

ATA response to the ACMA consultation – Updating the EME component of the spectrum licence tax
Submitted via the ACMA's website

24 August 2026

Dear Sir/Madam,

The Australian Telecommunications Alliance (ATA) welcomes the opportunity to provide this submission in response to the consultation paper: *Updating the spectrum licence tax –Electromagnetic Energy (EME) Component payable in 2026-27* ("the consultation paper").

The ATA is the peak body of the Australian telecommunications industry. We are the trusted voice at the intersection of industry, government, regulators, and consumers. Through collaboration and leadership, we shape initiatives that grow the Australian telecommunications industry, enhance connectivity for all Australians, and foster the highest standards of business behaviour. For more details, visit www.austelco.org.au. We note that the Australian Mobile Telecommunications Association (AMTA) merged with ATA on 1 July, and previous responses referred to in this submission were from AMTA.

ATA supports the work that is funded by the spectrum tax total annual EME component. The Mobile Industry is drawing closer to implementing the next generation of mobile technology, 6G, with trials commencing in 2029 and widespread commercial launch in 2030. The need to ensure that the community is well informed and that disinformation and misinformation is well managed, needs to start to ramp up.

The need for this funding will become more important as we approach the launch of 6G, so ensuring that all the funds are allocated efficiently for the special purpose they were raised is doubly important.

Lifecycle of community concern aligned to new technology introduction

Every introduction of new technology, 3G, 4G and 5G, has seen community concern about EME increase as the new technology approaches and then decline two to three years after introduction. The below graph illustrating calls to the ARPANSA Talk to a Scientist service shows this lifecycle of concern associated with new mobile technology introduction, in this case 5G.

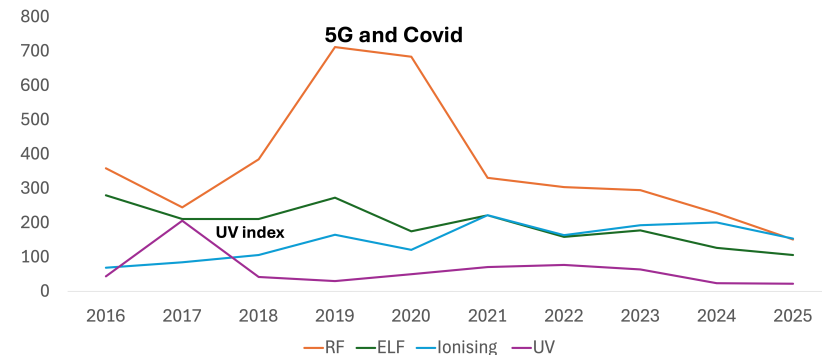


Figure 1 – Annual contact volumes to ARPANSA's Talk to a Scientist service

We note that 5G was commercially launched in May 2019, however from the graph we can see that concern started increasing in 2017 and accelerating through 2018. 5G availability coinciding with COVID 19 drove various irrational conspiracy theories which resulted in elevated peak community concern. This drove the need for an improved Government EME Program and the associated funding from industry in the form of the special purpose EME spectrum tax component.

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". 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 facilities¹.

ATA 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).

Australia considered best practice

ATA 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. These reviews have been completed, and we are eagerly awaiting outcome in the form of a Monograph. The long-awaited WHO Monograph is very likely to generate community and scientific interest on the matter which will require responses from industry and the Government's EME Program.

We acknowledge the role ARPANSA undertakes 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

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

those in the community that have concerns around the impact of radiation from mobile and other applications such as broadcast and WiFi.

ATA also recognises the important resources that the department has been producing which includes contributions by ATA members. In the last 12 months the team at the Department has:

- Made the information on EME available in multiple languages
- Provided more content from Dr Karl Kruszelnicki explaining wireless and EME in an easily understandable manner.
- Provided a new fact sheet on “EME exposure limits”
- Provided a fact sheet on “Understanding telecommunications infrastructure near your home”
- Released “Connected – A guide on how wireless technology enables connectivity in your home and community”
- Conducted further consumer research on wireless and infrastructure sentiment.

BioEM 2026

In June this year Australia hosted the international BioEM 2026 conference, organised by ARPANSA. At this conference there was an opportunity to showcase Australia’s co-ordinated management of EME. Those attending from other countries were somewhat envious of the way Australia communicates on the subject of EME:

- The mobile industry provides an ARPANSA EME Report for every mobile infrastructure site in Australia, via RFNSA.com.au. This shows the cumulative EME for all mobile infrastructure providers per site. This is globally unique, with other markets providing operator level EME exposure reports, rather than total per site basis.
- ARPANSA has taken many leadership roles in the scientific and global standards organisations, leading and participating in the WHO systematic reviews, and setting the standards that industry complies too. A presentation on ARPANSA’s Talk to a Scientist program was very well received at BioEM.
- The Department presented on their communications and consumer research program, this was well received by international visitors to the conference.
- A presentation on the ACMA’s EME Checker program was also well received. This provides the community with an independent measure of the EME from mobile infrastructure, which in over 99% of sites is only a fraction of the conservative predictions that industry provide via the RFNSA.

Australians attending BioEM came away with a sense that, as a country, in managing community concerns related to EME we are ‘best practice’. However, with 6G looming we need to be proactive and vigilant in managing community concern. ARPANSA will need to be informed and undertake research on the EME associated with 6G technologies and the new spectrum bands that will be used. The Department’s continued consumer research will provide an indication on when concern is increasing and the balance required in communicating facts, at the right level and period.

Greater transparency and reporting

ATA, previously AMTA, once again calls for greater transparency on the amount of EME tax being allocated to ARPANSA and the Department and respectfully ask that the full amount be allocated for the purpose it was collected. In our response to the ACMA’s 2024 and 2025 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 2026 consultation paper does not adequately address

this request and provides no greater transparency around the allocation of this special purpose tax. Additionally, the consultation paper neglects to confirm whether all the funds are allocated to the special purpose for which they were raised. As an industry we seek to understand how Government is using the funds it is collecting from the sector in a transparent manner.

ATA 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. We do note that Government is generally requiring productivity improvements from their regulatory agencies and Departments such that overall funding is reduced, not increased.

Once again, ATA requests that the ACMA provide an annual report on the actual amounts allocated within the EME Component and to what 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 advised the objectives and areas of concern for each beneficiary of the tax. Industry is aware broadly of the valuable work done in the last 12 months related to the Government’s EME Program, by ARPANSA and the Department, but would very much appreciate a summary report on the outcomes achieved.

ATA 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 the CPI increases 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 clear reporting on the resulting economic, social and industry benefits that have arisen. ATA 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.

This would provide industry with greater confidence that funds are being applied to their intended purpose and that expenditure continues to represent value for money.

ATA 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.

Contact

If you have any queries, or comments, in relation to the content of our submission, please contact Chris Coughlan, Head of Spectrum and Network Infrastructure, 0401 988 322, or by email c.coughlan@australco.org.au.

Yours sincerely,



Chris Coughlan
Head of Spectrum and Network Infrastructure
Australian Telecommunications Alliance (ATA)