

January 17, 2018



To
Dr Vytenis Andriukaitis, EU Commissioner of Health
cc: EU Commission for Health and Food Safety,
European Centre for Disease Prevention and Control,
European Council and EU President Donald Tusk.
cc: Council of Europe

Dear EU Commissioner, cc: President Tusk, EC and ECDC

Following the letter and the Scientist Appeal calling for a moratorium on 5G (“[The 5G Appeal](#)”), which we sent to your office, we received a response from Director John F. Ryan on October 13, 2017 ([Ares \(2017\) 5015409](#) - Reply, Attachment 1) and then, upon our reply (Attachment 2), a letter from Mr. Arūnas Vinciūnas (dated 29.11.2017, see Attachment 3).

Despite the conclusive evidence presented in our letters, both Director Ryan and Mr. Vinciūnas gave generic responses and continued to claim that EMF “*does not represent a health risk*”. In doing so they only refer to ICNIRP and SCENIHR opinions without explaining why they disregarded the compelling evidence and references under the 5G-Appeal headline: “Harmful effects of RF-EMF exposure are already proven”. In addition, neither Mr. Ryan nor Mr. Vinciūnas seem to note that the 5G-Appeal was signed and **confirmed by more than 180 industry-independent scientists and medical doctors**, today more than 200. (NOTE: [Blue underlined](#) texts are links to references.)

Considering that you are the EU Commissioner of Health, and considering the importance of the 5G Appeal we cordially ask to receive your personal response to the serious issues that are raised in the Appeal and in this letter. We attach Director Ryan’s letter and our cover letter (Attachment 4) which contains links to the 5G Appeal in 7 languages, and to the list of the 200+ signatories.

In regard to the SCENIHR report, scientific criticism of the content and conclusions was made by Sage *et al* (2015) in a peer-reviewed article sent on February 1, 2016, on behalf of the BioInitiative scientists group and ECERI as a [Comment to Director Ryan](#). They stated that the evidence presented in SCENIHR actually conflicts with the position stated in its conclusion.: “*The evidence in the SCENIHR Final Opinion on EMF [clearly and convincingly establishes the potential for health effects](#) of exposure to electromagnetic fields [EMF]. Based on the evidence provided in this Opinion, the Committee is obligated to draw to the attention of the Commission that [EMF is a new and emerging problem that may pose an actual or potential threat](#).” Finally, as a “community scientific committee”, the SCENIHR report has a statutorily limited validity ([Directive 2001/95/EC](#) Article 13(2) “not exceeding one year”.*

The ICNIRP exposure limits are dependent on an unproven hypothesis that “only heat from EMF can cause any health hazards”. This hypothesis has clearly been rejected in a large number of bgscientific studies. Since the “heating-only-hypothesis” has been rejected, **there is no scientific basis for the guidelines**. Thus, the guidelines must be rejected and **new biologically-based guidelines must immediately be formulated** by competent scientists and physicians independent from industry.

Both EU officials defend the industry-supportive standpoint that EMFs are harmless if below the ICNIRP “guidelines”. However, many of the scientists on both ICNIRP’s and SCENIHR’s committees are [connected to the telecom industry with obvious conflicts of interest](#). To consult only these two committees about the adequacy of EMF safety limits is alarming considering earlier experience with the safety of tobacco and asbestos. In fact, insurance companies’ business is assessing risk. Swiss Re, one of the biggest secondary insurance companies in the world, [classified the "unforeseen consequences of electromagnetic fields" in the highest risk category](#).

It is of great concern that ICNIRP, SCENIHR, Director Ryan and Mr. Vinciūnas ignore all the mentioned facts, and also IARC evaluations finding both ELF-EMF and RF-EMF to be ‘possible’ human carcinogens, Group 2B. Obviously scientific evaluations made by IARC expert groups must be considered, not only those by ICNIRP and SCENIHR. Clearly if EMFs have been classified as 2B carcinogens, it cannot be claimed that EMFs do not impose any health risks. Other qualified international organisations mentioned in the 5G-Appeal also prove that existing EMF safety limits are inadequate, and the addition of 5G is a **great risk for EU health!**

You should regard the Appeal for a Moratorium on 5G, our previous correspondence, and our current letter, in conjunction with the scientific proofs in Attachment 5, to trigger the statutory requirement to re-assess and dramatically lower the EMF safety limits to protect public health as required by Article 3(1)(a) of [Directive 2014/53/EU](#), as well as protections provided in the [Radio Spectrum Policy Programme](#) and Council [Recommendation 1999/519/EC](#).

Many of the most important objectives of the [Radio Spectrum Policy Programme](#) and The [Digital Agenda](#) can be met using wired infrastructure. Thus, the health hazard posed by exposure to radiation from wireless technology need not be viewed as interfering with technological objectives, merely **refocusing them toward wired technologies**.

The [Radio Spectrum Policy Programme \(243/2012/EU\)](#) recognizes the need to protect public health in Point (31) “*the Union should take full account of the protection of public health against electromagnetic fields.... it is essential to ensure constant monitoring of the ionising and non-ionising effects of spectrum use on health, including the real-life cumulative effects of spectrum use in various frequencies by an increasing number of equipment types.*” This point additionally codifies Council [Recommendation 1999/51/EC](#).

Council [Recommendation 1999/519/EC](#), which sets certain radio-frequency radiation exposure limits, also stipulates the necessity for updating those limits as scientific data and advice change “*the frame-work should be regularly reviewed and reassessed in the light of new knowledge and developments in technology and applications of sources and practices giving rise to exposure to electromagnetic fields*” (Point 10). Point (19) of 1999/519/EC allows for “*guidance issued by competent international organisations*”. ICNIRP is listed only as an example, **not specified as the competent international organisation**. In the 5G-Appeal we mention several competent groups.

Mr Vinciūnas stated in his letter: “*The recourse to the EU's Precautionary Principle to stop the distribution of 5G products appears **too drastic a measure**.*” Mr Vinciūnas finishes his letter: “*we need to see ... how the scientific **evidence will evolve***”.

According to [Communication from the Commission on the precautionary principle](#): “*Whether or not to invoke the Precautionary Principle is a decision exercised where scientific information is insufficient, inconclusive, or uncertain and where there are indications that the possible effects on the environment, or human, animal or plant health may be potentially dangerous and inconsistent with*

the chosen level of protection.” That describes the situation with 5G perfectly. Existing data shows that 5G frequencies are hazardous. However, additional studies will be necessary to fully determine the extent of the risk. Therefore, the Precautionary Principle **requires** that experiments be done on plants and animals, as well as cellular and biochemical studies **before** we expose humans. The Precautionary Principle was established in the EU because lives, health and the environment are important. Therefore it is absolutely not, as Mr. Vinciūnas said “*too drastic a measure to apply the Precautionary Principle*”, because **well documented harm has already been caused** by EMF radiation (see 5G-Appeal and Attachment 5, p. 8). Indeed, case law supports the need to take precautionary action to protect public health when serious risks exist (See 5.1 and ANNEX I, Ref 5 in [Communication from the Commission on the precautionary principle](#)).

If the EU really is, as Vinciūnas puts it, “*safeguarding the health of the European citizens at the highest level possible*” then you **must have evidence before you start** exposing every European citizen with 5G frequencies in this biological trial forced on humans. (Attachment 5, p. 9-10)

Please note that the 5G-Appeal asks EU for both 1) a moratorium to give time for research on the health consequences of 5G frequencies, **before they are widely applied**, and 2) a “*task force of independent, truly impartial EMF-and-health scientists with no conflicts of interest*” to “*decide about new, safe ‘maximum total [cumulative] exposure standards’ for all wireless communication within EU*”. These should be adequately protective and rely on biologically-based current independent science.

Please be aware that we will make your response publicly available just as our 5G Appeal and the responses so far from EU. We urge you to read the 5G Appeal and give it thorough consideration! Please notice an email to you from Professor emeritus Martin Pall with the “Subject”: “5G: Great risk for EU health!”, an excellent summary of research showing harmful effects of non-thermal EMF – already before 5G was added.

We look forward to receive your personal response no later than by February 17, 2018.

Respectfully submitted

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Attachments:

- 1) Answer from Director John Ryan
- 2) Our reply to Director Ryan’s letter
- 3) Answer (to our reply in pt 2) from Mr. Arūnas Vinciūnas, Head of cabinet
- 4) Cover Letter for 5 G-appeal (with links to the 5G-appeal)
- 5) Separate email “5G: Great risk for EU health!” sent to you 17.1.2018 by Prof. em. Martin L. Pall.