

**To:** Dr. Mona Nemer, Chief Science Advisor of Canada  
**Sent:** July 19, 2020  
**Subject:** Radiation Emitting Devices Act

Dear Dr. Nemer,

I am writing to you as Chief Science Advisor because Canadians need your help with issues regarding their health.

Health Canada, and specifically the Environmental and Radiation Health Sciences Directorate, is responsible for the sale, lease and importation of radiation emitting devices in Canada via the Radiation Emitting Devices Act.

Under the Prohibitions in the Act, no device can be imported or sold in Canada if that device fails to comply with established standards. <https://laws-lois.justice.gc.ca/eng/acts/R-1/page-1.html#h-420039>

In 2016, Dr. Marc Arazi announced to the world that in testing nearly 100 of the most popular cell phones sold in France, nearly 90% were found to have radiation emissions in excess of France's standard. France's SAR limit of 2 W/kg is higher than Canada's Safety Code 6, 1.6 W/kg. Since that time, France has banned the sale of and recalled several cell phones that were on Dr. Arazi's Phonegate list. <https://www.phonegatealert.org/wp-content/uploads/2018/06/Dossier-de-presse-liste-des-mod%C3%A9les-%C3%A0-risques-28-juin-2018.pdf>

Independent testing of several cell phones sold in North America was done by the Chicago Tribune <https://www.chicagotribune.com/investigations/ct-cell-phone-radiation-testing-methodology-20190821-whddrjlk6fbmxoqh25u5t7lkb4-story.html>. and results were consistent with those reported by Dr. Arazi. Dr. Om Gandhi reported that hundreds of cell phones in common use exceed US emission standards of 1.6 W/kg by as much as 11 times. <https://ieeexplore.ieee.org/stamp/stamp.jsp?tp=&arnumber=8688629>

Apparently these are the only cell phone emission tests done in either the US or Canada.

In May, 2020, France banned a “top-of-the-line” and popular gaming phone, the Razer Phone 2 after finding, under controlled testing, that its SAR was 3.29 W/kg when held 5 mm from the skin. The SAR, of course, increases dramatically when the distance is reduced, exceeding 10 W/kg when in direct contact with skin. <https://www.phonegatealert.org/en/press-release-withdrawal-of-the-razer-phone-2-not-seeing-the-forest-for-the-trees> When being used or carried, it is common for cell phones to be in touch with the body.

Many of the cell phones which have been found by agencies other than Health Canada to have exceeded the standards established by Safety Code 6, for example the Razer Phone 2, are still being used and sold in Canada. <https://www.telus.com/en/bc/mobility/phones/motorola-razr>

As Science Advisor I am sure you are aware of the thousands of studies and hundreds of scientists warning of the potential health risks associated with microwave radiation. With more cell phones being sold all the time, and especially with new ones using untested 5G technology being introduced into the marketplace, Health Canada must not be allowed to continue to ignore the evidence that even the controversial Safety Code 6 guidelines are being exceeded.

Health Canada has received hundreds of letters about this and similar issues, to no avail. Hopefully your mandate will allow you to engage on this topic.

I look forward to receiving your response at your earliest convenience.

Regards,  
Sharon Noble