

October 11, 2013

The Honourable Rona Ambrose, P.C., M.P.  
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Dear Minister Ambrose,

Further to my letter of July 24 (attached), I had hoped to discuss C4ST's concerns over the process that Health Canada is using to update Safety Code 6, the guidelines for safe limits of wireless radiation in Canada. Based on further research and investigation, we are more convinced than ever that the process is broken and in need of a complete overhaul.

The response to an Access to Information request has come to our attention that contains a letter from Heather Van Dusen, Senior Policy Analyst, Health Canada to Mr. Geoff Flynn, Chair, Committee on Expert Panels, for the Royal Society of Canada. This letter provides further evidence of the lack of independence of the Royal Society's expert panel. The Oct. 5, 2012 memo contains a list of eight suggested panel members. Unfortunately, the names are redacted, but the issue remains, how can this truly be an "independent" panel if the government is involving itself in this manner?

The letter, authored by Ms. Van Dusen, also suggests that the government is attempting to exert a level of control over the process, which is demonstrated by the following question: "Are the documents being reviewed by Expert Panel members treated as confidential – i.e. they aren't shared beyond the panel membership?" Dialogue such as this only increases our concern that the process is neither open nor transparent. It should be noted that Health Canada has never issued a full and complete monograph of any updates to Safety Code 6, which is a necessary component of truly peer-reviewed transparency.

In our July letter, we also outlined our concerns that the Chair, Dr. Daniel Krewski, who resigned amid conflict of interest allegations, yet was still defended by the RSC. We also reiterated our concerns about four other panel members. In its most recent response to our inquiries, the Royal Society has stated: "In the interim, the RSC will not otherwise comment further on the work of the Expert Panel on Safety Code 6 until the panel's final report has been completed, peer-reviewed, and submitted to Health Canada."

However, extremely relevant questions remain with respect to Dr. Krewski. Is he still a member of the panel and is he interacting with other panel members? Are his studies part of the scientific evidence being reviewed? In addition, records show that Dr. Krewski had been involved in all recent evaluations of Safety Code 6, putting these results in question as well.

In that same letter, Minister, we also expressed concern that Dr. John Moulder has testified that he earned hundreds of thousands of dollars from electric utility companies acting as an expert witness denying the health risks of overexposure to electrical radiation.

Recent announcements from the Royal Society have not allayed our concerns. On Sept 27, 2013, Mr. R. MacDonald, Interim Officer, Communications and expert panels, Royal Society of Canada (RSC), sent notification that two more panel members had resigned and a new chair had been appointed. One of the resigning panel members, Dr. Lemyre, is listed as an executive of Risk Science International, the same company that had the contract with Industry Canada, and that Dr. Krewski did not declare, leading to his resignation. However, the RSC continues to ignore these fundamental conflicts and stated Dr. Lemyre was "unable to continue with the project for personal family reasons and academic commitments." While the new panel members may not be as visibly conflicted, the concern is whether they have the in-depth expertise necessary to balance the other severely conflicted, and publicly vocal, panel members.

The 1999 Safety Code 6 guideline contained the following statement, Section 2 page 11: "Certain members of the general public may be more susceptible to harm from RF and microwave exposure." However, this statement no longer appears in the guideline. Responses to ATI requests resulted in the following statement from Health Canada: "Please note that our office of primary interest, Healthy Environments and Consumer Safety Branch- Environmental and Radiation Health Sciences Directorate (HECSB- ERHSD) at Health Canada has confirmed that there are no e-mails or written correspondence on why the sentence 'Certain members of the general public may be more susceptible to harm from microwave exposure' was removed." What science-based evidence caused this change in the guideline? Again, we are concerned about the lack of transparency.

It appears that agencies and organizations have lost faith in Safety Code 6. On Sept 6, 2013, the Health and Public Policy Advisory Committee [HPPC] of the Royal College passed a motion to share the information and concerns about harmful EMR and electrosensitivity with the Royal College of Physicians and Surgeons of Canada, the Canadian Pediatric Society, the Public Health Society of Canada and the Canadian Task Force on Early Brain and Biological Development and Early Learning. On August 15, 2013, the Elementary Teachers Federation of Ontario (ETFO) - reportedly the largest teachers' union in Canada - passed a resolution to study the effects of non-ionizing electromagnetic radiation, which is the potentially harmful radiation emitted by cellphones. A report is due on the matter in February, 2014.

Further, on May 9, 2013, the Council of the City of Thorold passed a resolution urging Health Canada to re-evaluate the safety limits contained in Safety Code 6 that relate to radiofrequency exposure. Milton, Mississauga and Oakville Ontario have all passed motions requiring setbacks for cell towers located in residential areas or moratoriums on new tower placements, or both. There is growing and undisputable concern about EMR across Ontario, and the nation.

As you know, many organizations use Safety Code 6 as the default guideline for the safe limits of wireless radiation exposure. Most school boards in Canada are not only deploying Wi-Fi in their classrooms to students of all ages, but are even hosting "bring your own device" days. We are very concerned about the potential negative health effects that may be caused by these developments in Canada's schools.

Many provincial energy organizations are defaulting to Safety Code 6 in the use of smart meters on all residences and when establishing Wi-Fi grids. Cell tower antennae are being located only a few metres from children's bedrooms. Cities and towns are deploying Wi-Fi in public libraries. Finally, baby monitors and portable phones are positioned near cribs and children's beds, which constantly emit microwave radiation. As you know, Safety Code 6 has not had a major update since the 1980's, despite massive technological changes since that time. We realize that it is difficult for government policy to keep current with the rapid advancement of technology. We

also realize that it is difficult to find experts without some financial connections and pre-conceived ideas. However, this panel chosen by the Royal Society is conflicted to the point that it will not have any credibility when it does issue its "independent" report.

It is our continued recommendation that the current panel selected by Health Canada and the Royal Society be disbanded and replaced with a truly independent panel that will review the science based on its merits. Canadians deserve and are depending on nothing less.

We very much appreciate you taking the time to address and respond to our concerns. Like us, we know that you want to ensure that Canadians are kept safe and healthy, and we hope that we can work with you to meet that common objective.

Sincerely,



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cc: Mr. Terence Young, MP Oakville, Ontario