

Consultation response form

Please complete this form in full and return to EMFConsultation@ofcom.org.uk

or:

Spectrum Policy and Analysis
Ofcom
Riverside House
2A Southwark Bridge Road
London SE1 9HA

Consultation title	Proposed measures to require compliance with international guidelines for limiting exposure to electromagnetic fields (EMF)
Full name	Michael Bevington
Contact phone number	
Representing (delete as appropriate)	Organisation
Organisation name	Electrosensitivity UK
Email address	michael@es-uk.info

Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see [Ofcom's General Privacy Statement](#).

Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.	Nothing
Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.	None
For confidential responses, can Ofcom publish a reference to the contents of your response?	Yes

Your response

Question	Your response
<p>Do you agree with our proposal to take steps to mitigate risks related to EMF and be in a position to hold licensees, installers and users to account if issues are identified? Please explain the reasons for your response.</p>	<p>Confidential? –No</p> <p>I do not agree with Ofcom’s proposal to mitigate risks related to EMF by reference to the ICNIRP 2020 Guidelines.</p> <p>The ICNIRP 2020 Guidelines are for short-term (up to 30 minutes) and for heating effects only. These are a minority-viewpoint which is not based on the weight of established scientific evidence. The are still based on Schwan’s mistake of 1953 that heating is the only adverse effect. In 1930 non-thermal effects were established as the primary effect, with heating secondary. These non-thermal effects are accepted by the majority-viewpoint scientists and all the mainstream scientific reviews.</p> <p>Instead of adopting ICNIRP’s unscientific and unprotective short-term heating Guidelines, Ofcom should adopt international long-term and non-thermal Guidelines, such as Bioinitiative 2012, EUROPAEM EMF Guideline 2016, IGNIIR 2018 and Seletun 2010. The USSR adopted non-thermal Guidelines in 1935. It has been established since 1953 that radio frequency radiation causes cancer, and since 1932 that radio frequency radiation causes electrosensitivity and other long-term non-thermal adverse effects such as infertility and cardiovascular and neurological damage.</p> <p>The unscientific and unprotective ICNIRP Guidelines recommended by Ofcom were voted by a substantial majority as obsolete by the European Parliament in 2008. Many other countries have rejected ICNIRP’s unscientific Guidelines, including India, Russia and Switzerland.</p> <p>Many underwriters in the insurance industry regard the ICNIRP Guideline levels as a significant risk. They refuse to provide cover for such electromagnetic levels or do so only as a high-risk category along with other carcinogens such as asbestos.</p>

The obsolete and unprotective ICNIRP 2020 Guidelines based only on short-term heating effects raised the limit to 40,000,000 microWatts per metre squared to allow for 5G.

The appropriate long-term non-thermal guidelines to protect the public should be in the region of the international Bioinitiative Guidelines of 3 microWatts per metre squared. Even this is not guaranteed as safe, since the safe background levels are 0.000001 microWatts per metre squared.

It runs counter to all principles of public health to adopt Guidelines which are limited to an averaged exposure over 30 minutes and concern only short-term and heating effects, not the established long-term non-thermal effects such as cancer and electrosensitivity. Most people near phone masts are resident in their homes or sleeping in their bedrooms for longer than 30 minutes and need protection from the proven non-thermal effects, not just the danger of heating by one degree in 30 minutes.

Studies show that the established long-term and non-thermal effects can be seen or measured by objective biomarkers in 79% of the population. This is some 53 million people in the UK.

Some 1.2% of the population is severely affected by current levels of man-made radio frequency radiation. This is about 800,000 people in the UK, according to surveys, including ones sponsored by the UK government and the phone industry. Even ICNIRP in its principles has accepted that some members of the general population are especially vulnerable to harm from radio frequency radiation at non-thermal levels and therefore need appropriate long-term Guidelines lower than its thermal Guidelines.

The aim of government, including Ofcom, should be to protect the health of the whole population by adopting appropriate long-term and non-thermal Guidelines. It should not be knowingly to cause established effects such as cancers, electrosensitivity, infertility and

	cardiovascular and neurological harm by rejecting the mainstream science and adopting minority, inappropriate and unprotective Guidelines like ICNIRP.
<p>Do you agree with our proposal (a) to include a condition in spectrum authorisations requiring compliance with the basic restrictions for general public exposure identified in the ICNIRP Guidelines; and (b) that this condition should apply to equipment operating at powers greater than 10 Watts?</p>	<p>Confidential? –N</p> <p>See the answer above.</p> <p>The condition in spectrum authorisations should require compliance with the basic restrictions for general public exposure identified in long-term and non-thermal International Guidelines, such as Bioinitiative 2012, EUROPAEM EMF Guideline 2016, IGNIR 2018 and Seletun 2010. Many other countries have adopted non-thermal Guidelines, such as the USSR in 1935.</p> <p>The ICNIRP Guidelines are regarded by mainstream scientists, as well as the European Parliament, as obsolete. The ICNIRP Guidelines are unscientific and not protective according to the robust and established majority-viewpoint scientific weight of evidence.</p>
<p>Do you agree with our proposed guidance on EMF compliance and enforcement? Please explain the reasons for your response.</p>	<p>Confidential? –N</p> <p>See the answers above.</p>

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