

From: Group Concern [REDACTED]
To: panel_itb@legco.gov.hk
Cc: charlesmok@charlesmok.hk

Date: Thursday, July 26, 2018 03:37PM
Subject: Request for ITB Panel Attention on Excessive Radiation Level in Ho Man Tin

The Hon Mr Charles Peter MOK,
Chairman,
Legislative Council Panel
on Information Technology and Broadcasting

Dear Mr Mok,

We are a group of residents living in Ho Man Tin. We have recently noticed that there are some 20+ radio base stations (RBS) installed at the roof of the Hong Kong Football Association HQs. The resulting radiation level is alarming.

There are several major buildings around the Hong Kong Football Association HQs, including the Open University of Hong Kong, the Hong Kong Housing Authority HQs, and two residential developments known as One Homantin and Martin Heights.

Having noticed the presence of the RBS, we have requested the Office of the Communications Authority (OFCA) to measure the radiation level of our premises. The measurement showed that the radiation level reached some 8 volt per meter (v/M).

According to Standard of Building Biology Testing Methods and Guidelines 2003, which is adopted by the German telecommunications authority, the figure is already in the category of Strong Anomaly which require immediate remediation. The relevant standard and description are as attached.

We have asked OFCA to consider taking actions but OFCA's replies have been helplessly bureaucratic. OFCA just repeatedly stats that the radio frequency electromagnetic fields generated by RBS are a type of non-ionising radiation (NIR) which cannot cause harm by breaking chemical bonds in the human body.

OFCA officials then keep on repeating that the measurement results are within the acceptable range according to Hong Kong standard as stipulated in "Guidelines for Limiting Exposure to Time-varying Electric, Magnetic, and Electromagnetic Fields". To add weight to their statement, OFCA officials quote that the Hong Kong standard is adopted having regard to the professional advice of the Department of Health.

These standard replies could not lessen our concerns over radiation level to the slightest extent but to force us to bring this matter in front of you.

The Standard of Building Biology Testing Methods and Guidelines 2003 is an internationally recognized standard. While we understand that Hong Kong may need to adopt a more lenient standard given its population density, the Hong Kong standard is way too lenient and it fails to protect people who needs to stay at the premises round-the-clock, e.g. elderly and infants who have limited mobility. Worst still, the brain development of infants would be severely damaged by the radiation.

We respectfully demand that OFCA should at least direct the relevant telecommunications operators to-

- (a) reduce the transmission power of the RBS;
- (b) adjust the emission angle of the radio base stations to avoid direct irradiation into domestic premises;
- (c) relocate some if not all of the RBS from the roof of Hong Kong Football Association HQs to buildings that are not so close to residential developments;
- (d) reduce the number of RBS on the roof of Hong Kong Football Association HQs; and
- (e) consult the local communities including the Owners Incorporation of both One Homantin and Martin Height when OFCA is prepared to grant additional licences for installing RBS on the roof of Hong Kong Football Association HQs.

We also request your panel to discuss the reply to be provided by OFCA to prevent it from producing bureaucratic standard replies.

Best regards,
Wong & Ho & Lo & & Zhu & Lam

Attachments:

Standard.jpg

Standard 2.jpg

**No
Anomaly**

**Weak
Anomaly**

**Strong
Anomaly**

**Extreme
Anomaly**

A Electromagnetic Radiation (EMR)

1 AC Electric Fields (ELF)

Field strength in volt per meter	V/m	< 1	1 – 5	5 – 50	> 50
Body voltage in millivolt	mV	< 10	10 – 100	100 – 1000	> 1000

ACGIH (1996) occupational TLV 25,000 V/m; WHO/ICNIRP 5,000 V/m; Germany: DIN/VDE 0848 occupational: 20,000 V/m and general public: 7,000 V/m; MPR 25 V/m; TCO 10 V/m; US Congress recommendation in 1996: 10 V/m; nerve stimulation (RWE) starting at 15 mV; natural background < 0.0001 V/m

No Anomaly

reflects the optimal natural condition or the common and inevitable background of our modern living environment.

Weak Anomaly

makes you aware of an imbalance, which following the precautionary principle calls for a remediation in the long term, especially out of consideration for sensitive and ill people.

Strong Anomaly

is not acceptable for the Building Biology Guidelines, but requires remediation in the short term.

Extreme Anomaly

calls for immediate and rigorous action. In this case international guidelines of occupational exposures limits may be reached or even exceeded.