

AEMC
Level 15 60 Castlereagh St
Sydney NSW 2000

Mrs Maureen Kirsch

28/5/2024

To the AEMC

Re: Accelerating smart meter deployment rule change.

I am writing to you to put forward my views on your rule change as stated in the National Electricity Objective (NEO):

“ to promote efficient investment in, and efficient operation and use of, electricity services for the long term interests of consumers of electricity with respect to:

- a. price, quality, safety, reliability and security of supply of electricity; and
- b. the reliability, safety and security of the national electricity system; and
- c. the achievement of targets set by a participating jurisdiction—
 - i. for reducing Australia's greenhouse gas emissions; or
 - ii. that are likely to contribute to reducing Australia's greenhouse gas emissions.”

Safety

As safety is listed as a major objective, then the safety of all people should be considered. Vulnerable people with sensitivity to RF technology should NOT be required to have a RF emitting device installed on their home. This would greatly affect people with Electromagnetic Hypersensitivity (EHS).

As a Victorian, I have been directly affected by the RF emissions from smart meters. In 2011, shortly after a smart meter was installed on our home (unbeknown to me at the time) I became very unwell. The smart meter triggered my EHS, to the point that I had to resign from my 30-year teaching career and had to move out of our home to one that did not have a smart meter.

I am still being impacted health wise from smart meters in our area. I now suffer from chronic insomnia, head pressure, ringing in my ears, (microwave hearing), constant muscle aches and pains. I cannot tolerate Wi-Fi or any RF emitting devices. I have had no phone for over three years, since our landline was cut off and have been unable to work due to my sensitivities to RF. I have a comprehensive medical certificate from a qualified medical practitioner to support my EHS condition.

I have lost my freedom of movement as smart meters are in most homes and wireless devices are in shopping centres, cafes, libraries etc.

ARPANSA (Australian Radiation and Nuclear Safety Agency) the advisory body in relation to radiofrequency “Standards” is not qualified to give health advice, yet they are being used as the yardstick for the safety of these meters.

In the Foreword of the ARPANSA Standard it states: ‘It is recognised that the Standard does not operate in isolation from the legal framework within Australia. Relevant Australian occupational, health, safety, and environment laws provide obligation on employers, and the designers, manufacturers and suppliers of plant or equipment, to ensure that their activities, or their plant and equipment, do not

represent a risk to the health and safety of their employees or third parties who may be affected by them. In effect, such laws require relevant parties to continually assess and improve the safety and health impact of their activities. '(ARPANSA Standard Publication No.3).

In line with the above it is incumbent upon the purveyors of RF-EME technology and equipment and activation of such RF-EME systems, in this case the Power company installing Smart Meters, that the safety of third parties are not affected by such installation.

Customers should therefore be informed that smart meters emit RF Electromagnetic radiation, which has been classified by the WHO (World Health Organisation) as a Class 2B carcinogen.

They should also be informed that some people are more vulnerable to this radiation, including children, elderly and sensitive people.

The legislators, electricity providers and installers of smart meters should carry insurance to provide compensation for those affected by the adverse health affects from the smart meter technology.

I am aware of many other Victorians who were similarly affected when the smart meters were installed. Some of these people actually fled interstate or overseas.

I would like to point you to a published article titled 'Symptom Development from Exposure to Radiofrequency Fields of Wireless Smart Meters in Victoria, Australia'. The article is peer reviewed and was published in the Nov/Dec 2014 issue of the PubMed listed US medical journal 'Alternative Therapies in Health and Medicine'. The PubMed listed abstract can be found here:
<http://www.ncbi.nlm.nih.gov/pubmed/25478801>

This case series includes 92 residents from Victoria.

The report points to significant health issues associated with exposure to wireless smart meters. As a result, it cannot be stated that 'wireless smart meters are safe'.

Note: I have added an Appendix on EHS to my submission.

Security

I also oppose the rollout of smart meters for security reasons and the vulnerability of our electricity supply when reliant on wireless technology. I am very concerned about what will happen if our electricity grid and smart meters are hacked, as has happened with other large corporations (E.g. Optus and Medicare).

Loss of Privacy

The deployment of advanced metering will provide an unprecedented opportunity for “ third party” data sharing. It will also show real time surveillance of a person’s home: when they are home or when the home is unoccupied.

Price/Cost

Who is paying for the replacement meters? How much will they be costing each householder?

It should also be noted that in Victoria in 2009 and 2015 the previous Auditor – Generals were very critical of the rollout.

In 2009 the Auditor-General's assessment on smart meters was that the "*cost-benefit study behind the AMI decision was flawed and failed to offer a comprehensive view of the economic case for the project*".

The Auditor-General also stated that the previous cost-benefit study had "*failed to take into account the implications of the implementation risks, particularly risks from unproven technology*".

More alarmingly, *no* recognition was given to emerging risks associated with the power distributors' decision to deploy wireless networks, which involves the forced irradiation of the Victorian population with pulsed radiofrequencies.

The AEMC's draft rule would see the same thing happening in other parts of Australia.

Before any fast tracking of this "smart" technology, a full independent health study should be made to make sure that what happened in Victoria, to innocent people, does not happen again.

Victorian Auditor-General 2009, *Towards a 'smart grid' – the roll-out of Advanced Metering Infrastructure*,

<https://www.audit.vic.gov.au/report/towards-smart-grid-roll-out-advanced-metering-infrastructure>

It was stated "a high degree of uncertainty existed around the economic case for the program. ...the program has changed significantly since its inception, and the fact that there is now expected to be a substantial net cost to consumers over the life of the program substantiates the flaws identified in our 2009 report."

Is the economic case any better for areas outside of Victoria?

There will be a further cost to consumers if a customer, who is still able to have a non-communicating (Type 4A) meter is financially penalised, if meter-reading fees are imposed.

I am also concerned about the reduction of the number of notices retailers will be required to send out to customers; from two notices to one and the minimum number of business days to be reduced from 15 to 4 days as this favours Industry over the customer.

As a parent, who has family living in Queensland, I am very concerned for them, as they would be affected by this rule change.

I thank you for the opportunity to submit my concerns.

Regards

Maureen Kirsch

APPENDIX: Electromagnetic Sensitivity (EHS)

EHS is recognised internationally as a growing health problem. EMF sensitivity affects an estimated 1.5 to 13.3%¹ of the population internationally, according to population-based surveys in various countries. A 2019 report² observing more than 435,000 UK residents gave the most recent estimation of the prevalence of EMF sensitivity. Just recently an EHS WORKSHOP at the EU Parliament was held on 13 April 2023³.

Symptoms of microwave radiation exposure include insomnia, headaches, fatigue, stress, pain, and even skin rashes. Individuals with chronic diseases may experience a worsening of pre-existing symptoms as part of microwave syndrome, according to research. A full list is in a table appended to this letter.

EHS is accepted as a functional impairment in Sweden and the Canadian Human Rights Commission recognises it as an Environmental Sensitivity and classifies it as a disability. The Austrian Medical Association has guidelines for the diagnosis and treatment of EHS.

The WHO (World Health Organisation) which is responsible for the International Classification of Disease (ICD) has in its 10th Edition a classification for illness as a result of exposure to non-ionising radiation. The code is “ W90”.

Professor Dominique Belpomme is a professor of oncology at Paris-Descartes University and president of the French Association for Research on Treatment Against Cancer (ARTAC). Since 2008, Dr. Belpomme’s medical team has studied many hundreds of European patients who suffer from electromagnetic intolerance syndrome. The team has developed EHS diagnostic methods based on blood tests and special brain scans (pulsed Doppler echography). Their research shows multiple abnormalities in blood and tissue.⁴

Dr Erica Mallory- Blythe is a UK trained medical doctor and founder of PHIRE. (Physicians’ Health Initiative for Radiation and Environment). In 2008, she began researching biological effects of wireless radiation. This research included copious literature appraisal, conducting her research via medical histories, medical examinations and provocation testing of those with Electromagnetic Hypersensitivity (EHS). She has provided expert witness statements regarding EHS, and been invited to discuss the public health concerns of radiation exposure at the highest political level both in the UK, and in Europe.⁵

Professor Olle Johansson PhD is a past associate professor at the Karolinska Institute, Department of Neuroscience, and head of The Experimental Dermatology Unit as well as a guest and adjunct professor in basic and clinical neuroscience at the Royal Institute of Technology, Stockholm. He is a global authority in the field of health effects of electromagnetic radiation (EMR)

In Australia, we have no such recognition or support for people with EHS. Moreover, the wireless industry thinks that it is in its best interests to label people with the condition as suffering from a psychosomatic condition. Industry uses its influence in the media and government to solicit opinions from doctors with little

¹ Electromagnetic hypersensitivity--an increasing challenge to the medical profession.

<https://pubmed.ncbi.nlm.nih.gov/26372109/>

² <https://www.ommegaonline.org/article-details/The-Prevalence-of-People-With-Restricted-Access-to-Work-in-Man-Made-Electromagnetic-Environments/2402>

³ https://www.youtube.com/watch?embeds_euri=https%3A%2F%2Fbetweenrockandhardplace.wordpress.com%2F&source_ve_path=Mjg2NjQsMTY0NTAz&feature=emb_share&v=s1Kn7pGy3CI

⁴ https://www.radiationresearch.org/images/rrt_articles/IAJ_EMF_BRUSSELS_Revised_0141124A.pdf

knowledge of the subject matter. Due to this situation very few in the medical profession in Australia are capable of diagnosing this condition.

I would like to point you to several documents that highlight the need for more investigation into the health effects of EMR. These are as follows:

1) "A Case Report: The Microwave Syndrome after Installation of 5G Emphasizes the Need for Protection from Radiofrequency Radiation" by Lennart Hardwell Mona Nilsson.⁶

2) "Wireless technology is an environmental stressor requiring new understanding and approaches in Health Care." Julie E. Mc Credden, Naomi Cook, Steven Weller and Victor Leach⁷.

3) Press enquiries to: Education Health Care Plan (EHCP) awarded (July 2022) for UK child on the basis of Electromagnetic Hypersensitivity. (EHS) In the UK, EHS is now recognised as a medical condition and has to be accommodated for sensitive children⁸.

4) 2020 Consensus Statement of UK and International Medical and Scientific Experts and Practitioners on Health Effects of Non-Ionising Radiation (NIR) Dr. Erica Mallery-Blythe Release date: 10/11/2020 (Signed by groups representing > 3500 medical doctors)⁹.

5) EUROPAEM EMF Guideline 2016 for the prevention, diagnosis and treatment of EMF-related health problems and illnesses.¹⁰

Since developing this condition, for which I have undergone diagnostic testing and have been medically diagnosed, I have come to know many others who are also suffering as a result of EMR exposure.

Many of these people are unable to work due to their sensitivity and their inability to tolerate the environment where there are EMR- emitting devices. (E.g. Wi-Fi, mobile phones, etc.) Some have fled their homes and live in vans or isolated locations away from family members. Everyday places like shopping centres, libraries, public transport, and cafes are no-go places for EHS people as they are heavily impacted.

Many of these people feel marginalised and are often ridiculed by those who do not understand this condition.¹¹

SYMPTOMS OF ELECTRO HYPERSENSITIVITY

⁶ https://www.gavinpublishers.com/assets/articles_pdf/Case-Report-The-Microwave-Syndrome-after-Installation-of-5G-Emphasizes-the-Need-for-Protection-from-Radiofrequency-Radiation.pdf

⁷ https://www.gavinpublishers.com/assets/articles_pdf/Case-Report-The-Microwave-Syndrome-after-Installation-of-5G-Emphasizes-the-Need-for-Protection-from-Radiofrequency-Radiation.pdf

⁸ <https://phiremedical.org/wp-content/uploads/2022/10/phire-2022-press-release-hm-courts-and-tribunals-service-ehcp-for-uk-child-with-ehs.pdf>

⁹ <https://phiremedical.org/wp-content/uploads/2020/11/2020-Non-Ionising-Radiation-Consensus-Statement.pdf>

¹⁰ <https://bhiremedical.org/wp-content/uploads/2020/11/2020-Non-Ionising-Radiation-Consensus-Statement.pdf>

SYMPTOMS OF ELECTRO HYPERSENSITIVITY					
Neurological		Cardiac	Respiratory	Dermatological	Ophthalmologic
headaches	depression	palpitations	sinusitis	skin rash	deteriorating vision
difficulty concentrating	anxiety	pain or pressure in the chest	asthma	facial flushing	pain or burning in the eyes
muscle and joint pain	confusion and spatial disorientation	low or high blood pressure	bronchitis	itching	pressure in/behind the eyes
memory loss	fatigue	shortness of breath	pneumonia	burning	floaters
dizziness	weakness	arrhythmias			cataracts
nausea	tremors	slow or fast heart rate		swelling of face and neck	
irritability	muscle spasms				
numbness	leg/foot pain				
tingling	"Flu-like" symptoms				
hyperactivity	fever				
altered reflexes	insomnia				
OTHER					
digestive problems	abdominal pain	testicular/ovarian pain/swelling	enlarged thyroid	great thirst	dehydration
nosebleeds	internal bleeding	hair loss	pain in the teeth	deteriorating fillings	Light sensitivity
swollen lymph nodes	loss of appetite	hypoxia	allergies	frequent urination and incontinence	night sweats
immune abnormalities	redistribution of metals within the body	ringing in the ears (tinnitus or similar chronic ear-noise)	impaired sense of smell	altered sugar metabolism	dryness of lips, tongue, mouth, eyes
Severe reactions can include seizures, paralysis, psychosis, and stroke					

Symptom chart courtesy of <http://www.weepinitiative.org/areyou.html>