12.03.2018

Attn: 2018 Water Price Review Essential Services Commission Level 37, 2 Lonsdale Street Melbourne VIC 3000 By email: water@esc.vic.gov.au

To Whom It May Concern

Coliban Water 2018 price review

Thank you for the opportunity to submit feedback to the above review.

Stop Smart Meters Australia (SSMA) is a volunteer-based consumer advocacy group which incorporated as an Association in April 2013 in response to widespread community objection to the Victorian State Government mandated rollout of electricity smart meters and infrastructure. Paramount within our legal purposes is to provide support and assistance to people who are opposed to smart meters on the grounds of health, privacy, security, safety and/or costs.

Members and followers of Stop Smart Meters Australia (SSMA) have expressed alarm in regard to the costs and benefits of Coliban Water's ongoing commitment to roll out smart meters across its region.

Health costs due to harmful radiation from smart meters

The deployment by utilities of wireless smart meters and smart meter infrastructure emitting electromagnetic fields (EMF) has harmed people around the world. In written evidence provided to the UK Parliament's Energy and Climate Change Committee, it was stated that more than 10,000 health-related complaints were submitted to the California Public Utilities Commission alone in consequence of the installation of electricity smart meters; this included personal testimonies from medical doctors, psychotherapists and nurses, regarding their own symptoms (Stop Smart Meters! 2013).

SSMA is in receipt of in excess of 400 (unsolicited) reports from Victorians alleging a variety of adverse symptoms, some of which have been life-threatening, as a result of exposure to smart meters' pulsed microwave emissions. This cohort is viewed as being the 'tip of the iceberg'.

The majority of the population and medical fraternity in Australia have no previous experience, nor training, in identifying biological changes as a result of increased radiation exposure and are unlikely to link the rollout of smart meter technology with the symptoms which have been triggered. The emissions from smart meters appear to have caused the exacerbation of existing symptoms, as well as triggering new symptoms in parts of the population who had not previously exhibited sensitivities to wireless technology.

In some instances, the impact on people's health, as a result of exposure to smart meter emissions, has been profound, resulting in high personal costs (loss of career, loss of income, loss of place in society, loss of access to public facilities, loss of friends and family) for these people and their families as well as costs to the wider community. A number of our members and followers have been forced to move home and, in some cases, families have been split up (where one member is affected by exposure to emissions from smart meters). Others have resorted to outlaying considerable sums of money, in the tens of thousands of dollars, on electromagnetic field (EMF) shielding products for their homes in a bid to reduce emissions from smart meters; others are no longer able to access parts of their homes or gardens. People have been harmed even in instances where they don't have their own transmitting smart meter, as a result of exposure to emissions from a neighbour's smart meter.

A PubMed-listed, peer-reviewed study, entitled *Self-reporting of Symptom Development from Exposure to Radiofrequency Fields of Wireless Smart Meters in Victoria, Australia: A Case Series*, offers the hypothesis that "some people can develop symptoms from exposure to the radiofrequency fields of wireless smart meters" (Lamech 2014, p. 38). The study's conclusions point to the "possibility that smart meters may have unique characteristics that lower people's threshold for symptom development." The most common symptoms were insomnia, headaches, tinnitus, fatigue and cognitive disturbances.

The American Academy of Environmental Medicine (AAEM) has endorsed the report, stating, "It is a well documented 92 case series that is scientifically valid. It clearly demonstrates adverse health effects in the human population from smart meter emissions" (AAEM 2014).

Although emissions from wireless smart meters have been shown to be a fraction of the limits outlined in Australia's radiofrequency (RF) standard, which is set by the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA), this needs to be viewed both in the context of limits set elsewhere in the world and in light of the theory underlying current RF standards and guidelines.

Forty percent of the world's population has the benefit of higher levels of protection. Radiofrequency exposure standards and guidelines in place in these jurisdictions are

ten to hundreds, and even thousands, of times more rigorous than Australia's standard, which is based on 1998 ICNIRP guidelines (Jamieson 2014, p. 4).

In addition to the weakness of Australia's RF standard, by comparison to a number of other standards and guidelines elsewhere, many scientists view the theory underpinning current radiofrequency standards as being deeply flawed. As of November 9, 2017, 236 EMF scientists from 41 nations had signed an International EMF Scientist Appeal calling for greater health protection on electromagnetic fields exposure (International EMF Scientist Appeal 2017). Smart meters receive specific mention in the appeal. The appeal states that:

"Numerous recent scientific publications have shown that EMF affects living organisms at levels well below most international and national guidelines. Effects include increased cancer risk, cellular stress, increase in harmful free radicals, genetic damages, structural and functional changes of the reproductive system, learning and memory deficits, neurological disorders, and negative impacts on general well-being in humans. Damage goes well beyond the human race, as there is growing evidence of harmful effects to both plant and animal life."

Physicist Dr Ronald Powell analysed wireless smart meter emissions in light of the conclusions reached by the BioInitiative 2012 Report, a report compiled by 29 experts from ten countries which reviewed 1800 new scientific studies on nonionising radiation since the BioInitiative 2007 Report (which had, in turn, reviewed over 2,000 studies). He concluded that the power density at 100 metres from a smart meter is "higher than the power density that triggered biological effects" in 6 of the 67 studies which he considered (Powell 2013, p. 12). His analysis also showed that the RF power density from a smart meter does not drop down to the level of the RF exposure limits proposed by the BioInitiative 2012 Report until distances of 180 to 200 metres from a smart meter are reached.

It is not surprising, in view of the large body of studies attesting to adverse biological outcomes in response to pulsed radiofrequency radiation, that a number of people have been affected as a result of the rollout of smart meters.

Forcing smart meters on to customers - a central planning fiasco

The mandated rollout of electricity smart meters in Victoria has been acknowledged as being a disaster. Victoria's Auditor General slammed the rollout in his 2015 report (Moncrief 2015). Is the Essential Services Commission going to be complicit in approving a repeat of the same failed tactics? Professor of Economics, Stephen King, stated in 2015 that the rollout of smart meters was a "textbook case of bad public policy", singling out the ESC for its role in the deployment (King 2015).

It is not only in Victoria where the costs of smart meter technology have exceeded the benefits. Ontario's Auditor General passed scathing comment in 2014 on the

lack of success which its own smart meter rollout was having in achieving its objectives (Office of the Auditor General of Ontario 2014, p. 366).

Time of Use pricing – not what consumers want

Coliban Water appears to be labouring under the misapprehension that its average customer will view Time of Use (ToU) options as a means to "empower" them (Coliban Water 2017, p. 30). ToU tariffs have been a resounding failure for electricity utilities, with investigative reporter Karen Collier reporting less than a 1% take-up by Victorians in 2016 (Collier 2016). Why would Coliban Water imagine that they will prove attractive for water services, where there is even less justification?

ToU pricing tariffs also raise serious questions about social responsibility, as they often serve to discriminate against low-income and disadvantaged members of the community.

Concluding remarks

We hope that this information will assist the ESC in its review of Coliban Water's Pricing Submission 2018. Coliban Water's intention to deliver "a bold plan to deliver long term bill stability" appears, on the contrary, a likely recipe for disaster, in respect of its commitment to deliver smart meters to the community.

Yours sincerely

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