



Contact address:

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4th September 2024

Sent Via Email from Eileen O'Connor, Director EM Radiation Research Trust

For the Attention of: Lauren at the United Kingdom Health Security Agency

Cc. Brian Stein CBE Chairman EM Radiation Research Trust
UK Health Security Agency North West
Wes Steeting MP Secretary of State for Health and Social Care
Sarah Jones MP Minister of State for Industry
Cllr. Richard Kemp CBE Mayor of Liverpool
Cllr. June Burns Mayor of Sefton
Cllr. Karen Cavanagh
Cllr. Carol Richards
Cllr. Peter Harvey
Bill Esterson MP
Kim Johnson MP
Cllr. Jane Corbett
Michelle Beard Headteacher Millstead Primary School
Paul O'Brien, Chair of Governors Millstead Primary school

Notice to Agent is Notice to Principal, Notice to Principal is Notice to Agent

That which is not rebutted in law is not denied

Dear Lauren,

The EM Radiation Research Trust Call for a full investigation into the phone mast near Millstead School following the deaths of the two children.

The EM Radiation Research Trust letter addressed to the United Kingdom Health Security Agency on 16th July 2024 called for a full investigation into the phone mast near Millstead School following the deaths of the two children. Many of the concerns raised within this letter have not been rebutted via the response received from the UK Health Security Agency. **That which is not rebutted in law is not denied.** Link to the EM Radiation Research Trust letter is available to download here:

<https://www.radiationresearch.org/uncategorised/the-em-radiation-research-trust-call-for-immediate-investigation-into-phone-mast-near-millstead-primary-school-following-the-deaths-of-two-children/>

In response to your letter dated 30th August 2024, which we hereby rebut, we have noticed that your correspondence does not include your full name and position. Given that there may be more than one

individual by the name of Lauren within the United Kingdom Health Security Agency, it is imperative that we ascertain precisely which Lauren authored the response on behalf of the UK Health Security Agency.

This omission constitutes a violation of the standards of business correspondence and administrative procedures, which may lead to misrepresentation, misunderstandings and undermine trust in public authorities. The absence of this information complicates the identification of the sender and may raise doubts about the authenticity of the document, particularly in light of the Companies Act 2006, Section 44; the Electronic Communications Act 2000, Section 7; and the Civil Evidence Act 1995, Section 8.

In accordance with the Nolan principles <https://www.gov.uk/government/publications/the-7-principles-of-public-life> particularly those of openness and accountability, we kindly request that you provide your full name and the position you hold within the organization. This information is necessary for us to address you correctly and to fully understand your role in this matter.

Secondly, we regard your response to the EM Radiation Research Trust letter as not merely unsatisfactory, but also as a profound affront. Given that our organisation has long specialised in this field and has established a strong reputation through collaborations with renowned experts, scientists, and politicians, we are well-known not only within the United Kingdom but also internationally. It is therefore disappointing that you chose to send us links to resources containing general information on the issue at hand, rather than providing a detailed and accurate representation of the situation.

We pose a set of additional simple questions:

Is it wise to ignore the International Declaration on Human Rights of Children in the Digital Age? This Declaration calls for the protection of children from involuntary exposure to non-ionizing radiation (NIR). This reports provides a large and growing body of independent, peer-reviewed [scientific studies](#) that demonstrated that man-made NIR has adverse biological effects. [The Declaration | ICD \(thechildrensdeclaration.org\)](#)

Is it wise to ignore advice from The UK Stewart Report 2000?

In 2000 the UK Government set up a committee to investigate the impacts of RF/microwave radiation. The committee was chaired by Sir William Stewart, Chairman of the UK Health Protection Agency and formerly Chief Scientific Adviser to the Government. This important investigation called for a precautionary approach due to the scientific uncertainties.

- Section 1.18 There is now scientific evidence, however, which suggests that there may be biological effects occurring at exposures below these guidelines.
- Section 1.19 We conclude therefore that it is not possible at present to say that exposure to RF radiation, even at levels below guidelines, is totally without potential adverse health effects, and that the gaps in knowledge are sufficient to justify a precautionary approach.
- Section 1.42 The beam of greatest RF intensity should not be permitted to fall on any part of the school grounds or buildings without agreement from the school and parents.
- Section 1.53 Children may be more vulnerable because of their developing nervous systems, the greater absorption of energy in the tissues of the head and a longer lifetime of exposure

Is it wise to ignore concerns raised about ICNIRP?

There are concerns regarding government's use of the ICNIRP 2020 radiation guidelines as highlighted in the paper by Einar Flydal et al. (2022) Self-referencing authorships behind the ICNIRP 2020 radiation protection guidelines. This paper concludes: "From our findings we draw the conclusion that the referenced literature used in ICNIRP 2020 to underpin its guidelines is neither varied, nor independent or balanced, and is by no means "consistent with current scientific knowledge", as claimed by ICNIRP 2020 [2 p. 484]. ICNIRP 2020 bases this claim within this small network only, a claim that runs contrary to the majority of biology-oriented researchers and publications within this research field. Hence, our review shows that the ICNIRP 2020 guidelines fail to meet fundamental scientific quality requirements as to being built on a broad, solid, and established knowledge base, uphold a view contrary to well established knowledge within the field, and therefore cannot offer a basis for good governance when setting RF exposure limits for the protection of human health." <https://pubmed.ncbi.nlm.nih.gov/35751553/>

ICBE-EMF group called for a moratorium on 5G. A peer-reviewed paper on October 18, 2022, presented a scientific case for revision of the ICNIRP limits. The International Commission on the Biological Effects of Electromagnetic Fields (ICBE-EMF) challenged the safety of current wireless exposure limits to radiofrequency radiation (RFR) and is calling for an independent evaluation. This paper warns about the risks of exposure to radiation from 5G technology and claims that existing exposure limits for wireless radiation are inadequate, outdated, and harmful to human health and wildlife. The ICBE-EMF group reports that exposure limits for RF radiation set by ICNIRP and the FCC are based on invalid assumptions and outdated science. <https://ehjournal.biomedcentral.com/articles/10.1186/s12940-022-00900-9>

Do you consider it sensible, and more importantly, safe, to allow the public and children and those with metal implants to be exposed 25/7 long term to this form of radiation?

We invoke our right under the Freedom of Information Act and request the following details:

1. What guidelines and scientific evidence does the UK Health Security Agency (UKHSA) rely on when establishing safety standards for RF/EMF wireless technology, phone masts, antennas, including 5G installations? Please provide details on the criteria and sources used to determine these standards.
2. What procedures are in place to monitor and ensure compliance with the established radiation exposure limits for RF/EMF wireless technology, phone masts, antennas, including 5G installations?
3. How frequently are these measurements taken, and what actions are implemented if exposure levels exceed the recommended thresholds?
4. Has the UKHSA conducted or commissioned any recent studies specifically addressing the health impacts of RF/EMF wireless technology, phone masts, antennas, including 5G installations. If so, we request copies of any risk assessments or research findings that detail the potential health risks, particularly concerning vulnerable populations.
5. Are there specific technical requirements or restrictions imposed on RF/EMF technology, phone masts, antennas, including 5G installations to mitigate its impact on public health? This could include limitations on power levels, antenna placement, or minimum allowable distances for installing phone masts and antenna near sensitive areas, such as nurseries, schools, hospitals, and residential properties.
6. When and by whom were the radiation control measurements conducted for the phone mast near Millstead Primary School, Everton, Liverpool? Please provide the inspection reports to confirm this.
7. Who is the owner of the phone mast and the land near Millstead Primary School?
8. Who gave permission for the installation of these phone masts?

Considering that in your letter dated August 30, you claim that the operation of phone masts including 5G is working within safe levels and scientifically proven, it should not be a problem for you to issue us a guarantee letter that ensures the safety of RF/EMF technology, phone masts, antennas, including 5G installations and confirm that the UK Health Security Agency is the legal and financial guarantor of this. All questions, including the request for your full name and position, must be fully addressed within 20 working days as required by law.

Without prejudice,

Eileen O'Connor
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