



STOP SMART METERS AUSTRALIA INC

Reg. No. A0059190N ABN 14 717 028 504

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The Manager, Spectrum Planning Section
Spectrum Planning and Engineering Branch
Communications Infrastructure Division
PO Box 78, Belconnen, ACT 2616
By electronic lodgment

Dear Sir/Madam

Thank you for the opportunity to contribute to the *Spectrum for broadband in the millimetre wave bands* consultation.

Stop Smart Meters Australia (SSMA) is a volunteer-based advocacy group which incorporated as an Association in April 2013 in response to widespread community objection to the Victorian State Government mandated Advanced Metering Infrastructure (AMI) rollout. A number of our 600+ members and 7000+ website followers have had their health adversely impacted as a result of exposure to increasing levels of man-made electromagnetic fields (EMF), not only as a result of smart meter emissions, but also in consequence of irradiation from other radiofrequency emitters.

We are very concerned that the ACMA, in its issues for comment, has not flagged potential adverse impacts on health as a result of the release of 5G mmWave spectrum. Whilst SSMA agrees that a well-functioning communications sector is vital to the Australian economy and that the ACMA needs to be in a position to be agile and responsive, it is imperative that the regulator does not create a situation where there are unintended consequences as a result of acting precipitously.

As our comments apply to all mmWave bands, we are directing our response to the first question listed in the Issues for Comment documentation.

What disposition should the ACMA adopt in progressing possible 5G mmWave bands?

We believe it is imperative that the ACMA does **not** adopt a proactive approach that "would potentially make bands available very early" in view of the potentially devastating effects that this may initiate.

In a [declaration](#) which was sent to officials of the European Commission on 13 September 2017 more than 180 scientists and doctors from 35 countries recommended a moratorium on the roll-out of 5G until potential hazards for human health and the environment have been fully investigated by industry-independent scientists.

In a [press release](#) one of the organisers of the appeal, Lennart Hardell, MD, PhD, Associate Professor, Department of Oncology, Faculty of Medicine and Health, Örebro University, Sweden, explains that “The wireless industry is trying to deploy technology that may have some very real unintended harmful consequences.” He adds, “Scientific studies from years ago along with many new studies are consistently identifying harmful human health impacts when wireless products are tested properly using conditions that reflect actual exposures. With hazards at those exposures, we are very concerned that the added exposure to 5G radiation could result in **tragic, irreversible harm**” (our emphasis).

Transfer of costs and risks from telecommunication carriers to Australian public

Queensland Treasury pointed out in a recent [submission](#) to the Department of Communications and the Arts that the current operation of provisions governing telecommunication carriers' ability to install and maintain telecommunication network facilities on State land or infrastructure is having a detrimental effect on landholders, including the State. Queensland Treasury state that risks encompass matters such as "public health and safety risks, resulting from the location of telecommunications infrastructure on land...". It further points out that this is resulting in an overall "transfer of costs and risks from telecommunication carriers to other parties".

The ACMA will be complicit in further exacerbating the existing skewed situation if it facilitates early progression of 5G mmWave bands. The unparalleled installation of telecommunications infrastructure required to support 5G deployment presents major health and safety risks as it will massively increase irradiation of the public and the environment.

Unfortunately, comment quoted from the then acting Chairman of the ACMA, Richard Bean, in [Media release 30/2017](#) that, "5G in the millimetre wave bands presents a great opportunity to maintain [timely review of spectrum arrangements in support of innovation in the communications industry] so the Australian community will continue to enjoy the benefits of early uptake of new technology", demonstrates a worrying lack of understanding of the potential health and safety risks associated with rolling out 5G.

To give an analogy, if speed limits were removed on regional highways, this would be of benefit to a number of people as they would reach their destinations faster; however, if the increase in speed limit was implemented without consideration for providing safer roads

there would be an associated cost (more injuries and road fatalities in addition to damage to vehicles) that would outweigh any possible public benefit.

Interests of telecommunications carriers taking precedence over public interests

The Property Council of Australia, in its recent [submission](#) to the Department of Communications and the Arts, echoes a view which is held by many of our members in regards to the bullying actions of telecommunication carriers, stating that, "Consultation with our members resulted in the unanimous view that the aggressive, dominant behaviour displayed by telecommunications carriers (carriers) in their dealings with building owners sees owners bearing unreasonable health and safety risks and costs due to carrier activities on their premises".

Given that existing legislation sanctions the trampling of both commercial property owners' and landowners' interests, what might the situation be if 5G deployment is added to the mix? A number of our members and followers suffer debilitating symptoms, not only as a consequence of smart meter emissions, but also when exposed to radiofrequencies from other sources, such as WiFi routers and mobile phone base stations.

Peer-reviewed [published science](#)¹ shows low-intensity radiofrequency radiation exposure leads to a wide range of adverse biological outcomes including fatigue, headaches, sleeping disorders, concentration problems, reduced sperm count and cardiovascular problems.

In some cases the impact on people's health as a result of exposure to radiofrequency emitters has been profound, resulting in high personal costs (loss of career, loss of income, loss of place in society, loss of access to public facilities, loss of friends and family) for these people and their families as well as costs to the wider community. In addition to the decline of health that sufferers experience they are confronted with the need to minimise exposure to wireless emissions, an increasingly difficult challenge as more layers of electro-pollution are rolled out.

A number of our members and followers have been forced to move home and, in some cases, families have been split up (where one member is affected by exposure to EMF) as a consequence of the installation of communications infrastructure near homes. Others have resorted to outlaying considerable sums of money on EMF-shielding products for their homes in a bid to reduce radiofrequency levels. SSMA has had reports of people outlaying tens of thousands (and even over \$100,000) on shielding.

¹The reference list for the *Reported Biological Effects from Radiofrequency Radiation at Low-Intensity Levels* colour chart is available [here](#).

Long-term harm as a result of exposure to EMF appears to have implications not only for current sufferers, but the population and environment as a whole. Signatories to the [EMF Scientist Appeal](#) , which calls for more protective EMF guidelines, state:

"Numerous recent scientific publications have shown that EMF affects living organisms at levels well below most international and national guidelines. Effects include increased cancer risk, cellular stress, increase in harmful free radicals, genetic damages, structural and functional changes of the reproductive system, learning and memory deficits, neurological disorders, and negative impacts on general well-being in humans. Damage goes well beyond the human race, as there is growing evidence of harmful effects to both plant and animal life."

Conclusion

SSMA considers that, in light of the considerations which we have raised in regards to health, it would be wilfully reckless if the ACMA was to embark on a course which fast-tracks 5G mmWave deployment. Instead, we request that a moratorium is placed on the release of 5G mmWave bands until such time as potential risks to humans and the environment have been assessed by scientists who are not funded by industry.

In the Department of Communications and the Arts' [Final Report](#)², dated October 2016, on the recent review of the ACMA, it is stated that the ACMA's decision-makers will need to actively work with consumer groups (as well as industry and government) as potential harms are assessed. The ability to engage with stakeholders transparently is also noted. To-date, the interests of industry appear to trump issues raised by the public.

It is crucial that this situation changes, in order to avert increasing harms to the community and the environment. SSMA urges the ACMA to act prudently in its approach to the progression of 5G mmWave bands.

Yours sincerely



Janobai Smith, BEc (Monash), Cert. EMF Testing (ACES)

Advocacy and Policy Advisor

Stop Smart Meters Australia Inc.

E: policy@stopsmartmeters.com.au

² p. 29, Review of the Australian Communications and Media Authority, Final Report, October 2016