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30/05/24

AEMC
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Dear AEMC Team

Accelerating smart meter deployment rule change

I am writing to state my views on the draft determination and rule for accelerating smart meter deployment.

Note: Use of the name smart meter in this submission, also means: advanced meter, communicating meter, type-4 meter (all of which are a two-way digital communication system). A type-4A meter means the communicating device in the smart meter has been disabled, and therefore the meter must be manually read.¹

I do not consent to the installation of smart electricity meters that emit radiofrequency (RF) radiation on my home. This is because RF radiation is shown to be harmful to human health and to that of all living creatures. In May 2011, cancer risks from RF radiation were evaluated by the International Agency for Research on Cancer (IARC) and evidence found that RF radiation increased the risk for glioma and acoustic neuroma. RF radiation was classified as Group 2B, a possible human carcinogen. ²

The legislation must be changed to ensure that all wireless smart meters are labeled with information that they emit radiofrequency radiation that is a Class 2B carcinogen.

I am opposed to the roll-out of radiation emitting smart meters because of the harm they cause to people with electromagnetic hypersensitivity (EHS). To begin with, an affected person can spend a great deal of time, energy and money to eventually find that the cause of their debilitating symptoms is, in fact, caused by RF radiation emissions, assaulting them in their homes and workplaces.

The World Health Organisation, in Prague, 2004, defined EHS as:
“... a phenomenon where individuals experience adverse health effects while using or being in the vicinity of devices emanating electric, magnetic, or electromagnetic fields (EMFs)...”³

In 2015, the Electromagnetic Biology and Medicine Journal, published a review 'Oxidative mechanisms of biological activity of low-intensity radiofrequency radiation' that stated persons suffering from EHS suffer from skin- and mucosa- related symptoms, such as: itching, smarting, pain, heat sensation, or heart and nervous system disorders after exposure to electromagnetic devices. It was found that the disorder is growing continuously, which started with 0.6% of the total population in 1985, with the category increasing to 9-11% of the European population, as at 2006. EHS disorder is now officially recognised in Sweden as a health impairment. ⁴

Some common signs and symptoms of EHS include:

- Headache
- Thought processing difficulties
- Memory impairment
- Heart palpitations
- Sleep disorder
- General malaise
- Blurred vision
- Weakness
- Dizziness
- Chest discomfort
- Muscle pain
- Tinnitus
- Fatigue
- Nausea
- Night sweats
- Restless legs
- Paresthesias 3

Both epidemiological and experimental evidence, that has established a causal relationship between electromagnetic fields (EMF) and cancer, has also found other adverse health effects including:

- Adverse effects on fetal development
- Adverse effects on the endocrine system
- Biochemical alterations such as DNA damage
- Increased production of free radicals
- Signals predictive of cancer and other degenerative diseases 5

The legislation must require electricity companies to compensate customers for any harm caused by their RF radiation emitting smart meters.

Electricity companies, must, by way of compensation, ensure that affected people have an electro-sanitised house to live in, and employers provide an electro-sanitised area for affected people to perform their work, in the workplace. People disabled from RF radiation have the same right to access living and working spaces as, for example, a person in a wheelchair, who is provided with ramps, wheelchair accessible transport, and wheelchair friendly housing, or modifications to existing housing. However, the most efficient solution is to take preventative action and to install only Type 4A power meters throughout Australia (if new meters are required). 6

If proof of EHS is required, then independent specialised doctors must be made available, at no cost to the customer, as part of the required process. It is currently out of the average persons financial reach to access EHS medical diagnosis and treatment. Such specialised medical facilities must be established throughout all Australian cities, with extra support for rural people to access. This is the potential reality and the electricity companies may very well find it most economical to deploy Type 4A meters (at no fee to the customer) and pay employees to read the meters.

An important question at this point in my submission is: how can one minimise exposure to a smart meter that is communicating every 30 minutes (or less) in the home and workplace? An

effective recommended action is to minimise exposure to RF radiation emitting sources, and most importantly it is suggested to use only wired devices. However, there is no possible way for a resident in a home, or employee in the workplace, to protect themselves by reducing exposure to a communicating smart meter, as they are unable to turn it off - only the providing electricity company has that control. Therefore, the only way to protect Australians is to establish appropriate public policy that prioritises and guards the safety of the people from potentially harmful materials, practices or technologies. Until suitable policy is created and implemented, the Precautionary Principle must be urgently applied, and the deployment of smart meters must be halted immediately. Further, a safety recall of all installed smart meters in Australia must be urgently issued. 6

The Australian public's exposure to, and potential harm from anthropogenic electromagnetic fields, especially those arising from the deployment of smart meters, and their infrastructure, can no longer be ignored.

Why do government and electric companies believe they can lawfully impose upon every Australian premise that requires electricity, a dangerous RF radiation emitting smart meter, that is proven to cause serious harm to human health? Australians are under serious assault in their own homes and workplaces from electric companies, and the government.

I do not believe it is appropriate for electricity companies to be collecting data about people's electricity usage and sharing it with third parties. There is potential benefit to 'a range of corporations in the power industry, corporations in other industries, particularly consumer marketing; and they may also include government agencies concerned variously with data collection (e.g. ABS), economics, public policy, and law enforcement. Some organisations of relevance appear to be 'retailer', 'local retailer', 'market small generation aggregator', 'metering provider', 'metering coordinator', 'distribution network service provider', 'network provider', 'network manager', the regulator AEMO, and its agents and any regional regulators, and the energy ombudsman. So the number of points of data-exposure is very large. It is far from easy to find out what categories of organisation exist, and what access each has to the data.'7

The collection of data from households presents security risks because vacant low-occupancy premises can be detected, and inferences made with confidence about the number, and even age and gender of the occupants, while revealing their power-usage patterns. If there is a change to very short interval data collection (e.g., 5 secs) then it may be possible to detect individual device-types being used.'7

This is good reason for the Australian public to have privacy concerns.

Thank you for the opportunity to submit my comments and I look forward to receiving your response.

Yours sincerely

A solid black rectangular box used to redact the signature of Joanne Grant.

Joanne Grant

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