

**From:** "Martin Proulx, IC" <[martin.proulx@canada.ca](mailto:martin.proulx@canada.ca)>  
**To:** "snoble19" <[SNOBLE19@SHAW.CA](mailto:SNOBLE19@SHAW.CA)>  
**Cc:** "Martin Proulx, IC" <[martin.proulx@canada.ca](mailto:martin.proulx@canada.ca)>  
**Sent:** Thursday, October 29, 2020 8:29:14 AM  
**Subject:** Response regarding compliance

Dear Ms. Noble:

Thank you for your email reply on October 5, 2020, where you provided clarifications towards your request relating to ISED's compliance program of radiocommunication equipment in Canada.

As previously mentioned, ISED does not release audit information publically in order to protect the robustness of our market surveillance program. Doing so would allow industry stakeholders to discern valuable information pertaining to our auditing strategies in terms of audit cycles and targeted equipment types.

While ISED cannot provide the detailed information you requested, we would like to share with you that we are actively studying approaches to improve our overall communications with the public on our equipment certification and market surveillance programs.

We would like to thank you once again for your interest in ISED's compliance monitoring program.

Kind regards,

**Martin Proulx**

**Director General, Engineering, Planning and Standards  
Branch**

SPECTRUM AND TELECOMMUNICATIONS SECTOR  
Innovation, Science and Economic Development / Government of  
Canada

[Martin.Proulx@canada.ca](mailto:Martin.Proulx@canada.ca) / Tel: 343-291-1500 / TTY:  
1-866-694-8389

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**From:** "snoble19" <[snoble19@shaw.ca](mailto:snoble19@shaw.ca)>  
**To:** "Martin Proulx, IC" <[martin.proulx@canada.ca](mailto:martin.proulx@canada.ca)>  
**Cc:** "simon kennedy" <[simon.kennedy@canada.ca](mailto:simon.kennedy@canada.ca)>  
**Sent:** Monday, October 26, 2020 10:26:08 AM

**Subject:** Second request: In response to concerns regarding cell phones

Dear Mr. Proulx,

Would you please advise when I can expect a response to my letter of Oct. 5?

For your information, the IEEE reports that independent tests confirm that another popular Apple cell phone, taken off the shelf, exceeds the FCC exposure guidelines by multiple times.

<https://spectrum.ieee.org/tech-talk/telecom/wireless/radio-frequency-exposure-test-iphone-11-pro-double-fcc-limits>

Has this phone been included in the "audit" done by ISED?

I look forward to receiving a response.

Regards,  
Sharon Noble

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**From:** "snoble19" <snoble19@shaw.ca>  
**To:** "Martin Proulx, IC" <martin.proulx@canada.ca>  
**Cc:** "simon kennedy" <simon.kennedy@canada.ca>  
**Sent:** Monday, October 5, 2020 1:00:12 PM  
**Subject:** Re: In response to concerns regarding cell phones

Dear Mr. Proulx,

Thank you for your response of Sept. 29.

In response to my request for audit records you stated:

· "Audit reports are not made publicly available as a means to ensure that equipment manufacturers as well as other industry stakeholders are not made aware of our auditing strategies and techniques in order to protect the robustness of ISED's market surveillance program."

I am not asking for auditing strategies or techniques, but rather the names of the manufactures and the models of the phones tested and the test results. In my initial email I referenced the tests done in the US by independent labs that reached the same conclusion

as Dr. Arazi: many cell phones currently being sold and in use are in violation of national and international emission standards. The testing methods used were precisely those used by the FCC, which are consistent if not identical to those required by ICNIRP. In total 23 cell phones that are still on the market and being used widely were tested and were found to exceed ICNIRP guidelines.

"The Tribune tested 11 cellphone models by measuring how much radiofrequency radiation was absorbed by a simulated body positioned near the phone. The Federal Communications Commission has set an exposure limit of 1.6 watts per kilogram averaged over one gram of tissue.

### **How the tests were performed**

Standard test: The phones were tested in accordance with FCC rules and guidelines. Exposure was measured at two distances from the simulated body: the distance the manufacturers chose for their own premarket testing (5, 10 or 15 millimeters) and a closer "pocket test" at 2 millimeters.

Modified test: The Apple and Motorola phones were retested after those companies provided feedback based on the results. These tests added steps intended to activate sensors designed to reduce the phones' power. Two newly acquired phones also underwent the modified tests."

The details are available at <https://www.chicagotribune.com/investigations/ct-cell-phone-radiation-testing-methodology--20190821-whddrjlk6fbmxoqh25u5t7lkb4-story.html> and <https://ieeexplore.ieee.org/stamp/stamp.jsp?tp=&arnumber=8688629>

According to Dr. Om Gandhi:

**"IV. INTERPRETATION OF THE ANFR TEST RESULTS OF TABLE 1 All 13 of the selected telephones of Table 1 fail the SAR requirements mandated by the ICNIRP/European Standard and the US FCC Standard because of the following considerations: 1) The ICNIRP guidelines state that the 10-g SAR for conditions of actual use be no more than 2 W/kg and FCC requires compliance with IEEE Standard C95.1-1991 [1] which is set in terms of 1 g SAR of 1.6 W/kg. It has been shown in peer-reviewed published literature [4], [6] that**

**because of the fairly shallow penetration of RF energy coupled to the tissues, the 1 g SAR is typically 2.5-3 times the 10-g SAR."**

To reiterate, Mr. Proulx, I am not asking for any information that might be considered confidential, although I would assume that ISED testing would follow the compliance procedures that are described in ISED's RSS-102, which are publicly available and readily available to cell phone companies.

I look forward to receiving a response with the audits results for the last 5 years providing the name of the cell phone manufacturer, the model and the test results at your earliest convenience.

Regards,  
Sharon Noble

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**From:** "Martin Proulx, IC" <martin.proulx@canada.ca>  
**To:** "snoble19" <SNOBLE19@SHAW.CA>  
**Cc:** "simon kennedy" <simon.kennedy@canada.ca>  
**Sent:** Tuesday, September 29, 2020 7:40:58 AM  
**Subject:** In response to concerns regarding cell phones

Dear Ms. Noble:

Thank you for your email reply dated August 21<sup>st</sup> where you presented a number of questions concerning ISED's compliance monitoring activities:

1. Would you please provide documentation regarding the methods by which such monitoring is done?
  - The compliance procedures are described in ISED's technical standard, [RSS-102 - Radio Frequency \(RF\) Exposure Compliance of Radiocommunication Apparatus \(All Frequency Bands\)](#) and are based on recognized international testing procedures that have been adopted by most countries around the world. These international standards are listed in section 3 of RSS-102. For further information regarding technical standards related to radiocommunication devices, please refer to our [Radio Equipment Standards](#) webpage.

2. Are wireless devices being tested taken from the shelf or are they provided by the manufacturer?
  - ISED performs compliance testing on both product samples obtained directly from the Canadian market as well as on product samples supplied by the manufacturer.
3. Has ISED tested off-the-shelf models of the cell phones that were found to have exceeded France's allowance?
  - Canadian and French requirements are not harmonized. As such, ISED's efforts are entirely focused on assessing if the products being sold on the Canadian market comply with all applicable domestic requirements.
4. May I request copies of the audit reports for cell phones tested over the last 5 years
  - Audit reports are not made publicly available as a means to ensure that equipment manufacturers as well as other industry stakeholders are not made aware of our auditing strategies and techniques in order to protect the robustness of ISED's market surveillance program.
5. Within the last 10 years has ISED found any wireless device to be in non-compliance, and, if so, what actions were taken?
  - A small number of devices have been found to be non-compliant within this timeframe. In all cases of non-compliance, ISED worked with the equipment manufacturer to bring the product back into full compliance following the receipt of confirmation from Health Canada that the levels measured were below the threshold for any adverse health effects to end-users.

Thank you for your interest in the compliance of radiocommunication equipment in Canada.

Kind regards,

**Martin Proulx**

**Director General, Engineering, Planning and Standards  
Branch**

SPECTRUM AND TELECOMMUNICATIONS SECTOR  
Innovation, Science and Economic Development / Government of  
Canada

[Martin.Proulx@canada.ca](mailto:Martin.Proulx@canada.ca) / Tel: 343-291-1500 / TTY:  
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**Directeur général, Direction générale du génie, de la  
planification et des normes**

SECTEUR DU SPECTRE ET DES TÉLÉCOMMUNICATIONS  
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1-866-694-8389

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**From:** "Certification Bureau, Bureau homologation (IC)"  
<ic.certificationbureau-bureauhomologation.ic@canada.ca>  
**To:** "snoble19" <snoble19@shaw.ca>, "simon kennedy"  
<simon.kennedy@canada.ca>  
**Sent:** Monday, August 24, 2020 5:43:41 AM  
**Subject:** RE: Cell phones exceeding SC 6 SAR

Good day Sharon,  
Your inquiry has been received and assigned to one of our  
officers.

**Regards,**

**Engineering, Planning and Standards Branch  
Innovation, Science and Economic Development Canada /  
Government of Canada  
Tel: 613-990-4218 / TTY: 1-866-694-8389 (06)**

**Direction générale du génie, de la planification et des normes  
Innovation, Sciences et Développement économique Canada /  
Gouvernement du Canada  
Tél: 613-990-4218 / ATS: 1-866-694-8389 (06)**

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**From:** Sharon Noble <snoble19@shaw.ca>  
**Sent:** August 21, 2020 3:33 PM  
**To:** Certification Bureau / Bureau homologation (IC) <ic.certificationbureau-bureauhomologation.ic@canada.ca>; Kennedy, Simon (IC) <simon.kennedy@canada.ca>  
**Subject:** Re: Cell phones exceeding SC 6 SAR

Dear Mr. Kennedy,

Thank you for your prompt response. At this time I do not wish to debate with you or ISED the adequacy of Safety Code 6 or the assertions that even children would suffer no health effects if exposed to cell phone radiation 24/7/365 since these issues are not within your mandate. Rather the purpose of my communication is to ask about ISED procedures for ongoing testing of cell phones that are being sold to and used by Canadians.

I am happy to hear that ISED audits and evaluates wireless devices sold in Canada. I would appreciate if you would provide the following information regarding testing procedures and results:

- Would you please provide documentation regarding the methods by which such monitoring is done?
- Are wireless devices being tested taken from the shelf or are they provided by the manufacturer?
- Has ISED tested off-the-shelf models of the cell phones that were found to have exceeded France's allowance?
- May I request copies of the audit reports for cell phones tested over the last 5 years?
- Within the last 10 years has ISED found any wireless device to be in non-compliance, and, if so, what actions were taken?

Thank you for your time, and I look forward to receiving your response.

Sincerely,  
Sharon Noble

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**From:** "Certification Bureau / Bureau homologation (IC)"  
<[ic.certificationbureau-bureauhomologation.ic@canada.ca](mailto:ic.certificationbureau-bureauhomologation.ic@canada.ca)>  
**To:** "snoble19" <[snoble19@shaw.ca](mailto:snoble19@shaw.ca)>  
**Sent:** Friday, August 21, 2020 11:26:38 AM  
**Subject:** RE: Cell phones exceeding SC 6 SAR

Dear Ms. Noble:

On behalf of Mr. Simon Kennedy, Deputy Minister of Innovation, Science and Economic Development Canada and Dr. Mona Nemer, Chief Science Officer, I am writing in response to your emails regarding cell phones and radio frequency (RF) exposure.

The Government of Canada is committed to protecting the health and safety of Canadians from environmental risks, including those posed by overexposure to RF energy. As such, Innovation, Science and Economic Development Canada (ISED)'s regulatory framework provides safeguards for Canadians. ISED has adopted Health Canada's Safety Code 6 as the Canadian radiofrequency (RF) exposure limits for wireless devices and their associated infrastructure. To protect the public, these limits are set far below the threshold (at least 50-fold safety margin) for all known established adverse health effects and provide protection for all age groups, including children, on a continuous basis (24 hours a day, seven days a week). This means that if anyone, including a small child, were exposed to RF energy from multiple sources within the Safety Code 6 limits for 24 hours a day, 365 days a year, there would be no adverse health effects.

In turn, Health Canada's scientific evidence indicates that the recommended SAR limit of 1.6 W/kg for cell phones is not the threshold for the occurrence of adverse health effects. As a precautionary measure, the SAR limit in Safety Code 6 was set to more than 50 times below the level at which excessive tissue heating could occur in the most sensitive tissue (the eye). This means that the SAR limits in Safety Code 6 would need to be exceeded by a factor of more than 50 before one would see any thermally related adverse health effects.

Furthermore, ISED requires that all manufacturers of wireless products, including cell phones, meet the regulatory requirements



set forth in its technical standards. ISED's technical standards are based on recognized international testing procedures that have been adopted by most countries around the world. When cell phones are tested for compliance, they are tested at full power for the duration of the test. In reality, cell phones operate at much lower power levels, to preserve battery life, maximize call time and avoid network interference. As such, under normal operating conditions, a cell phone yields much lower specific absorption rate (SAR) levels than levels measured during compliance testing performed in laboratory settings.

ISED also maintains a market surveillance program, which audits and evaluates a sampling of wireless devices currently on the Canadian market on an ongoing basis. The market surveillance program helps to ensure that wireless devices available to Canadians continue to meet the RF exposure requirements. If a wireless device is found to be in non-compliance, ISED will take immediate actions.

Additional information on Radiofrequency Energy and Safety can be found on our [website](#).

Please accept my best wishes.

Sincerely,

Certification and Engineering Bureau, Engineering, Planning and Standards Branch  
Innovation, Science and Economic Development Canada /  
Government of Canada (11)  
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Bureau d'homologation et services techniques, Direction générale du génie,  
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613-990-4218 / TTY: 1-866-694-8389

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**From:** Sharon Noble <[snoble19@shaw.ca](mailto:snoble19@shaw.ca)>  
**Sent:** August 19, 2020 1:16 PM  
**To:** Kennedy, Simon (IC) <[simon.kennedy@canada.ca](mailto:simon.kennedy@canada.ca)>  
**Subject:** Cell phones exceeding SC 6 SAR

Dear Mr. Kennedy,

The Department of Innovation, Science and Economic Development (ISED) is responsible for enforcing the Radiocommunications Act which ensures that radiation emitting devices such as cell phones sold and used in Canada fall within the guidelines established by Health Canada, Safety Code 6.

I therefore am directing to you, Mr. Kennedy, the concern regarding the current use and marketing of cell phones which emit levels of radiation many times higher than the SAR limit of 1.6 W/kg.

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.

As far as I've been able to determine, ISED has not done any testing of off-the-shelf devices as a result of the findings noted above. Many of the cell phones which have been found by agencies other than ISED to have exceeded the standards established by Safety Code 6, for example the Razer Phone 2, are still being used and sold in Canada. Can you please explain why the Radiocommunications Act has not been enforced by ISED with regard to these devices?

Thank you for your time. I look forward to receiving your response at your earliest convenience.

Regards,  
Sharon Noble  
Victoria, BC

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**From:** "snoble19" <snoble19@shaw.ca>  
**To:** "brian ahier" <brian.ahier@canada.ca>, "hc rpb-brp sc" <hc.rpb-brp.sc@canada.ca>  
**Cc:** "Office of the Chief Public Health Officer of Canada, Bureau de l'administratrice en chef de la santé publique (PHAC/ASPC)" <nfa1575541451400130@canada.ca>  
**Sent:** Sunday, August 2, 2020 1:56:10 PM  
**Subject:** Radiation Emitting Devices Act

Dear Mr. Ahier,

Thank you for your response of July 29. I did not write about and neither do I wish to discuss Health Canada's Safety Code 6 at this time. The purpose of my letter is the fact that nothing is being done about the sale and use of cell phones that violate Safety Code 6 guidelines. I would ask that you address this significant issue.

As stated in your Mission Statement, Health Canada is the federal department responsible for helping the people of Canada **maintain**

**and improve their health....** with the objectives of **preventing and reducing risks to individual health** and the overall environment, and promoting healthier lifestyles by **providing credible information, reliable advice** and quality services. <https://www.canada.ca/en/health-canada/corporate/about-health-canada/activities-responsibilities/mission-values-activities.html>

The fact that you state that Health Canada has nothing to do with ensuring that the cell phones being used by and sold to Canadians is both disturbing and confusing given your mandate. Just as concerning is the fact that the Canadian public is allowed to believe that Health Canada has safety standards and is enforcing them to "prevent and reduce risks" to their health and well-being.

Health Canada's website states:

1) "The limits set out in Health Canada's Safety Code 6 are designed to protect people, of all ages and sizes, from all forms of exposure to RF energy, including continuous exposure (**24 hours a day, seven days a week**)." <https://www.canada.ca/en/health-canada/services/environmental-workplace-health/reports-publications/radiation/fact-sheet-what-safety-code-6.html>  
(emphasis is mine)

2) "Cell phones in Canada must meet regulatory requirements that limit human exposure to RF energy."

<https://www.healthy Canadians.gc.ca/recall-alert-rappel-avis/hc-sc/2011/13548a-eng.php>

Given the above would you not agree that it is Health Canada's responsibility to provide the public with "credible information, reliable advice" regarding the cell phones found to be in violation by 3 different sources: Dr. Arazi, Dr. Om Gandhi, and the Chicago Tribune? Can you please tell me if Health Canada intends to do so and, if so, in what format?

Given that one of Health Canada's objective is to "prevent and reduce risks to individual health", would you not agree that it is Health Canada's responsibility to ensure the testing of off -the-shelf cell phones of the various models identified as being in violation of France's guidelines (SAR 2.0 W/kg), which is higher

than Canada's (SAR 1.6W/kg)? Many of the phones tested exceeded the guidelines by many times and this failure has escaped ISED's "audits".

Given that Health Canada admits that it has no safety standards, regulations or policies regarding cell phones, your department merely sets standards, e.g. Safety Code 6, and then hands them off to ISED. It does nothing to ensure that these guidelines are met and has no responsibility to ensure the safety of Canadians regarding any wireless consumer product. Would you agree that at the very least Health Canada has the responsibility to alert ISED to the fact that cell phones that have been found by others to be defective are being used by and sold to trusting Canadians, even children, who have been told there is no risk if used 24/7/365?

ISED's mandate is very different from Health Canada's. Its mission is to promote and support business: "to foster a growing, competitive and knowledge-based Canadian economy." No where in its mission statement is there anything about protecting the public's health.

Frankly, Mr. Ahier, this seems a case of the fox guarding the henhouse. Why would ISED wish to negatively affect the most profitable business in the world, one which through licensing and purchases of sections of the RF spectrum puts billions of dollars each year into the Federal bank account?

Until you, Health Canada and ISED take action, cell phones that emit radiation many times more than "allowed" under SC 6 are being used by and sold to a public who believes Health Canada is protecting them. You are failing to fulfill your mandate of providing "credible information and reliable advice." Parents who search your website for information are being misled to believe that Health Canada is ensuring that cell phones, as well as all wireless devices, are safe -- even for their children to use.

ISED is safeguarding the telecoms. Who is watching out for us? According to your response, Mr. Ahier, it appears no one is.

I do look forward to receiving your response.

Sincerely,  
Sharon Noble

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**From:** "snoble19" <snoble19@shaw.ca>  
**To:** "isi minister-ministre isi" <isi.minister-ministre.isi@canada.ca>  
**Sent:** Thursday, July 30, 2020 11:52:33 AM  
**Subject:** Cell phones exceeding SC 6 SAR

Dear Hon. Mr. Bains,

The Department of Innovation, Science and Economic Development (ISED) is responsible for enforcing the Radiocommunications Act which ensures that radiation emitting devices such as cell phones sold and used in Canada fall within the guidelines established by Health Canada, Safety Code 6.

I therefore am directing to you, Mr. Bains, the concern regarding the current use and marketing of cell phones which emit levels of radiation many times higher than the SAR limit of 1.6 W/kg.

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.

As far as I've been able to determine, ISED has not done any testing of off-the-shelf devices as a result of the findings noted above. Many of the cell phones which have been found by agencies other than ISED to have exceeded the standards established by Safety Code 6, for example the Razer Phone 2, are still being used and sold in Canada. Can you please explain why the Radiocommunications Act has not been enforced by ISED with regard to these devices?

Thank you for your time. I look forward to receiving your response at your earliest convenience.

Regards,  
Sharon Noble  
Victoria, BC

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**From:** "rpb / brp (HC/SC)" <hc.rpb-brp.sc@canada.ca>  
**To:** "snoble19" <snoble19@shaw.ca>  
**Sent:** Wednesday, July 29, 2020 12:49:01 PM  
**Subject:** RE: Radiation Emitting Devices Act

Dear. Ms. Noble

Thank you for your email of July 18, 2020 concerning the safety of cell phones in Canada, and Health Canada's *Radiation Emitting Devices Act*.

Health Canada's mandate regarding human exposure to radiofrequency electromagnetic fields (EMF) is to carry out research into possible health effects, monitor the scientific literature related to such effects and to develop recommended



exposure guidelines, known as Safety Code 6. Health Canada also administers the Radiation Emitting Devices Act (REDA), which governs the sale, lease and importation of radiation emitting devices in Canada. The *Radiation Emitting Device Regulations* set out radiation safety standards for labelling, construction and performance for certain classes of radiation emitting devices; these are the prescribed “standards” referred to in paragraph 4(a) of the Act, which deals with prohibitions.

Please note there are no standards applicable to cell phones or other wireless communication devices under the *Radiation Emitting Devices Regulations*. In Canada, the regulation of cell phones and other wireless communication devices is the responsibility of Innovation, Science and Economic Development Canada (ISED), under the *Radiocommunication Act*. To ensure that public exposures fall within acceptable guidelines, ISED has developed regulatory standards that require compliance with the human exposure limits outlined in Safety Code 6. ISED conducts regular audits to help ensure that devices on the market and antenna installations are compliant. Any questions regarding testing and compliance of cell phones should be directed to ISED: [http://www.ic.gc.ca/eic/site/icgc.nsf/eng/h\\_07026.html](http://www.ic.gc.ca/eic/site/icgc.nsf/eng/h_07026.html).

When developing the exposure limits in Safety Code 6, Health Canada scientists consider all peer-reviewed scientific studies and employ a weight-of-evidence approach when evaluating possible health risks. There have been thousands of scientific studies carried out to evaluate the safety of radiofrequency EMF. The evidence from these studies establishes two adverse health effects from exposure to intense radiofrequency EMF: tissue heating (like the warming of your skin) and nerve stimulation (a tingling sensation in your skin). To protect the public, the limits in Safety Code 6 are set far below the thresholds for the occurrence of these health effects.

As with most scientific conclusions, it is possible to find differing scientific opinions. There are scientific studies that have reported biological effects of radiofrequency EMF exposures that are below the limits in Safety Code 6. However, these studies are in the minority, are very far from conclusive, and do not represent the prevailing line of scientific evidence in this area. It is important to note that a biological response, as reported in some studies, does not necessarily translate to an adverse health outcome in humans.



The exposure limits and the conclusions of Health Canada are consistent with the science-based standards used in other parts of the world, including the United States, the European Union, Japan, Australia, and New Zealand. Large safety margins have been incorporated to provide a significant level of protection for the general public and personnel working near radiofrequency EMF sources. Internationally, while a few jurisdictions have applied more restrictive limits for radiofrequency EMF exposures, scientific evidence does not support the need for limits that are more restrictive than Safety Code 6.

It is Health Canada's position that the health of Canadians is protected from radiofrequency EMF when the human exposure limits recommended by Safety Code 6 are respected. Safety Code 6 has always established and maintained a human exposure limit that is far below the threshold for potential adverse health effects. If new scientific evidence were to demonstrate that exposure from wireless technologies, including cell phones, below the Canadian limits is a health concern, the Government of Canada would take appropriate action to help protect the health and safety of Canadians.

For reliable information about radiofrequency EMF and your health, please consult the following websites:

[Safety Code 6](#)

[Radiofrequency energy and safety](#)

[Cell phones, cell phone towers and other antenna installations](#)

Thank you for writing

Brian Ahier

A/Director General | Directeur général par intérim

Environmental and Radiation Health Sciences Directorate |

Direction des sciences de la santé environnementale et de la radioprotection

Health Canada | Santé Canada

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**From:** Sharon Noble <snoble19@shaw.ca>  
**Sent:** 2020-07-18 5:14 PM  
**To:** Ahier, Brian (HC/SC) <brian.ahier@canada.ca>  
**Subject:** Radiation Emitting Devices Act

Dear Mr. Ahier,

Health Canada, and specifically the Environmental and Radiation Health Sciences Directorate of which you are the Acting Director, governs 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. Can you please explain why the Radiation Emitting Devices Act has not been enforced by Health Canada with regard to these devices?

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

Regards,  
Sharon Noble  
Victoria, BC

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**From:** Sharon Noble <[citizensforsafertech@shaw.ca](mailto:citizensforsafertech@shaw.ca)>  
**To:** [Navdeep.Bains@parl.gc.ca](mailto:Navdeep.Bains@parl.gc.ca); [Ginette.Petitpas-Taylor@parl.gc.ca](mailto:Ginette.Petitpas-Taylor@parl.gc.ca)  
**Date:** 29 Aug 2019  
**Subject:** Cell Phone Recall

Dear Minister Petitpas-Taylor and Minister Bains,

At least 4 years ago, studies showed that up to 90% of popular cell phones exceeded allowable European Specific Absorption Rates (SAR) limits, limits which are higher than Canada's. Yet Health Canada and ISED have been silent on this issue, even continuing to say that cells phones are safe, even for children.

Cell phones are used by approximately 90% of Canadians, including very young children. Health Canada established SAR at 1.6 W/kg at 5mm from the head many years ago when there were

fewer subscribers and far fewer studies showing potential harm from microwave radiation, and long before this radiation was classified as a possible human carcinogen by WHO's International Agency for Research on Cancer.

As defined by Dr. Devra Davis:

**"The SAR is a measure of the maximum amount of microwave radiation absorbed by a test dummy, not the amount of microwave radiation emitted by a wireless device.**

**The SAR was based on a model of the human head taken from a military recruit at the top 10% in height and weight, and thus falls in the top 3% of all persons using phones today, when millions of children and smaller adults use these devices. Today most adults and growing numbers of young children use phones for thousands of minutes each month, according to PEW Foundation surveys and reports from the CTIA." <https://ehtrust.org/take-action/educate-yourself/sar-of-cell-phones-specific-absorption-rate/>**

In 2015, the French National Frequencies Agency (ANFR) investigated 450 models (including many of the most popular) of cell phones and found that 90% of them exceeded the European SAR level of 2W/kg by 200-400% or 1100% of the Canadian standard when held 10-15mm from the body. [https://ntp.niehs.nih.gov/ntp/about\\_ntp/bsc/2018/june/publiccomm/phonegatealert\\_20180612\\_508.pdf](https://ntp.niehs.nih.gov/ntp/about_ntp/bsc/2018/june/publiccomm/phonegatealert_20180612_508.pdf)

In 2017, CBC conducted an investigation into cell phones and found that 3 popular devices exceeded the guidelines by a significant amount. <https://www.cbc.ca/marketplace/blog/company-responses-cellphones>

In April 2019, Dr. Om Gandhi reported that cell phones tested in the US exceeded SAR levels by several fold. <https://ieeexplore.ieee.org/document/8688629/references#references>  
**Om Gandhi**

In August 2019, the Chicago Tribune reported on its independent tests on 11 popular phones which confirmed all of the above. Cell phones are emitting higher levels of radiation than allowed by FCC and ISED when tested using the Federal guidelines -- held 10-15

mm from the head and body. <https://www.chicagotribune.com/investigations/ct-cell-phone-radiation-testing-20190821-72qgu4nzlfda5kyuhteiih4da-story.html>

The very same cell phones that failed tests are being used and continue to be sold in Canada yet the Ministry of Health has taken no action. Health Canada has failed to recall these phones or warn the public even though it has known for years that telecoms are not following SAR guidelines and that ISED is not monitoring these consumer products. It is this Ministry's responsibility to immediately inform Canadians about the excessive radiation levels and the potential harm that could result from using or carrying a cell phone near their bodies.

As is done when other products, like children's hoodies with strings or Scotchgard that failed to have a bilingual label, are thought to pose dangers, these cell phones should be recalled immediately. 30-40 million people are being put at risk, many of them children.

Yours sincerely,

Sharon Noble  
(address omitted)