Individual comment re docket HHS-OASH-2026-0397

My name is Davida Clegg. I was born in Dearborn Michigan in May, 1954. I moved to Canada when I married a Canadian in July, 1981. I have been diagnosed with electro hypersensitivity (EHS), by Dr. Riina Bray, M.D. In addition to her family practice, Dr. Bray is the Medical Director of the Environmental Health Clinic at Women's College Hospital and Assistant Professor in the Department of Family and Community Medicine with cross appointment to the Dalla Lana School of Public Health, University of Toronto. I have attached a letter from Dr. Bray to our local hydro utility, informing them that "A non-communicating meter is medically necessary for this patient to safely occupy her dwelling place and property without creating an unacceptable risk to her health." Our home is located in an area where there aren't any cell towers nearby. We have never had wi-fi in our home. I have a cellphone in my car, that is off at all times and available only for an emergency.

Unfortunately, Health Canada and the WHO acknowledge that "some people have reported an array of health symptoms that they attribute to exposure to EMF. At present, the symptoms attributed to EMF exposure have been termed idiopathic environmental intolerance (IEI-EMF) by the WHO, where "idiopathic" refers to unknown causes. This means that while the symptoms attributed by some persons to EHS are real, the scientific evidence provides strong support that these health effects are not associated with EMF exposure."

The scientific evidence contradicts this statement. One example is:

Dominique Belpomme, Philippe Irigaray (2022) *Why electrohypersensitivity and related symptoms are caused by non-ionizing man-made electromagnetic fields: An overview and medical assessment*
https://pubmed.ncbi.nlm.nih.gov/35537497/

Other references are provided below.

Two papers from Dr. Bray are also relevant:

Riina Bray MD, David Fancy PhD, (2020) *Clinical Practice Guidelines for EHS - Proceedings from a Symposium on the Impacts of Wireless Technology on Health*.
https://static1.squarespace.com/static/593f8894e3df288fc64b6cf0/t/5f974484c96dfb3e3bb07ff8/1603749014612/Clinical+Practice+Guidelines+for+EHS+and+Symposium+Proceedings+-+Final.pdf

Riina Bray MD (2020), *Clinical Practice Guidelines in the Diagnosis and Management of Electromagnetic Field Hypersensitivity (EHS)*
https://www.womenscollegehospital.ca/wp-content/uploads/2022/06/Preliminary-Clinical-Guidelines-for-EHS.pdf

Dr. Bray's testimony as an invited expert to the Canadian Parliamentary Health Committee can be found at:

https://www.ourcommons.ca/documentviewer/en/41-2/hesa/meeting-58/evidence?utm_source=chatgpt.com

The Canadian Human Rights commission paper *The Medical Perspective on Environmental Sensitivities* is also relevant.

https://publications.gc.ca/collections/collection_2008/chrc-ccdp/HR21-74-2007E.pdf?utm_source=chatgpt.com

I have included the Electromagnetic Hypersensitivity (EHS) Handout, Winnipeg MB as part of my submission.

I respectfully request the following:

1. Convene a truly independent multidisciplinary panel with appropriate expertise to systematically review the scientific evidence of the effects of electromagnetic radiation, with a focus on those with EHS. Rigorous scientific methods, transparency, full public consultation from initial scoping throughout the process, and health-protective precautionary interpretation of findings should be fundamental.
2. Build on the regulation of chemicals and pharmaceuticals; shift the burden of proof to the telecommunications and wireless technology industries, and require that they prove that their products are safe to us and our environment.
3. Ensure Americans' indoor and outdoor exposure to electromagnetic radiation from wireless technologies is kept as low as possible (ALARA or "as low as reasonably achievable") through proper regulation, monitoring, enforcement and ongoing public education and technical device management. One of many examples would be to require that all wireless devices and antennas not transmit (i.e., not emit radiation) when not in use.

Thank you,

Davida Clegg

<u>Other References:</u>

1. Belyaev I, Dean A, Eger H, Hubmann G, Jandrisovits R, et al. 2016. EUROPAEM EMF Guideline 2016 for the prevention, diagnosis and treatment of EMF-related health problems and illnesses. *Reviews on Environmental Health*. 31(3):

2. Canadian Human Rights Commission. 2007. *Policy on Environmental Sensitivities. Reviewed 2014.* Canadian Human Rights Commission. www.chrc-ccdp.gc.ca

3. Carpenter DO. 2015. The microwave syndrome or electro-hypersensitivity: historical background. *Rev Environ Health*. 30(4):217–22

4. Clegg FM, Sears M, Friesen M, Scarato T, Metzinger R, et al. 2020. Building science and radiofrequency radiation: What makes smart and healthy buildings. *Building and Environment*. 176:106324

5. Dieudonné M. 2016. Does electromagnetic hypersensitivity originate from nocebo responses? Indications from a qualitative study. *Bioelectromagnetics*. 37(1):14–24

6. Eltiti S, Wallace D, Zougkou K, Russo R, Joseph S, et al. 2007. Development and evaluation of the electromagnetic hypersensitivity questionnaire. *Bioelectromagnetics*. 28(2):137–151

7. Genuis SJ, Lipp CT. 2012. Electromagnetic hypersensitivity: fact or fiction? *Sci. Total Environ.* 414:103–12

8. Havas M. 2019. Electrohypersensitivity (EHS) is an Environmentally-Induced Disability that Requires Immediate Attentions. *J. Sci. Discov.* 3(1):20

9. Health Canada. 2015. Limits of human exposure to radiofrequency electromagnetic energy in the frequency range from 3 KHz to 300 GHz. Safety Code 6 (2015). , p. 24

10. Health Canada. *Electromagnetic Hypersensitivity. Site last modified 2011-09-30 and based on a World Health Organization Factsheet from 2005.* web.archive.org/web/20190517211626/https://www.canada.ca

11. Hedendahl L, Carlberg M, Hardell L. 2015. Electromagnetic hypersensitivity-an increasing challenge to the medical profession. *Rev Environ Health*. 30(4):209–15

12. Johansson O. 2010. Aspects of studies on the functional impairment electrohypersensitivity. *IOP Conf. Ser.: Earth Environ. Sci.* 10(1):012005

13. Johansson O, Hilliges M, Björnhagen V, Hall K. 1994. Skin changes in patients claiming to suffer from "screen dermatitis": a two-case open-field provocation study. *Exp. Dermatol.* 3(5):234–38

14. Levallois P, Neutra R, Lee G, Hristova L. 2002. Study of self-reported hypersensitivity to electromagnetic fields in California. *Environ Health Perspect*. 110(Suppl 4):619–23

15. Medical Conference Teaches about Illness from Too Much Wireless Radiation. https://www.newswire.ca/news-releases/medical-conference-teaches-about-illness-from-too-much-wireless-radiation-803331223.html.2019.May 31

16. Tseng M M-C, Lin Y-P, Cheng T-J. 2011. Prevalence and psychiatric comorbidity of self-reported electromagnetic field sensitivity in Taiwan: A population-based study. *Journal of the Formosan Medical Association*. 110(10):634–41