



*Living more safely with  
electromagnetic radiation*

EMR Australia PL  
ABN 82 104 370 658  
PO Box 347  
Sylvania Southgate NSW 2224  
02 9576 1772  
[contact@emraustralia.com.au](mailto:contact@emraustralia.com.au)  
[www.emraustralia.com.au](http://www.emraustralia.com.au)

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Smart Meter Taskforce  
Resources and Energy  
NSW Trade and Investment  
GPO Box 3889  
Sydney NSW 2001

Dear Sir/Madam

**NSW Smart Meter Taskforce Discussion Paper**

Thank you for the opportunity to comment on the above paper.

The term ‘smart meter’ is a euphemism for a meter that transmits information using radiofrequency (RF) radiation. The Discussion Paper does not address the risk of exposing people to RF radiation, which has been blamed for adverse symptoms experienced by people, that coincide with the activation of smart meter networks in their neighbourhoods.

The symptoms reported by people who have had ‘smart’ meters installed on their homes are consistent with those reported in the scientific literature from exposure to RF radiation.

The Australian RF standard does not protect the public from harmful effects of radiation from ‘smart’ meters. It has been designed to protect against instantaneous, acute, heating effects and not the continuous, low-level, long-term biological effects that are of concern with ‘smart’ meters. It is relevant that many electricity meters are installed on bedroom walls, often in close proximity to the bed, and RF signals travel through walls, affecting people as they sleep.<sup>1</sup>

It is relevant that ARPANSA does not claim that compliance with its standard ensures ‘safety’.

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<sup>1</sup> ARPANSA RP3 “Maximum exposure levels to radiofrequency fields – 3 kHz to 300 GHz” Radiation Protection Series 2002.

Furthermore, the Discussion Paper does not address concerns that have been raised by the rollout of the technology in other parts of Australia and elsewhere in the world. These include:

- increased costs of electricity
- fire risks
- ability of utilities to remotely control household electricity
- privacy and security of information about household activities.

It is premature to consider installing ‘smart’ meter networks in NSW until these issues have been addressed.

In regards to the questions in the Discussion Paper, EMR Australia offers the following comments.

1. *What are the most important benefits smart meters can provide to more efficiently and effectively manage the consumption of electricity?*

This question is loaded. The Task Force needs to weigh the benefits of using ‘smart’ meter technology against the risks.

Has the Task Force considered the risks and, if so, where is its report?

2. *Are there other tools or management options that should be considered and implemented together with smart meters or as an alternative?*

‘Smart’ meters are not the best option for managing consumption of electricity. Reduced consumption of electricity can better be achieved in other ways, including consumer and industry education and low-energy appliances.

3. *How can the level of understanding about smart meter technology be increased in the community, and who are the key players who can contribute to this understanding?*

It is important for consumers to understand the fact that ‘smart’ meters networks generally operate using RF radiation and to be aware that people who have had ‘smart’ meters installed often report adverse symptoms coinciding with the operation of the meters.

4. *What will encourage the community to respond to the “price signals” that smart meters can deliver?*

‘Price signals’ of ‘smart’ meter technology are less important than public health and safety.

5. *Are the principles that the Task Force will recommend to the NSW Government appropriate?*

No

6. *Are there any additional policy principles that the Task Force should consider recommending to the NSW Government?*

The Task Force needs to address the following principles:

- The problems (above) that have accompanied the roll-out of ‘smart’ meter technology elsewhere should be addressed before the technology is rolled out in NSW.
- Consumers should not be exposed to potentially-harmful RF radiation from electricity meters.
- If the Government supports or mandates the rollout of ‘smart’ meter technology, it is liable for any problems caused by ‘smart’ meters.
- Electricity networks may face class action networks if ‘smart’ meters cause problems for consumers.

7. *Is the Task Force correct to recommend a market-led rollout of smart meters with a level of Government support as the best possible option?*

No. The Task Force should not recommend a roll-out of ‘smart’ meter technology until it has been proven safe.

If the Government supports the roll-out of ‘smart’ meters, it may be liable for problems caused by the technology.

8. *What is the appropriate role of Government in the introduction of smart meters to ensure the most successful outcome for the electricity consumers?*

Before any rollout is considered, the Government must:

- ensure that ‘smart’ meters are proven safe – as opposed to simply complying with the ARPANSA standard
- address the issues raised earlier in this submission.

The Government must consider its liability in the event that ‘smart’ meter technology is proven harmful in any way.

9. *What interventions should the Task Force consider recommending to minimise potential adverse impacts on vulnerable customers?*

The Task Force should advise against the introduction of ‘smart’ meter technology until it has been proven safe and the concerns (above) have been addressed.

‘Smart’ meters that transmit signals by wire are likely to be less harmful than those which transmit signals by RF radiation.

10. *The Task Force recommends that the wider introduction of smart meters need not automatically be linked to the introduction of a mandatory retail or network time of use prices in NSW. Will this minimise adverse social impacts or will it remove an important pricing reform available to consumers to manage their electricity use?*

With education, consumers can manage their electricity use without the use of 'smart' meters.

*11. How could the benefits for consumers of the wider introduction of smart meters be quantified?*

The Task Force must consider how the benefits can be weighed against the long-term risks from the use of 'smart' meter technology.

*12. Can a mandated rollout strike the right balance between urgent reforms that may reduce the pressure of peak demand while protecting consumers from regulatory charges for meter installation?*

A mandated rollout is not the only way to reduce the pressure on peak demand. It is more appropriate to educate consumers about how and why to do this.

A mandated rollout would remove consumer choice and is likely to be met with resentment and opposition as has occurred in Victoria and elsewhere in the world.

In the event of a mandated roll-out, the Government must consider its legal liability for any problems caused by the technology.

*13. Is there sufficient community awareness/confidence in smart meters to facilitate a market-based approach?*

The community cannot and will not have confidence in 'smart' meter technology till the problems identified above have been addressed.

The Discussion Paper claims that a benefit of a market-led approach is the development of 'innovative electricity products'. This is a euphemism for appliances that will use RF radiation to connect to the 'smart' meter, thereby creating a RF network within the home and exposing occupants to additional radiation. This is contrary to the precautionary principles in the ARPANSA standard.

*14. Would a slow take-up undermine any impact smart meters would have on the cost of supply?*

Public health must take precedence over cost-of-supply issues.

I trust that the Task Force will take these comments into consideration and look forward to its response to the issues we have raised.

Yours faithfully

Lyn McLean  
Managing Director