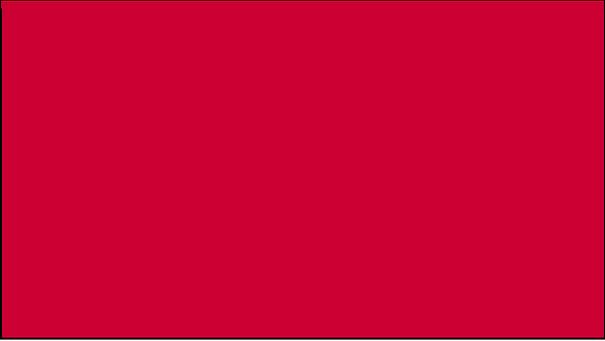


Your response

Question	Your response
<p>Do you agree with our proposal to take steps to mitigate risks related to EMF and be in a position to hold licensees, installers and users to account if issues are identified? Please explain the reasons for your response.</p>	<p>Confidential? – N Yes.</p> <p>Although ICNIRP certification may be provided by operators, we find that when requested, the operators do produce certificates showing compliance, however these certificates have been signed off by the operators themselves. We would suggest that such a certificate would not illustrate an impartial, non-biased view of the exposure levels and compliance with ICNIRP. This becomes even more significant because the rollout of 5G often depends on such compliance.</p> <p>We also note that operators are not obliged to provide ICNIRP certificates or any plans showing the exclusion zones, which makes it more difficult for the landowners to identify risks.</p> <p>Furthermore, single landowners may feel powerless against large organisations and would find it difficult to hold them accountable even if an EMF related issue was discovered. A government body such as OFCOM would provide much needed support to the landowners in holding operators accountable.</p>
<p>Do you agree with our proposal (a) to include a condition in spectrum authorisations requiring compliance with the basic restrictions for general public exposure identified in the ICNIRP Guidelines; and (b) that this condition should apply to equipment operating at powers greater than 10 Watts?</p>	<p>Confidential? – N (a)Yes. Compliance with restrictions is essential. It may be that further restrictions are introduced.</p> <p>We refer to your most recent publication dated 21 February 2020 which measured EMF emissions from various telecommunications sites across 16 UK cities. In this report you advised that the emissions were “a small fraction of the levels included in international guidelines “– ICNIRP.</p>

	<p>We note that the results are based on data collected over a 6-minute period in each measurement location. It follows that the long term exposure levels are unknown. This can be particularly important within urban locations where the prolonged EMF exposure would fall on the general public – residents or employees working or living just below and/or adjacent to a rooftop telecommunications site. The exposure to emissions for such peoples may span from circa 8 to 12 hours every day. Rural locations can result in similar unintended exposure, particularly where sites may be located near to farm buildings or indeed where farm machinery may pass close to the site on a regular or prolonged basis. For example, the cab height of a modern combine harvester is 4m above ground level.</p> <p>We also find that the exclusion zones for 5G installations span across much larger areas (public exclusion zones can extend 40 – 50 metres across and 7- 8 metres below) compared to 4G, which means that more of the public could be affected by the emissions; and a greater area needs to be identified for those unaware of such risks. This becomes even more significant when street furniture is being used as a vessel for 5G equipment. So in our view, although the short-term exposure to EMF may not be harmful, the long term-exposure is unknown and may pose serious health risks.</p> <p>(b) On the basis of the above, we would suggest that equipment at powers less greater than 10 Watts is reasonable, however, we consider that further research is required.</p>
<p>Do you agree with our proposed guidance on EMF compliance and enforcement? Please explain the reasons for your response.</p>	<p>Confidential? – N Yes.</p> <p>On the matter of EMF compliance and processes, we would also suggest that operators should, upon request produce full plans showing clearly the public and exclusion zones for the telecommunications site. We would also suggest that it is highlighted to the operators that they should also be able to produce these plans to landowners or their agents upon request. This would mean more</p>



people will be involved in assisting of the monitoring of EMF compliance and if there are breaches, it is more likely that they will be uncovered and reported to OFCOM.

We agree with the proposed guidance for enforcement of EMF compliance. Some of the enforcement actions are severe enough to act as a deterrent for non-compliance.