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SMART METERING PROGRAMME:

FOUNDATION SMART MARKET

Consultation reference: URN13D/106

Response on behalf of Electrosensitivity UK

The following response concerns mainly questions 1 and 2, especially on Licence Condition 3 (No Backward Step) and Potential Licence Condition 4 (Continue Remote Meter Reads).

1. Option to opt out of wireless radiation

The consultation document does not appear to include any references to the option to opt out of wireless smart meters for health and other reasons, as announced in the House of Commons on 29th November 2011. Clearer provisions are needed for people choosing the option to opt-out as regards Licence Condition 3 and Proposed Licence Condition 4 for the use of wireless smart meters for both WANs and HANs.

- (a) Licence Condition 3 (No Backward Step) needs to be revised with specific provision for consumers choosing the option to opt out of wireless smart meters in any new property or from any new supplier or if the consumer becomes aware of the health issues.
- (b) The option to opt out of wireless smart meters needs to be made known to consumer by the supplier. It is reported at present that some suppliers are not making this provision known to consumers in their literature and websites and thus consumers are not being given a genuine option.
- (c) There needs to be provision for consumers to exercise their option to opt out of wireless smart meters at any point within a contract with a supplier, including Potential Licence Condition 4 (Continue Remote Meter Reads), even if they or someone in the consumer's household has not become ill directly from the wireless smart meter.
- (d) There needs to be provision for consumers to exercise their option to opt out of all neighbouring wireless smart meters at any point, including Potential Licence Condition 4 (Continue Remote Meter Reads), if they or someone in the consumer's household becomes ill from a neighbour's wireless smart meter, especially in multiple occupancy buildings, since this is a well known problem where banks of meters have been installed adjacent to each other for a block of flats.

2. Wireless radio frequency radiation classified as a 2B cancer agent

The consultation document does not appear to include an assessment of the health dangers of the radiation suggested for many of the proposed smart meter WANs and HANs. Since wireless is now classified as a 2B cancer agent, and may in the foreseeable future be reclassified as 2A or 1, there are implications for a consumer irradiated by the supplier, as well as for the supplier as the agent responsible for irradiating the consumer.

- (a) The consumer should be alerted to the fact that many doctors advise ill people with weakened immune systems, children, the elderly, and especially those already sensitive to electromagnetic fields and radiation, to avoid exposure to electromagnetic fields and radiation.
- (b) The supplier, insofar as it is irradiating its customers with a class 2B cancer agent on a long-term basis, should be required to explain to the consumer the known health risks and how to reduce them or how to opt out if the consumer wishes.
- (c) Consumers should be warned that many employers are required or expected to avoid exposing employees to class 1, 2A and 2B carcinogens. This could include consumers as householders employing other people to work on their property. Thus the supplier or consumer or both are liable for injuries from the radiation and some insurers no longer cover the known health risks from electromagnetic exposure.

3. Financial provision and liability statement and risk assessment by the supplier for those made ill by wireless smart meters

The consultation document does not appear to include any allocation of financial and legal liability for consumers made ill by the supplier's irradiation devices, such as a WAN and HAN wireless smart meter.

- (a) There needs to be provision for the costs incurred and appropriate reparation to be made if a consumer or someone in his/her household becomes ill from a wireless smart meter either on his/property or on a nearby property, and a clear statement of who will be liable for these costs. Costs may include shielding and protecting the living quarters from the radiation, removal costs to new housing with lower levels of radiation, long-term provision for lack of income if persons are made medically unable to work, in addition to any costs for medical treatment especially if it time off work is needed.
- (b) The risk assessment for each wireless smart meter, both WAN and HAN, on a property where children are or may be present should be required to state how its use relates to current UK government advice that children should not use devices like mobile phones, which also use class 2B pulsed radio frequency radiation, except in emergencies.