



Call for Transparent, Impartial and Pluralist Expert Assessment on health risks of non-ionizing electromagnetic fields (EMF)

Strasbourg, November 12, 2011

TO: Commissioner John DALLI, Health and Consumer Policy

CC: Commissioner Janez Potočnik, Environment

Commissioner Máire Geoghegan-Quinn, Research, Innovation and Science.

In the perspective of DG Sanco's scientific conference on Electromagnetic fields and Public Health, Nov 16-18, 2011, and IARC's classification of radiofrequency (RF) EMF as "Possibly Carcinogen" we, NGOs, MEPs and other public interest stakeholders state the following:

- We are writing to express our concerns over the narrow range of speakers and agenda items for the November 16-18 EU Commission conference on EMF, and over the lack of transparency and pluralism in the evaluation of evidence by SCENIHR and other EU risk assessment committees.
- We are concerned about the lack of transparency, impartiality and pluralism in the selection of:
 - o the members of the steering committee
 - o the experts represented at the conference
 - o the agenda items
- There is solid evidence, from their published work for example, that most speakers, as well as most members of the steering committee which appointed them, share the same opinion on EMF health risks and support the highly controversial "ICNIRP interpretation" of the evidence on the biological effects of non-ionizing radiation. This viewpoint is only one of several scientific judgments in the well-known controversy of EMF health risks. The November group is hence not intellectually impartial according to the Commission's own standards as set out on its successful submission on this issue to the WTO Appeal Court on the beef hormones case.
- **We believe there is an effective risk that an imbalanced panel would ignore or play down the full range of plausible scientific and empirical evidence of health risks, including IARC's recent classification of RF fields as "possibly carcinogen". This would misguide the EU Commission, hinder the needed review of the Commission's recommendations, and postpone the implementation of cost-efficient preventive measures.**¹

¹ "Late lessons from early warnings: the precautionary principle 1896–2000", European Environmental Agency, 2002. Download the report [here](#).

- We agree when the Commission, on its Communication on the Precautionary Principle (2000), recommends that “the degree of scientific uncertainty should be presented correctly”, and states that the precautionary principle is applicable before a risk has been “determined with sufficient certainty.”
- We fear that the reputation and credibility of DG Sanco will suffer if the present unintentional unevenness is not adjusted. We are confident that you, Commissioner Dalli, agree that pluralism is necessary for rational decision-making, and that you are as attached to transparency, impartiality and democracy as we, the Parliamentary Assembly of the Council of Europe (PACE) and WHO’s International Agency for Research on Cancer (IARC) are.²
- This is not an isolated case. Many EU risk assessment committee reports, despite some advice on handling uncertainties from EFSA Scientific Committee, do not provide a fully transparent, traceable account of the process for evaluating evidence and drawing conclusions. In some cases summaries of reports do not correctly reflect the evidence from underlying chapters something for which IPCC has also been criticized. We have noted the recent critique of IPCC by the global scientific authority, the Inter-Academy Council, for failing to be sufficiently transparent about scientific uncertainties and for failing to provide a “traceable account” of the process of evidence evaluation and concluding judgments and their justifications.
- Such advice has since been formally endorsed by the IPCC in its revised guidance to lead authors on handling uncertainty in the next IPPC report on climate change.

We therefore ask you to:

- 1. Assure that current and upcoming expert appointment processes are transparent and managed by a balanced steering committee.**
- 2. Add time for a presentation of alternative scientific interpretations to the November conference.**
- 3. Consider the citizens’ view-points and experience as a complement to expert assessment. Consequently invite representatives from the International EMF Alliance (IEMFA) and other relevant public interest groups and assemblies to the upcoming conference and other EMF-related events.**
- 4. Establish and publish a policy for risk assessment committees assuring pluralism and transparency and avoiding conflicts of interest and other bias. This guidance could be similar to that produced by IPCC.**
- 5. Ensure high standard, pluralism and impartiality when selecting experts for particular reports or issues where intellectual or other bias is plausible.**
- 6. Organise a conference on EMF health risks where all main scientific factions are represented, including those who conclude there are risks and a need for prevention.**

We thank you for your attention, and for considering our request.

Respectfully Yours,

² IARC has stated that an IARC Monograph demands “*independence from all commercial interests and from advocates that might be perceived as advancing conceived position*”. This policy was welcomed by civil society representatives and made the participation of several controversial scientists impossible (e.g. Prof Ahlbom).

International EMF Alliance ([IEMFA](#))

Sissel Halmøy, Folkets Strålevern, Norway, Chair

Alex Swinkels, Netherlands, Board member

Eileen O'Connor, EM Radiation Research Trust, UK, Board member

Kerstin Stenberg, Priartem, France, Board member

IEMFA represents the following [organisations](#):

- Alliance for Irish Radiation Protection Ireland
- American Association for Cell Phone Safety USA
- ASANACEM/EEKNE Spain
- Associació Oikos Ambiental Spain
- Association for Environmental and Chronic exposure Injury Italy
- Association for Electro Hypersensitive Norway
- Association for Electrosensitive in Finland Finland
- Association for the Protection of Health and the Environment Chile
- Associazione Italiana Elettrosensibili Italy
- AVAATE Spain
- Bio Electromagnetic Research Initiative United Kingdom
- Cell Tower Dangers United States
- Center for Safer Wireless United States
- Citizens for Safe Technology Canada
- Citizens' Radiation Protection Norway
- California Brain Tumor Association United States
- Defense Association of Health and Environment Chile
- Ecologists in Action (Ecologistas en Acción) Spain
- EHS Association of Electrosensitives Denmark
- EKEUKO-COVACE Spain
- Elektrosmog-Info Switzerland
- Elettrosmog Volturino-onlus Italy
- Electric Sense United States
- Electrical Pollution Solutions United States
- Electrosensitive Society United Kingdom
- Electromagnetic Radiation Research Foundation South Africa
- Electromagnetic Safety Alliance United States
- Electrohypersensitivity Foundation (Stichting EHS) Netherlands
- Electromagnetic Fields Protection Alliance Malaysia
- ElectromagneticHealth.org United States
- EMFacts Consultancy Australia
- EMF Refugee United States
- EMR Australia Australia
- EM Radiation Research Trust United Kingdom
- EMR Policy Institute United States
- Environmental Health Trust United States
- ElectroSensitive Association (FEB) Sweden
- Escuela sin WIFI Spain
- Green Warriors of Norway Norway
- Health Defense Organization Spain
- IGEF The International Society for electromagnetic research Germany
- Kitakamakurakeitaing Japan
- KompetenzInitiative Germany
- La Fundación Vivo Sano Spain
- Limit the Radiation (Beperk de Straling) Belgium
- Mast Action UK United Kingdom
- Mast-Victims United Kingdom
- Mast Sanity United Kingdom
- NEXT-up Organisation France
- National Platform on Radiation Risks Netherlands
- Our Children's Future (Vore Børns Fremtid) Denmark
- Pandora Foundation Germany
- PRIARTÉM France
- Powerwatch United Kingdom
- Radiation Education Canada

Cont. IEMFA supporting organisations

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| • Rete Elettrosmog free Italia | Italy |
| • Robin des Toits | France |
| • StopUMTS | Netherlands |
| • StralingsArmVlaanderen | Belgium |
| • Teslabel | Belgium |
| • The People's Initiative Foundation | United States |
| • VGM Verein für Gesundheitsverträglichen Mobilfunk | Lichtenstein |
| • WaveBreaker (Vågbrytaren) | Sweden |
| • WEEP (Wireless Electrical and Electromagnetic Pollution) | Canada |
| • WiFi in schools | United Kingdom |
| • Wirelesswatchblog | United States |
| • WiredChild | United Kingdom |

International and pan-European NGOs

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| • Health and Environment Alliance, HEAL, | (70 member organisations) |
| • Women in Europe for a Common Future, WECF | (100 member organisations) |
| • Pesticide Action Network-Europe, PAN-Europe | (31 member organisations) |

Other Non Governmental Organisations and Coalitions

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| • Réseau Environnement Santé (21 associations) | France |
| • Bund für Umwelt und Naturschutz Deutschland e.V. (BUND)/ Friends of the Earth (480 000 members) | Germany |
| • The Wireless Radiation Safety Council | Canada |
| • The Coalition to Stop Smart Meters, | Canada |
| • R.I.S.K. (Rebutting Industry Science with Knowledge) | Belgium |
| • Swedish Radiation Protection Foundation | Sweden |
| • Initiativ Liewensufank | Luxembourg |
| • British Society for Ecological Medicine | United Kingdom |
| • BUND, Naturschutz in Bayern | Germany |
| • AKUT | Luxemburg |
| • Irish Doctors Environmental Association (IDEA) | Ireland |
| • Irish Electromagnetic Radiation Victims Network (IERVN) | Ireland |
| • Diagnose-Funk e.V. | Germany |
| • Diagnose-Funk e.V. | Switzerland |
| • The GalileO Project | USA |
| • C.H.A.S.M. (Coalition for Health / Against Smart Meters) | USA |
| • PACTS, People Against Cell Towers at Schools | USA |
| • A.P.P.L.E. Associazione Per la Prevenzione e Lotta all'Elettrosmog | Italy |
| • Ezpitsua, Basque Country | Spain |
| • Ekologistak Martxan, Basque Country | Spain |
| • h.e.s.e project | Germany |
| • Elektrosmognews | Germany |
| • ASQUIFYDE | Spain |
| • PMI - Plattform Mobilfunk-Initiativen | Austria |
| • The Santa Fe Alliance for Public Health & Safety | USA |
| • Doctors W.A.R.N | USA |
| • Advisory Board Doctors for Safer Schools | Canada |

Members of the European Parliament (MEPs)

- | | | |
|--------------------|--------|---------|
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| • Kriton ARSENIS | S&D | Greece |
| • Frédérique RIES | ALDE | Belgium |
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Mona Nilsson, Journalist, Environmental Economist	Sweden
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B. Blake Levitt, author	USA

- Enclosures:**
1. IEMFA's "General opinion on risk assessment".
 2. « European Parliament resolution of 2 April 2009 on health concerns associated with electromagnetic fields » (2008/2211(INI)). [The Ries-resolution](#).
 3. The Parliamentary Assembly of the Council of Europe's resolution on « The potential dangers of electromagnetic fields and their effect on the environment ». [Resolution 1815](#).
 4. "Health risks from mobile phone radiation – why the experts disagree", European Environment Agency, October 12, 2011. [EEA statement](#).

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