

21/2/2017

Paul Lindwall  
Commissioner  
GPO Box 1428  
Canberra ACT 2601  
Email: [telecommunications@pc.gov.au](mailto:telecommunications@pc.gov.au)

Dear Mr Lindwall

Thank you for the opportunity to comment on the Productivity Commission's draft report dated November 2016 in relation to the Telecommunications Universal Service Obligation Inquiry. This Inquiry is very important to me as my family is planning on moving to a low-EMF (electromagnetic fields) rural property due to my health problems.

I am a person who has been medically diagnosed as being EHS (electrohypersensitive). Due to my sensitivities when exposed to radiofrequency emissions, I am unable to use or be near mobile phones, wireless routers, mobile phone towers, smart meters and other wireless devices, without suffering severe and often debilitating symptoms.

Five years ago I was left with no alternative but to give up my teaching career, as I could not tolerate the Wi-Fi that was being installed in all the classrooms.

I cannot use a mobile phone, nor travel in a vehicle with one turned on.

As more and more wireless technology is saturating the environment, my life is becoming more and more unbearable.

To lose access to a landline would simply be the last straw. I believe that it would also be unlawful as it is discriminating against a person with a disability and would be treating them unfairly in regards to their disability. See: <https://www.humanrights.gov.au/our-work/disability-rights/publications/know-your-rights-disability-discrimination>

It would be a reasonable adjustment to make a safer environment for the EHS person to have corded landline phones where NBN fibre optic is not available, which would eliminate totally that particular source of radiofrequency (RF) microwave emissions.

As the “experts” cannot guarantee that wireless technology is safe and that long term exposure to chronic long term exposure to low level electromagnetic radiation (EMR) will not cause any adverse health

effects, then it makes sense to introduce the Precautionary Principle to minimise exposure. This is particularly true when it comes to children.

It is inconsistent that ARPANSA (Australian Radiation Protection and Nuclear Safety Agency) has a fact sheet 14, which says “wireless technology is so new we can’t be sure there isn’t some risk” and advises parents to limit their child’s exposure, and expect that the only source of communication from their home would be by mobile phone.

ARPANSA RF standards are closely aligned with ICNIRP (The International Commission on Non-Ionizing Radiation Protection) guidelines, but it would seem that ICNIRP itself ([page 546,   
http://www.icnirp.org/cms/upload/publications/ICNIRPphilosophy.pdf](http://www.icnirp.org/cms/upload/publications/ICNIRPphilosophy.pdf)) recognises that these are only guidelines, are not necessarily prescriptive and are inadequate. ICNIRP states:

“Under such circumstances it may be useful or necessary to develop separate guideline levels for different groups within the general population but it may be more effective to adjust the guidelines for the general public to include such groups.”

“Some guidelines may still not provide adequate protection for certain individuals nor for normal individuals exposed concomitantly to other agents, which may exacerbate the effect of the NIR [non-ionising radiation] exposure, an example being individuals with photosensitivity.”

These standards only consider thermal effects and do not take into consideration the biological effects demonstrated by thousands of international studies.

Other governments, including those of China, Switzerland and Russia, as well as at least nine EU Member States, have set their own “preventative” exposure limits which are significantly lower than those outlined in ICNIRP.

Sweden recognizes EHS as a functional impairment.

The Austrian Medical Association has a set of guidelines for the treatment of EMF related health problems. See:

<http://www.magdahavas.com/wordpress/wp-content/uploads/2012/06/Austrian-EMF-Guidelines-2012.pdf>

ANSES, the French Agency for Food, Environmental and Occupational Health & Safety, on 15 October 2013, recommended that all intensive adult mobile phone users (in talk mode) use hands-free kits and that children's exposure is reduced by encouraging moderate use of mobile phones. Further to this, the French Parliament passed legislation in January 2015 limiting toddlers and children's exposure to wireless emissions.

The World Health Organization agency classifies RF electromagnetic energy (EME) as possibly carcinogenic to humans, group 2B (May 31<sup>st</sup>, 2011).

Australia appears to be sadly lagging behind the rest of the world.

It is my recommendation that the Commission meet responsibilities under the Disability Discrimination Act and recommends maintenance of a landline service for all people in rural areas.

Thank you

Regards

Maureen Kirsch