Dear Contributor,

Thank you for participating in the public consultation of the ICNIRP draft guidelines.

Please note that it is important that ICNIRP understands exactly the points that you are making. To facilitate our task and avoid misunderstandings, please:

* be concise
* be precise
* provide supporting evidence (reference to publication, etc.) if available and helpful.

**How to complete the comments table:**

Please use 1 row per comment. If required, please add extra rows to the table.

This response document asks you to provide your ‘comment’, your ‘proposed change’, and the ‘context’ to this comment and proposed change. What is meant by these is the following:

**Comment :** A brief statement describing the issue that you have identified (and that you would like ICNIRP to take into account in the final version of the guidelines).

**Proposed Change:** A brief statement describing how you would like the document changed to account for this issue.

**Context:** A brief statement identifying relevant documents in support of your comment and proposed change.

**Please, provide your details below as per the online form and the provision of the privacy policy**

|  |  |  |
| --- | --- | --- |
| Last name, first name: STORCH, Daniel | Email address: Your email address. | Affiliation (if relevant): Your affiliation |
| If you are providing these comments officially **on behalf** of an organization/company, please name this here: Federal Office of Public Health, Switzerland | | |
| I hereby agree that, for the purpose of transparency, **my identity (last and first names, affiliation and organization where relevant) will be displayed** on the ICNIRP website after the consultation phase along with my comments.  I want my comments to be displayed anonymously. | | |

|  | **Document**  **(Guidelines, App A,**  **App B)** | **Line Number**  **#** | **Type of comment (General/ Technical/ Editorial)** | **Comment. Proposed change. Context.** |
| --- | --- | --- | --- | --- |
| **1** | Guidelines | Line number | General | From our point of view it is not justified that only thermal effects are considered, as the IARC classification of 2B shows that there is epidemiological evidence that high frequency radiation can be carcinogenic. It would be useful if the ICNIRP guidelines could not only recommend these reference levels and basic restrictions, but if precautionary values were also proposed which take this scientific uncertainty into account and would be based on the principle of economic viability and technical feasibility.  Insert your proposed change.  Explain the context of your comment. |
| **2** | Guidelines | 95 | General | We greatly appreciate that the new ICNIRP guidelines applies the general public limits for the fetus  Insert your proposed change.  Explain the context of your comment. |
| **3** | Guidelines | 322 | Technical | The current guidelines treat RF EMF exposure that results in local temperatures of 41°C or greater as potentially harmful. We claim that there is absolutely no safety factor between the temperature assumption of ICNIRP (41°) and the potentially harmful value.  We propose a limit of 40°C in local temperature as potentially harmful to implement a safety factor  Explain the context of your comment. |
| **4** | Guidelines | 661 | General | The SAR value for small stature person such as children can be underestimated.  The reference level for children must be changed  In other fields, such as in optical radiation, correction factors for children are applied. |
| **5** | Document ? | Line number | Type of comment | Insert your comment.  Insert your proposed change.  Explain the context of your comment. |
| **6** | Document ? | Line number | Type of comment | Insert your comment.  Insert your proposed change.  Explain the context of your comment. |
| Continue numbering | Document ? | Line number | Type of comment | Insert your comment.  Insert your proposed change.  Explain the context of your comment. |

Add further rows if needed. For this copy the above row.

And paste it here.