

The opinion of NGOs on the preliminary draft on Radio Frequencies and health effects

A draft report on Radio Frequencies and their health effects has been posted by the World Health Organisation (WHO) for public consultation. The report poses several problems, which the NGOs, signatories of this opinion and recognized stakeholders, would like to address.

The problems

1. The lack of transparency of the selection of experts responsible for the draft.
2. The failure to consult civil society.
3. The failure to demonstrate the independence of the experts
4. The striking absence of pluralism among the selected experts.
5. The biased reporting of scientific results.
6. The singular promiscuity between the WHO and ICNIRP, does it deviate the agency from its key missions: Public Health and Human Rights?

Hereby you will find our proposals to restore the dialogue and allow a pluralistic and impartial risk assessment – to the benefit of Public Health

The solutions

We ask that:

- The WHO EMF project establishes an extensive and sustainable *transparency policy* in order to promote a better dialogue and build trust.
- The NGOs, working for a better electromagnetic environment and the defence of the right of life and health for all, will be represented and consulted at the WHO EMF project in general and the RF-EMF task group in particular.
- The WHO EMF Project publishes the declaration of interest (DOI) of each expert and seeks to consult the most independent scientists possible.
- The WHO EMF Project opens its expert group to a representative and significant number of scientists who have found RF-EMF harmful effects to allow an objective assessment based on all scientific interpretations.
- Conflicting opinions are taken into account and published.
- The WHO EMF Project performs the assessment of RF-EMF taking into account the whole risk spectrum with one objective: *precaution and health protection*.
- Results of important recently published studies, Coureau 2014, for example, will be taken into account in the risk assessment.
- The WHO EMF project separates from ICNIRP in order to broaden its horizons and move towards improved concern for Public Health and a true defence of the rights and interests of citizens.

Our position

It is due time that the WHO EMF project takes responsibility and considers the scientific studies and empirical data demonstrating adverse effects of RF-EMF. Some scientists point out the cancer risk, others the neurotoxic, hormonal effects or sperm damage. Whatever the highest risk, the diseases are very serious, the exposure is massive and the children are the most vulnerable. Even a small risk will, in these conditions, have a significant negative effect on public health (suffering) and the health system (costs).

We must also consider the situation an emergency. A growing number of people already suffer from serious health problems related to the exposure to microwaves. The signals these "forerunners" send should be an incitation to the World **Health** Organisation to act, and to act quickly to revise the lax present standards, which only purpose is to promote industrial development, and to support new, truly protective public health standards.

Signatories

December 15th, 2014

IEMFA International EMF Alliance www.iemfa.org

Priartem, France www.priartem.fr

Le collectif des électrosensibles de France www.electrosensible.org

The Swedish Radiation Protection Foundation www.stralskyddsstiftelsen.se

The Swedish organisation for the Electrohypersensitive (FEB) www.eloverkanslig.org

The Enviromental Health Trust, USA www.ehtrust.org

EMfacts, Australia www.emfacts.com

Folkets Stralevern, Norway www.folkets-stralevern.no

EM Radiation Research Trust www.radiationresearch.org

Teslabel, Belgium www.teslabel.be

Beperk de Straling, Belgium www.beperkdestraling.org

Robin des Toits, France www.robindestoits.org

Verein für Elektrosensible und Mobilfunkgeschädigte e.V, Germany

Hypersensitives in Finland sahkoherkat.fi

Electromagnetic Safety Alliance, Inc., (Elizabeth Kelley) USA

StralingsArmVlaanderen, Belgium, StralingsArmVlaanderen.org

La coordination nationale des collectifs contre les antennes, France

The Association of electro hypersensitive in Norway (FELO) www.felo.no

Plataforma Estatal Contra la Contaminación Electromagnética (PECCEM), Spain www.peccem.org

EMF Safety Network, USA www.emfsafetynetwork.org

People Against Cell Towers at School, PACTS, USA

Powerwatch, UK www.powerwatch.org.uk

ElectroSensitivity UK (ES-UK) www.es-uk.info

AVAATE (Asociación Vallisoletana de Afectados por Antenas de Telecomunicaciones)
www.avaate.org/

Plattform Mobilfunk-Initiativen – PMI <http://www.plattform-mobilfunk-initiativen.at>

Stop UMTS www.stopumts.nl The Netherlands

Committee of Bürgerwelle e.V., Germany www.buergerwelle.de
Burgerwelle Schweiz, Switzerland
A.P.P.L.E. , Italy www.applelettrosmog.it
Associazione Italiana Elettrosensibili, Italy
Rete No Elettrosmog Italia www.retenoelettrosmogitalia.it
American Association For Cell Phone Safety, USA <http://americanassociationforcellphonesafety.org/>
Citizens For A Radiation Free Community, USA <http://citizensforaradiationfreecommunity.org/>
The Peoples Initiative, USA <http://thepeoplesinitiative.org/>
Stop Smart Grid, USA <http://stopsmartgrid.org/>
Patientenvereniging EHS Netherlands (www.patientenverenigingehs.nl)
Zones” BoerderijAnders, Netherlands www.boerderijanders.nl
Center for Safer Wireless, USA www.centerforsaferwireless.us
Bio-Electromagnetic Research Initiative (BEMRI), <http://www.bemri.org/>
Biosustainable Design, <http://biosustainabledesign.org/>
Cavisoc, UK www.cavisoc.org.uk
SSITA, UK www.ssita.org.uk
Interconnections, UK www.teamaroundthechild.com
California Brain Tumor Association, USA

Signatories December 16, 2014

Electrosensibles por el Derecho a la Salud, Spain <http://electrosensiblesderechosalud.org/>
Citizens for Safe Technology Society, British Columbia, Canada www.citizensforsafetechnology.org
No rad for you, Israel www.norad4u.com
EHS Foreningen for Elektro Hyper Sensitive, Denmark www.ehsf.dk

The opinion of NGOs on the preliminary draft on Radio Frequencies and health effects

The World Health Organisation (WHO)'s EMF Project has posted a draft report on Radio Frequencies and their health effects for public consultation. The report poses several problems, which the NGOs, signatories of this opinion and recognized stakeholders, would like to address. On the following pages we will develop the identified problems and propose solutions, some of which were presented at the seminar organized on June 5 and 6, 2013 by the WHO in Paris entitled "International stakeholder seminar on Radio Frequency Policies".

1. Lack of transparency of the selection of experts at the WHO EMF project

At the stakeholders' seminar, the present NGOs stressed the opacity surrounding the selection of experts and the methodology of the monograph. As a result Emilie van Deventer undertook a number of commitments aimed primarily at promoting transparency:

- A. Transmission of the list of experts selected for the first part of the expert report.
- B. Transmission of the bibliography supporting the first draft, and a list of the studies that had been excluded.
- C.D. Transmission of the first draft, and establishing a public consultation (in 2013) to nourish the second draft.
- E. Transmission of the procedure and selection criteria for the recruitment of members and observers of the task group, who will be responsible for the final monograph.
- F. Transmission of the questions and suggestions submitted in writing by the seminar participants, as well as the WHO's feedback.
- G. Publishing of the conclusions of the seminar, including the powerpoints and the proposals descending from the three work shops.
- H. Commitment to associate IEMFA and representatives of EHS on all reflections and all work on EHS according to the "*nothing about us without us*" principle

The NGOs have received no news from the WHO since the seminar. A letter dated the 11th November 2013 in which the NGO's reminded Mrs Van Deventer about these commitments also remains unanswered. Unfortunately, we are far from building transparency and confidence.

A. Transmission of the list of experts. In order to get access to the list of experts we had to get our hands on a slide show presented by Mrs. Van Deventer in Australia on November 11, 2014, at an ICNIRP conference. We will come back to the peculiar relationship between a UN agency and this controversial association further on.

B. Transmission of the bibliography and a list of excluded studies. The selected bibliography has a direct impact on the conclusions of an expert evaluation. The recent problem with the SCENHIR's report on epidemiology is a good illustration. Associations can be proactive and promote openness in this context. During the recent ANSES's expert evaluations in France, NGO's proposed numerous additions to the list of studies previously selected by experts.

The pre-report is put on-line for public consultation without a bibliography. References are certainly included in the text but each section must have it's own bibliography in order to make it possible to identify gaps.

This is not a good way of ensuring transparency.

The following two commitments, C.D Transmission of the pre-report and the opening of a public consultation, could be considered as fulfilled, although with a delay of more than one year. However, the preliminary report is presented in such a form - and we will come back to this later - that it gives no idea of the state of knowledge, the main task of the experts.

E. Transmission of the procedure and criteria for recruiting members and observers of the task group, who will be responsible for the monograph.

This crucial point remains in the shadows, which is surprising in a context where the independence and pluralism of experts are a main concern.

We ask that the WHO EMF project establishes an extensive and sustainable transparency policy in order to promote a better dialogue and build trust.

2. The failure to consult the civil society

The WHO conference in Paris addressed the stakeholders. However, the NGOs should have been excluded if a French agency, ANSES, would not have informed the members of its dialogue committee. The NGO presence proved to be completely blocked: NGO's were only invited to intervene at the workshop by answering a series of shattered questions.

In a press release titled, "Radio Frequency and health: does the WHO follow the orders from industry? ", five NGOs complained about the treatment of the social society. In response, Mrs Neira and Van Deventer, respectively responsible for Public health and environment and the EMF-Project, declared that the WHO committed to establish regular relations with the NGOs.

A commitment was also made to associate IEMFA, and representatives of the EHS patients' associations, whenever questions on Electrohypersensitivity are addressed, according to the principle "nothing about us without us". No contact or invitation has followed this commitment.

The commitments regarding the seminar minutes and the progress of the expert evaluation

were not fulfilled either.

The result of the workshops and the analysis of the written contributions during the stakeholder meeting have still not been disclosed. A recently published paper by Denis Zmirou only covers the viewpoints of government representatives.¹ The voice of civil society has been ignored, and the problems have been formulated by experts who are mainly well known for their predefined risk denial positions.

This mistreatment is contradictory to some WHO guidelines. The Agency has, as a matter of fact, begun to consider a reform of its governance. One objective of this reform is to "work more effectively with stakeholders, including non-governmental organizations."

We ask that NGO's working for a better electromagnetic environment and the preservation of life and health rights of all are represented and consulted in the WHO EMF project in general and the RF-EMF task group in particular.

3. The failure to demonstrate the independence of the experts

The assessment of the independence of an expert is primarily based on his declaration of interest (DOI). However the DOI's of the experts are not made public by the WHO. We are therefore confined to examine previous DOI published by other organizations. Apart from a few conflicts of direct vested interests, there are a large number of experts who have repeatedly received funding from the industry (Financial bias). Furthermore, there are within the group of experts what is recognized as the absence of intellectual independence (intellectual bias) or a partisan position declared in favor of the pro-industrial "no effects" viewpoint. (Bias officially recognized in the letter from IARC to A. Lerchl that rejected his application to be part of the Working group of the IARC RF monograph).

We also take note of the large number of experts with a present or former connection to ICNIRP both within the Core Group as well as among the additional experts. We know the uncompromising and predetermined positions of this organization, including the fervent defense of it's own obsolete standards, not adapted to the current chronic exposure, which are based on thermal paradigm (dismissal of non-thermal effects). However, it's recruitment methods and mode of operation are not known. ICNIRP is a non-transparent organization, with well kept secrets.

We ask that the WHO EMF-Project publish the DOI of it's experts and seeks to involve the most independent scientists as possible.

¹ "Risk Management Policies and Practices Regarding Radiofrequency Electromagnetic Fields: Results From a Survey Who" Radiation Protection Dosimetry (2014)

4. The evident lack of pluralism

The almost monolithic nature of the expert group is evident. It is a small group of experts who wrote the first draft, all previously related to each other.

"The steering committee first set up under the aegis of Emilie Van Deventer is composed of 6 members only. It is a sad mirror of the dependence of WHO on ICNIRP since 4 of its 6 members have links with this opaque organization that has continuously defended standards and the interests of the industry. Their work has also repeatedly been funded or co-funded by the industry. The plurality of opinions, needed on a subject that is highly controversial, is therefore not at all being assured.

**Radiofrequency and Health, is the WHO subject to industry orders?
The NGOs present at the WHO stakeholder conference in Paris in June 2013**

When it comes to the additional experts involved, of whom we have just recently obtained a list, the names seem to have been selected on the same basis of close cooperation. How can this narrow selection be justified in view of the ever growing pool of scientists nourishing the extensive bibliography published in this area? How does the Agency justify the complete absence of experts from countries that are known to have developed longstanding research on electromagnetic fields such as Russia and China? How to explain that the WHO has chosen not to bring experts with divergent positions? Why not let the states benefit from a real assessment of scientific knowledge reflecting the debate that is currently shaking the scientific community?

What may be the interest of the WHO to exclude the accumulating risks and signals of harm?

We ask that the WHO EMF Project opens it's panels to a significant number of scientists who have found harmful effects of RF EMF in order to allow an objective risk assessment based on all scientific interpretations.

We also ask that all conflicting findings are published.

5. Biased reporting of scientific results

The preliminary draft is presented as a juxtaposition of chapters without introduction, without conclusion, but more seriously without no indication of the methodology used neither of the evaluation of the quality of the articles nor of the evaluation of levels of evidence.

Consequently, it is impossible to know from the draft what criteria has been used to eliminate one study and include another, or why some studies are considered to be biased and others not. It is even more difficult to know what fate will be reserved for them when we arrive in assessing the level of evidence.

The main impression is that the articles that show harmful effects are systematically criticized and those who do not much less so.

But how will the risk be assessed when, as on male fertility for example, the vast majority of studies show negative effects? The fact that experts seem to have put a lot of energy to find

arguments against studies showing negative effects reflect a willingness to downplay the risks and the health hazards. This is worrying because when there is emerging risks, risk signals should, instead be taken into consideration.

It is not because the mechanisms between cause and effect are not fully understood that we must deny the existence of risks and fail to take measures to protect public health. The reports "Late lessons of early warnings" from the European Environment Agency provide strong arguments in support of this affirmation.

To illustrate our concerns about the existence of bias in the analysis of scientific articles presented in the draft report posted online, we investigated specifically the chapter dealing with epidemiological studies of cancer and exposure to RF radiation. See Appendix 1.

We ask that the WHO EMF-Project performs the evaluation of RF EMF taking The WHO EMF Project performs the assessment of RF-EMF taking into account the whole risk spectrum with one objective: precaution and health protection.

We ask that results of important recently published studies, Coureau 2014, for example, will be taken into account in the risk assessment.

6. The singular promiscuity between the WHO and ICNIRP, does it deviate the agency from its key missions: Public Health and Human Rights?

The presence of many expert with links to ICNIRP, particularly within the Core Group, gives us the opportunity to ask the officials of the EMF-Project why it keeps so close ties with this exclusive club, whose "advocates" are present in all major national and international experts groups, where they argue the "no effects" thesis against all and everything.

Why does the WHO repeatedly turn to an outside body with so low legitimacy, which has features of a front group defending outdated standards of military and industrial interest? Why cooperate with ICNIRP when defining health policies in such a controversial issue as EMF-RF?

It is due time that the WHO EMF project creates its own group of experts and broadens the recruitment of experts like IARC did in 2010-2011. This was a virtuous approach that deserves to be followed. The leaders of the EMF-Project seem to have decided otherwise. By giving the *de facto* control of the risk assessment to the ICNIRP sphere, the WHO is taking the risk of weakening its findings because it will be considered biased by a part the NGOs and a part of the scientific community.

Furthermore, how can it be explained that the individuals who set the standards are also allowed to evaluate them, and by doing so becoming both judges and parties? Is this not a major conflict of interest that should be of interest to all?

These experts are also present in most national and international expert groups since too many years, imposing their defensive positions favouring industrial interests. It is time that the WHO member nations benefit from evaluations by experts that are free from ICNIRP's ideological straitjacket.

Only a few years ago the WHO's departments were infiltrated by persons with close ties to the tobacco industry working for the benefit of the industry. If WHO does not want to be in the same delicate situation regarding the EMF-RF issue it needs to distance itself from ICNIRP and favour the selection of independent experts.

We ask that the WHO EMF project separates from ICNIRP in order to broaden its horizons and move towards an improved concern for Public Health and a true defence of the rights and interests of citizens.