
Sent: 13/10/2020 2:57:43 PM
Subject: DA 2020/0661 - Optus Tower
Attachments: 201013 Sophie Stack - Submission.docx;

Dear Carly

Would you kindly upload my further submission in the matter of DA2020/0661 as attached.

Many thanks for your assistance
Sophie Stack

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Dear Northern Beaches Local Planning Panel

I wish to make the following points.

1. Concerns re: current public exposure limits for cell towers

I have perused information published on an Australia Government website and wish to point out concerns that it directly raises, in relation to the electromagnetic radiation Public Exposure Limits for cell towers that apply in this country. (Note that ARPANSA are the body that govern Australia's EME and EMR limits. ARPANSA's information is mandated by ICNIRP).

Parliament of Australia website – Objections to the ICNIRP Guidelines

On the Parliament of Australia website www.aph.gov there is a page titled "Chapter 4 - Australian standard on radiofrequency fields exposure levels". This page may be found at this link: https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Environment_and_Communications/Completed_inquiries/1999-02/emr/report/c04.

On this page there is a section called "Objections to the ICNIRP Guidelines". At point 4.82, a representative involved in setting the current standards recalls how the existing Public Exposure Limits were developed. It reads as follows:

4.82 Mr Les Dalton concurred when he related how the existing radiofrequency standard was developed:

We had a CSIRO representative on the standard setting committee. ... He argued for a maximum public exposure of 40 microwatts per square centimetre. The industry eventually insisted that it be 100. But then they learned that some broadcasting antennas, and particularly one in Adelaide, were well above that. So what happened was that they made it 200. That is the reason we have 200 microwatts per square centimetre, today, for public exposure. It had little to do with science.
[50]

ARPANSA – Update re: 2020 Public Exposure Limits

The ARPANSA website confirms that the current Public Exposure Limits in place are as follows:

What are the public exposure limits?

There are various exposure limits in the ARPANSA RF Standard for various situations. The exposure limits are frequency dependent meaning there are different limits for different sources of RF EME depending on what RF frequency a particular source is using. For telecommunications infrastructure such as mobile phone base stations the limits for whole body exposure are expressed in a quantity called 'power density' and for the general public they range from 2 to 10 watts per square meter (W/m²) depending on the operating frequency.

The relevant page may be found at this link: <https://www.arpansa.gov.au/regulation-and-licensing/regulatory-publications/radiation-protection-series/codes-and-standards-1>

From this published information it appears that:

When the standards were originally set:

- a CSIRO representative argued that the Public Exposure Limits should be 400 milliwatts/m² however
- the Industry succeeded – apparently with little reference to science - in having the Public Exposure Limit set at 2,000 milliwatt/m² and

and that as of 2020

- our Public Exposure Limit has been increased to 10,000 milliwatt/m².

It appears that the current Public Exposure Limit is 5 times what it was originally, and 25 times the maximum limit that a CSIRO representative argued for.

2. Concerns re: responses provided by the Urbis Planning representative re: reasons for not adhering to the NSW Precautionary Principle

1. I refer to a response provided by the Urbis Planning representative at the NBLPP meeting on Wednesday 7 October when asked by the panel whether he had any response in relation to the fact that the proposed site does not comply with the NSW precautionary principle. John Mills's initial response was

"The policy in question is over 25 years old."

Given the changes that have occurred in the public exposure limits over the last 25 years as described above, logic would suggest that the precautionary distance that applied 25 years ago should be observed as a minimum precaution today.

2. I refer to a further response provided by the Urbis Planning representative

"There are about 10 schools on the northern beaches that have cell facilities in the actual school."

I understand that the arrangement for a cell facility to be installed on school grounds only comes about if the school decides to enter into an arrangement where they accommodate the cell facility in return for rent. While there are cell facilities installed in the grounds of schools on the northern beaches, I believe it is very lame to use this fact to bolster the current case - which involves a school that clearly does not consent to its students being exposed at close range, to the current Public Exposure Limits.

I am very concerned about the Public Exposure Limits that the Northern Beaches Local Planning Panel may be recommending that Curl Curl residents and primary school children be exposed to.

Sophie Stack