequately address this request and provides no greater transparency around the allocation of this significant tax. Additionally, the consultation paper neglects to confirm whether all the funds are allocated to the purpose for which they were raised. The telecommunications sector has seen declining returns on invested capital with numerous taxes placed on it. As an industry we seek to understand how Government is using the funds it is collecting from the sector in a transparent manner.

AMTA notes that we have much more transparency over how our individual income taxes, or our council rates, are allocated then we do to how this specific purpose tax is being allocated.

AMTA would expect that any CPI increases would be passed to the recipients of the EME Program, i.e., ARPANSA and the Department to ensure they continue to be adequately funded in the important work they undertake.

Transparency of allocation and accountability for reporting on outcomes

Once again, AMTA requests that the ACMA provide an annual report on the actual amounts allocated within the EME Component and to what part and institution, or body, they were allocated. Also, for a report showing the incremental outcomes produced in the previous year. We note that this year's consultation paper pointed to a collective body of work spanning five years.

AMTA asks for a public itemised account of the allocation of the total EME tax component.

In summary, it remains unclear how all the EME tax component funds are being allocated and whether an annual adjustment indexed to CPI increases is required as there is a lack of evidence that all the funds have been allocated to the EME Program. This raises concerns and results in our continued call for transparency on the allocation of funds and reporting on how the funds were consumed and the resulting economic, social and industry benefits that have arisen. AMTA again suggest a report should accompany the ACMA's annual consultation on the EME Component that clearly:

- Itemises the allocation of funds.
- Provides reports from the previous year's beneficiaries and the outcomes they achieved.
- Provides a forecast on the outcomes to be delivered with the allocation of funds in the next year.

AMTA would also like to see a clear statement, or declaration, in the consultation paper that all the EME tax component funds have been allocated to the purpose intended.

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