

Summary of ICNIRP Objections:

RFR = Radio Frequency Radiation

EMF = ElectroMagnetic Fields or frequencies

ICNIRP = International Commission on Non-Ionizing Radiation Protection

<https://www.icnirp.org>

all words within double quote marks are direct quotes

NPPF = National Planning Policy Framework (ie guidance)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

ICNIRP Guideline 2020

1. Many have commented negatively on the **Conflicts of Interest** of most of the committee, including a Council of Europe paper.
2. It is a "guideline" only and has no force of international regulation. Several countries build their 'standards' on significantly lower levels.
3. It is for the "protection of **humans**" only.
Stated to include any "foetus".
no mention of animals, plants, insects etc it is simply silent.
4. It recognises there are "**limitations**" to their knowledge.
5. It gets its data and information from reviews of literature. There is no analysis of the reviews given.
6. It refers to a "safe" level three times but only in a general sense. There is no claim that the levels in the Guideline are themselves 'safe'
7. It recognises there are "**substantiated adverse health effects**" of RFR/EMF in the non-ionising ranges.
8. For which it discusses three mechanisms of action:
"nerve stimulation"
"permeability of membranes"
"temperature rise"
9. It uses the term "**unlikely**" when considering how adverse health effects may happen. "Unlikely" is not a scientific expression yet it is used 7 times in the document.
10. It acknowledges that "EMFs, ... **can affect the body** ... directly (via direct interaction between field and tissue)" and thus **excludes medical procedures.**
11. It acknowledges that "EMFs can **indirectly cause harm** by unintentionally interfering with active implantable medical devices" as well as passive implants, thus excluding them from consideration in the guidance. Probably 90%+ of the population has small amounts of metal in their body from past or present dental fillings and many others will have dental braces, cochlear implants, shunts in various places, 'mesh' to support (eg) a hernia or vaginal issue, metal in post accident operations - the list goes on
12. It acknowledges that "EMFs may also **interfere with electrical equipment** more generally ..., which can affect health indirectly by causing equipment to

malfunction." Of course this will not be confined to medical equipment.

Self-Certification and use in Planning

1. ICNIRP does **NOT** issue certificates.
2. The UK is unique in using a "**self**-certificate" of compliance.
3. It is merely **evidence** and should be treated as such by planners.
4. Reliability (of anything) depends on the source. (In this case the applicant itself.)
5. Certificates state the equipment is "**designed**" to be compliant. There is no **proof** given of actual compliance. Very occasionally some figures are included accidentally* but without explanation or calculation.
6. The "equipment" is never fully listed nor is individual item specification provided. it should include at least frequencies to be used and the capability of the equipment the range of signals (especially the collimated beam signals) and any drop-off of power
7. NPPF writes "**evidence** to demonstrate that electronic communications infrastructure is **not expected to cause significant and irremediable interference** with other electrical equipment". (see 12 above)

* Since the pages after page 1 contain a statement that it **must not** (in bold and red) be included as part of the form.

It could be added that if a LPA, by function as the competent authority, approves a mast relying on the self-certification of the applicant, then that LPA will hold any liability should there be in the future any claim for personal injury. This is based on the arguments that:

1. it is uninsurable for harm to health (ref Wera Hobhouse MP to Minister of State).
2. DLA Piper advice to PHE (now UKHSA) is that no such liability can accrue to the guidance nor to the ICNIRP.
3. Under the EECC they have made no attempt to ensure that all the equipment is, in actuality, compliant including,
 1. the near field radiation in power and timing,
 2. with regard to 5G collimated beams, the power intensity and drop-off over distance as well as the side-lobes.
4. If they receive such information and can confirm its accuracy and it is available for public scrutiny, if it exceeds ICNIRP parameters, then it **MUST** be refused.
5. If it is proven compliant then other considerations must be taken into account.