

23 April 2026

File Ref: 260282

Spencer Jones
Via FYI.org.nz

Dear Spencer

Thank you for your Official Information Act (the Act) request received on 24 March 2026. You requested:

1. RF / EMF as a Workplace Hazard

Please confirm whether WorkSafe recognises radiofrequency (RF) or electromagnetic field (EMF) exposure as a potential workplace hazard within its regulatory or guidance framework.

If so, please provide:

- any guidance documents, policies, or internal frameworks relating to RF/EMF exposure*
- any standards, references, or external sources relied upon (e.g. ICNIRP, NZS 2772.1:1999)*

2. Consideration of RF Exposure in Practice

Please provide any documents, guidance, or internal material that describe how RF/EMF exposure risks are assessed, monitored, or addressed in workplace contexts (including but not limited to telecommunications, utilities, or electrical infrastructure environments).

3. Consideration of Smart Meters

Please confirm whether RF exposure from electricity smart meters (Advanced Metering Infrastructure – AMI) has ever been:

- explicitly considered*
- implicitly considered as part of broader RF/EMF hazard assessments*
- or explicitly excluded from consideration*

If so, please provide any records, guidance, or communications reflecting that consideration.

4. Scope of Previous Search

For clarity, please outline the scope of the searches undertaken in response to my previous request (Ref: 260178), including:

- which teams, units, or directorates were consulted*
- whether policy, regulatory, or inspectorate functions beyond the Energy Safety team were included*

5. Absence Confirmation

If no information is held in relation to the above, please confirm whether this reflects:

- that WorkSafe has not undertaken or documented any consideration of RF/EMF exposure as a workplace risk; or*
- that such matters are considered to fall outside WorkSafe's regulatory scope*

RF/EMF as a Workplace Hazard

WorkSafe recognises that there are potential risks to health stemming from exposure to radiofrequencies and electromagnetic fields (EMF) exceeding the limits set by applicable exposure standards such as NZS 2772. For further information, see the Ministry of Health webpage on non-ionising fields: [Radiofrequency field exposure standard](#).

WorkSafe's role as a regulator under the Health and Safety at Work Act 2015 (HSWA) is not to determine what constitutes a potential hazard and subsequently hold information used to make that determination. Instead, businesses are required under HSWA to identify potential hazards within their workplace and manage so far as is reasonably practicable.

As such this part of your request is refused under section 18(e) of the Act as the information requested does not exist or, despite reasonable efforts to locate it, cannot be found.

Consideration of RF Exposure in Practice

The WorkSafe website has the following documents which contains some guidance for EMF:

[Health and safety by design: an introduction | WorkSafe](#)
[Safe use of machinery | WorkSafe](#)

WorkSafe also holds a copy of the *2010 American Conference of Government Industrial Hygienists (ACGIH) Time Limit Values (TLV) for Radiofrequency and Microwave Radiation*. WorkSafe would refer to reference material such as this if required.

This document is available to purchase through the American Conference of Governmental Industrial Hygienist's website here:

[RADIOFREQUENCY/MICROWAVE RADIATION - ACGIH](#)

This part of your request has been refused under section 18(d) of the Act, as the information requested is publicly available, noting that publicly available can also mean that the information is available for purchase.

Consideration of Smart Meters RF Exposure

I refer this part of your request to our previous response, reference 260178, advising that WorkSafe does not hold information on RF exposure from electricity smart meters. WorkSafe has not explicitly considered RF exposure from smart meters as distinct from any other potential exposure source.

Scope of Previous Search

As your previous request was seeking records on WorkSafe's consideration of RF exposure specifically for Smart Meters, the Energy Safety team were asked to confirm what information would be held on this topic. Researching would have identified any references to EMF or RF, regardless of their origin.

This reply addresses the information you requested. You have the right to ask the Ombudsman to investigate and review my decision, and further information is available at www.ombudsman.parliament.nz.

If you require further assistance, please contact ministerial.services@worksafe.govt.nz.

Yours sincerely



Rob Pope
Head of Inspectorate