

## Your response

Question	Your response
<p><b>Question 1: Please provide feedback on the additions, amendments and clarifications we have made to the wording of the licence condition to implement our decisions on the scope of the licence condition in our October 2020 Statement, giving reasons for your response.</b></p>	
<p><b>Question 2: Please provide feedback on the additions and clarifications to our 'Guidance on EMF Compliance and Enforcement', giving reasons for your response.</b></p>	<p>I am extremely concerned at the addition of a new licence condition giving a licensee exemption from complying with the ICNIRP general public safety limits, stating “... If compliance with the relevant levels in the ICNIRP Guidelines for protection of the general public is likely to result in or create an immediate and serious threat to the safety of the public or public health.”</p> <p>This is a ‘public’ consultation and the overwhelming response you had to the initial consultation demonstrated the lack of trust in ICNIRP as an organisation with long standing ties to the industry that benefits from their dismissal of health risks from electromagnetic fields.</p> <p>Dr Andrew Goldsworthy (Lecturer and retired Biological Safety Officer from Imperial College, London), states that “... The ICNIRP Guidelines, which are based on the assumption that cells and tissues are uniformly conductive, are approximately one thousand times too high.”</p> <p>In what possible situation can it be considered in the interests of public safety to exceed the grossly inadequate safety guidelines set by ICNIRP?</p> <p>ICNIRP’s guidance levels give no consideration of:</p> <ul style="list-style-type: none"> <li>- Wavelength/frequency</li> <li>- Near field/far field</li> </ul>

- Overall duration of exposure (continuous, interrupted), acute and chronic exposures
- Polarization (linear, circular)
- Continuous wave and pulsed fields
- Modulation
- Static magnetic field at the place of exposure
- Electromagnetic stray field

Reference:

[http://multimedia.biol.uoa.gr/2008/Seminaria\\_Diplomatikes%20k.a/Synedrio\\_Thess/Global%20new/Belyaev.htm](http://multimedia.biol.uoa.gr/2008/Seminaria_Diplomatikes%20k.a/Synedrio_Thess/Global%20new/Belyaev.htm)

**Comment:** This presentation explains the technical limitation of ICNIRP guidelines. The diashow requires the IE browser

As an 'independent' regulator, I would have hoped that you would have taken on board the overwhelming evidence you were supplied with at your initial public consultation and would be considering the suggestions to take advice from medical experts and EMF scientists:

<https://www.emfscientist.org/index.php/emf-scientist-appeal>

**Question 3: Please provide feedback on the trial version of our EMF calculator, giving reasons for your response.**