

July 16, 2014

The Honourable Rona Ambrose, P.C., M.P.
Health Canada
Brooke Claxton Building, Tunney's Pasture
Ottawa, Ontario K1A 0K9



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Dear Minister Ambrose,

It is unfortunate you were not able to join us at our conference on July 9th. Thank you for sending your well wishes. I would welcome the opportunity to meet with you to review the information presented in either Calgary or Ottawa, whichever is convenient.

While offering public input on Safety Code 6 for the first time is a considerable improvement, we believe there are several underlying issues with the current update for Safety Code 6. Under separate letters, the following submissions have been made from various sources.

- Over thirty five Canadian physicians signed a submission calling for Health Canada to assist Canadian physicians in becoming apprised of microwave exposure and related health problems that may be associated with over-exposure or sensitivity.
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- Over 50 international scientists who do research in the field of wireless radiation signed a declaration stating that Canada's Safety Code 6 Guideline is fundamentally flawed.
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- The MD's and scientists all state that the current levels of Safety Code 6 do not protect Canadians and called for Health Canada to do a more complete review. They also called for Health Canada to minimize exposure to wireless radiation, especially among children.
- A review that identifies 140 studies that show harm at levels significantly below Safety Code 6 that have not been reviewed by Health Canada in its recent update.
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- 104 (74%) of the 140 publications referenced above were submitted to Health Canada in 2013 and ignored by staff. They have been resubmitted.
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- Health Canada's public input was by email only. C4ST independently organized, staffed and funded an event in Ottawa on July 9th to ensure that all Canadians have a chance to voice their concerns about Safety Code 6. Delegations were recorded from about 30 of the 200 Canadians present at the meeting, plus some of those who video-conferenced in. These were submitted to Health Canada by the July 15th deadline.
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- On October 28, 2013, the Royal Society of Canada hosted a public hearing on *Safety Code 6 Limits of Human Exposure to Radiofrequency Electromagnetic Energy (wireless radiation safety)*. Twenty-three experts included documents as part of their submissions. Representatives from the Royal Society told C4ST that they would send all submissions to Health Canada. Health Canada's Safety Code 6 (2014) Rationale document does not acknowledge many of these submissions nor the publications that are included and referenced.
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- Summary comments written by two of the peer reviewers of the Royal Society Report referenced above. Dr. Anthony Miller, Professor Emeritus, Dalla Lana School of Public Health, University of Toronto and Visiting Senior Scientist in the Monographs programme in IARC September 2011-January 2012 and Dr. Martin Blank, Special Lecturer, Columbia University both state that the Report failed in its obligation to the public.
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- The Bioinitiative 2012 Report is not given the proper analysis and consideration it deserves. The Bioinitiative Working Group prepared a comprehensive review of the radiofrequency/microwave radiation literature in 2007, much showing adverse biological effects well below the current and proposed Safety Code 6 levels. This was updated in 2012 with inclusion of a further 1,800 publications. The Bioinitiative 2012 Report was prepared by 29 authors from ten countries, (Sweden (6), USA (10), India (2), Italy (2), Greece (2), Canada (2), Denmark (1), Austria (2), Slovak Republic (1), Russia (1)); ten holding medical degrees (MDs), 21 with PhDs, and three with an MSc, MA or MPH. Among the authors are three former presidents of the Bioelectromagnetics Society, and five full members of BEMS. One distinguished author is the Chair of the Russian National Committee on Non-Ionizing Radiation. Another is a Senior Advisor to the European Environmental Agency.
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- A 300+ page document prepared by the Bioinitiative Working Group which provides commentary and references to studies overlooked by both the Royal Society of Canada Report of 2014 (RSC (2014)) and the Scientific Committee on Emerging and Newly Identified Health Risks Opinion (European Commission Directorate General for Health and Consumers, Luxembourg) in its recent *Preliminary Opinion on Potential Health Effects of Exposure to Electromagnetic Fields (EMF) Report* (SCENIHR (2013)).
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- Corrections to Health Canada's "Busting Myths on Safety Code 6" posting on your website. Emails sent to Canadians contain some of this misleading and incomplete information.
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Minister, for over two years now, C4ST has expressed concerns over the process that Health Canada is using to update Safety Code 6. The current circumscribed Health Canada evidence base allegedly supporting draft Safety Code 6 is lacking a great deal of information, demonstrating the potential for significant harm from low levels of radiofrequency/microwave radiation. It is necessary to follow modern, established, international best practices to achieve a comprehensive, transparent and systematic review in environmental health.

In the absence of a complete evidence base, it is impossible that Health Canada has founded Safety Code 6 on a "weight of evidence" as claimed. Given the absence of studies showing harm, and suggestions of bias in selection of evidence, we believe that Safety Code 6 as it stands will not protect the health of Canadians.

Minister, projections are that there will be 50 billion wireless devices worldwide by 2019 which equates to over 20 devices per Canadian home. If history repeats, that is about the time of the next update for Safety Code 6. Currently, China, Russia, Italy and Switzerland have better wireless radiation safety standards than Canada. The time is now to invest the proper resources and ensure that Safety Code 6 offers the protection Canadians require and expect.

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,



Frank Clegg
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cc: Mr. Terence Young, MP Oakville