

Exhibit A

Tab A

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

MICHELE HRIADIL and
FRANCIS HRIADIL,

Complainant,

vs.

DUQUESNE LIGHT COMPANY,

Respondent.

No: C-2016-2571726

**RESPONSE TO RESPONDENT'S
FIRST SET OF DISCOVERY
REQUESTS DIRECTED TO
COMPLAINANTS**

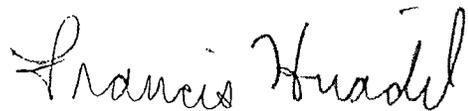
Filed by Michele and Francis Hriadil

hriadil@attglobal.net
(412) 779-3314
331 Shady Ridge Drive
Monroeville, PA 15146

**RESPONSE TO RESPONDENT'S
FIRST SET OF DISCOVERY REQUESTS DIRECTED TO COMPLAINANTS**

**THIS IS COMPLAINANTS RESPONSE TO RESPONDENT'S FIRST SET OF DISCOVERY
REQUESTS.**

**A COPY OF THIS MATERIAL HAS BEEN SENT TO ALJ JEFFREY A WATSON, AND A
CERTIFICATE OF SERVICE HAS BEEN FILED WITH THE COMMISSION'S SECRETARY, PER
JUDGE WATSON'S OCTOBER 3, 2017 INTERIM ORDER.**



Francis Hriadil
October 26, 2017

11. State the full name, address, and telephone number of each person who You expect to call to testify as an expert witness at any hearing of this matter and, for each expert witness, state:

- a. The subject matter on which the expert is expected to testify;
- b. The substance of the facts and opinions to which the expert is expected to testify; and
- c. A summary of the grounds for each expert opinion.

ANSWER:

a., b., c. I have been in direct contact with a number of experts, particularly:

- David O Carpenter, MD
Director, Institute for Health and the Environment, University at Albany
Area of Expertise - Primarily, Health Effects and Risks

Note: Dr. Carpenter has written a letter to the PA PUC and ALJ Watson on our behalf, which is included in this Discovery response as ~~Exhibit B-6~~.
- Ronald M Powell, PHD
Applied Physics, Harvard University
Retired, Executive Office of the President, the NSF, and the NIST
Area of Expertise - Primarily, Physics and Biomedical Research
- Andrew A Marino,
PHD., Biophysics, Syracuse University
JD, Law, Syracuse University
Area of Expertise - Primarily, Health Effects and Risks
- Samuel P Milham, MD, MPH
Retired, Section Head, Chronic Disease Epidemiologist
Washington State Department of Health
Area of Expertise - Primarily, Health Effects and Risks

The Hearing dates are unclear at this date. A request has been submitted to the PA PUC to reschedule the Hearing for March 2018. People's schedules need to be considered in light of the Hearing dates, therefore the availability of any expert witness cannot be stated at this time.

As soon as this can be determined with certainty, and a decision can be made, the Respondent will be informed of the planned appearance of any expert witness, and their specific details.

In any event, documents, expert testimony, and reports by these experts have already been and will be submitted as Exhibits.

12. Produce the report of any expert You intend to call to testify on Your behalf at trial.

ANSWER:

A number of reports and documents from these experts have already been submitted with our previous filings. Some additional documents from these experts have been supplied with this response to Respondent's First Discovery Request.

13. Produce the curriculum vitae of any expert that You intend to call to testify on your behalf at trial.

ANSWER:

The availability any one of these experts, or any potential other experts, is not known for a certainty at this time.

In any case, their backgrounds and/or curriculum vitae have been included here, as a proactive measure.

- **Exhibit CV-1: David O Carpenter, MD**

A Background / Curriculum Vitae, proactively, has been provided.

Dr. Carpenter has written a letter to the PA PUC and ALJ Watson on our behalf, which is included in this Discovery response as **Exhibit E-6**.

- **Exhibit CV-2: Ronald M Powell, PHD (retired)**

A Background / Curriculum Vitae, proactively, has been provided.

- **Exhibit CV-3: Andrew A Marino, MD, JD**

A Background / Curriculum Vitae, proactively, has been provided.

- **Exhibit CV-4: Samuel P Milham, MD, MPH (retired)**

Author of the book, "Dirty Electricity: Electrification and the Diseases of Civilization" [<https://www.amazon.com/Dirty-Electricity-Electrification-Diseases-Civilization/dp/193890818X>]

A Background / Curriculum Vitae, proactively, has been provided.

Exhibit B

Tab B

22 October 2017

Pennsylvania Public Utilities Commission
400 North Street
Harrisburg, Pennsylvania 17120

Judge Jeffrey Watson
PA PUC Pittsburgh Administrative Law Judge Office
310 Fifth Ave, Suite 220
Piatt Place
Pittsburgh, PA 1222

Re: Case C-2016-2571726

Dear Sirs/Madams:

This is concerning potential adverse health effects associated with exposure to radiofrequency (RF) radiation, specifically that from electronic utility meters. I am a public health physician and former Dean of the School of Public Health at the University at Albany. I have been involved in review and analysis of studies on electromagnetic fields, including radiofrequency fields, for many years. I served as the Executive Secretary to the New York State Powerlines Project in the 1980s, and have published several reviews on the subject. In addition I was invited to present to the recent President's Cancer Panel on the subject of powerline and radiofrequency fields and cancer, and the publication that came from that Panel is attached. I have edited two books on effects of EMFs, including RF radiation. I served as the co-editor of the Bioinitiative Report (www.bioinitiative.org), a comprehensive review of the literature on this subject. The public health chapter from this report was subsequently published in a peer reviewed journal, which is attached. This is a subject which I know well, and one on which I take a public health approach that has as a fundamental principle the need to protect against risk of disease even when one does not have all the information that would be desirable.

There is clear and strong evidence that intensive use of cell phones increases the risk of brain cancer, tumors of the auditory nerve and cancer of the parotid gland, the salivary gland in the cheek by the ear. The evidence for this conclusion is detailed in many publications in the peer-reviewed scientific literature. Most recently the National Toxicology Program reported that chronic exposure of rats to cell phone radiation resulted in the development of the same kinds of brain cancer and auditory nerve tumors (although in this case in the heart not the ear) that are seen in human using cell phones excessively. Electronic meters use similar radiofrequency radiation, in some cases exposing the whole body to levels of radiofrequency radiation similar to cell phones. The difference between a cell phone and an electronic meter environment is that while the cell phone is used only intermittently a smart meter environment is continuous. There is also strong evidence that leukemia rates are increased among people living near to powerful AM radio transmission towers. Because WiFi, radio transmission towers and electronic meters all generate similar RF radiation, my conclusion is that if the whole body is exposed, leukemia is

the major cancer of concern, while if only the head is exposed as in using a cell phone, one sees increased risk of local cancers, such as brain cancer. There are a variety of other health effects reported as a result of exposure to RF radiation, but in my judgment the increased risk of cancer is both the best documented and the disease of greatest concern.

There have been few careful studies specifically of the health effects of electronic meters to my knowledge, in great part because they haven't been around very long. But they utilize the same type of RF radiation that is used in cell phones. It should be noted that the World Health Organization has declared radiofrequency radiation to be a possible human carcinogen. While it is true that the nature of exposure to RF from electronic meters is not significantly different from that coming from other wireless devices, what is important is cumulative, aggregate exposure. My position is that we should practice "prudent avoidance", which is to say reduce unnecessary exposure to the degree possible until the magnitude of risk is fully understood.

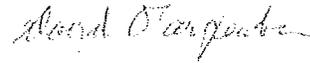
My specific concerns about electronic meters are as follows:

1. The benefit of the electronic meters is entirely to the utilities, and is economic in nature. If they install these meters they can fire those individuals who at present are employed to go around reading meters. Thus this is a job-killing proposal, and will increase unemployment which is already too high.
2. When an electronic meter is installed residents have no choice in the matter or ability to avoid exposure. But every individual has the option to use or not use other personal wireless devices. There is a major difference between an exposure which an individual chooses to accept and one that is forced on individuals who can do nothing about it.
3. Most electronic meters transmit signals to the utility for relatively short periods of time, but generate radiofrequency pulses at frequent intervals all day and night. Thus the device continuously generates RF radiation that will expose anyone nearby 24/7.
4. The evidence for adverse effects of radiofrequency radiation is currently strong and grows stronger with each new study. Analog meters with shielded cable do not increase exposure.
5. The installation of these meters also pose security and privacy concerns as they will allow the utility to monitor individual appliance usage and can be hacked.

As a public health physician with specific expertise in the human effects of radiofrequency radiation, I urge you to require Duquesne Light Company to install analog meters where residents request them. At the very least individuals concerned about their health and the health of their families should be allowed to choose an analog meter. Analog meters have withstood the test of time for safety and are not a source of RF radiation. Installation of electronic meters will adversely affect the health of Pennsylvania residents and will ultimately invite legal action arising from the development of diseases known to be associated with exposure to RF radiation.

Thank you for the opportunity to comment on this important public health concern, and on the general issue of electronic meters. The use of electronic utility meters is unwise from both a public health point of view, which is where my expertise lies, but and also from a purely short and long-term economic point of view.

Yours sincerely,

A handwritten signature in cursive script that reads "David O. Carpenter".

David O. Carpenter, M.D.

Director

Institute for Health and the Environment

University at Albany



Planetary Association for Clean Energy, Inc.

100 Bronson Avenue, Suite 1001
OTTAWA, Ontario K1R 6G8, Canada
(613) 236-6265 / fax: (613) 235-5876
paceincnet@gmail.com / www.pacenet.homestead.com

An international collaborative network of advanced scientific thinking

NGO in Special Consultative status with the Economic and Social Council of the **United Nations** (ECOSOC)

November 30, 2018

For the attention of

Pennsylvania Public Utility Commission

400 North Street
Harrisburg, Pennsylvania 17120
The United States of America

and

Judge Jeffrey Watson

PA PUC Pittsburgh Administrative Law Judge Office

301 Fifth Avenue, Suite 220 / Piatt Place
Pittsburgh, Pennsylvania 15222
The United States of America

Regarding:

Francis Hriadil and Michele Hriadil

Docket # **C-2016-2571726**

(Formal complaint with the **PA PUC**, filed 10/1/2016

with regards to **Duquesne Light Company (DLC)**

installation of an **Itron/Centron Openway SK9AMI7** Smart Meter
in a Smart Mesh at 331 Shady Ridge Drive, Monroeville, Pennsylvania 15146,
The United States of America

As President of the **Planetary Association for Clean Energy (PACE)**, I wish to bring to your considerations stemming from several decades of independent scientific research and of multi-disciplinary peer review into electromagnetic and other issues that appertain to this Docket.

Our organization was founded by **Senator Chesley W. Carter**, while Chair of the Canadian **Senate's Standing Committee on Health, Welfare and Science** as well as member of the **Senate Special Committee on Science Policy**. He and his colleagues considered electromagnetic field issues to be among the top 3 scientific and technological priority issues of national concern. They arranged for a comprehensive study by the **National Research Council** and **Queens University** on the biological effects of electromagnetic fields, especially microwaves, which were published in official reports

between 1971 and 1972. Like research was done by **Medical Research Council (MRC)** -replaced since 2000 by **Canadian Institutes of Health Research (CIHR)**, and by other facilities.

Results are confirmed and elaborated by **US National Toxicology Program /NTP** (per 2004 **US FDA** request).

From the mid-1980s, due to governmental high-level policy concerns, PACE organized specialists' conclaves, at pioneer international conferences, on electromagnetic issues involving scientists, engineers, MDs and agencies. It was the first to facilitate the in-depth examination of medical issues associated with environmental hypersensitivity (EHS) and to help develop realistic exposure guidelines and standards, accepted since in many circles, including the **European Union**. These initiatives also led to now-mainstream electromagnetic measuring instruments, protocols, procedures for monitoring & tracing technological errors. PACE worked with **Canada Mortgage and Housing Corporation (CMHC)** to examine electromagnetic fields in Canadian housing, including those with advanced SMART systems. PACE conducts surveys premises with advanced metering infrastructure (smart meters) since **Hydro Québec's** experimental run, years before their authorization by the provincial government's regulatory board (**Régie de l'énergie**) in 2011.

We have provided, and continue to do so, expert testimony with regards to electromagnetic field issues, including those associated with advanced metering infrastructure. This includes expert reports and opinions on relevant documents and the introduction of evidence, even "hearsay", as well as testimony via video link.

In our expert opinion, and based on monitoring that we have made with occupants with smart meters and their premises for several years, as well as assessment of the related and relevant medical evidence of some of these individuals, the complaint Docket is sufficiently credible, with the potential for proof of health concern effects, to reserve considerable risk of adverse affectation from the meter being deployed. Such risk has been observed to be cumulative to numerous factors associated with the premises of the occupants, and their surroundings. The adverse affectations from smart meters, such as the ones at issue in this Docket of Francis and Michele, have been noted, in our surveys, to accrue, furthermore, with those who are more vulnerable to injurious affectation due to age – infants, pregnancy and seniority (both Francis and Michele are elderly), chronic health (Francis has chronic conditions), and duration of occupancy. There are also other known risks of great concern: safety and fire hazards, including explosions, economic / insurance coverage such as standard exclusion from liability coverage for claims.

We are in a position to introduce at least two relevant documents in our file as well as some reports, if admissible. As required we may submit supporting information for this matter.

We are disposed to participate in the proceedings in a mutually acceptable manner.



Dr. Andrew Michrowski
President

Andrew Michrowski, Phd
Curriculum Vitae

- Dr. Andrew Michrowski studied at the faculties of Architecture and Urbanism at the **Politecnico di Milano**, Milan, Italy,
where he received his *Dott. Arch.* Degree with honours.
- He
 - has served with the **Department of Indian and Northern Affairs**
as Chief Planner;
 - followed by senior positions with the **Secretary of State of Canada**
as forecaster, analyst and program evaluator, including EMF issues;
 - is currently the President of the **Planetary Association for Clean Energy** (PACE),
founded by Senator Chesley W. Carter, while Chair of the Canadian Senate's
Standing Committee on Health, Welfare and Science, as well as member of the
Senate Special Committee on Science Policy. He and his colleagues considered
electromagnetic field issues to be among the top 3 scientific and technological
priority issues of national concern.

**NGO in Special Consultative status with the Economic and Social Council
of the United Nations (ECOSOC)**
- He has authored such papers as,
 - "Solutions to the global environmental crisis"
(Address at the **United Nations**).
 - "The electromagnetic dimension of indoor environments"
(Proceedings: **5th International conference on Indoor Air Quality and
Climate**; Toronto, 1990).
 - "Nuclear fuel waste management and disposal concept"
 - "Electromagnetic fields exposure and incidence of breast cancer"
(Proceedings: **World Conference on Breast Cancer**; Ottawa, Ontario.
July 26-31, 1999; also in *Explore for the Professional*.
Volume 9(6). July, 2000.
 - "Practical EMF pointers"
- He has edited/co-edited such books as:
 - New energy technology,
 - Basis of electromagnetic hygiene,
 - Studying problems associated with video display systems,
 - The ELF factor: selected bibliography,
 - Emerging energy science
(also developed into an electronic information database of same name),

- VDT sources: the ELF factor, selected references,
- An ELF primer.
- He has served as Scientific Advisor/Consultant for:
 - national prime-time **NOVA** TV series, TV specials, and award-winning documentaries:
 - scientific advisor of national prime-time TV special Nikola Tesla - the forgotten genius,
 - special advisor to the producer of the film, The secret of Nikola Tesla (with Orson Welles),
 - scientific advisor for the award-winning (best United Kingdom documentary of the year) **BBC Horizon/NOVA** series production, The mysterious Mr. Tesla;
 - producer of the investigative TV documentary, The question of video display terminals.
 - international EMF organizations (South Africa, Netherlands) and their initiatives.
- Between 1993 and 1996, he headed the **Canada Mortgage and Housing Corporation (CMHC)** study team analyzing electromagnetic fields (EMF) in Canadian houses.
- In 2012, he developed the Safe Housing Guideline for the **Canada Mortgage and Housing Corporation (CMHC).**
- From 1980 - present (2018), EMF shielding, electric & hybrid car, and protective testing and evaluation for **Consumer Reports.**
- He has presented briefs
 - at the **United Nations (UN),** Geneva and New York
 - at the **Royal Society of Canada**
- He
 - lectures before scientific and engineering societies
 - makes presentations on current scientific issues before concerned groups.
- Since 1991, he has been providing extended Workshops on EMF, some of which lead to certificates, with a view on enabling participants to identify and to mitigate EMF problems in the built environment.
- He has been and is a recognized legal EMF issues expert witness; expropriation electromagnetic field (EMF) affectation assessment reports.

[<http://www.essentia.ca/Workshops/workshops.htm>]

Electromagnetic fields at home, at work WORKSHOP

*Characteristics, health effects, how to properly
detect problem sources and identify effective mitigation*

Dr. Andrew Michrowski, instructor

\$ 395 (minus \$25 per person, if 2 or more attending) + HST.
price reductions apply for advance payments, please inquire
Friday introductory only: \$75 (minus \$25, 2 persons) + HST

WHO SHOULD ATTEND?

health practitioners, architects, engineers, electricians, the responsible laypersons willing to improve their lifestyle.

Electromagnetic spectrum; bioeffects: electric, magnetic, electromagnetic fields; thermal/non thermal, linear/ non-linear effects; absorption characteristics; scalars; melatonin link;
symptoms for types of exposure;
transmission & propagation of electromagnetic signals; harmonics, transients, damping.., exposure situations; magnification and reduction;
guidelines - their development; emerging regulations;
exposure hygiene: who should be protected, at what age, where (school, bedroom, long-term usage, medical device usage);
wiring types, code, grounding,
typical problems/inexpensive solutions;
critical exposures: workstation and therapy area environment; rural environments;
measuring equipment: electrical, electrostatics/ion discrimination, magnetic (dosimeters, gaussmeters, single and multi-pole probe), static magnetic fields; RF & mw; ammeter; electrical resistivity;
protocol and procedure; **tracing; geopathics** and health - situations and health effects;
hypersensitivity - allergen link with electromagnetics;
subtle energy interface;
interface of medication; subtle energy therapeutics;
personal protection devices - what to expect, rationale.

Friday evening session is introductory and for the general public,

Saturday, Sunday sessions are directed at professional training. (Your professional society may grant education credits for the workshop.)

Certificate issued, at request, upon successful exam

WORKSHOP SYNOPSIS

Friday (introductory) 7 - 10 PM

Electromagnetic spectrum; its use by sector, mode of transmission as dependent on frequency and wavelength, dispersion; **Nomenclature:** Hertz, Tesla, Gauss, Watt/cm². **Range of bioeffects:** electric, magnetic, electromagnetic; differentiation between thermal and non thermal, linear and non-linear; absorption characteristics; scalar electromagnetics; the melatonin connection. **Transmission & distribution:** wiring, transmission lines, antennae. **Concept of circuits. Voltage / amperage. Harmonics, transients,** beating of 2 or more frequencies [$F_1 + F_2 = (F_1 + F_2) + (F_1 - F_2) / 30 + 10 = 40 + 20$]. **How magnetic fields are magnified:** spacing of conduits (knob and tube wiring), loop circuits, re-radiation phenomena. **How magnetic fields may be reduced:** phasing, compacting wires; annulling; counteractors; "white noise" formula; shock bow effect / Faraday effect; absorption. **Type of situations encountered:** wiring configuration -- knob & tube, series, grounding wires, transmission lines, shielding with *MuMetal*. **Guidelines** based on independent European experience -- how developed in early

1980s. **New regulations** coming along: 2mG, preference for 1mG. **Exposure hygiene:** who should be protected, as of what age, where (school, bedroom, long-term usage). **Symptoms to look out for** (powerline frequencies: German statistics; for microwave: disorientation, incoherence immune system breakdown)

Saturday (practical) 9AM - 5PM

Basic wiring configurations: panel, sub-panel (good & to avoid). **Electrical Code** grounding requirements. **Purpose of grounding systems.** **Mitigation:** sundry fields; water main problematics. re-grounding, transformer poles, some neighbourhood dynamics; isolation of critical areas - bedroom, etc. **Work environments & EMI** - classroom dynamics, farm environments (general and barns), supercomputer facilities.

Sunday (hands-on experience) 9AM - 5PM

Equipment: electrical, electrostatics / ion discrimination, magnetic (dosimeters, gaussmeters, single and multi-pole probe), static magnetic fields; RF & MW; ammeter. **Protocol and procedure of analysis of situation** (indoor/outdoor, peripheral, walk through, profiles). **Tracing. Determination of panel-driven EMF. Balance equation of grounding returns:** neutral, grounding wire, TV, Cable. **Hands-on experience.**

Instructor: A. Michrowski

Dr. Andrew Michrowski studied at the faculties of Architecture and Urbanism at the **Politecnico di Milano**, Milan, Italy, where he received his *Dott. Arch.* Degree with honours. He has served with the Department of **Indian and Northern Affairs** as Chief Planner, followed by senior positions with the **Secretary of State** of Canada as forecaster, analyst and program evaluator.

He has authored such papers as, *Solutions to the global environmental crisis* (Address at the **United Nations**), *The electromagnetic dimension of indoor environments* (5th International conference on Indoor Air), *Nuclear fuel waste management and disposal concept* and *Practical EMF pointers*. He has edited, co-edited such books as: *New energy technology*, *Basis of electromagnetic hygiene*, *Studying problems associated with video display systems*, *The ELF factor: selected bibliography*, *Emerging energy science* (also developed into an electronic information database of same name), *VDT sources: the ELF factor, selected references*, and *An ELF primer*.

He was scientific advisor of a national prime-time TV special, *Nikola Tesla - the forgotten genius*, special advisor to the producer of the film, *The secret of Nikola Tesla* (with Orson Welles), scientific advisor for the award-winning (best United Kingdom documentary of the year) **BBC Horizon/NOVA** series production, *The mysterious Mr. Tesla*; and, producer of the investigative TV documentary, *The question of video display terminals*.

He lectures before scientific and engineering societies and makes presentations on current scientific issues before concerned groups. Since 1991, he has been providing extended workshops, some of which lead to certificates, on EMF with a view of enabling participants to identify and to mitigate EMF problems in the built environment. Between 1993 and 1996 he headed the study team analyzing electromagnetic fields in Canadian houses for **Canada Mortgage and Housing Corporation**.

Please call for information on our next workshop in your area.

MONTREAL les 25, 26, 27 mars 2011

TORONTO: Coming soon – please inquire

OTTAWA: Coming soon, with emphasize on **Safe Building EMF guidelines / Building inspector protocols / upgrading certification levels** – please inquire

VANCOUVER: Coming soon – please inquire

Friday evening: from 7 - 10 PM / Saturday and Sunday: from 9AM to 5PM

ESSENTIA

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* includes survey, report, recommendations, mitigation follow-up and consultation.



This is a report on the review of the California Council on Science and Technology document, "Health Impacts of Radiofrequency from Smart Meters". I am a public health physician and former Dean of the School of Public Health at the University at Albany. I have been involved in review and analysis of studies on electromagnetic fields, including radiofrequency fields, for many years. I served as the Executive Secretary to the New York State Powerlines Project in the 1980s, and have published several reviews on the subject and have edited two books. In addition I was invited to present to the recent President's Cancer Panel on the subject of powerline and radiofrequency fields and cancer.

This document is not an accurate description of the state of the science on the issue of radiofrequency fields, and is full of inaccuracies. My specific concerns are as follows:

1. The benefit of the smart meters is entirely to the utilities, and is economic in nature. If they install smart meters they can fire those individuals who at present are employed to go around reading meters. Thus this is a job-killing proposal, and will increase unemployment in a state that already has too much.
2. When a smart meter is installed residents have no choice in the matter nor ability to avoid exposure. But every individual has the option to use or not use other personal wireless devices, until more is known about health consequences of chronic RF exposure. There is a major difference between an exposure which an individual chooses to accept and one that is forced on individuals who can do nothing about it.
3. The statement "The potential for behavioral disruption from increase body tissue temperatures is the only biological health impact that has been consistently demonstrated and scientifically proven to result from absorbing RF within the band of the electromagnetic spectrum that smart meters use" is totally wrong. In the first place there are many adverse health effects other than "behavioral disruption" demonstrated as a result of tissue heating. The evidence for increased risk of brain tumors, acoustic neuromas and parotid gland tumors in individuals who have used a cell phone for 10 years or more is consistent, and the tumors occur predominantly on the side of the head where the phone is used. There is also strong and consistent evidence for increased risk of leukemia in individuals who live near to high power AM radio transmission towers, even though this report characterizes such exposures as being "quite low" and show in Figure 7 that they are lower than the RF fields from smart meters.
4. The statement "The scientific consensus is that body temperatures must increase at least 1°C to lead to potential biological impacts from the heat" is totally wrong, and makes it obvious that no persons with medical or biological expertise participated in this report. Every enzyme system in the body is exquisitely sensitive to temperature, and increases activity by even a fraction of a degree increase in temperature. In fact all RF generates heat, and what is defined as "non-thermal" is only a function of our ability to measure the temperature increase.
5. The statement "While concerns of brain cancer associated with mobile phone usage persist, there is currently no definitive evidence linking cell phone usage with increased incidence of cancer" is incorrect. The evidence is strong and consistent among studies looking at long-term and intensive use of cell phones. The AM radio studies mentioned above are also relevant, particularly because like smart phones radio transmission towers give whole body radiation, not just to the head.
6. The statement "There currently is no conclusive scientific evidence pointing to a non-thermal cause-and-effect between human exposure to RF emissions and negative health impacts is



inaccurate, and depends totally on what one defines as conclusive". In biology and medicine there is nothing that is 100% proven. We rely on statistical significance and weight of evidence when drawing conclusions about health effects. When one uses these definitions there is conclusive scientific evidence for adverse health effects in humans.

- 7. The evidence for adverse effects of radiofrequency radiation is currently strong and grows stronger with each new study. Wired meters with shielded cable do not increase exposure. The report clearly indicates that "smart meters could conceivably be adapted to non-wireless transmission of data. However, retrofitting millions of smart meters with hard-wired technology could be difficult and costly." Clearly the answer to this dilemma is not to install wireless smart meters to begin with.

Thank you for the opportunity to comment on this faulty report, and on the general issue of smart meters. Their use is unwise from both a public health point of view, which is where my expertise lies, but and also from a purely short and long-term economic point of view.

Yours sincerely,

David O. Carpenter, M.D.
Director, Institute for Health and the Environment
University at Albany

Smart Meters: Correcting the Gross Misinformation

[agfauteux](#) | 11 juin 2012 | [60 Commentaires](#)

Quebec-based magazine La Maison du 21e siecle asked physician David O. Carpenter, former founding dean of the University at Albany (NY)'s School of Public Health, to comment on an open letter published in the Montreal daily Le Devoir last May 24. This letter claimed wireless smart meters pose no risk to public health. More than fifty international experts contributed to the following rebuttal.



Dr David O. Carpenter, founder, University at Albany (NY) School of Public Health

We, the undersigned are a group of scientists and health professionals who together have coauthored hundreds of peer-reviewed studies on the health effects of electromagnetic fields (EMFs). We wish to correct some of the gross misinformation found in the letter regarding wireless "smart" meters that was published in the Montreal daily *Le Devoir* on May 24. Submitted by a group Quebec engineers, physicists and chemists, the letter in question reflects an obvious lack of understanding of the science behind the health impacts of the radiofrequency (RF)/microwave EMFs emitted by these meters.

The statement that « Thousands of studies, both epidemiological and experimental in humans, show no increase in cancer cases as a result of exposure to radio waves of low intensity... » is false (1). In fact, only a few such studies — two dozen case-control studies of mobile phone use, certainly not thousands, have reported no elevations of cancer, and

most were funded by the wireless industry. In addition, these reassuring studies contained significant experimental design flaws, mainly the fact that the populations followed were too small and were followed for a too short period of time.

Non industry-funded studies have clearly demonstrated a significant increase in cancer cases among individuals who have suffered from prolonged exposure to low-level microwaves, transmitted notably by radio antennas. The effects were best documented in meta-analyses that have been published and that include grouped results from several different studies: these analyses consistently showed an increased risk of brain cancer among regular users of a cell phone who have been exposed to microwaves for at least ten years.

Brain Cancer Rates

Furthermore, the argument that brain cancer rates do not indicate an overall increase in incidence is not evidence that cell phones are safe: the latency for brain cancer in adults after environmental exposure can be long, up to 20-30 years. Most North Americans haven't used cell phones extensively for that long. The evidence of the link between long-term cell phone use and brain cancer comes primarily from Northern Europe, where cell phones have been commonly used since the 1990s. Nevertheless, the most recent collection of primary brain tumors mined from pathology units in Australia showed brain cancer incidence rose by about 35% between 2000 and 2008 in the Australian Capital Territory and New South Wales (total population : more than 7 million).

Children are especially at risk. In May 2012, the U.K.'s Office of National Statistics reported a 50 percent increase in incidence of frontal and temporal lobe tumors in children between 1999 and 2009. This statistic is especially disturbing since in May 2011, after reviewing the published scientific literature regarding cancers affecting cell phone users, the International Agency for Research on Cancer (IARC) classified radiofrequency radiation as a 2B, possible human carcinogen. Despite the absence of scientific consensus, the evidence is sufficiently compelling for any cautious parent to want to reduce their loved one's exposure to RF/microwave emissions as much as possible, as recommended by various countries such as Austria, Belgium, Germany, Russia and the United Kingdom.

Electrosensitivity

Public fears about wireless smart meters are well-founded. They are backed by various medical authorities such as those of the Santa Cruz County (California) Public Health Department. These authorities are worried about the growing number of citizens who say they have developed electrohypersensitivity (EHS), especially since for many of them, the symptoms developed after the installation of such meters (it takes some time for most people to link the two events).

Since the turn of the millennium, people are increasingly affected by ambient microwaves due to the growing popularity of wireless devices such as cell phones and Wi-Fi Internet. Therefore, the mass deployment of smart grids could expose large chunks of the general population to alarming risk scenarios without their consent. According to seven surveys done in six European countries between 2002 and 2004, about 10% of Europeans have

become electrosensitive. The most famous person to publicly reveal her electrosensitivity is Gro Harlem Brundtland, formerly Prime Minister of Norway and retired Director of the World Health Organization (WHO).

While there is no consensus on the origins and mechanisms of EHS, many physicians and other specialists around the world have become aware that EHS symptoms (neurological dermatological, acoustical, etc.) seem to be triggered by exposure to EMF levels well below current international exposure limits, which are established solely on short-term thermal effects (2). Organizations such as the Austrian Medical Association and the American Academy of Environmental Medicine have recognized that the ideal way to treat of EHS is to reduce EMF exposure.

Therefore, caution is warranted because the growing variety of RF/microwave emissions produced by many wireless devices such as smart meters have never been tested for their potential biological effects.

Well-known bioeffects

While the specific pathways to cancer are not fully understood, it is scientifically unacceptable to deny the weight of the evidence regarding the increase in cancer cases in humans that are exposed to high levels of RF/microwave radiation.

The statement that « there is no established mechanism by which a radio wave could induce an adverse effect on human tissue other than by heating » is incorrect, and reflects a lack of awareness and understanding of the scientific literature on the subject. In fact, more than a thousand studies done on low intensity, high frequency, non-ionizing radiation, going back at least fifty years, show that some biological mechanisms of effect do not involve heat. This radiation sends signals to living tissue that stimulate biochemical changes, which can generate various symptoms and may lead to diseases such as cancer.

Even though RF/microwaves don't have the energy to directly break chemical bonds, unlike ionizing radiation such as X-rays, there is scientific evidence that this energy can cause DNA damage indirectly leading to cancer by a combination of biological effects. Recent publications have documented the generation of free radicals, increased permeability of the blood brain barrier allowing potentially toxic chemicals to enter the brain, induction of genes, as well as altered electrical and metabolic activity in human brains upon application of cell phone RF/microwaves similar to those produced by smart meters.

These effects are cumulative and depend on many factors including RF/microwave levels, frequency, waveform, exposure time, biovariability between individuals and combination with other toxic agents. Clear evidence that these microwaves are indeed bioactive has been shown by the fact that low-intensity EMFs have proven clinically useful in some circumstances. Pulsed EMFs have long been used to successfully treat bone fractures that are resistant to other forms of therapy. More recently, frequency-specific, amplitude-modulated EMFs have been found useful to treat advanced carcinoma and chronic pain.

High frequency EMFs such as the microwaves used in cell phones, smart meters, Wi-Fi and cordless “DECT” phones, appear to be the most damaging when used commonly. Most of their biological effects, including symptoms of electrohypersensitivity, can be seen in the damage done to cellular membranes by the loss of structurally-important calcium ions. Prolonged exposure to these high frequencies may eventually lead to cellular malfunction and death.

Furthermore, malfunction of the parathyroid gland, located in the neck just inches from where one holds a cell phone, may actually cause electrohypersensitivity in some people by reducing the background level of calcium ions in the blood. RF/microwave radiation is also known to decrease the production of melatonin, which protects against cancer, and to promote the growth of existing cancer cells.

Early warning scientists attacked

In recommending that the Precautionary Principle be applied in EMF matters, the European Environment Agency’s Director Jacqueline McGlade wrote in 2009: “We have noted from previous health hazard histories such as that of lead in petrol, and methyl mercury, that ‘early warning’ scientists frequently suffer from discrimination, from loss of research funds, and from unduly personal attacks on their scientific integrity. It would be surprising if this is not already a feature of the present EMF controversy... » Such unfortunate consequences have indeed occurred.

The statement in the *Le Devoir* letter that «if we consider that a debate should take place, it should focus exclusively on the effects of cell phones on health » is basically an acknowledgement that there is at least some reason to be concerned about cell phones. However, while the immediate exposure from a cell phone is of much greater intensity than the exposure from smart meters, cell phone use is temporary.

Smart meters

As Australian Associate Professor of neurosurgery Vini G. Khurana reports, adverse neurological effects have been reported in people who sustain close proximity to wireless meters, especially under 10 feet (3 metres):

A wireless smart meter produces radiofrequency microwave radiation with two antennas in approximately the same frequency range (900 MHz to 2.4 GHz) as a typical cell tower. But, depending on how close it is to occupied space within a home, a smart meter can cause much higher RF exposures than cell towers commonly do. If a smart meter is located on a common wall with a bedroom or kitchen rather than a garage wall, for example, the RF exposure can be the same as being within 200 to 600 feet distance of a cell tower with multiple carriers. With both cell towers and smart meters, the entire body is immersed by microwaves that go out in all directions, which increases the risk of overexposure to many sensitive organs such as the eyes and testicles. With a cell phone, people are exposed to microwaves primarily in the head and neck (unless using speaker mode), and only when they use their device.

Wireless smart meters typically produce atypical, relatively potent and very short pulsed RF/microwaves whose biological effects have never been fully tested. They emit these millisecond-long RF bursts on average 9,600 times a day with a maximum of 190,000 daily transmissions and a peak level emission two and a half times higher than the stated safety signal, as the California utility Pacific Gas & Electric recognized before that State's Public Utilities Commission. Thus people in proximity to a smart meter are at risk of significantly greater aggregate of RF/microwave exposure than with a cell phone, not to mention the cumulative exposure received by people living near multiple meters mounted together, pole-mounted routers or utility collector meters using a third antenna to relay RF signals from 500 to 5,000 homes.

A technical study performed by Sage Associates in California indicates that RF levels from various scenarios depicting normal smart meter installation and operation may violate even the out-of-date US public safety standards which only consider acute thermal effects. This can happen when a person stands close to the meter to read the power consumption, or touches it, or shades the meter face with a hand to better read it. Emissions are also increased by reflective materials, such as stainless steel, other metals and mirrors, which can re-radiate stronger than the otherwise unaltered background. Microwaves are absorbed and dissipated by partially conductive materials, such as cement and special RF shielding paints and fabrics.

In addition to the erratic bursts of modulated microwaves emitted by wireless smart meters transferring usage data to electric, gas and water utilities, wireless as well as wired smart (powerline communication) meters are also a major source of "dirty electricity" (electrical interference of high frequency voltage transients typically of kilohertz frequencies). Some scientists, such as American epidemiologist Sam Milham, believe that many of the health complaints about smart meters may also be caused by dirty electricity generated by the « switching » power supply activating all smart meters. Since the installation of filters to reduce dirty electricity circulating on house wiring has been found to relieve symptoms of EHS in some people, this method should be considered among the priorities aimed at reducing potential adverse impacts. Indeed, the Salzburg State (Austria) Public Health Department confirms its concern about the potential public health risk when in coming years almost every electric wire and device will emit such transient electric fields in the kilohertz-range due to wired smart meters.

Rather be safe than sorry

The apparent adverse health effects noted with smart meter exposure are likely to be further exacerbated if smart appliances that use wireless communications become the norm and further increase unwarranted exposure.

To date, there have been few independent studies of the health effects of such sources of more continuous but lower intensity microwaves. However, we know after decades of studies of hazardous chemical substances, that chronic exposure to low concentrations of microwaves can cause equal or even greater harm than an acute exposure to high concentrations of the same microwaves.

This is why so many scientists and medical experts urgently recommend that measures following the Precautionary Principle be applied immediately — such as using wired meters — to reduce biologically inappropriate microwave exposure. We are not advocating the abolishment of RF technologies, only the use of common sense and the development and implementation of best practices in using these technologies in order to reduce exposure and risk of health hazards.

1. Scientific papers on EMF health effects

2. Explanation and studies on electrosensitivity

3. Governments and organizations that ban or warn against wireless technology

- David O. Carpenter, MD, Director, Institute for Health & the Environment, University at Albany, USA
- M. S. H. Al Salameh, PhD, Professor of Electrical Engineering, University of Science & Technology, Irbid, Jordan
- Jennifer Armstrong, MD, Past President, American Society for Environmental Medicine, Founder, Ottawa Environmental Health Clinic, Ontario, Canada
- Pierre L. Auger, MD, Occupational medicine, Multiclinique des accidentés 1464, Montreal, Quebec, Canada
- Igor Beliaev, PhD, Head research scientist, Cancer Research Institute, Slovak Academy of Sciences, Bratislava, Slovak republic
- Fiorella Belpoggi, PhD, Director Cesare Maltoni Cancer Research Center, Ramazzini Institute, Bologna, Italy
- Dominique Belpomme, MD, Director of the European Cancer and Environment Research Institute, Brussels, Belgium
- Martin Blank, PhD, former President, Bioelectromagnetics Society, Special Lecturer, Department of Physiology and Cellular Biophysics, Columbia University Medical Center, New York, USA
- Barry Bréger, MD, Centre d'intégration somatosopique (orthomolecular medicine), Montreal, Quebec
- Simona Carrubba, PhD, Prof. Biophysics, Daemen College, Amherst, NY, Associate Researcher, Neurology, Buffalo General Hospital, Buffalo, NY
- John Cline, MD, Professor, Institute for Functional Medicine, Federal Way, WA, USA; Medical Director, Cline Medical Centre, Nanaimo, BC, Canada
- Alvaro Augusto de Salles, PhD, Professor of Electrical Engineering, Federal University of Rio Grande do Sul, Porto Alegre, Brazil
- Christos Georgiou, Prof. Biochemistry, Biology Department, University of Patras, Greece
- Andrew Goldsworthy, PhD, Honorary lecturer in Biology, Imperial College, London, UK
- Claudio Gómez-Perretta, MD, Director, Centro de Investigación, Hospital Universitario LA Fe, Valencia, Spain
- Livio Giuliani, PhD, Senior Researcher, National Insurance Institute (INAIL), Chief of Radiation and Ultrasounds Research Unit, Rome, Italy
- Yury Grigoriev, PhD, Chair Russian National Committee on Non-Ionizing Radiation Protection, Moscow, Russia
- Settimio Grimaldi, PhD, Director, Institute of Translational Pharmacology (Neurobiology and molecular medicine), National Research Council, Rome, Italy
- Magda Havas, PhD, Centre for Health Studies, Trent University, Canada

- Lennart Hardell, MD, Professor of Oncology, University Hospital, Örebro, Sweden
- Denis L. Henshaw, PhD, Professor of Physics, Head of The Human Radiation Effects Group, University of Bristol, UK
- Ronald B. Herberman, MD, Chairman of Board, Environmental Health Trust, and Founding Director emeritus, University of Pittsburgh Cancer Institute, USA
- Donald Hillman, PhD, Dairy Science, Professor Emeritus, Department of Animal Science, Michigan State University, USA
- Isaac Jamieson, PhD, Environmental Science (electromagnetic phenomena in the built environment), independent architect, scientist and environmental consultant, Hertfordshire, UK
- Olle Johansson, PhD, Professor of Neuroscience (Experimental Dermatology Unit), Karolinska Institute, Stockholm, Sweden
- Yury Kronn, PhD, Soviet authority on physics of nonlinear vibrations and high frequency electromagnetic vibrations, founder of Energy Tools International, Oregon, USA
- Vini G. Khurana, MBBS, Associate of Professor of Neurosurgery, Australian National University, Australia
- Henry Lai, PhD, Professor of Bioengineering, University of Washington School of Medicine, Seattle, WA, USA
- Abraham R. Liboff, PhD, Professor Emeritus, Department of Physics, Oakland University, Rochester, Michigan, USA
- Don Maisch, PhD, Researcher on radiation exposure standards for telecommunications frequency, EMFacts Consultancy, Tasmania, Australia
- Erica Mallery-Blythe, MD, Emergency Medicine Physician, England
- Andrew A. Marino, MD, Professor of Neurology, LSU Health Sciences Center, Shreveport, LA, USA
- Karl Maret, MD, President, Dove Health Alliance, Aptos, CA, USA
- Fiorenzo Marinelli, PhD, Researcher on biological effects of EMFs, Institute of Molecular Genetics, National Research Council, Bologna, Italy
- Andrew Michrowski, PhD, Director, Planetary Association for Clean Energy, Ottawa, Canada
- Sam Milham, MD, former chief epidemiologist, Washington State Department of Health, USA
- Joel M. Moskowitz, PhD, Director, Center for Family and Community Health, School of Public Health, University of California, Berkeley
- Gerd Oberfeld, MD, Public Health Department, Salzburg State Government, Austria
- Mike O'Carroll, PhD, Professor Emeritus (Applied Mathematics), University of Sunderland, UK
- Jerry L. Phillips, PhD, Director, Center for Excellence in Science, Department of Chemistry and Biochemistry, University of Colorado, USA
- John Podd, PhD, Professor of Psychology (experimental neuropsychology), Massey University, New-Zeland
- William J. Rea, MD, thoracic and cardiovascular surgeon, founder of the Environmental Health Center, Dallas, Tx, USA
- Elihu D. Richter, MD, Professor, Hebrew University-Hadassah School of Public Health and Community Medicine, Jerusalem, Israel
- Leif G. Salford, MD, Senior Professor of Neurosurgery, Lund University, Sweden

- **Nesrin Seyhan**, MD, Founder and Chair of Biophysics, Medical Faculty of Gazi University, Turkey
- **Cyril W. Smith**, PhD, lead author of “Electromagnetic Man”, retired from Electronic and Electrical Engineering, University of Salford, UK
- **Morando Soffritti**, MD, Scientific Director of the European Foundation for Oncology and Environmental Sciences “B. Ramazzini” in Bologna, Italy
- **Carlos Sosa**, MD, surgeon affected by the Microwave syndrome, Medellin, Columbia
- **Antoinette “Toni” Stein**, PhD, Collaborative on Health and the Environment (CHE-EMF Working Group), Co-Coordinator, Berkeley, CA, USA
- **Stanislaw Szmigielski**, MD, PhD Professor of Pathophysiology, Consulting Expert, former director of Microwave Safety, Military Institute of Hygiene and Epidemiology, Warsaw, Poland
- **Lauraine Vivian**, PhD, Senior Lecturer, Primary Health Care Directorate, Faculty of Health Sciences, University of Cape Town, South Africa.
- **Bradford S. Weeks**, MD, Director, The Weeks Clinic, Clinton, WA, USA
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Public health implications of wireless technologies

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Abstract

Global exposures to emerging wireless technologies from applications including mobile phones, cordless phones, DECT phones, WI-FI, WLAN, WiMAX, wireless internet, baby monitors, and others may present serious public health consequences. Evidence supporting a public health risk is documented in the BioInitiative Report. New, biologically based public exposure standards for chronic exposure to low-intensity exposures are warranted. Existing safety standards are obsolete because they are based solely on thermal effects from acute exposures. The rapidly expanding development of new wireless technologies and the long latency for the development of such serious diseases as brain cancers means that failure to take immediate action to reduce risks may result in an epidemic of potentially fatal diseases in the future. Regardless of whether or not the associations are causal, the strengths of the associations are sufficiently strong that in the opinion of the authors, taking action to reduce exposures is imperative, especially for the fetus and children. Such action is fully compatible with the precautionary principle, as enunciated by the Rio Declaration, the European Constitution Principle on Health (Section 3.1) and the European Union Treaties Article 174. © 2009 Elsevier Ireland Ltd. All rights reserved.

Keywords: Wireless technology; Brain cancer; Radiofrequency; Cell phones; Wireless antenna facilities; Childrens' health

1. Introduction and background

Exposure to electromagnetic fields (EMF) has been linked to a variety of adverse health outcomes that may have significant public health consequences [1–13]. The most serious health endpoints that have been reported to be associated with extremely low frequency (ELF) and/or RF include childhood and adult leukemia, childhood and adult brain tumors, and increased risk of the neurodegenerative diseases, Alzheimer's and amyotrophic lateral sclerosis (ALS). In addition, there are reports of increased risk of breast cancer in both men and women, genotoxic effects (DNA damage and micronucleation), pathological leakage of the blood–brain barrier, altered immune function including increased allergic and inflammatory responses, miscarriage and some cardiovascular effects [1–13]. Insomnia (sleep disruption) is reported in studies of people living in very low-intensity RF environments with WI-FI and cell tower-level exposures [85–93]. Short-term effects on cognition, memory and learning, behavior, reaction time, attention and concentration, and altered

brainwave activity (altered EEG) are also reported in the scientific literature [94–107]. Biophysical mechanisms that may account for such effects can be found in various articles and reviews [136–144].

The public health implications of emerging wireless technologies are enormous because there has been a very rapid global deployment of both old and new forms in the last 15 years. In the United States, the deployment of wireless infrastructure has accelerated greatly in the last few years with 220,500 cell sites in 2008 [14–16]. Eighty-four percent of the population of the US own cell phones [16]. Annualized wireless revenues in 2008 will reach \$144 billion and US spending on wireless communications will reach \$212 billion by 2008. Based on the current 15% annual growth rate enjoyed by the wireless industry, in the next 5 years wireless will become a larger sector of the US economy than both the agriculture and automobile sectors. The annualized use of cell phones in the US is estimated to be 2.23 trillion minutes in 2008 [16]. There are 2.2 billion users of cell phones worldwide in 2008 [17] and many million more users of cordless phones.

Over 75 billion text messages were sent in the United States, compared with 7.2 billion in June 2005, according to

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CTIA, the Wireless Association, the leading industry trade group [16]. The consumer research company Nielsen Mobile, which tracked 50,000 individual customer accounts in the second quarter of this year, found that Americans each sent or received 357 text messages a month then, compared with 204 phone calls. That was the second consecutive quarter in which mobile texting significantly surpassed the number of voice calls [17].

The Electronics Industries Alliance (EIA) represents 80% of the \$550 billion US electronics industry: “that provides two million jobs for American workers.” Its members include companies from the consumer electronics and telecommunications industries, among others [17].

There is intense industry competition for market share. Telecom taxes form an immense revenue generator for the government sector. Sale of the airwaves (auctions selling off wireless bandwidth) is a multi-million dollar industry for governments, and multi-billion dollar global advertising budgets are common. Lobbying dollars from the telecom-related industries are estimated to be \$300 million annually. The media is nearly silent on health issues, perhaps in part because of global advertising revenues that compromise journalistic independence and discourage balanced coverage of health, equity and economic issues.

2. Evidence supporting a public health risk

Even if there is only a small risk to health from chronic use of and exposure to wireless technologies, there is the potential for a profound public health impact. RF radiation now saturates the airwaves, resulting in exposure to both users and non-users. The effects are both short-term (sleep disruption, hormone disruption, impairment of cognitive function, concentration, attention, behavior, and well-being) and they are almost certainly long-term (generational impacts on health secondary to DNA damage, physiological stress, altered immune function, electrosensitivity, miscarriage risks, effects on sperm quality and motility leading to infertility, increased rates of cancer, and neurological diseases including Alzheimer’s disease and ALS—at least for ELF exposures). (Chapters 5–12 of the BioInitiative Report [1] and papers in this Supplement.)

There is credible scientific evidence that RF exposures cause changes in cell membrane function, metabolism and cellular signal communication, as well as activation of proto-oncogenes and triggering of the production of stress proteins at exposure levels below current regulatory limits. There is also generation of reactive oxygen species, which cause DNA damage, chromosomal aberrations and nerve cell death. A number of different effects on the central nervous system have also been documented, including activation of the endogenous opioid systems, changes in brain function including memory loss, slowed learning, motor dysfunction and performance impairment in children, and increased frequency of headaches, fatigue and sleep disorders. Melatonin secretion

is reduced, resulting in altered circadian rhythms and disruption of several physiological functions. (Chapters 5–12 of the BioInitiative Report [1] and papers in this Supplement.)

These effects can reasonably be presumed to result in adverse health effects and disease with chronic and uncontrolled exposures, and children may be particularly vulnerable [1,19]. The young are also largely unable to remove themselves from such environments. Second-hand non-ionizing radiation, like second-hand smoke may be considered of public health concern based on the evidence at hand.

2.1. Malignant brain tumors

At present, the most persuasive evidence for cancer resulting from RF exposure is that there is a significantly increased risk of malignant glioma in individuals that have used a mobile phone for 10 or more years, with the risk being elevated only on the side of the head on which the phone is used regularly (ipsilateral use) [1,3,4,6–8,18]. While the risk for adults after 10 or more years of use is reported to be more than doubled, there is some evidence beginning to appear that indicates that the risk is greater if the individual begins to use a mobile phone at younger ages. Hardell et al. [18] reported higher odds ratios in the 20–29-year-old group than other age ranges after more than 5 years of use of either analog or cordless phones. Recently in a London symposium Hardell reported that after even just 1 or more years of use there is a 5.2-fold elevated risk in children who begin use of mobile phones before the age of 20 years, whereas for all ages the odds ratio was 1.4. Studies from Israel have found that the risk of parotid gland tumors (a salivary gland in the cheek) is increased with heavy cell phone use [7]. The risk of acoustic neuroma (a benign but space-occupying tumor on the auditory nerve) is also significantly increased on the ipsilateral side of the head after 10 or more years of mobile phone use [1,3]. This relationship has also been documented in some of the published reports of the WHO Interphone Study, a decade-long 13-country international assessment of cell phone risks and cancer [6,8].

Kundi reports that “(E)pidemiological evidence compiled in the last 10 years starts to indicate an increased risk, in particular for brain tumors (glioma, meningioma, acoustic neuroma), from mobile phone use. Considering biases that may have been operating in most studies the risk estimates are rather too low, although recall bias could have increased risk estimates. The net result, when considering the different errors and their impact is still an elevated risk” [19].

The latency for most brain tumors is 20 years or more when related to other environmental agents, for example, to X-ray exposure. Yet, for cell phone use the increased risks are occurring much sooner than twenty years, as early as 10 years for brain tumors in adults and with even shorter latencies in children. This suggests that we may currently be significantly underestimating the impact of current levels of

use of RF technology, since we do not know how long the average latency period really is. If it is 20 years, then the risk rate will likely be much higher than an overall doubling of risk for cell phone users if the peak comes later than 10 years. It may also signal very troubling risks for those who start using cell phones, and perhaps all wireless devices, in early childhood. We may not have proof of effect for decades until many hundreds of thousands of new cases of malignant gliomas are set in motion by long-term cell phone use.

The preliminary evidence that mobile phone use at younger ages may lead to greater risk than for older persons is of particular concern. There is a large body of evidence that childhood exposure to environmental agents poses greater risk to health than comparable exposure during adulthood [20,21]. There is reason to expect that children would be more susceptible to the effects of EMF exposure since they are growing, their rate of cellular activity and division is more rapid, and they may be more at risk for DNA damage and subsequent cancers. Growth and development of the central nervous system is still occurring well into the teenage years so that neurological changes may be of great importance to normal development, cognition, learning, and behavior.

A greater vulnerability of children to developing brain cancer from mobile phone use may be the consequence of a combination of patterns of use, stage of development and physical characteristics related to exposure. In addition to the fact that the brain continues to develop through the teen years, many young children and teenagers now spend very large periods of time using mobile phones. The brain is the main target organ of cell phones and cordless phones, with highest exposure to the same side as the phone is used. Further, due to anatomical reasons, the brain of a child is more exposed to RF radiation than the brain of an adult [22,23]. This is caused by the smaller brain size, a thinner pinna of the ear, thinner skin and thinner skull bone permitting deeper penetration into the child's brain. A recent French study showed that children absorb twice the RF from cell phone use as do adults [24].

In addition to concerns about cancer, there is evidence for short-term effects of RF exposure on cognition, memory and learning, behavior, reaction time, attention and concentration, altered brainwave activity (altered EEG) [95–108], and all of these effects argue for extreme caution with regard to exposure of children. The development of children into adults is characterized by faster cell division during growth, the long period needed to fully develop and mature all organ systems, and the need for properly synchronized neural development until early adulthood. Chronic, cumulative RF exposures may alter the normal growth and development of children and adversely affect their development and capacity for normal learning, nervous system development, behavior and judgment [1,97,102].

Prenatal exposure to EMF has been identified as a possible risk factor for childhood leukemia (1). Maternal use of cell phones has been reported to adversely affect fetal brain development, resulting in behavioral problems in those children by

the time they reach school age [25]. Their exposure is involuntary in all cases. Children are largely unable to remove themselves from exposures to harmful substances in their environments.

2.2. Plausible biological mechanisms for a relationship between RF exposure and cancer

2.2.1. DNA damage and oxidative stress

Damage to DNA from ELF and from RF cell phone frequencies at very low intensities (far below FCC and ICNIRP safety limits) has been demonstrated in many studies [1,2,26–35]. Both single- and double-strand DNA damage have been reported by various researchers in different laboratories. This is damage to the human genome, and can lead to mutations which can be inherited, or which can cause cancer, or both.

Non-ionizing radiation is assumed to be of too low energy to cause direct DNA damage. However both ELF and RF radiation induce reactive oxygen species, free radicals that react with cellular molecules including DNA. Free-radical production and/or the failure to repair DNA damage (secondary to damage to the enzymes that repair damage) created by such exposures can lead to mutations. Whether it is greater free-radical production, reduction in anti-oxidant protection or reduced repair capacity, the result will be altered DNA, increased risk of cancer, impaired or delayed healing, and premature aging [36–54]. Exposures have also been linked to decreased melatonin production, which is a plausible biological mechanism for decreased cancer surveillance in the body, and increased cancer risk [34,39,44,46,47,49,50,54]. An increased risk of cancers and a decrease in survival has been reported in numerous studies of ELF and RF [55–69].

2.2.2. Stress proteins (heat shock proteins or HSP)

Another well-documented effect of exposure to low-intensity ELF and RF is the creation of stress proteins (heat shock proteins) that signal a cell is being placed under physiological stress [70–80]. The HSP response is generally associated with heat shock, exposure to toxic chemicals and heavy metals, and other environmental insults. HSP is a signal of cells in distress. Plants, animals and bacteria all produce stress proteins to survive environmental stressors like high temperatures, lack of oxygen, heavy metal poisoning, and oxidative stress.

We can now add ELF and RF exposures to this list of environmental stressors that cause a physiological stress response. Very low-level ELF and RF exposures can cause cells to produce stress proteins, meaning that the cell recognizes ELF and RF exposures as harmful. This is another important way in which scientists have documented that ELF and RF exposures can be harmful, and it happens at levels far below the existing public safety standards. An additional concern is that if the stress goes on too long, the protective effect is diminished. The reduced response with prolonged exposure means the cell is less protected against

damage, and this is why prolonged or chronic exposures may be harmful, even at very low intensities.

2.2.3. RF-induced gene expression changes

Many environment agents cause diseases, including cancer, not by direct damage to DNA but rather by up- or down-regulation of genes that regulate cell growth and function. Usually there are many genes whose expression is changed, and it is difficult to determine the exact changes responsible for the disease. Both ELF and RF exposures have been shown to result in altered gene expression. Olivares-Banuelos et al. [81] found that ELF exposure of chromaffin cells resulted in changed expression of 53 transcripts. Zhao et al. [82] investigated the gene expression profile of rat neurons exposed to 1800 MHz RF fields (2 W/kg) and found 24 up-regulated genes and 10 down-regulated genes after a 24-h exposure. The altered genes were involved in multiple cellular functions including cytoskeleton, signal transduction pathways and metabolism. Kariene et al. [83] exposed human skin to mobile phone radiation, and found by punch biopsy that 8 proteins were significantly altered in expression, consistent with gene induction. Several other studies have found altered gene expression following RF exposure, although none have been found that explain specific disease states [84].

DNA activation at very low ELF and RF levels, as in the stress response, and DNA damage (strand breaks and micronuclei) at higher levels, are molecular precursors to changes that are believed to lead to cancer. These, along with gene induction, provide plausible biological mechanisms linking exposure to cancer.

The biochemical pathways that are activated are the same for ELF and for RF exposures, and are non-thermal (do not require heating or induced electrical currents). This is true for the stress response, DNA damage, generation of reactive oxygen species as well as gene induction. Thus it is not surprising that the major cancers resulting from exposure to ELF and RF are the same, namely leukemia and brain cancer. The safety standards for both ELF and RF, based on protection from heating, are irrelevant and not protective. ELF exposure levels of only 5–10 mG have been shown to activate the stress response genes (<http://www.bioinitiative.org>, Sections 1 and 7 [1]).

3. Sleep, cognitive function and performance

The relationship of good sleep to cognition, performance and healing is well recognized. Sleep is a profoundly important factor in proper healing; anti-inflammatory benefits, reduction in physical symptoms of such as tendonitis, over-use syndrome, fatigue-induced lethargy, cognition and learning. Incomplete or slowed physiological recovery is common when sleep is impaired. Circadian rhythms that normalize stress hormone production (cortisol, for example) depend on synchronized sleep patterns.

People who are chronically exposed to low-level wireless antenna emissions report symptoms such as problems in sleeping (insomnia), as well as other symptoms that include fatigue, headache, dizziness, grogginess, lack of concentration, memory problems, ringing in the ears (tinnitus), problems with balance and orientation, and difficulty in multi-tasking [85–93,99]. In children, exposures to cell phone radiation have resulted in changes in brain oscillatory activity during some memory tasks [97,102]. Cognitive impairment, loss of mental concentration, distraction, speeded mental function but lowered accuracy, impaired judgment, delayed reaction time, spatial disorientation, dizziness, fatigue, headache, slower motor skills and reduced learning ability in children and adults have all been reported [85–108].

These symptoms are more common among “electrosensitive” individuals, although electrosensitivity has not been documented in double-blind tests of individual identifying themselves as being electrosensitive as compared to controls [109,110]. However people traveling to laboratories for testing are pre-exposed to a multitude of RF and ELF exposures, so they may already be symptomatic prior to actual testing. There is also evidence that RF exposures testing behavioral changes show delayed results; effects are observed after termination of RF exposure. This suggests a persistent change in the nervous system that may be evident only after time has passed, so is not observed during a short testing period.

3.1. Plausible biological mechanisms for neurobehavioral effects

3.1.1. The melatonin hypothesis

While there remains controversy as to the degree that RF and ELF fields alter neurobehavioral function, emerging evidence provides a plausible mechanism for both effects on sleep and cognition. Sleep is controlled by the central circadian oscillator in the suprachiasmatic nucleus, located in the hypothalamus. The activity of this central circadian oscillator is, in turn, controlled by the hormone, melatonin, which is released from the pineal gland [111]. There is considerable evidence that ELF exposure reduces the release of melatonin from the pineal gland—see Section 12 of the Bioinitiative Report [1]. There has been less study of the effects of RF exposure on melatonin release, but investigations have demonstrated a reduced excretion of the urinary metabolite of melatonin among persons using a mobile phone for more than 25 min per day [112]. In a study of women living near to radio and television transmitters, Clark et al. [113] found no effect on urinary melatonin metabolite excretion among pre-menopausal women, but a strong effect in post-menopausal women.

The “melatonin hypothesis” also provides a possible basis for other reported effects of EMFs. Melatonin has important actions on learning and memory, and inhibits electrophysiological components of learning in some but not all areas of the brain [114,115]. Melatonin has properties as a free-radical scavenger and anti-oxidant [116], and consequently,

a reduction in melatonin levels would be expected to increase susceptibility to cancer and cellular damage. Melatonin could also be the key to understanding the relationship between EMF exposure and Alzheimer's disease. Noonan et al. [117] reported that there was an inverse relationship between excretion of the melatonin metabolite and the 1–42 amino acid form of amyloid beta in electric utility workers. This form of amyloid beta has been found to be elevated in Alzheimer's patients.

3.1.2. Blood–brain barrier alterations

Central nervous system effects of EMFs may also be secondary to damage to the blood–brain barrier (BBB). The blood–brain barrier is a critical structure that prevents toxins and other large molecules that are in peripheral blood from having access to the brain matter itself. Salford et al. [118] have reported that a 2-h exposure of rats to GSM-900 radiation with a SAR of 2–200 mW/kg resulted in nerve cell damage. In a follow-up study, Eberhardt et al. report that 2-h exposures to cell phone GSM microwave RF resulted in leakage of albumin across the blood–brain barrier and neuronal death [119]. Neuronal albumin uptake was significantly correlated to occurrence of damaged neurons when measured at 28 days post-exposure. The lowest exposure level was 0.12 mW/kg (0.00012 W/kg) for 2 h. The highest exposure level was 120 mW/kg (0.12 W/kg). The weakest exposure level showed the greatest effect in opening the BBB [118]. Earlier blood–brain studies by Salford and Schirmer [120,121] report similar effects.

4. What are sources of wireless radiation?

There are many overlapping sources of radiofrequency and microwave emissions in daily life, both from industrial sources (like cell towers) and from personal items [cell and cordless phones, personal digital assistants (PDAs), wireless routers, etc.]. Published data on typical levels found in some cities and from some sources are available at <http://www.bioinitiative.org> [1,122–124].

Cell phones are the single most important source of radiofrequency radiation to which we are exposed because of the relatively high exposure that results from the phone being held right against the head. Cell phones produce two types of emissions that should be considered. First, the radiofrequency radiation (typically microwave frequency radiation) is present. However, there is also the contribution of the switching battery pack that produces very high levels of extremely low frequency electromagnetic field [125–127].

Cordless telephones have not been widely recognized as similar in emissions to cell phones, but they can and do produce significant RF exposures. Since people tend to use them as substitutes for in-home and in-office corded or traditional telephones, they are often used for long periods of time. As the range of cordless phones has increased (the distance away that you can carry on a conversation is related to the power

output of the phone), the more powerful the RF signal will be. Hence, newer cordless phones may in some cases be similar to the power output of cell phones. The cumulative emissions from cell and cordless phones taken together should be recognized when considering the relative risks of wireless communication exposures.

PDAs such as the BlackBerry, Treo and iPhone units are 'souped-up' versions of the original voice communication devices (cell phones). They often produce far higher ELF emissions than do cell phones because they use energy from the battery very intensively for powering color displays and during data transmission functions (email, sending and receiving large files, photos, etc.) [125–127]. ELF emissions have been reported from PDAs at several tens to several hundreds of milligauss. Evidence of significantly elevated ELF fields during normal use of the PDA has public health relevance and has been reported in at least three scientific papers [125,128,129]. In the context of repetitive, chronic exposure to significantly elevated ELF pulses from PDAs worn on the body, relevant health studies point to a possible relationship between ELF exposure and cancer and pregnancy outcomes [130–133].

We include discussion of the ELF literature for two reasons. As mentioned above ELF activates the same biology as RF, it contributes to the total EMF burden of the body. In addition, PDAs and cell phones emit both radiofrequency/microwave radiation (RF) and extremely low frequency ELF from the battery switching of the device (the power source). Studies show that some devices produce excessively high ELF exposures during voice and data transmission. ELF is already classified as a 2B (Possible) Carcinogen by IARC, which means that ELF is indisputably an issue to consider in the wireless technology debate. ELF has been classified as a Group 2B carcinogen for all humans, not just children. The strongest evidence came from epidemiological studies on childhood leukemia, but the designation applies to all humans, both adults and children [1,25].

Wireless headsets that allow for conversations with cell phones at a distance from the head itself reduce the emissions. Depending on the type of wireless device, they may operate (transmit signal) only during conversations or they may be operational continuously. The cumulative dose of wireless headsets has not been well characterized under either form of use. Substantial cumulative RF exposure would be expected if the user wears a wireless headset that transmits a signal continuously during the day. However a critical factor is where the cell phone is placed. If worn on a belt with a headset, the exposure to the brain is reduced but the exposure to the pelvis may be significant.

Cell towers (called "masts" in Europe and Scandinavian countries) are wireless antenna facilities that transmit the cell phone signals within communities. They are another major source of RF exposures for the public. They differ from RF exposures from wireless devices like cell phones in that they produce much lower RF levels (generally 0.05 to 1–2 $\mu\text{W}/\text{cm}^2$ in the first several hundred feet around them) in comparison to several hundred microwatts per centimeter

squared for a cell phone held at the head. However they create a constant zone of elevated RF for up to 24 h per day, many hours per day, and the exposure is whole body rather than localized at the head. These facilities are the distribution system for wireless voice communications, internet connections and data transmission within communities. They are often erected on free-standing towers. They may be constructed on telephone poles or electrical poles. They may be built into the façade or rooftops of buildings behind wood screening. These are called stealth installations for wireless antenna facilities. Some installations are camouflaged to resemble 'false trees or rocks'. They emit RF to provide cell service to specific "cells" or locations that receive the signal.

Other forms of wireless transmission that are common in areas providing cell service are wireless land area networks (WLAN), (WiMAX) and WIFI networks. Some cities are installing city-wide WIFI service to allow any user on the street to log into the internet (without cables or wire connections). WIFI installations may have a signal reach for a few hundred feet where WiMAX installations may transmit signal more than 10 miles, so produce a stronger RF emission for those in close proximity. Each type has its particular signal strength and intended coverage area, but what they have in common is the production of continuous RF exposure for those within the area. We do not know what the cumulative exposure (dose) might be for people living, working or going to school in continuously elevated RF fields, nor are the possible health implications yet known. However, based on studies of populations near cell sites in general, there is a constellation of generally observed health symptoms that are reported to occur [85–107]. In this regard it is important to note that children living near to AM radio transmitters have been found to elevated risks of leukemia [134,135]. While AM radio RF fields are lower in frequency than that common in mobile phones, this is a total body irradiation with RF. The fact that leukemia, not brain cancer, is apparent in these studies suggests that leukemia is the cancer seen at the lowest levels of both ELF and RF fields under the circumstances of whole-body exposure.

Commercial surveillance systems or security gates pose an additional source of strong RF exposures. They are ubiquitous in department stores, markets and shops at the entry and exit points to discourage shoplifting and theft of goods. Security gates can produce excessively high RF exposures (although transitory) and have been associated with interference with pacemakers in heart patients. The exposure levels may approach thermal public safety limits in intensity, although no one expects a person to stand between the security gate bars for more than 6 min (safety limits for uncontrolled public access are variable depending on the frequency, but are all averaged over a 6-min exposure period).

RFID chips (radiofrequency identification chips) are being widely used to track purchases and for security of pets, and in some cases to keep track of patients with Alzheimer's disease and of children. RFID chips are implanted in fabrics, inserted in many types of commercial goods, and can be implanted

under the skin. They create a detectable signal to track the location of people and goods.

5. Problems with existing public health standards (safety limits)

If the existing standards were adequate none of the effects documented above should occur at levels to which people are regularly exposed. The fact that these effects are seen with our current ambient levels of exposure means that our existing public safety standards are obsolete. It also means that new, biologically based public exposure standards for wireless technologies are urgently needed. Whether it is feasible to achieve low enough levels that still work and also protect health against effects of chronic RF exposure – for all age groups – is uncertain. Whether we can protect the public and still allow the kinds of wireless technology uses we see today is unknown.

The nature of electromagnetic field interactions with biological systems has been well studied [136–144]. For purposes of standard-setting processes for both ELF and RF, the hypothesis that tissue damage can result only from heating is the fundamental flaw in the misguided efforts to understand the basic biological mechanisms leading to health effects.

The thermal standard is clearly untenable as a measure of dose when EMF stimuli that differ by many orders of magnitude in energy can stimulate the same biological response. In the ELF range, the same biological changes occur as in the RF, and no change in temperature can even be detected. With DNA interactions the same biological responses are stimulated in ELF and RF ranges even though the frequencies of the stimuli differ by many orders of magnitude. The effects of EMF on DNA to initiate the stress response or to cause molecular damage reflect the same biology in different frequency ranges. For this reason it should be possible to develop a scale based on DNA biology, and use it to define EMF dose in different parts of the EM spectrum. We also see a continuous scale in DNA experiments that focus on molecular damage where single and double strand breaks have long been known to occur in the ionizing range, and recent studies have shown similar effects in both ELF and RF ranges [144].

Existing standard-setting bodies that regulate wireless technologies, assume that there are no bioeffects of concern at exposure levels that do not cause measurable heating. However, it has been established beyond any reasonable doubt that bioeffects and some adverse health effects occur at far lower levels of RF and ELF exposure where no heating (or induced current) occurs; some effects are shown to occur a thousand times or more below the existing public safety limits. New, biologically based public exposure limits are urgently needed. New wireless technologies for cell and cordless phones, other wireless communication and data transmission systems affect living organisms in new ways that our antiquated safety limits have not foreseen, nor protected against.

The exposure of children to electromagnetic fields has not been studied extensively; in fact, the Federal Communications Commission (FCC) standards for exposure to radiofrequency radiation are based on the height, weight and stature of a 6-foot tall man, not scaled to children or adults of smaller stature. They do not take into account the unique susceptibility of growing children to exposures, nor are there studies of particular relevance to children.

In addition there is a problem in the consideration of the level of evidence taken into consideration by these bodies. There have not been adequate animal models shown to have cancer as an endpoint, and a perception that no single mechanism is proven to explain these associations. Thus these committees have tended to ignore or minimize the evidence for direct hazard to humans, and believe there is no proof of cause and effect. These bodies assume from the beginning that only conclusive scientific evidence (absolute proof) will be sufficient to warrant change, and refuse to take action on the basis of a growing body of evidence which provides early but consequential warning of risks.

The Radiofrequency Interagency Working Group of the US governmental agencies involved in RF matters (RFIAWG) issued a Guidelines Statement in June of 1999 that concluded the present RF standard “may not adequately protect the public” [145]. The RFIAWG identified fourteen (14) issues that they believe are needed in the planned revisions of ANSI/IEEE RF exposure guidelines including “to provide a strong and credible rationale to support RF exposure guidelines”. In particular, the RFIAWG criticized the existing standards as not taking into account chronic, as opposed to acute exposures, modulated or pulsed radiation (digital or pulsed RF is proposed at this site), time-averaged measurements that may erase the unique characteristics of an intensity-modulated RF radiation that may be responsible for reported biologic effects, and stated the need for a comprehensive review of long-term, low-level exposure studies, neurological-behavioral effects and micronucleus assay studies (showing genetic damage from low-level RF) [145]. This important document from relevant US agencies questions existing standards in the following ways: (a) selection of an adverse effect level for chronic exposures not based on tissue heating and considering modulation effects; (b) recognition of different safety criteria for acute and chronic exposures at non-thermal or low-intensity levels; (c) recognition of deficiencies in using time-averaged measurements of RF that does not differentiate between intensity-modulated RF and continuous wave (CW) exposure, and *therefore may not adequately protect the public*; (d) having standards based on adult males rather than considering children to be the most vulnerable group.

6. Prudent public health responses

Emerging environmental health problems require preventative public health responses even where scientific and

medical uncertainties still exist, but where policy decisions today may greatly reduce human disease and societal costs tomorrow.

Policy decisions in public health must address some amount of uncertainty when balancing likely benefits and estimated costs. Although new insight will allow better appreciation of difficult issues, such as those occurring in environmental and occupational health, an expanded perspective may also enlarge the list of problems that need to be managed. Ignoring the problems carries its own costs (as deferring a decision is a decision in itself). With environmental and other public health problems becoming increasingly complex and international in scope, scientific documentation alone rarely justifies simple solutions [146].

Social issues regarding the controversy over public and occupational exposures to ELF and RF center on the resolute adherence to existing ICNIRP and FCC/IEEE standards by many countries, in the face of growing scientific evidence of health risks at far lower levels [10]. The composition of these committees, usually with excessive representation of the physics and engineering communities rather than public health professionals, results in a refusal to adopt biologically based exposure standards. Furthermore, there is widespread belief that governments are ignoring this evidence and there is widespread distrust of and lack of confidence in governments and their health agencies. The basis on which most review bodies and standard-setting agencies have avoided the conclusion that the science is strong enough to warrant new safety limits for ELF and RF is to require a demonstration of absolute proof before taking action. A causal level of evidence, or scientific certainty standard is implicit in nearly all reviews of the ELF and RF science, although this runs counter to good public health protection policies.

There is no question that global implementation of the safety standards proposed in the Bioinitiative Report, if implemented abruptly and without careful planning, have the potential to not only be very expensive but also disruptive of life and the economy as we know it. Action must be a balance of risk to cost to benefit. The major risk from maintaining the status quo is an increasing number of cancer cases, especially in young people, as well as neurobehavioral problems at increasing frequencies. The benefits of the status quo are expansion and continued development of communication technologies. But we suspect that the true costs of even existing technologies will only become much more apparent with time. Whether the costs of remedial action are worth the societal benefits is a formula that should reward precautionary behavior. Prudent corporate policies should be expected to address and avoid future risks and liabilities, otherwise, there is no market incentive to produce safe (and safer) products.

The deployment of new technologies is running ahead of any reasonable estimation of possible health impacts and estimates of probabilities, let alone a solid assessment of risk. However, what has been missing with regard to EMF has been an acknowledgement of the risk that is demonstrated by

the scientific studies. There is clear evidence of risk, although the magnitude of the risk is uncertain, and the magnitude of doing nothing on the health effects cost to society is similarly uncertain. This situation is very similar to our history of dealing with the hazards of smoking decades ago, where the power of the industry to influence governments and even conflicts of interest within the public health community delayed action for more than a generation, with consequent loss of life and enormous extra health care costs to society. New standards are warranted now, based on the totality of scientific evidence; the risks of taking no-action, the large population at risk, costs associated with ignoring the problem in new and upgraded site selection and construction, and the loss of public trust by ignoring the problem.

Direct medical and rehabilitative health costs associated with treatment for diseases that are reasonably related to wireless technologies may be very large. Although there is uncertainty involved in how much disease is related to wireless exposures, the mere scale of the problem with several billion users of cell phones and even larger impacts on bystander populations (from cell site exposures, from other WI-FI and wireless exposures in-home and commercial use, etc.) the associated public health costs will likely be monumental. Furthermore the costs to families with cancers, neurological diseases or learning disabilities in children related in part or in whole to wireless technologies extend beyond medical costs. They may reasonably extend to family disruption and family psychological problems; losses in job productivity and income loss.

The history of governments and their official health agencies to deal with emerging and newly identified risks to health is not good [147–149]. This is particularly true where industry investments in new products and technologies occur without full recognition, disclosure or even knowledge of possible health consequences. Large economic investments in polluting industries often make for perilously slow regulatory action, and the public health consequences may be very great as a result [150,151].

Free markets do not internalize the costs to society of “guessing wrong”. Unexpected or hidden health costs of new technologies may not be seen for many years, when the ability to recall or to identify the precise exposures related to disease outcomes is difficult or impossible. The penalty nearly always falls to the individual, the family or the taxpayer and not to the industry that benefits economically—at least in free-market economies. Thus, the profits go to industry but the costs may go to the individual who can suffer both diminished quality of life and health and economic disadvantage. If all disease endpoints that may be reasonably related to chronic exposure to electromagnetic fields are considered even a small attributable fraction for one or more industries, it will have enormous global impact on public health. The public health implications are immense. But they can be reduced by strong government and public health interventions providing information on alternatives to wireless technologies, public education campaigns, health advisories,

Table 1

Public health implications of wireless technologies argue for change in governmental and health agency actions.

Secure US and EU legislative mandates for safer technologies for communication and data transmission, for security and surveillance needs.
Promote wired alternatives for voice and data communication (cable, fiber-optic)
Discourage or ban use of cell phones by children and young teen-agers
Provide permanent (unremovable) labels on cell phones “Not for use by children under the age of 16”
Implement national public education campaigns on health issues (cell phones, cordless phones, PDAs, wireless internet, city-wide WI-FI, WLAN and WiMAX exposures)
Promote industry redesign for safer products: support innovation for alternatives and solutions
Slow or stop deployment of wireless technologies to discourage reliance on wireless technologies for communication and security needs
Put the burden of proof on industry to show “new wireless tech” is safe before deployment
Adopt and enforce restricted use areas for sensitive or more vulnerable segments of society including low-EMF environments in public areas and “No Cell” zones in airports, hospitals, schools
Acknowledge FCC and ICNIRP thermal safety standards are obsolete for wireless technologies
Appoint new standard-setting bodies familiar with biological effects to develop new guidelines for public safety limits.
Develop new biologically based standards that address low-intensity, chronic exposures
Require standard of evidence and level of proof = public health
Reject “causal” standard of evidence for taking action on science
Make industry financially liable for “guessing wrong” and ignoring health risks

requirements for redesign of wireless devices, proscription of use of wireless devices by children and teenagers, strong and independent research programs on causes and prevention of EMF-related diseases, and consultation with all stakeholders on issues relating to involuntary exposures (bystander or second-hand radiation exposures from wireless technologies) (Table 1).

The scientific information contained in this Supplement argues for thresholds or guidelines that are substantially below current FCC and ICNIRP standards for localized exposures to wireless devices and for whole-body exposure. Uncertainty about how low such standards might have to go to be prudent from a public health standpoint should not prevent reasonable efforts to respond to the information at hand. No lower limit for bioeffects and adverse health effects from RF has been established, so the possible health risks of wireless WLAN and WI-FI systems, for example, will require further research. No assertion of safety at any level of wireless exposure (chronic exposure) can be made at this time. The lower limit for reported human health effects has dropped 100-fold below the safety standard (for mobile phones and PDAs); 1000–10,000-fold for other wireless (cell towers at distance; WI-FI and WLAN devices). The entire basis for safety standards is called into question, and it is not unreasonable to question the safety of RF at any level.

It is likely that for both ELF and RF, as for other carcinogens, there is no threshold of exposure that is without risk, but the magnitude of the risk increases linearly with the level of exposure. Our society will not go back to the pre-electric and pre-wireless age, but the clear evidence of health hazards to the human population from exposure mandates that we develop ways in which to reduce exposure through education, new technologies and the establishment of biomedically based standards.

7. Conclusions and recommended actions

New ELF limits are warranted based on a public health analysis of the overall existing scientific evidence. These limits should reflect environmental levels of ELF that have been demonstrated to increase risk for childhood leukemia, and possibly other cancers and neurological diseases. ELF limits should be set below those exposure levels that have been linked in childhood leukemia studies to increased risk of disease, plus an additional safety factor. It is no longer acceptable to build new power lines and electrical facilities that place people in ELF environments that have been determined to be risky. These levels are in the 2–4 milligauss (mG) range (0.2–0.4 μT), not in the 10 s of mG or 100 s of mG. The existing ICNIRP limit is 1000 mG (100 μT) and 904 mG (90.4 μT) in the US for ELF is outdated and based on faulty assumptions. These limits are can no longer be said to be protective of public health and they should be replaced. A safety buffer or safety factor should also be applied to a new, biologically based ELF limit, and the conventional approach is to add a safety factor lower than the risk level.

While new ELF limits are being developed and implemented, a reasonable approach would be a 1 mG (0.1 μT) planning limit for habitable space adjacent to all new or upgraded power lines and a 2 mG (0.2 μT) limit for all other new construction. It is also recommended that a 1 mG (0.1 μT) limit be established for existing habitable space for children and/or women who are pregnant (because of the possible link between childhood leukemia and *in utero* exposure to ELF). This recommendation is based on the assumption that a higher burden of protection is required for children who cannot protect themselves, and who are at risk for childhood leukemia at rates that are traditionally high enough to trigger regulatory action. This situation in particular warrants extending the 1 mG (0.1 μT) limit to existing occupied space. “Establish” in this case probably means formal public advisories from relevant health agencies. While it is not realistic to reconstruct all existing electrical distribution systems, in the short-term; steps to reduce exposure from these existing systems need to be initiated, especially in places where children spend time, and should be encouraged. These limits should reflect the exposures that are commonly associated with increased risk of childhood leukemia (in the 2–5 mG (0.2–0.5 μT) range for all children, and over 1.4 mG (0.14 μT) for children age 6 and younger). Nearly all of

the occupational studies for adult cancers and neurological diseases report their highest exposure category is 4 mG (0.4 μT) and above, so that new ELF limits should target the exposure ranges of interest, and not necessarily higher ranges.

Avoiding chronic ELF exposure in schools, homes and the workplace above levels associated with increased risk of disease will also avoid most of the possible bioactive parameters of ELF discussed in the relevant literature.

It is not prudent public health policy to wait any longer to adopt new public safety limits for ELF. These limits should reflect the exposures that are commonly associated with increased risk of childhood leukemia (in the 2–5 mG (0.2–0.5 μT) range for all children, and over 1.4 mG (0.14 μT) for children age 6 and younger). Avoiding chronic ELF exposure in schools, homes and the workplace above levels associated with increased risk of disease will also avoid most of the possible bioactive parameters of ELF discussed in the relevant literature.

The rapid deployment of new wireless technologies that chronically expose people to pulsed RF at levels reported to cause bioeffects, which in turn, could reasonably be presumed to lead to serious health impacts, is a public health concern. There is suggestive to strongly suggestive evidence that RF exposures may cause changes in cell membrane function, cell communication, metabolism, activation of proto-oncogenes and can trigger the production of stress proteins at exposure levels below current regulatory limits. Resulting effects can include DNA breaks and chromosome aberrations, cell death including death of brain neurons, increased free-radical production, activation of the endogenous opioid system, cell stress and premature aging, changes in brain function including memory loss, retarded learning, performance impairment in children, headaches and fatigue, sleep disorders, neurodegenerative conditions, reduction in melatonin secretion and cancers (BioInitiative Report Chapters 5–10, 12) [1].

This information now argues for thresholds or guidelines that are substantially below current FCC and ICNIRP standards for whole-body exposure. Uncertainty about how low such standards might have to go to be prudent from a public health standpoint should not prevent reasonable efforts to respond to the information at hand. No lower limit for bioeffects and adverse health effects from RF has been established, so the possible health risks of wireless WLAN and WI-FI systems, for example, will require further research and no assertion of safety at any level of wireless exposure (chronic exposure) can be made at this time. The lower limit for reported human health effects has dropped 100-fold below the safety standard (for mobile phones and PDAs); 1000–10,000-fold for other wireless (cell towers at distance; WI-FI and WLAN devices). The entire basis for safety standards is called into question, and it is not unreasonable to question the safety of RF at any level.

A cautionary target level for pulsed RF exposures for ambient wireless that could be applied to RF sources from cell tower antennas, WI-FI, WI-MAX and other similar sources

is proposed. The recommended cautionary target level is 0.1 microwatts per centimeter squared ($\mu\text{W}/\text{cm}^2$) (or 0.614 V per meter or V/m) for pulsed RF where these exposures affect the general public; this advisory is proportionate to the evidence and in accord with prudent public health policy. A precautionary limit of 0.1 $\mu\text{W}/\text{cm}^2$ should be adopted for outdoor, cumulative RF exposure. This reflects the current RF science and prudent public health response that would reasonably be set for pulsed RF (ambient) exposures where people live, work and go to school. This level of RF is experienced as whole-body exposure, and can be a chronic exposure where there is wireless coverage present for voice and data transmission for cell phones, pagers and PDAs and other sources of radiofrequency radiation. An outdoor precautionary limit of 0.1 $\mu\text{W}/\text{cm}^2$ would mean an even lower exposure level inside buildings, perhaps as low as 0.01 $\mu\text{W}/\text{cm}^2$. Some studies and many anecdotal reports on ill health have been reported at lower levels than this; however, for the present time, it could prevent some of the most disproportionate burdens placed on the public nearest to such installations. Although this RF target level does not preclude further rollout of WI-FI technologies, we also recommend that wired alternatives to WI-FI be implemented, particularly in schools and libraries so that children are not subjected to elevated RF levels until more is understood about possible health impacts. This recommendation should be seen as an interim precautionary limit that is intended to guide preventative actions; and more conservative limits may be needed in the future.

Broadcast facilities that chronically expose nearby residents to elevated RF levels from AM, FM and television antenna transmission are also of public health concern given the potential for very high RF exposures near these facilities (antenna farms). RF levels can be in the 10s to several 100s of $\mu\text{W}/\text{cm}^2$ in residential areas within half a mile of some broadcast sites (for example, Lookout Mountain, Colorado and Awbrey Butte, Bend, Oregon). Like wireless communication facilities, RF emissions from broadcast facilities that are located in, or expose residential populations and schools to elevated levels of RF will very likely need to be re-evaluated for safety.

For emissions from wireless devices (cell phones, personal digital assistant or PDA devices, etc.) there is enough evidence for increased risk of brain tumors and acoustic neuromas now to warrant intervention with respect to their use. Redesign of cell phones and PDAs could prevent direct head and eye exposure, for example, by designing new units so that they work only with a wired headset or on speakerphone mode.

These effects can reasonably be presumed to result in adverse health effects and disease with chronic and uncontrolled exposures; and children may be particularly vulnerable. The young are also largely unable to remove themselves from such environments. Second-hand radiation, like second-hand smoke is an issue of public health concern based on the evidence at hand.

In summary, the following recommendations are made:

- ELF limits should be set below those exposure levels that have been linked in childhood leukemia studies to increased risk of disease, plus an additional safety factor. It is no longer acceptable to build new power lines and electrical facilities that place people in ELF environments that have been determined to be risky (at levels generally at 2 mG (0.2 μT) and above).
- While new ELF limits are being developed and implemented, a reasonable approach would be a 1 mG (0.1 μT) planning limit for habitable space adjacent to all new or upgraded power lines and a 2 mG (0.2 μT) limit for all other new construction. It is also recommended for that a 1 mG (0.1 μT) limit be established for existing habitable space for children and/or women who are pregnant. This recommendation is based on the assumption that a higher burden of protection is required for children who cannot protect themselves, and who are at risk for childhood leukemia at rates that are traditionally high enough to trigger regulatory action. This situation in particular warrants extending the 1 mG (0.1 μT) limit to existing occupied space. "Establish" in this case probably means formal public advisories from relevant health agencies.
- While it is not realistic to reconstruct all existing electrical distributions systems, in the short-term; steps to reduce exposure from these existing systems need to be initiated and should be encouraged; especially in places where children spend time.
- A precautionary limit of 0.1 $\mu\text{W}/\text{cm}^2$ (which is also 0.614 V per meter) should be adopted for outdoor, cumulative RF exposure. This reflects the current RF science and prudent public health response that would reasonably be set for pulsed RF (ambient) exposures where people live, work and go to school. This level of RF is experienced as whole-body exposure, and can be a chronic exposure where there is wireless coverage present for voice and data transmission for cell phones, pagers and PDAs and other sources of radiofrequency radiation. Some studies and many anecdotal reports on ill health have been reported at lower levels than this; however, for the present time, it could prevent some of the most disproportionate burdens placed on the public nearest to such installations. Although this RF target level does not preclude further rollout of WI-FI technologies, we also recommend that wired alternatives to WI-FI be implemented, particularly in schools and libraries so that children are not subjected to elevated RF levels until more is understood about possible health impacts. This recommendation should be seen as an interim precautionary limit that is intended to guide preventative actions; and more conservative limits may be needed in the future.

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SECTION I

Preface

Prepared for the BioInitiative Working Group
December 2012

PREFACE

Today, the BioInitiative 2012 Report updates five years of science, public health, public policy and global response to the growing health issue of chronic exposure to electromagnetic fields and radiofrequency radiation in the daily life of billions of people around the world.

The BioInitiative 2012 Report has been prepared by 29 authors from ten countries*, ten holding medical degrees (MDs), 21 PhDs, and three MsC, MA or MPHs. Among the authors are three former presidents of the Bioelectromagnetics Society, and five full members of BEMS. One distinguished author is the Chair of the Russian National Committee on Non-Ionizing Radiation. Another is a Senior Advisor to the European Environmental Agency. As in 2007, each author is responsible for their own chapter.

The great strength of the BioInitiative Report (www.bioinitiative.org) is that it has been done independent of governments, existing bodies and industry professional societies that have clung to old standards. Precisely because of this, the BioInitiative Report presents a solid scientific and public health policy assessment that is evidence-based.

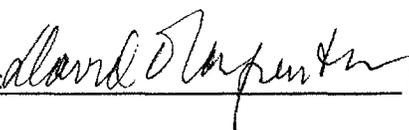
The BioInitiative Report was first posted in August 2007. It still has a significant international viewing audience. Each year, about 1,000,000 people still visit the site. In the five years since it's publication, the BioInitiative website has been accessed over 10.5 million times, or four times every minute. Every five minutes on the average, a person somewhere in the world has logged on. More than 5.2 million files and 1 million pages of information has been downloaded. That is equivalent to more than 93,000 full copies of the 650+ page report (288.5 million kbytes).

The global conversation on why public safety limits for electromagnetic and radiofrequency fields remain thousands of times higher than exposure levels that health studies consistently show to be associated with serious health impacts has intensified since 2007. Roughly, 1800 new studies have been published in the last five years reporting effects at exposure levels ten to hundreds or thousands of times lower than allowed under safety limits in most countries of the world. Yet, no government has instituted comprehensive reforms. Some actions have been taken that highlight partial solutions. The Global Actions chapter presents milestone events that characterize the international 'sea change' of opinion that has taken place, and reports on precautionary advice and actions from around the world.

* Sweden (6), USA (10), India (2), Italy (2), Greece (2), Canada (2), Denmark (1), Austria (2), Slovak Republic (1), Russia (1)

The world's populations – from children to the general public to scientists and physicians – are increasingly faced with great pressures from advertising urging the incorporation of the latest wireless device into their everyday lives. This is occurring even while an elementary understanding the possible health consequences is beyond the ability of most people to grasp. The exposures are invisible, the testing meters are expensive and technically difficult to operate, the industry promotes new gadgets and generates massive advertising and lobbying campaigns that silence debate, and the reliable, non-wireless alternatives (like wired telephones and utility meters) are being discontinued against public will. There is little labeling, and little or no informed choice. In fact there is often not even the choice to stay with safer, wired solutions, as in the case of the 'smart grid' and smart wireless utility metering, an extreme example of a failed corporate-governmental partnership strategy, ostensibly for energy conservation.

A collision of the wireless technology rollout and the costs of choosing unwisely is beginning and will grow. The groundwork for this collision is being laid as a result of increased exposure, especially to radiofrequency fields, in education, in housing, in commerce, in communications and entertainment, in medical technologies and imaging, and in public and private transportation by air, bus, train and motor vehicles. Special concerns are the care of the fetus and newborn, the care for children with learning disabilities, and consideration of people under protections of the Americans With Disabilities Act, which includes people who have become sensitized and physiologically intolerant of chronic exposures. The 2012 Report now addresses these issues as well as presenting an update of issues previously discussed.

Signed: 

David Carpenter, MD
Co-Editor
BioInitiative Report

Signed: 

Cindy Sage, MA
Co-Editor
BioInitiative Report



SECTION II

Table of Contents

Prepared for the BioInitiative Working Group
2012

The BioInitiative 2012 Table of Contents

SECTION i	PREFACE (2007) (2012)
SECTION ii	TABLE OF CONTENTS (2007) (2012)
SECTION 1	<u>SUMMARY FOR THE PUBLIC AND CONCLUSIONS</u> Ms. Sage <u>2007 Report: Summary for the Public (Table 1-1 Conclusions)- Ms. Sage</u> <u>2012 Supplement - Summary for the Public - Ms. Sage</u> <u>Table 1-1 - Conclusions</u> <u>Table 1-2 Reported Biological Effects from Radiofrequency Radiation at Low-Intensity Exposure</u>
SECTION 2	<u>STATEMENT OF THE PROBLEM</u> Ms. Sage
SECTION 3	<u>THE EXISTING PUBLIC EXPOSURE STANDARDS</u> Ms. Sage
SECTION 4	<u>EVIDENCE FOR INADEQUACY OF THE STANDARDS</u> Ms. Sage
SECTION 5	<u>EVIDENCE FOR EFFECTS ON GENE AND PROTEIN EXPRESSION (Transcriptomic and Proteomic Research)</u> Dr. Xu and Dr. Chen <u>2012 Supplement - Dr. Fragopoulou and Dr. Margaritis</u> <u>EMF Transcriptomics and Proteomics Research 2007-2012</u>
SECTION 6	<u>EVIDENCE FOR GENOTOXIC EFFECTS – RFR AND ELF DNA DAMAGE</u> Dr. Lai <u>2012 Supplement - Dr. Lai</u>
SECTION 7	<u>EVIDENCE FOR STRESS RESPONSE (STRESS PROTEINS)</u> Dr. Blank <u>2012 Supplement - Dr. Blank</u> <u>Evidence for Stress Response: EMF-DNA Interaction</u>
SECTION 8	<u>EVIDENCE FOR EFFECTS ON IMMUNE FUNCTION</u> Dr. Johansson <u>2012 Supplement - Dr. Grigoriev</u> <u>Immune System and EMF-RF</u>

- SECTION 9 EVIDENCE FOR EFFECTS ON NEUROLOGY AND BEHAVIOR
Dr. Lai

2012 Supplement - Dr. Lai
- SECTION 10 EFFECTS OF EMF FROM WIRELESS COMMUNICATION
UPON THE BLOOD-BRAIN BARRIER

2012 New Chapter - Dr. Salford, Dr. Nittby and Dr. Persson
- SECTION 11 EVIDENCE FOR BRAIN TUMORS AND ACOUSTIC NEUROMAS
Dr. Hardell, Dr. Hansson Mild and Dr. Kundi

2012 Supplement - Dr. Hardell, Dr. Hansson Mild, Mr. Carlberg
Use of Wireless Phones and Evidence for Increased Risk of Brain
Tumors

2012 Supplement - Dr. Kundi
Evidence for Brain Tumors (Epidemiological)
- SECTION 12 EVIDENCE FOR CHILDHOOD CANCERS (LEUKEMIA)
Dr. Kundi

2012 Replacement Chapter - Dr. Kundi
- SECTION 13 EVIDENCE FOR EFFECTS ON MELATONIN: ALZHEIMER'S
DISEASE AND BREAST CANCER
Dr. Davanipour and Dr. Sobel

2012 Replacement Chapter - Dr. Davanipour and Dr. Sobel
ELF Magnetic Field Exposure: Melatonin Production -
Alzheimer's Disease - Breast Cancer
- SECTION 14 EVIDENCE FOR BREAST CANCER PROMOTION
(Melatonin links in laboratory and cell studies)
Ms. Sage
- SECTION 15 EVIDENCE FOR DISRUPTION BY THE MODULATING SIGNAL
Dr. Blackman

2012 Supplement - Dr. Belyaev
Role of Physical and Biological Variables in Bioeffects of Non-
Thermal Microwaves for Reproducibility, Cancer Risk Assessment
and Safety Standards

SECTION 16 * PLAUSIBLE GENETIC AND METABOLIC MECHANISMS FOR BIOEFFECTS OF VERY WEAK ELF MAGNETIC FIELDS ON LIVING TISSUES

2012 New Chapter - Dr. Heroux and Dr. Ying Li

SECTION 17 EVIDENCE BASED ON EMF MEDICAL THERAPEUTICS
Ms. Sage

2012 Supplement - Dr. Liboff
Electromagnetic Medicine: Non-Inductive, Non-Thermal Modalities

SECTION 18 * FERTILITY AND REPRODUCTION EFFECTS OF EMF

2012 New Chapter - Dr. Behari and Dr. Paulraj Rajamani

SECTION 19 * FETAL AND NEONATAL EFFECTS OF EMF

2012 New Chapter - Dr. Bellieni and Dr. Pinto

SECTION 20 * FINDINGS IN AUTISM CONSISTENT WITH EMF AND RFR

2012 New Chapter - Dr. Herbert and Ms. Sage

SECTION 21 * MOBILE PHONE BASE STATIONS: WELL-BEING AND HEALTH
(not available at press date)

2012 New Chapter - Dr. Kundi

SECTION 22 * PRECAUTION IN ACTION: GLOBAL PUBLIC HEALTH EXAMPLES SINCE BIOINITIATIVE 2007

2012 New Chapter - Dr. Oberfeld

SECTION 23 THE PRECAUTIONARY PRINCIPLE

Mr. Gee

2012 Supplement - Mr. Gee
(not available at press date)

SECTION 24 KEY SCIENTIFIC EVIDENCE AND PUBLIC HEALTH POLICY RECOMMENDATIONS

Dr. Carpenter and Ms. Sage

2012 Supplement - Ms. Sage and Dr. Carpenter



SECTION 1

Summary for the Public

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Prepared for the BioInitiative Working Group
August 2007

Table of Contents

I. Summary for the Public

- A. Introduction
- B. Purpose of the Report
- C. Problems with Existing Public Health Standards (Safety Limits)

II. Summary of the Science

- A. Evidence for Cancer (Childhood Leukemia and Adult Cancers)
- B. Changes in the Nervous System and Brain Function
- C. Effect on Genes (DNA)
- D. Effects on Stress Proteins (Heat Shock Proteins)
- E. Effects on the Immune System
- F. Plausible Biological Mechanisms
- G. Another Way of Looking at EMFs: Therapeutic Uses

III. EMF Exposure and Prudent Public Health Planning

IV. Recommended Actions

- A. Defining new exposure standards for ELF
- B. Defining preventative actions for reduction in RF exposures

V. Conclusions

VI. References

I. SUMMARY FOR THE PUBLIC

A. Introduction

You cannot see it, taste it or smell it, but it is one of the most pervasive environmental exposures in industrialized countries today. Electromagnetic radiation (EMR) or electromagnetic fields (EMFs) are the terms that broadly describe exposures created by the vast array of wired and wireless technologies that have altered the landscape of our lives in countless beneficial ways. However, these technologies were designed to maximize energy efficiency and convenience; not with biological effects on people in mind. Based on new studies, there is growing evidence among scientists and the public about possible health risks associated with these technologies.

Human beings are bioelectrical systems. Our hearts and brains are regulated by internal bioelectrical signals. Environmental exposures to artificial EMFs can interact with fundamental biological processes in the human body. In some cases, this can cause discomfort and disease. Since World War II, the background level of EMF from electrical sources has risen exponentially, most recently by the soaring popularity of wireless technologies such as cell phones (two billion and counting in 2006), cordless phones, WI-FI and WI-MAX networks. Several decades of international scientific research confirm that EMFs are biologically active in animals and in humans, which could have major public health consequences.

In today's world, everyone is exposed to two types of EMFs: (1) extremely low frequency electromagnetic fields (ELF) from electrical and electronic appliances and power lines and (2) radiofrequency radiation (RF) from wireless devices such as cell phones and cordless phones, cellular antennas and towers, and broadcast transmission towers. In this report we will use the term EMFs when referring to all electromagnetic fields in general; and the terms ELF and RF when referring to the specific type of exposure. They are both types of non-ionizing radiation, which means that they do not have sufficient energy to break off electrons from their orbits around atoms and ionize (charge) the atoms, as do x-rays, CT scans, and other forms of ionizing radiation. A glossary and definitions are provided in Section 18 to assist you. Some handy definitions you will probably need when reading about ELF and RF in this summary section (the language for measuring it) are shown with the references for this section.

B. Purpose of the Report

This report has been written by 14 (fourteen) scientists, public health and public policy experts to document the scientific evidence on electromagnetic fields. Another dozen outside reviewers have looked at and refined the Report.

The purpose of this report is to assess scientific evidence on health impacts from electromagnetic radiation below current public exposure limits and evaluate what changes in these limits are warranted now to reduce possible public health risks in the future.

Not everything is known yet about this subject; but what is clear is that the existing public safety standards limiting these radiation levels in nearly every country of the world look to be thousands of times too lenient. Changes are needed.

New approaches are needed to educate decision-makers and the public about sources of exposure and to find alternatives that do not pose the same level of possible health risks, while there is still time to make changes.

A working group composed of scientists, researchers and public health policy professionals (The BioInitiative Working Group) has joined together to document the information that must be considered in the international debate about the adequacy (or inadequacy) of existing public exposure standards.

This Report is the product of an international research and public policy initiative to give an overview of what is known of biological effects that occur at low-intensity EMFs exposures (for both radiofrequency radiation RF and power-frequency ELF, and various forms of combined exposures that are now known to be bioactive). The Report examines the research and current standards and finds that these standards are far from adequate to protect public health.

Recognizing that other bodies in the United States, United Kingdom, Australia, many European Union and eastern European countries as well as the World Health Organization are actively debating this topic, the BioInitiative Working Group has conducted an independent science and public health policy review process. The report presents solid science on this issue, and makes recommendations to decision-makers and the public. Conclusions of the individual authors, and overall conclusions are given in Table 2-1 (BioInitiative Overall Summary Chart).

Eleven (11) chapters that document key scientific studies and reviews identifying low-intensity effects of electromagnetic fields have been written by members of the BioInitiative Working Group. Section 16 and 17 have been prepared by public health and policy experts. These sections discuss the standard of evidence which should be applied in public health planning, how the scientific information should be evaluated in the context of prudent public health policy, and identifies the basis for taking precautionary and preventative actions that are proportionate to the knowledge at hand. They also evaluate the evidence for ELF that leads to a recommendation for new public safety limits (not precautionary or preventative actions, as need is demonstrated).

Other scientific review bodies and agencies have reached different conclusions than we have by adopting standards of evidence so unreasonably high as to exclude any conclusions likely to lead to new public safety limits. Some groups are actually recommending a relaxation of the existing (and inadequate) standards. Why is this happening? One reason is that exposure limits for ELF and RF are developed by bodies of scientists and engineers that belong to professional societies who have traditionally developed recommendations; and then government agencies have adopted those recommendations. The standard-setting processes have little, if any, input from other stakeholders outside professional engineering and closely-related commercial interests. Often, the industry view of allowable risk and proof of harm is most influential, rather than what public health experts would determine is acceptable.

Main Reasons for Disagreement among Experts

- 1) Scientists and public health policy experts use very different definitions of the standard of evidence used to judge the science, so they come to different conclusions about what to do. Scientists do have a role, but it is not exclusive and other opinions matter.
- 2) We are all talking about essentially the same scientific studies, but use a different way of measuring when “enough is enough” or “proof exists”.
- 3) Some experts keep saying that all studies have to be consistent (turn out the same way every time) before they are comfortable saying an effect exists.
- 4) Some experts think that it is enough to look only at short-term, acute effects.
- 5) Other experts say that it is imperative we have studies over longer time (showing the effects of chronic exposures) since that is what kind of world we live in.
- 6) Some experts say that everyone, including the very young, the elderly, pregnant women, and people with illnesses have to be considered – others say only the average person (or in the case of RF, a six-foot tall man) matter.
- 7) There is no unexposed population, making it harder to see increased risk of diseases.
- 8) The lack of consensus about a single biological mechanism of action.
- 9) The strength of human epidemiological studies reporting risks from ELF and RF exposures, but animal studies don't show a strong toxic effect.
- 10) Vested interests have a substantial influence on the health debate.

Public Policy Decisions

Safety limits for public exposure to EMFs need to be developed on the basis of interaction among not only scientists, but also public health experts, public policy makers and the general public.

“In principle, the assessment of the evidence should combine with judgment based on other societal values, for example, costs and benefits, acceptability of risks, cultural preferences, etc. and result in sound and effective decision-making. Decisions on these matters are eventually taken as a function of the views, values and interests of the stakeholders participating in the process, whose opinions are then weighed depending on several factors. Scientific evidence perhaps carries, or should carry, relatively heavy weight, but grants no exclusive status; decisions will be evidence-based but will also be based on other factors.” (1)

The clear consensus of the BioInitiative Working Group members is that the existing public safety limits are inadequate for both ELF and RF.

These proposals reflect the evidence that a positive assertion of safety with respect to chronic exposure to low-intensity levels of ELF and RF cannot be made. As with many other standards for environmental exposures, these proposed limits may not be totally protective, but more stringent standards are not realistic at the present time. Even a small increased risk for cancer and neurodegenerative diseases translates into an enormous public health consequence. Regulatory action for ELF and preventative actions for RF are warranted at this time to reduce exposures and inform the public of the potential for increased risk; at what levels of chronic exposure these risks may be present; and what measures may be taken to reduce risks.

C. Problems with Existing Public Health Standards (Safety Limits)

Today's public exposure limits for telecommunications are based on the presumption that heating of tissue (for RF) or induced electric currents in the body (for ELF) are the only concerns when living organisms are exposed to RF. These exposures can create tissue heating that is well known to be harmful in even very short-term doses. As such, thermal limits do serve a purpose. For example, for people whose occupations require them to work around radar facilities or RF heat-sealers, or for people who install and service wireless antenna tower, thermally-based limits are necessary to prevent damage from heating (or, in the case of power-frequency ELF from induced current flow in tissues). In the past, scientists and engineers developed exposure standards for electromagnetic radiation based what we now believe are faulty assumptions that the right way to measure how much non-ionizing energy humans can tolerate (how much exposure) without harm is to measure only the heating of tissue (RF) or induced currents in the body (ELF).

In the last few decades, it has been established beyond any reasonable doubt that bioeffects and some adverse health effects occur at far lower levels of RF and ELF exposure where no heating (or induced currents) occurs at all; some effects are shown to occur at several hundred thousand times below the existing public safety limits where heating is an impossibility.

It appears it is the INFORMATION conveyed by electromagnetic radiation (rather than heat) that causes biological changes - some of these biological changes may lead to loss of wellbeing, disease and even death.

Effects occur at non-thermal or low-intensity exposure levels thousands of times below the levels that federal agencies say should keep the public safe. For many new devices operating with wireless technologies, the devices are exempt from any regulatory standards. The existing standards have been proven to be inadequate to control against harm from low-intensity, chronic exposures, based on any reasonable, independent assessment of the scientific literature. It means that an entirely new basis (a biological basis) for new exposure standards is needed. New standards need to take into account what we have learned about the effects of ELF and RF (all non-ionizing electromagnetic radiation and to design new limits based on biologically-

demonstrated effects that are important to proper biological function in living organisms. It is vital to do so because the explosion of new sources has created unprecedented levels of artificial electromagnetic fields that now cover all but remote areas of the habitable space on earth. Mid-course corrections are needed in the way we accept, test and deploy new technologies that expose us to ELF and RF in order to avert public health problems of a global nature.

Recent opinions by experts have documented deficiencies in current exposure standards. There is widespread discussion that thermal limits are outdated, and that biologically-based exposure standards are needed. Section 4 describes concerns expressed by WHO, 2007 in its ELF Health Criteria Monograph; the SCENIHR Report, 2006 prepared for the European Commission; the UK SAGE Report, 2007; the Health Protection Agency, United Kingdom in 2005; the NATO Advanced Research Workshop in 2005; the US Radiofrequency Interagency Working Group in 1999; the US Food and Drug Administration in 2000 and 2007; the World Health Organization in 2002; the International Agency for Cancer Research (IARC, 2001), the United Kingdom Parliament Independent Expert Group Report on Mobile Phones – Stewart Report, 2000) and others.

A pioneer researcher, the late Dr. Ross Adey, in his last publication in Bioelectromagnetic Medicine (P. Roche and M. Markov, eds. 2004) concluded:

“There are major unanswered questions about possible health risks that may arise from exposures to various man-made electromagnetic fields where these human exposures are intermittent, recurrent, and may extend over a significant portion of the lifetime of the individual.”

“Epidemiological studies have evaluated ELF and radiofrequency fields as possible risk factors for human health, with historical evidence relating rising risks of such factors as progressive rural electrification, and more recently, to methods of electrical power distribution and utilization in commercial buildings. Appropriate models describing these bioeffects are based in non-equilibrium thermodynamics, with nonlinear electrodynamics as an integral feature. Heating models, based in equilibrium thermodynamics, fail to explain an impressive new frontier of much greater significance. Though incompletely understood, tissue free radical interactions with magnetic fields may extend to zero field levels.” (2)

There may be no lower limit at which exposures do not affect us. Until we know if there is a lower limit below which bioeffects and adverse health impacts do not occur, it is unwise from a public health perspective to continue “business-as-usual” deploying new technologies that increase ELF and RF exposures, particularly involuntary exposures.

II. SUMMARY OF THE SCIENCE

A. Evidence for Cancer

1. Childhood Leukemia

The evidence that power lines and other sources of ELF are consistently associated with higher rates of childhood leukemia has resulted in the International Agency for Cancer Research (an arm of the World Health Organization) to classify ELF as a Possible Human Carcinogen (in the Group 2B carcinogen list). Leukemia is the most common type of cancer in children.

There is little doubt that exposure to ELF causes childhood leukemia.

The exposure levels for increased risk are quite low – just above background or ambient levels and much lower than current exposure limits. The existing ICNIRP limit is 1000 mG (904 mG in the US) for ELF. Increased risk for childhood leukemia starts at levels almost one thousand times below the safety standard. Leukemia risks for young boys are reported in one study to double at only 1.4 mG and above (7). Most other studies combine older children with younger children (0 to 16 years) so that risk levels do not reach statistical significance until exposure levels reach 2 mG or 3 mG. Although some reviews have combined studies of childhood leukemia in ways that indicate the risk level starts at 4 mG and above; this does not reflect many of the studies reporting elevated risks at the lower exposure levels of 2 mG and 3 mG.

2. Other Childhood Cancers

Other childhood cancers have been studied, including brain tumors, but not enough work has been done to know if there are risks, how high these risks might be or what exposure levels might be associated with increased risks. The lack of certainty about other childhood cancers should not be taken to signal the “all clear”; rather it is a lack of study.

The World Health Organization ELF Health Criteria Monograph No 322 (2007) says that other childhood cancers “cannot be ruled out”. (8)

There is some evidence that other childhood cancers may be related to ELF exposure but not enough studies have been done.

Several recent studies provide even stronger evidence that ELF is a risk factor for childhood leukemia and cancers later in life. In the first study (9), children who were recovering in high-ELF environments had poorer survival rates (a 450% increased risk of dying if the ELF fields were 3 mG and above). In the second study, children who were recovering in 2 mG and above ELF environments were 300% more likely to die than children exposed to 1 mG and below. In

this second study, children recovering in ELF environments between 1 and 2 mG also had poorer survival rates, where the increased risk of dying was 280%. (10) These two studies give powerful new information that ELF exposures in children can be harmful at levels above even 1 mG. The third study looked what risks for cancer a child would have later in life, if that child was raised in a home within 300 meters of a high-voltage electric power line. (11) For children who were raised for their first five years of life within 300 meters, they have a life-time risk that is 500% higher for developing some kinds of cancers.

Children who have leukemia and are in recovery have poorer survival rates if their ELF exposure at home (or where they are recovering) is between 1mG and 2 mG in one study; over 3 mG in another study.

Given the extensive study of childhood leukemia risks associated with ELF, and the relatively consistent findings that exposures in the 2 mG to 4 mG range are associated with increased risk to children, a 1 mG limit for habitable space is recommended for new construction. While it is difficult and expensive to retrofit existing habitable space to a 1 mG level, and is also recommended as a desirable target for existing residences and places where children and pregnant women may spend prolonged periods of time.

New ELF public exposure limits are warranted at this time, given the existing scientific evidence and need for public health policy intervention and prevention.

3. Brain Tumors and Acoustic Neuromas

Radiofrequency radiation from cell phone and cordless phone exposure has been linked in more than one dozen studies to increased risk for brain tumors and/or acoustic neuromas (a tumor in the brain on a nerve related to our hearing).

People who have used a cell phone for ten years or more have higher rates of malignant brain tumor and acoustic neuromas. It is worse if the cell phone has been used primarily on one side of the head.

For brain tumors, people who have used a cell phone for 10 years or longer have a 20% increase in risk (when the cell phone is used on both sides of the head). For people who have used a cell phone for 10 years or longer predominantly on one side of the head, there is a 200% increased risk of a brain tumor. This information relies on the combined results of many brain tumor/cell phone studies taken together (a meta-analysis of studies).

People who have used a cordless phone for ten years or more have higher rates of malignant brain tumor and acoustic neuromas. It is worse if the cordless phone has been used primarily on one side of the head.

The risk of brain tumor (high-grade malignant glioma) from cordless phone use is 220% higher (both sides of the head). The risk from use of a cordless phone is 470% higher when used mostly on only one side of the head.

For acoustic neuromas, there is a 30% increased risk with cell phone use at ten years and longer; and a 240% increased risk of acoustic neuroma when the cell phone is used mainly on one side of the head. These risks are based on the combined results of several studies (a meta-analysis of studies).

For use of cordless phones, the increased risk of acoustic neuroma is three-fold higher (310%) when the phone is mainly used on one side of the head.

The current standard for exposure to the emissions of cell phones and cordless phones is not safe considering studies reporting long-term brain tumor and acoustic neuroma risks.

Other indications that radiofrequency radiation can cause brain tumors comes from exposures to low-level RF other than from cell phone or cordless phone use. Studies of people who are exposed in their work (occupational exposure) show higher brain tumor rates as well. Kheifets (1995) reported a 10% to 20% increased risk of brain cancer for those employed in electrical occupations. This meta-analysis surveyed 29 published studies of brain cancer in relation to occupational EMFs exposure or work in electrical occupations. (6). The evidence for a link between other sources of RF exposure like working at a job with EMFs exposure is consistent with a moderately elevated risk of developing brain tumors.

4. Other Adult Cancers

There are multiple studies that show statistically significant relationships between occupational exposure and leukemia in adults (see Chapter 11), in spite of major limitations in the exposure assessment. A very recent study by Lowenthal et al. (2007) investigated leukemia in adults in relation to residence near to high-voltage power lines. While they found elevated risk in all adults living near to the high voltage power lines, they found an OR of 3.23 (95% CI = 1.26-8.29) for individuals who spent the first 15 years of life within 300 m of the power line. This study provides support for two important conclusions: adult leukemia is also associated with EMF exposure, and exposure during childhood increases risk of adult disease.

A significant excess risk for adult brain tumors in electrical workers and those adults with occupational EMF exposure was reported in a meta-analysis (review of many individual studies) by Kheifets et al., (1995). This is about the same size risk for lung cancer and secondhand smoke (US DHHS, 2006). A total of 29 studies with populations from 12 countries were included in this meta-analysis. The relative risk was reported as 1.16 (CI = 1.08 – 1.24) or a 16% increased risk

for all brain tumors. For gliomas, the risk estimate was reported to be 1.39 (1.07 – 1.82) or a 39% increased risk for those in electrical occupations. A second meta-analysis published by Kheifets et al., ((2001) added results of 9 new studies published after 1995. It reported a new pooled estimate (OR = 1.16, 1.08 – 1.01) that showed little change in the risk estimate overall from 1995.

The evidence for a relationship between exposure and breast cancer is relatively strong in men (Erren, 2001), and some (by no means all) studies show female breast cancer also to be elevated with increased exposure (see Chapter 12). Brain tumors and acoustic neuromas are more common in exposed persons (see Chapter 10). There is less published evidence on other cancers, but Charles et al. (2003) report that workers in the highest 10% category for EMF exposure were twice as likely to die of prostate cancer as those exposed at lower levels (OR 2.02, 95% CI = 1.34-3.04). Villeneuve et al. (2000) report statistically significant elevations of non-Hodgkin's lymphoma in electric utility workers in relation to EMF exposure, while Tynes et al. (2003) report elevated rates of malignant melanoma in persons living near to high voltage power lines. While these observations need replication, they suggest a relationship between exposure and cancer in adults beyond leukemia.

In total the scientific evidence for adult disease associated with EMF exposure is sufficiently strong for adult cancers that preventive steps are appropriate, even if not all reports have shown exactly the same positive relationship. This is especially true since many factors reduce our ability to see disease patterns that might be related to EMF exposure: there is no unexposed population for comparison, for example, and other difficulties in exposure assessment. The evidence for a relationship between EMF exposure and adult cancers and neurodegenerative diseases is sufficiently strong at present to merit preventive actions to reduce EMF exposure.

5. Breast Cancer

There is rather strong evidence from multiple areas of scientific investigation that ELF is related to breast cancer. Over the last two decades there have been numerous epidemiological studies (studies of human illness) on breast cancer in both men and women, although this relationship remains controversial among scientists. Many of these studies report that ELF exposures are related to increased risk of breast cancer (not all studies report such effects, but then, we do not expect 100% or even 50% consistency in results in science, and do not require it to take reasonable preventative action).

The evidence from studies on women in the workplace rather strongly suggests that ELF is a risk factor for breast cancer for women with long-term exposures of 10 mG and higher.

Breast cancer studies of people who work in relatively high ELF exposures (10 mG and above) show higher rates of this disease. Most studies of workers who are exposed to ELF have defined high exposure levels to be somewhere between 2 mG and 10 mG; however this kind of mixing of relatively low to relatively high ELF exposure just acts to dilute out real risk levels. Many of the occupational studies group exposures so that the highest group is exposed to 4 mG and above. What this means is that a) few people are exposed to much higher levels and b) illness patterns show up at relatively low ELF levels of 4 mG and above. This is another way of demonstrating

that existing ELF limits that are set at 933-1000 mG are irrelevant to the exposure levels reporting increased risks.

Laboratory studies that examine human breast cancer cells have shown that ELF exposure between 6 mG and 12 mG can interfere with protective effects of melatonin that fights the growth of these breast cancer cells. For a decade, there has been evidence that human breast cancer cells grow faster if exposed to ELF at low environmental levels. This is thought to be because ELF exposure can reduce melatonin levels in the body. The presence of melatonin in breast cancer cell cultures is known to reduce the growth of cancer cells. The absence of melatonin (because of ELF exposure or other reasons) is known to result in more cancer cell growth.

Laboratory studies of animals that have breast cancer tumors have been shown to have more tumors and larger tumors when exposed to ELF and a chemical tumor promoter at the same time. These studies taken together indicate that ELF is a likely risk factor for breast cancer, and that ELF levels of importance are no higher than many people are exposed to at home and at work. A reasonable suspicion of risk exists and is sufficient evidence on which to recommend new ELF limits; and to warrant preventative action.

Given the very high lifetime risks for developing breast cancer, and the critical importance of prevention; ELF exposures should be reduced for all people who are in high ELF environments for prolonged periods of time.

Reducing ELF exposure is particularly important for people who have breast cancer. The recovery environment should have low ELF levels given the evidence for poorer survival rates for childhood leukemia patients in ELF fields over 2 mG or 3 mG. Preventative action for those who may be at higher risk for breast cancer is also warranted (particularly for those taking tamoxifen as a way to reduce the risk of getting breast cancer, since in addition to reducing the effectiveness of melatonin, ELF exposure may also reduce the effectiveness of tamoxifen at these same low exposure levels). There is no excuse for ignoring the substantial body of evidence we already have that supports an association between breast cancer and ELF exposure; waiting for conclusive evidence is untenable given the enormous costs and societal and personal burdens caused by this disease.

Studies of human breast cancer cells and some animal studies show that ELF is likely to be a risk factor for breast cancer. There is supporting evidence for a link between breast cancer and exposure to ELF that comes from cell and animal studies, as well as studies of human breast cancers.

These are just some of the cancer issues to discuss. It may be reasonable now to make the assumption that all cancers, and other disease endpoints might be related to, or worsened by exposures to EMFs (both ELF and RF).

If one or more cancers are related, why would not all cancer risks be at issue? It can no longer be said that the current state of knowledge rules out or precludes risks to human health. The

enormous societal costs and impacts on human suffering by not dealing proactively with this issue require substantive public health policy actions; and actions of governmental agencies charged with the protection of public health to act on the basis of the evidence at hand.

B. Changes in the Nervous System and Brain Function

Exposure to electromagnetic fields has been studied in connection with Alzheimer's disease, motor neuron disease and Parkinson's disease. (4) These diseases all involve the death of specific neurons and may be classified as neurodegenerative diseases. There is evidence that high levels of amyloid beta are a risk factor for Alzheimer's disease, and exposure to ELF can increase this substance in the brain. There is considerable evidence that melatonin can protect the brain against damage leading to Alzheimer's disease, and also strong evidence that exposure to ELF can reduce melatonin levels. Thus it is hypothesized that one of the body's main protections against developing Alzheimer's disease (melatonin) is less available to the body when people are exposed to ELF. Prolonged exposure to ELF fields could alter calcium (Ca²⁺) levels in neurons and induce oxidative stress (4). It is also possible that prolonged exposure to ELF fields may stimulate neurons (particularly large motor neurons) into synchronous firing, leading to damage by the buildup of toxins.

Evidence for a relationship between exposure and the neurodegenerative diseases, Alzheimer's and amyotrophic lateral sclerosis (ALS), is strong and relatively consistent (see Chapter 12). While not every publication shows a statistically significant relationship between exposure and disease, ORs of 2.3 (95% CI = 1.0-5.1 in Qio et al., 2004), of 2.3 (95% CI = 1.6-3.3 in Feychting et al., 2003) and of 4.0 (95% CI = 1.4-11.7 in Hakansson et al., 2003) for Alzheimer's Disease, and of 3.1 (95% CI = 1.0-9.8 in Savitz et al., 1998) and 2.2 (95% CI = 1.0-4.7 in Hakansson et al., 2003) for ALS cannot be simply ignored.

Alzheimer's disease is a disease of the nervous system. There is strong evidence that long-term exposure to ELF is a risk factor for Alzheimer's disease.

Concern has also been raised that humans with epileptic disorders could be more susceptible to RF exposure. Low-level RF exposure may be a stressor based on similarities of neurological effects to other known stressors; low-level RF activates both endogenous opioids and other substances in the brain that function in a similar manner to psychoactive drug actions. Such effects in laboratory animals mimic the effects of drugs on the part of the brain that is involved in addiction.

Laboratory studies show that the nervous system of both humans and animals is sensitive to ELF and RF. Measurable changes in brain function and behavior occur at levels associated with new technologies including cell phone use. Exposing humans to cell phone radiation can change brainwave activity at levels as low as 0.1 watt per kilogram SAR (W/Kg)^{***} in comparison to the US allowable level of 1.6 W/Kg and the International Commission for Non-ionizing Radiation Protection (ICNIRP) allowable level of 2.0 W/Kg. It can affect memory and learning. It can affect normal brainwave activity. ELF and RF exposures at low levels are able to change behavior in animals.

There is little doubt that electromagnetic fields emitted by cell phones and cell phone use affect electrical activity of the brain.

Effects on brain function seem to depend in some cases on the mental load of the subject during exposure (the brain is less able to do two jobs well simultaneously when the same part of the brain is involved in both tasks). Some studies show that cell phone exposure speeds up the brain's activity level; but also that the efficiency and judgment of the brain are diminished at the same time. One study reported that teenage drivers had slowed responses when driving and exposed to cell phone radiation, comparable to response times of elderly people. Faster thinking does not necessarily mean better quality thinking.

Changes in the way in which the brain and nervous system react depend very much on the specific exposures. Most studies only look at short-term effects, so the long-term consequences of exposures are not known.

Factors that determine effects can depend on head shape and size, the location, size and shape of internal brain structures; thinness of the head and face; hydration of tissues; thickness of various tissues; dielectric constant of the tissues and so on. Age of the individual and state of health also appear to be important variables. Exposure conditions also greatly influence the outcome of studies, and can have opposite results depending on the conditions of exposure including frequency, waveform, orientation of exposure, duration of exposure, number of exposures, any pulse modulation of the signal, and when effects are measured (some responses to RF are delayed). There is large variability in the results of ELF and RF testing, which would be expected based on the large variability of factors that can influence test results. However, it is clearly demonstrated that under some conditions of exposure, the brain and nervous system functions of humans are altered. The consequence of long-term or prolonged exposures have not been thoroughly studied in either adults or in children.

The consequence of prolonged exposures to children, whose nervous systems continue to develop until late adolescence, is unknown at this time. This could have serious implications to adult health and functioning in society if years of exposure of the young to both ELF and RF result in diminished capacity for thinking, judgment, memory, learning, and control over behavior.

People who are chronically exposed to low-level wireless antenna emissions report symptoms such as problems in sleeping (insomnia), fatigue, headache, dizziness, grogginess, lack of concentration, memory problems, ringing in the ears (tinnitus), problems with balance and orientation, and difficulty in multi-tasking. In children, exposures to cell phone radiation have resulted in changes in brain oscillatory activity during some memory tasks. Although scientific studies as yet have not been able to confirm a cause-and-effect relationship; these complaints are

widespread and the cause of significant public concern in some countries where wireless technologies are fairly mature and widely distributed (Sweden, Denmark, France, Germany, Italy, Switzerland, Austria, Greece, Israel). For example, the roll-out of the new 3rd Generation wireless phones (and related community-wide antenna RF emissions in the Netherlands) caused almost immediate public complaints of illness.(5)

Conflicting results from those few studies that have been conducted may be based on the difficulty in providing non-exposed environments for testing to compare to environments that are intentionally exposed. People traveling to laboratories for testing are pre-exposed to a multitude of RF and ELF exposures, so they may already be symptomatic prior to actual testing. Also complicating this is good evidence that RF exposures testing behavioral changes show delayed results; effects are observed after termination of RF exposure. This suggests a persistent change in the nervous system that may be evident only after time has passed, so is not observed during a short testing period.

The effects of long-term exposure to wireless technologies including emissions from cell phones and other personal devices, and from whole-body exposure to RF transmissions from cell towers and antennas is simply not known yet with certainty. However, the body of evidence at hand suggests that bioeffects and health impacts can and do occur at exquisitely low exposure levels: levels that can be thousands of times below public safety limits.

The evidence reasonably points to the potential for serious public health consequences (and economic costs), which will be of global concern with the widespread public use of, and exposure to such emissions. Even a small increase in disease incidence or functional loss of cognition related to new wireless exposures would have a large public health, societal and economic consequences. Epidemiological studies can report harm to health only after decades of exposure, and where large effects can be seen across “average” populations; so these early warnings of possible harm should be taken seriously now by decision-makers.

C. Effects on Genes (DNA)

Cancer risk is related to DNA damage, which alters the genetic blueprint for growth and development. If DNA is damaged (the genes are damaged) there is a risk that these damaged cells will not die. Instead they will continue to reproduce themselves with damaged DNA, and this is one necessary pre-condition for cancer. Reduced DNA repair may also be an important part of this story. When the rate of damage to DNA exceeds the rate at which DNA can be repaired, there is the possibility of retaining mutations and initiating cancer. Studies on how ELF and RF may affect genes and DNA is important, because of the possible link to cancer. Even ten years ago, most people believed that very weak ELF and RF fields could not possibly have any effect at all on DNA and how cells work (or are damaged and cannot do their work properly). The argument was that these weak fields are do not possess enough energy (are not physically strong enough) to cause damage. However, there are multiple ways we already know about where energy is not the key factor in causing damage. For example, exposure to toxic chemicals can cause damage. Changing the balance of delicate biological processes, including

hormone balances in the body, can damage or destroy cells, and cause illness. In fact, many chronic diseases are directly related to this kind of damage that does not require any heating at all. Interference with cell communication (how cells interact) may either cause cancer directly or promote existing cancers to grow faster.

Using modern gene-testing techniques will probably give very useful information in the future about how EMFs targets and affects molecules in the body. At the gene level, there is some evidence now that EMFs (both ELF and RF) can cause changes in how DNA works. Laboratory studies have been conducted to see whether (and how) weak EMFs fields can affect how genes and proteins function. Such changes have been seen in some, but not all studies.

Small changes in protein or gene expression might be able to alter cell physiology, and might be able to cause later effects on health and well-being. The study of genes, proteins and EMFs is still in its infancy, however, by having some confirmation at the gene level and protein level that weak EMFs exposures do register changes may be an important step in establishing what risks to health can occur.

What is remarkable about studies on DNA, genes and proteins and EMFs is that there should be no effect at all if it were true that EMFs is too weak to cause damage. Scientists who believe that the energy of EMFs is insignificant and unlikely to cause harm have a hard time explaining these changes, so are inclined to just ignore them. The trouble with this view is that the effects are occurring. Not being able to explain these effects is not a good reason to consider them imaginary or unimportant.

The European research program (REFLEX) documented many changes in normal biological functioning in tests on DNA (3). The significance of these results is that such effects are directly related to the question of whether human health risks might occur, when these changes in genes and DNA happen. This large research effort produced information on EMFs effects from more than a dozen different researchers. Some of the key findings included:

"Gene mutations, cell proliferation and apoptosis are caused by or result in altered gene and protein expression profiles. The convergence of these events is required for the development of all chronic diseases." (3)

"Genotoxic effects and a modified expression of numerous genes and proteins after EMF exposure could be demonstrated with great certainty." (3)

"RF-EMF produced genotoxic effects in fibroblasts, HL-60 cells, granulosa cells of rats and neural progenitor cells derived from mouse embryonic stem cells." (Participants 2, 3 and 4). (3)

"Cells responded to RF exposure between SAR levels of 0.3 and 2 W/Kg with a significant increase in single- and double-strand DNA breaks and in micronuclei frequency." (Participants 2, 3 and 4). (3)

"In HL-60 cells an increase in intracellular generation of free radicals accompanying RF-EMF exposure could clearly be demonstrated." (Participant 2). (3)

"The induced DNA damage was not based on thermal effects and arouses consideration about the environmental safety limits for ELF-EMF exposure." (3)

“The effects were clearly more pronounced in cells from older donors, which could point to an age-related decrease of DNA repair efficiency of ELF-EMF induced DNA strand breaks.” (3)

Both ELF and RF exposures can be considered genotoxic (will damage DNA) under certain conditions of exposure, including exposure levels that are lower than existing safety limits.

D. Effects on Stress Proteins (Heat Shock Proteins)

In nearly every living organism, there is a special protection launched by cells when they are under attack from environmental toxins or adverse environmental conditions. This is called a stress response, and what are produced are stress proteins (also known as heat shock proteins). Plants, animals and bacteria all produce stress proteins to survive environmental stressors like high temperatures, lack of oxygen, heavy metal poisoning, and oxidative stress (a cause of premature aging). We can now add ELF and RF exposures to this list of environmental stressors that cause a physiological stress response.

Very low-level ELF and RF exposures can cause cells to produce stress proteins, meaning that the cell recognizes ELF and RF exposures as harmful. This is another important way in which scientists have documented that ELF and RF exposures can be harmful, and it happens at levels far below the existing public safety standards.

An additional concern is that if the stress goes on too long, the protective effect is diminished. There is a reduced response if the stress goes on too long, and the protective effect is reduced. This means the cell is less protected against damage, and it is why prolonged or chronic exposures may be quite harmful, even at very low intensities.

The biochemical pathway that is activated is the same for ELF and for RF exposures, and it is non-thermal (does not require heating or induced electrical currents, and thus the safety standards based on protection from heating are irrelevant and not protective). ELF exposure levels of only 5 to 10 mG have been shown to activate the stress response genes (Table 2, Section 6). The specific absorption rate or SAR is not the appropriate measure of biological threshold or dose, and should not be used as the basis for a safety standard, since SAR only regulates against thermal damage.

E. Effects on the Immune System

The immune system is another defense we have against invading organisms (viruses, bacteria, and other foreign molecules). It protects us against illness, infectious diseases, and tumor cells.

There are many different kinds of immune cells; each type of cell has a particular purpose, and is launched to defend the body against different kinds of exposures that the body determines might be harmful.

There is substantial evidence that ELF and RF can cause inflammatory reactions, allergy reactions and change normal immune function at levels allowed by current public safety standards.

The body's immune defense system senses danger from ELF and RF exposures, and targets an immune defense against these fields, much like the body's reaction in producing stress proteins. These are additional indicators that very low intensity ELF and RF exposures are a) recognized by cells and b) can cause reactions as if the exposure is harmful. Chronic exposure to factors that increase allergic and inflammatory responses on a continuing basis are likely to be harmful to health. Chronic inflammatory responses can lead to cellular, tissue and organ damage over time. Many chronic diseases are thought to be related to chronic problems with immune system function.

The release of inflammatory substances, such as histamine, are well-known to cause skin reactions, swelling, allergic hypersensitivity and other conditions that are normally associated with some kind of defense mechanism. The human immune system is part of a general defense barrier that protects against harmful exposures from the surrounding environment. When the immune system is aggravated by some kind of attack, there are many kinds of immune cells that can respond. Anything that triggers an immune response should be carefully evaluated, since chronic stimulation of the immune system may over time impair the system's ability to respond in the normal fashion.

Measurable physiological changes (mast cell increases in the skin, for example that are markers of allergic response and inflammatory cell response) are triggered by ELF and RF at very low intensities. Mast cells, when activated by ELF or RF, will break (degranulate) and release irritating chemicals that cause the symptoms of allergic skin reactions.

There is very clear evidence that exposures to ELF and RF at levels associated with cell phone use, computers, video display terminals, televisions, and other sources can cause these skin reactions. Changes in skin sensitivity have been measured by skin biopsy, and the findings are remarkable. Some of these reactions happen at levels equivalent to those of wireless technologies in daily life. Mast cells are also found in the brain and heart, perhaps targets of immune response by cells responding to ELF and RF exposures, and this might account for some of the other symptoms commonly reported (headache, sensitivity to light, heart arrhythmias and other cardiac symptoms). Chronic provocation by exposure to ELF and RF can lead to immune dysfunction, chronic allergic responses, inflammatory diseases and ill health if they occur on a continuing basis over time.

These clinical findings may account for reports of persons with electrical hypersensitivity, which is a condition where there is intolerance for any level of exposure to ELF and/or RF. Although there is not yet a substantial scientific assessment (under controlled conditions, if that is even possible); anecdotal reports from many countries show that estimates range from 3% to perhaps 5% of populations, and it is a growing problem. Electrical hypersensitivity, like multiple

chemical sensitivity, can be disabling and require the affected person to make drastic changes in work and living circumstances, and suffer large economic losses and loss of personal freedom. In Sweden, electrohypersensitivity (EHS) is officially recognized as fully functional impairment (i.e., it is not regarded as a disease – see Section 6, Appendix A).

F. Plausible Biological Mechanisms

Plausible biological mechanisms are already identified that can reasonably account for most biological effects reported for exposure to RF and ELF at low-intensity levels (oxidative stress and DNA damage from free radicals leading to genotoxicity; molecular mechanisms at very low energies are plausible links to disease, e.g., effect on electron transfer rates linked to oxidative damage, DNA activation linked to abnormal biosynthesis and mutation). It is also important to remember that traditional public health and epidemiological determinations do not require a proven mechanism before inferring a causal link between EMFs exposure and disease (12). Many times, proof of mechanism is not known before wise public health responses are implemented.

“Obviously, melatonin’s ability to protect DNA from oxidative damage has implications for many types of cancer, including leukemia, considering that DNA damage due to free radicals is believed to be the initial oncogenic event in a majority of human cancers [Cerutti et al., 1994]. In addition to cancer, free radical damage to the central nervous system is a significant component of a variety of neurodegenerative diseases of the aged including Alzheimer’s disease and Parkinsonism. In experimental animal models of both of these conditions, melatonin has proven highly effective in forestalling their onset, and reducing their severity [Reiter et al., 2001].” (13)

Oxidative stress through the action of free radical damage to DNA is a plausible biological mechanism for cancer and diseases that involve damage from ELF to the central nervous system.

G. Another Way of Looking at EMFs: Therapeutic Uses

Many people are surprised to learn that certain kinds of EMFs treatments actually can heal. These are medical treatments that use EMFs in specific ways to help in healing bone fractures, to heal wounds to the skin and underlying tissues, to reduce pain and swelling, and for other post-surgical needs. Some forms of EMFs exposure are used to treat depression.

EMFs have been shown to be effective in treating conditions of disease at energy levels far below current public exposure standards. This leads to the obvious question. How can scientists dispute the harmful effects of EMF exposures while at the same time using forms of EMF treatment that are proven to heal the body?

Medical conditions are successfully treated using EMFs at levels below current public safety standards, proving another way that the body recognizes and responds to low-intensity EMF signals. Otherwise, these medical treatments could not work. The FDA has approved EMFs medical treatment devices, so is clearly aware of this paradox.

Random exposures to EMFs, as opposed to EMFs exposures done with clinical oversight, could lead to harm just like the unsupervised use of pharmaceutical drugs. This evidence forms a strong warning that indiscriminate EMF exposure is probably a bad idea.

No one would recommend that drugs used in medical treatments and prevention of disease be randomly given to the public, especially to children. Yet, random and involuntary exposures to EMFs occur all the time in daily life.

The consequence of multiple sources of EMFs exposures in daily life, with no regard to cumulative exposures or to potentially harmful combinations of EMFs exposures means several things. First, it makes it very difficult to do clinical studies because it is almost impossible to find anyone who is not already exposed. Second, people with and without diseases have multiple and overlapping exposures → this will vary from person to person.

Just as ionizing radiation can be used to effectively diagnose disease and treat cancer, it is also a cause of cancer under different exposure conditions. Since EMFs are both a cause of disease, and also used for treatment of disease, it is vitally important that public exposure standards reflect our current understanding of the biological potency of EMF exposures, and develop both new public safety limits and measures to prevent future exposures.

III. EMF EXPOSURE AND PRUDENT PUBLIC HEALTH PLANNING

- The scientific evidence is sufficient to warrant regulatory action for ELF; and it is substantial enough to warrant preventative actions for RF.
- The standard of evidence for judging the emerging scientific evidence necessary to take action should be proportionate to the impacts on health and well-being
- The exposures are widespread.
- Widely accepted standards for judging the science are used in this assessment.

Public exposure to electromagnetic radiation (power-line frequencies, radiofrequency and microwave) is growing exponentially worldwide. There is a rapid increase in electrification in developing countries, even in rural areas. Most members of society now have and use cordless phones, cellular phones, and pagers. In addition, most populations are also exposed to antennas in communities designed to transmit wireless RF signals. Some developing countries have even given up running land lines because of expense and the easy access to cell phones. Long-term and cumulative exposure to such massively increased RF has no precedent in human history. Furthermore, the most pronounced change is for children, who now routinely spend hours each day on the cell phone. Everyone is exposed to a greater or lesser extent. No one can avoid exposure, since even if they live on a mountain-top without electricity there will likely be exposure to communication-frequency RF exposure. Vulnerable populations (pregnant women, very young children, elderly persons, the poor) are exposed to the same degree as the general population. Therefore it is imperative to consider ways in which to evaluate risk and reduce exposure. Good public health policy requires preventative action proportionate to the potential risk of harm and the public health consequence of taking no action.

IV. RECOMMENDED ACTIONS

A. Defining new exposure standards for ELF

This chapter concludes that new ELF limits are warranted based on a public health analysis of the overall existing scientific evidence. The public health view is that new ELF limits are needed now. They should reflect environmental levels of ELF that have been demonstrated to increase risk for childhood leukemia, and possibly other cancers and neurological diseases. ELF limits should be set below those exposure levels that have been linked in childhood leukemia studies to increased risk of disease, plus an additional safety factor. It is no longer acceptable to build new power lines and electrical facilities that place people in ELF environments that have been determined to be risky. These levels are in the 2 to 4 milligauss* (mG) range, not in the 10s of mG or 100s of mG. The existing ICNIRP limit is 1000 mG (904 mG in the US) for ELF is outdated and based on faulty assumptions. These limits are can no longer be said to be protective of public health and they should be replaced. A safety buffer or safety factor should also be applied to a new, biologically-based ELF limit, and the conventional approach is to add a safety factor lower than the risk level.

While new ELF limits are being developed and implemented, a reasonable approach would be a 1 mG planning limit for habitable space adjacent to all new or upgraded power lines and a 2 mG limit for all other new construction. It is also recommended for that a 1 mG limit be established for existing habitable space for children and/or women who are pregnant (because of the possible link between childhood leukemia and *in utero* exposure to ELF). This recommendation is based on the assumption that a higher burden of protection is required for children who cannot protect themselves, and who are at risk for childhood leukemia at rates that are traditionally high enough to trigger regulatory action. This situation in particular warrants extending the 1 mG limit to existing occupied space. "Establish" in this case probably means formal public advisories from relevant health agencies. While it is not realistic to reconstruct all existing electrical distribution systems, in the short term; steps to reduce exposure from these existing systems need to be initiated, especially in places where children spend time, and should be encouraged. These limits should reflect the exposures that are commonly associated with increased risk of child hood leukemia (in the 2 to 5 mG range for all children, and over 1.4 mG for children age 6 and younger). Nearly all of the occupational studies for adult cancers and neurological diseases

report their highest exposure category is 4 mG and above, so that new ELF limits should target the exposure ranges of interest, and not necessarily higher ranges.

Avoiding chronic ELF exposure in schools, homes and the workplace above levels associated with increased risk of disease will also avoid most of the possible bioactive parameters of ELF discussed in the relevant literature.

B. Defining preventative actions for reduction in RF exposures

Given the scientific evidence at hand (Chapter 17), the rapid deployment of new wireless technologies that chronically expose people to pulsed RF at levels reported to cause bioeffects, which in turn, could reasonably be presumed to lead to serious health impacts, is of public health concern. Section 17 summarizes evidence that has resulted in a public health recommendation that preventative action is warranted to reduce or minimize RF exposures to the public. There is suggestive to strongly suggestive evidence that RF exposures may cause changes in cell membrane function, cell communication, cell metabolism, activation of proto-oncogenes and can trigger the production of stress proteins at exposure levels below current regulatory limits. Resulting effects can include DNA breaks and chromosome aberrations, cell death including death of brain neurons, increased free radical production, activation of the endogenous opioid system, cell stress and premature aging, changes in brain function including memory loss, retarded learning, slower motor function and other performance impairment in children, headaches and fatigue, sleep disorders, neurodegenerative conditions, reduction in melatonin secretion and cancers (Chapters 5, 6, 7, 8, 9, 10, and 12).

As early as 2000, some experts in bioelectromagnetics promoted a $0.1 \mu\text{W}/\text{cm}^2$ limit (which is 0.614 Volts per meter) for ambient outdoor exposure to pulsed RF, so generally in cities, the public would have adequate protection against involuntary exposure to pulsed radiofrequency (e.g., from cell towers, and other wireless technologies). The Salzburg Resolution of 2000 set a target of $0.1 \mu\text{W}/\text{cm}^2$ (or 0.614 V/m) for public exposure to pulsed radiofrequency. Since then, there are many credible anecdotal reports of unwellness and illness in the vicinity of wireless transmitters (wireless voice and data communication antennas) at lower levels. Effects include sleep disruption, impairment of memory and concentration, fatigue, headache, skin disorders,

visual symptoms (floaters), nausea, loss of appetite, tinnitus, and cardiac problems (racing heartbeat). There are some credible articles from researchers reporting that cell tower -level RF exposures (estimated to be between 0.01 and 0.5 $\mu\text{W}/\text{cm}^2$) produce ill-effects in populations living up to several hundred meters from wireless antenna sites.

This information now argues for thresholds or guidelines that are substantially below current FCC and ICNIPR standards for whole body exposure. Uncertainty about how low such standards might have to go to be prudent from a public health standpoint should not prevent reasonable efforts to respond to the information at hand. No lower limit for bioeffects and adverse health effects from RF has been established, so the possible health risks of wireless WLAN and WI-FI systems, for example, will require further research and no assertion of safety at any level of wireless exposure (chronic exposure) can be made at this time. The lower limit for reported human health effects has dropped 100-fold below the safety standard (for mobile phones and PDAs); 1000- to 10,000-fold for other wireless (cell towers at distance; WI-FI and WLAN devices). The entire basis for safety standards is called into question, and it is not unreasonable to question the safety of RF at any level.

A cautionary target level for pulsed RF exposures for ambient wireless that could be applied to RF sources from cell tower antennas, WI-FI, WI-MAX and other similar sources is proposed. The recommended cautionary target level is 0.1 microwatts per centimeter squared ($\mu\text{W}/\text{cm}^2$)** (or 0.614 Volts per meter or V/m)** for pulsed RF where these exposures affect the general public; this advisory is proportionate to the evidence and in accord with prudent public health policy. A precautionary limit of 0.1 $\mu\text{W}/\text{cm}^2$ should be adopted for outdoor, cumulative RF exposure. This reflects the current RF science and prudent public health response that would reasonably be set for pulsed RF (ambient) exposures where people live, work and go to school. This level of RF is experienced as whole-body exposure, and can be a chronic exposure where there is wireless coverage present for voice and data transmission for cell phones, pagers and PDAs and other sources of radiofrequency radiation. An outdoor precautionary limit of 0.1 $\mu\text{W}/\text{cm}^2$ would mean an even lower exposure level inside buildings, perhaps as low as 0.01 $\mu\text{W}/\text{cm}^2$. Some studies and many anecdotal reports on ill health have been reported at lower levels than this; however, for the present time, it could prevent some of the most disproportionate burdens placed on the public nearest to such installations. Although this RF target level does not preclude further rollout of WI-FI technologies, we also recommend that wired alternatives to WI-FI be implemented, particularly in schools and libraries so that children are not subjected to

elevated RF levels until more is understood about possible health impacts. This recommendation should be seen as an interim precautionary limit that is intended to guide preventative actions; and more conservative limits may be needed in the future.

Broadcast facilities that chronically expose nearby residents to elevated RF levels from AM, FM and television antenna transmission are also of public health concern given the potential for very high RF exposures near these facilities (antenna farms). RF levels can be in the 10s to several 100's of $\mu\text{W}/\text{cm}^2$ in residential areas within half a mile of some broadcast sites (for example, Lookout Mountain, Colorado and Awbrey Butte, Bend, Oregon). Such facilities that are located in, or expose residential populations and schools to elevated levels of RF will very likely need to be re-evaluated for safety.

For emissions from wireless devices (cell phones, personal digital assistant or PDA devices, etc) there is enough evidence for increased risk of brain tumors and acoustic neuromas now to warrant intervention with respect to their use. Redesign of cell phones and PDAs could prevent direct head and eye exposure, for example, by designing new units so that they work only with a wired headset or on speakerphone mode.

These effects can reasonably be presumed to result in adverse health effects and disease with chronic and uncontrolled exposures, and children may be particularly vulnerable. The young are also largely unable to remove themselves from such environments. Second-hand radiation, like second-hand smoke is an issue of public health concern based on the evidence at hand.

V. CONCLUSIONS

- We cannot afford ‘business as usual’ any longer. It is time that planning for new power lines and for new homes, schools and other habitable spaces around them is done with routine provision for low-ELF environments. The business-as-usual deployment of new wireless technologies is likely to be risky and harder to change if society does not make some educated decisions about limits soon. Research must continue to define what levels of RF related to new wireless technologies are acceptable; but more research should not prevent or delay substantive changes today that might save money, lives and societal disruption tomorrow.
- New regulatory limits for ELF are warranted. ELF limits should be set below those exposure levels that have been linked in childhood leukemia studies to increased risk of disease, plus an additional safety factor. It is no longer acceptable to build new power lines and electrical facilities that place people in ELF environments that have been determined to be risky (at levels generally at 2 mG and above).
- While new ELF limits are being developed and implemented, a reasonable approach would be a 1 mG planning limit for habitable space adjacent to all new or upgraded power lines and a 2 mG limit for all other new construction. It is also recommended for that a 1 mG limit be established for existing habitable space for children and/or women who are pregnant. This recommendation is based on the assumption that a higher burden of protection is required for children who cannot protect themselves, and who are at risk for childhood leukemia at rates that are traditionally high enough to trigger regulatory action. This situation in particular warrants extending the 1 mG limit to existing occupied space. "Establish" in this case probably means formal public advisories from relevant health agencies.
- While it is not realistic to reconstruct all existing electrical distributions systems, in the short term; steps to reduce exposure from these existing systems need to be initiated, especially in places where children spend time, and should be encouraged.
- A precautionary limit of 0.1 ($\mu\text{W}/\text{cm}^2$ (which is also 0.614 Volts per meter) should be adopted for outdoor, cumulative RF exposure. This reflects the current RF science and prudent public health response that would reasonably be set for pulsed RF (ambient) exposures where people

live, work and go to school. This level of RF is experienced as whole-body exposure, and can be a chronic exposure where there is wireless coverage present for voice and data transmission for cell phones, pagers and PDAs and other sources of radiofrequency radiation. Some studies and many anecdotal reports on ill health have been reported at lower levels than this; however, for the present time, it could prevent some of the most disproportionate burdens placed on the public nearest to such installations. Although this RF target level does not preclude further rollout of WI-FI technologies, we also recommend that wired alternatives to WI-FI be implemented, particularly in schools and libraries so that children are not subjected to elevated RF levels until more is understood about possible health impacts. This recommendation should be seen as an interim precautionary limit that is intended to guide preventative actions; and more conservative limits may be needed in the future.

VI. References

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Some Quick Definitions for Units of Measurement of ELF and RF

***Milligauss (mG)**

A milligauss is a measure of ELF intensity and is abbreviated mG. This is used to describe electromagnetic fields from appliances, power lines, interior electrical wiring.

****Microwatts per centimeter squared ($\mu\text{W}/\text{cm}^2$)**

Radiofrequency radiation in terms of power density is measured in microwatts per centimeter squared and abbreviated ($\mu\text{W}/\text{cm}^2$). It is used when talking about emissions from wireless facilities, and when describing ambient RF in the environment. The amount of allowable RF near a cell tower is 1000 $\mu\text{W}/\text{cm}^2$ for some cell phone frequencies, for example.

*****Specific Absorption Rate (SAR is measured in watts per kilogram or W/Kg)**

SAR stands for specific absorption rate. It is a calculation of how much RF energy is absorbed into the body, for example when a cell phone or cordless phone is pressed to the head. SAR is expressed in watts per kilogram of tissue (W/Kg). The amount of allowable energy into 1 gram of brain tissue from a cell phone is 1.6 W/Kg in the US. For whole body exposure, the exposure is 0.8 W/Kg averaged over 30 minutes for the general public. International standards in most countries are similar, but not exactly the same.

Table 1-1 BioInitiative Report Overall Conclusions

<p>OVERALL SUMMARY OF CONCLUSIONS</p> <ul style="list-style-type: none">• The existing ICNIRP and FCC limits for public and occupational exposure to ELF and RF are insufficiently protective of public health.• Biologically-based public and occupational exposure standards for extra-low frequency and radiofrequency radiation are recommended to address bioeffects and potential adverse health effects of chronic exposure to ELF and RF. These effects are now widely reported to occur at exposure levels significantly below most current national and international limits.• A biologically-based exposure limit is one that is protective against ELF and RF intensity and modulation factors which, with chronic exposure, can reasonably be presumed to result in significant impacts to health and well-being.• Research is needed (but should not delay) regulatory action for ELF and <u>substantive preventative action</u> for RF proportionate to potential health and wellbeing risks from chronic exposure.• A biologically-based exposure limit should reflect current scientific knowledge of bioeffects and health effects, and impose new limits based on preventative action as defined by the Precautionary Principle (EEA, 2001).• Biologically-based exposure standards shall be protective against exposures levels of ELF and RF that affect or change normal biological functioning of organisms (humans). They shall not be based solely on energy absorption or thermal levels of energy input, or resulting tissue heating. They shall be protective against chronic exposure responses.• The existing standards are based on thermal (heating) limits, and do not address non-thermal (or low-intensity) exposures which are widely reported to cause bioeffects, some likely leading to adverse health effects with chronic exposure.• Biological effects may include both potential adverse health effects and loss of homeostasis and well-being.• Biologically-based exposure standards are needed to prevent disruption of normal body processes. Effects are reported for DNS damage (genotoxicity that is directly linked to integrity of the human genome), cellular communication, cellular metabolism and repair, cancer surveillance within the body; and for protection against cancer and neurological diseases. Also reported are neurological effects including impairment of sleep and sleep architecture, cognitive function and memory; depression; cardiac effects; pathological leakage of the blood-brain barrier; and impairment of normal immune function, fertility and reproduction.• Frequency, intensity, exposure duration, and the number of exposure episodes can affect the response, and these factors can interact with each other to produce different effects. In addition, in order to understand the biological consequences of EMF exposure, one must know whether the effect is cumulative, whether compensatory responses result, and when homeostasis will break down.• Plausible biological mechanisms that can account for genotoxicity (DNA damage) are already well known (oxidative damage via free-radical actions) although it should also be said that there is not yet proof. <i>However, proof of mechanism is not required to set prudent public health policy, nor is it mandatory to set new guidelines or limits if adverse health effects occur at lower-than-existing IEEE and ICNIRP standards.</i>
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Table 1-1 BioInitiative Report Overall Conclusions

<p>OVERALL SUMMARY OF CONCLUSIONS (continued)</p> <ul style="list-style-type: none">• The SCENIHR report (2007) states that “for breast cancer and cardiovascular disease, recent research has indicated that an association with EMF is unlikely.” The WHO ELF Health Criteria Monograph (2007) states “The evidence does not support an association between ELF exposure and cardiovascular disease” and “(T)he evidence for breast cancer was also considered to be effectively negative, while for other diseases it was judged to be inadequate.” Neither conclusion is supported by any finding by IARC that would classify EMF as Class 4 (Not A Carcinogen), so it is premature for either group to dismiss the evidence for EMF as a potential risk factor for either breast cancer or for cardiovascular disease.• The standard for taking action should be precautionary; action should not be deferred while waiting for final proof or causal evidence to be established that EMF is harmful to health and well-being.• There is great public concern over increasing levels of involuntary exposure to radiofrequency and ELF-modulated radiofrequency exposures from new wireless technologies; there is widespread public resistance to radiofrequency and extra-low frequency radiation exposures which are allowable under current, thermally-based exposure standards.• There is inadequate warning and notice to the public about possible risks from wireless technologies in the marketplace, which is resulting in adoption and use of technologies that may have adverse health consequences which are still unknown to the public. There is no “informed consent”.• No positive assertion of safety can be made by governments that continue to support and enforce exposure limits for RF and ELF based on ICNIRP or IEEE criteria (or the equivalent). Governments that are considering proposals to relax existing RF and ELF standards should reject these proposals given the weight of scientific evidence that is available; and the clear disconnect between existing public safety limits and their responsibility to provide safe and healthful living environments for all segments of affected populations.

<p>Section 5 Genotoxicity Based on Proteomics</p> <ul style="list-style-type: none">• EMF exposure can change gene and/or protein expression in certain types of cells, even at intensities lower than ICNIRP recommended values.• The biological consequences of most of the changed genes/proteins are still unclear, and need to be further explored.• The EMF research community should pay equal attention to the negative reports as to the positive ones. Not only the positive findings need to be replicated, all the negative ones are also needed to be validated.• The IEEE and WHO data bases do not include the majority of ELF studies (only 6 of 14 in the WHO; 0 of 16 in IEEE); they do include the majority of the RF studies (14 of 16).
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Table 1-1 BioInitiative Report Overall Conclusions

<p>Section 6 Genotoxicity (DNA Damage from RF and ELF)</p> <ul style="list-style-type: none">• Toxicity to the genome can lead to a change in cellular functions, cancer, and cell death. One can conclude that under certain conditions of exposure RF is genotoxic. Data available are mainly applicable only to cell phone radiation exposure. One study reports that RF at levels equivalent to the vicinity of base stations and RF- transmission towers is genotoxic and could cause DNA damage (Phillips et al., 1998).• RF may be considered genotoxic (cause DNA damage). Of 28 total studies on radiofrequency radiation (RF) and DNA damage, 14 studies reported effects (50%) and 14 reported no significant effect (50%). Of 29 total studies on radiofrequency radiation and micronucleation, 16 studies reported effects (55%) and 13 reported no significant effect (45%). Of 21 total studies on chromosome and genome damage from radiofrequency radiation, 13 studies (62%) reported effects and 8 studies (38%) reported no significant effects.• During cell phone use, a relatively constant mass of tissue in the brain is exposed to radiation at relatively high intensity (peak SAR of 4 - 8 W/kg). Several studies have reported DNA damage at lower than 4 W/kg.• Since critical genetic mutations in one single cell are sufficient to lead to cancer and there are millions of cells in a gram of tissue, <i>it is inconceivable</i> that the base of the IEEE SAR standard was changed from averaged over 1 gram of tissue to 10 grams.• Frequency, intensity, exposure duration, and the number of exposure episodes can affect the response, and these factors can interact with each other to produce different consequences. In order to understand the biological consequence of exposure, one must understand whether the effect is cumulative, whether compensatory responses result and when homeostasis will break down. The choice of cell type or organism studied can also influence the outcome.• Extremely-low frequency (ELF) has also been shown to be genotoxic and cause DNA damage. Of 41 relevant studies of genotoxicity and ELF exposure, 27 studies (66%) report DNA damage and 14 studies (44%) report no significant effect.
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Table 1-1 BioInitiative Report Overall Conclusions

<p>Section 7: Stress Response</p> <ul style="list-style-type: none">• Scientific research on stress proteins has shown that the public is not being protected from potential damage that can be caused by exposure to EMF, both power frequency (ELF) and radio frequency (RF).• Cells react to an EMF as potentially harmful by producing stress proteins (heat shock proteins or hsp).• Direct interaction of ELF and RF with DNA has been documented and both activate the synthesis of stress proteins.• The biochemical pathway that is activated is the same pathway in both ELF and RF and it is non-thermal.• Many biological systems are affected by EMFs (meaning both ELF and RF trigger stress proteins).• Many frequencies are active. Field strength and exposure duration thresholds are very low.• Molecular mechanisms at very low energies are plausible links to disease (e.g., effect on electron transfer rates linked to oxidative damage, DNA activation linked to abnormal biosynthesis and mutation). Cells react to an EMF as potentially harmful.• Many lines of research now point to changes in DNA electron transfer as a plausible mechanism of action as a result of non-thermal ELF and RF.• The same biological reaction (production of stress proteins) to an EMF can be activated in more than one division of the EM spectrum.• Direct interaction of ELF and RF with DNA has been documented and both activate the synthesis of stress proteins.• Thresholds triggering stress on biological systems occur at environment levels on the order of 0.5 to 1.0 μT for ELF.• DNA damage (e.g., strand breaks), a cause of cancer, occurs at levels of ELF and RF that are below the safety limits. Also, there is no protection against cumulative effects stimulated by different parts of the EM spectrum.• The scientific basis for EMF safety limits is flawed when the same biological mechanisms are activated in ELF and RF ranges at vastly different levels of the Specific Absorption Rate (SAR). Activation of DNA to synthesize stress proteins (the stress response) is stimulated in the ELF at a non-thermal SAR level that is over a billion times lower than the same process activated by RF at the thermal level.• There is a need for a biological standard to replace the thermal standard and to also protect against cumulative effects across the EM spectrum.• Based on studies of stress proteins, the specific absorption rate (SAR) is not the appropriate measure of biological threshold or dose, and should not be used as a basis for a safety standard since it regulates against thermal effects only.

Table 1-1 BioInitiative Report Overall Conclusions

<p>Section 8 Effects on Immune Function</p> <ul style="list-style-type: none">• Both human and animal studies report large immunological changes with exposure to environmental levels of electromagnetic fields (EMFs). Some of these exposure levels are equivalent to those of e.g. wireless technologies in daily life.• Measurable physiological changes (mast cells increases, for example) that are bedrock indicators of allergic response and inflammatory conditions are stimulated by EMF exposures.• Chronic exposure to such factors that increase allergic and inflammatory responses on a continuing basis may be harmful to health.• It is possible that chronic provocation by exposure to EMF can lead to immune dysfunction, chronic allergic responses, inflammatory responses and ill health if they occur on a continuing basis over time. This is an important area for future research.• Specific findings from studies on exposures to various types of modern equipment and/or EMFs report over-reaction of the immune system; morphological alterations of immune cells; profound increases in mast cells in the upper skin layers, increased degranulation of mast cells and larger size of mast cells in electrohypersensitive individuals; presence of biological markers for inflammation that are sensitive to EMF exposure at non-thermal levels; changes in lymphocyte viability; decreased count of NK cells; decreased count of T lymphocytes; negative effects on pregnancy (uteroplacental circulatory disturbances and placental dysfunction with possible risks to pregnancy); suppressed or impaired immune function; and inflammatory responses which can ultimately result in cellular, tissue and organ damage.• Electrical hypersensitivity is reported by individuals in the United States, Sweden, Switzerland, Germany, Denmark and many other countries of the world. Estimates range from 3% to perhaps 10% of populations, and appears to be a growing condition of ill-health leading to lost work and productivity.• The WHO and IEEE literature surveys do not include all of the relevant papers cited here, leading to the conclusion that evidence has been ignored in the current WHO ELF Health Criteria Monograph; and the proposed new IEEE C95.1 RF public exposure limits (April 2006).• The current international public safety limits for EMFs do not appear to be sufficiently protective of public health at all, based on the studies of immune function. New, biologically-based public standards are warranted that take into account low-intensity effects on immune function and health that are reported in the scientific literature.

Table 1-1 BioInitiative Report Overall Conclusions

<p>Section 9 Neurology and Behavioral Effects</p> <ul style="list-style-type: none">• Effects on neurophysiological and cognitive functions are quite well established.• Studies on EEG and brain evoked-potentials in humans exposed to cellular phone radiation predominantly showed positive effects (i.e., positive means the exposure has the ability to change brainwave activity even at exposure levels where no effect would be expected, based on traditional understanding and safety limits).• There is little doubt that electromagnetic fields emitted by cell phones and cell phone use affect electrical activity in the brain.• The behavioral consequences of these neuroelectrophysiological changes are not always predictable and research on electrophysiology also indicates that effects are dependent on the mental load of the subjects during exposure, e.g., on the complexity of the task that a subject is carrying out.• Most of the studies carried out so far are short-term exposure experiments, whereas cell phone use causes long-term repeated exposure of the brain.• In most of the behavioral experiments, effects were observed after the termination of RF exposure. In some experiments, tests were made days after exposure. This suggests a persistent change in the nervous system after exposure to RF.• In many instances, neurological and behavioral effects were observed at a SAR less than 4 W/kg. This directly contradicts the basic assumption of the IEEE guideline criterion.• Caution should be taken in concluding that a neurological effect resulted solely from the action of RF on the central nervous system because it is well known that the functions of the central nervous system can be affected by activity in the peripheral nervous system.
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Table I-1 BioInitiative Report Overall Conclusions

<p>Section 10 Brain Tumors and Acoustic Neuromas</p> <ul style="list-style-type: none"> • Studies on brain tumors and use of mobile phones for ≥ 10 years gave a consistent pattern of an increased risk for acoustic neuroma and glioma. • Cell phone use > 10 years give a consistent pattern of an increased risk for acoustic neuroma and glioma, most pronounced for high-grade glioma. The risk is highest for ipsilateral exposure. <p>Section 10 Brain Tumors and RF - Epidemiology</p> <ul style="list-style-type: none"> • Only a few studies of long-term exposure to low levels of RF fields and brain tumors exist, all of which have methodological shortcomings including lack of quantitative exposure assessment. Given the crude exposure categories and the likelihood of a bias towards the null hypothesis of no association, <i>the body of evidence is consistent with a moderately elevated risk.</i> • Occupational studies indicate that long-term exposure at workplaces may be associated with an elevated brain tumor risk. • Although the population attributable risk is low (likely below 4%), still more than 1,000 cases per year in the US can be attributed to RF exposure at workplaces alone. Due to the lack of conclusive studies of environmental RF exposure and brain tumors the potential of these exposures to increase the risk cannot be estimated. • Overall, the evidence suggests that long-term exposure to levels generally below current guideline levels still carry the risk of increasing the incidence of brain tumors. • Epidemiological studies as reviewed in the IEEE C95.1 revision (2006) are deficient to the extent that the entire analysis is professionally unsupportable. IEEE's dismissal of epidemiological studies that link RF exposure to cancer endpoints should be disregarded, as well as any IEEE conclusions drawn from this flawed analysis of epidemiological studies.
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Table I-1 BioInitiative Report Overall Conclusions

<p>Brain Tumors and Acoustic Neuromas</p> <p><u>Additional Data from Section 10</u></p> <ul style="list-style-type: none"> • Mobile phone use increases the risk of acoustic neuroma for persons using a mobile phone 10 years or longer by 30% (when used on both sides of head) to 240% (habitually used on one side of head). This information relies on a meta-analysis of several major studies. For acoustic neuroma studies by Lönn et al., (2004), Christensen et al., (2004) Schoemaker et al., (2005) and Hardell et al., (2006a) all giving results for at least 10 years latency period or more. Overall OR = 1.3, 95 % CI = 0.6-2.8 was obtained increasing to OR = 2.4, 95 % CI = 1.1-5.3 for ipsilateral mobile phone use (Lönn et al., 2004, Schoemaker et al., 2005, Hardell et al., 2006). • There is observational support for the association between acoustic neuroma and the use of mobile phones since some studies report that the tumor is often located in an anatomical area with high exposure during calls with cellular or cordless phones (Hardell et al., 2003). • Mobile phone use increases the risk of brain tumors (glioma) for persons using a mobile phone 10 years or longer by 20% (when used on both sides of head) to 200% (habitually used on one side of head). This information relies on a meta-analysis of several major studies. For glioma OR = 1.2, [95 % CI = 0.8-1.9] was calculated (Lönn et al., 2005, Christensen et al., 2005, Hepworth et al., 2006, Schüz et al., 2006, Hardell et al., 2006b, Lahkola et al., 2007). Ipsilateral use yielded OR = 2.0, [95 % CI = 1.2-3.4] (Lönn et al., 2005, Hepworth et al., 2006, Hardell et al., 2006b, Lahkola et al., 2007). • Cordless phone use is also associated with an increased risk for acoustic neuromas and brain tumors (both low- and high-grade gliomas) (Hardell et al., 2006 a,b). • The increased risk of acoustic neuroma from use of a cordless phone for ten years or more was reported to be 310% higher risk (when the cordless phone habitually used on the same-side of the head) in Hardell et al., 2006a. • The increased risk of high-grade glioma from use of a cordless phone for ten years or more was reported to be 220% higher risk (when cordless used on both sides of head) to 470% higher risk (when cordless used habitually on same side of head) in Hardell et al., 2006b. • The increased risk of low-grade glioma from use of a cordless phone for ten years or more was reported to be 60% higher risk (when cordless used on both sides of head) to 320% higher risk (when cordless used habitually on same side of head) in Hardell et al., 2006b. • The current standard for exposure to microwaves during mobile phone use and for cordless phone use is not safe considering studies reporting long-term brain tumor risk.
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Table 1-1 BioInitiative Report Overall Conclusions

<p>Section 11 Leukemia</p> <ul style="list-style-type: none">• The balance of evidence suggests that childhood leukemia is associated with exposure to power frequency EMFs either during early life or pregnancy.• Considering only average ELF (MF flux densities) the population attributable risk is low to moderate. However there is a possibility that other exposure metrics are much more strongly related to childhood leukemia and may account for a substantial proportion of cases. The population attributable fraction ranges between 1-4% (Kheifets et al., 2007); 2-4% (Greenland & Kheifets 2006); and 3.3% (Greenland, 2001) assuming only exposures above 3 to 4 mG (0.3 – 0.4 μT) are relevant. However, if it is not average ELF (average MF flux density) that is the metric causally related to childhood leukemia the attributable fraction can be much higher. Up to 80% of childhood leukemia may be caused by exposure to ELF.• Other childhood cancers except leukemia have not been studied in sufficient detail to allow conclusions about the existence and magnitude of the risk.• IEEE guideline levels are designed to protect from short-term immediate effects, long-term effects, such as cancer are evoked by levels several orders of magnitudes below current guideline levels.• Measures should be implemented to guarantee that exposure due to transmission and distribution lines is below an average of about 1 mG (0.1 μT) and precautionary measures are warranted that can reduce all aspects of exposure.
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Table 1-1 BioInitiative Report Overall Conclusions

<p>Section 12 Melatonin, Alzheimers Disease and Breast Cancer</p> <ul style="list-style-type: none">• There is strong epidemiologic evidence that long-term exposure to ELF magnetic field (MF) is a risk factor for Alzheimers disease.• There is now evidence that 1) high levels of peripheral amyloid beta are a risk factor for AD and 2) medium to high MF exposure can increase peripheral amyloid beta. High brain levels of amyloid beta are also a risk factor for AD and medium to high MF exposure to brain cells likely also increases these cells' production of amyloid beta.• There is considerable <i>in vitro</i> and animal evidence that melatonin protects against Alzheimer's disease. Therefore it is certainly possible that low levels of melatonin production are associated with an increase in the risk of AD.• There are insufficient studies to formulate an opinion as to whether radiofrequency MF exposure is a risk factor for AD.• Some studies on EMF show reduced melatonin levels. There is sufficient evidence from <i>in vitro</i> and animal studies, from human biomarker studies, from occupational and light-at-night studies, and a single longitudinal study with appropriate collection of urine samples to conclude that high MF exposure may be a risk factor for breast cancer.• There is rather strong evidence from case-control studies that longterm, high occupational exposure (≥ 10 mG or 1.0 μT) to ELF magnetic fields is a risk factor for breast cancer.• Seamstresses are, in fact, one of the most highly MF exposed occupations, with exposure levels generally above 10 mG (1.0 μT) over a significant proportion of the workday. They have also been consistently found to be at higher risk of Alzheimer's disease and (female) breast cancer. This occupation deserves attention in future studies.• There are no studies of RF magnetic fields on breast cancer that do not exclude ELF magnetic field, so that predictions of RF magnetic field alone on breast cancer cannot be assessed at this time.

Table 1-1 BioInitiative Report Overall Conclusions

<p>Section 13 Melatonin – Cell and Animal Studies</p> <ul style="list-style-type: none">• An association between power-frequency electromagnetic fields (ELF) and breast cancer is strongly supported in the scientific literature by a constellation of relevant scientific papers providing mutually-reinforcing evidence from cell and animal studies.• ELF at environmental levels negatively affects the oncostatic effects of both melatonin and tamoxifen on human breast cancer cells at common environmental levels of ELF exposure at 6 to 12 mG (0.6 to 1.2 μT). Epidemiological studies over the last two decades have reported increased risk of male and female breast cancer with exposures to residential and occupational levels of ELF. Animal studies have reported increased mammary tumor size and incidence in association with ELF exposure.• ELF limits for public exposure should be revised to reflect increased risk of breast cancer at environmental levels possibly as low as 2 mG or 3 mG (0.2 to 0.3 μT); certainly as low as 4 mG (0.4 μT).
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<p>Section 14 Effects of Modulation of Signal</p> <ul style="list-style-type: none">• There is substantial scientific evidence that some modulated fields (pulsed or repeated signals) are bioactive, which increases the likelihood that they could have health impacts with chronic exposure even at very low exposure levels.• Modulation signals may interfere with normal, non-linear biological processes.• Modulation is a fundamental factor that should be taken into account in new public safety standards; at present it is not even a contributing factor.• To properly evaluate the biological and health impacts of exposure to modulated RF (carrier waves), it is also essential to study the impact of the modulating signal (lower frequency fields or ELF-modulated RF).• Current standards have ignored modulation as a factor in human health impacts, and thus are inadequate in the protection of the public in terms of chronic exposure to some forms of ELF-modulated RF signals.• The current IEEE and ICNIRP standards are not sufficiently protective of public health with respect to chronic exposure to modulated fields (particularly new technologies that are pulse-modulated and heavily used in cellular telephony).
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Table 1-1 BioInitiative Report Overall Conclusions

<p>Section 14 Effects of Modulation of Signal (continued)</p> <ul style="list-style-type: none">• The collective papers on modulation appear to be omitted from consideration in the recent WHO and IEEE science reviews. This body of research has been ignored by current standard setting bodies that rely only on traditional energy-based (thermal) concepts.• More research is needed to determine which modulation factors, and combinations are bioactive and deleterious at low intensities, and are likely to result in disease-related processes and/or health risks; however this should not delay preventative actions supporting public health and wellness.• If signals need to be modulated in the development of new wireless technologies, for example, it makes sense to use what existing scientific information is available to avoid the most obviously deleterious exposure parameters and select others that may be less likely to interfere with normal biological processes in life.• The current membership on Risk Assessment committees needs to be made more inclusive, by adding scientists experienced with the research reporting non-thermal biological effects.• The current practice of segregating scientific investigations (and resulting public health limits) by artificial divisions of frequency needs to be changed because this approach dramatically dilutes the impact of the basic science results and eliminates consideration of modulation signals, thereby reducing and distorting the weight of evidence in any evaluation process.

<p>Section 15 Therapeutic Uses of EMF at Low-Intensity Levels</p> <ul style="list-style-type: none">• EMFs are both a cause of disease, and also used for treatment of disease (at levels far below existing public exposure standards).• Electromagnetic fields are widely used in therapeutic medical applications.• Proof of effectiveness has been demonstrated in numerous clinical applications of low-intensity ELF and RF.• EMFs have been shown to be effective in treating conditions of disease at energy levels far below current public exposure standards.• Indiscriminate EMF exposure is ill advised at even at common environmental levels.• Multiple sources of EMF exposure in daily life, and cumulative exposures to potentially harmful combinations of EMF are ignored – we don't even study it properly yet.
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Table 1-1 BioInitiative Report Overall Conclusions

<p>Section 16 The Precautionary Principle</p> <ul style="list-style-type: none">• The Precautionary Principle has been developed to help justify public policy action on the protection of health where there are plausible, serious and irreversible hazards from current and future exposures and where there are many uncertainties and much scientific ignorance. EMF is characterized by such circumstances.• The lessons from the histories of most well known hazards show that precautionary- based yet proportionate measures taken in response to robust early warnings can avoid the kinds of costs incurred by asbestos, smoking, PCBs, X rays etc. Such lessons are relevant to the EMP issue.• Policymakers need to be aware of the systematic biases within the environmental health science against finding a true hazard, in order to not compromise scientific integrity. However, this bias can lead to the health of people or environments being compromised.• The Precautionary Principle introduces the use of different levels of proof (or strengths of evidence) to justify actions to reduce exposure, where the level of proof chosen depends upon the nature and distribution of the costs of being wrong in acting, or not acting; the benefits of the agent or substance in question; the availability of alternatives, etc. Waiting for high levels of scientific proof of causality, or for knowledge about mechanisms of action, can be very expensive in terms of compensation, health care, job losses, reductions in public trust of scientists etc.• The level of proof chosen to justify action does not determine any particular policy measure, or type of action. This is dependent on factors such as the costs of different measures, equity, the origins of the risk, ie voluntary or imposed, etc.• There is a need to involve stakeholders in helping to frame problems for risk assessments and to choose appropriate levels of proof and types of actions to reduce exposure.

Table 1-1 BioInitiative Report Overall Conclusions

<p>Section 17: Key Scientific Evidence and Public Health Policy Recommendations</p> <ul style="list-style-type: none">• We cannot afford 'business as usual' any longer. It is time that planning for new power lines and for new homes, schools and other habitable spaces around them is done with provision for low-ELF environments. The business-as-usual deployment of new wireless technologies is likely to be risky and harder to change if society does not make some educated decisions about limits soon. Research must continue to define what levels of RF related to new wireless technologies are acceptable; but more research should not prevent or delay substantive changes today that might save money, lives and societal disruption tomorrow.• New regulatory limits for ELF are warranted. ELF limits should be set below those exposure levels that have been linked in childhood leukemia studies to increased risk of disease, plus an additional safety factor. It is no longer acceptable to build new power lines and electrical facilities that place people in ELF environments that have been determined to be risky (at levels generally at 2 mG (0.2 μT) and above).• While new ELF limits are being developed and implemented, a reasonable approach would be a 1 mG (0.1 μT) planning limit for habitable space adjacent to all new or upgraded power lines and a 2 mG (0.2 μT) limit for all other new construction. It is also recommended that a 1 mG (0.1 μT) limit be established for existing habitable space for children and/or women who are pregnant. This recommendation is based on the assumption that a higher burden of protection is required for children who cannot protect themselves, and who are at risk for childhood leukemia at rates that are traditionally high enough to trigger regulatory action. This situation in particular warrants extending the 1 mG (0.1 μT) limit to existing occupied space. "Establish" in this case probably means formal public advisories from relevant health agencies.• While it is not realistic to reconstruct all existing electrical distributions systems, in the short term; steps to reduce exposure from these existing systems need to be initiated, especially in places where children spend time, and should be encouraged.• A precautionary limit of 0.1 μW/cm² (which is also 0.614 Volts per meter) should be adopted for outdoor, cumulative RF exposure. This reflects the current RF science and prudent public health response that would reasonably be set for pulsed RF (ambient) exposures where people live, work and go to school. This level of RF is experienced as whole-body exposure, and can be a chronic exposure where there is wireless coverage present for voice and data transmission for cell phones, pagers and PDAs and other sources of radiofrequency radiation. Some studies and many anecdotal reports on ill health have been reported at lower levels than this; however, for the present time, it could prevent some of the most disproportionate burdens placed on the public nearest to such installations. Although this RF target level does not preclude further rollout of WI-FI technologies, we also recommend that wired alternatives to WI-FI be implemented, particularly in schools and libraries so that children are not subjected to elevated RF levels until more is understood about possible health impacts. This recommendation should be seen as an interim precautionary limit that is intended to guide preventative actions; and more conservative limits may be needed in the future.
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Table 1-1 BioInitiative Report Overall Conclusions

<p>Section 17: Key Scientific Evidence and Public Health Policy Recommendations (continued)</p> <ul style="list-style-type: none">• New public safety limits should be developed and implemented for ELF (50 Hz and 60 Hz electrical power frequencies). ELF limits should be set below those exposure levels that have been linked in childhood leukemia studies to increased risk of disease, plus an additional safety factor.• Guidance should be provided to electric utilities on the need to reduce ELF exposures in siting and construction of new power lines and substations. Mitigation of existing sources of ELF over 1 mG (0.1 μT) should be encouraged, particularly where children and women who are pregnant, or who may be come pregnant spend significant portions of their time.• Requests for measurement and monitoring of ELF and RF should be provided by utilities (for power line and household ELF) and by employers (for workplace ELF and RF) and those who request information should receive full results of such surveys on request.• International health organizations and agencies should issue public health advisories for those exposed to levels of ELF and RF implicated with increased risks from cancer/neurodegenerative diseases and memory/learning/immune/stress responses. These advisories should address both residential and occupational exposures.• Reliable, unbiased information should be developed and distributed through a clearinghouse that is available to the public. Scientific, public health and policy option information should be provided for independent review at an affordable cost to the public. Research articles and prudent avoidance strategies should be made available in many languages.• Cell phones and other wireless devices should be redesigned to operate only on speaker-phone mode or text message mode.• Restrictions should be placed on the sale and advertising of cell phones and other wireless devices to children age 0 to 18 years.• All countries should continue to provide wired phone service; and should be strongly discouraged from phasing it out, including pay telephones in public places.• Manufacturers of devices that operate with wireless features should be required to carry SAR level information and warning labels on the outside packaging (not hidden inside). Wireless devices that create elevated RF levels for the user should be required to warn the user of possible adverse effects on memory and learning, cognitive function, sleep disruption and insomnia, mood disorders, balance, headache, fatigue, ringing in the ears (tinnitus), immune function, and other adverse symptoms of use.• Warning labels on cell phones and PDAs (personal digital assistant devices) and other wireless devices are needed to alert users to excessively high ELF emissions from the switching battery pack, and require labels to list mitigation measures to reduce exposure (do not wear on or near body in "ON-Receive" position; use only with earpiece or on speaker mode, etc).• Disclosure should be provided to the public on the location and operating characteristics of all wireless antenna sites in a fashion easily accessible to the public so informed choices can be made about where to live, shop, work and go to school. Such information should mandatorily include cumulative RF/MW exposures based on calculations from FCC OET Bulletin 65 (or equivalent) at ground level and second story level in increments of 50 feet outward from the facility to a power density of 0.1 μW/cm² or 0.614 V/m. Signage for the public should be a mandatory condition of approval for all sites, and should be kept current. Public agencies that approve and monitor wireless sites should require the applicant to identify locations of wireless facilities.
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Table 1-1 BioInitiative Report Overall Conclusions

<p>Section 17: Key Scientific Evidence and Public Health Policy Recommendations (continued)</p> <ul style="list-style-type: none">• Mobile phone - free and WI-FI-free public areas should be established in areas where the public congregates and can have a reasonable expectation of safety; including airports, public shopping, hospitals, libraries, medical clinics, convalescent homes and assisted living facilities, theatres, restaurants, parks, etc.• Health agencies and school districts should strongly discourage or prohibit cell towers on or near (within 1000' of) school properties, should delay any new WLAN installations in school classrooms, pre-schools and day-care facilities; and should either remove or disable existing wireless facilities, or be required to offer classrooms with no RF exposure to those families who choose not to have their children involuntarily exposed.
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BIOINITIATIVE 2012 - CONCLUSIONS Table 1-1

(Genetics and Neurological Effects Updated March 2014)

Overall, more than 1800 or so new studies report abnormal gene transcription (Section 5); genotoxicity and single-and double-strand DNA damage (Section 6); stress proteins because of the fractal RF-antenna like nature of DNA (Section 7); chromatin condensation and loss of DNA repair capacity in human stem cells (Sections 6 and 15); reduction in free-radical scavengers - particularly melatonin (Sections 5, 9, 13, 14, 15, 16 and 17); neurotoxicity in humans and animals (Section 9), carcinogenicity in humans (Sections 11, 12, 13, 14, 15, 16 and 17); serious impacts on human and animal sperm morphology and function (Section 18); effects on offspring behavior (Section 18, 19 and 20); and effects on brain and cranial bone development in the offspring of animals that are exposed to cell phone radiation during pregnancy (Sections 5 and 18). This is only a snapshot of the evidence presented in the BioInitiative 2012 updated report.

BIOEFFECTS ARE CLEARLY ESTABLISHED

Bioeffects are clearly established and occur at very low levels of exposure to electromagnetic fields and radiofrequency radiation. Bioeffects can occur in the first few minutes at levels associated with cell and cordless phone use. Bioeffects can also occur from just minutes of exposure to mobile phone masts (cell towers), WI-FI, and wireless utility 'smart' meters that produce whole-body exposure. Chronic base station level exposures can result in illness.

BIOEFFECTS WITH CHRONIC EXPOSURES CAN REASONABLY BE PRESUMED TO RESULT IN ADVERSE HEALTH EFFECTS

Many of these bioeffects can reasonably be presumed to result in adverse health effects if the exposures are prolonged or chronic. This is because they interfere with normal body processes (disrupt homeostasis), prevent the body from healing damaged DNA, produce immune system imbalances, metabolic disruption and lower resilience to disease across multiple pathways. Essential body processes can eventually be disabled by incessant external stresses (from system-wide electrophysiological interference) and lead to pervasive impairment of metabolic and reproductive functions.

LOW EXPOSURE LEVELS ARE ASSOCIATED WITH BIOEFFECTS AND ADVERSE HEALTH EFFECTS AT CELL TOWER RFR EXPOSURE LEVELS

At least five new cell tower studies are reporting bioeffects in the range of 0.003 to 0.05 $\mu\text{W}/\text{cm}^2$ at lower levels than reported in 2007 (0.05 to 0.1 $\mu\text{W}/\text{cm}^2$ was the range below which, in 2007, effects were not observed). Researchers report headaches, concentration difficulties and behavioral problems in children and adolescents; and sleep disturbances, headaches and concentration problems in adults. Public safety standards are 1,000 – 10,000 or more times higher than levels now commonly reported in mobile phone base station studies to cause bioeffects.

EVIDENCE FOR FERTILITY AND REPRODUCTION EFFECTS: HUMAN SPERM AND THEIR DNA ARE DAMAGED

Human sperm are damaged by cell phone radiation at very low intensities in the low microwatt and nanowatt/cm² range (0.00034 – 0.07 uW/cm²). There is a veritable flood of new studies reporting sperm damage in humans and animals, leading to substantial concerns for fertility, reproduction and health of the offspring (unrepaired de novo mutations in sperm). Exposure levels are similar to those resulting from wearing a cell phone on the belt, or in the pants pocket, or using a wireless laptop computer on the lap. Sperm lack the ability to repair DNA damage.

Studies of human sperm show genetic (DNA) damage from cell phones on standby mode and wireless laptop use. Impaired sperm quality, motility and viability occur at exposures of 0.00034 uW/cm² to 0.07 uW/cm² with a resultant reduction in human male fertility. Sperm cannot repair DNA damage.

Several international laboratories have replicated studies showing adverse effects on sperm quality, motility and pathology in men who use and particularly those who wear a cell phone, PDA or pager on their belt or in a pocket (Agarwal et al, 2008; Agarwal et al, 2009; Wdowiak et al, 2007; De Iulius et al, 2009; Fejes et al, 2005; Aitken et al, 2005; Kumar, 2012). Other studies conclude that usage of cell phones, exposure to cell phone radiation, or storage of a mobile phone close to the testes of human males affect sperm counts, motility, viability and structure (Aitken et al, 2004; Agarwal et al, 2007; Eroglu et al., 2006). Animal studies have demonstrated oxidative and DNA damage, pathological changes in the testes of animals, decreased sperm mobility and viability, and other measures of deleterious damage to the male germ line (Dasdag et al, 1999; Yan et al, 2007; Otitoloju et al, 2010; Salama et al, 2008; Behari et al, 2006; Kumar et al, 2012). There are fewer animal studies that have studied effects of cell phone radiation on female fertility parameters. Panagopoulous et al. 2012 report decreased ovarian development and size of ovaries, and premature cell death of ovarian follicles and nurse cells in *Drosophila melanogaster*. Gul et al (2009) report rats exposed to stand-by level RFR (phones on but not transmitting calls) caused decrease in the number of ovarian follicles in pups born to these exposed dams. Magras and Xenos (1997) reported irreversible infertility in mice after five (5) generations of exposure to RFR at cell phone tower exposure levels of less than one microwatt per centimeter squared ($\mu\text{W}/\text{cm}^2$).

EVIDENCE THAT CHILDREN ARE MORE VULNERABLE

There is good evidence to suggest that many toxic exposures to the fetus and very young child have especially detrimental consequences depending on when they occur during critical phases of growth and development (time windows of critical development), where such exposures may lay the seeds of health harm that develops even decades later. Existing FCC and ICNIRP public safety limits seem to be not sufficiently protective of public health, in particular for the young (embryo, fetus, neonate, very young child).

The Presidential Cancer Panel (2010) found that children 'are at special risk due to their smaller body mass and rapid physical development, both of which magnify their vulnerability to known carcinogens, including radiation.'

The American Academy of Pediatrics, in a letter to Congressman Dennis Kucinich dated 12 December 2012 states “*Children are disproportionately affected by environmental exposures, including cell phone radiation. The differences in bone density and the amount of fluid in a child’s brain compared to an adult’s brain could allow children to absorb greater quantities of RF energy deeper into their brains than adults. It is essential that any new standards for cell phones or other wireless devices be based on protecting the youngest and most vulnerable populations to ensure they are safeguarded through their lifetimes.*”

FETAL AND NEONATAL EFFECTS OF EMF

Fetal (*in-utero*) and early childhood exposures to cell phone radiation and wireless technologies in general may be a risk factor for hyperactivity, learning disorders and behavioral problems in school.

Fetal Development Studies: Effects on the developing fetus from *in-utero* exposure to cell phone radiation have been observed in both human and animal studies since 2006. Divan et al (2008) found that children born of mothers who used cell phones during pregnancy develop more behavioral problems by the time they have reached school age than children whose mothers did not use cell phones during pregnancy. Children whose mothers used cell phones during pregnancy had 25% more emotional problems, 35% more hyperactivity, 49% more conduct problems and 34% more peer problems (Divan et al., 2008).

Common sense measures to limit both ELF-EMF and RF EMF in these populations is needed, especially with respect to avoidable exposures like incubators that can be modified; and where education of the pregnant mother with respect to laptop computers, mobile phones and other sources of ELF-EMF and RF EMF are easily instituted.

Sources of fetal and neonatal exposures of concern include cell phone radiation (both paternal use of wireless devices worn on the body and maternal use of wireless phones during pregnancy). Exposure to whole-body RFR from base stations and WI-FI, use of wireless laptops, use of incubators for newborns with excessively high ELF-EMF levels resulting in altered heart rate variability and reduced melatonin levels in newborns, fetal exposures to MRI of the pregnant mother, and greater susceptibility to leukemia and asthma in the child where there have been maternal exposures to ELF-EMF.

A precautionary approach may provide the frame for decision-making where remediation actions have to be realized to prevent high exposures of children and pregnant woman.

(Bellieni and Pinto, 2012 – Section 19)

EMF/RFR AS A PLAUSIBLE BIOLOGICAL MECHANISM FOR AUTISM (ASD)

- Children with existing neurological problems that include cognitive, learning, attention, memory, or behavioral problems should as much as possible be provided with wired (not wireless) learning, living and sleeping environments,
 - Special education classrooms should observe 'no wireless' conditions to reduce avoidable stressors that may impede social, academic and behavioral progress.
 - All children should reasonably be protected from the physiological stressor of significantly elevated EMF/RFR (wireless in classrooms, or home environments).
 - School districts that are now considering all-wireless learning environments should be strongly cautioned that wired environments are likely to provide better learning and teaching environments, and prevent possible adverse health consequences for both students and faculty in the long-term.
 - Monitoring of the impacts of wireless technology in learning and care environments should be performed with sophisticated measurement and data analysis techniques that are cognizant of the non-linear impacts of EMF/RFR and of data techniques most appropriate for discerning these impacts.
 - There is sufficient scientific evidence to warrant the selection of wired internet, wired classrooms and wired learning devices, rather than making an expensive and potentially health-harming commitment to wireless devices that may have to be substituted out later, and
 - Wired classrooms should reasonably be provided to all students who opt-out of wireless environments!
- (Herbert and Sage, 2012 – Section 20)

Many disrupted physiological processes and impaired behaviors in people with ASDs closely resemble those related to biological and health effects of EMF/RFR exposure. Biomarkers and indicators of disease and their clinical symptoms have striking similarities. Broadly speaking, these types of phenomena can fall into one or more of several classes: a) alteration of genes or gene expression, b) induction of change in brain or organismic development, c) alteration of phenomena modulating systemic and brain function on an ongoing basis throughout the life course (which can include systemic pathophysiology as well as brain-based changes), and d) evidence of functional alteration in domains such as behavior, social interaction and attention known to be challenged in ASD.

Several thousand scientific studies over four decades point to serious biological effects and health harm from EMF and RFR. These studies report genotoxicity, single- and double-strand DNA damage, chromatin condensation, loss of DNA repair capacity in human stem cells, reduction in free-radical scavengers (particularly melatonin), abnormal gene transcription, neurotoxicity, carcinogenicity, damage to sperm morphology and function, effects on behavior, and effects on brain development in the fetus of human mothers that use cell phones during pregnancy. Cell phone exposure has been linked to altered fetal brain development and ADHD-like behavior in the offspring of pregnant mice.

Reducing life-long health risks begins in the earliest stages of embryonic and fetal development, is accelerated for the infant and very young child compared to adults, and is not complete in young people (as far as brain and nervous system maturation) until the early 20's. Windows of critical development mean that risk factors once laid down in the cells, or in epigenetic changes in the genome may have grave and life-long consequences for health or illness for every individual.

All relevant environmental conditions, including EMF and RFR, which can degrade the human genome, and impair normal health and development of species including homo sapiens, should be given weight in defining and implementing prudent, precautionary actions to protect public health.

Allostatic load in autism and autistic decompensation - we may be at a tipping point that can be pushed back by removing unnecessary stressors like EMF/RFR and building resilience.

The consequence of ignoring clear evidence of large-scale health risks to global populations, when the risk factors are largely avoidable or preventable is too high a risk to take. With the epidemic of autism (ASD) putting the welfare of children, and their families in peril at a rate of one family in 88, the rate still increasing annually, we cannot afford to ignore this body of evidence. The public needs to know that these risks exist, that transition to wireless should not be presumed safe, and that it is very much worth the effort to minimize exposures that still provide the benefits of technology in learning, but without the threat of health risk and development impairments to learning and behavior in the classroom.

(Herbert and Sage, 2012 – Section 20)

THE BLOOD-BRAIN BARRIER IS AT RISK

The BBB is a protective barrier that prevents the flow of toxins into sensitive brain tissue. Increased permeability of the BBB caused by cell phone RFR may result in neuronal damage. Many research studies show that very low intensity exposures to RFR can affect the blood-brain barrier (BBB) (mostly animal studies). Summing up the research, it is more probable than unlikely that non-thermal EMF from cell phones and base stations do have effects upon biology. A single 2-hr exposure to cell phone radiation can result in increased leakage of the BBB, and 50 days after exposure, neuronal damage can be seen, and at the later time point also albumin leakage is demonstrated. The levels of RFR needed to affect the BBB have been shown to be as low as 0.001 W/kg, or less than holding a mobile phone at arm's length. The US FCC standard is 1.6 W/kg; the ICNIRP standard is 2 W/kg of energy (SAR) into brain tissue from cell/cordless phone use. Thus, BBB effects occur at about 1000 times lower RFR exposure levels than the US and ICNIRP limits allow.

(Salford et al, 2012 - Section 10)

If the blood-brain barrier is vulnerable to serious and on-going damage from wireless exposures, then we should perhaps also be looking at the blood-ocular barrier (that protects the eyes), the blood-placenta barrier (that protects the developing fetus) and the blood-gut barrier (that protects proper digestion and nutrition), and the blood-testes barrier (that protects developing sperm) to see if they too can be damaged by RFR.

EPIDEMIOLOGICAL STUDIES CONSISTENTLY SHOW ELEVATIONS IN RISK OF BRAIN CANCERS

Brain Tumors: There is a consistent pattern of increased risk of glioma and acoustic neuroma associated with use of mobile phones and cordless phones.

“Based on epidemiological studies there is a consistent pattern of increased risk for glioma and acoustic neuroma associated with use of mobile phones and cordless phones. The evidence comes mainly from two study centres, the Hardell group in Sweden and the Interphone Study Group. No consistent pattern of an increased risk is seen for meningioma. A systematic bias in the studies that explains the results would also have been the case for meningioma. The different risk pattern for tumor type strengthens the findings regarding glioma and acoustic neuroma. Meta-analyses of the Hardell group and Interphone studies show an increased risk for glioma and acoustic neuroma. Supportive evidence comes also from anatomical localisation of the tumor to the most exposed area of the brain, cumulative exposure in hours and latency time that all add to the biological relevance of an increased risk. In addition risk calculations based on estimated absorbed dose give strength to the findings.

“There is reasonable basis to conclude that RF-EMFs are bioactive and have a potential to cause health impacts. There is a consistent pattern of increased risk for glioma and acoustic neuroma associated with use of wireless phones (mobile phones and cordless phones) mainly based on results from case-control studies from the Hardell group and Interphone Final Study results. Epidemiological evidence gives that RF-EMF should be classified as a human carcinogen.

Based on our own research and review of other evidence the existing FCC/IEEE and ICNIRP public safety limits and reference levels are not adequate to protect public health. New public health standards and limits are needed.
(Hardell et al, 2012 – Section 11)

EVIDENCE FOR GENETIC EFFECTS (Updated March 2014)

One hundred fourteen (114) new papers on genotoxic effects of RFR published between 2007 and early 2014 are profiled. Of these, 74 (65%) showed effects and 40 (35%) showed no effects.

Fifty nine (59) new ELF-EMF papers and two static magnetic field papers that report on genotoxic effects of ELF-EMF between 2007 and early 2014 are profiled. Of these, 49 (83%) show effects and 10 (17%) show no effect.
(Lai, 2014 – Section 6)

EVIDENCE FOR NEUROLOGICAL EFFECTS (Updated March 2014)

Two hundred eleven (211) new papers that report on neurological effects of RFR published between 2007 and early 2014 are profiled. Of these, 144 (68%) showed effects and 67 (32%) showed no effects.

One hundred five (105) new ELF-EMF papers (including two static field papers) that report on neurological-effects of ELF-EMF published between 2007 and early 2014 are profiled. Of these, 95 (90%) show effects and 10 (10%) show no effect. (Lai, 2014 – Section 9)

EVIDENCE FOR CHILDHOOD CANCERS (LEUKEMIA)

With overall 42 epidemiological studies published to date power frequency EMFs are among the most comprehensively studied environmental factors. Except ionizing radiation no other environmental factor has been as firmly established to increase the risk of childhood leukemia. Sufficient evidence from epidemiological studies of an increased risk from exposure to EMF (power frequency magnetic fields) that cannot be attributed to chance, bias or confounding. Therefore, according to the rules of IARC such exposures can be classified as a **Group 1 carcinogen (Known Carcinogen)**.

There is no other risk factor identified so far for which such unlikely conditions have been put forward to postpone or deny the necessity to take steps towards exposure reduction. As one step in the direction of precaution, measures should be implemented to guarantee that exposure due to transmission and distribution lines is below an average of about 1 mG. This value is arbitrary at present and only supported by the fact that in many studies this level has been chosen as a reference.

Base-station level RFR at levels ranging from less than 0.001 uW/cm² to 0.05 uW/cm². In 5 new studies since 2007, researchers report headaches, concentration difficulties and behavioral problems in children and adolescents; and sleep disturbances, headaches and concentration problems in adults.

MELATONIN, BREAST CANCER AND ALZHEIMER'S DISEASE

MELATONIN AND BREAST CANCER

Conclusion: Eleven (11) of the 13 published epidemiologic residential and occupational studies are considered to provide (positive) evidence that high ELF MF exposure can result in decreased melatonin production. The two negative studies had important deficiencies that may certainly have biased the results. There is sufficient evidence to conclude that long-term relatively high ELF MF exposure can result in a decrease in melatonin production. It has not been determined to what extent personal characteristics, e.g., medications, interact with ELF MF exposure in decreasing melatonin production

Conclusion: New research indicates that ELF MF exposure, in vitro, can significantly decrease melatonin activity through effects on MT1, an important melatonin receptor.
(Davanipour and Sobel, 2012 – Section 13)

ALZHEIMER'S DISEASE

There is strong epidemiologic evidence that exposure to ELF MF is a risk factor for AD. There are now twelve (12) studies of ELF MF exposure and AD or dementia which . Nine (9) of these studies are considered positive and three (3) are considered negative. The three negative studies have serious deficiencies in ELF MF exposure classification that results in subjects with rather low exposure being considered as having significant exposure. There are insufficient studies to formulate an opinion as to whether radiofrequency MF exposure is a risk or protective factor for AD.

There is now evidence that (i) high levels of peripheral amyloid beta are a risk factor for AD and (ii) medium to high ELF MF exposure can increase peripheral amyloid beta. High brain levels of amyloid beta are also a risk factor for AD and medium to high ELF MF exposure to brain cells likely also increases these cells' production of amyloid beta.

There is considerable in vitro and animal evidence that melatonin protects against AD. Therefore it is certainly possible that low levels of melatonin production are associated with an increase in the risk of AD.

(Davanipour and Sobel, 2012 – Section 13)

STRESS PROTEINS AND DNA AS A FRACTAL ANTENNA FOR RFR

DNA acts as a 'fractal antenna' for EMF and RFR.

The coiled-coil structure of DNA in the nucleus makes the molecule react like a fractal antenna to a wide range of frequencies.

The structure makes DNA particularly vulnerable to EMF damage.

The mechanism involves direct interaction of EMF with the DNA molecule (claims that there are no known mechanisms of interaction are patently false)

Many EMF frequencies in the environment can and do cause DNA changes.

The EMF-activated cellular stress response is an effective protective mechanism for cells exposed to a wide range of EMF frequencies.

EMF stimulates stress proteins (indicating an assault on the cell).

EMF efficiently harms cells at a billion times lower levels than conventional heating.
Blank, 2012 – Section 7)

Safety standards based on heating are irrelevant to protect against EMF-levels of exposure. There is an urgent need to revise EMF exposure standards. Research has shown thresholds are very low (safety standards must be reduced to limit biological responses). Biologically-based EMF safety standards could be developed from the research on the stress response. (Blank, 2012 – Section 7)

EVIDENCE FOR DISRUPTION OF THE MODULATING SIGNAL HUMAN STEM CELL DNA DOES NOT ADAPT OR REPAIR

Human stem cells do not adapt to chronic exposures to non-thermal microwave (cannot repair damaged DNA), and damage to DNA in genes in other cells generally do not repair as efficiently. (Belyaev, 2012 – Section 15)

Non-thermal effects of microwaves depend on variety of biological and physical parameters that should be taken into account in setting the safety standards. Emerging evidence suggests that the SAR concept, which has been widely adopted for safety standards, is not useful alone for the evaluation of health risks from non-thermal microwave of mobile communication. Other parameters of exposure, such as frequency, modulation, duration, and dose should be taken into account.

Lower intensities are not always less harmful; they may be more harmful.

Intensity windows exist, where bioeffects are much more powerful.

A linear, dose-response relationship test is probably invalid for testing of RFR and EMF (as is done in chemicals testing for toxicity).

Resonant frequencies may result in biological effects at very low intensities comparable to base station (cell tower) and other microwave sources used in mobile communications. These exposures can cause health risk. The current safety standards are insufficient to protect from non-thermal microwave effects.

The data about the effects of microwave at super-low intensities and significant role of duration of exposure in these effects along with the data showing that adverse effects of non-thermal microwave from GSM/UMTS mobile phones depend on carrier frequency and type of the microwave signal suggest that microwave from base-stations/masts, wireless routers, WI-FI and other wireless devices and exposures in common use today can also produce adverse effects at prolonged durations of exposure.

Most of the real signals that are in use in mobile communication have not been tested so far. Very little research has been done with real signals and for durations and intermittences of exposure that are relevant to chronic exposures from mobile communication. In some studies, so-called "mobile communication-like" signals were investigated that in fact were different from the real exposures in such important aspects as intensity, carrier frequency, modulation, polarization, duration and intermittence.

New standards should be developed based on knowledge of mechanisms of non-thermal effects. Importantly, because the signals of mobile communication are completely replaced by other signals faster than once per 10 years, duration comparable with latent period, epidemiologic studies cannot provide basement for cancer risk assessment from upcoming new signals.

In many cases, because of ELF modulation and additional ELF fields created by the microwave sources, for example by mobile phones, it is difficult to distinguish the effects of exposures to ELF and microwave. Therefore, these combined exposures and their possible cancer risks should be considered in combination.

As far as different types of microwave signals (carrier frequency, modulation, polarization, far and near field, intermittence, coherence, *etc.*) may produce different effects, cancer risks should ideally be estimated for each microwave signal separately.

The Precautionary Principle should be implemented while new standards are in progress.

It should be anticipated that some part of the human population, such as children, pregnant women and groups of hypersensitive persons could be especially sensitive to the non-thermal microwave exposures.

(Belyaev, 2012 – Section 15)

N. EFFECTS OF WEAK-FIELD INTERACTIONS ON NON-LINEAR BIOLOGICAL OSCILLATORS AND SYNCHRONIZED NEURAL ACTIVITY

A unifying hypothesis for a plausible biological mechanism to account for very weak field EMF bioeffects other than cancer may lie with weak field interactions of pulsed RFR and ELF-modulated RFR as disrupters of synchronized neural activity. Electrical rhythms in our brains can be influenced by external signals. This is consistent with established weak field effects on coupled biological oscillators in living tissues. Biological systems of the heart, brain and gut are dependent on the cooperative actions of cells that function according to principles of non-linear, coupled biological oscillations for their synchrony, and are dependent on exquisitely timed cues from the environment at vanishingly small levels (Buzsaki, 2006; Strogatz, 2003). The key to synchronization is the joint actions of cells that co-operate electrically - linking populations of biological oscillators that couple together in large arrays and synchronize spontaneously. Synchronous biological oscillations in cells (pacemaker cells) can be disrupted by artificial, exogenous environmental signals, resulting in desynchronization of neural activity that regulates critical functions (including metabolism) in the brain, gut and heart and circadian rhythms governing sleep and hormone cycles (Strogatz, 1987). The brain contains a population of oscillators with distributed natural frequencies, which pull one another into synchrony (the circadian pacemaker cells). Strogatz has addressed the unifying mathematics of biological cycles and external factors disrupt these cycles (Strogatz, 2001, 2003). *“Rhythms can be altered by a wide variety of agents and that these perturbations must seriously alter brain performance”* (Buzsaki; 2006).

“Organisms are biochemically dynamic. They are continuously subjected to time-varying conditions in the form of both extrinsic driving from the environment and intrinsic rhythms generated by specialized cellular clocks within the organism itself. Relevant examples of the latter are the cardiac pacemaker located at the sinoatrial node in mammalian hearts (1) and the circadian clock residing at the suprachiasmatic nuclei in mammalian brains (2). These rhythm generators are composed of thousands of clock cells that are intrinsically diverse but nevertheless manage to function in a coherent oscillatory state. This is the case, for instance, of the circadian oscillations exhibited by the suprachiasmatic nuclei, the period of which is known to be determined by the mean period of the individual neurons making up the circadian clock (3-7). The mechanisms by which this collective behavior arises remain to be understood.” (Strogatz, 2001; Strogatz, 2003)

Synchronous biological oscillations in cells (pacemaker cells) can be disrupted by artificial, exogenous environmental signals, resulting in desynchronization of neural activity that regulates critical functions (including metabolism) in the brain, gut and heart and circadian rhythms governing sleep and hormone cycles. The brain contains a population of oscillators with distributed natural frequencies, which pull one another into synchrony (the circadian pacemaker cells). Strogatz has addressed the unifying mathematics of biological cycles and external factors disrupt these cycles.

EMF AND RFR MAKE CHEMICAL TOXINS MORE HARMFUL

EMF acts on the body like other environmental toxicants do (heavy metals, organic chemicals and pesticides). Both toxic chemicals and EMF may generate free radicals, produce stress proteins and cause indirect damage to DNA. Where there is combined exposure the damages may add or even synergistically interact, and result in worse damage to genes.
(Sage and Carpenter, 2012 – Section 24)

EMF IS SUCCESSFULLY USED IN HEALING AND DISEASE TREATMENTS

“The potential application of the up-regulation of the HSP70 gene by both ELF-EMF and nanosecond PEMF in clinical practice would include trauma, surgery, peripheral nerve damage, orthopedic fracture, and vascular graft support, among others. Regardless of pulse design, EMF technology has been shown to be effective in bone healing [5]; wound repair [11] and neural regeneration [31,36,48,49,51,63,64,65,66]. In terms of clinical application, EMF-induction of elevated levels of hsp70 protein also confers protection against hypoxia [61] and aid myocardial function and survival [20,22]. Given these results, we are particularly interested in the translational significance of effect vs. efficacy which is not usually reported by designers or investigators of EMF devices. More precise description of EM pulse and sine wave parameters, including the specific EM output sector, will provide consistency and “scientific basis” in reporting findings.”

“The degree of electromagnetic field-effects on biological systems is known to be dependent on a number of criteria in the waveform pattern of the exposure system used; these include frequency, duration, wave shape, and relative orientation of the fields [6,29,32,33,39,40]. In some cases pulsed fields have demonstrated increased efficacy over static designs [19,21] in both medical and experimental settings.” (Madkan et al, 2009)

(Sage and Carpenter, 2012 – Section 24)

ELF-EMF AND RFR ARE CLASSIFIED AS POSSIBLE CANCER-CAUSING AGENTS – WHY ARE GOVERNMENTS NOT ACTING?

The World Health Organization International Agency for Research on Cancer has classified wireless radiofrequency as a Possible Human Carcinogen (May, 2011)*. The designation applies to low-intensity RFR in general, covering all RFR-emitting devices and exposure sources (cell and cordless phones, WI-FI, wireless laptops, wireless hotspots, electronic baby monitors, wireless classroom access points, wireless antenna facilities, etc). The IARC Panel could have chosen to classify RFR as a Group 4 – Not A Carcinogen if the evidence was clear that RFR is not a cancer-causing agent. It could also have found a Group 3 designation was a good interim choice (Insufficient Evidence). IARC did neither.

(Sage and Carpenter, 2012 – Section 24)

NEW SAFETY LIMITS MUST BE ESTABLISHED - HEALTH AGENCIES SHOULD ACT NOW

Existing public safety limits (FCC and ICNIRP public safety limits) do not sufficiently protect public health against chronic exposure from very low-intensity exposures. If no mid-course corrections are made to existing and outdated safety limits, such delay will magnify the public health impacts with even more applications of wireless-enabled technologies exposing even greater populations around the world in daily life. (Sage and Carpenter, 2012 – Section 24)

SCIENTIFIC BENCHMARKS FOR HARM PLUS SAFETY MARGIN = NEW SAFETY LIMITS THAT ARE VALID

Health agencies and regulatory agencies that set public safety standards for ELF-EMF and RFR should act now to adopt new, biologically-relevant safety limits that key to the lowest scientific benchmarks for harm coming from the recent studies, plus a lower safety margin. Existing public safety limits are too high by several orders of magnitude, if prevention of bioeffects and minimization or elimination of resulting adverse human health effects. Most safety standards are a thousand times or more too high to protect healthy populations, and even less effective in protecting sensitive subpopulations.

(Sage and Carpenter, 2012 – Section 24)

SENSITIVE POPULATIONS MUST BE PROTECTED

Safety standards for sensitive populations will more likely need to be set at lower levels than for healthy adult populations. Sensitive populations include the developing fetus, the infant, children, the elderly, those with pre-existing chronic diseases, and those with developed electrical sensitivity (EHS). (Sage and Carpenter, 2012 – Section 24)

PROTECTING NEW LIFE - INFANTS AND CHILDREN

Strong precautionary action and clear public health warnings are warranted immediately to help prevent a global epidemic of brain tumors resulting from the use of wireless devices (mobile phones and cordless phones). Common sense measures to limit both ELF-EMF and RFR in the fetus and newborn infant (sensitive populations) are needed, especially with respect to avoidable exposures like baby monitors in the crib and baby isolettes (incubators) in hospitals that can be modified; and where education of the pregnant mother with respect to laptop computers, mobile phones and other sources of ELF-EMF and RFR are easily instituted.

(Sage and Carpenter, 2012 – Section 24)

Wireless laptops and other wireless devices should be strongly discouraged in schools for children of all ages. (Sage and Carpenter, 2012 – Section 24)

STANDARD OF EVIDENCE FOR JUDGING THE SCIENCE

The standard of evidence for judging the scientific evidence should be based on good public health principles rather than demanding scientific certainty before actions are taken. (Sage and Carpenter, 2012 – Section 24)

WIRELESS WARNINGS FOR ALL

The continued rollout of wireless technologies and devices puts global public health at risk from unrestricted wireless commerce unless new, and far lower exposure limits and strong precautionary warnings for their use are implemented.
(Sage and Carpenter, 2012 – Section 24)

EMF AND RFR ARE PREVENTABLE TOXIC EXPOSURES

We have the knowledge and means to save global populations from multi-generational adverse health consequences by reducing both ELF and RFR exposures. Proactive and immediate measures to reduce unnecessary EMF exposures will lower disease burden and rates of premature death.
(Sage and Carpenter, 2012 – Section 24)

DEFINING A NEW 'EFFECT LEVEL' FOR RFR

On a precautionary public health basis, a reduction from the BioInitiative 2007 recommendation of 0.1 $\mu\text{W}/\text{cm}^2$ (or one-tenth of a microwatt per square centimeter) for cumulative outdoor RFR down to something three orders of magnitude lower (in the low nanowatt per square centimeter range) is justified.

A scientific benchmark of 0.003 $\mu\text{W}/\text{cm}^2$ or three nanowatts per centimeter squared for 'lowest observed effect level' for RFR is based on mobile phone base station-level studies. Applying a ten-fold reduction to compensate for the lack of long-term exposure (to provide a safety buffer for chronic exposure, if needed) or for children as a sensitive subpopulation yields a 300 to 600 picowatts per square centimeter precautionary action level. This equates to a 0.3 nanowatts to 0.6 nanowatts per square centimeter as a reasonable, precautionary action level for chronic exposure to pulsed RFR.

These levels may need to change in the future, as new and better studies are completed. We leave room for future studies that may lower or raise today's observed 'effects levels' and should be prepared to accept new information as a guide for new precautionary actions.

(Sage and Carpenter, 2012 – Section 24)

**Reported Biological Effects from Radiofrequency Radiation at Low-Intensity Exposure
(Cell Tower, Wi-Fi, Wireless Laptop and 'Smart' Meter RF Intensities)**

Power Density (Microwatts/centimeter ² - uW/cm ²)		Reference
0.5 uW/cm ²	Significant degeneration of seminiferous epithelium in mice at 2.45 GHz, 30-40 min.	Saunders, 1981
0.5 - 1.0 uW/cm ²	Wi-Fi level laptop exposure for 4-hr resulted in decrease in sperm viability, DNA fragmentation with sperm samples placed in petri dishes under a laptop connected via Wi-Fi to the internet.	Avendano, 2012
1.0 uW/cm ²	RFR induced pathological leakage of the blood-brain barrier	Persson, 1997
1.0 uW/cm ²	RFR caused significant effect on immune function in mice	Fesenko, 1999
1.0 uW/cm ²	RFR affected function of the immune system	Novoselova, 1999
1.0 uW/cm ²	Short-term (50 min) exposure in electrosensitive patients, caused loss of well-being after GSM and especially UMTS cell phone radiation exposure	Eltit, 2007
1.3 - 5.7 uW/cm ²	RFR associated with a doubling of leukemia in adults	Dolk, 1997
1.25 uW/cm ²	RFR exposure affected kidney development in rats (in-utero exposure)	Pyrrasopoulou, 2004
1.5 uW/cm ²	RFR reduced memory function in rats	Nittby, 2007
2 uW/cm ²	RFR induced double-strand DNA damage in rat brain cells	Kesari, 2008
2.5 uW/cm ²	RFR affected calcium concentrations in heart muscle cells	Wolke, 1996
2 - 4 uW/cm ²	Altered cell membranes; acetylcholine-induced ion channel disruption	D'Inzeo, 1988
4 uW/cm ²	RFR caused changes in hippocampus (brain memory and learning)	Tattersall, 2001
4 - 15 uW/cm ²	Memory impairment, slowed motor skills and retarded learning in children	Chiang, 1989
5 uW/cm ²	RFR caused drop in NK lymphocytes (immune function decreased)	Boscolo, 2001
5.25 uW/cm ²	20 minutes of RFR at cell tower frequencies induced cell stress response	Kwee, 2001
5 - 10 uW/cm ²	RFR caused impaired nervous system activity	Dumansky, 1974
6 uW/cm ²	RFR induced DNA damage in cells	Phillips, 1998

Stress proteins, HSP, disrupted immune function	Brain tumors and blood-brain barrier
Reproduction/fertility effects	Sleep, neuron firing rate, EEG, memory, learning, behavior
Oxidative damage/ROS/DNA damage/DNA repair failure	Cancer (other than brain), cell proliferation
Disrupted calcium metabolism	Cardiac, heart muscle, blood-pressure, vascular effects

**Reported Biological Effects from Radiofrequency Radiation at Low-Intensity Exposure
(Cell Tower, Wi-Fi, Wireless Laptop and 'Smart' Meter RF Intensities)**

Power Density (Microwatts/centimeter ² - uW/cm ²)		Reference
6.75 uW/cm ²	RFR at 900 MHz for 2-12 hours caused DNA breaks in leukemia cells	Marinelli, 2004
10 uW/cm ²	Changes in behavior (avoidance) after 0.5 hour exposure to pulsed RFR	Navakatikian, 1994
10 - 100 uW/cm ²	Increased risk in radar operators of cancer; very short latency period; dose response to exposure level of RFR reported	Richter, 2000
12.5 uW/cm ²	RFR caused calcium efflux in cells - can affect many critical cell functions	Dutta, 1989
13.5 uW/cm ²	RFR affected human lymphocytes - induced stress response in cells	Sanjov, 2004
20 uW/cm ²	Increase in serum cortisol (a stress hormone)	Mann, 1998
28.2 uW/cm ²	RFR increased free radical production in rat cells	Yurekli, 2006
37.5 uW/cm ²	Immune system effects - elevation of PFC count (antibody producing cells)	Veyret, 1991
45 uW/cm ²	Pulsed RFR affected serum testosterone levels in mice	Forgacs, 2006
50 uW/cm ²	Cell phone RFR caused a pathological leakage of the blood-brain barrier in 1-hour	Salford, 2003
50 uW/cm ²	An 18% reduction in REM sleep (important to memory and learning functions)	Mann, 1996
60 uW/cm ²	RFR caused structural changes in cells of mouse embryos	Somozy, 1991
60 uW/cm ²	Pulsed RFR affected immune function in white blood cells	Stankiewicz, 2006
60 uW/cm ²	Cortex of the brain was activated by 15 minutes of 902-MHz cell phone	Lebedeva, 2000
65 uW/cm ²	RFR affected genes related to cancer	Ivaschuk, 1999
92.5 uW/cm ²	RFR caused genetic changes in human white blood cells	Belyaev, 2005
100 uW/cm ²	Changes in immune function	Flekes, 1996
100 uW/cm ²	A 24.3% drop in testosterone after 6 hours of CW RFR exposure	Navakatikian, 1994
120 uW/cm ²	A pathological leakage in the blood-brain barrier with 915 MHz cell RF	Salford, 1994

Stress proteins, HSP, disrupted immune function	Brain tumors and blood-brain barrier
Reproduction/fertility effects	Sleep, neuron firing rate, EEG, memory, learning, behavior
Oxidative damage/ROS/DNA damage/DNA repair failure	Cancer (other than brain), cell proliferation
Disrupted calcium metabolism	Cardiac, heart muscle, blood-pressure, vascular effects

**Reported Biological Effects from Radiofrequency Radiation at Low-Intensity Exposure
(Cell Tower, Wi-Fi, Wireless Laptop and 'Smart' Meter RF Intensities)**

Power Density (Microwatts/centimeter ² - uW/cm ²)		Reference
As low as (10 ⁻¹³) or 100 femtowatts/cm ²	Super-low intensity RFR effects at MW resonant frequencies resulted in changes in genes; problems with chromatin conformation (DNA)	Belyaev, 1997
5 picowatts/cm ² (10 ⁻¹²)	Changed growth rates in yeast cells	Grundler, 1992
0.1 nanowatt/cm ² (10 ⁻¹⁰) or 100 picowatts/cm ²	Super-low intensity RFR effects at MW resonant frequencies resulted in changes in genes; problems with chromatin condensation (DNA) intensities comparable to base stations	Belyaev, 1997
0.00034 uW/cm ²	Chronic exposure to mobile phone pulsed RF significantly reduced sperm count.	Behari, 2006
0.0005 uW/cm ²	RFR decreased cell proliferation at 960 MHz GSM 217 Hz for 30-min exposure.	Velizarov, 1999
0.0006 - 0.0128 uW/cm ²	Fatigue, depressive tendency, sleeping disorders, concentration difficulties, cardio-vascular problems reported with exposure to GSM 900/1800 MHz cell phone signal at base station level exposures.	Oberfeld, 2004
0.003 - 0.02 uW/cm ²	In children and adolescents (8-17 yrs) short-term exposure caused headache, irritation, concentration difficulties in school.	Heinrich, 2010
0.003 to 0.05 uW/cm ²	In children and adolescents (8-17 yrs) short-term exposure caused conduct problems in school (behavioral problems)	Thomas, 2010
0.005 uW/cm ²	In adults (30-60 yrs) chronic exposure caused sleep disturbances, (but not significantly increased across the entire population)	Mohler, 2010
0.005 - 0.04 uW/cm ²	Adults exposed to short-term cell phone radiation reported headaches, concentration difficulties (differences not significant, but elevated)	Thomas, 2008
0.006 - 0.01 uW/cm ²	Chronic exposure to base station RF (whole-body) in humans showed increased stress hormones; dopamine levels substantially decreased; higher levels of adrenaline and nor-adrenaline; dose-response seen; produced chronic physiological stress in cells even after 1.5 years.	Buchner, 2012
0.01 - 0.11 uW/cm ²	RFR from cell towers caused fatigue, headaches, sleeping problems	Navarro, 2003

Stress proteins, HSP, disrupted immune function	Brain tumors and blood-brain barrier
Reproduction/fertility effects	Sleep, neuron firing rate, EEG, memory, learning, behavior
Oxidative damage/ROS/DNA damage/DNA repair failure	Cancer (other than brain), cell proliferation
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**Reported Biological Effects from Radiofrequency Radiation at Low-Intensity Exposure
(Cell Tower, Wi-Fi, Wireless Laptop and 'Smart' Meter RF Intensities)**

Power Density (Microwatts/centimeter ² - uW/cm ²)		Reference
0.01 - 0.05 uW/cm ²	Adults (18-91 yrs) with short-term exposure to GSM cell phone radiation reported headache, neurological problems, sleep and concentration problems.	Hutter, 2006
0.005 - 0.04 uW/cm ²	Adults exposed to short-term cell phone radiation reported headaches, concentration difficulties (differences not significant, but elevated)	Thomas, 2008
0.015 - 0.21 uW/cm ²	Adults exposed to short-term GSM 900 radiation reported changes in mental state (e.g., calmness) but limitations of study on language descriptors prevented refined word choices (stupified, zoned-out)	Augner, 2009
0.05 - 0.1 uW/cm ²	RFR linked to adverse neurological, cardiac symptoms and cancer risk	Khurana, 2010
0.05 - 0.1 uW/cm ²	RFR related to headache, concentration and sleeping problems, fatigue	Kundi, 2009
0.07 - 0.1 uW/cm ²	Sperm head abnormalities in mice exposed for 6-months to base station level RF/MW. Sperm head abnormalities occurred in 39% to 46% exposed mice (only 2% in controls) abnormalities was also found to be dose dependent. The implications of the pit-head and banana-shaped sperm head. This occurrence of sperm head observed increase occurrence of sperm head abnormalities on the reproductive health of humans living in close proximity to GSM base stations were discussed.	Otolaju, 2010
0.38 uW/cm ²	RFR affected calcium metabolism in heart cells	Schwartz, 1990
0.6 - 10 uW/cm ²	RFR caused emotional behavior changes, free-radical damage by super-weak MWs	Akoev, 2002
0.13 uW/cm ²	RFR from 3G cell towers decreased cognition, well-being	Zwamborn, 2003
0.16 uW/cm ²	Motor function, memory and attention of school children affected (Latvia)	Kolodynski, 1996
0.168 - 1.053 uW/cm ²	Irreversible infertility in mice after 5 generations of exposure to RFR from an 'antenna park'	Magras & Zenos, 1997
0.2 - 8 uW/cm ²	RFR caused a two-fold increase in leukemia in children	Hocking, 1996
0.2 - 8 uW/cm ²	RFR decreased survival in children with leukemia	Hocking, 2000
0.21 - 1.28 uW/cm ²	Adolescents and adults exposed only 45 min to UMTS cell phone radiation reported increases in headaches.	Riddervold, 2008

Stress proteins, HSP, disrupted immune function	Brain tumors and blood-brain barrier
Reproduction/fertility effects	Sleep, neuron firing rate, EEG, memory, learning, behavior
Oxidative damage/ROS/DNA damage/DNA repair failure	Cancer (other than brain), cell proliferation
Disrupted calcium metabolism	Cardiac, heart muscle, blood-pressure, vascular effects

**Reported Biological Effects from Radiofrequency Radiation at Low-Intensity Exposure
(Cell Tower, Wi-Fi, Wireless Laptop and 'Smart' Meter RF Intensities)**

Power Density (Microwatts/centimeter ² - uW/cm ²)		Reference
500 uW/cm ²	Intestinal epithelial cells exposed to 2.45 GHz pulsed at 16 Hz showed changes in intercellular calcium.	Somozy, 1993
500 uW/cm ²	A 24.6% drop in testosterone and 23.2% drop in insulin after 12 hrs of pulsed RFR exposure.	Navakatikian, 1994
STANDARDS		
530 - 600 uW/cm ²	Limit for uncontrolled public exposure to 800-900 MHz	ANSI/IEEE and FCC
1000 uW/cm ²	PCS STANDARD for public exposure (as of September 1, 1997)	FCC, 1996
5000 uW/cm ²	PCS STANDARD for occupational exposure (as of September 1, 1997)	FCC, 1996
BACKGROUND LEVELS		
0.003 uW/cm ²	Background RF levels in US cities and suburbs in the 1990s	Mantiply, 1997
0.05 uW/cm ²	Median ambient power density in cities in Sweden (30-2000 MHz)	Hamnerius, 2000
0.1 - 10 uW/cm ²	Ambient power density within 100-200' of cell site in US (data from 2000)	Sage, 2000

Stress proteins, HSP, disrupted immune function	Brain tumors and blood-brain barrier
Reproduction/fertility effects	Sleep, neuron firing rate, EEG, memory, learning, behavior
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**Reported Biological Effects from Radiofrequency Radiation at Low-Intensity Exposure
(Cell Tower, Wi-Fi, Wireless Laptop and 'Smart' Meter RF Intensities)**

SAR (Watts/Kilogram) ^{1,2}		Reference
0.000064 - 0.000078 W/Kg	Well-being and cognitive function affected in humans exposed to GSM-UMTS cell phone frequencies; RF levels similar near cell sites	TNO Physics and
0.00015 - 0.003 W/Kg	Calcium ion movement in isolated frog heart tissue is increased 18% (P<.01) and by 21% (P<.05) by weak RF field modulated at 16 Hz	Schwartz, 1990
0.000021 - 0.0021 W/Kg	Changes in cell cycle; cell proliferation (900 MHz GSM mobile phone)	Kwee, 1997
0.0003 - 0.06 W/Kg	Neurobehavioral disorders in offspring of pregnant mice exposed in utero to cell phones - dose-response impaired glutamatergic synaptic transmission onto layer V pyramidal neurons of the prefrontal cortex. Hyperactivity and impaired memory function in offspring. Altered brain development.	Aldad, 2012
0.0016 - 0.0044 W/Kg	Very low power 700 MHz CW affects excitability of hippocampus tissue, consistent with reported behavioral changes.	Tattersall, 2001
0.0021 W/Kg	Heat shock protein HSP 70 is activated by very low intensity microwave exposure in human epithelial amnion cells	Kwee, 2001
0.0024 - 0.024 W/Kg	Digital cell phone RFR at very low intensities causes DNA damage in human cells; both DNA damage and impairment of DNA is reported	Phillips, 1998
0.0027 W/Kg	Changes in active avoidance conditioned behavioral effect is seen after one-half hour of pulsed radiofrequency radiation	Navakatikian, 1994
0.0035 W/Kg	900 MHz cell phone signal induces DNA breaks and early activation of p53 gene; short exposure of 2-12 hours leads cells to acquire greater survival chance - linked to tumor aggressiveness.	Marinelli, 2004
0.0095 W/Kg	MW modulated at 7 Hz produces more errors in short-term memory function on complex tasks (can affect cognitive processes such as attention and memory)	Lass, 2002
0.001 W/Kg	750 MHz continuous wave (CW) RFR exposure caused increase in heat shock protein (stress proteins). Equivalent to what would be induced by 3 degree C. heating of tissue (but no heating occurred)	De Pomerai, 2000
0.001 W/Kg	Statistically significant change in intracellular calcium concentration in heart muscle cells exposed to RFR (900 MHz/50 Hz modulation)	Wolke, 1996

Stress proteins, HSP, disrupted immune function	Brain tumors and blood-brain barrier
Reproduction/fertility effects	Sleep, neuron firing rate, EEG, memory, learning, behavior
Oxidative damage/ROS/DNA damage/DNA repair failure	Cancer (other than brain), cell proliferation
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SAR (Watts/Kilogram)		Reference
0.0021 W/Kg	A significant change in cell proliferation not attributable to thermal heating. RFR induces non-thermal stress proteins (960 MHz GSM)	Velizarov, 1999
0.004 - 0.008 W/Kg	915 MHz cell phone RFR caused pathological leakage of blood-brain barrier. Worst at lower SAR levels and worse with CW compared to Frequency of pathological changes was 35% in rats exposed to pulsed radiation at 50% to continuous wave RFR. Effects observed at a specific absorption (SA) of > 1.5 joules/Kg in human tissues	Persson, 1997
0.0059 W/Kg	Cell phone RFR induces glioma (brain cancer) cells to significantly increase thymidine uptake, which may be indication of more cell division	Stagg, 1997
0.014 W/Kg	Sperm damage from oxidative stress and lowered melatonin levels resulted from 2-hr per day/45 days exposure to 10 GHz.	Kumar, 2012
0.015 W/Kg	Immune system effects - elevation of PFC count (antibody-producing cells)	Veyret, 1991
0.02 W/Kg	A single, 2-hr exposure to GSM cell phone radiation results in serious neuron damage (brain cell damage) and death in cortex, hippocampus, and basal ganglia of brain- even 50+ days later blood-brain barrier is still leaking albumin (P<.002) following only one cell phone exposure	Salford, 2003
0.026 W/Kg	Activity of c-Jun (oncogene or cancer gene) was altered in cells after 20 minutes exposure to cell phone digital TDMA signal	Ivaschuk, 1997
0.0317 W/Kg	Decrease in eating and drinking behavior	Ray, 1990
0.037 W/Kg	Hyperactivity caused by nitric oxide synthase inhibitor is countered by exposure to ultra-wide band pulses (600/sec) for 30 min	Seaman, 1999
0.037 - 0.040 W/Kg	A 1-hr cell phone exposure causes chromatin condensation; impaired DNA repair mechanisms; last 3 days (longer than stress response) the effect reaches saturation in only one hour of exposure; electro-sensitive (ES) people have different response in formation of DNA repair foci, compared to healthy individuals; effects depend on carrier frequency (915 MHz = 0.037 W/Kg but 1947 MHz = 0.040 W/Kg)	Belyaev, 2008
0.05 W/Kg	Significant increase in firing rate of neurons (350%) with pulsed 900 MHz cell phone radiation exposure (but not with CW) in avian brain cells	Beason, 2002

Stress proteins, HSP, disrupted immune function	Brain tumors and blood-brain barrier
Reproduction/fertility effects	Sleep, neuron firing rate, EEG, memory, learning, behavior
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**Reported Biological Effects from Radiofrequency Radiation at Low-Intensity Exposure
(Cell Tower, Wi-Fi, Wireless Laptop and 'Smart' Meter RF Intensities)**

SAR (Watts/Kilogram)		Reference
0.09 W/Kg	900 MHz study of mice for 7 days. 12-hr per day (whole-body) resulted in significant effect on mitochondria and genome stability	Aitken, 2005
0.091 W/Kg	Wireless internet 2400 MHz, 24-hrs per day/20 weeks increased DNA damage and reduced DNA repair levels below 802.11 g Authors say "findings raise questions about safety of radiofrequency exposure from Wi-Fi Internet access devices for growing organisms of reproductive age, with a potential effect on fertility and integrity of germ cells" (male germ cells are the reproductive cells=sperm)	Atasoy, 2012
0.11 W/Kg	Increased cell death (apoptosis) and DNA fragmentation at 2.45 GHz for 35 days exposure (chronic exposure study)	Kesari, 2010
0.121 W/Kg	Cardiovascular system shows significant decrease in arterial blood pressure (hypotension) after exposure to ultra-wide band pulses	Lu, 1999
0.13 - 1.4 W/Kg	Lymphoma cancer rate doubled with two 1/2-hr exposures per day of cell phone radiation for 18 months (pulsed 900 MHz cell signal)	Repacholi, 1997
0.14 W/Kg	Elevation of immune response to RFR exposure	Elekes, 1996
0.141 W/Kg	Structural changes in testes - smaller diameter of seminiferous	Dasdag, 1999
0.15 - 0.4 W/Kg	Statistically significant increase in malignant tumors in rats chronically exposed to RFR	Chou, 1992
0.26 W/Kg	Harmful effects to the eye/certain drugs sensitize the eye to RFR	Kues, 1992
0.28 - 1.33 W/Kg	Significant increase in reported headaches with increasing use of hand-held cell phone use (maximum tested was 60 min per day)	Chia, 2000
0.3 - 0.44 W/Kg	Cell phone use results in changes in cognitive thinking/mental tasks related to memory retrieval	Krauss, 2000
0.3 - 0.44 W/Kg	Attention function of brain and brain responses are speeded up	Preece, 1999
0.3 - 0.46 W/Kg	Cell phone RFR doubles pathological leakage of blood-brain barrier permeability at two days (P=.002) and triples permeability at four days (P=.001) at 1800 MHz GSM cell phone radiation	Schirmacher, 2000
0.43 W/Kg	Significant decrease in sperm mobility; drop in sperm concentration; and decrease in seminiferous tubules at 800 MHz, 8-hr/day, 12 weeks, with mobile phone radiation level on STANDBY ONLY (in rabbits)	Salama, 2008

Stress proteins, HSP, disrupted immune function	Brain tumors and blood-brain barrier
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**Reported Biological Effects from Radiofrequency Radiation at Low-Intensity Exposure
(Cell Tower, Wi-Fi, Wireless Laptop and 'Smart' Meter RF Intensities)**

SAR (Watts/Kilogram)		Reference
0.5 W/Kg	900 MHz pulsed RF affects firing rate of neurons (<i>Lymanea stagnalis</i>) but continuous wave had no effect	Bolshakov, 1992
0.58 - 0.75 W/Kg	Decrease in brain tumors after chronic exposure to RFR at 836 MHz	Adey, 1999
0.6 - 0.9 W/Kg	Mouse embryos develop fragile cranial bones from in utero 900 MHz The authors say "(O)ur results clearly show that even modest exposure (e.g., 6 min daily for 21 days" is sufficient to interfere with the normal mouse developmental process"	Fragopoulou, 2009
0.6 and 1.2 W/Kg	Increase in DNA single and double-strand DNA breaks in rat brain cells with exposure to 2450 MHz RFR	Lai & Singh, 1996
0.795 W/Kg	GSM 900 MHz, 217 Hz significantly decreases ovarian development and size of ovaries, due to DNA damage and premature cell death of nurse cells and follicles in ovaries (that nourish egg cells)	Panagopoulous, 2012
0.87 W/Kg	Altered human mental performance after exposure to GSM cell phone radiation (900 MHz TDMA digital cell phone signal)	Hamblin, 2004
0.87 W/Kg	Change in human brainwaves; decrease in EEG potential and statistically significant change in alpha (8-13 Hz) and beta (13-22 Hz) brainwave activity in humans at 900 MHz; exposures 6/min per day for 21 days (chronic exposure)	D'Costa, 2003
0.9 W/Kg	Decreased sperm count and more sperm cell death (apoptosis) after 35 days exposure, 2-hr per day	Kesari, 2012
< 1.0 W/Kg	Rats exposed to mobile phone radiation on STANDBY ONLY for 11-hr 45-min plus 15-min TRANSMIT mode; 2 times per day for 21 days showed decreased number of ovarian follicles in pups born to these pregnant rats. The authors conclude "the decreased number of follicles in pups exposed to mobile phone microwaves suggest that intrauterine exposure has toxic effects on ovaries."	Gul, 2009
0.4 - 1.0 W/Kg	One 6-hr exposure to 1800 MHz cell phone radiation in human sperm cells caused a significant dose response and reduced sperm motility and viability; reactive oxygen species levels were significantly increased after exposure to 1.0 W/Kg; study confirms detrimental effects of RF/MW to human sperm. The authors conclude "(T)hese findings have clear implications for the safety of extensive mobile phone use by males of reproductive age, potentially affecting both their fertility and the health and wellbeing of their offspring."	De Iuliis, 2009
1.0 W/Kg	Human semen degraded by exposure to cell phone frequency RF increased free-radical damage.	De Iuliis, 2009

Stress proteins, HSP, disrupted immune function	Brain tumors and blood-brain barrier
Reproduction/fertility effects	Sleep, neuron firing rate, EEG, memory, learning, behavior
Oxidative damage/ROS/DNA damage/DNA repair failure	Cancer (other than brain), cell proliferation
Disrupted calcium metabolism	Cardiac, heart muscle, blood-pressure, vascular effects

**Reported Biological Effects from Radiofrequency Radiation at Low-Intensity Exposure
(Cell Tower, Wi-Fi, Wireless Laptop and 'Smart' Meter RF Intensities)**

SAR (Watts/Kilogram)		Reference
1.0 W/Kg	Motility, sperm count, sperm morphology, and viability reduced in active cell phone users (human males) in dose-dependent manner.	Agarwal, 2008
1.0 W/Kg	GSM cell phone use modulates brain wave oscillations and sleep EEG	Huber, 2002
1.0 W/Kg	Cell phone RFR during waking hours affects brain wave activity. (EEG patterns) during subsequent sleep	Achermann, 2000
1.0 W/Kg	Cell phone use causes nitric oxide (NO) nasal vasodilation (swelling inside nasal passage) on side of head phone use	Paredi, 2001
1.0 W/Kg	Increase in headache, fatigue and heating behind ear in cell phone users	Sandstrom, 2001
1.0 W/Kg	Significant increase in concentration difficulties using 1800 MHz cell phone compared to 900 MHz cell phone	Santini, 2001
1.0 W/Kg	Sleep patterns and brain wave activity are changed with 900 MHz cell phone radiation exposure during sleep	Borbely, 1999
1.4 W/Kg	GSM cell phone exposure induced heat shock protein HSP 70 by 360% (stress response) and phosphorylation of ELK-1 by 390%	Weisbrodt, 2003
1.46 W/Kg	850 MHz cell phone radiation decreases sperm motility, viability is significantly decreased; increased oxidative damage (free-radicals) significantly decreased; increased oxidative damage (free-radicals)	Agarwal, 2009
1.48 W/Kg	A significant decrease in protein kinase C activity at 112 MHz with 2-hr per day for 35 days; hippocampus is site, consistent with reports that RFR negatively affects learning and memory functions	Paulraj, 2004
1.0 - 2.0 W/Kg	Significant elevation in micronuclei in peripheral blood cells at 2450 MHz (8 treatments of 2-hr each)	Trosic, 2002
1.5 W/Kg	GSM cell phone exposure affected gene expression levels in tumor suppressor p53-deficient embryonic stem cells, and significantly increased HSP 70 heat shock protein production	Czyz, 2004
1.8 W/Kg	Whole-body exposure to RF cell phone radiation of 900-1800 MHz 1 cm from head of rats caused high incidence of sperm cell death; deformation of sperm cells; prominent clumping together of sperm cells into "grass bundle shapes" that are unable to separate/swim. Sperm cells unable to swim and fertilize in normal manner.	Yan, 2007

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SAR (Watts/Kilogram)		Reference
2.0 W/Kg	GSM cell phone exposure of 1-hr activated heat shock protein HSP 27 (stress response) and P38 MAPK (mutagen-activated protein kinase) that authors say facilitates brain cancer and increased blood-brain barrier permeability, allowing toxins to cross BBB into brain	Leszczynski, 2002
2 W/Kg	900 MHz cell phone exposure caused brain cell oxidative damage by increasing levels of NO, MDA, XO and ADA in brain cells; caused statistically significant increase in 'dark neurons' or damaged brain cells in cortex, hippocampus and basal ganglia with a 1-hr exposure for 7 consecutive days	Ilhan, 2004
2.6 W/Kg	900 MHz cell phone exposure for 1-hr significantly altered protein expression levels in 38 proteins following irradiation; activates P38 MAP kinase stress signalling pathway and leads to changes in cell size and shape (shrinking and rounding up) and to activation of HSP 27, a stress protein (heat shock protein)	Leszczynski, 2004
2.0 - 3.0 W/Kg	RFR accelerated development of both skin and breast tumors	Szmigielski, 1982
2 W/Kg	Pulse-modulated RFR and MF affect brain physiology (sleep study)	Schmidt, 2012

STANDARDS		
0.08 W/Kg	IEEE Standard uncontrolled public environment (whole body)	IEEE
0.4 W/Kg	IEEE Standard controlled occupational environment (whole body)	IEEE
1.6 W/Kg	FCC (IEEE) SAR limit for 1 gram of tissue in a partial body exposure	FCC, 1996
2 W/Kg	ICNIRP SAR limit for 10 grams of tissue	ICNIRP, 1996

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