

# Joint Industry Statement on EMF Directive proposals



Council of European Employers  
of the Metal, Engineering and  
Technology-based industries



European Automobile  
Manufacturers Association



**CLEPA**  
European Association of  
Automotive Suppliers



European Welding Association



OPERATING EUROVISION AND EURORADIO



ORGALIME

**ACEA** - European Automobile Manufacturers Association

**BNE** - Broadcast Networks Europe

**CEEMET** - Council of European Employers of the Metal, Engineering and Technology-Based Industries

**CLEPA** - European Association of Automotive Suppliers

**ENTSO-E** - European Network of Transmission System Operators for Electricity

**EURELECTRIC** - Union of the Electricity Industry

**Euro Chlor** - Representing the European Chlor-alkali industry

**EBU** - European Broadcasting Union

**EWA** - European Welding Association

**ORGALIME** - European Engineering Industries Association

## Joint Industry Statement on EMF Directive proposals

This statement on the proposed revision of the EMF Directive is presented by the following bodies representing industries that will be impacted by the requirements of the revised EMF Directive:

[ACEA](#) (automobile manufacturers), [BNE](#) (broadcasting), [CEEMET](#) (manufacturing), [CLEPA](#) (automotive suppliers), [ENTSO-E](#) (electricity transmission), [EURELECTRIC](#) (electricity), [Euro Chlor](#) (chlorine production), [EBU](#) (broadcasting), [EWA](#) (welding), [ORGALIME](#) (mechanical, electrical, electronic and metallic engineering).

These industries have closely followed the Directive's development particularly through the joint Industry Expert Group (IEG) which has presented comments and recommendations to the Commission, Council and Parliament at each stage of the process.

We consider that any proposal must be proportionate and be realistic about what can be implemented, by balancing the cost to industry against improvements in the health and safety protection of workers, where real EMF risks exist.

We consider that a sound scientific basis for the Directive is essential, by aligning it with the latest guidelines of the International Commission on Non-Ionizing Radiation Protection (ICNIRP) who are the recognised authority, and we welcome the fact that both Council and the Commission have indicated they intend the Directive to reflect ICNIRP's recommendations.

Whereas considerable progress has been made with both the Commission Proposal of 14th June 2011 and the Council General Approach of 27th September 2012, there are important differences between the two proposals, and issues that still need to be resolved.

However, there are still elements of the current Council proposal that are unclear and contradictory, with the possible consequence that the Directive will fail the primary objective of applying ICNIRP and instead will become more restrictive on implementation than is intended and is envisaged by the ICNIRP guidance. Because this is a complex scientific subject the changes necessary to achieve the agreed objective of implementing ICNIRP are of necessity detailed.

The minimum changes we consider necessary to achieve a Directive which is scientifically accurate and self-consistent are set out in 16 comments in Annex 1, and are summarized as follows:

- Provide clear and non-contradictory statements about exposure limits (see comment 12 in Annex 1) particularly 'sensory effects', the 'sensory effects' exposure limit and the fact that it may be exceeded when controls are in place (see comment 1, 3, 7, 9, 10, 11 in Annex 1);
- Provide clear and non-contradictory statements about action levels and how they relate to the exposure limits (see comment 2, 3, 5, 6, 13 in Annex 1);
- Avoid the broadening of the action level concept so that it does not in effect become another form of exposure limit for indirect effects (see comment 8, 13 in Annex 1), and clarify that action levels may be exceeded (see comment 4, 5 in Annex 1);
- Ensure that signage requirements are linked to Exposure Limit Values (ELVs) not action levels (see comment 8 in Annex 1);
- Permit alternative methods of assessment for non-sinusoidal fields; similarly for spatial averaging of fields (see comment 14, 15, 16 in Annex 1);
- Retain the higher value of the high action level for magnetic fields (1 Hz to 10 MHz) and electric fields (50 Hz to 3 kHz) as detailed in the Commission proposal.

In addition there are elements of the Council Proposal that differ from the Commission Proposal that should be retained:

- The separation of the Annex II and III according to nerve stimulation effects and thermal effects;
- The separation of action levels for nerve stimulation and thermal effects;
- The addition of a higher magnetic field action level for limbs;
- The removal of the equipment “lists” in Annex II and III.
- Ensure that assessments against the action levels can take account of spatial averaging.

The ubiquitous nature of electromagnetic fields means that the impact of this Directive will be widespread, affecting the majority of the workers in the European Union, most of whom will require some form of risk assessment relating to EMFs; this Directive is not just about the medical resonance imaging (MRI) industry sector. The number of workers in industries where exposures are high enough to require control measures is smaller; the Commission’s Impact Assessment estimates this to be 1.64 million workers which is 0.8% of the total workforce). They estimates the total cost of implementation to be € 511 million, though this does not include the cost of replacing equipment or the true extent of control measures. We consider that a realistic estimate of the cost of implementation is likely to be considerably greater, without a corresponding increase in the level of protection of worker.

The proposed high action levels for magnetic and electric fields are stricter in the Council General Approach than the original Commission Proposal and than is derived from information provided by ICNIRP in their guidance. This will have a direct impact on specific industries and industrial processes, including those utilizing different types of welding equipment, electrolysis and induction heating. Known industries affected include the automobile, aircraft and shipping manufacturers and their supply chains, as well as the large number of SME’s who carry out welding repair work. There are also many industries that are unclear about the implications of this Directive because it is so complex, and because the requirements are still unclear. They are concerned about the potential costs.

For business, especially SMEs to be able to implement what is an extremely technical and complex Directive it is essential that clear guidance, information and assessment tools are available to them before they begin to make the changes needed. These are not yet available to industry or government, although it is intended that the practical guide is completed in advance of the transposition date. Industry and standard bodies will contribute to the development of implementation guidance for more complex situations and we urge that this work is initiated as soon as possible.

It is unrealistic to foresee full implementation in the short term immediately after transposition, particularly if significant changes of layout or of installed equipment are necessary. We propose that Member States are given 5 years to transpose the Directive after its date of adoption so that the tools and guidance that will be required can be developed for successful implementation. The time frame for implementation should be established after an assessment of the required equipment or process changes necessary to achieve compliance with the Directive.

With a view to protecting jobs in European companies, we hope these concerns will be addressed to avoid detrimental impact on industry and its ability to carry out common industrial processes, which have historically indicated negligible or no risks to workers.

03<sup>rd</sup> January 2013

## Annex 1 - Comments on the Council General Approach 27 September 2012 and Proposal for Amendments

The changes proposed here are the minimum necessary to make this version scientifically correct and self consistent. As a result it will become easier to understand which will increase its acceptability and effectiveness.

In any combining of the Council and Commission versions, we would ask that these (or equivalent) changes should be incorporated.

No.	Article	Para / Figure/ Table	Comments	Proposed change From	Proposed change To
1	2	d	<p><b>Meaning of sensory effects ELV</b></p> <p>The explanation of sensory effects ELV needs to be expanded to say what sensory effects are, and that they may give rise to safety risks unless controls are in place.</p>	(i) "sensory effects ELV" means exposure limit values above which workers might be subject to transient disturbed sensory perceptions and minor changes in brain functions; and	(i) "sensory effects ELV" means exposure limit values above which workers might be subject to <b>sensory effects, such as</b> transient disturbed sensory perceptions and minor changes in brain functions, <b>and consequent safety risks may occur unless they are controlled for;</b> and
2	2	(e) second sentence and (g) (i)	<p><b>Meaning of E field AL</b></p> <p>The definition of E field action levels given here is incomplete since it leaves out the important link with the exposure limit values and only talks of prevention measures. It therefore does not correspond with <i>the terminology used in Annex II</i>, which does mention this link with ELVs. The proposed change will ensure the two statements do correspond.</p>	The terminology used in Annex II is as follows: (i) for electric fields, "low AL" and "high AL" means levels which <b>relate to the</b> specific protection or prevention measures specified in this Directive;	The terminology used in Annex II is as follows: (i) for electric fields, the "low AL" and "high AL" means levels <b>at which both the health effects ELV and the sensory effects ELV are complied with. Above the "low AL"</b> specific protection or prevention measures <b>are</b> specified in this Directive;

No.	Article	Para / Figure/ Table	Comments	Proposed change From	Proposed change To
3	3	2	<p><b>Exceeding sensory effects ELV:</b></p> <p>This statement is incorrect since it does not allow the exposure to exceed the sensory effects ELV, which is a central feature of this directive and which is explicitly permitted in Article 3(4) (provided safety risks are prevented.)</p> <p>This paragraph needs to be amended to allow the sensory effects ELV to be exceeded when this is permissible.</p>	<p>Member states shall require that the employer ensure that exposure of workers to electromagnetic fields is limited to the health effects ELV <b>and sensory effects ELV</b> for non-thermal effects set out in Annex II and for thermal effects set out in Annex III. ...</p>	<p>Member states shall require that the employer ensures that exposure of workers to electromagnetic fields is limited to the health effects ELV for non-thermal effects set out in Annex II and for thermal effects set out in Annex III, <b>and, where required in Article 3(4), to the sensory effects ELV set out in Annex II. ...</b></p>
4	3	3 intro 3 <sup>rd</sup> sentence	<p><b>Exceeding ALs</b></p> <p>The wording of this part sentence implies that only those action values listed may be exceeded. This would be an unintended meaning which should be avoided by rewording as proposed.</p> <p>In the proposed wording the emphasis is that when the particular action levels are exceeded, further actions are required.</p>	<p>Nevertheless, <b>without prejudice to this paragraph, exposure may exceed:</b></p>	<p>Nevertheless, <b>where an action level is exceeded, additional requirements are necessary, as follows:</b></p>

No.	Article	Para / Figure/ Table	Comments	Proposed change From	Proposed change To
5	3	3 (a)	<p><b>Conditions for exceeding low AL for E</b></p> <p>This section provides two alternative conditions for exceeding the low AL for electric field. However the logic relating to the sensory effects ELV is incorrect.</p> <p>In the proposed rewording, instead of including sensory effects at the beginning of the paragraph, a new condition (i a new) has been added.</p> <p>The proposed modification to (ii) provides a better description of action to take concerning spark discharges and contact currents. Prevention of these is neither feasible nor necessary. See also comment 13.</p> <p>In relation to (iii), it is not appropriate to make the provision of information to workers a condition for exceeding the action level. Provision of such information is covered generally in Article 6. Note also that Article 6(f) specifically relates to “sensory effects” which do not necessarily occur if the AL is exceeded; only if the sensory effects ELV is exceeded, which is covered via the proposed clause (i a new).</p>	<p>(a) low AL for electric fields (Annex II, Table B1), where justified by the practice or process, provided that <b>the sensory effects ELV (Annex II, Table A3) are not exceeded;</b></p> <p><b>or</b></p> <p>(i) the health effects ELV (Annex II, Table A2) are not exceeded;</p> <p>(ii) excessive spark discharges and contact currents (Annex II, Table B3) are <b>prevented</b> by specific protection measures as set out in Article 5(6); <b>and</b></p> <p><b>(iii) information to workers has been given in accordance with Article 6(f);</b></p>	<p>(a) low AL for electric fields (Annex II, Table B1), where justified by the practice or process, provided that:</p> <p>(i) the health effects ELV (Annex II, Table A2) are not exceeded; <b>and</b></p> <p><b>(i a new) the sensory effects ELV (Annex II, Table A3) is not exceeded or action is taken in accordance with Article 5(9), relating to transient symptoms under (a) of that Article; and</b></p> <p>(ii) excessive spark discharges and contact currents (Annex II, Table B3) are <b>limited</b> by specific protection measures as set out in Article 5(6);</p>

No.	Article	Para / Figure/ Table	Comments	Proposed change From	Proposed change To
6	3	3 (b)	<p><b>Conditions for exceeding low AL for B</b></p> <p>This section provides two alternative conditions for exceeding the low AL for magnetic field. However the logic relating to the sensory effects ELV does not have the intended meaning. Instead of including sensory effects at the beginning, it needs to be included as part of (iii) as proposed.</p> <p>The phrase “<i>also in the head or torso, during the shift</i>” does not make sense as written. In fact Table B2 of Annex II specifies which values apply to which part of the body so the phrase can be omitted without any loss to the correct meaning.</p> <p>In relation to (iv), it is not appropriate to make the provision of information to workers a condition for exceeding the action level. Provision of such information is covered generally in Article 6.</p> <p>Note also that Article 6(f) specifically relates to “sensory effects” which do not necessarily occur when the AL is exceeded, unless the sensory effects ELV is exceeded, which is covered via (iii).</p>	<p>(b) low AL for magnetic fields (Annex II, Table B2) where justified by the practice or process, <b>also in the head and torso</b>, during the shift, provided that <b>the sensory effects ELV (Annex II, Table A3) are not exceeded; or</b></p> <p>(i) the exceedance is temporary;</p> <p>(ii) the health effects ELV (Annex II, Table A2) are not exceeded;</p> <p>(iii) action is taken in accordance with Article 5(9), <b>subject</b> to transient symptoms under (a) of that Article; <b>and</b></p> <p><b>(iv) information to workers has been given in accordance with Article 6(f);</b></p>	<p>(b) low AL for magnetic fields (Annex II, Table B2) where justified by the practice or process, during the shift, provided that:</p> <p>(i) the exceedance is temporary;</p> <p>(ii) the health effects ELV (Annex II, Table A2) are not exceeded;</p> <p>(iii) <b>the sensory effects ELV (Annex II, Table A3) is not exceeded or</b> action is taken in accordance with Article 5(9), <b>relating</b> to transient symptoms under (a) of that Article;</p>

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7	5	2 intro	<p><b>On reducing exposures – in Article 5</b></p> <p>This paragraph requires measures to reduce exposures so that they do not exceed the health effects ELV (which is correct) and also so that they do not exceed the sensory effects ELV (which is not correct). Actions to reduce exposures to below the sensory effects ELV are not required if measures according to Article 5(9) are taken. This can be corrected with the addition of “, if appropriate,” as proposed.</p>	<p>On the basis of the risk assessment referred to in Article 4, once relevant action levels referred to in Article 3 and Annexes II and III are exceeded, unless the assessment carried out in accordance with article 4(1), (2) and (3) demonstrates that the relevant ELV are not exceeded and that safety risks can be excluded, the employer shall devise and implement an action plan comprising technical and/or organisational measures to prevent exposure exceeding the health effects ELV and sensory effects ELV, taking into account in particular:</p> <p>...</p>	<p>On the basis of the risk assessment referred to in Article 4, once relevant action levels referred to in Article 3 and Annexes II and III are exceeded, unless the assessment carried out in accordance with article 4(1), (1a) and (1b) demonstrates that the relevant ELV are not exceeded and that safety risks can be excluded, the employer shall devise and implement an action plan comprising technical and/or organisational measures to prevent exposure exceeding the health effects ELV and, <b>if appropriate, the</b> sensory effects ELV, taking into account in particular:</p> <p>...</p>



No.	Article	Para / Figure/ Table	Comments	Proposed change From	Proposed change To
8	5	5	<p><b>Requirements for signage</b></p> <p>This paragraph specifies signage requirements and access limitations which apply on exceeding action levels. However these should not be required when it is demonstrated that ELVs are not exceeded. The solution is to add <i>“unless the assessment carried out in accordance with ...demonstrates that the ELV are not exceeded and that safety risks can be excluded”</i>.</p> <p>Note that these words were present in the 13 September version of the Council proposal but were removed for the final version.</p> <p>Note that access needs to be limited only where the health effects ELV is exceeded. Where only the sensory effects ELV is exceeded a warning is required.</p> <p>Note that this paragraph describes the need for signage relating to direct effects of fields. If there are additional needs relating to indirect effects (such as acceleration of projectiles in static magnetic fields) then the need for signage would be established as a result of Article 5(3) and would be tailored to that particular risk.</p> <p>Note that requirements for unnecessary signage can result in substantial unnecessary cost.</p>	<p>On the basis of the risk assessment referred to in Article 4, workplaces where workers are likely to be exposed to electromagnetic fields exceeding the action levels shall be indicated by appropriate signs in accordance with annexes II and III and with Council Directive 92/58/EEC of 24 June 1992 on the minimum requirements for the provision of safety and/or health signs at work (ninth individual Directive within the meaning of Article 16(1) of Directive 89/391/EEC).The areas in question shall be identified and access to them limited as appropriate. Where access to these areas is suitably restricted for other reasons and workers informed on the electromagnetic risks, then signs and access restrictions specific to electromagnetic fields shall not be required.</p>	<p>On the basis of the risk assessment referred to in Article 4, workplaces where workers are likely to be exposed to electromagnetic fields exceeding the action levels shall be indicated by appropriate signs in accordance with Annexes II and III and with Council Directive 92/58/EEC of 24 June 1992 on the minimum requirements for the provision of safety and/or health signs at work (ninth individual Directive within the meaning of Article 16(1) of Directive 89/391/EEC), <b>unless the assessment carried out in accordance with Articles 4(1), 4(2) and 4(3) demonstrates that the relevant ELV are not exceeded and that safety risks can be excluded</b>. The areas in question shall be identified and access to them limited as appropriate. Where access to these areas is suitably restricted for other reasons and workers informed on the electromagnetic risks, then signs and access restrictions specific to electromagnetic fields shall not be required.</p>

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9	5	8	<p><b>Conditions relating to exceeding ELVs</b></p> <p>This paragraph repeats the requirement given in Article 5(2 intro) to reduce exposures on exceeding sensory or health effects ELVs. It makes the same mistake as Article 5(2) [see comment 7] by not recognising that the sensory effects ELV can be exceeded.</p> <p>The cross reference to Article 3(3) (which is about action levels) is an editorial error – it is the number from in a previous draft and should be deleted. The new reference is 3(4) which has already been added.</p>	<p>Workers shall not be exposed above the <b>sensory effects ELV and</b> health effects ELV, unless the conditions under Articles <b>3(3)</b>, 3(4), 10(2) or 10(4) are fulfilled. If, despite the measures taken by the employer to comply with this Directive, the health effects ELV <b>and</b> sensory effects ELV are exceeded, the employer shall take immediate action to reduce exposure below <b>these</b> exposure limit values. The employer shall identify the reasons why the health effects limit values <b>and sensory effects limit values</b> have been exceeded, and shall amend the protection and prevention measures accordingly in order to prevent them being exceeded again.</p>	<p>Workers shall not be exposed above the health effects ELV, <b>or above the sensory effects ELV</b> unless the conditions under Articles 3(4), 10(2) or 10(4) are fulfilled. If, despite the measures taken by the employer to comply with this Directive, the health effects ELV <b>or</b> sensory effects ELV are <b>inappropriately</b> exceeded, the employer shall take immediate action to reduce exposure below <b>the</b> exposure limit values <b>that has been exceeded</b>. The employer shall identify the reasons why the health effects limit values have been exceeded, and shall amend the protection and prevention measures accordingly in order to prevent them being exceeded again.</p>
10	5	9 intro	<p><b>Requirements relating to sensory effects</b></p> <p>This paragraph needs to make it clear that the prevention measures referred to are to “ensure safety risks are avoided”.</p> <p>The unintended meaning of the present wording that sensory effects themselves (ie the transient symptoms) must be prevented which is not correct. Note that the recognition that sensory effects are not health effects and can be permitted (provided safety risks do not result), represents an important aspect of the “greater flexibility” introduced into the Commission Proposal compared with the 2004 Directive and should be retained.</p>	<p>In application of Articles 3(3) and 3(4), in case of occurrence of transient symptoms referred to in Article 2(b) reported by the worker, the employer shall update, if necessary, the risk assessment and the prevention measures.</p> <p>Transient symptoms might be related to:</p>	<p>In application of Articles 3(3) and 3(4), in case of occurrence of transient symptoms referred to in Article 2(b) <b>and 2(d)</b> reported by the worker, the employer shall update, if necessary, the risk assessment and the prevention measures <b>to ensure that safety risks are avoided</b>.</p> <p>Transient symptoms might be related to:</p>

No.	Article	Para / Figure/ Table	Comments	Proposed change From	Proposed change To
11	Annex II	Above Tables A2 and A3	<p><b>Statement about health effects ELV and sensory effects ELV.</b></p> <p>The statement that the health effects ELV is <i>related to</i> all peripheral and central nervous system tissue in the body including the head is misleading. In fact the values used are the values (as given by ICNIRP 2010) for stimulation of PNS tissue only, not of CNS tissue. For CNS tissue different values apply and are given as the ELV for sensory effects. What the paragraph should say is that the health effects ELV <i>applies to</i> all PNS and CNS tissue, including that in the head.</p> <p>The corresponding statement about sensory effects ELV (above Table A3) similarly needs to change “<i>related to</i>”, to “<i>apply to</i>”.</p>	<p><i>Above table A2</i> Health effects ELV (Table A2) <b>are related to</b> electric stimulation of all peripheral and central nervous system tissues in the body, including head.</p> <p><i>Above Table A3</i> The sensory effects ELV (Table A3) <b>are related to</b> electric field effects on the central nervous system in the head, i.e. retinal phosphenes and minor changes in some brain functions.</p>	<p><i>Above Table A2</i> Health effects ELV (Table A2) <b>apply to</b> electric stimulation of all peripheral and central nervous system tissues in the body, including <b>the</b> head.</p> <p><i>Above Table A3</i> The sensory effects ELV (Table A3) <b>apply to</b> electric field effects on the central nervous system in the head, i.e. retinal phosphenes and minor changes in some brain functions.</p>

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12	Annex II	Note A2-2 and Note A3-2	<p><b>Internal electric field values</b></p> <p>These statements are misleading as written. It is necessary to add that they apply specifically to nervous tissue.</p> <p>It is also necessary to include a note to clarify that numerical dosimetry calculations include averaging. The detail given here is that specified by ICNIRP in their 2010 guidance and underlies their approach which is used in this Directive.</p>	<p>Note A2-2: The health effects ELV for internal electric field are spatial peak values in all the body of the exposed subject.</p> <p>Note A3-2: The sensory effects ELV for internal electric field are spatial peak values in the head of the exposed subject.</p>	<p>Note A2-2: The health effects ELV for internal electric field are spatial peak values <b>in the nervous tissue of</b> all the body of the exposed subject.</p> <p><b>Note A2-2A When computing induced electric fields for comparison with ELVs the interpretation of computations shall follow relevant good practice such as that recommended by ICNIRP.</b></p> <p>Note A3-2: The sensory effects ELV for internal electric field are spatial peak values in <b>the nervous tissue of</b> the head of the exposed subject.</p>
13	Annex II	Above Table B1	<p><b>E field high action level descriptions</b></p> <p>Prevention of spark discharges is neither realistic nor necessary. They need to be <i>“limited”</i> (as in the first paragraph) rather than <i>“prevented”</i>.</p> <p>The cross reference to Article 5(3a) should be updated to Article 5(6).</p>	<p>Below high AL, the internal electric field does not exceed the exposure limit values (Tables A2 and A3) and annoying spark discharges are <b>prevented</b>, <b>provided that</b> the protection measures in <b>5(3a)</b> are adopted.</p>	<p>Below the high AL (Table B1) the internal electric field does not exceed the exposure limit values (Tables A2 and A3) and annoying spark discharges are <b>limited using</b> the protection measures of <b>5(6)</b>.</p>

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14	Annex II	Notes A2-3 A3-3 B1-2 B2-2	<p><b>Assessment method for non-sinusoidal fields</b></p> <p>It should be permissible to use any <i>scientifically-valid</i> method for non-sinusoidal fields.</p> <p>The contradiction that the weighted peak method “shall” be used while other methods can also be applied is removed by converting “shall” to “should”.</p> <p>The qualification “<i>provided they lead to approximately equivalent and comparable results</i>” negates this and should be deleted.</p>	<p>In the case of non-sinusoidal field the exposure evaluation carried out in accordance with Article 4 <b>shall</b> be based on the weighted peak method (filtering in time domain), explained in the Commission practical guide as set out in Article 14, but other scientifically proven and validated exposure procedures can be applied <b>provided that they lead to approximately equivalent and comparable results.</b></p>	<p>In the case of non-sinusoidal field the exposure evaluation carried out in accordance with Article 4 <b>should</b> be based on the weighted peak method (filtering in time domain), explained in the Commission practical guide as set out in Article 14, but other scientifically proven and validated exposure procedures can be applied.</p>
15	Annex II  and Annex III	Notes B1-3 and B2-3  Note B1-3	<p><b>Spatial averaging</b></p> <p>This section here needs to be revised (as proposed) so that it is just about the use of spatial averaging when applying action values and to make it consistent with ICNIRP 2010. Numerical dosimetric assessments “case by case” should not be stipulated here.</p>	<p>Note B1-3: <b>AL represent maximum calculated or measured values at workers body position. This results in a conservative exposure assessment and automatic compliance with ELV in all non-uniform exposure conditions. In order to simplify the assessment of compliance with ELV in specific non-uniform conditions, criteria of spatial averaging of measured fields based on established dosimetry will be laid down in the practical guide referred to in Article 14. In the case of a very localized source with a distance of a few centimetres from the body, the induced electric field shall be determined dosimetrically, case by case.</b></p>	<p>Note B1-3: <b>Where the field is approximately uniform the Action Levels should be compared with the maximum calculated or measured values of the field at the worker’s body position, in the absence of the worker. When the field is non-uniform the maximum field level represents a conservative assessment of exposure. Spatial averaging methods may be used to provide a more precise estimate of the exposure. However there are limitations to such methods and guidance on them and how to apply them will be provided in the practical guide referred to in Article 14.</b></p>

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16	Annex III	B  2nd Para	<p><b>Spatial maximum</b></p> <p>These words are similar to those that occur in the corresponding place for Annex II, except that here they include an additional point that they are maximum values, which is incorrect (see Note B1-3 of Annex III).</p> <p>Change the text in Annex III to mirror the equivalent text in Annex II.</p>	<p>Action Levels correspond to calculated or measured field values at the workplace in absence of the worker, <b>as maximum value at the position of the body or specified part of the body.</b></p>	<p>Action Levels correspond to calculated or measured field values at the workplace in absence of the worker.</p>