

Dr. Yolande Grise,
President
Royal Society of Canada
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May 23, 2013

Re: Conflict of Interest on the Expert Panel Review of Safety Code 6: Potential Health Risks of Radiofrequency Fields from Wireless Telecommunications Devices.

Dear Dr. Grise,

We are a national organization promoting the safe use of wireless technology. Our membership and Board of Directors are comprised of Canadian scientists, internet technology executives, industry analysts, legislative researchers and lawyers, among others.

We are aware that the Royal Society of Canada has been contracted by Health Canada to provide an independent review of its latest update to Safety Code 6 and to examine whether it protects Canadians from exposure to microwave radiation.

With great respect to the Royal Society of Canada and its esteemed history in our country, and to your credentialed body of selected panelists, we are extremely concerned that your panel is unfairly balanced and many members hold conflicts of interest that fail the Royal Society's published guidelines for panel selection.

In general, the reviewers you have selected:

- 1. Have financial connections to the propagation of wireless technology.**
- 2. Hold publicly stated positions denouncing those who experience human health effects.**
- 3. Are reviewing their own work, which has been used to influence Health Canada to maintain Safety Code 6 at levels that ignore non-thermal biological effects.**
- 4. Together form a panel that is imbalanced against the protection of public health, and funded by the wireless industry.**

Your Chair, **Daniel Krewski** has such well documented and admitted ties to the wireless telecommunications industry that he fails qualification under section 5.3 – *Conflict of Interest* – in your [Manual of Procedural Guidelines for Expert Panels](#).

According to Health Canada's Terms of Reference this panel is to provide, "...*independent expert assessment of the review of Safety Code 6.*" Your selected panel is so deeply conflicted, both financially and ideologically, as to negate any potential for "*independent review*".

Your panel is imbalanced by a subset of scholars who publish together and speak publicly denying the health effects of wireless devices. One has publicly called for an "end to risk research on this subject". Others including your Chair have participated in an [unscientific 'promotional' video](#) suggesting human fetuses not be protected from levels of wireless radiation shown to cause biological effects. This imbalance contravenes Section 3.1 of your Guidelines regarding "*Composition and Balance in Panel Profile.*"

Canadians cannot expect an unbiased analysis when so many conditions of conflict are present. We are concerned the results are pre-determined.

CBC Television ([CBC-TV Marketplace Nov 25, 2003](#)) highlighted your Chair, Daniel Krewski, overseeing public research into the health effects of microwave radiation while also serving as Director of a research institute created and funded by the Canadian Wireless and Telecommunications Association. This is the primary lobby group representing Canada's wireless industry and is assigned to promote the interests of its industry members, not better health for all Canadians.

In addition, Mr. Krewski participated in an unscientific [video produced by Health Canada](#) in which he makes the prejudicial statement: "*Of the literally thousands of papers that have been written on this topic, very few have suggested health concerns.*" The fact is there are literally thousands of papers written on this topic that document biological changes in living beings.

The issue is not the quantum of studies that suggest health concerns, it is the quality of those studies. Health Canada's own expert [Dr. James McNamee has testified under oath](#) that "... ***there are studies showing effects, no question.***" ([Prov of Que Superior Court, White Vs Village of Chateaugay, Feb 18, 2013](#)). Instead of describing these studies, Mr. Krewski downplays them which in our view reveals his bias against public health protection.

The studies showing health concerns are in fact so reliable that the [World Health Organization and IARC placed wireless radiation on the Class 2b list of possible Carcinogens](#).

Mr. Krewski also opined in the Health Canada video production that non ionizing radiation from wireless devices cannot cause DNA alteration. In fact there are studies published in major journals that consumer wireless devices cause DNA damage and that levels of non-ionizing radiation below current guidelines cause cancer in laboratory animals. Mr. Krewski's scholarly reviews have been supplied to Health Canada, and are relied upon for revisions of Safety Code 6, rendering him ineligible because he is reviewing his own work as a key part of this exercise.

You have also selected **Kenneth Foster**. Mr. Foster's work has been used by Health Canada to uphold its outdated safety limits and refute health complaints from children with symptoms related to wireless internet systems in Canadian schools. He has spent his career denying the health effects of non-ionizing radiation. Mr. Foster made an outlandish argument on this subject in a British scientific journal, when he claimed "Guidelines need to be established for halting risk research." ([Foster: "Microwaves: the risks of risk research" Nature 1987](#)).

This position places him in a deep conflict when asked to review scientific work that he has publicly stated should not continue.

Another among your selection is **Frank Prato**. Mr. Prato is on record testifying to the Parliamentary Standing Committee on Health in October 2010 employing the unscientific argument that School Boards should not curtail unlimited microwave exposure of children simply because they are exposed in other places at other times of the day. ([Parliamentary Standing Committee on Health Oct 28, 2010](#).) His public propagation of this ideological and unscientific position should disqualify him from the panel.

Mr. Prato also participated in the [Health Canada video](#) that suggests women may expose their fetuses to wireless radiation without caution. There is no scientific research to suggest this is safe. Mr. Prato's comments are used in the section of that video that shows a pregnant woman and says any amount of microwave radiation that doesn't heat her body is safe. This message reveals that Mr. Prato holds a prejudicial viewpoint against published science documenting non-thermal biological affects, which under Sect. 5.3 of your Guidelines for Conflict of Interest, "could impair the individual's objectivity," and should also thereby disqualify him as a panelist under your rules.

Mr. Prato has also supplied a significant number of opinion papers on this topic to Health Canada that have been relied upon to keep existing limits in place, and thus he will be reviewing his own work. He is therefore significantly conflicted and should not have qualified as a panelist.

You have also selected **John Moulder** of the United States. Mr. Moulder is editor of a scientific journal (Radiation Research) that has published a heavily weighted majority of papers funded by the wireless industry and almost exclusively those showing no harm. He is ideologically conflicted on this point and it has been reported that under court testimony has admitted to earning hundreds of thousands of dollars as an "expert witness" to help refute the claims of people injured from electrical radiation. ([Microwave News: "Radiation Research and the Cult of Negative Results." - July 25, 2006](#).)

You have also selected **Richard Findlay** of the United Kingdom. Mr. Findlay is a physicist who owns "EMFcomp", a sole proprietorship through which he liaises between the wireless industry and government regulatory bodies on matters of radiation safety. Handing him influence over Canada's safety regulations when he earns his living from the industry affected by these regulations is a clear and significant financial conflict of interest according to your published guidelines.

The aforementioned members of your panel make it heavily imbalanced with one predetermined point of view. In Sect. 3.1 of your *Manual of Procedural Guidelines: Assembling the Panel*, it states that “balance concerns the even-handed representation of differing points of view” and it is “preferable to seek members who are not strong proponents of the contending perspective.”

The clear lack of balance on your panel weighted only with scientists who do not acknowledge that microwave radiation causes health effects fails the Royal Society’s own criteria for selecting a panel.

It is significant that most of these panelists have published works together as co-authors of the science that is consistently used to refute statements by public health authorities that wireless devices require caution. Many of your panelists’ cooperative efforts have been relied upon by Health Canada to delay modernizing Safety Code 6. Through their work, Health Canada has resisted recognizing the risks associated with our increased exposure to wireless radiation from the proliferation of wireless technology in consumer devices, especially the risk to children.

This is not a single minor conflict that can be overlooked but rather repeated and sustained conflicts running through the heart of this panel, including its Chair, that suggest it was selected because of its conflicts, not despite them.

There is a distinct lack of separation between the authors of the supporting work and the reviewers. They are one in the same. This panel represents a close knit group of scholars who are vocally casting doubt on the effects caused by over exposure to wireless radiation.

In the last two years the W.H.O. has included wireless radiation on the Class 2b list of possible Carcinogens, the American Academy of Pediatrics has called for stricter radiation safety limits to protect women and children, the American Society of Reproductive Medicine has published evidence of reproductive damage caused by wireless internet systems, The [American Academy of Environmental Medicine has called on school Boards to stop installing blanket wireless internet systems](#) because they risk harming the health of a generation of children. Safety Code 6 is consistently used to justify willful blindness to this trend of precautions.

This review of Safety Code 6 is the conclusion of the 2010 Hearings by the Canadian Parliamentary Standing Committee on Health into the human health effects of microwave radiation from wireless devices. Yet none of the qualified scientists from Canada and other countries who testified that Safety Code 6 is outdated and limited in effectiveness were approached or selected as panelists. Only those who testified that Safety Code 6 needs no revision were selected for your panel.

Nor have any of the North American scientists who have published on the biological effects of microwave radiation been selected for your panel.

By ignoring the Royal Society’s published rules on conflict of interest your selection committee has undermined the integrity of any report to be produced by this panel, as to render it ineffective. It cannot be trusted by the Canadians it was assigned to protect.

In order for the Royal Society to produce an “independent review” **this panel must be dissolved** and a new one selected in a public and transparent process that employs the strict criteria of conflict of interest published in the Royal Society’s Manual of Procedural Guidelines. Failure to do so tarnishes the credibility of the Royal Society and the results of the panel’s review.

Sincerely,

A handwritten signature in black ink, appearing to read 'Frank Clegg', with a horizontal line underneath.

Frank Clegg,
CEO
C4ST - Citizens 4 Safe Technology
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cc: Mr. Terence Young, MP Oakville, Ontario