



One step forward, two steps back

Statement of the Competence Initiative for the Protection of Humanity, the Environment and Democracy e.V.

Regarding the Opinion of the European Economic and Social Committee (EESC) at the Plenary Session on 21 January 2015

Topic: *Electromagnetic Hypersensitivity*

At the EU institutional level, there is a process in motion that perfectly reflects the usual contradictory pattern of national and international wireless communication policies—and it goes mostly unnoticed by the European public. *The Competence Initiative for the Protection of Humanity, the Environment and Democracy e.V.*—an international, interdisciplinary, and nonpartisan professional organization where scientists, physicians, legal experts, and engineers come together—takes a stand regarding this process, which, in our opinion, jeopardizes the attainment of a sustainable health and environmental policy for Europe.

Significance and paradox of the EESC Opinion

It was and is of the greatest importance that such a committee as the European Economic and Social Committee (EESC) has paid attention to electromagnetic hypersensitivity for months. As the RF radiation exposure levels due to wireless communication technologies rises, so increases the number of European citizens who suffer from EHS or electromagnetic hypersensitivity.

The Committee's Section for Transport, Energy, Infrastructure and the Information Society, which had been commissioned to do the preliminary research, developed positions and eventually released its far-sighted Draft Opinion on 7 January 2015, which was submitted to the EESC Plenary Session for a vote on 21 January 2015. Yet the Committee rejected the Opinion prepared by the expert group and instead hastily adopted a Counter Opinion—with a relatively narrow majority of 136 to 110 votes and 19 abstentions—in which it took back key insights and recommendations for future action made by the expert group. (For the dramatic course of events, we refer to the report by the Spanish *PECCEM* [EESCextra >>>](#))

The institutional work of this Committee is quite a paradox, which shows again the current dilemma of politicians who are caught between an unscrupulous pro-industry stance and a preventive health care or environmental conscience, respectively: One step forward, two steps back. And this is borne by all European citizens, not only the ever growing number of those affected by electromagnetic hypersensitivity.

Progress in the original Draft Opinion of the expert group

First, we will take a look at the original Draft Opinion ([Draft Opinion >>>](#)), which had been written by an expert group over a lengthy period of time and then submitted to the Committee. Beside numerous attempts to be progressive, the following emphases stand out right away.

Awareness of political reality

The Draft Opinion shows an awareness of political reality that considers the current international body of scientific knowledge, demonstrating commitment to Europe as a whole and the various European nations.

For one, the authors acknowledge that the exposure to artificial electromagnetic fields (EMF) has increased tremendously since the introduction and expansion of wireless communication technologies, especially with regard to the ill-considered rampant proliferation of Wi-Fi networks in our living environment, at home and at work. This expansion increasingly causes health problems, especially for EHS sufferers, and therefore urgently requires appropriate protective action. Further, the authors demand that there must be a process in place to ensure that researchers and scientific institutions that study health- and environment-related effects, and especially those involved in the setting of exposure guidelines, are independent.

Consequences and goals

From this awareness of political reality, the Draft Opinion develops the following two objectives, among others.

In the face of the complexity of electromagnetic hypersensitivity, protective measures to reduce RF radiation exposure levels are suggested and placed on the agenda. At the same time, with regard to the nonthermal biological effects of RF radiation, the implementation of the ALARA (*As Low As Reasonably Achievable*) principle and the support of further research are given top priority. The authors of the Draft Opinion use very explicit language to describe their fundamental approach:

The EESC emphasises the need to step up the application of the precautionary principle, bearing in mind the risk of non-thermal biological effects of electromagnetic emissions. In addition, it is important to facilitate research in this area, which is currently evolving as a result of advances that may have been made (DRAFT OPINION, 1.6).

For a sustainable wireless communication policy

All in all the Draft Opinion of the expert group documents an important step toward a sustainable wireless communication policy at a European level.

The expert group takes the ever increasing number of those very seriously who suffer from EHS and often not only struggle with severe health problems, but also with major challenges in their everyday personal and work lives. The expert group also takes the ongoing findings of independent medical and biophysical research teams very seriously who document the evidence of risks associated with biological effects. The expert group also takes medical organizations and treating physicians very seriously who have responded to the new disease patterns with publishing many case histories and developing preventive guidelines and treatment plans.

Finally yet importantly, the Draft Opinion is in line with progressive European and global precautionary initiatives. It is common knowledge that, in a unanimously adopted resolution from 6 May 2011, the Committee on Environment, Agriculture and Local and Regional Affairs of the Parliamentary Assembly of the Council of Europe (PACE) demanded a fundamental change in wireless communication policies, which was supported by the Standing Committee of the Council of Europe on 27 May 2011. After reviewing several hundred scientific studies in spring 2011, the International Agency for Research on Cancer (IARC) of the World Health Organization (WHO) classified radio-frequency electromagnetic radiation as *possibly*

carcinogenic. The European Environment Agency (EUA) followed with a statement in fall 2011, calling for better consumer information and protection.

Steps taken back in the Counter Opinion

When we take a closer look at the Counter Opinion, which was drawn up at the last minute and finally adopted by the Plenary Session, the fundamental differences to the original Draft Opinion ([Counter Opinion >>>](#)) of the expert group could not have been greater. The Counter Opinion is not only an expression of stagnation, but also a step back from the international debate regarding wireless communication technologies as reflected in selected aspects of the document.

Assurances of concern regarding EHS sufferers and preventive intentions

The Counter Opinion is full of concern regarding the *prevalence of EHS* and also states that *further substantial research is ongoing to understand the problem and its causes* (OPINION, 1.1).

The Committee acknowledges that *EHS sufferers experience real symptoms* and goes on to assure its constituents that the EU *has maintained an active engagement with this topic* and continues to do so with seriousness (1.6, 3.2, and other text passages).

The Committee also clearly states its intention of continuing to uphold the precautionary principle:

However, to allay continuing public concern and to uphold the precautionary principle the EESC urges the Commission to continue its work in this area particularly as further research is still needed to accumulate evidence concerning any potential health impact from long-term exposure, for example using a mobile phone for more than 20 years. At the same time, the Committee expressed its support for reducing exposure to non-ionising radiation (1.4, 3.8). Specific measures on how to protect the public, however, are no longer mentioned.

Blind research into causes

The discussion of specific research into causes—the linchpin of effective support for EHS sufferers and the basis for any appropriate precautionary policy— lacks, however, any reference to the current body of international research findings and knowledge.

In contrast, only the discussion regarding *the thermal impact on the human body of electromagnetic fields* (3.5), which would fall within the framework of international exposure guidelines, is given much space.

Nonthermal biological effects, which have been proven by international research, and causal effect mechanisms, which have been documented in numerous studies, were not mentioned at all. It is, however, part of the international knowledge base of progressive scientists that—beside other environmental exposures—they are a key cause for the increasingly prevalent electromagnetic hypersensitivity and associated new disease patterns.

Trust in SCENIHR?

By dismissing the existing body of evidence, the authors of the EESC Counter Opinion instead refer to a shortly to be released Opinion by the European Scientific Committee on Emerging and Newly Identified Health Risks (SCENIHR). The SCENIHR committee, however, has already been criticized in the past for its number of pro-industry members, who are expected, with regard to radiation protection, to uphold at all costs the status quo that is harmful to health and the environment ([EM-Radiation Research Trust 31. Aug 2014 >>>](#)).

On 18 August 2014, the *Competence Initiative e.V.* had already filed such a *Complaint about SCENIHR regarding the Preliminary Opinion on Potential Health Effects of Exposure to Electromagnetic Fields (EMF)* with the European Ombudsman Mrs. Emily O'Reilly, whose result is still pending.

The EESC Counter Opinion clearly states how the basic statements of the shortly to be released SCENIHR Opinion will turn out—which comes as no surprise to insiders: *The EESC understands that the main conclusions of this report will not differ substantially from the preliminary opinion of 2013 which stated "Overall, there is evidence that exposure to radio-frequency fields does not cause symptoms ..."* (1.2)

Conclusions and recommendations

We firmly object to the EESC Opinion from 21 January 2015, which, after a surprising intervention, dismissed the original Draft Opinion of the expert group and replaced it with a Counter Opinion. In our opinion, the Counter Opinion shows signs of consolidating the paradox state of affairs regarding wireless communication policies that protects the industry instead of the public. This paradox state of affairs is based on a lack of a sense of reality or a denial of reality.

We summarize our findings as follows:

(1) The original Draft Opinion, which was drawn up by an expert group, is consistent with an important step toward a European precautionary policy for radiation protection that is compatible with human health and the environment.

(2) The Counter Opinion is a step backward on several levels:

(a) It does not take into account the rising number of EHS sufferers nor the urgently needed measures to protect the public from RF radiation—least of all the vulnerability of children and adolescents.

(b) It uses completely outdated scientific criteria and methods to assess research into causes, thereby ignoring the existing body of research evidence regarding well-documented risks as well as proven effect mechanisms.

(c) It transfers responsibilities of the EESC to the scientific SCENIHR committee whose pro-industry attitude is mainly responsible for the current wireless communication politics and its contradictions.

(d) In all of these points, however, it is also in conflict with the human right of health, which has been explicitly included in Article 25 of the Universal Declaration of Human Rights at the General Assembly of the United Nations on 10 December 1948.

We hereby appeal to the Committee, especially to those members who voted for the Counter Opinion or abstained from voting:

(1) Do not ignore the voices of countless EHS sufferers and the organizations representing them.

(2) Allow yourself to consider the body of evidence of independent researchers as has been documented, for example, by the BioInitiative Working Group in two substantial research reports.

Additional information [BioInitiative 2012 >>>](#)

(3) Our Initiative makes the international body of scientific evidence accessible through special research reports.

[Brochures >>>](#)

[Research reports >>>](#)

Inform yourself about the first public conference on long-term risks of the Competence Initiative at Würzburg on 5 April 2014 to appreciate, against this background, the future responsibility associated with the European commitment to protecting human health.

[Conference proceedings >>>](#)

Europe owes its existence to the history of inalienable citizen and human rights. And as citizens with inalienable rights, let us together ensure that Europe will not fall victim to the damaging interests of the industry and will not lose its credibility.

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*The Board of the
Competence Initiative for the Protection of Humanity, the Environment and Democracy e.V.*