

<b>COMPLAINT NUMBER</b>	19/025
<b>COMPLAINANT</b>	M Honeychurch
<b>ADVERTISER</b>	EarthWaves
<b>ADVERTISEMENT</b>	EarthWaves pamphlet
<b>DATE OF MEETING</b>	30 April 2019
<b>OUTCOME</b>	Upheld Advertisement to be removed

### **SUMMARY**

The pamphlet for EarthWaves “Electromagnetic field detection and remediation”, sourced at the Go Green expo, says: “EarthWaves conduct detection services to identify harmful EMFs providing you with a comprehensive report and work with you to reduce, eliminate or shield your family from electro pollution.” A number of Health Effects or “symptoms of exposure to EMF” (Electromagnetic Fields) are listed. These range from headaches to psychosis to ringing in the ears.

The Complainant was concerned the advertisement was socially irresponsible and misleading because it uses fear mongering and pseudoscience about “supposed harmful frequencies” and “electro pollution” in order to sell products and services designed to protect people from this “harmful” radiation. The Complainant also said the advertisement makes therapeutic claims which cannot be substantiated. For example, EMFs can cause various medical conditions and EarthWaves can help protect people from this radiation.

The Advertiser made some changes to the advertisement, with a view to having these aspects of the complaint settled. Other aspects of the complaint were defended by the Advertiser. The Advertiser said they do not claim to detect the cause of medical conditions nor claim they address the problems of health.

The Complaints Board agreed the advertisement was likely to lead people to believe that harmful consequences may result if the EarthWaves service or product was not used. This is because the pamphlet lists a significant range of possible “Health Effects” that could result from exposure to EMFs.

The Complaints Board acknowledged that while the advertisement raised serious concerns about the potential impact of possibly “harmful EMF’s”, the Advertiser had not provided enough substantiation to support all the claims about the possible health effects that could result from exposure to EMFs.

The Complaints Board ruled the complaint was Upheld.

### **Advertisement to be removed.**

Please note this headnote does not form part of the Decision.

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## **COMPLAINTS BOARD DECISION**

The Chair directed the Complaints Board to consider the complaint with reference to Principles 1 and 2 and Rules 1(b) and 2(a) of the Therapeutic and Health Advertising Code.

Principle 1 required the Complaints Board to consider whether the advertisement observed a high standard of social responsibility, particularly as consumers often rely on such products, devices and services for their health and wellbeing.

Rule 2(b) required the Complaints Board to consider whether the advertisement contained any claim, statement or implication that the products, devices or services advertised are safe or that their use cannot cause harm or that they have no side effects or risks, are effective in all cases, are infallible, unfailing, magical, miraculous, or that it is a certain, guaranteed or sure cure, are likely to lead persons to believe that they are suffering from a serious ailment, or harmful consequences may result from the therapeutic or health product, device or service not being used.

Principle 2 required the Complaints Board to consider whether the advertisement contained any statement which was untruthful, unbalanced or misleading or likely to mislead, deceive or confuse consumers, abuse their trust, exploit their lack of knowledge or without justifiable reason, play on fear. This includes by implication, omission, ambiguity, exaggerated or unrealistic claim or hyperbole.

Rule 2(a) required the Complaints Board to consider whether the advertisement contained any statement which was inaccurate or unable to be substantiated. Substantiation should exist prior to a claim being made. For medicines and medical devices, therapeutic claims must be consistent with the approved indication(s) (for medicines) or the listed intended purpose (for medical devices).

**The Complaints Board ruled the complaint was Upheld.**

### **The Complaint**

The Complainant was concerned the advertisement was socially irresponsible and misleading because it uses fear mongering and pseudoscience about “supposed harmful frequencies” and “electro pollution”<sup>1</sup> in order to sell products and services designed to protect people from this “harmful” radiation. The Complainant also said the advertisement makes therapeutic claims which cannot be substantiated. For example, electromagnetic fields (EMFs) can cause various medical conditions and EarthWaves can help protect people from this radiation.

### **The Advertiser’s response**

The Advertiser made some changes to the advertisement, with a view to having these aspects of the complaint settled. Other aspects of the complaint were defended by the Advertiser. The Advertiser said they do not claim to detect the cause of medical conditions nor claim they address the problems of health.

### **Complaints Board Discussion**

#### *Consumer Takeout*

The Complaints Board agreed the consumer takeout of the advertisement was electromagnetic fields can be harmful and EarthWaves can provide a service to help identify and reduce their impact.

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<sup>1</sup> “electro pollution” is defined as harm created by electronics or wires in your home.

The Complaints Board noted the Advertiser's comment that there are probably less than 100 of these pamphlets in circulation and they have only been available for those that have taken an interest in the subject.

*Is the advertisement likely to lead people to believe that harmful consequences may result if the EarthWaves service/product was used?*

The Complaints Board agreed the advertisement was likely to lead people to believe that harmful consequences may result if the EarthWaves service or product was not used. This is because the pamphlet lists a significant range of possible "Health Effects" that could result from exposure to EMFs. Below this list of health effects is an image of a yellow box with the text "Danger Wireless".

The Complaints Board referred to the use of the word "diagnose" in the text "Diagnose – Distance – Deactivate – Defend" and agreed this word tends to be associated with medical conditions, especially when associated with possible "Health Effects".

The Complaints Board agreed the use of the word "awash" in the phrase "The modern home is now awash with electric, magnetic, and high frequency radiation" created an impression that the use of modern appliances was harmful, and this amounted to emotive scare mongering. The reference to "electro pollution" added to the feeling created of harm being present in the home.

*Does the proposed addition of the word "possibly" before the phrase "harmful EMFs" and the removal of the phrase "recognition of the dangers from exposure" settle this part of the complaint?*

The Complaints Board agreed that the addition of the word "possibly" to make the sentence: "EarthWaves conduct detection services to identify *possibly* harmful EMFs providing you with a comprehensive report and work with you to reduce, eliminate or shield your family from electro pollution." would not settle this complaint. This is because the sentence still implies that harmful consequences (or health effects) "may" result from the product or service not being used.

The Complaints Board agreed removal of the phrase "...recognition of the dangers from exposure." from the sentence "Whilst at present there is limited exposure of this issue to the wider public, there is in fact a vast network of organisations, scientists and individuals around the world working towards raising awareness and recognition of the dangers from exposure" would also not be sufficient to settle this complaint.

*Is the advertisement misleading and are the statements and claims made valid, and able to be substantiated?*

The Complaints Board agreed the advertisement was misleading. The Complaints Board said the advertisement raised serious concerns about the potential impact of possibly "harmful EMF's" and suggested serious health effects could result from this exposure.

The Complaints Board acknowledged that while the advertisement raised serious concerns about the potential impact of possibly "harmful EMF's", the Advertiser had not provided enough substantiation to support all the claims about the possible health effects that could result from exposure to EMFs.

The Complaints Board noted the documentation provided by the Advertiser in support of the view that EMFs can be harmful. The Complaints Board said while there are those who have strongly held beliefs about the potential harmful effects of EMFs, the substantiation provided to the Board appeared to be opinion-based and was not sufficiently robust to support the claims made.

*Is the advertisement socially responsible?*

The Complaints Board said the advertisement was not socially responsible, taking into account context, medium, audience and product and was not in breach of Principles 1 and 2 and Rules 1(b) and 2(a) of the Therapeutic and Health Advertising Code.

The Complaints Board ruled the complaint was Upheld.

**DESCRIPTION OF ADVERTISEMENT**

The pamphlet for EarthWaves "Electromagnetic field detection and remediation", sourced from the Go Green expo, says: "EarthWaves conduct detection services to identify harmful EMFs providing you with a comprehensive report and work with you to reduce, eliminate or shield your family from electro pollution." A number of Health Effects or "symptoms of exposure to EMF" (Electromagnetic Fields) are listed. These range from headaches to psychosis to ringing in the ears.

**COMPLAINT FROM M HONEYCHURCH**

EarthWaves advertise their EMF detection and remediation service, claiming that houses have harmful "EMFs". They also sell devices that they claim are able to help stop these supposed harmful frequencies. The flyer uses scaremongering and pseudoscience to sell their service to customers.

The flyer talks about "harmful EMFs" and "electro pollution" and contains quotes such as:  
 "A wifi classroom is like the inside of a microwave oven set at very low power. Children are exposed to that wifi radiation six hours every school day, five days a week, and for several months during the year"  
 "Scientists estimate that your daily exposure to EMF radiation is 100 million times higher than it was in your grandparents time"

The flyer also claims that a whole range of medical issues can be caused by EMF:  
 "Neurological: headaches, dizziness, nausea, difficulty concentrating, memory loss, irritability, depression anxiety, insomnia, fatigue, weakness, tremors, muscle spasms, numbness, tingling, altered reflexes, muscle and joint pain, leg/foot pain, "Elulike" symptoms, fever. More severe reactions can include seizures, paralysis, psychosis and stroke.  
 Cardiac: palpitations, arrhythmias, pain or pressure in the chest, low or high blood pressure, slow or fast heart rate, shortness of breath.  
 Respiratory: sinusitis, bronchitis, pneumonia, asthma  
 Dermatological: skin rash, itching, burning, facial flushing.  
 Ophthalmologic: pain or burning in the eyes, pressure in/behind the eyes, deteriorating vision, cataracts.

Others: digestive problems; abdominal pain; enlarged thyroid, testicular/ovarian pain; dryness of lips, tongue, mouth, eyes; great thirst; dehydration; nose bleeds; internal bleeding, altered sugar metabolism; immune abnormalities; redistribution of metals within the body; hair loss; pain in the teeth; deteriorating fillings; impaired sense of smell; ringing in the ears."

These claims, along with the claim that the company is able to "diagnose" EMF as the cause of these medical conditions and help reduce the symptoms, appear to breach the ASA's Therapeutic and Health Advertising Code.

Principle 2 is breached, as the claims that EMF can cause these medical conditions, and that EarthWaves can detect the cause of these conditions and address the problem, appear to not be truthful and are likely to be misleading to consumers. The claims also play on consumers' fear and exploit their lack of knowledge about Electromagnetic Frequencies.

Rule 2(a) is breached, as the claims made in this flyer are not accurate and have not been substantiated.

Principle 1 is breached, as it is socially irresponsible to use fear mongering and pseudoscience to sell products and services such as EarthWaves' survey and reporting service on "harmful EMFs".

Rule 1(b) has been breached, as the wording in this flyer suggests that harm will come to people who do not engage EarthWaves' services, with talk of:

"work with you to reduce, eliminate or shield your family from electro pollution"

"The modern home is now awash with electric, magnetic, and high frequency radiation."

"A wifi classroom is like the inside of a microwave oven set at very low power"

"recognition of the dangers from exposure"

"EarthWaves are committed to providing support for those that wish to increase their awareness and work towards identifying, reducing and shielding themselves from this increasing threat"

## **CODES OF PRACTICE**

### **PRINCIPLE 1**

Therapeutic and Health advertisements shall observe a high standard of social responsibility particularly as consumers often rely on such products, devices and services for their health and wellbeing.

- 1(b) Advertisements shall not contain any claim, statement or implication that the products, devices or services advertised;
- are safe or that their use cannot cause harm or that they have no side effects or risks.
  - are effective in all cases
  - are infallible, unailing, magical, miraculous, or that it is a certain, guaranteed or sure cure
  - are likely to lead persons to believe that;
    - they are suffering from a serious ailment, or
    - harmful consequences may result from the therapeutic or health product, device or service not being used

### **PRINCIPLE 2**

Advertisements shall be truthful, balanced and not misleading. Advertisements shall not mislead or be likely to mislead, deceive or confuse consumers, abuse their trust, exploit their lack of knowledge or without justifiable reason, play on fear. This includes by implication, omission, ambiguity, exaggerated or unrealistic claim or hyperbole.

- 2(a) Advertisements shall be accurate. Statements and claims shall be valid and shall be able to be substantiated. Substantiation should exist prior to a claim being made. For medicines and medical devices, therapeutic claims must be consistent with the approved indication(s) (for medicines) or the listed intended purpose (for medical devices).

## **RESPONSE FROM ADVERTISER, EARTH WAVES**

In this response there are both areas to settle and defend.

EarthWaves is a small home based business that provides a service to survey domestic electromagnetic fields and provide information on them to reduce the EMF environment of the client. Information is given to show which devices and appliances emit EMFs and their strength and location of fields. It is not the intention of EarthWaves to mislead or misdirect people with this issue. In fact, my standing as is often mentioned to clients, is that I wish to provide a service to those that are already aware of EMFs in their environment and it is not my desire to cajole, convince or argue these issues. Most of my clients are electrosensitive and aware of their environment prior to contacting me. I am therefore selective about how my information is made available.

EarthWaves leaflets have only been available for those that have already come forward to understand more and there are probably less than 100 in circulation. This leaflet has never and will never be given to the unaware public through letter box drops or similar methods. I am understanding that not everyone is aware of EMFs and wish to only provide support and provide information for those that wish to increase their awareness of EMFs as is mentioned in the leaflet.

In this response I have attempted to cover the areas of the complaint to the best of my ability and if I have misrepresented, misinterpreted or omitted anything, please return with any specific questions or where any input is required. I wish to address this important complaint to the fullest so that I can move forward with my business in the most productive way.

### **Principle 1**

#### **Defending the use of the word 'harmful' (the word occurs only in the following sentence)**

*"EarthWaves conduct detection services to identify harmful EMFs providing you with a comprehensive report and work with you to reduce, eliminate or shield your family from electro pollution."*

The complaint that principle 1 is breached to use fear mongering pseudoscience regarding harmful EMFs can be countered with a plethora of information relating the science of EMF and health related issues as being extremely well established around the world. There are uncountable amounts of information in the public domain from many very credible sources that pertain to this subject.

In fact the International Agency for Research on Cancer as part of the World Health Organisation classifies RADIOFREQUENCY ELECTROMAGNETIC FIELDS AS POSSIBLY CARCINOGENIC TO HUMANS. This means that RF EMFs are a class 2B in the same category as lead, DDT and Methylmercury compounds to name just a few.

Reference link here. [https://www.iarc.fr/wp-content/uploads/2018/07/pr208\\_E.pdf](https://www.iarc.fr/wp-content/uploads/2018/07/pr208_E.pdf)

To cite just a few other examples of studies to support the health effects from EMFs, here are some links from thousands that are available that contribute health issues to EMFs:

### **American Academy of Pediatrics**

**Here are over 150 letters from various scientists and doctors written to various schools, agencies, etc. warning about the dangers of Wi-Fi in school.**

[https://drive.google.com/file/d/0B2oWg9jNIPa9cUtHYzJURFpUZG5TaUxTLTBfOGtnbHM1dXpR/view?fbclid=IwAR0AHgKNPTLay8zRwKSgqnBZuDtyYBNgUmMn6gQq9Yy7q7t\\_ZTGjgPucRp](https://drive.google.com/file/d/0B2oWg9jNIPa9cUtHYzJURFpUZG5TaUxTLTBfOGtnbHM1dXpR/view?fbclid=IwAR0AHgKNPTLay8zRwKSgqnBZuDtyYBNgUmMn6gQq9Yy7q7t_ZTGjgPucRp)

### **Risk of brain cancer from exposure to radiofrequency fields in childhood and adolescence - EU Research**

<https://cordis.europa.eu/project/rcn/89894/reporting/en>

### **Early Research on the biological effects of microwave radiation**

[https://www.magdahavas.com/wp-content/uploads/2011/02/Early\\_Research\\_on\\_the\\_Biological\\_Effects\\_of\\_Microwave\\_Radiation\\_1940-1960.pdf](https://www.magdahavas.com/wp-content/uploads/2011/02/Early_Research_on_the_Biological_Effects_of_Microwave_Radiation_1940-1960.pdf)

### **Link to bibliography of more than 2000 documents prior to 1972**

<https://magdahavas.com/pick-of-the-week-1-more-than-2000-documents-prior-to-1972-on-bioeffects-of-radio-frequency-radiation/>

### **Link to the Bioinitiative 2017 report.**

A report by 29 independent scientists and health experts from around the world about possible risks from wireless technologies and electromagnetic fields.

<https://bioinitiative.org/>

### **<https://emfscientist.org/>**

The International EMF Scientist Appeal serves as a credible and influential voice from EMF (electromagnetic field) scientists who are urgently calling upon the United Nations and its sub-organizations, the WHO and UNEP, and all U.N. Member States, for greater health protection on EMF exposure.

As of January 1, 2019, 247 EMF scientists from 42 nations have signed the Appeal.

<http://www.wifi-in-schools-australia.org/p/health-effects.html>

**With this information I therefore defend the complaint about the use of the word ‘harmful’. However, I recognise the context and will therefore place the word ‘possibly’ in front as per the World Health Organisation phraseology. Therefore stating that EMFs are ‘possibly harmful’.**

### **Defending the use of the word ‘Diagnose’ and its variations.**

*It is claimed that EarthWaves can ‘diagnose’ EMF as the cause of medical conditions.*

The word ‘Diagnose’ is used in the context that EarthWaves can detect and ascertain where the origin of an EMF is, its power strength, its frequency and timing, just as a mechanic can diagnose a fault on a car using diagnostic equipment. It does not infer that EarthWaves can diagnose an illness or determine the identity of a disease or other health related issue to a specific EMF. The leaflet uses the word diagnose as a header for the process we follow to **Diagnose** (the EMF emission), **Distance** (create a distance from the EMF emission), **Deactivate** (turn off where possible the emitting device/appliance) and **Defend** (to shield from emissions that cannot be turned off or moved away)

The other use of the word ‘diagnosis’ is used in this sentence “Typically, following diagnosis, there are usually a number of things we can remediate quickly and easily simply by moving away to distance ourselves from the source, or by simply turning it off. Some EMFs may require to be filtered to reduce their strength and therefore their health impact.”

**This statement I will defend, however I will amend the wording to include “and therefore their possible health impact”. (The word ‘possible’ has been added)**

### **Rule1(b) Breach**

#### **Quotes as raised by the complainant.**

*“work with you to reduce, eliminate or shield your family from electropollution”*

Electropollution is a word that is recognised in the Oxford English dictionary and states that *“Electromagnetic radiation present in the environment as a result of the transmission and use of electricity, radio waves, etc., considered in terms of its possible adverse effects.*

I defend my statement as a reasonable and accurate meaning of my services. Electropollution is a documented and publicly available in its wording and present in the everyday lexicon.

*“The modern home is now awash with electric, magnetic, and high frequency radiation.”*

I defend this statement as being a true and accurate statement. Many homes now have multiple WiFi signals emitting microwave radiation (2.4GHz and 5.8GHz), many wireless devices, cordless phones, alarms, smart speakers, smart meters, cell phones, smart TVs, microwave ovens, computers, laptops, tablets, lighting, kitchen appliances, power tools and many other electrical and electronic devices that ALL produce EMFs. Layer upon layer of electromagnetic radiation is present in the environment as a result of manmade technologies. All cities, buildings, work places, shopping malls, restaurants, schools, hospitals, nursing homes etc are all saturated with EMFs. To not be able to state this fact is dismissive of the very issue of electropollution and purposely suppressing valid important information from the public.

*“A wifi classroom is like the inside of a microwave oven set at very low power”*

This is a quote from Dr Magda Havas who is a US expert in EMFs. (B.Sc in Biology, PhD in Environmental Toxicology) Magda Havas has conducted many peer reviewed published studies on health issues with EMFs. Information is available here : [www.magdahavas.com](http://www.magdahavas.com)

I defend this statement on the grounds that it is a true and accurate statement and only perception from misinformation causes it to be construed as being misleading.

The statement compares two prevalent everyday devices in terms of power requirement. To be specific, WiFi continuously transmits a signal at 2.4 GHz the same frequency of a microwave oven at 2.45 Ghz. Where it is very well known that microwave ovens use higher power for cooking, it is also very well known that WiFi uses lower power in the transmission signal. So the statement is factually correct and the frequencies and power consumption of these devices are stated on their consumer information labels.

Comparing WiFi and microwave ovens is like comparing fat levels in lamb to fat levels in ostrich meat. Its the same type of fat, just a different amount per kilo. WiFi and microwave ovens use the same power source and the same electromagnetic frequency. There is no conflict with this statement only a perceived connotation of the comparison.

“recognition of the dangers from exposure”

**This statement I settle with and agree to remove.**

“EarthWaves are committed to providing support for those that wish to increase their awareness and work towards identifying, reducing and shielding themselves from this increasing threat”

**This statement I will settle and reword by taking out the words ‘increasing threat’ to “EarthWaves are committed to providing support for those that wish to increase their awareness and work towards identifying, reducing and shielding themselves from possibly harmful EMFs”.**

## Principle 2

Principle 2 is breached, as the claims that EMF can cause these medical conditions, and that EarthWaves can detect the cause of these conditions and address the problem, appear to not be truthful and are likely to be misleading to consumers. The claims also play on consumers’ fear and exploit their lack of knowledge about Electromagnetic Frequencies.

As mentioned above in principle 1.

As mentioned above also, I restate that I do not claim to detect the cause of medical conditions nor claim that I am able to address the problems of health.

A lack of knowledge about electro magnetic frequencies in their own environment by a member of the public is not the responsibility of a service provider. All information about electromagnetic frequencies is in the public domain and for those that wish to understand this issue the information is very accessible. I maintain that my leaflet is informing a reader about the potential need to be aware of EMFs and that a choice to be aware and learn more is available.

**With these comments I defend that principle 2 has not been breached.**

**Rule 2(a) is breached, as the claims made in this flyer are not accurate and have not been substantiated.**

**This paper covers in the previous texts the response to this breach concerning accuracy and substantiation.**

**In closing**

In my time undertaking EMF surveys I have only ever had one person approach me who openly confessed to not believing in EMFs upon which we had a casual conversation. Conversely I have had hundreds of people who have openly supported the services I offer and on a number of occasions I have taken calls or been approached and personally thanked for the work that I do. The service that I provide is far from scaremongering and fear creating, it is empowering and projecting a level of understanding of the environment in which we live that many people crave. I find it incumbent that I act to share such vital information so that we can all make the right and appropriate choices for ourselves and our families.

#### **ADDITIONAL INFORMATION PROVIDED BY ADVERTISER, EARTH WAVES**

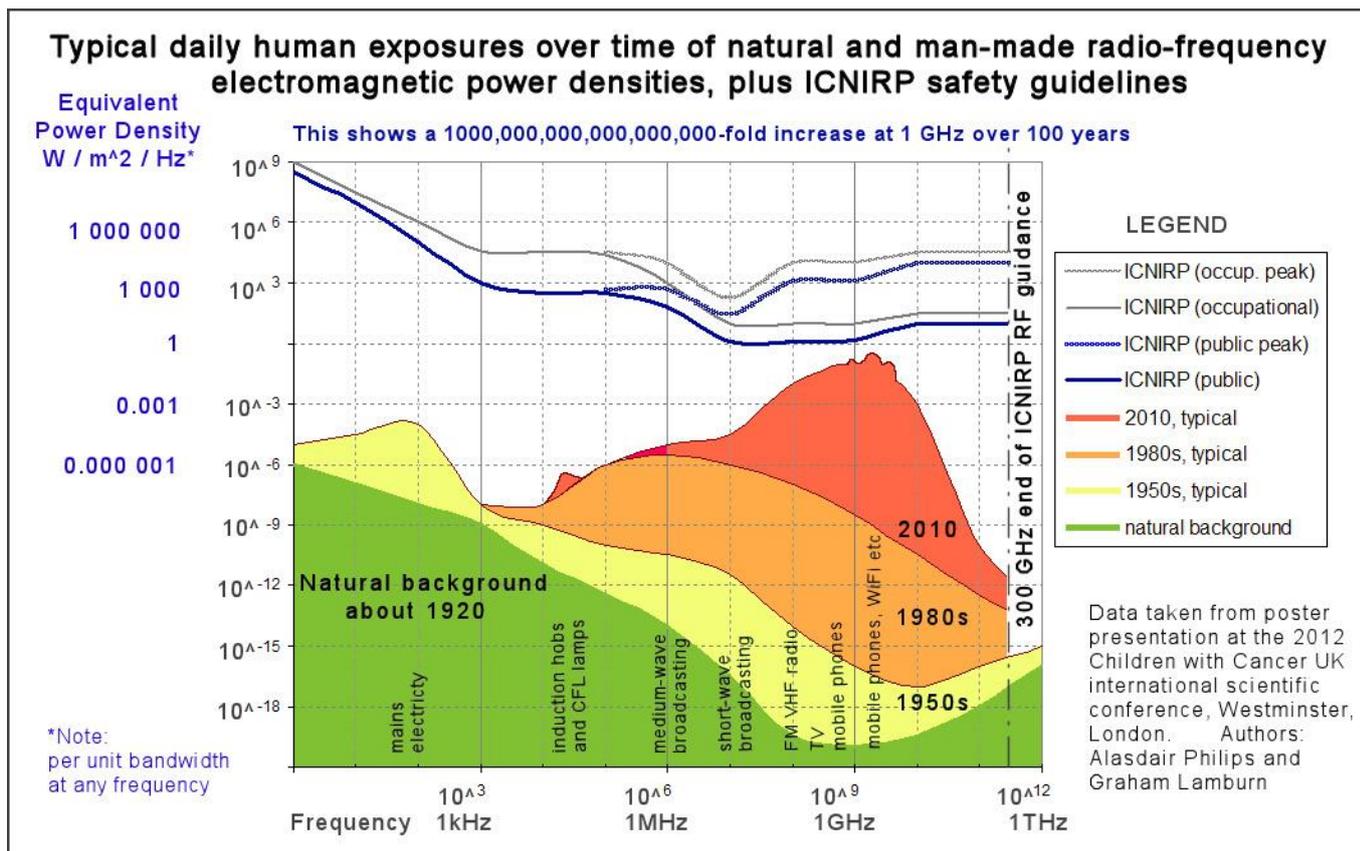
##### **Quote regarding EMF exposure is 100 million times higher**

This open access paper published in The Lancet is written by *\*Priyanka Bandara*, Oceania Radiofrequency Scientific Advisory Association, Scarborough, QLD 4020, Australia; and *David O Carpenter* Institute for Health and the Environment, University at Albany, Rensselaer, NY, USA covers the amount of manmade electromagnetic radiation in the environment and how it has increased over time. In this paper it actually quotes the estimate at 1 quintillion times more. This figure is much larger even than my quote from [EMFnews.org](http://EMFnews.org) at 100 million. Copy of the paper is attached and link pasted here [https://www.thelancet.com/journals/lanplh/article/PIIS2542-5196\(18\)30221-3/fulltext](https://www.thelancet.com/journals/lanplh/article/PIIS2542-5196(18)30221-3/fulltext)

Extract from the paper:

"Due to the exponential increase in the use of wireless personal communication devices (eg, mobile or cordless phones and WiFi or Bluetooth-enabled devices) and the infrastructure facilitating them, levels of exposure to radiofrequency electromagnetic radiation around the 1 GHz frequency band, which is mostly used for modern wireless communications, have increased from extremely low natural levels by about 10<sup>18</sup> times ([figure](#)). Radiofrequency electromagnetic radiation is also used for radar, security scanners, smart meters, and medical equipment (MRI, diathermy, and radiofrequency ablation). It is plausibly the most rapidly increasing anthropogenic environmental exposure since the mid-20th century, and levels will surge considerably again, as technologies like the Internet of Things and 5G add millions more radiofrequency transmitters around us."

Also this graph extract from a 2012 Children with Cancer UK international scientific conference held in Westminster, London written by Alasdair Philips and Graham Lamburn with added commentary covering the same exposure levels at 1 quintillion times.



This paper written by Dr Olle Johansson of the Karolinska Institute in Sweden (which is attached) mentions this exposure limit on page 13.

This value is also mentioned here:

<http://www.emfprotectionstore.com/content/page/electrosmog-warning-insane-radiation-levels.html>

### Evidence covering symptoms.

This paper covers the health effects and symptoms with associated EMF frequencies and exposure power density with references cited.

I'd also like to cite the Bioinitiative Report as this covers a large collection of worldwide studies and associated symptoms. It is a large file so instead of emailing the document, it can be downloaded at this site. <https://bioinitiative.org/table-of-contents/>

There is also a large range of symptoms from EMF studies listed here.

<http://www.justproveit.net/studies>

And for a reference from New Zealand, here is a link to a list of health related studies from Dr Neil Cherry who was an environmental scientist at Lincoln university.

### APPEAL INFORMATION

According to the procedures of the Advertising Standards Complaints Board, all decisions are able to be appealed by any party to the complaint. Information on our Appeal process is on our website [www.asa.co.nz](http://www.asa.co.nz). Appeals must be made in writing via email or letter within 14 days of receipt of this decision.