



7 March 2014

Mr. Ladislav Miko  
Mr. Robert Vanhoorde  
Mr. Michael Walsh  
SANCO.DDG2.03 - Relations with Agencies and Advisory Groups  
Via email

Re: ***Preliminary Opinion on Potential Health Effects of Exposure to Electromagnetic Fields (EMF)***

Gentlemen,

The BioInitiative Working Group is in the process of reviewing the *Preliminary Opinion on Potential Health Effects of Exposure to Electromagnetic Fields (EMF)*.

The public consultation period requires submittals by April 16, 2014. As we read it, the instructions from SCENIHR designate a format that limits comment to 2500 characters (or by our estimate, about 500 words). No email or postal mail comments may be submitted separately.

This letter requests SCENIHR to allow more detailed comments on the 211 page draft report. We respectfully request that our full comment be accepted and reviewed as part of the public consultation process. Otherwise, meaningful scientific and public health expert comment would be excluded. It basically defeats the purpose of soliciting public consultation if comments are limited to 2500 characters of analysis, conclusions and suggested revisions.

Further, the SCENIHR hearing in Athens at the end of March also limits testimony to two minutes per participant. This process further limits valuable comments and dissuade experts from participating in the public consultation process. Valuable input to the SCENIHR document will be lost as a result.

Thank you for your consideration.

Respectfully submitted on behalf of the BioInitiative Working Group by:

Cindy Sage, MA and David O. Carpenter, MD  
Co-Editors, BioInitiative 2012 Report

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