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Dear Dr Cooper

Health Effects from Radiofrequency Electromagnetic Fields

We note publication of the AGNIR Report "Health Effects from Radiofrequency Electromagnetic Fields - RCE 20" dated April 2012 and the HPA Statement dated 25 April 2012 in response. We set out here our criticisms of the HPA Statement and ask the HPA to revise its response to the AGNIR Report in the light of these.

We believe the HPA's response as set out in the HPA Statement is inadequate in the following respects:

Failure to consider all relevant evidence.

1. The HPA Statement, by describing the AGNIR Report as comprehensive fails to recognise that the report reflects an incomplete body of evidence, or to assess the implications of this shortcoming. The AGNIR Report, by its own admission, is out of date (with a cut-off date for papers considered of December 2010, a full 16 months prior to publication). Additionally, numerous relevant studies published before that cut-off date were omitted from the references, while a few studies from 2011 have been included, suggesting a selective application of the cut-off.
2. The HPA Statement fails to discuss the findings of relevant scientific authorities other than AGNIR, especially the International Agency for Research on Cancer (IARC) Monograph classification of radio-frequency electromagnetic fields as possibly carcinogenic under IARC Class 2B. The World Health Organization's Preamble to the IARC Monographs states that "the Monographs are used by national and international authorities to make risk assessments, formulate decisions concerning preventative measures, provide effective cancer control programmes and decide among alternative options for public health decisions." They are widely regarded as the "gold standard" in cancer risk assessment. Therefore, the failure of the AGNIR Report and the HPA Statement to explicitly consider the IARC monograph assessment of radio-frequency electromagnetic fields and to explain the reasons for disagreeing with it are major omissions.

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Absence of risk assessment - failure to consider implications of evidential uncertainty

3. The HPA Statement fails to acknowledge that the conclusions contained in the Executive Summary of the AGNIR Report do not flow from the content of the report, or to assess the implications of this. In particular, there is no substantiation of the “no convincing evidence” verdict in the AGNIR Report, and this conclusion is contradicted by the other sections of the Report, which contain references to many studies which have found harmful effects. The term “convincing” is a subjective term that has no place in risk assessment, especially if not explained by reference to specific assessment criteria.
4. The HPA Statement recognises that some studies have identified adverse effects, and that the possibility of harm remains, but fails to consider the implications of this evidence. It fails to draw out the implications of the confused scientific picture contained in the AGNIR Report or to offer any recommendations to address the possible harm.
5. The HPA Statement fails to acknowledge that the Executive Summary of the AGNIR Report ignores the areas of controversy and disagreement within the scientific community. AGNIR presents its findings as uncontroversial, despite the issues being hotly debated amongst scientists, and the HPA has not considered the policy implications of alternative views of the science.

Failure to consider and assess policy options

6. The HPA Statement fails to consider and assess all relevant policy options. In particular, it does not consider the range of guidance that it could provide (in the light of the uncertainty over safety acknowledged in both the AGNIR Report and the HPA Statement) and the various means available to it to communicate such guidance. The response offers only one policy option, namely to continue with the existing approach, despite the evidential landscape having changed significantly since that policy was arrived at in 2000.
7. The HPA Statement recognises that a precautionary approach is appropriate, then fails to recommend any precautionary measures. Continuing with the existing policy is not, in practice, precautionary because steps are not being taken to communicate current guidance to the public.
8. The HPA statement fails to acknowledge the implications of duties imposed by Council of Europe resolution 1815 (2011) and European Parliament resolution 2008/2211(INI) of 2 April 2009 to take action to reduce exposures to electromagnetic fields, for example to reduce exposures to children in schools. No explanation is provided for the failure to recommend policy measures to give effect to these resolutions.

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In the light of these concerns, we urge the HPA to revise its response to the AGNIR Report. In particular, the HPA should:

- acknowledge the limitations of the AGNIR report as outlined above;
- consider and evaluate policy options reflecting the acknowledged uncertainties over safety and the above-mentioned IARC monograph assessment, Council of Europe resolution and European Parliament resolution, in order to arrive at a genuinely precautionary policy in accordance with the stated intention; and
- consider whether institutions who follow contemporaneous HPA advice which contradicts the above-mentioned IARC monograph assessment, Council of Europe resolution and European Parliament resolution could be exposed to litigation.

Yours faithfully,

MobileWise

Note: in this letter, references are as follows:

1. "AGNIR Report": is the report entitled "Health Effects from Radiofrequency Electromagnetic Fields - RCE 20", dated April 2012.
<http://www.hpa.org.uk/Publications/Radiation/DocumentsOfTheHPA/RCE20HealthEffectsfromRFElectromagneticFields/>
2. "HPA Statement" is the statement referred to on the HPA website as "HPA Response to the 2012 AGNIR Report on the Health Effects from Radiofrequency Electromagnetic Fields" dated 25 April 2012:
http://www.hpa.org.uk/Publications/Radiation/HPAResponseStatementsOnRadiationTopics/radresp_AGNIR2012/

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