Comment on the ICNIRP Policy Draft of July 11, 2018

The Round Table Amateur Radio (RTA) is an association of most German amateur radio clubs. The RTA sees its work as a coordinator of lobbying for amateur radio in politics. The RTA was founded on June 11, 1994, at the suggestion of the former Federal Post Office Ministry to have a single point of contact.

The RTA welcomes the present draft. Among other things, it states that the limit values for the E- and H-field in the short-wave range, which are relevant for personal safety, have been raised compared to the previously valid directive.

In Germany, the statutory regulation applies on the verification procedure for limitation of electromagnetic fields (BEMFV), according to which the operator of an amateur radio station must provide proof that a sufficient safety distance from persons to the antenna systems is ensured. In unfavorable cases with densely constructed urban areas, this safety distance can lead to a limitation of the transmission power.

Using the “Reference Levels” given in Table 4 (pages 16–17) this results in a significant improvement. This is also in line with the experience of amateur radio operators, who have not been able to detect any adverse effects of the electromagnetic fields generated on human health in their environment in the past. Obviously, the previous limits were too conservative.

The recalculation of the limit values is therefore rated as positive by the RTA.