

22 September 2014

John F. Ryan, Acting Director
Public Health Directorate
Health and Consumers Directorate General
European Commission,
L-2920 Luxembourg
Sent Via Email

Subject: IN ORDER TO ENSURE THE TRANSPARENCY, IMPARTIALITY AND PLURALITY OF EXPERT ASSESSMENTS IN THE SCENIHR

Dear Mr. John Ryan:

I am writing as President of the Association AVAATE -Asociación Vallisoletana de Afectados por Antenas de Telecomunicaciones, registered under number G47-501739 and domiciled in calle Andrés de la Orden, S/N, Valladolid, Spain, 47003, and on behalf of the Coordination Group of the Plataforma Estatal Contra la Contaminación Electromagnética (PECCCEM), email address coordinacion@pecccem.org, to communicate the following:

From our Association and the Plataforma Estatal Contra la Contaminación Electromagnética we are very worried about the implications on health of electromagnetic waves emitted by cellphone towers and wireless devices (including mobile phones).

As you know, by Commission Decision of 11 March 2013 was appointed members to the 2013-2016 period of the three Scientific Committees established by Decision 2008/721 / EC. One of those Committees is the Scientific Committee on Emerging and Newly Identified Health Risks (SCENIHR), that works diverse areas of activity, one of them are the risks caused by electromagnetic fields.

Members who were appointed to the Scientific Committee on Emerging and Newly Identified Health Risks (2013-2016):

- DEKANT Wolfgang: University of Würzburg, Würzburg, Germany (He resigned as a member of the Committee).
- EMRI Igor: University of Ljubljana, Ljubljana, Slovenia.
- EPSTEIN Michelle: Medical University of Vienna, Vienna, Austria.
- HARTEMANN Philippe: Université Nancy Lorraine, Nancy, France.
- HOET Peter: Katholieke Universiteit Leuven, Leuven, Belgium.
- LEITGEB Norbert: Graz University of Technology, Graz, Austria.
- MARTÍNEZ MARTÍNEZ Luis: University hospital of Cantabria, Santander, Spain.
- PROYKOVA Ana: University of Sofia, Sofia, Bulgaria.
- RIZZO Luigi: University of Salerno, Fisciano, Italy.
- RODRIGUEZ-FARRÉ Eduardo: Superior Council for Scientific Research, Madrid, Spain.
- RUSHTON Lesley: Imperial College London, London, United Kingdom.
- RYDZYNSKI Konrad: Nofer Institute of Occupational Medicine, Lodz, Poland.
- SAMARAS Theodoros: Aristotle University of Thessaloniki, Thessaloniki, Greece.
- TESTAI Emanuela: Istituto Superiore di Sanità, Rome, Italy.
- VERMEIRE Theo: National Institute for Public Health and the Environment (RIVM), Bilthoven, The Netherlands.

Of the members of this Committee (2013-2016), we analyzed their Curriculum Vitae and statements currently published on web page http://ec.europa.eu/health/scientific_committees/emerging/members_committee/index_en.htm, in order to check the degree of specific qualifications for the scope of the risks caused by electromagnetic waves. We have reflected the result of this analysis in Annex I of this paper. As can be seen, of the fourteen members who are currently part of this Committee, only two of them (Prof. Dr. Theodoros Samaras and Dr Norbert Leitgeb) have in their curriculum various studies made in the area of risks from electromagnetic fields. The other expert hasn't works in this area of knowledge (only could be said of others in this field that Prof. Ana Proykova teaches medical physics since 2006 that include, among other things, the influences of radiation in the tissues, and that Dr. Rodriguez Farré has some training in radiology). Besides the above, this obviously attracts attention, even knowing that this Committee is dedicated to other scientific areas, in the case of Professor Theodoros Samaras appears in his Declaration of interest as Consultant/Advisor for various projects of the Greek group of phone company Vodafone (Vodafone-Pasnafon), which can obviously affect his independence. Without prejudging, we must not forget that, these days, the independence must be demonstrated, credible and transparent on the basis of external indications.

Under the protection of the Scientific Committee, there is a Working Group on EMF (electromagnetic waves) which includes one hand Professor Theodoros Samaras (as Chairman of the Working Group and the only member of the Committee on the same, despite independence problem cited above), and on the other the following external experts: Prof. Anssi Auvinen, Prof. Dra. Heidi Danker-Hopfe, Dr. Kjell Hansson Mild, Prof. Mats-Olof Mattsson, Dr. Hannu Norppa, Dr. James Rubin, Dra. Maria Rosaria Scarfi, Dr. Joachim Schütz, Dr. Zenon Sienkiewicz, Dra. Olga Zeni.

Of all the members that are currently part of this Working Group (2013-2016), we analyzed the statements currently published on web page http://ec.europa.eu/health/scientific_committees/emerging/members_wg/index_en.htm# (Statements only, in this case we do not know the reason but do not include Curriculum Vitae), in order to check their level of qualification for the field of risks from electromagnetic fields. We have also done research about the literature and work done by them. We have reflected the result of this analysis in Annex II of this writing. Of the 11 members of the Working Group (including its president), we have observed that all, except Dr. Hannu Norppa, have works in the area of electromagnetic fields. However, the main problem which we found in the Working Group is that, according to their statements, all except Dr. Hannu Norppa and Prof. Dr. Heidi Danker-Hopfe, have participated or received funding in different moments (and sometimes even today) with/from Organizations or Companies interested in the development of telecommunications (See Annex II).

In view of the above, we sincerely believe that the configuration of the expert panels designed for health problems that are behind the electromagnetic fields do not meet the requirements of specific qualification on the subject (in the case of members the Committee, except for professor Theodoros Samaras, who has a serious compatibility problem, and partly for the other three listed exceptions), and the requirements for independence (in the case of the Working Group, where only appear as formally independents Dr. Hannu Norppa and Professor Dr. Heidi Danker-Hopfe).

We know that there are sufficient global and European experts on risk level electromagnetic really independent. Furthermore, in the case of the Committee, would be necessary to have a larger number of members, specialists in the field, something that really only are three of its members.

The Communication from the European Commission on December 11, 2002 (COMMUNICATION FROM THE COMMISSION ON THE COLLECTION AND USE OF EXPERTISE BY THE COMMISSION: PRINCIPLES AND GUIDELINES "Improving the knowledge base for better policies"), clearly states that should be minimized the risk of interests distorting the advice (fifth paragraph on page 9), recognizing in the first paragraph on page 16 working for a company as a possible cause of exclusion to affect the objectivity of.

In Recital (7) of COMMISSION DECISION of 2008 setting up an advisory structure of Scientific Committees and experts in the field of consumer safety, public health and the environment and repealing states that “The scientific advice on matters relating to consumer safety, public health and the environment must be based on the principles of excellence, independence and impartiality, and transparency, as developed in the Commission Communication on ‘The collection and use of expertise by the Commission: principles and guidelines. Improving the knowledge for better policies’”.

The Rules of Operation of the Committees, also published on the website of the European Commission, it is emphasized that members and experts should be in a position to guarantee their independence of judgment, which does not seem to be predicated of persons that in the present or in the past have participated or received money with/from certain Organizations or Companies interested in the development of telecommunications.

Given the above **it is requested** that from this time and before any new scientific opinion of the Scientific Committee on Emerging health risks newly identified or Working Group on EMF occurs, you would make a new selection of experts for both bodies in the area of the risks caused by electromagnetic waves.

We join the scientists, researchers and experts, as well as professional bodies and associations and representatives of civil society organizations, who signed the “[Manifesto of the European Citizens' Initiative \(ECI\) on Electromagnetic Radiation](#)” (2013) in favour of a precautionary regulation of the EMF exposure. This Manifesto defends the transparency, impartiality and plurality of expert assessments on health risks of non-ionizing electromagnetic fields (EMF), within the meaning of item 7 [Resolution 1815 \(2011\) of the Parliamentary Assembly of the Council of Europe \(PACE\)](#), at all levels of decision including the appointment of experts, the presentation of alternative scientific interpretations and the inclusion of the "views" of citizenship with the presence of the relevant groups in this area in implementation of the [Aarhus Convention \(1998\)](#).

We also join [Eileen O'Connor](#) and [Susan Foster](#) of the EM Radiation Research Trust, [Cindy Sage](#) on behalf of the BioInitiative Working Group, [Mona Nilsson](#) of the Swedish Radiation Protection Foundation, [Iris Atzmonh](#), 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.

With Great Respect,

Asunción Laso Prieto

President of the AVAATE (www.avaate.org)

Member of the Coordinating Group of the PECEEM (*) <http://www.peccem.org>

Cc: IEMFA International EMF Alliance

Cco: The signatories of the “Manifesto of the European Citizens' Initiative (ECI) on Electromagnetic Radiation” in favour of a precautionary regulation of the EMF exposure

(*) The Plataforma Estatal Contra la Contaminación Electromagnética is composed of Spanish civil society organizations (neighbours -more than 3,500 associations-, environmentalists and ecologists -more than 300 groups-, school parents, electro-hypersensitive, of health advocacy and against electromagnetic pollution, etc.), in different Autonomous Communities (Spanish State).

ANNEX I

SCIENTIFIC COMMITTEE MEMBERS OF EMERGING AND NEWLY IDENTIFIED HEALTH RISKS

Prof. Igor Emri. Professor, Faculty of Mechanical Engineering, University of Ljubljana (Slovenia). His entire curriculum and work revolve around Mechanical Engineering (especially regarding polymer materials). We have not found works in the area of risks from electromagnetic fields.

Dr. Michelle Epstein. Works on research in the area of "Allergy and Immunology" at the Medical University of Vienna (Austria). She has a background in biochemistry, organic chemistry, medicine and internal medicine. She has worked on projects in transgenic animal feed. Her main activity is on basic mechanisms of allergy and immunologic in relation to food and implantation of biomaterials diseases.

Prof. Philippe Hartemann. Professor of Public Health, Faculty of Medicine, University of Lorraine, Nancy (France). He has a background in Biochemistry, Medicine, Microbiology and Public Health (the latter at the Pasteur Institute in Paris).

After conducting scientific studies of chemistry and biochemistry at Strasbourg, he entered the School of Medicine Nancy where he studied medicine and prepared an oriented biochemical mechanisms of endocrine regulation doctorate. After obtaining his MD degree and specialization in public health (epidemiology) decided to turn his career to the study of the relationship between environment and human health: microbiology of drinking water, environmental epidemiology and surveillance, maritime outbreaks, hygienic hospital and control of nosocomial infection. Since 1981 he is a member of evaluation committees and French risk advisor for international cooperation programs in health risk assessment. In 250 publications in which he has participated since 1973, has been dedicated to issues such as toxicology water, water microbiology, nosocomial infections, etc. We have not found works in the area of risks from electromagnetic fields.

Prof. Peter Hoet. Professor at Katholieke Universiteit Leuven (Belgium) in the following areas: toxicology, allergy, epidemiology, quality of air, toxicokinetics, nanotoxicology, etc. He studied industrial Master of Science in Katholieke Hogeschool Antwerpen Industriële (Belgium) and Master of bioscience engineering at the Katholieke Universiteit Leuven (Belgium), where he is currently professor. He studied biology and medicine in Leuven and toxicology in the UK. Expert in immunotoxicology clinical and epidemiological research in disorders produced by the environment. His recent work focuses on nanoparticle contamination and exposure to air polluted by traffic. We have not found works in the area of risks from electromagnetic fields.

Dr. Norbert Leitgeb. Works on the Graz University of Technology, Graz (Austria). Member of the International Advisory Committee on EMF of the World Health Organization. He has a background in Biomedical Engineering. He has works in the area of risks from electromagnetic fields.

Dr. Luis Martínez Martínez. Head of Clinical Microbiology at the Hospital of the University of Cantabria, Santander (Spain). Professor of the same subject at the University of Cantabria. We have not found works in the area of risks from electromagnetic fields.

Prof. Ana Proykova. President of the National Nanotechnology Center of the Academy of Sciences of Bulgaria. Professor of Medical Physics (radiology) at the University of Sofia (Bulgaria). Training in Physics. She teaches medical physics that relate among other subjects, to the influence of radiation on tissues. We have not found works in the area of risks from electromagnetic fields.

Dr. Luigi Rizzo. Professor at University Fisciano Salerno (Italy) of Environmental Engineering and Environmental Science and Technology. Scientific expertise in contamination of soil, water and microbiology. We have not found works in the area of risks from electromagnetic fields.

Prof. Eduardo Rodríguez-Farré. He works in the Higher Council for Scientific Research, Madrid (Spain) (environmental neurotoxicity) and is professor at several universities in the field of neurotoxicology. He has a background in medicine, pharmacology and radiology. We have not found works in the area of risks from electromagnetic fields.

Dr. Lesley Rushton. He has a background in statistics. He works in the area of Epidemiology and Statistics in Environmental and Occupational Health at Imperial College London (UK). We have not found works in the area of risks from electromagnetic fields.

Dr. Konrad Rydzynski. He has medical training. Director General and Professor of Toxicology at the Nofer Institute of Occupational Medicine, Lodz (Poland). In recent years his research focuses on the genotoxicity and carcinogenicity, with special emphasis on health hazards and risks arising from exposure to nanoparticles. We have not found works in the area of risks from electromagnetic fields.

Dr Theodoros Samaras. Professor of Physics (exposure to EMF), Engineering (Biomedical) and the Environment at the Aristotle University of Thessaloniki (Greece). Have training in medical physics. He has many works in the area of risks from electromagnetic fields. He is chairman of the working group of EMF of the Scientific Committee on Emerging and Newly Identified Health Risks from 2013. In his Declaration of interest appears as Consultant and Advisor to the Greek Vodafone Group (Vodafone-Pasnafon) on various projects.

Dr Emanuela Testai. Vice-president of the Commission. Head of the Toxicology Unit of the Department of Environment and Primary Prevention Mechanisms. She works at the Istituto Superiore di Sanità, Rome (Italy). Training in Biology and Biochemistry. Her current research at the Institute cited on Toxicology and Risk assessment for human health. Her work focuses on mammalian toxicology with emphasis on exposure to certain natural or synthetic products. We have not found works in the area of risks from electromagnetic fields.

Dr. Theodorus Vermeire. Head of Occupational Health and Transportation National Institute of Public Health and Environment (RIVM) in the Netherlands. He has a background in biochemistry and toxicology. He has developed a system for the assessment of industrial chemicals, pesticides and biocides. We have not found works in the area of risks from electromagnetic fields.

ANNEX II

EMF WORKING GROUP OF THE SCIENTIFIC COMMITTEE OF NEWLY EMERGING HEALTH RISKS IDENTIFIED

- EXPERTS SCENIHR

Prof. Dr. Theodoros Samaras. Professor of Physics (exposure to EMF), Engineering (Biomedical) and the Environment at the Aristotle University of Thessaloniki (Greece). Have training in medical physics. He has many works in the area of risks from electromagnetic fields. He is president of the EMF working group of the Scientific Committee on Emerging and Newly Identified Health Risks (SCENIHR) in 2013. In his Declaration of interest appears as Consultant and Advisor to the Greek Vodafone Group (Vodafone-Pasnafon) on various projects.

- EXTERNAL EXPERTS:

Prof. Anssi Auvinen. Professor of Epidemiology in the School of Health Sciences of the University of Tampere (Finland). He was member of the Committee SCENIHR. In 2013-2014 researchs with "Mobile Manufacturers Forum," which is an international organization founded in 1998 by leading companies in manufacturing mobile phones and radio equipment, which includes companies such as Alcatel, Ericsson, Mitsubishi Electric, Motorola, Nokia, KarbonnMobiles, Panasonic, Philips, Sagem, Samsung,

Siemens, Sony Ericsson and TCL & Alcatel Mobile Phones. Also between 2009 and 2011 he conducted research on mobile phone users supported in part by Nokia, TeliaSonera and Elisa and under the Technology Agency of Finland. He has any work in the area of risks from electromagnetic fields.

Prof. Dr. Heidi Danker-Hopfe. Head of Competence Center of Sleep Medicine of the Charité University Medicine Berlin. He has any work in the area of risks from electromagnetic fields.

Dr. Kjell Hansson Mild. Scientific Advisor from Telia Sonera Group between 2010 and 2014; this group is the dominant telephone company and mobile network operator in Sweden and Finland. He is professor in the Department of Radiation Sciences, University of Umea (Sweden). He has any work in the area of risks from electromagnetic fields.

Prof. Mats-Olof Mattsson. From 2009 to the present is a member of the Advisory Scientific Committee of TeliaSonera, Stockholm (Sweden), but do not compensate him for it (although we understand that his link makes him dependent). He has any work in the area of risks from electromagnetic fields.

Dr. Hannu Norppa. Professor at the Finnish Institute of Occupational Health and the School of Biological Sciences, Helsinki (Toxicological Genetics). Not appear in his curriculum specific work in the area of risks from electromagnetic fields.

Dr. James Rubin. Professor of Psychology. He has received money as an expert in England in a case involving the installation of wifi in a church. Also for advice in the State of Jersey on possible causes of electrosensitivity. He has also received money, among others, by the industry to carry two double-blind provocation on the effects of GSM and TETRA signals in people. He works in the area of risks from electromagnetic fields.

Dr. Maria Rosaria Scarfi. Scientist at the Institute for Electromagnetic Sensing of the Environment IREA, Naples (Italy). From 2001 to 2004 she was principal investigator of a research project on the health effects of emissions from wireless phones of CTIA-The Wireless Association (International Nonprofit organization that has represented the wireless communications industry since 1984) . Between 2004 and 2005 she participated in a similar project funded by Telecom Italia Lab. Between 2006 and 2007 she participated in another research project funded by Telecom Italia Lab.

Dr. Joachim Schuz. Head of the Research Section of IARC (International Agency for Research on Cancer). Expertise in Epidemiology, Biostatistics and Medical Informatics. Between 1999 and 2004 he participated in the Interphone study, which was attended by the UICC (International Union Against Cancer), which was funded by the Mobile Manufacturers Forum and GSM Association. Between 2006 and 2012 he has conducted studies on electromagnetic waves and the risk and survival in children with leukemia funded by the Electric Power Research Institute (Research Institute of Electric Power), an organization that conducts interest research to the industry of electric power in the United States. EPRI is in principle a non-profit independent organization, but is funded by organizations of production, distribution and interest in the electricity industry.

Dr. Zenon Sienkiewicz. Physiology training. His particular research interests include the physiological and behavioral effects of power frequency and radio frequency fields; the effects of prenatal exposure to ionizing radiation or ultrasound on behavior and the effects of UV radiation on melanomagenesis. Figure in his statement the relationship with BT (one of the largest companies telecommunications services in the world) from 2003 to present. He also works as a Consultant since 2009 with the "Rapid Response Group, Japan EMF Information Center" (funded by "Japan Electrical Safety & Environment Technology Laboratories"), by reviewing and analyzing scientific studies recently published. He is a member of the International Commission On Non Ionizing Radiation Protection.

Dr. Olga Zeni. Scientist at the Institute for Electromagnetic Sensing of the Environment IREA Naples (Italy). Between 2001-2004 she participated in the project "Health effects of radio frequency emissions from wireless phones," organized by the CTIA (Cooperative Research and Development Agreement),

which is an international association for the wireless telecommunications industry, representing carrying, manufacture and supply wireless Internet. Between 2004 and 2005 she has been responsible for a science project on the effects of electromagnetic waves of mobile phones supported by Telecom Italia Lab. Between 2006 and 2007 she was chief scientist of another similar project also funded by Telecom Italia Lab.