

To: ICASA
350 Witch Hazel Avenue
Eco Point Office Park
Eco Park, Centurion Pretoria

Attention: Mr. Manyapelo Richard Makgotlho

By email: rmakgotlho@icasa.org.za

From: **Wendy Newstadt**

Re: **Representation to ICASA regarding PURSUANT TO SECTION 34 (2) AND 34 (5) OF THE ELECTRONIC COMMUNICATIONS ACT 2005, (ACT NO. 36 OF 2005) HEREBY ISSUES A NOTICE REGARDING THE DRAFT NATIONAL RADIO FREQUENCY PLAN 2021 FOR PUBLIC CONSULTATION**

Date: 27 August 2021

I note with concern the proposed policy and policy direction on the deployment of electronic communications network and spectrums in reference to the Draft National Radio Frequency Plan 2021, for reasons noted below:

- The Draft national radio Frequency Plan has not been made sufficiently user friendly for the public to understand its technical implications and effects to health and environmental safety.
- There has been insufficient testing done to determine the cumulative effects of wireless radiation to ourselves and our environment, despite scientists warning for decades that increased wireless radiation is a health risk on many biological levels. The risk factors concerning the adverse impacts and effects of high frequency electromagnetic radiation on human health and the environment are documented in various scientific publications as well as peer reviewed articles eg. <https://www.emfscientist.org/>
According to the above article, "Wireless communication technologies are rapidly becoming an integral part of every economic sector. But there is a rapidly growing body of scientific evidence of harm to people, plants, animals, and microbes caused by exposure to these technologies.
- It is important to make clear that this Draft plan includes the emission of a potentially hazardous substance, namely non-ionising radiofrequency radiation. The National Department of Health does not dispute that In May 2011 the International Agency for Research on Cancer ("**IARC**") evaluated cancer risks from radiofrequency radiation. Human epidemiological studies gave evidence of increased risk for glioma and acoustic neuroma. The IARC classified radiofrequency radiation as a Group 2B carcinogen, meaning that it is a possible human carcinogen. This classification is not disputed by the National Department of Health. It is common cause that 5G technology, with its emissions of higher frequency non-ionising electromagnetic radiation, has adverse impacts on human health and the environment.
- There has been virtually no public debate or public participation regarding the national decision to roll out 5G, and the rollout seems to have overruled the usual rigour of municipal by-laws regarding cell tower erection, densification and placement.

- The construction and operation of high speed electronic communications networks and electronic communications facilities should be exercised in a manner that gives due regard to the rights of all affected persons in a way that ensures an environment that is not harmful to human and environmental health. In particular, these masts and infrastructures should not be allowed in close proximity to schools, homes, endangering children and all living species alike.
- The radiation impacts of satellites also need to be clearly monitored. Cumulative effects of expanded and overlapping frequency spectrums need to be scientifically carefully and transparently measured (for public verification) in order to be determined and evidenced safe enough for human and environmental health prior to being rolled out. This information has to be in the public domain so that we are informed of radiation levels and safety limits and we are granted the right to object if safe radiation limits are transgressed.
- According to the World Health Organization, the International EMF Project with the International Advisory Committee (IAC) documented the following at the 25th Anniversary of the International EMF Project in Geneva, Switzerland on 8,9 and 10 June 2021.
See https://www.emfsa.co.za/wp-content/uploads/2021/06/World_Health_Organization_International.pdf
“A number of individuals have reported a variety of health problems that they relate to electrohypersensitivity (EHS) due to EMF (Electromagnetic frequency) exposure at home and in the workplace. Rulings have acknowledged that EMF-related health issues could result in workplace-related accidents or illness. Different EM spectrums can bring about different symptoms. Radiofrequency (RF) electromagnetic fields (RF-EMF) were shown to induce oxidative stress in cell cultures and in animal studies. This can lead to mtDNA damage as mitochondrial DNA is particularly vulnerable to reactive oxygen species (ROS). Besides the general effect on genome stability, affected organs include the brain and reproductive tract leading to impaired cognitive functions and decreasing fertility “.
- In South Africa we follow the guidelines of ICNIRP which permits very high radiation exposure levels. It must be noted that FCC and ICNIRP limits were not developed to protect ourselves or flora or fauna. Wireless radiation “safety” limits for trees, plants, birds and bees simply do not exist. With the increasing threat of climate change catastrophic events, this should be monitored very closely. No international authority with expertise in science, biology or safety has ever acted to review research and set safety limits for birds, bees, trees and wildlife. It is a major gap in accountability. See <https://ehtrust.org/research-studies-on-impacts-to-the-environment-from-wireless-trees-plants-pollinators-birds-and-wildlife/?fbclid=IwAR1aqVzsZNX5AhrTPpjzHJBeZt3fY01sScoi27fElkjd9hVxC7t7jLNWls4>
- In closing, any adjustments to frequency spectrums need to focus on public and environmental health and safety first and foremost. A precautionary approach to wireless technology running wild must be followed with calculations documented by independent scientific researchers along legal guidelines and results should be open for public access and debate.