



December 19, 2016

International EMF Project
World Health Organization
Avenue Appia 20 - 1211
Geneva 27, Switzerland

Attention: Dr. E. van Deventer
Subject: WHO RF EHC Core Group Membership is Unacceptable

The BioInitiative Working Group urges the World Health Organization to make changes to the WHO RF EHC Core Group membership to more fairly reflect membership and expertise of the 2011 IARC RF Working Group. At present the WHO RF EHC Core Group is indistinguishable from ICNIRP (1, 2) undermining credibility of the process and ensuring doubt about conclusions. Even if schedule delays occur as a result, an acceptable outcome depends on public confidence.

If the WHO is to minimally meet its stated objectives to develop a solid base of scientific evidence and help countries effectively identify and manage RF health risks, then it is important that the most knowledgeable panel of experts be appointed to prepare the RF EHC Monograph. At present, the EHC Core Group members uniformly represent attitudes and scientific positions of ICNIRP, an organization whose membership has steadfastly refused to accept new scientific evidence of potential health risks from non-thermal, low-intensity radiofrequency radiation despite recent scientific advances in knowledge on the subject. (1)

There now many thousands of high quality scientific papers indicating possible non-thermal RF risks to health and those experts most competent by virtue of their research contributions are absent from this process. WHO Interphone studies on humans (2010-2016) have found increased risk of malignant brain cancer in adults with ten years and greater exposure to cell phone radiation (ipsilateral use). Newly released animal studies conducted over a 16-year period by the NIEHS National Toxicology Program now report clear carcinogenic effects of chronic exposure to RF. In June of 2016, the NTP documented statistically significant risks for cancers of the brain and heart, as well as pre-cancerous lesions in animals exposed to RF, but not in control animals. Both human and animal results are now available to incorporate in the RF EHC risk assessment. This important effort can only be assured with a more balanced composition of core participants in the process. As well, the membership needs to be inclusive of under-represented countries such as Russia, China, India, Turkey, and Iran whose research communities have produced the majority of studies on non-thermal effects of RF in recent years.

Respectfully submitted on behalf of the BioInitiative Working Group by:

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(1) Adapted from Starkey S. 2016. Inaccurate official assessment of radiofrequency safety by the Advisory Group on Non-ionising Radiation. *Rev Environ Health* 2016; 31(4): 493–503, Table 2. Open Access.

Table 2: Named contributors to the WHO Environmental Health Criteria Monograph on Radiofrequency Fields [in preparation] and membership of the International Commission on Non-Ionizing Radiation Protection (ICNIRP) or Advisory Group on Non-Ionizing Radiation (AGNIR)

RF Environmental Health Criteria (EHC) Core group

Feychting M.	Vice-Chair ICNIRP, AGNIR (epidemiological studies)
Mann S.M.	ICNIRP, AGNIR (physics, dosimetry)
Oftedal G.	ICNIRP (human studies)
van Rongen E. Chair	ICNIRP (animal studies)
Scarfi M.R.	ICNIRP (former member) (in-vitro studies)
Zmirou D.	(public health)

Additional experts

Aicardi G.	
Challis L. Formerly	AGNIR
Curcio G.	
Hug K.	
Juutilainen J.	ICNIRP
Lagorio S.	
Loughran S.	ICNIRP
Marino C.	ICNIRP
McNamee J.	
Naarala J.	
Peyman A.	AGNIR
Roosli M.	ICNIRP
Rubin G.J.	AGNIR
Schoemaker M.	
Selmaoui B.	
de Seze R.	ICNIRP
Sienkiewicz Z.J.	ICNIRP, AGNIR
Simko M.	
Vijaylaxmi	
Zeni O.	

cc: Dr. Maria Neira, Director, Public Health and Environment, WHO
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