

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: Repacholi, Michael	Email address: mrepacholi@yahoo.com	Affiliation (if relevant): University of Rome “La Sapienza”, Italy
If you are providing these comments officially on behalf of an organization/company, please name this here: No		
<input checked="" type="checkbox"/> 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. <input type="checkbox"/> 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	<p>One of the main problems with this draft is it's inconsistency in the limit values for the overlapping frequency region (100 kHz – 10 MHz) with the LF 2010 guidelines</p> <p>This overlapping frequency region needs more discussion about what is the dominant mechanism and ONLY one set of limits; not two different limits where the reader is told to choose the lowest limit. So why not ICNIRP giving the lowest limit in it's guidelines??</p> <p>Given that the draft RF and published 2010 LF guidelines were developed by different committees ICNIRP MUST either combine the 2 guidelines and use the conservative basic restrictions and reference levels for the 100 kHz-10 MHz region or maintain a separate RF guideline with the one set of conservative limits that align with the LF guidelines.</p>
2	Guidelines	Line number	General	<p>As a general principle ICNIRP should not change it's limit values unless there is a significant change in the science that affects HEALTH. Unless the science shows that the current limit values could lead to adverse health effects, making the dosimetry and hence limit values more accurate, is NOT a reason to change the limits. We now have the example where the LF guidelines were changed because of improved dosimetry, and some limit values made less conservative. Public health authorities are the target audience of ICNIRP and they are NOT interested in more accurate dosimetry that shows the safety factors in the guidelines are greater than originally thought. As a result, since the relaxed limits in the LF guidelines were published 8 years ago, NOT ONE public health authority has adopted the new LF limits, making ICNIRPs changes irrelevant to them. This is a serious situation and reflects on ICNIRP's standing and credibility. ICNIRP guidelines, while science based, need to maintain it's conservative approach to limit values to continue to retain it's high standing among most national authorities. The ICRP has NEVER raised it's limits....</p> <p>Keep previous limit values unless there is a health based reason to LOWER them. Changes in the limits should NOT be driven by the dosimetry; ONLY health effects.</p> <p>The ICNIRP 1998 guidelines were confirmed in 2009. Has research shown any health-based justification for changing the limits? ICNIRP's assessment of the WHO and SCENIHR (2015) reviews is that NO health effects have been established below the guideline limits; so what is the justification for changing them? In the rationale of the current draft it can be explained that more recent dosimetry has shown that the limits are even more conservative than originally though; however, as ICNIRP adopts a very conservative, highly protective approach to the development of public and occupational health protection, and so the limits have been retained.</p>
3	Guidelines	193-200, 429-434	General	<p>This paragraph correctly notes the two mechanisms of nerve stimulation and heating, and that nerve stimulation dominates around 100 kHz and heating becomes more dominant with increasing frequency. Then states nerve stimulation is protected by the LF guidelines, implying the only heating is protected with the limits in the draft RF guidelines.</p> <p>Both guidelines should protect against BOTH mechanisms... this needs to be said, especially if ICNIRP is to publish 2 separate guidelines. However, it would be much better to combine the 2 guidelines.</p>

				It is confusing to the reader as it is implied that the LF guideline protects against nerve stimulation and the RF guideline protects against heating for the SAME frequency region. It is not good enough to state, as in lines 429-434, that the lowest limit for nerve stimulation (ICNIRP, 2010) or heating (RF guidelines) should be used. ICNIRP is assuming that the reader knows which mechanism is dominant??? Not the case for public health authorities.
4	Guidelines	470-474	General	<p>ICNIRP states: “ as ICNIRP considers that the benefits of maintaining stable basic restrictions outweighs any benefits that subtle changes to the basic restrictions would provide, ICNIRP has retained the conservative reduction factors and the ICNIRP 1998 whole body average basic restriction.” Obviously this stated principle has not been retained throughout the draft, and it should, as discussed above.</p> <p>Keep limit values unless there is a health based reason to change them</p> <p>This is IMPORTANT to public health authorities, ICNIRP’s main audience.</p>
5	Guidelines	590	Editorial	<p>Table 2 caption says it gives the basic restrictions for electric, magnetic and electromagnetic field exposure; but it only gives SAR values, not the basic restrictions for nerve stimulation. Obviously this is important for the frequency range 100 kHz – 10 MHz</p> <p>Basic restrictions.. insert all field values, including those for nerve stimulation.</p> <p>Important for 100 kHz – 10 MHz range. Cant expect readers to keep referring to 2 guidelines ... give ALL basic restrictions and reference values for this range.</p>
6	Document ?	Line number	Type of comment	<p>Insert your comment.</p> <p>Insert your proposed change.</p> <p>Explain the context of your comment.</p>
Continue numbering	Document ?	Line number	Type of comment	<p>Insert your comment.</p> <p>Insert your proposed change.</p> <p>Explain the context of your comment.</p>

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

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