Updated Memorandum on WiFi Research

On the 12th October 2007, the HPA announced a new "systematic programme of research" into wireless local area networks. We welcome the extra money for research in this area. However, we believe that this programme needs a different focus in order for it to result in valuable new information for the required reevaluation of the ICNIRP Guidelines. As the project is presently planned to ignore reported health effects, we question if this is appropriate expenditure by a public body responsible principally for the protection of public health.

We believe that, as announced, the research programme would be a misuse of almost a third of a million pounds of public money, addressing a question that has already been adequately answered by themselves and others. According to the press statement the programme is to:

"... measure exposures to radio signals from wireless computer networks. The results will be compared with established international exposure guidelines and also with exposures from other commonly used sources of radio signals, including mobile phones."

www.hpa.org.uk/hpa/news/articles/press_releases/2007/071012_wifi.htm

The international exposure guidelines to which HPA refer are the 1998 ICNIRP guidelines. These guidelines are set at levels designed only to protect against exposure-induced thermal changes in tissue and biological processes, and to protect against direct peripheral nerve stimulation and electric shock.

Public microwave exposures due to emissions in a typical wireless local area network are orders of magnitude lower than the ICNIRP guidelines. There is already enough research documenting the predicted and measured exposures from these systems, some of which are listed below in Appendix A. As far as we are aware, these are not in any dispute.

A senior HPA manager recently stated: "The (existing) work appears as an excellent experimental investigation of both SARs produced in flat phantoms and field strengths around various items of radio equipment, including several WiFi access points and PC cards." ... "We will also be considering the temporal patterns of transmitted data during the course of school lessons and thus the time guaraged output powers that occur

the course of school lessons and thus the time-averaged output powers that occur from WiFi equipment in practice."

(in an email from Dr Jill Meara, Asst Director (Public Health), HPA CRCE, to Alasdair Philips, 28-Nov-07)

Although we have yet to receive a reply to our Memorandum, in a letter of 12 November 2007 to Dr Caroline Lucas (MEP), Dr Roger Cox (Director, HPA Centre for Radiation, Chemical and Environmental Health) states that the review will include a review of potential health effects with reference to ICNIRP guidelines. These state that they are based on:

"... short-term, immediate health effects such as stimulation of peripheral nerves and muscles, shocks and burns caused by touching conducting objects, and elevated tissue temperatures resulting from absorption of energy during exposure to EMF" ICNIRP Guidelines, April 1998, v.74-4, p.496 The ICNIRP Guidelines specifically exclude any potential long-term effects such as those that we are concerned about. So, it is not surprising that Professor Pat Troop, Chief Executive of the HPA, was able to confidently state about this new research:

"We have good scientific reasons to expect the results to be re-assuring and we will publish our findings." Professor Pat Troop, CEO, HPA www.hpa.org.uk/hpa/news/articles/press_releases/2007/071012_wifi.htm

That re-assurance is already pre-determined by the study design limitations. It is clear from the above quotations that the study currently is only to examine time-averaged SAR exposures. That has virtually no meaningful relevance for the consideration of the various non-thermal signal characteristics (i.e. informational rather than heating effects) that are thought, by leading concerned scientists working in the field of bio-electromagnetics, to be most likely to be causing the asthenic problems being reported. At previous HPA EMF DG meetings we have discussed the real public concerns about the effects on their health from exposure to signals from WiFi and mobile phone base stations. This announced "programme of research", which is not to collect any reported health effects, does not in any way address our concerns and its findings will not re-assure the concerned scientists and general public.

Since the ICNIRP 1998 Guidelines were produced a considerable number of studies have been published pointing to health effects far below the ICNIRP levels (see below in Appendix B). Many of these effects are found at signal levels very similar to, and in some cases significantly below, typical exposures from a nearby wireless network.

The most commonly reported adverse effects to low-level electromagnetic signals are headaches, concentration difficulties, learning and memory problems, chronic fatigue, depression, and behavioural problems. These symptoms are present in many ADHD cases. Since 1997 there has been a four-fold rise in children diagnosed with ADHD - indeed the National Institute for Clinical Excellence now estimates that as many as 5% of children have this problem. The cause of this rise is, so far, unknown.

In the light of Dr Havas' Canadian schools work on "dirty electricity" and improvements in children diagnosed with ADHD (see Appendix B), it is possible that background microwave exposure plays a role in this rise and we believe that it should be among the issues examined. It is important also to control for any placebo effect.

The various reports of adverse effects on well-being suggest that the adverse symptoms start to show in more sensitive people exposed to background peak signal levels above about 0.05 volts per metre. Typical signal levels in schools with WiFi are between 2 and 40 times higher than this. For further information, please see Appendix A.

We now urgently need ecological studies, monitoring the performance and well-being of children who are now exposed to these signals. Their health and performance details should be compared with those from relatively unexposed children and the data also examined to see if there are any temporal trends. As there are still some schools without WiFi, this may be the last opportunity to do some valuable work while we still have a chance to find relatively unexposed control children - although their home and mobile phone exposure also needs to be recorded. Much of the work could be done using questionnaires. In June 2000 the UK Government advised people to consider preventing the 'beam of greatest intensity' from a base station's antenna from falling on school premises. The levels inside classrooms from internal WiFi / wLAN equipment will almost always significantly exceed the classroom levels from any nearby base station.

The 1998 ICNIRP Guidelines are overdue for revision in the light of evidence published since. In order to meaningfully re-assess the situation, information about the health, well-being and performance of users needs to be gathered.

We call on the HPA to fundamentally change the announced programme of work so that it primarily collects health and performance data on school pupil WiFi users.

Our initial suggestions for study include:

(1) To study secondary school children in the 12-15 year-old age-range as we have reports that this group is more affected than primary school children. This may be due to their longer exposure to environmental agents.

(2) School records should be used for health, behaviour and performance and some specific mental ability tests carried out.

(3) Schools with and without WiFi could be compared and also one or two schools with WiFi should also be equipped with wired networks and work 'half a term WiFi-on' and 'half a term WiFi-off' with suitable performance testing and well-being score at the end of each period for a couple of years.

(4) It would be important to also record, for these children, mobile-phone usage and home exposure to basestation, DECT and WiFi signals.

Some of this could be integrated with the forthcoming MTHR funded childhood illness research.

This programme of work could then result in some valuable information to feed into the necessary re-evaluation of the ICNIRP Guidelines.

This revised Memorandum has been signed by eight Members of the HPA-RPD EMF Discussion Group who are prepared to help with the study over-sight and planning.

http://www.hpa.org.uk/radiation/understand/radiation_topics/emf/emfdg/index.htm

From the Minutes of the HPA/RPD EMF DG meeting of 9th September 2007:

"Members were reminded of the Terms of Reference (ToR) of the EMF DG which are to:

To provide a forum for considering possible health concerns related to exposure to electromagnetic fields (EMFs) and to provide an input to the development of HPA advice.

The Chairman considered that this was an important remit which enabled the Members' concerns to be raised and taken forward in a structured way."

Ref [1] http://www.hpa.org.uk/hpa/news/articles/press_releases/2007/071012_wifi.htm

Appendix A - Exposure levels

The ICNIRP maximum public exposure Guidelines for the 2.4 GHz main current WiFi band are: 61 volts per metre (V/m) averaged over any 6 mins >1 952 V/m is allowed in short peaks 10 W/m^2 averaged over any 6 minute period $10 000 \text{ W/m}^2$ averaged power of any short pulse

Signal levels from WiFi and similar equipment have been calculated and measured by industry during EMC compliance testing for over 10 years. The peak signals are up to about 6 volts per metre (V/m) and environmental signals that people are exposed to in rooms with WLAN hubs typically vary from about 0.1 to 3 V/m. Nobody seems to dispute this. The levels are lower in areas in the school without the Access Points and most wireless PCs can work down to reception levels well below 0.001 V/m, though the actual laptop PC transmitter will still be transmitting a signal of about 1 V/m or more to the user.

What is under dispute is whether signals as low as these can have effects on peoples' well-being.

The peak signal levels users are exposed to are generally in the range 0.2 to 2 V/m, with very short duty-cycles, resulting in low average power levels and tiny SAR absorbed power values. It is possible to have higher signals if sitting very close to the equipment, especially the Wireless Access Point.

For example, most WiFi units emit a background ~10 Hz beacon signal (a brain-wave frequency) pulsing at full power in 20 to 50 microsecond bursts even when not transferring files. In our opinion, it is quite inappropriate to time-average this by a reduction factor of 2 000 to 5 000-fold (as, for example, this HPA study will do and Foster (2007) did). If you take the peak SARs from the short pulse itself, then ICNIRP allows a 1 000-fold increase in power during this pulse (see top of this page), so this still does not address the relevant non-thermal issues.

The HPA-RPD have assessed these and found average power density levels of 220 microwatts per square metre (μ W/m²) about 0.6 metres from a laptop PC and 330 μ W/m² at 2 metres from a wireless Access Point. These translate into average signal strength levels of 0.3 and 0.4 V/m respectively, with peak levels probably in the order of 0.5 to 2.5 V/m. (December 2003, carried out by Adam Lowe, HPA-RPD, Leeds.)

In June 2005, SAEFL, the Swiss Agency for Environment, Forests and Landscape, published a report "Electrosmog in the Environment". This states signal strengths at one metre from both wireless PCs and normal strength Access Points to be in the range 0.7 to 2.8 V/m. These are in good agreement with the above figures. The report DIV 5801-E is downloadable from: www.buwalshop.ch

An authoritative report was given by Neils Kuster, Foundation for Research on Information Technologies in Society (ITIS), Zurich, to a WHO Workshop meeting on "Base stations & wireless networks - Exposures & Health Consequences" in July 2005. ETH found that the typical peak signal strength at 1 m was about 1 V/m, rising to 2 V/m at a distance of 0.5 metres. This is in agreement with the above figures. The presentation is available at http://www.who.int/peh-emf/meetings/archive/bsw_kuster.pdf

The UK Radiocommunications Agency commissioned a useful report (AY-4434, 2.4 GHz Monitoring Exercise) carried out by Mass Consultants Ltd in 2003. This looks in some considerable detail at microwave signals in the 2.4 GHz band and is available on the internet. www.ofcom.org.uk/static/archive/ra/topics/research/topics/other/2-4ghzbandmonitoring.pdf

The BBC1 Panorama programme asked Powerwatch to make measurements for a programme on WiFi in schools, broadcast in May 2007. Values of between 0.2 and 1.5 V/m were measured 0.5 metres in front of a laptop downloading a file over the WiFi / wLAN wireless link. This is in good agreement with the above figures. The graphs below can be found at: www.powerwatch.org.uk/news/20070529 panorama extra.asp



The rationale behind these measurements was questioned by some people and a formal complaint made to the BBC about the Panorama programme. The BBC Editorial Complaints Unit has looked into this and has backed the programme's radiation experiment, saying "*The programme made clear that its measurements of wi-fi and mobile phone mast radiation were taken at the points where schoolchildren were likely to be exposed to the respective signals, thus avoiding the false impression that the level of radiation from wi-fi was higher at source.*" http://www.bbc.co.uk/complaints/news/2007/11/30/51156.shtml

The consistency of the measurements (typically in the range 0.1 to 2 V/m peak signal strength) made by many competent people using good quality equipment, that are orders of magnitude below the ICNIRP compliance levels, means that a new programme of work concentrating on making further measurements is not needed at present.

The error budgets on these measurements mean that all present-day WiFi signals will be ICNIRP compliant. That does not in any way address, or even help to address, the low-level exposure adverse health questions that are currently being asked.

Appendix B - Some Relevant References (post ICNIRP 1998)

This is not intended to be a comprehensive listing

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