

TO CICRA by email to [info@cicra.gg](mailto:info@cicra.gg)

Submission on DRAFT “5G Spectrum: Draft Statement of Intent”.

Author David Green, resident in Guernsey. I have no vested financial or other interest in submitting this document.

(Supported by other residents and friends of Guernsey as listed at the end of this submission).

Dear Sirs

14<sup>th</sup> June 2019

My background is in finance. I was a Eurobond trader, merchant banker and headed up a finance house which included assessing risk and signing off finance transactions amounting to over £100 million per annum. I have seen tens of thousands of proposals and I understand risk as well as the next person.

Transactions and proposals fit into three categories: Too good to be true, non-starters and those that fit in the grey area. To sign off any transaction in any field including 5g, no stone can be left unturned; ignorance and reliance on the varied recommendations of other authorities needs to be verified, tested and full research must be considered especially when human lives are involved as is the case with 5g.

Some of the key questions on considering a proposal of 5g are I believe: Why are we doing it? Who says we need it? Are we being persuaded by vested interests? What’s the hurry? What are the real benefits? What are the disadvantages? What can go wrong? Are there any litigation risks or liability risks? Do we have all the information needed to really assess the risk? Can we guarantee the public’s health and safety and what is the short and long-term risk on our valued residents who could become seriously ill from any wrong decision?

The motto that I always kept in mind on decision making was “if in doubt, leave it out”. I hope our leaders and decision makers will do the same.

### **WIFI, 3g, 4g, Masts: Is it safe or not?**

Having immersed myself in as much scientific evidence and viewed talks and videos including some [real people who became severely ill](#) due to the use of mobile phones, I believe that it will be a brave set of people who sign off on 5g without before demanding to see all independent scientific evidence first-hand

available now on EMFs and carrying out our own studies and research as mentioned further down.

Secondly, with mental health, alcohol and cigarette addiction, obesity, gambling and other social issues etc to solve for our hardworking and well-meaning politicians, civil servants and community, standing still now and again to stop and think is not a bad thing and is one of the attractions of Guernsey.

Thirdly, I believe that we can use this opportunity to become a world leader in EMF regulations and to carry out a world's first in-depth scientific study of the effects of WIFI, 3g/4g and masts **in Guernsey** before jumping ahead to 5g. Instead of following the sheep, this could be a great opportunity for Guernsey to become a world market leader in EMF legislation and leadership and would give great publicity for the island standing up for the health of its citizens in line with the declared policy of making Guernsey the healthiest and happiest place to live in the world. We pride ourselves in our tight financial regulation so this should be no different.

Separately, I don't hear people complaining about the speed of 4g and ultimately our small population and delicate environmental infrastructure cannot be put at risk for the sake of increasing the wealth of a few, even if that means rejecting monies for extra bandwidths for Guernsey itself.

The reams of scientific evidence and credible testimonies on the dangers of EMFs is eye-opening (some of which are listed below in my letter to the Deputies) is a harsh reminder of how governments turned a blind eye on tobacco, strongly lobbied by the tobacco industry, ignored many scientists and the US Surgeon General in 1964 warning that cigarettes were dangerous and would lead to cancer and heart disease. 7 million lives are still lost each year because of this and we all know how the tobacco industry fought using evidence from chosen scientists denying for decades that this was untrue.

Relying on ICNIRP, WHO etc does not seem adequate if people are already dying from EMFs. We the innocent public rely on our leaders to have carried out their own real due diligence before making decisions on our health. The effects of 5g will be mandatory on all of us. Too often we are assured by suppliers of drugs and products by authorities, governments and "experts" that we are safe: To name a few: as mentioned tobacco, Roundup, thalidomide, haemophiliacs being given infected blood etc. were all deemed to be safe.

Can we be certain that nobody on our beautiful island has already been the innocent victim of being seriously ill due to Electromagnetic fields (EMFs)?

Below is a letter sent to our deputies on 10<sup>th</sup> June 2019 which I and the other signatories would like to be put on record and to become part of your review when you consider the health aspects of 5g which to my knowledge has not been proved to be safe. There are important links within the text for your consideration as well as I am sure the other thousands of scientific studies that you have on file already.

For the record, it is disappointing that my request for this draft consultation to be extended was declined due to lack of public awareness and an important deputy disclosed that they were also unaware that this was now taking place.

**When making your considerations, CICRA and The States of Guernsey should I believe consider:**

Whether we have carried out tests and surveys on residents living or working near masts in say the last ten years? If not why not?

Have we consulted with MSG, the hospital and our doctors to see if there has been any uptick in brain cancer or other illnesses in adults or children in the past ten years which could be attributed to EMFs?

Why do many countries in the world have laws regarding WIFI and mobile phone use on health grounds in offices and schools, use and sale of mobile phones by children etc? To my knowledge Guernsey does not seem to have any legislation or public health warnings. If not why not? Has CICRA ever recommended any?

What has CICRA done to lessen any adverse impact on the environment as is stated in The Regulation of Utilities (Bailiwick of Guernsey) Law, 2001?

For example, what has CICRA done to ensure there are no negative effects on wildlife and nature?

What due diligence was carried out by CICRA and the Guernsey government on the health risks of 3g/4g and masts?

Even in USA, are you aware that masts have been banned on fire-stations because of health issues experienced by firefighters? [See video. 2 minutes 46 seconds onwards.](#) Does CICRA and the States of Guernsey know about this?

I previously asked the following question of a very helpful Sarah Price at CICRA but following her answer I have additional concerns noted below:

I asked Sarah:

**“What current legal protection, policies or advice is in place in Guernsey for the health and safety for the consumer as we are today regarding using mobile phones, wifi, living or working near masts?”**

Telecoms operators are responsible for ensuring that emissions from their radio masts meet the standards set down by the International Commission for Non-Ionising Radiation Protection (ICNIRP). The ICNIRP emission standards are recognised by the World Health Organisation, and are used within the European Union and other regions as a benchmark against which to measure radio-frequency transmissions. These standards and further information on the use of mobile phones, wifi and masts can be found at: [www.icnirp.org/](http://www.icnirp.org/) and, in particular, [www.icnirp.org/en/applications/index.html](http://www.icnirp.org/en/applications/index.html).

DG: Thank you for your reply. So as far as you are concerned in CICRA’s role to “inform and protect consumers” no other tests or research are required and this once per annum mast emission test is enough?

Sarah referred me to her first answer above.

If your answer is yes, then, do you have existing warranties and guarantees in place from the telecom companies and ICNIRP on 3g/4g, in case later consumers are actually harmed and take legal action against the telecoms companies, CICRA or the Guernsey government? If you do can you please advise what the amount of such guarantees are and if they are insured?”

**This crucial question about risk to avoid multi party litigation against Guernsey I believe needs to be thought about.**

**5g: There must be lots of scientific evidence to tell us it’s safe?**

My understanding is that there is not one scientific study that confirms 5g is safe. We wouldn’t allow a drug to be introduced like this and nor should we. I am concerned that we don’t have any legislation now for what we have or if any real health due diligence was carried out before 3g and 4g arrived.

There are reports emerging stating that children are at particular risk from using mobile phones. See C. E. Fernández-Rodríguez et al study on [SAR brain absorption](#) as one example of many scientific studies.

In CICRA's role "to inform and protect the consumer" as stated in their [mast report](#) dated November 2017, I would like to know what CICRA and the States of Guernsey has done or recommended so far to regulate the sale of mobile phones on health grounds? To my knowledge Guernsey has no legislation, guidelines or restrictions regarding the use of internet, WIFI and mobile phones in spite of plenty of evidence and other countries following this sensible course of action.

Is CICRA aware or has since this report issued any health warnings after the release of the National Toxicology Programme where Hardell and Carlberg have published their [expert commentary](#) on the US National Toxicology Program study on rats and mice. **They conclude in their paper "that there is clear evidence that RF radiation is a human carcinogen, causing glioma and vestibular schwannoma (acoustic neuroma)."** The paper additionally considers other cancer endpoints. For example, with regard to the rising increase in incidence of thyroid cancer, the authors state that "there is some evidence that thyroid cancer is caused by RF radiation in humans. The authors conclude that there is "clear evidence that RF radiation is a multi-site carcinogen. Based on the Preamble to the IARC Monographs, RF radiation should be classified as carcinogenic to humans, Group 1."

**To conclude, I believe that Guernsey should "Say NO to 5g until we are sure it is safe."**

Letter dated 12<sup>th</sup> June 2019 sent to the Deputies of Guernsey:

Dear Deputies

**5g is coming to Guernsey! Can we be sure that it is safe or do we want to become guinea pigs for a human experiment in Guernsey?**

I found out last week that there is an important [CICRA consultation](#) (the regulator) on behalf of Guernsey and Jersey regarding 5g which is taking place right now with **a cut-off date for replies of 14<sup>th</sup> June 2019 by 5pm**. I asked CICRA for an extension of this date on the grounds that none of the public knows about this important document, but they refused to give an extension to this date on the basis that there would be time for the public fears to be allayed and 'consulted'.

**To contribute, the public who knows nothing about this and others are supposed to write to [info@bicra.gg](mailto:info@bicra.gg) with the subject line "5G Spectrum: Draft Statement of Intent".**

**I understand that you will be voting on this matter in the Autumn for 5g to be live in 2020.**

## Background

5g is scheduled to be quickly rolled out in 2020, even though to my knowledge none of us are complaining about the super speed of 4g.

Some of us are very concerned about the health risks of 5g as residents of Guernsey.

I've been doing a bit of research which I wanted to share with you:

Many governments in Europe (including Guernsey and Jersey) rely on the advice of a private company based in Germany called [ICNIRP](#) to set 'safe' radiation guidelines. I understand these were last set in [1998](#). Once per annum, a telecoms company comes to Guernsey and selects a few masts to do radiation tests nearby and states that they are within the ICNIRP limits. Job done. We are allegedly safe.

When you read the information below you may conclude that this is not good enough.

**My research which only covers some of the risks has shown that:**

In 2011, WHO classified radiofrequency electromagnetic fields as possibly **carcinogenic** to humans (Group 2B), based on an increased risk for glioma, a malignant type of brain cancer, associated with **wireless** phone use;

[230 leading doctors and scientists](#) from over 40 countries have warned of the potential serious health effects of 5g.

**We are it seems at risk even before the introduction of 5g:** Please see this [short five minute video](#) from [Dr Devra Davis](#) one of the world's leading epidemiologists. She covers topics such as the halving of sperm rates by men keeping phones in their pockets; **digital dementia diagnosed in children** in South Korea; Australia and Turkey issuing health warnings about the use of mobile phones; Belgium banning the sale of phones to children under 7 etc.

Brain cancer, glioblastoma multiforme (GBM), linked to mobile phone use, more than [doubled in England](#) between 1995-2015. Other countries are experiencing similar uplifts.

[Breast cancer](#) with women keeping phones in their bras has been found also;

Countries and cities such as The Netherlands, Geneva and even Brussels, the epicentre of the EU, have halted 5g until further research is carried out;

The Brussels health minister Céline Fremault (CDH) halted 5g and said: **“I cannot welcome such technology if the radiation standards, which must protect the citizen, are not respected, 5G or not. The people of Brussels are not guinea pigs whose health I can sell at a profit. We cannot leave anything to doubt.”** ;

Many countries already have (even before 5g) many [health restrictions and public advice](#). WIFI is banned in many schools and strict legislation is in place on the sale of phones etc. What does Guernsey recommend? I could not find anything at all and when we buy a mobile phone there are no health warnings given.

Regarding ICNIRP, [Lloyds of London](#) and others don't seem to take their opinion as sacrosanct or why would they exclude future claims from Electro Magnetic Field's (EMF)?

[Swiss Re](#), the world's second largest reinsurer has just announced that **“existing concerns regarding potential negative health effects from electromagnetic fields (EMF) are only likely to increase. An uptick in liability claims could be a potential long-term consequence. Growing concerns of the health implications of 5G may lead to political friction and delay of implementation, and to liability claims. As the biological effects of EMF in general and 5G in particular are still being debated, potential claims for health impairments may come with a long latency.”** I am sure you will agree this is an incredible statement to read from a huge corporation.

In addition, the world's largest study the \$25mn program called National Toxicology Programme ([NTP](#)) shows ‘the inconvenient truth’ that significant increases in the incidence of brain and heart cancer in animals exposed to EMF **below** the ICNIRP guidelines.

Here is a longer video to watch about [the background to the science of mobile phones and the health risks](#) with many facts including the dangers of keeping a phone near young children and pregnant women etc. I can recommend the resources shown on their ‘not for profit’ [Environmental Health Trust](#) which is run by top scientists and doctors and taps into the world's leading scientists reports and is constantly updated.

Instead of running ahead with 5g, I believe instead that we should be looking carefully at the effects of 4g, masts and WIFI **now on us the innocent** public and the effects on the beautiful environment where we live.

Surely, it's better to be safe than sorry. **We surely need to put health for all before wealth for a few.**

Perhaps some of the questions we should be asking are:

Whether people living or working near masts are becoming unnecessarily sick in the long term? It's ironic that the roof of Beau Sejour Leisure Centre, a place to become fit and healthy, is covered with masts!

See article headed ["14 die of cancer in seven years living next to phone mast with highest radiation levels in UK"](#). A coincidence?

Are we setting ourselves up for long term health issues through working in offices with WIFI on all day and constant use of our mobiles?

What surveys on health has Guernsey carried out in the last ten years or even five years on the effects of radiation from WIFI, 4g, mobile phones and masts?

Could this be a contributor as to why cancer and other illnesses are on the up here and around the world?

What is SAR and why should we care if most of us have never heard of it?

How are pregnant women and their babies being affected by WIFI and mobile phones?

If our brains are being affected by EMF's, then this affects our mental health, a high profile topic in Guernsey.

Why are there no public health warnings as there are for cigarettes and alcohol, (two known killers) in Guernsey about any of the areas covered in this email?

**No public health warnings means we the public assume our leaders have done their due diligence on our behalf so we think it is safe.**

Do our employers and schools issue health and safety warnings for their employees on EMF as is required by law in other countries in the world?

Why are there no health warnings when we buy a mobile phone?



Has there been an uplift in brain cancer or other illnesses identified to be associated with EMF's on the island? What studies has our government done? [Studies](#) show we are getting sicker. Why aren't we looking at the cause instead of the effect?

How are our children being affected with WIFI at school and how safe are mobile phones for children? If [France and Russia](#) have taken steps to limit and ban WIFI in schools in favour of ethernet, why hasn't Guernsey and why limit this policy to schools? All residents deserve to live in a healthy environment.

How is our environment being affected by EMFs?

If there is no risk to our health, then why has an [Italian Court](#) already ruled a mobile phone caused a brain tumour?

And finally, what are the huge uninsurable, immeasurable long term legal, political and financial risks of potential legal claims against Guernsey, it's decision makers, and all employers if residents and employees prove now or in the future that 4g/5g/WIFI/phone masts etc have made them ill?

EMFs could quickly become the biggest "no win/no fee" legal claims area in history.

In addition, if WIFI/mobile phones/masts etc are truly safe, then why are companies like AT & T and Vodaphone reporting that they face or may face claims in the future in this regard?

I personally believe that this will be a bigger issue of controversy than the incinerator once the public becomes aware of the facts.

There is a Facebook page called [5g Risk Awareness Guernsey](#) and perhaps in due course petitions and a strong group of likeminded people will emerge. I also cannot see how with the scientific evidence available now that you will be able to guarantee the public safety by passing 5g.

I hope that common sense and caution will prevail with an indefinite moratorium on plans to speed through 5g.

Instead we surely need urgently a proper public health policy on what damage is being caused now by EMFs?

Finally, I genuinely believe that in Guernsey (and the Channel Islands as a whole) that you and other decision makers really do their best and care. Let's continue to keep Guernsey and the Channel Islands as one of the safest, healthiest, and happiest places to live on the planet. We boast about life expectancy here, but longevity isn't much fun if most of us are ill!

Certainly it seems irrefutable, that there is enough evidence and worrying signs of fatal long term disease, to help you crown Guernsey as a world market leader in EMF prevention with the toughest regulation in the world by concluding:

[“Our citizens trust us to put public health before wealth and to SAY NO to 5g until we are 100% sure it's safe”.](#)

I will leave you with a quote from Albert Einstein: “The world is not dangerous because of those that do harm, but because of those who look at it without doing anything.”

I hope that you will invest the time to look through the links above to increase your knowledge of the real dangers involved and send on to any relevant parties.

I appreciate that you have a huge amount to occupy your time but look forward to hearing your comments please.

This letter has been sent also to our director of public health, Dr Nicola Brink.

Sincerely

David Green

Co-Signatories: 2 very concerned mothers: Sophie Shand & Laura Anderson Mancini.

Since this letter, in a short space of time, the following individuals have requested to be added as supporters of this letter:

Hayley Le Marquand (concerned resident).

Steve and Hannah Lord; Fire safety manager & a self employed physiotherapist with 3 children.

Bryan and Jill Marsh, Retirees and Complementary Therapist, parents of 3 children and 7 grandchildren, Residents of Guernsey since birth.

Aivis & Jessica Kergalvis - Fire Fighter and Yoga Teacher - Guernsey Residents

Elisabeth Beckett, Entrepreneur and visitor to Guernsey

Margot Borden, Psychotherapist and visitor to Guernsey

Yaniv & Nessi Gomes - Musician and music therapists. Parents of 1 kid. Residents of St Peters, Guernsey.

E&OE