

Telecommunications Amendment (Mobile Phone Towers) Bill 2011

12 March 2012

Committee Secretary
Senate Standing Committees on Environment and Communications
PO Box 6100
Parliament House
Canberra ACT 2600
Australia

Dear Secretary,

Thank you for the opportunity to submit my comments on the Telecommunications Amendment (Mobile Phone Towers) Bill 2011). I do so as a concerned citizen who has researched the health effects of (RF), radio-frequencies for several years, by reading and analyzing many peer reviewed scientific documents and papers (in prestigious journals and elsewhere), and being in contact with some of these well renowned scientists, as a result of necessary knowledge acquisition by being disabled from cumulative (RF) exposure.

Radiofrequency Radiation.

- On May 31–2011, (IARC) International Agency for Research on Cancer an arm of the (WHO) World Health Organization, classified (RF) Radio frequency in the 2B category, possibly carcinogenic. [‘So the classification 2B, possibly carcinogenic, holds for all types of radiation within the radiofrequency part of the electromagnetic spectrum, including the radiation emitted by base-station antennas, radio/TV towers, radar, WiFi, smart meters, etc’.](#)¹

ARPANSA standards legislation ‘Radiation Protection Standard for Maximum Exposure Levels to Radiofrequency Fields, 3kHz to 300 GHz (2002), unable to protect human health.

- For example: There are no scientific studies on long term exposure of (RF) effects on the exposed populations. For industry to claim that (RF) exposure is safe is misleading.
- ARPANSA standard only protects against short term exposure of 6 minute duration, it does not take into account long term cumulative exposures, or, non-thermal effects.

¹ [Email from: Robert A Baan PhD The IARC Monographs. Lyon FRANCE](#)

- ARPANSA follows the standard based on the SAM model (specific anthropomorphic mannequin), which is a 6 foot tall male over 200 pound military personnel.
- Standards have no consideration for children. Children do not have fully formed blood brain barrier to protect the brain from toxins and carcinogens. Their cells divide rapidly.
- ‘EMF’s generated by (RF) sources couple with the body, resulting in induced electric and magnetic fields and associated currents inside tissues. The most important factors that determine the induced fields are the distance of the source from the body and the output power level. Additionally, the efficiency of coupling and resulting field distribution inside the body strongly depend on the frequency, polarisation, and direction of wave incidence on the body, and anatomical features of the exposed person, including height, bodymass index, posture, and dielectric properties of the tissue. Induced fields within the body are highly nonuniform, varying over several orders of magnitude, with local hotspots’².
- Scientific studies have found adverse effects on the body, indicating an immune response and illness manifestation, at levels of (RF) exposure thousands of times lower than the ARPANSA standard³.
- Standards do not consider Persons who suffer greatly from Electro-Sensitivity⁴.
- Some persons in Australia are sensitive to (RF) emissions. This is not psychosomatic nor idiopathic. It is an immune response to the body-burden of cumulative (RF) exposure.

². *Lancet Oncology*, 12 (2011) 624-626. doi:10.1016/S1470-2045(11)70147-4

³. BioInitiative Working Group, ‘BioInitiative Report’, 2007, www.bioinitiative.org

⁴. [Int J Neurosci](#). 2011 Dec;121(12):670-6. Epub 2011 Sep 5.

Telecommunications (Low-Impact Facilities) Determination 1997 is Inconsistent.

- For example: the above determination relies on the height of the transmitter, and visual impacts, (aesthetics), and not the amount of (RF) radiation produced by the transmitter. The accumulation of more than one transmitter at any given location will increase the levels of (RF) radiation exposure. It is therefore disingenuous for the 1997 act to only rely only on the height of transmitter[s] as a measure of safety, without acknowledging the (RF) radiation being transmitted is on a 24 hour 7 days a week basis, and does have cumulative health effects on the population.
- The Code for Radiocommunications Infrastructure only applies to telecommunications carriers and not to the companies constructing the infrastructure which enables the emissions of (RF) radiation, such as broadcast equipment, radio masts for smart meters.

The Democratic Process.

- Current telecommunications legislation is a complete mess as it marginalizes and disempowers the community as if they do not exist. The general public has no legal rights regarding location of infrastructure in their own neighbourhood. ACIF code for deployment of radiocommunication infrastructure ensures that communities receive notice about facilities at new sites, however it does not oblige carriers to take any notice of community feedback. This makes a complete mockery of the democratic process.
- Often when a tower is about to go up, there will be a notice in the local rag/messenger, by the telecommunications carrier that there are no health effects, (even after the IARC 2B classification). Clearly these actions are obfuscating the truth and misleading public.

Australian Government Duty of Care.

The Australian government has a duty of care to the Australian public, to future generations and to the environment that supports humanity. In the matter of telecommunications infrastructure, it has demonstrated itself to be biased towards the telecommunications industry at the expense of the community, public health and the environment. The telecommunications industry has been involved in:

- Standards Australia TE7 committee.
- ARPANSA working group for the 2002 RF standard.
- NHMRC committee that allocated funding for research on the health effects of radiocommunications infrastructure.
- Australian Centre for RF Bioeffects Research (ACRBR).
- Australian Communications Industry Forum (ACIF) Code for the Deployment of Radiocommunications Infrastructure and the Communications Alliance revision of that Code, effective from July.

The Federal government is the recipient of substantial revenue from the telecommunications industry. It is predicted to receive up to \$4 billion dollars for the renewal of carrier spectrum licences and additional income is expected from the sale of spectrum in the 700 MHz band ⁵.

In order to demonstrate some impartiality, the Senate Committee undertaking this inquiry is advised to accept evidence from witnesses who do not directly profit from the propagation of the telecommunications network. It has come to my attention that witnesses at the hearing of 17 February are all affiliated with government agencies, or telecommunications industry. This does not give the impression that the enquiry will not have predetermined biased decisions.

⁵. *Australian 02.01.12; Australian Financial Review 10.02.12*

The witnesses invited to address the inquiry are:

- ALTHAUS, Mr Chris, Chief Executive Officer, Australian Mobile Telecommunications Association.
- CHEAH, Mr Chris, Authority Member, Australian Communications and Media Authority.
- COLTON, Dr Imogen, Manager, Carrier Powers and Immunities, Department of Broadband, Communications and the Digital Economy.
- JOHNS, Mr Michael, Project Manager, Communications Alliance Ltd.
- LARSSON, Dr Carl-Magnus, Chief Executive Officer, Australian Radiation Protection and Nuclear Safety Agency.
- LONEY, Mr Mark, Acting General Manager, Communications Infrastructure Division, Australian Communications and Media Authority.
- MARTIN, Dr Lindsay, Manager, Non-Ionising Radiation, Radiation Health Services, Australian Radiation Protection and Nuclear Safety Agency.
- MASON, Mr Philip, Assistant Secretary, NBN Regulation Branch, NBN Infrastructure, Department of Broadband, Communications and the Digital Economy.
- MCKENZIE, Mr Ray, Manager, Mobile Carriers Forum, Australian Mobile Telecommunications Association.
- QUINLIVAN, Mr Daryl, Deputy Secretary, Infrastructure Group, Department of Broadband, Communications and the Digital Economy.
- STANTON, Mr John Leslie, Chief Executive Officer, Communications Alliance Ltd.

Economic Burden and Responsibility.

It is a well known fact that many insurance company's refuse to insure the telecommunications industry for fear of future litigation. One such company, Swiss Re, one of the largest re-insurance companies in the world, does not re-insure mobile phones for health risks. Following are excerpts from its 1997 paper: "[Electro-smog is suspected of promoting cancer and other diseases. Prevailing opinion assumes, however, that the electrical engineering and power industries can only be held liable if science provides conclusive proof – which it has not done to present – that weak electromagnetic fields impair health](#)". This publication comes to the opposite conclusion and shows that on the basis of present knowledge, it must be expected that plaintiffs will win suits dealing with this issue." ⁶.

- Who will be the bearer of future litigation regarding health effects from (RF) will it be industry or the Government? This situation needs to be addressed. I do not believe there has been any health risk analysis nor foresight by government or the telecommunications industry regarding health impacts, and the huge economic burden to society, Government, Physicians, Neurosurgeons, Neurologists, all facets of the medical industry, not to mention lost work production, as people become sick from (RF) cumulative over-exposure.

⁶. www.emfandhealth.com/Swiss-ReElectrosmog.pdf

- The Digital economy in its present form is not sustainable in the long term due to the rapid deployment of this technology, without addressing the health harm, as if there is no evidence, or, no conclusive evidence. Absence of evidence is not evidence of absence. The scientific evidence of health harm from (RF), both by industry and independent have been accumulating for years. For the telecommunications industry to deny this is bordering on criminal neglect, as they know very well the science, as they have funded some of it.
- The only way this situation will change is to address institutionalized corruption by a completely independent entity which has not been compromised, and ensure complete transparency, and any conflicts of interest, perceived or otherwise must be declared in full.
- There needs to be a national register that will document the symptoms of those sensitive to (RF) exposure, and follow up by knowledgeable Physicians who understand about (RF) exposure is recommended, including mitigation strategies and methods to repair the immune system to ensure homeostasis, and alleviate suffering and pain.
- Residents should have access to information regarding the (RF) emissions from base stations, transmitters, and the like. This should not be hidden from them, as they have the right to protect their children from any toxin or carcinogen, (RF) being a 2B carcinogen.
- The telecommunications industry make copious amounts of money through their well trained lobbyists and extravagant media campaigns, and by maintaining scientific uncertainty they are definitely not short of dollars. The ARPANSA standard to protect public health from the long term, chronic exposures which occur with telecommunications infrastructure is completely inadequate. Several studies suggest that base stations do produce carcinogenic effects in the long term. In the event that this happens in Australia, I propose it is reasonable and just that the legislation requires telecommunications carriers to guarantee compensation to those affected, and that the legislation requires the telecommunication carriers to be audited to ensure that the funds are available when required.

Thank you for your consideration of my comments.

Yours Sincerely,
Enrico Grani