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**Sent via Email From:**

Eileen O'Connor – Director, EM Radiation Research Trust

**The Chief Executive**

Colchester City Council  
Colchester Town Hall  
High Street  
Colchester

**16th March 2026**

**To:**

Pamela Donnelly – Chief Executive, Colchester City Council  
Councillor David King – Leader of the Council, Colchester City Council

**Cc – Cabinet Members, Other Councillors, and Colleagues:**

Councillor Mark Cory – Deputy Leader and Resources  
Councillor Andrea Luxford Vaughan – Portfolio Holder for Planning, Environment and Sustainability  
Councillor Martin Goss – Portfolio Holder for Neighbourhoods and Waste  
Councillor Paul Smith – Portfolio Holder for Housing  
Councillor Alison Jay – Portfolio Holder for Economy, Transformation and Performance  
Councillor Julie Young – Labour Group Leader & Cabinet Member for Housing  
Councillor Mike Lilley – Mayor of Colchester  
Democratic Services – Colchester City Council  
Brian Stein CBE – Chairman, EM Radiation Research Trust

*Dear Chief Executive Donnelly, Councillor King, and Members of Colchester Council,*

We write on behalf of the EM Radiation Research Trust (RRT), a UK-registered charity since 2003 (No. 1106304), dedicated to investigating and raising awareness of potential health and environmental effects from electromagnetic fields and promoting evidence-based precautionary public health policies.

This is an **open letter**, which will be made publicly available on our website, and which we are also bringing to the attention of senior government officials, calling on members of the public to alert their councillors, MPs, and other decision-makers. We are compelled to take this action to protect the charity's reputation, given that Colchester Council has made a publicly funded report available online that misrepresents our work.

Firstly, we wish to thank the Colchester Council Watch campaign group for providing video footage highlighting key concerns around the commissioned report, particularly at around 13 minutes, which references the RRT: <https://youtu.be/rk8RwH1v5LI>.

Upon reviewing the report *5G Environmental Consulting for Colchester City Council* (July 2025), prepared by **Intelligens Consulting**, we are deeply concerned that it mischaracterises our charity and its evidence-based work, which could damage our reputation and mislead the public.

On page 19 of the report, the EM Radiation Research Trust is mentioned under the heading “Responding to Activist Campaigns and Misinformation.” The report states:

“Some activist groups, such as Action Against 5G and the EM Radiation Research Trust, have influenced local discourse in Colchester. These groups raise concerns about certificate errors, cancer claims, or a lack of ‘independent’ testing.”

This description incorrectly labels the RRT as an activist group spreading misinformation. In fact, the EM Radiation Research Trust is a registered UK charity that engages in evidence-based scientific advocacy, collaborates with independent scientists, organises international conferences, and promotes the precautionary principle. Classifying our charity in this manner misrepresents its legitimate public health work and risks misleading both the Council and the public regarding the credibility of our evidence-based advocacy.

### **Independence and Conflict of Interest**

The report was authored by **Intelligens Consulting**, a consultancy whose core business is advising telecom operators, investors, and public authorities on the deployment of 5G, fibre networks, IoT, and smart-city technologies. The report is led by **Iqbal Singh Bedi**, whose professional career has focused entirely on promoting and facilitating telecommunications infrastructure (<https://www.scotlandis.com/blog/intelligens-consulting-3-years-old/>).

Intelligens Consulting is not a public health or environmental research authority, yet the report presents itself as “independent.” A consultancy whose professional purpose is to facilitate telecom infrastructure deployment cannot credibly be considered impartial when assessing potential health risks from that infrastructure. This raises serious concerns regarding objectivity and conflicts of interest.

### **Certificates, Company Identities, and Statutory Disclosure**

We note that the report dismisses objections regarding ICNIRP declarations, claiming that clerical errors or incorrect company names “do not automatically invalidate” the submission. While ICNIRP itself does not issue certificates, any document submitted as part of a planning application is subject to UK company law. Under the Companies Act 2006, Chapter 46, companies must clearly identify their registered name, company registration number (CRN), and registered office on all official correspondence and business documentation, including certificates submitted in planning applications (Sections 27, 55, and 60). Furthermore, the Company, Limited Liability Partnership and Business (Names and Trading Disclosures) Regulations 2015 (SI 2015/17) reinforce these obligations, requiring such identifiers to appear on all letters, notices, order forms, invoices, and websites.

Certificates relying on trading names or brand names, rather than the legal registered entity, omit statutory identifiers and create uncertainty as to which company is legally responsible for the declaration. Use of informal names, abbreviations, or misnamed entities undermines the credibility of the declaration and is not a trivial clerical error but a material legal issue. Proper identification, including the CRN and registered office, is essential to ensure accountability and traceability in regulatory compliance.

While Ofcom may describe these declarations as “self-certifications,” and councils may not routinely verify the content, this does not absolve operators or local authorities of statutory obligations to safeguard public health. Given these gaps, we request that the Council clarify who will be held legally responsible for regulatory oversight — the operators submitting incorrectly named or incomplete documentation, or the planning officers and councillors who approved installations based on those submissions. Reliance on self-certifications with incomplete or informal company information leaves residents vulnerable and raises critical questions about accountability and public safety.

### **Legal and Planning Responsibilities**

Local authorities have statutory duties to safeguard residents, particularly vulnerable populations, under domestic planning law and the Health and Social Care Act 2012 ([Section 2B](#)). ICNIRP guidelines are advisory, not statutory, and do not prevent councils from considering evidence of potential harm. Councillors retain discretion to assess health risks under the Town and Country Planning Act 1990 ([Section 70\(2\)](#)) and the National Planning Policy Framework (2021, paragraph 92). Authorities are also bound by the precautionary principle and obligations under the European Electronic Communications Code, which require health and safety considerations when authorising telecoms infrastructure.

Compliance with ICNIRP alone is insufficient. ICNIRP’s own science shows nerve and neurobehavioral effects at exposures far below the limits often described as “safe.” Councils cannot ignore this evidence, particularly regarding children, pregnant women, older adults, people with medical implants, and electrosensitive individuals.

### **Misleading Claims of Safety: Real-World Exposure Risks to Children and Adults**

The report’s claim that “the scientific consensus remains clear: there is no credible evidence that 5G, when used within ICNIRP limits, causes harm to human health” is misleading. Children and adults are exposed daily to wireless radiation at levels that can affect nerve and brain function. Even ICNIRP’s own guidelines ([ICNIRP 2010 PDF](#)) show that nerve stimulation occurs at just 2 volts per metre, with neurobehavioral effects occurring at even lower exposures. Yet government bodies and health authorities continue to claim that these so-called “safe” levels protect the public. This is demonstrably untrue, as everyday exposures from mobile phone masts, Wi-Fi, and other wireless devices frequently exceed these thresholds. Children are particularly at risk because their tissues absorb significantly more radiation than adults [<https://radiationresearch.org/cchildren-absorb-up-to-10x-more-wireless-radiation-in-the-bone-marrow-of-the-skull-compared-to-adults/>].

### **The True Cost of Wireless Technology Deployment**

The report we are rebutting highlights the financial opportunities of these technologies, placing pound signs before the council and emphasising the supposed benefits. It completely

fails to consider the devastating consequences for public health, wildlife, and future generations. Is it worth the cost of cancer, infertility, electromagnetic hypersensitivity, putting those with medical implants at risk, and harming the planet as a whole? Some costs cannot be measured in money. If we are right and the Intelligens Consulting report is wrong, the consequences are unimaginable and catastrophic. If we are wrong, the worst outcome is a short delay in financial gain. We are confident in our position, supported by decades of research and victim reports, and we urgently call on the council to listen.

Furthermore, the report's attempt to dismiss the 2011 WHO/IARC Group 2B classification of radiofrequency radiation, labelled as "**possibly carcinogenic to humans,**" by comparing it to pickles or coffee is both scientifically and ethically untenable. Unlike dietary choices, exposure to RF EMR from 2G, 3G, 4G, 5G, and Wi-Fi etc., is continuous and non-consensual, affecting entire communities, including children and other vulnerable populations. No one would agree to feed a baby or child nothing but pickles or coffee 24 hours a day, and likewise, trivialising potential carcinogens in this way is misleading and dangerous.

The Intelligens Consulting report does not explicitly address independent studies demonstrating RF health risks. In particular, it omits mention of the US National Toxicology Program (NTP) and the Italian Ramazzini Institute studies, two of the most prestigious toxicology research institutes in the world. The NTP's \$30 million animal bioassay, widely regarded as a gold-standard study and reviewed by an external panel of independent experts, found **clear evidence of carcinogenic activity** from RF exposure emitted by mobile phones. Similarly, the Ramazzini Institute's ten-year far-field study, examining RF exposure from base stations and environmental sources, also found clear **evidence of cancer in animals**, confirming the NTP findings in a different exposure context. Despite this, the report treats these high-quality independent studies as background "activist concerns," thereby misrepresenting the scientific landscape and downplaying critical evidence relevant to public health. By contrast, the Intelligens report relies solely on ICNIRP and other official bodies' assurances of safety, even though ICNIRP is widely criticised for protecting only against short-term heating effects and ignoring documented non-thermal biological effects and long-term risks.

2026 peer-reviewed analysis published in Environmental Health by independent experts applying standard toxicological assessment to decades of research, including the US National Toxicology Program and Ramazzini Institute animal cancer studies, concludes that **current RF exposure limits do not adequately protect against cancer or reproductive harm**. This reinforces that the findings from these two of the most prestigious institutes are consistent and robust, highlighting the urgent need for updated safety standards. Overlooking this evidence presents a distorted picture of the scientific record and risks downplaying the real-world consequences of RF exposure.

Many leading scientists, including Professor Lennart Hardell, have called for IARC's classification to be upgraded to **Group 1 – Known Human Carcinogen, citing mounting evidence from both experimental and epidemiological studies**.

### **Independent Studies and Real-World Evidence**

Scientific evidence continues to show that low-level RF exposure can produce real health effects. A 2022 peer-reviewed paper by Balmori examined 38 studies on people living near

mobile phone base stations, finding that a significant majority reported radiofrequency-related health effects. Approximately 74 percent of studies reported symptoms such as headaches and sleep disturbances, 77 percent reported cancer outcomes, and 75 percent reported biochemical changes. These findings indicate that long-term exposure, even at levels below ICNIRP limits, may have measurable biological and health effects, directly challenging claims that such exposures are entirely benign.

Research by Hardell and Nilsson (2024) documented seven Swedish case reports of adults and children developing insomnia, headaches, fatigue, cognitive difficulties, and other health issues shortly after 5G base stations were activated near their homes. Symptoms declined or disappeared when individuals moved to environments without 5G exposure, suggesting a causal link between environmental RF exposure and adverse health responses.

Recent advances in understanding the biological processes by which RF EMR exposure can lead to Electromagnetic Hypersensitivity (EHS) are described in Henshaw and Philips (2025). Their work, published in a peer-reviewed journal, demonstrates mechanistic plausibility for EHS, validating the experiences of affected individuals [<https://www.tandfonline.com/doi/full/10.1080/09553002.2024.2435329>].

These peer-reviewed reports and the work of other esteemed independent scientists promoted by the RRT are not misinformation, fake news, or conspiracy theories. Classifying them as such misrepresents the charity's legitimate work and misleads both the Council and the public regarding the health risks of electromagnetic fields.

## **Real-World Impacts and Legal Consequences**

Mechanistic research shows that electromagnetic fields can induce electric currents in peripheral nerves, producing nerve firing, pain, tingling, and neurobehavioral effects even at exposures below ICNIRP guidelines. These effects are not hypothetical: real-world cases demonstrate the tangible consequences of low-level RF exposure. For example, Velma Lyrae experienced severe electrical hypersensitivity affecting daily life, leading to a legal challenge against Somerset West and Taunton Council. Other cases include a person with medical implants who faced adverse health effects and initiated a claim against Cheltenham Borough Council, a UK child diagnosed with Electromagnetic Hypersensitivity (EHS) who required an Education Health Care Plan (PHIRE Medical News, August 2022), and a woman awarded early ill-health retirement and Employment Support Allowance due to EHS. These examples illustrate the profound human and legal impacts of electromagnetic exposure and underscore the urgent need for precautionary measures.

- Velma v Somerset West and Taunton Council ([Local Government Lawyer](#))
- Thomas v Cheltenham Borough Council ([Casemine](#))
- Education Health Care Plan awarded August 2022 – A UK child diagnosed with Electromagnetic Hypersensitivity [PHIRE Medical News](#)
- Early ill-health retirement and Employment Support Allowance – Awarded due to Electromagnetic Hypersensitivity [PHIRE Medical News](#)

## **Conclusion and Request**

Publicly funded reports should be accurate, balanced, and respectful of legitimate scientific advocacy. The Intelligens Consulting report misrepresents the EM Radiation Research Trust

as an “activist group,” despite the charity’s long-standing evidence-based work. We respectfully request that Colchester City Council:

1. Review the language used in the report concerning organisations raising public health concerns.
2. Issue a formal clarification stating that the EM Radiation Research Trust is a registered UK charity engaged in evidence-based scientific and public health advocacy.
3. Ensure that any future public-facing materials accurately reflect the charity’s status, work, and reliance on peer-reviewed evidence.

We also wish to make clear that we **stand by the specific issues highlighted in the Intelligens Consulting report**: there are indeed certificate errors, cancer claims, and a lack of independent testing. These concerns are real, documented, and must be taken seriously in any public health assessment.

As a publicly funded authority, the Council is expected to uphold the **Nolan Principles of Public Life**, including objectivity, openness, and accountability. It must also meet its responsibilities under the **Equality Act 2010 Public Sector Equality Duty** to consider the impacts of decisions on vulnerable groups, including individuals with medical implants and those experiencing electromagnetic hypersensitivity. Publicly funded reports must therefore present scientific evidence accurately and fairly, particularly where public health concerns are involved. We trust the Council will reflect carefully on these responsibilities and take appropriate steps to correct the record and ensure that public information provided to residents is balanced, accurate, and accountable.

We call on the Council to treat this matter seriously and we look forward to your formal apology and response.

Yours sincerely,

Eileen O’Connor  
Director  
EM Radiation Research Trust

Mr. Brian Stein CBE  
Chairman  
EM Radiation Research Trust

Address:  
Radiation Research Trust  
Chetwode House  
Leicester Road  
Melton Mowbray  
Leicestershire  
LE13 1GA  
UK

Website: [www.radiationresearch.org](http://www.radiationresearch.org)  
Registered UK charity since 2003 (No. 1106304)

## Appendix 1 – Evidence of Misrepresentation in the Intelligens Consulting Report

- **Report title:** 5G Environmental Consulting – Intelligens Consulting for Colchester City Council **Prepared for:** Colchester City Council
- **Prepared by:** Intelligens Consulting
- **Date:** July 2025
- **PDF Link:** <https://cbccrmdata.blob.core.windows.net/noteattachment/CBC-null-5G-environmental-consulting-Intelligens%20Consulting%20for%20Colchester%20City%20Council%20-%20Issue%202.pdf>

### Quote from page 19:

*“Some activist groups, such as Action Against 5G and the EM Radiation Research Trust, have influenced local discourse in Colchester. These groups raise concerns about certificate errors, cancer claims, or a lack of ‘independent’ testing.”*

### References:

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- **Companies Act 2006**, Chapter 46 – UK legislation governing company disclosure obligations, registered names, and public inspection. Sections 27, 55, 60.  
<https://www.legislation.gov.uk/ukpga/2006/46/contents>
- **The Company, Limited Liability Partnership and Business (Names and Trading Disclosures) Regulations 2015 (SI 2015/17)**  
<https://www.legislation.gov.uk/ukxi/2015/17/contents/made>
- **Company Warehouse.** Trading As / Business Names Guidance.  
<https://www.thecompanywarehouse.co.uk/blog/trading-as-company-and-business-names>
- **5G Appeal.** International Appeal to Stop 5G.  
<https://www.5gappeal.eu/the-5g-appeal/>
- **SaferEMR.** Research and policy resources on wireless radiation.  
<https://www.saferemr.com/2022/09/>
- **Environmental Health Trust.** ICNIRP critique: Conflicts of interest, corporate capture and the push for 5G.  
<https://ehtrust.org/the-international-commission-on-non-ionizing-radiation-protection-conflicts-of-interest-corporate-capture-and-the-push-for-5g/>
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- **Balmori A.** 2022. *Health effects of exposure to RF electromagnetic fields from mobile phone base stations: A review of the literature.* Environmental Research, 214, 114005. <https://pubmed.ncbi.nlm.nih.gov/35843283/>
- **Hardell L., Nilsson M.** 2024. *Summary of seven Swedish case reports on the microwave syndrome associated with 5G RF radiation.* Reviews on Environmental Health, 40(1), 147–157. <https://www.degruyter.com/document/doi/10.1515/reveh-2024-0017/html>
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- **Reilly J.P.** 2005. *Low-level electromagnetic field exposure limits for sensitive individuals.* Health Physics, 89(1), 71–77. <https://pfeifer.phas.ubc.ca/refbase/files/Reilly-Healthphysics-2005-89-71.pdf>
- **Velma Lyrae case.** Wireless radiation homelessness case against Somerset Council. <https://radiationresearch.org/wireless-radiation-hits-home-court-orders-council-to-reopen-velmas-claim/>
- **Children’s tissue absorption.** Children absorb significantly higher RF radiation in bone marrow of the skull compared to adults. <https://radiationresearch.org/cchildren-absorb-up-to-10x-more-wireless-radiation-in-the-bone-marrow-of-the-skull-compared-to-adults/>
- **Equality Act 2010, Section 149 – Public Sector Equality Duty.** UK Parliament. <https://www.legislation.gov.uk/ukpga/2010/15/section/149>
- **Committee on Standards in Public Life. 1995. The Seven Principles of Public Life (Nolan Principles).** UK Government. <https://www.gov.uk/government/publications/the-7-principles-of-public-life>