



## Centre for International Research on Communication and Information Technologies

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20 June 2000

Secretary  
Senate Environment, Communications, Information  
Technology and the Arts References Committee  
S1.57 Parliament House  
CANBERRA ACT 2600

Dear Sir/Madam

The following submission is made pursuant to the Committee's Electro-magnetic Inquiry.

My reference is "Telecommunications Facilities Strategy" as adopted by the Banyule City Council on 21 February 2000. This strategy is a public document and copies may be obtained from Ms Vivien Williamson, Strategic Planning Coordinator, City Development, Banyule City Council, PO Box 51, Ivanhoe 3079.

I bring the following matters to your attention not as representing a primary source of information concerning the possible adverse impact of electro-magnetic radiation from telecommunications equipment, but rather because of the manner in which it portrays genuine community concern about the issue. Sections 3.5 and 3.6 of the strategy document state:

### **3.5 Public Health**

#### **3.5.1 Community Issues**

- Children, the infirm and others in confined spaces could be unwittingly exposed to electromagnetic radiation (EMR) that may be hazardous to their long-term health.

#### **3.5.2 Council Policy**

- Adoption of the principle of "prudent avoidance", requiring that telecommunications facilities which emit radio frequencies are only located in areas that minimise the risk of potentially vulnerable people being excessively exposed to electromagnetic radiation (EMR).
- Council prefers the location of telecommunications facilities that emit EMR within commercial or industrial areas remote from public use.
- Council planning permits and leasing agreements will include a standard condition requiring (that) the EMR output from facilities will at all times be lower than the then accepted standard.

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- Council will maintain a record of all sites and relevant carriers for which it –
    - receives a planning permit application;
    - enters into a lease agreement; or
    - receives a notice to install a low-impact facility (pursuant to Clause 17, Schedule of the 1997 Telecommunications Act).

### **3.5.3 Guidelines**

- *Locate facilities that emit EMR in areas that are remote from sensitive uses such as child care centres, preschools, schools, hospitals, nursing homes, maternal and child health centres or other places where people congregate for periods of time.*
- *Replace existing telecommunications infrastructure upon the inception of new technologies that produce and require less EMR.*

## **3.6 Cumulative Impact**

### **3.6.1 Community Issues**

- As the overall number of facilities in a given locality increases (such as multiple mobile phone towers on the one site, new items of street furniture introduced adjacent to existing non- telecommunications ones, and retention of defunct infrastructure), the visual amenity of the area is degraded.
- Multiple telecommunications transmitters concentrated in one location could cumulatively increase the overall level of EMR exposure for nearby residents to an unsatisfactory level.

### **3.6.2 Council Policy**

- Council recognises that a concentration of facilities which when taken individually do not emit high levels of EMR, may cumulatively emit EMR of a much higher level.
- Co-location does not involve replication of existing facilities on the one site (eg. two mobile phone towers located side by side on the one site), but rather rationalisation with existing infrastructure so as to minimise the visual impact of additional facilities.
- Redundant infrastructure must be either utilised by another carrier or removed altogether.

### **3.6.3 Guidelines**

- *Provide independent comprehensive details of type and the highest possible EMR for all facilities within 50m of a proposed installation, along with the cumulative highest possible EMR outputs that would result if the proposed facility were operational.*

I bring this information to the attention of the Committee in the hope that it may more favourably consider recommendations that limit:

- (i) the siting of EMR facilities where there may be hazard to the long-term health of children, the infirm and others in confined spaces, based upon the principle of “prudent avoidance” in the absence of more definitive data prescribing the situation one way or another, and
- (ii) the likely increased potential for adverse impact to health arising from the cumulative impact of multiple telecommunications transmitters in a given locality, despite the appreciation that individually such EMR may be considered to fall within acceptable limits.

Yours faithfully

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