

March 23, 2015

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

Via email: [Minister\\_Ministre@hc-sc.gc.ca](mailto:Minister_Ministre@hc-sc.gc.ca)



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Dear Minister Ambrose,

As a business leader for more than thirty years and loyal Canadian citizen, I am writing to you out of some frustration. I represent a growing number of Canadians that are disappointed in the government for failing to take into account the most recent science in providing advice on exposures to microwave radiation emitted by common wireless devices as represented in Health Canada's Safety Code 6. Please note this is the fourth letter sent to you on this matter over the past two years.

We have had several meetings with Ministry of Health representatives who hold responsibility for the radiation safety file and are deeply disappointed with the response to date. Dr. Graham Howell who has moved to the Prime Minister's office, Mr. Jess Weiser who has returned to the office of the Minister of Public Works, Mr. Andrew Adams who was on leave for some time and finally a phone conversation with Mr. Clark Olsen. In all the meetings, the feedback we received was that the issues we raise are reasonable. Each attendee took several pages of notes, commented on the complexity of the file and agreed to get back to me. There have been no follow up meetings. Most recently, our request to meet with Ms. Trina Morissette, your recently announced director of policy and stakeholder relations, was declined.

Despite our considerable and respectful effort to engage on the issues, Health Canada's recent announcement of its update to Safety Code 6 fails to note new evidence that we have brought to your attention. Our evidence regarding the poor scientific practices in updating Safety Code 6, and lack of scientific process that was riddled with conflict of interest, has only increased our concern since our July, 2014 letter. As we declared in previous correspondence with your office, it has become evident that the outcome of the current revision to Safety Code 6 was pre-determined.

Without any explanation whatsoever, the revised "safety" code rejects the World Health Organization's determination that exposure to wireless radiation is a Class 2B Carcinogen (May 2011). Since protecting the health of Canadians is Health Canada's mandate, in this case it has failed. In fact, given the evidence its scientists and Directors have received, there is a strong argument that Health Canada is turning a blind eye to an extremely serious and rapidly growing health hazard affecting our country.

Other countries such as France, Israel, Belgium, Taiwan and India have responded to recent scientific evidence and the WHO Class 2B determination by passing laws and regulations that limit wireless exposure to children and pregnant women, and attempting to educate their population about safer use of wireless technology.

In its unexpected announcement of March 13<sup>th</sup>, Health Canada posted on its website that, "Safety Code 6 has always established human exposure limits that are far below the established scientific threshold for

potentially harmful effects.” This is untrue. Safety Code 6 only limits microwave exposure from wireless devices at the “thermal threshold”; when it’s strong enough to heat human skin. The selection of the thermal threshold as a danger point is arbitrary and not scientific. Science has now established, in a large number of legitimate studies, that there is serious and potentially irreparable biological damage from wireless radiation exposure well below the thermal threshold.

It is endangering of public health and safety to see this misleading information published on a government website when the truth is well known among Health Canada senior scientists. When “selling” their Safety Code they have published a misleading statement, but when pressed under oath, Health Canada’s staff has provided the complete story.

In a Quebec Superior Court on 13 Feb 2013, Health Canada Scientist James McNamee stated that Safety Code 6 accounts only for “thermal effects”. However the Royal Society in its evaluation of Safety Code 6 agreed that biological effects including increased permeability of the blood-brain barrier can occur from microwave radiation from a simple Wi-Fi router well below the thermal effect. Therefore either Health Canada’s website is currently misleading Canadians as to the guarantees claimed in Safety Code 6, or Mr. McNamee lied under oath on behalf of Health Canada.

During the same testimony, Dr. McNamee informed the Quebec Superior Court that, “There are a large number that show an adverse effect here, an adverse effect there. So, I'm not denying that there are studies showing effects, no question.”

However the Health Canada website currently denies this. There is a clear message currently published on Health Canada’s website stating: “The limits in Safety Code 6 are based on established, scientific evidence, and provide protection against all known harmful health effects for all individuals.”

Again, either the Health Canada website is deliberately omitting the large number of studies that show wireless radiation causes adverse effects, or Mr. McNamee has lied under oath.

Due to the seriousness of this error, C4ST would like clarification as to which of the above is true. We expect a response this time within 14 days. If Health Canada is aware of a “large number” of scientific papers that show adverse affects of wireless radiation, and Mr. McNamee was not lying under oath, then this information must not be withheld from Health Canada’s website.

Health Canada’s unpublished “weight of evidence” model does not follow standard scientific practices. It is being used to dismiss the strength of evidence of hundreds of studies that show Canadians are harming themselves by not using their cell phones and Wi-Fi systems safely. It appears that if there is only one more study showing no harm over the army of studies showing harm, then Health Canada will state there is no harm. This methodology results in Health Canada misleading Canadians when it suggests there is zero chance of harm even with 24/7 exposure to any number of wireless devices used in close proximity to the body. In our previous letters to you we have requested that Health Canada make public its methodology. This is standard operating procedure in the scientific process. Health Canada is keeping its methods secret. Canadians have a right to know that Health Canada is aware that scientists have proven wireless devices cause harm, but has chosen not to value it.

I can assure you that Dr. McNamee is not alone in his understanding of the many studies showing adverse effects from common wireless devices such as cell phones, tablets and Wi-Fi routers.

On Sept. 19, 2014 two experts in the review of scientific evidence met with Health Canada officials in Ottawa. In summarizing their meeting, they commented that they would give Health Canada an "F" in the review process used to evaluate Safety Code 6.<sup>1</sup> Dr. Moher and Dr. Sears presented several tools, (including software) and processes Health Canada can and should be using. None of these recommendations have been acknowledged or implemented in the recent update of Safety Code 6. In fact, in the meeting, Dr. McNamee commented that the provinces and school boards can always implement their own safety standards. However this is not how Safety Code 6 is presented. It is held up by school Board administrations as an authoritative document that overrules the requests of parents who want Wi-Fi use reduced in their schools to protect their children from this possible carcinogen.

In our July 2014 letter, we referenced 140 studies that Health Canada had omitted in its review of Safety Code 6. While we have not received an official response to our analysis, it is our understanding that a large number of these studies were considered to be in scope and of sufficient quality to be considered in the recent revision of Safety Code 6. How were they reviewed? What impact do these studies have on Safety Code 6? Why are they not mentioned on Health Canada's website today? Proper scientific analysis would include a discussion on how these studies were considered. As a point of reference, these studies show harm at levels significantly below the Safety Code 6 thermal threshold. Cancer is linked in 11 studies, brain/nervous system impacts in 44, biochemical disruption in 65 and 31 show development and/or learning behaviour impacts.

By rejecting or ignoring the "large number" of scientific articles showing adverse affects from wireless devices, Health Canada has placed our country behind others who are protecting their citizens under the strength of this evidence.

In January, 2015 France passed the following articles into law:

- All advertisements promoting cell phones must demonstrate a device to limit the exposure of the head to radiofrequencies emitted by the cellular phones. ( eg. ear buds or speaker mode)
- A campaign "of awareness and information on the responsible and rational use of mobile devices" will be conducted.
- A ban on the use of Wi-Fi in day care centres and nurseries for children less than three years of age.
- Wi-Fi must be deactivated when not in active use for digital educational activities in primary schools with Wi-Fi already in place,
- For primary schools without Wi-Fi, a consultation process is required before installing it.

(Primary schools include pre-school, (ages 2 to 6) and elementary school, (ages 6 to 11))

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<sup>1</sup> Dr. Moher, PhD, Senior Scientist, Clinical Epidemiology, Ottawa Hospital Research Institute; Associate Professor, Department of Epidemiology and Community Medicine, Faculty of Medicine, University of Ottawa; Dr. Moher is a world leader in systematic review of medical research.

Dr. Meg Sears, PhD., Adjunct Investigator, Children's Hospital of Eastern Ontario, Research Institute and Senior Clinical Research Associate, Ottawa Hospital Research Institute

In January, 2015 Taiwanese lawmakers passed new legislation in which:

- Parents face fines who allow children under the age of two to use tablets and smartphones
- Youth under 18 years of age are only allowed devices for a 'reasonable length of time'

As of March 1, 2014, it is illegal to market cell phones to children less than seven years of age in Belgium.

Also in our previous letters to you, we predicted that the Royal Society report was not an independent review of Safety Code 6 and was in fact, a waste of over \$100,000 of tax payer's money since the results were pre-determined. Our predictions turned out to be true as two of the internationally acclaimed scientists who were peer-reviewers, publicly criticized the process and the final report.<sup>2</sup>

Medical professionals and international scientists have publicly submitted that Safety Code 6 is outdated and does not protect Canadians. None of their formal submissions or statements has been acknowledged. There is no evidence that any of this expert opinion was considered in Safety Code 6's recent update.

- In July 2014 over forty Canadian physicians signed a submission calling for Health Canada to assist Canadian physicians in becoming apprised of wireless radiation exposure and related health problems that may be associated with over-exposure or sensitivity.
- Over 50 international scientists who currently research in the field of wireless radiation also signed a declaration stating that Canada's Safety Code 6 Guideline is fundamentally flawed by limiting its danger point at the thermal threshold.
- 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. Instead, Health Canada is now encouraging 24/7 exposure to children, even infants.
- Twenty-three experts from Canada and other countries world-wide, submitted formal documents outlining specific areas of concern, backed by science and/or clinical observations.

Minister, for over two years now, C4ST has expressed concerns over the process that Health Canada is using to update Safety Code 6. We have now been joined by dozens of medical doctors and scientific experts in Canada and around the world. It is clear, that Health Canada's "weight of evidence" approach in analyzing the science is completely outdated and under resourced. It has resulted in a message that is completely untrue: That any amount of exposure to wireless devices is safe "for all age groups, including infants and children, on a continuous (24 hours a day/seven days a week) basis." In fact "a large number of studies" by Health Canada provide evidence to the opposite, according to their own senior scientist when questioned under oath.

Today, most school boards across Canada are implementing Wi-Fi systems, subjecting students of all ages to continuous exposure to radiation based on this misleading declaration by Health Canada. The

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<sup>2</sup> 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.

American Academy of Environmental Medicine states that 3% of students and teachers will be affected in the short term and up to 30% longer term. The Canadian Teacher's Federation has requested, "That Safety Code 6 include a recommendation for prudent use of Wi-Fi whenever possible including the recommendation to limit consistent exposure in schools by turning off wireless access points when not in use." School board trustees naturally rely on Health Canada's Safety Code 6 as the determinant of safety in their decision to install Wi-Fi in all their classrooms and recreation areas. Many have used Safety Code 6 and Health Canada's misleading statements to treat radiation from Wi-Fi and cell phones differently than other substances and agents (lead and DDT) on the WHO Class 2b Carcinogen list, which is a standard reference for prudent avoidance in schools. Similarly, Safety Code 6 is used as the basis for installing smart meters on every home, school and workplace and for installing cell towers near playgrounds, schools, and on apartment buildings.

Minister, we applaud the approach for transparency that you have clearly demonstrated within some of the scope of Health Canada. On behalf of this and future generations, we hope that the Environmental and Radiation Health Sciences Directorate makes your priority list for improvement.

We will appreciate your response as noted, within 14 days.

Sincerely,

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

Frank Clegg  
CEO, Canadians for Safe Technology  
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cc: Mr. Terence Young, MP Oakville