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**

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| --- | --- | --- |
| Last name, first name: Reichenbach Alexander | Email address: Your email address. | Affiliation (if relevant): Swiss Federal Office for the Environment FOEN |
| If you are providing these comments officially **on behalf** of an organization/company, please name this here: Swiss Federal Office for the Environment | | |
| 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 | general | General | The approach taken by ICNIRP in classifying the scientific evidence for health effects of RF-EMF appears to be rather coarse. It is a black&white scheme: Only dangerous effects which are without any doubt caused by the EMF exposure, whose interaction mechanism is fully understood and which are not in contradiction to other results are accepted as the basis for deriving exposure limits. All other effects which do not reach this very high level of evidence are dismissed. This leaves the false impression that no concern is justified as long as the recommended exposure limits are respected. This narrow approach will most probably be rejected by the public which is well aware that there is a continuum of evidence and which expects guidance also regarding findings which have not (yet) reached the very high level of evidence postulated in the present version of the guidelines. We would like to draw your attention to other evidence rating systems which are more differentiated and in our view represent the body of scientific knowledge much better than the black/white scheme applied by ICNIRP, e.g. schemes applied in the GRADE-system or by IARC in classifying the evidence for carcinogenicity of an agent as “proven, probable, possible, equivocal”.  Insert your proposed change.  Explain the context of your comment. |
| **2** | Guidelines | 101 to 105 | General | The expression „precaution“ is misleading in this context and should be generally omitted throughout the guideline. It relates to the “Precautionary principle” which asks for actions when scientific knowledge in incomplete or missing. Yet it is exactly this realm of incomplete science which ICNIRP explicitly excludes from their final deliberations. Any statement about precautionary measures, whether affirmative or denying is therefore beyond the scope of the guidelines and should be omitted. Governments who want to apply a precautionary approach for technical, political or other reasons must not be discouraged to do so by arguments derived from a narrow scientific basis.  Proposed changes: line 101: replace „precaution“ by „conservativeness“  Lines 103 to 105: Delete the sentence “ICNIRP considers…….to make additional precautionary measures unnecessary” because it is beyond the scope of the guideline.  Explain the context of your comment. |
| **3** | Guidelines | 682 (Table 4) | General | We suggest to indicate reference levels for the electric and magnetic field strength also for the frequency range 2-300 GHz. In the draft there is a reference level only for the incident plane wave power density. This suggestion originates from practical considerations towards applying the guideline, specifically in environmental protection. In a typical setting there are fields in a broad frequency range, for mobile phone radiation e.g. from 800 MHz to 3.5 GHz (and higher bands in the future). Exposure is measured by instrumentation which usually captures the electric field, not the power density directly. With the reference levels proposed in table 4 one would be forced to change from one field metric to another below and above the frequency of 2 GHz respectively. This would be impractical and give rise to confusion and misunderstanding.  Insert your proposed change.  Explain the context of your comment. |
| **4** | Guidelines | Whole document | Type of comment | The newly introduced expressions „transmitted power density“ and “transmitted energy density“ are not self-explaining and may give rise to confusion. One intuitively associates with this notion the RF-power or the RF energy emitted by a transmitter, i.e. an antenna. According to the definition given in the guideline the terms mean something completely different: power or energy absorbed by the human skin of a given area.  Proposed change: Replace „transmitted power density“ by „absorbed power density“ and „transmitted energy density“ by „absorbed energy density“ throughout the documents.  Explain the context of your comment. |
| **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.

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