

Communications Alliance Limited  
P.O. Box 444  
Milsons Point  
NSW 1565

RE: Mobile Phone Base Station Deployment Industry Code (C564:2011)

Dear Sir/Madam,

Thank you for the opportunity to comment on the above Code. Your explanatory statement of the Code mentions “the precautionary approach”. *“ A common request of industry is that it should adopt a precautionary and more consultative approach to the deployment of mobile phone base stations. In relation to both low impact and non low impact facilities, this Code requires a consultative approach and provides a context for applying a Precautionary Approach to the deployment of mobile phone base stations. The Precautionary Approach is embodied in Australia’s Intergovernmental Agreement on the Environment and a number of international documents (See The Precautionary Principle in Appendix A of the Code). An underlying principle of this Code is that public health and safety is of paramount importance. In the context of this Code, the precautionary principle therefore means that precautions are taken to minimise exposure to radio emissions by virtue of their possible association with health problems in order to protect people even though radio emissions at low levels have not been proven to cause such problems.” In this Code, the Precautionary Approach is manifested in the obligations it imposes on Carriers.”*

In appendix A , the Precautionary Principle , you state that *“the application of the precautionary principle to the siting of radio communications infrastructure should include a consideration of the uncertainty of the science on a-thermal effects”, and that “there is a need to balance the requirements for the Telecommunications Industry to provide adequate service with the need of the community to be ensured of living in an environment that will not be a potential threat to health”.*

The reality is that many Australians are reporting adverse health symptoms which they attribute to exposure to RF EMR from wireless technology including Mobile base stations. People who report these symptoms are ignored or simply fobbed off. Scientific studies that show significant health problems associated with proximity to base stations are being downplayed or disregarded.

There are a growing number of people who are EHS (Electro Hyper Sensitive) to EMR emissions and are being forced to either uproot from their homes and move to remote areas or stay and endure often painful

and debilitating symptoms – headaches, fatigue, muscle and joint pain, heart palpitations, visual and cognitive disturbances, sleeping disorders, dizziness and nausea.

Community health and safety should be your highest priority. Hiding behind ARPANSA's "standards" is not a get out of jail free card for your responsibility and duty of care as these standards are merely guidelines and not necessarily prescriptive. They are vastly inadequate for the protection of particularly vulnerable members of the community such as children, pregnant women, the elderly and EHS sufferers.

Provision in the Code to allow more time for Council and community consultation is disingenuous as the reality is that the any recommendations and concerns presented carry very little weight and are simply overridden.

Your Code references to "sensitive siting" are not indicative of the reality when base stations are being sited in school grounds, next to parks and playgrounds, on top of childcare centers and hospitals, directly impacting those who are most vulnerable.

The term "low impact" is extremely misleading as this only addresses the visual aspects. Towers are often lowered and painted to blend in with the surroundings. Once again the reality is that many of these towers have increased levels of radiation due to the lowering of the towers and the co-location of more antennas and masts on existing infrastructure. This is deceptively impacting on an already unsuspecting public.

People who suffer from EHS urgently need to be accommodated for as they should be protected and recognized as per your responsibilities in compliance with the disability discrimination act.

White zones need to be set aside with Government and Telco assistance.

The Communications Alliance has an ethical and moral responsibility to safeguard EVERY member of the Australian community and this needs to be addressed immediately, otherwise any Code is meaningless.

Yours Sincerely

Maureen Kirsch  
15/05/2017