

Minister of Health



Ministre de la Santé

Ottawa, Canada K1A 0K9

AUG 18 2017

Mr. Frank Woodcock  
35 Tyrell Street  
Simcoe, Ontario N3Y 2H2

Dear Mr. Woodcock:

This is in response to your environmental petition no. 399 of April 7, 2017, addressed to Ms. Julie Gelfand, Commissioner of the Environment and Sustainable Development (CESD).

In your petition, you raised concerns regarding the use of the best available science related to electromagnetic radiation. I am pleased to provide you with the enclosed response.

I appreciate your interest in this important matter.

Yours sincerely,

A handwritten signature in blue ink that reads "Jane Philpott".

The Honourable Jane Philpott, P.C., M.P.

Enclosure

c.c. Ms. Julie Gelfand, CESD

## Health Canada response to Petition #399

### Question 1:

**It is 2017, a time for openness and transparency, will the Minister of Health produce the scientific “weight of evidence” used to support Safety Code 6 and will the Minister guarantee the studies produced follow conflict of interest guidelines?**

### Response:

Regarding “weight of evidence”, please see the response Health Canada provided to a similar question in petition No. 365:

[http://www.oag-bvg.gc.ca/internet/English/pet\\_365\\_e\\_39688.html](http://www.oag-bvg.gc.ca/internet/English/pet_365_e_39688.html)

In addition, for further background, attached is the *Safety Code 6 (2015) - Rationale* document.

It is in the best interest of the scientific community, as well as the general public, to address conflict of interest in order to avoid jeopardizing the integrity of the research findings. Federal public servants are subject to the conflict of interest guidelines contained within the *Values and Ethics Code for the Public Sector* and organizational policies, such as the *Health Canada Scientific Integrity Policy*, while undertaking their assessment of the scientific studies used in developing the Safety Code 6 guidelines. As for the studies written by researchers external to the federal government, most research/academic institutions have their own conflict of interest guidelines.

An accepted method to support bias-free analysis and quality research results is to subject scientific conclusions to external study and peer-review. Further to the Standing Committee on Health recommendations published in December 2010, Health Canada contracted the Royal Society of Canada (RSC) to convene an Expert Panel to provide assurance that the results of emerging research relating to the safety of radiofrequency (RF) energy on human health were accurately reflected in the revised Safety Code 6. The Expert Panel of the RSC released their review in March 2014, concluding that, in the view of the Panel, there were no established adverse health effects at exposure levels below the proposed limits. Feedback received from the RSC as a result of their Expert Panel review was incorporated into the published Safety Code 6.

Consistent with Health Canada’s commitments in relation to transparency and openness in its decision-making, and in recognition of public interest in issues related to RF energy, Health Canada undertook a public consultation on the proposed revisions to Safety Code 6 in 2014. Health Canada welcomed feedback from interested Canadians and stakeholders; however, given the scientific basis of Safety Code 6 guidelines, only feedback of a technical/scientific nature was considered in the development of the final revised Safety Code 6.

The revised Safety Code 6, which was published in 2015, as well as the summary of consultation feedback is available on Health Canada's website at the following location: [http://www.hc-sc.gc.ca/ewh-semt/pubs/radiation/radio\\_guide-lignes\\_direct/index-eng.php](http://www.hc-sc.gc.ca/ewh-semt/pubs/radiation/radio_guide-lignes_direct/index-eng.php).

**Question 2:**

**Has the Minister of Health considered that there may be individuals providing her with EMR advice that have a conflict of interest?**

**Response:**

Federal public servants are subject to the *Values and Ethics Code for the Public Sector* and directed to complete declarations if they believe they may be in a 'potential', 'real' or 'perceived' conflict of interest. They must also respect organizational policies, as mentioned above. Acceptance of these values and adherence to the expected behaviours is a condition of employment for every public servant. More information on the Values and Ethics Code is available here: <https://www.tbs-sct.gc.ca/pol/doc-eng.aspx?id=25049>

Concerns were raised in 2013 with the RSC's Expert Panel selection process regarding an undisclosed conflict of interest from the original chairperson. The RSC has detailed conflict of interest guidelines to support decision-making respecting individuals' participation on expert panels. Since the composition of the Expert Panel remained under the responsibility of the RSC, they took the appropriate steps at the time to rectify the situation.