

**7 PILLARS OF WISDOM - APRIL 2005**

**FOR ACTION PLAN BASED ON REPORT BY THE BOARD OF NRPB**

**ISSUED 11<sup>TH</sup> JANUARY 2005**

**“MOBILE PHONES AND HEALTH 2004”**

Having welcomed Sir William Stewart's Report issued on 11<sup>th</sup> January 2005 endorsing the continued adoption of “The Precautionary Approach” (S 19 Executive Summary) to the use of mobile phone technologies – the definition of “Precautionary Approach” to equate to the “Precautionary Principle” as defined (In Terms of Risk, NRPB 15, 4; 2004 **must** be considered here on these terms) - the EM Radiation Research Trust supported by TETRAWATCH sets out the following SEVEN steps as an Action Plan to advance the implementation of that basic principle of the Report:-

**SS 69**

**1. Mobile Phones and Children**

While we welcomed the specific information on the MMF Website ([www.mmfai.org/public](http://www.mmfai.org/public)) on SAR values for mobile phones, we do not consider the precautionary approach is adopted by the retailers at the point of sale of the phones. Warnings on children's usage are totally inadequate as voiced publicly by Sir William Stewart on 6<sup>th</sup> September 2004. We also believe that there should be exploration of the characteristics of DECT phones and their potential effects on health including an examination of multiple installations, or base station siting, and recommended duration of use.

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**SS 76/86**      **2. Planning and Mast/Cell Emission Strengths**

While the excellent All Party Mobile Group Report (APMG 4) followed the Stewart Report in recommending that permitted development rights be revoked for all new base station applications (as practised in Scotland) – and for the Government Mr Desmond Browne in the debate on 1<sup>st</sup> March 2005 (Hansard 236 LOH Para 2) advised the House of Commons that the ODPM will consider a revised planning process, the current widespread health concerns of the public on the siting on base stations and smaller transmissions cells, particularly close to sensitive sites such as schools, hospitals, etc., call for greater clarity and openness on the strengths and directions and effects of the electro-magnetic emissions from such stations and cells. We consider the current unilateral certification by each operator that a mast complies with the ICNRIP guidelines is unspecific and inadequate and contributes greatly to the current public unease and uncertainty. There should be disclosure on all the planning applications for new masts of the strengths of cells and sites and the definition of ‘new mast site’ will include any additions to current sites, i.e., where there are multiple masts. We call for a review of the techniques for measuring each technology for both mobile phones and emergency services. We consider there should be a prohibition on averaging emissions across frequencies, sources and time.

**SS 56/596**      **3. Register of Locations, Sites, Cells, Strengths**

While we seek that all new planning applications for masts have full disclosure of emission strengths, directions, etc., we consider the same degree of public disclosure should apply to ALL base stations with the setting up of a Public Register of Masts, Siting Cells and their Emissions, with Directions to be kept by OFCOM, who will be accountable for the integrity of the data. The information should be

available, additionally, on the Sitefinder website. Within 6 months the onus would be on each operator, including emergency services communications providers, to supply sufficient data to compile the register.

With just over 40,000 masts between six operators the task could be resourced from the companies' positive cash flows, with a Government contribution from hypothecated TAX/Licence revenues.

In cases where there is mast sharing, the host site owner featuring on Sitefinder would be responsible for collecting the data from sharing operators – including 3G Licences - and site compliance to emission guidelines.

Only with full disclosure of all current masts sites/outputs can the audit process be held to have any real validity.

**S 48** The current audit process through OFCOM is not sufficiently clear and merely audits a small 1% proportion of sites and is set against a less stringent standard than is adopted in many other countries. At the current rate of 75 masts per year, it will take 533 years to audit those existing masts, and only then by using ICNIRP as the yardstick.

**SS 127/132 4. Exclusion Zones - Safety Zones**

The Exclusion Zones referred to in the 2004 Report should include applying the Precautionary Principle not just to employees servicing masts or undergoing training within close proximity of masts. All sensitive sites, such as schools, hospitals and residential sites close by, should enjoy specific consideration from the Precautionary Principle provisions.

Further, prior to renewal of any Licence Agreement for the siting of any mast adjacent to such sensitive sites, a full Audit Report on the site, including advertising in the press of the application, should be obtained from the appropriate body. If evidence of such actions cannot be produced, Licence Agreement should be withheld. Such renewals should be treated as new applications. Should the renewal of the licence be refused the existing mast should be removed within 28 days.

**5. Planning Policy Guidance (PPG8)**

As advocated by the APMG Report (R7), health is a perceived consideration in the eyes of the public when a mast planning application is made – or a site character is altered with the addition of new masts/antennae. The current guidance is flawed and equivocal and requires redrafting and reissue within 3 months.

**6. Audit Process - New Regulatory Body**

Given the current slow progress of OFCOM on auditing sites, and the recommendation R18 of the APMG Report to establish a new body, we seek to widen the composition and remit of that body. It should be made up with representation from non-aligned scientists, the industry, local/central Government, environmental health and planning, but must also contain impartial and interested lay members of the public. It could act as a third party referee on handling planning issues relating to disputed sites – well removed from the prohibitive costs and sometimes ill informed courts.

The 'Ten Commitments' to best siting practice are totally lacking in sanctions against any operator default. In addition, it should be noted that the 10 Commitments have no immediate relevance to each planning application, being commitments to establish regimes which do not require replication nor repetition as accessories or enhancements to the individual planning applications. For this reason, a review of the 10 Commitments should be undertaken which relates them to each application with specific relevance and sanctionable action points. Power should be given to the regulating body by an amendment to the Telecommunications Act 1984 Schedule 2 to refer to the County/Sheriff Court cases where an operator has breached the terms of the grant. Additionally, the regulatory body could move for discontinuance of use and removal of the rogue masts and associated apparatus and equipment.

Similarly, where covert mast changes have been made (as highlighted in a recent BBC 3 Programme) the defaulter must be made to remove the offending mast. Serious financial penalties, additionally, must be imposed.

The New Body should also review other countries' practice in setting more stringent levels than are current in the UK, recognising the condition of and to assist the well-being of those with electro-magnetic hypersensitivity (believed to be 3 to 5% of the population).

**7.           Research**

**S 172 (b)**           i) We would welcome urgent research into the effects of TETRA. We question whether there has been proper evaluation of this system against its alternatives.

**S 172 (e)**           ii) We likewise would welcome further investigation into electro-magnetic hypersensitivity and its apparent effect on health and well-being, while the MTHR programme findings are being reported.  
**119/121**

The current reliance on ICNIRP is too exclusive and prevents examination of, and protection from, any effects and conditions other than those due to RF heating.

Finally, with the vast benefits accrued to The Treasury in taxation and licence fees of the technology, currently believed to be in excess of £40 billion, it is highly irresponsible of the Government to contribute only £4.4 million to limited research and not to fund a full and extensive research programme. The establishment of a proper, enforceable regulatory regime, for what could be a significant health hazard to future generations, is essential. It is equally irresponsible of the Mobile Phone Operators, whose contribution to research equals that of the Government, but who are in a position to make profit from their involvement, to avoid making a realistic contribution to research, commensurate with their income.