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John F. Ryan, Acting Director
Public Health Directorate
Health and Consumers Directorate General
European Commission,
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SCENIHR Preliminary Report on Potential Health Effects of Exposure to Electromagnetic Fields (EMF)

Sent Via Email

Dear Mr. Ryan:

The concern about the 2014 SCENIHR Preliminary Report has been swift, severe, and global. It causes those who know the science and comprehend the potential for harm from microwave radiation to ask if SCENIHR is truly a body worth listening to, or has it lost all credibility. In hopes that all is not lost, I am writing to express my profound concern that industry-bias is destroying the ability of standard-setting bodies to protect the citizens of Europe, and indirectly, citizens on a global scale.

As an Advisor to the UK's Radiation Research Trust (RRT), I am following up on RRT Director Eileen O'Connor's recent letter to you asking for a thorough review of the SCENIHR Preliminary Report and the process itself by which science is selected for consideration. I contend the current selection process by SCENIHR is suggestive of a pattern of scientific fraud that is intended to suppress high quality science in order to preserve the way the telecommunications industry conducts business. The question must be asked if both SCENIHR and the World Health Organization are being influenced or controlled by the same interests and individuals who favor industry profits over their charge of protecting the public health.

No fewer than 500 million citizens of the European Commission are relying on SCENIHR for review of the current EMF standards, which have already been criticized as being set more than a thousand times higher than the level at which adverse biological impacts occur. When standards are set this high, it allows the manufacturers to falsely yet legally assure consumers, "There is no health problem or safety concern as the level of exposure is 1/1000th of what is allowable." Thus there is the promise of safety, which is only an illusion because so-called "safety standards" are

set capriciously high to begin with. There is no legitimate, independent science that will declare the current standards are safe. Absolutely none.

In my opinion and that of many others, the 2014 SCENIHR Preliminary Report inaccurately and, in part, fraudulently assesses the existing science. It ignores the new science by Lennart Hardell (five studies in 2013) in which he calls for radiofrequency RF - EMF to be classified a Group 1 carcinogen. Yet rarely has "dismissing" a group of studies shone the spotlight on them so brightly. It is causing people around the world to ask what is so significant about these new Hardell studies. The answer to that question may shed some light on the inner-workings and true motivation behind some key SCENIHR scientists.

It was the Hardell Group's earlier science that IARC, the World Health Organization's cancer committee, used along with the Interphone Study before declaring a 2B classification in May 2011 for all EMF within the RF Spectrum. The newer Hardell epidemiological studies cover more than 20 years, something no similar study has ever done, and the results are so convincing that Lennart Hardell states in his conclusion that RF - EMF should be urgently upgraded to a human carcinogen with no "possible" or "probable" qualifications. Dr. Hardell makes the case that RF radiation belongs in the Group 1 human carcinogen category.

By ignoring Hardell's science, SCENIHR attempts to marginalize and even suppress the Hardell Group's science which could change the way the world—consumers, courts, and governments alike—view the use of wireless in today's world. Why would SCENIHR, a group composed predominantly of industry-friendly scientists, work so hard to pretend they "had not received" or "did not like the methodology of the epidemiology" of the 2013 Hardell studies? There is a possible answer to this question. A Group 1 or even a 2A classification changes the "causation" argument in cell phone/brain tumor court cases, and will make it easier for victims who have developed brain tumors related to cell phone usage to prevail in the courts. When consumers prevail in the courts, it may force the mobile industry toward a more cost effective manufacturing decision to shield mobile phones and find safer ways (e.g., fiber optics) to replace microwave signal transmissions. It would, at least in the short run, increase costs for the mobile industry and decrease profits. I believe the Hardell Group's 2013 studies are game-changing, and as such, the industry wants this science suppressed.

To further the concern that SCENIHR is not operating in good faith, the one scientist who was touted by SCENIHR as being their proof of objectivity is Dr. Kjell Hansson Mild of Sweden. Dr. Hansson Mild is one of the co-authors along with Dr. Lennart Hardell in four of the five studies published in 2013 and subsequently ignored by both the World Health Organization (WHO) in its *2014 World Cancer Report* and SCENIHR. For SCENIHR to pin their reputation as an objective body on the presence of Dr. Hansson Mild, and then to ignore five Hardell studies, four of which were co-authored by Dr. Mild himself, is the height of hypocrisy. It casts a deep shadow of doubt on SCENIHR's Report. I am aware that Dr. Hansson Mild has come forward with a letter detailing his attempts to have the 2013 Hardell Group science included in SCENIHR's report, and his efforts were denied. He described bringing the Hardell Group studies to the attention of Dr. Joachim Schüz, in particular. These papers were delivered within the time frame for acceptance of publication and are relevant as they provide evidence of the link between mobile phone use and glioma and acoustic neuroma. The Hardell papers were systematically

disregarded while SCENIHR relies heavily on the much criticized Danish cohort study using poor exposure data. [See Söderqvist F, Carlberg M, Hardell L. Review of four publications on the Danish cohort study on mobile phone subscribers and risk of brain tumors. Reviews Environmental Health. 2012; 27: 51-58.]

When another highly criticized study was sent to SCENIHR [Benson et al, with Joachim Schüz as a co-author], including two reports that were published during the same time or even *after* the Hardell studies, it was included in the SCENIHR Preliminary Report. This study failed to find a link between cell phones and cancer, and when it initially did find a link between cell phones and acoustic neuroma, the authors, including Schüz, failed to discuss it in the Abstract. The systematic inclusion of poor quality science with industry backing, and the systematic exclusion of Hardell's science, allowed SCENIHR to come to an erroneous conclusion that evidence for glioma is weaker now than in 2009. This sort of "cherry-picking" favors industry profits over consumer protection and thus the SCENIHR Report should not even be considered science.

This is not "independence" on SCENIHR's part. This is scientific misconduct. SCENIHR is claiming to be something it is not, and hundreds of millions of lives are at stake as well as the ability to impact standards worldwide, albeit indirectly.

It is important to note that Dr. Joachim Schüz has been named as the key person to whom Hardell's science was delivered and summarily dismissed, both as Head of IARC's Section of Environment and Radiation and as a SCENIHR Committee Member. As Dr. Mild wrote to you in a letter dated 28 April 2014: "It must be clearly stated that Dr Schüz refused to include these studies in SCENIHR and that the omission is his responsibility." Dr. Mild elaborates: "[Schüz] clearly stated that the epidemiological part was solely his responsibility to write and furthermore he himself was to decide what to include." It is also important to note that Schüz has received industry funding for much of his participation in studies such as Interphone and COSMOS which had predictable findings. Should Dr. Schüz's influence continue to be felt at SCENIHR, and by the same token, at IARC?

Gratefully, the BioInitiative Working Group is offering us an alternative that is receiving increasing recognition and respect around the world and, as you know from Cindy Sage's recent letter to you, BioInitiative has done a thorough review of SCENIHR's Report and issued its response. I am offering the link to the BioInitiative Working Group's letter commenting on the 2014 SCENIHR Preliminary Report. http://www.bioinitiative.org/potential-health-effects-emf/

Mona Nilsson on behalf of the Swedish Radiation Protection Foundation submitted her comments to SCENIHR on 16 April 2014, and they are well-worth reading. I have attached Ms. Nilsson's comments, in which she writes to SCENIHR: "The Preliminary Opinion of SCENIHR gives a false and even fraudulent presentation of research results and statistical data. Critical data are abundantly omitted or ignored. Studies and results showing health risks from radiofrequency and low frequency radiation are misrepresented. Studies showing no risks with severe limitations and errors are instead presented without any relevant criticism."

I join the RRT's Director Eileen O'Connor, Cindy Sage on behalf of the BioInitiative Working Group, Mona Nilsson of the Swedish Radiation Protection Foundation, and scores of others in calling upon the European Commission to investigate possible conflicts of interest on the part of

SCENIHR scientists, and to demand a thorough investigation of the selection process of science for the 2014 SCENIHR Preliminary Report. I also call for a new unbiased evaluation of health risks from RF - EMF by SCENIHR.

Respectfully Yours,

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Advisor, Radiation Research Trust (UK)
Medical Writer

Cc: Eileen O'Connor
Lennart Hardell, MD, PhD
Kjell Hansson Mild, PhD
Cindy Sage, MA
IARC Ethics Committee
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