



Europe

CONTRIBUTION TO THE SECOND STAGE CONSULTATION ON THE PROTECTION OF WORKERS FROM THE RISKS RELATED TO EXPOSURE TO ELECTROMAGNETIC FIELDS

5th July 2010

2.2 Do you consider that a Community initiative is the best way to ensure a high standard of protection of workers exposed to electromagnetic fields?

The strength of a Community initiative should be to provide a harmonised system of protection. The GSMA would be concerned should member states adopt measures that are more restrictive than the proposed Directive.

With respect to non-public access areas, the mobile communications industry follows national legislation or, where this does not exist, generally applies the ICNIRP occupational exposure guidelines as the basis for designing and operating base stations.

We would support the use of the ICNIRP guidelines for occupational exposure levels within the scope of the Directive. A workable directive has to be based upon a practical approach with guidance for specific industries.

2.5 Should a possible future EU initiative cover the long-term effects of workers' occupational exposure to electromagnetic fields?

At the present time there is neither consistent scientific evidence of long-term effects nor an accepted mechanism to propose how such effects might occur. The ICNIRP has considered the possibility of long-term effects but concluded that they were not established and, therefore, could not form the basis of exposure limit values.

In communicating the application of the Directive the Commission should be careful not to undermine confidence in the high-level of protection offered by the ICNIRP limits against established health risks of RF exposure by unduly focussing on unproven and unspecified risks.

4.3 Exposure limit values

The Zone 3 statement refers to frequencies "above" rather than "below" 100 kHz. This appears to be a simple typographic error. The final paragraph in 4.3 also supports the understanding that the zoning is applicable to 0 to 100 kHz only. We agree with the Commission's suggested approach to maintain the provisions of the Directive for frequencies

above 100 kHz.

It is not clear whether the very last statement of the paragraph ("*... all the limits would be expressed in the same units, for directly measurable quantities*"), intend to apply also to RF exposures. We suggest that this should not be the case. We note that although basic restrictions for RF exposures are expressed in SAR¹, which is not immediately measurable, standards bodies and national governments have already developed compliance standards based on simple and directly applicable whole-body SAR calculation^{2,3} and/or measurements of RF field exposure. In addition, international standards are near completion that address the evaluation of both localized and whole-body SAR⁴.

It should be made clear whether the Directive applies to workers who are exposed to RF from radio installations or radio products. Generally RF compliance for products used close to the body will be based on SAR and addressed through the RTT&E Directive. Compliance for sources used away from the body may be determined by SAR or RF measurement, or calculation.

4.6 Due flexibility in a controlled working environment

We welcome the Commission view that exposure limits should be enforced taking into account the duration of exposure (e.g. averaging over 6 minutes for RF fields), in line with ICNIRP guidelines and recommendation.

We would recommend that, consistent with normal risk assessment practices, wording is included to encompass transitory exposure (such as for access near antennas by emergency service personnel).

4.7 Medical surveillance

We welcome the Commission's proposal to set up an appropriate working party to develop guidance on medical surveillance. We also stress the importance that this guidance is based on a sound scientific approach, such as SCENIHR and other similar competent bodies (e.g., HPA⁵, HCN⁶, Nordic radiation safety authorities⁷, COMAR⁸ and the Finnish Institute of Occupational Health).

Based on the current scientific consensus there is no evidence basis to define a routine medical surveillance system for RF exposures. We suggest that the Commission should clarify that medical surveillance is only needed in the event of suspected RF over-exposure. To be clear, "routine medical surveillance" is not necessary unless occupational limits are exceeded (some Member States introduced this additional requirement during the earliest stage of the transposition into national law of the former version of the Directive).

It has been established that below the ICNIRP level threshold there are no known adverse health effects, so we propose that the obligation for medical surveillance only applies after suspected exposure above ICNIRP occupational levels, and following the completion of an

¹ Specific Absorption Rate

² Methodical guideline number: 29015/2009 issued by Chief Hygienist of Czech Republic

³ Professional Associations (BG) Guidelines for occupational Health and Safety at Work BGR B11, section 3.5.4

⁴ IEC 62232 CDV Determination of RF field strength and SAR in the vicinity of radiocommunication base stations for the purpose of evaluating human exposure

⁵ Health Protection Agency (UK)

⁶ Health Council of the Netherlands

⁷ www.ssm.se; www.stralevernet.no; www.ssi.dk; www.gr.is; www.stuk.fi

⁸ Medical Aspects Of Radiofrequency Radiation Overexposure, IEEE Committee on Man and Radiation (COMAR), Health Physics, 82(3):387-391, March 2002.

incident investigation. This method could apply pending the findings of the newly established committee.

4.9 Non-binding measures

To help companies comply with the Directive, guidance is necessary. Non-binding measures are crucial in this respect, such as sector specific guidance and exchange of good practices. Guidance for management of RF exposures could also be helpful provided that such guidance is aligned with current scientific understanding.

5. Questions to the social partners

GSMA would like to confirm our willingness to participate in future negotiation on this topic.