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17th April 2026

Sent via email from:

Eileen O'Connor
Director, EM Radiation Research Trust

Sent to:

Mr Weavers, Colchester Borough Council

Copied to:

Cllr Mark Cory
Cllr Andrea Luxford Vaughan
Cllr Martin Goss
Cllr Paul Smith
Cllr Alison Jay
Cllr Julie Young
Cllr Michael Lilley
Cllr David King
Democratic Services, Colchester Borough Council
Julie Hunt
Pamela Donnelly
Brian Stein CBE EM Radiation Research Trust Chairman

Dear Mr Weavers,

I am writing in response to your previous correspondence and the revised Intelligens Consulting report.

Having reviewed the response in full, the EM Radiation Research Trust (RRT) considers that the substantive concerns raised have not been addressed. While amendments have been made to tone and terminology, the underlying evidential and methodological issues remain unresolved.

It is not sufficient to assert that a report is independent, evidence based, and aligned with regulatory frameworks without addressing the limitations, assumptions, and scope of those frameworks. Nor does revision of language regarding stakeholder description resolve the mischaracterisation of a UK registered charity engaged in legitimate public health advocacy.

We also note continued reliance on ICNIRP, UKHSA, and Ofcom as primary sources of assurance. While these bodies are formally recognised within UK regulatory practice, their outputs do not constitute a comprehensive or independent assessment of the full range of peer

reviewed scientific evidence relevant to long-term exposure to radiofrequency electromagnetic fields.

ICNIRP exposure guidelines are based primarily on a thermal only model of harm focused on acute heating effects from short-term exposure. This approach does not incorporate the wider body of peer reviewed literature reporting non-thermal biological effects under chronic exposure conditions.

ICNIRP operates within a defined methodological framework, and its conclusions reflect the scope and assumptions of that framework. The RRT therefore requests clarification of the specific evidence base and assessment methodology used to determine that ICNIRP based exposure limits adequately account for both short and long term non-thermal biological effects reported in the scientific literature, including how such studies were evaluated, weighted, or excluded within the guideline development process.

UKHSA does not conduct original experimental research into radiofrequency bioeffects, and its assessments are based on reviews of existing literature interpreted through ICNIRP aligned assumptions. This raises a fundamental question as to whether any independent health risk assessment outside this framework was considered in the preparation of the report.

Ofcom is a spectrum management regulator and does not have a statutory role in determining biological health risk. Regulatory compliance with ICNIRP based limits therefore cannot be presented as equivalent to an independent assessment of biological safety.

With respect to commissioned consultancy, the assertion of independence based solely on the absence of direct commercial interest in equipment supply does not address broader structural dependencies within the telecommunications advisory ecosystem. Clarification is therefore requested as to the criteria used to determine independence in this context, including how sector-based alignment of interest was assessed.

The RRT also notes that framing organisations raising legitimate public health concerns in terms associated with “disruptive discourse,” or similar categorisation, remains a serious concern, particularly where the organisation in question is a UK registered charity engaged in peer reviewed scientific engagement, public communication, and policy advocacy.

Public bodies have a responsibility to ensure that commissioned reports maintain accurate and neutral descriptions of stakeholders and do not inadvertently delegitimise lawful participation in scientific and policy debate.

Request for clarification

In light of the above, the RRT requests a clear and evidenced response to the following points:

1. The evidence base and methodology used to determine that ICNIRP based exposure limits account for both short and long term non-thermal biological effects reported in the peer reviewed scientific literature, including how such studies were evaluated, weighted, or excluded within the guideline development process.
2. Whether any independent health risk assessment was undertaken outside ICNIRP aligned frameworks, and how alternative scientific interpretations were considered.
3. The criteria used to determine independence of commissioned consultants, including how potential structural or sector-based dependencies were assessed.

4. Whether evidence relating to vulnerable groups, including children, individuals with medical implants, and people with pre-existing health conditions, was explicitly considered in the evidential basis relied upon for the report and associated regulatory assurances.

The RRT reiterates that public health policy requires transparent engagement with the full range of peer reviewed scientific literature, and that legitimate scientific and policy scrutiny should not be framed in terms that risk delegitimising lawful public interest activity.

This correspondence will be published as part of the public record for transparency.

The RRT now considers this matter formally unresolved and requests a substantive evidential response within ten working days.

Yours sincerely,
Eileen O'Connor
Director
EM Radiation Research Trust

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