

Australian Electrical and Electronic Manufacturers' Association  
Consumer Electronics Suppliers Association

**JOINT SUBMISSION TO  
REVIEW OF THE AUSTRALIAN GOVERNMENT'S RELATIONSHIP WITH  
STANDARDS AUSTRALIA LTD AND THE NATIONAL ASSOCIATION OF  
TESTING AUTHORITIES, AUSTRALIA**

June 2006

**INTRODUCTION**

This submission supplements a submission to the Review by the Australian Electrical and Electronic Manufacturers' Association (AEEMA).

As stated in its original submission, AEEMA represents some 400 infrastructure providers for Australia's ICT, electronics, and electrical manufacturing industries.

The Consumer Electronics Suppliers Association represents suppliers of a large range of consumer electronics equipment in Australia, including ICT, audio visual equipment and domestic appliances.

Between them, AEEMA and CESA hold XX positions on Standards Australia committees.

The purpose of this supplementary submission is not to replicate AEEMA's original submission, but rather to highlight some of the key issues for the two associations. Both associations have extensive involvement with Standards Australia through their members' participation on standards technical committees.

**MAIN ISSUES FOR AEEMA AND CESA**

*Lack of resources at committee level*

AEEMA and CESA are particularly concerned about a lack of resources within Standards Australia and the consequent negative effect on the work of technical committees. Examples include:

- Unacceptable delays in issuing minutes of meetings. In one example minutes of a meeting held nearly two years ago have yet to be issued. In another example, two consecutive meetings of a committee have taken place without minutes. In other examples, documents have been updated for meetings but no minutes issued.

- Late issue of agenda papers – on a number of occasions the day before, or even the day of, a meeting.

It is practically impossible for technical committees, frequently with large and technically complex agendas, to operate effectively in such circumstances. AEEMA and CESA have been advised by some member companies that as a consequence of these shortcomings they are seriously questioning sending representatives to standards meetings.

#### *Diversion of resources to fee paying stakeholders*

It is apparent to AEEMA and CESA that human resources within Standards Australia have been diverted to projects where a stakeholder – generally a government department - has paid for a particular service. This has contributed to the poor service of technical committees where there is no such external funding available – but where nevertheless companies have devoted considerable time and resources.

#### *Funding of international representation*

Inadequate funding for international standards representation is a serious issue for AEEMA and CESA members. It leads to Australia being under represented at international standards. At least in the case of the International Electrotechnical Commission (IEC), there must be a physical presence at meetings to influence the development of international standards. If Australia is not represented at IEC meetings, the work undertaken in the Australian committee directed towards influencing the international standard is essentially wasted.

While there may be partial funding for one Australian representative to attend international standards, it is AEEMA's and CESA's contention that funding should be available for at least two representatives. The technical complexity of some international standards committees is such that one individual cannot be expected to provide input on all issues.

#### *Sale of SAI Global*

There is a strong perception among members of AEEMA and CESA that industry was sold short in the creation of SAI Global. The associations object to industry committing considerable time and intellectual effort to the development of technical standards, only to have the intellectual property in such standards taken away and given to an organisation with a profit imperative. AEEMA and CESA would have no objections to a profit being realised on the sale of standards if the proceeds of the sale went to fund standards development. It is a different matter when the sale contributes to shareholders' profits.

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