



**Contact address:**

Chairman Mr. Brian Stein CBE,  
EM Radiation Research Trust,  
Chetwode House, Leicester Road,  
Melton Mowbray,  
Leicestershire, LE13 1GAUK

17<sup>th</sup> October 2023

**The Rt Hon Claire Coutinho MP, Secretary of State for Energy Security and Net Zero**  
House of Commons,  
London SW1 0AA

The Rt Hon Claire Coutinho MP, Secretary of State for Energy Security and Net Zero  
[Claire.coutinho.mp@parliament.uk](mailto:Claire.coutinho.mp@parliament.uk)  
Cc. Ofgem: [consumersaffairs@ofgem.gov.uk](mailto:consumersaffairs@ofgem.gov.uk)  
Freedom of Information requests [foi.request@energysecurity.gov.uk](mailto:foi.request@energysecurity.gov.uk)  
Brian Stein CBE, EM Radiation Research Trust Chairman

Your ref: **FO12023/20332**

Sent via Email from: [eileen@radiationresearch.org](mailto:eileen@radiationresearch.org)

**For the attention of The Rt Hon Claire Coutinho MP, Secretary of State for Energy Security and Net Zero, Smart Metering Implementation Programme.**

Thank you for letters responding to the EM Radiation Research Trust (RRT) letter of complaint against the Energy Bill and Smart Meters sent to your department on 18<sup>th</sup> September 2023 and for approving our request to publicly share both letters of response received from your department. Link to RRT letter of complaint: <https://www.radiationresearch.org/wp-content/uploads/2023/09/LETTER-OF-COMPLAINT-ENERGY-BILL-1.pdf>.

The RRT letter of complaint was subsequently promoted via Richard Vobes YouTube channel with the title: **A Complaint because they are dangerous!**

<https://www.youtube.com/watch?app=desktop&v=ShpP22d7Wxg>

Letter of response received on **3<sup>rd</sup> October 2023** from the **Department of Energy Security & Net Zero** in response to the RRT Letter of Complaint against the Energy Bill and Smart Meters.

<https://www.radiationresearch.org/politics/letter-of-response-from-the-department-of-energy-security-net-zero-in-response-to-the-rrt-letter-of-complaint-against-the-energy-bill-and-smart-meters/>

Letter of response received on **6<sup>th</sup> October 2023** from the **Department of Energy Security & Net Zero, Information Rights Team** following a freedom of information request from the RRT calling on the Government to provide commercial public liability insurance details for the smart meter

industry. <https://www.radiationresearch.org/wp-content/uploads/2023/10/Information-Rights-Team-FOI2023-20332-Response.pdf>

The EM Radiation Research Trust concerns are summarised below.

The Government's primary responsibility is the protection of its citizens from harm. The microwave emissions from a mass rollout of smart meters presents a health hazard to the population according to many doctors and scientists and it is disappointing your response disregards these concerns. It is also surprising to hear that the Government does **NOT** hold any information regarding public liability insurance for the wireless industry. The RRT called on EDF Energy earlier this year asking them to provide commercial public liability insurance policies for claims directly or indirectly arising out of, resulting from, electromagnetic fields/ wireless RF radiation, microwave radiation. We did not receive an answer to this question and therefore assume liability Insurance cover may not exist. Surely, the Government should check if the companies rolling out smart meters or wireless telecommunications equipment holds public liability insurance which covers claims for ill health due to wireless radiation? Electrosensitive claims have been recognised in the UK courts as referred to in the RRT letter of complaint against the Energy Bill and smart meters.

1. **Net zero / Zero Choice**

We have been inundated with calls for help from utility customers who have been informed by their supplier that they are no longer installing analogue meters as per government guidelines. One family appealed to the energy supplier and ombudsman on health grounds and were informed a court order could be imposed to enter their property to install a smart meter. Whilst the matter was eventually resolved after escalation to our charity and the local MP, this should not be the case. Your assurance that the smart metering rollout is underpinned by consumer choice equates to empty rhetoric in practice if customers have no choice. Zero customer choice has the same effect as a mandate in all but name.

→ **Guidance**

**Utility customers should be protected and not required to accept smart meter hazards as a condition of receiving electric, gas, and water services.**

→ **Action**

**Government should protect customer choice ensuring analogue meters remain available. Excessive installation and running costs, threats, discrimination and harassment by industry or government are not acceptable with regards to life, liberty, or health.**

2. **Smart Meter Emissions: a Health Hazard**

Microwave radio frequencies as emitted by smart meters are recognised as a class 2B carcinogen by the WHO: [https://www.iarc.who.int/wp-content/uploads/2018/07/pr208\\_E.pdf](https://www.iarc.who.int/wp-content/uploads/2018/07/pr208_E.pdf).

The BioInitiative Working Group reviewed thousands of scientific papers that show biological harm from such radiation emissions. This group of experts calls for the precautionary approach and urgent action due to chronic EMF-related diseases that are a potential risk for everyone. <https://bioinitiative.org/conclusions/>

A percentage of the population is sensitive to and affected by microwave emissions as used in modern life and need to avoid mobile phones, wireless routers, bluetooth, emitting masts and smart devices. ([link](#))

The 2017 Ecologist Report mentions how smart meters 'emit as many as 14,000 short bursts of intense microwave radiation a day, disrupting cellular electrochemistry and causing health symptoms from migraine to tinnitus, insomnia, dizziness, anxiety, chest pain, palpitations, and memory loss. Now a growing number of 'electro-sensitives' have had enough. [Ref.](#)

Government and industry scientists claim exposure to radio waves from smart meters is likely to be lower than everyday devices such as mobile phones, but sadly, this does not offer any reassurance. Current levels of exposure are **not safe** according to many independent experts including Jerry Flynn, Top cleared NATO officer Electronic warfare specialist. Quote: "The radiation from smart meters is stronger than the radiation which, when the Soviet Russians irradiated the US Embassy in Moscow for 22 years, caused a number of cancers, birth defects and other health problems." Reference to the quote from Jerry Flynn is contained within the opening pages of the report – **Smart Meters, The Law & Health:** [https://einarflydal.com/sdm\\_downloads/download-smartmeters-dirty-electricity-pulses-and-health-pdf/](https://einarflydal.com/sdm_downloads/download-smartmeters-dirty-electricity-pulses-and-health-pdf/)

→ **Guidance**

- a. Utility customers should retain the right to opt out of a smart meter to protect their health and that of those living with them, their neighbours, and their community.
- b. Persons affected by such emissions should not be discriminated against by effectively being forced to install a smart meter in their own home that may harm them and prejudice peaceful enjoyment of their property.

→ **Action**

**Government should protect citizens and communities from harm by ensuring analogue meters remain available to customers without prejudice or discrimination.**

3. **Non-consensual Assault**

Smart meter emissions should not impact or penetrate the body of persons within range, (e.g. ICNIRP standards inform that 6GHz frequency penetrates tissue to a depth of 8.1mm [\[ref.\]](#))

Successful 'cease and desist' notices have been issued against authorities and emitters on grounds of assault against the person. Barrister Ray Broomhall (Australia) explains:

'What this has come to is humanity is being assaulted. These wireless frequencies are an assault on the human body. This is where the battle lines are. The Crimes Act in NZ 1961 – Under Section 2 – gives an interpretation – An assault means the act of intentionally applying or attempting to apply force to the person of another – directly or indirectly or threatening by any act or gesture to apply such force to the person of another. Electromagnetic radiation is a force and if you do not consent to it – then whoever is touching you or penetrating you – must stop. Otherwise, it is an offence under the Crimes Act 1961.' Although Mr. Broomhall's party mentions 5G, their concerns include

the wider frequency bands and microwave emissions as used in mobile telecoms. The principle of informed consent would equally apply to smart meters microwave RF emissions. [Link](#):

Microwave emissions from smart meters constitute a force that acts upon and penetrates a person's body from which there is no escape. For the electrosensitive this non-consensual force acting upon and in their persons is akin to physical, mental, and emotional torture. Assault against the person is a criminal offence. Government should not be party.

→ **Guidance**

- a. **Government should protect all citizens equally and not discriminate against certain groups in terms of health and well-being.**
- b. **Government should uphold the right of citizens to enjoy their property free from harm or the threat of harm from irradiation being imposed upon them in their home.**
- c. **Government should uphold the rights of all citizens to be free from the physical force and penetration of non-consensual irradiation and should not endorse policy that gives ground to assault against the person.**

→ **Action**

**Government should protect citizens and communities from harm by ensuring analogue meters remain available to customers without prejudice or discrimination.**

4. **Irrelevant Safety standards**

It seems highly unwise for the Government to rely on ICNIRP's guidelines which have little -- if any--relevance in the real world. The guidelines issued by this invitation-only, unelected private member's group are irrelevant when thinking about smart meter irradiation for the following reasons:

**Thermal heating only is irrelevant.**

- i. ICNIRP guidelines relate to thermal heating, shocks, burns and heatstroke, and do not take into account typical harmful health effects including electrosensitivity, cancer, immune suppression, neurodegenerative diseases including Alzheimer's, Parkinson's and ALS, behavioral problems, learning disabilities, birth defects and infertility and many other health issues.

**6 Minute Exposure is irrelevant.**

- ii. ICNIRP testing for thermal heating to a patch of skin is averaged at just 6 minutes exposure.
- iii. The public will be exposed to this form of radiation 24/7 for a lifetime (10 years = 5,256,000 minutes).

**Health Hazard for medical devices**

Radiofrequency EMF's can fatally disrupt/disabled medical devices, including pacemakers "some exposure scenarios are defined as outside the scope of these guidelines". "EMFs may also interfere with electrical equipment more generally (i.e., not only implantable medical equipment), which can affect health indirectly by causing equipment to malfunction. This is referred to as electromagnetic compatibility, and is outside the scope of these guidelines (for further information,

see IEC 2014'

<https://www.icnirp.org/cms/upload/publications/ICNIRPrfgdl2020.pdf>

### Harm to Children

The ICNIRP standards are woefully inadequate in offering protection in the real world or real-life settings. The EM Radiation Research Trust is concerned for the health of children. Report by Professor Tom Butler – **On Clear Evidence of the Risks to Children from Non-Ionizing Radio Frequency Radiation: The Case of Digital Technologies in the Home, Classroom and Society.**

<https://www.radiationresearch.org/wp-content/uploads/2019/04/On-the-Clear-Evidence-of-the-Risks-to-Children-from-Smartphone-and-WiFi-Radio-Frequency-Radiation-Final-20201.pdf>

### ICNIRP standards since invalidated.

The relevance of ICNIRP's guidelines based on studies from the 1980's involving 40–60-minute exposures in 5 monkeys and 8 rats are no longer valid in the 21<sup>st</sup> century. [Ref](#)

### ICNIRP conflicts of interest.

The Turin Court of Appeal judgement confirms acoustic neuroma is linked to the use of mobile phones. The Judgement states: "conflicts of interest were for both ICNIRP and or SCENIHR members, who received, whether directly or indirectly financing from industry." [https://www.radiationresearch.org/wp-content/uploads/2020/01/Turin-Verdict-ICNIRP\\_Judgment-SUMMARY-of-the-Turin-Court-of-Appeal-9042019\\_EN-min.pdf](https://www.radiationresearch.org/wp-content/uploads/2020/01/Turin-Verdict-ICNIRP_Judgment-SUMMARY-of-the-Turin-Court-of-Appeal-9042019_EN-min.pdf)

### The government's use of ICNIRP is the primary issue.

Important message from Paolo Vecchia, ICNIRP Chair from 2004 until 2012. Presented at the EM Radiation Research Trust 2008 conference. He said: **"the ICNIRP guidelines are neither mandatory prescriptions for safety, the "last word" on the issue nor are they defensive walls for Industry or others."** The decision to adopt the ICNIRP guidelines as "sufficient to protect public health" is therefore political. Slide No (16): [https://www.radiationresearch.org/wp-content/uploads/2018/06/021145\\_vecchia.pdf](https://www.radiationresearch.org/wp-content/uploads/2018/06/021145_vecchia.pdf)

#### → Guidance

- a. Government need to recognise ICNIRPs 6 minutes as irrelevant for the real world when smart meters will emit for millions of minutes over decades.
- b. Government need to recognise ICNIRPS 'thermal only' basis as irrelevant for real world effects.
- c. Government should protect the vulnerable, including children and users of medical devices from harmful radiation emitted form smart meters.

#### → Action

- a. Government should abandon ICNIRP's guidance as no longer relevant in setting standards for public health and safety.
- b. Government should ensure analogue meters remain available to customers without prejudice or discrimination.

The EM Radiation Research Trust call on the Government to ensure analogue meters remain available:

1. To protect public choice with utility services.
2. To protect the public from health hazards associated with the microwave RF emissions from smart meters.
3. To protect the public from the forces from smart meter emissions acting upon and penetrating persons without consent.
4. To protect the public from outdated and irrelevant standards.
5. To protect the public from a mass, unwanted experiment.

The installation of smart meters constitutes an experiment in terms of safety. Experiments involving forces acting upon and or penetration of one's body should only be carried out with informed consent. *To carry out compulsory mass exposure to pulsed microwave radiation without the fully informed consent of the people affected is in contravention of the Nuremberg code.* Dr Andrew Goldsworthy [Ref](#)

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**Take Notice you have been fairly and equitably fore-noticed and fore-warned.**

Sincerely and without ill will, vexation, or frivolity,

Eileen O'Connor

Director EM Radiation Research Trust

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