

## **Complaint to the HPA concerning failure to provide appropriate precautionary advice regarding radiofrequency electromagnetic fields**

**Following the World Health Organisation's International Agency for Research on Cancer (IARC) classification of radiofrequency electromagnetic fields as Group 2B possibly carcinogenic to humans<sup>1</sup>, we, the undersigned organisations and individuals, hereby formally lodge a complaint to and against the Health Protection Agency with regard to their failure to provide appropriate precautionary advice on pulsed microwave-emitting technologies *other than mobile phones*, particularly the use of wireless networks in schools and homes, and Smart Meters in homes and small businesses.**

In addition, we wish to further include a complaint about the absence of any reference to the IARC classification of radiofrequency electromagnetic fields as a Group 2B possible human carcinogen in their recent submission to the Commons Select Committee Inquiry into Smart Meter Roll-out. This is a particularly serious omission in view of the fact that the presently proposed smart meter roll-out would affect the entire population as even those who opt out would be exposed to the pulsed radiofrequency microwaves of meters in their neighbourhood.

In the HPA response<sup>2</sup> to the IARC statement, dated 31 May 2011 –

*"HPA advice is that there is no clear scientific evidence of a cancer risk from exposure to radiofrequencies at levels below international guidelines but the possibility remains. The HPA has always advocated some precaution in the use of mobile phones in case there are long term effects which are presently unknown. Given the possibility of long term cancer effects, excessive use of mobile phones by children should be discouraged (emphasis added)."*

However, when referring to Wi-Fi –

*"HPA advice on the use of wireless networks in schools and elsewhere is also consistent with this classification. Exposures from Wi-Fi equipment are much less than from mobile phones, and are well within international guidelines, so there is no reason why schools and others should not continue to use the technology (emphasis added)."*

Likewise, in the HPA smart meter information sheet<sup>3</sup> –

*"HPA acknowledges that there remain some areas of scientific uncertainty and HPA's advice takes this into account (emphasis added)."*

Nevertheless -

*"HPA consider exposure to radio waves does not provide a basis to decline having a smart meter (emphasis added)".*

This is justified by stating that –

"Using mobile phones leads to greater exposures than other radio devices in widespread use by the general public, including smart meters (emphasis added)".

Failure to promote precaution in the case of other wireless technologies such as Wi-Fi and smart meters cannot be justified on the grounds that exposures are less than from mobile phones. This does not take into account the fact that exposure from Wi-Fi in schools and smart meters is constant whereas mobile phone exposure only occurs during phone calls. Furthermore, mobile phone exposure is voluntary<sup>4</sup> whereas in the case of Wi-Fi in schools and smart meters in homes it is involuntary, i.e. people are being forced to be exposed to the pulsed microwaves and cannot choose to exercise precaution. This is arguably a violation of the Right to Health Protection as outlined in Section 4 of the article 'Precautionary Environmental Protection and Human Rights' (2007).<sup>5</sup>

The HPA has failed to mention that studies have reported biological effects of Wi-Fi and similar wireless signals in humans. Such evidence, whilst limited, is important for enabling adults and schools to make choices about whether they wish to reduce their exposures, from an informed position.

Regarding the recent (February 2013) written evidence<sup>6</sup> submitted by the HPA to the Commons Select Committee Inquiry into Smart Meter Roll-out, although links were provided to some relevant documents, there was *no reference whatsoever* in the submitted document to the fact that radiofrequency electromagnetic fields have been classified as possibly carcinogenic to humans. The HPA mentioned a precautionary approach in their response to the 2012 AGNIR Report<sup>7</sup>, i.e.

*"Excessive use of mobile phones by children should be discouraged, while adults should make their own choices as to whether they wish to reduce their exposures, but be enabled to do this from an informed position (emphasis added)."*

However, when referring to this report in the recent submission to the Commons Select Committee only the 'main conclusion' of AGNIR was quoted where it was stated that

*"although a substantial amount of research has been conducted in this area, there is no convincing evidence that radio wave exposures below the ICNIRP guideline levels cause health effects in adults or children (emphasis added)."*<sup>8</sup>

In 2011 the IARC concluded that there was enough convincing evidence that radio wave exposures below the ICNIRP guideline levels might cause cancer to classify radiofrequencies as a Class 2B possible human carcinogen. The Commons Select Committee Inquiry into Smart Meter Roll-out, as well as the general public, would be better enabled to make informed choices about wireless technologies if the HPA had mentioned the decision of the IARC and offered appropriate precautionary advice.

- 1 [http://www.iarc.fr/en/media-centre/pr/2011/pdfs/pr208\\_E.pdf](http://www.iarc.fr/en/media-centre/pr/2011/pdfs/pr208_E.pdf)
- 2 <http://www.hpa.org.uk/NewsCentre/NationalPressReleases/2011PressReleases/11053>  
1electromagneticfields/
- 3 <http://www.hpa.org.uk/Topics/Radiation/UnderstandingRadiation/Understanding>  
RadiationTopics/ElectromagneticFields/SmartMeters/
- 4 Passive RF exposure to mobile phones can be involuntary.
- 5 <http://www.juridicainternational.eu/index.php?id=12686>
- 6 <http://data.parliament.uk/writtenevidence/WrittenEvidence.svc/EvidencePdf/445>
- 7 <http://www.hpa.org.uk/Publications/Radiation/HPAResponseStatementsOnRadiation>  
Topics/radresp\_AGNIR2012/
- 8 It should be pointed out that we strongly disagree with this AGNIR statement. A large body of published scientific data has found that pulsed radiofrequency microwaves below the guideline levels can cause biological and adverse health effects, although many of these papers were omitted from the AGNIR 2012 report. Many studies were described in the Bioinitiative Report 2007 and 2012<sup>9</sup> and the Ecolog Report (2000)<sup>10</sup>. As stated in the Benevento Resolution (2006) from the International Commission for Electromagnetic Safety, "Arguments that weak (low intensity) EMF cannot affect biological systems do not represent the current spectrum of scientific opinion."<sup>11</sup>
- 9 <http://www.bioinitiative.org/>
- 10 <http://www.hese-project.org/hese-uk/en/papers/ecolog2000.pdf>
- 11 [http://www.icems.eu/benevento\\_resolution.htm](http://www.icems.eu/benevento_resolution.htm)

Signed by

Organisations

BEMRI (Bio Electromagnetic Research Initiative) [www.bemri.org](http://www.bemri.org)

CAVI (Children As Victims Inquiry) Society [www.cavisoc.org.uk](http://www.cavisoc.org.uk)

Electric Forester Investigations Ltd <http://www.electricforester.co.uk>

ElectroSensitivity UK [www.es-uk.info](http://www.es-uk.info)

FoodsMatter [www.foodsmatter.com](http://www.foodsmatter.com)

Interconnections [www.teamaroundthechild.com](http://www.teamaroundthechild.com)

International EMF Alliance <http://www.iemfa.org>

Mast Sanity [www.mastsanity.org](http://www.mastsanity.org)

Mast-Victims [www.mast-victims.org](http://www.mast-victims.org)

MobileWise [www.mobilewise.org](http://www.mobilewise.org)

Powerwatch [www.powerwatch.org.uk](http://www.powerwatch.org.uk)

EM Radiation Research Trust [www.radiationresearch.org](http://www.radiationresearch.org)

SSITA (Safe Schools Information Technology Alliance) [www.ssita.org.uk](http://www.ssita.org.uk)

Stop Smart Meters! (UK) <http://stopsmartmeters.org.uk>

Wifi in Schools <http://wifiinschools.org.uk>

WiredChild [www.wiredchild.org](http://www.wiredchild.org)

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Many other people who work alongside us would very much have liked to have signed this complaint, but because of career considerations, or the need to protect their or their children's privacy, have understandably declined to do so. The above signatures therefore only constitute a sample list of people within the above organisations who in fact endorse this document in spirit.