

New Hampshire Site Evaluation Committee  
21 South Fruit Street  
Suite 10  
Concord, MA 03305

Merrimack Valley Reliability Project  
SEC Docket # 2015-05

**MOTION TO REOPEN RECORD**

On this 17th day of February, 2017, I Margaret Huard request that the records for docket 2015-05 be reopened pursuant to NH SEC Site Rule 202.27 and the attached relevant, material and non duplicative evidence be considered.

On December 7, 2016 the owner's at 19 David Drive, Hudson, NH received a report from National Grid regarding magnetic field readings done on their property. 19 David Drive is an abutter to the right of way proposed for the construction of the MVRP. Portions of the property are in the fields. While the property is on the opposite side of the right of way that the MVRP is being constructed in, it is indicative of the levels of fields in the living area abutting the right of way.

Since the fields are greatest the furthest away from the conductor you are, the readings under the conductors in this right of way would be presumed to be even higher.

Additionally, according to the BioInitiative Report 2012 (bioinitiative.org), a collective report written by 29 independent scientists and health experts from 10 countries, indicate the following.

- The safety limits around the world are some 1,000 to 10,000 time higher than what the BioInitiative Report recommends.
- The BioInitiative Report recommends an upper limit of just 1 mG for habitable space.
- Once exposed to magnetic fields, the cells in our body become highly sensitive. Afterwards exposure of just 0.1 mG creates bio effects.
- While you can not see, taste or smell Electromagnetic Radiation, it is one of the most persuasive exposures in industrialized countries today.

*Margaret Huard*  
Margaret Huard  
Intervener

**Certificate of Service**

I hereby certify that on the 17<sup>th</sup> day of February, 2017, electronic copies have been served upon the SEC Distribution List.

*Margaret Huard*  
Margaret Huard  
Intervener



## **SECTION 1**

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# **Summary for the Public**

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Prepared for the BioInitiative Working Group  
August 2007

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## **I. SUMMARY FOR THE PUBLIC**

### **A. Introduction**

You cannot see it, taste it or smell it, but it is one of the most pervasive environmental exposures in industrialized countries today. Electromagnetic radiation (EMR) or electromagnetic fields (EMFs) are the terms that broadly describe exposures created by the vast array of wired and wireless technologies that have altered the landscape of our lives in countless beneficial ways. However, these technologies were designed to maximize energy efficiency and convenience; not with biological effects on people in mind. Based on new studies, there is growing evidence among scientists and the public about possible health risks associated with these technologies.

Human beings are bioelectrical systems. Our hearts and brains are regulated by internal bioelectrical signals. Environmental exposures to artificial EMFs can interact with fundamental biological processes in the human body. In some cases, this can cause discomfort and disease. Since World War II, the background level of EMF from electrical sources has risen exponentially, most recently by the soaring popularity of wireless technologies such as cell phones (two billion and counting in 2006), cordless phones, WI-FI and WI-MAX networks. Several decades of international scientific research confirm that EMFs are biologically active in animals and in humans, which could have major public health consequences.

In today's world, everyone is exposed to two types of EMFs: (1) extremely low frequency electromagnetic fields (ELF) from electrical and electronic appliances and power lines and (2) radiofrequency radiation (RF) from wireless devices such as cell phones and cordless phones, cellular antennas and towers, and broadcast transmission towers. In this report we will use the term EMFs when referring to all electromagnetic fields in general; and the terms ELF and RF when referring to the specific type of exposure. They are both types of non-ionizing radiation, which means that they do not have sufficient energy to break off electrons from their orbits around atoms and ionize (charge) the atoms, as do x-rays, CT scans, and other forms of ionizing radiation. A glossary and definitions are provided in Section 18 to assist you. Some handy definitions you will probably need when reading about ELF and RF in this summary section (the language for measuring it) are shown with the references for this section.

## **B. Purpose of the Report**

**This report has been written by 14 (fourteen) scientists, public health and public policy experts to document the scientific evidence on electromagnetic fields. Another dozen outside reviewers have looked at and refined the Report.**

**The purpose of this report is to assess scientific evidence on health impacts from electromagnetic radiation below current public exposure limits and evaluate what changes in these limits are warranted now to reduce possible public health risks in the future.**

**Not everything is known yet about this subject; but what is clear is that the existing public safety standards limiting these radiation levels in nearly every country of the world look to be thousands of times too lenient. Changes are needed.**

**New approaches are needed to educate decision-makers and the public about sources of exposure and to find alternatives that do not pose the same level of possible health risks, while there is still time to make changes.**

A working group composed of scientists, researchers and public health policy professionals (The BioInitiative Working Group) has joined together to document the information that must be considered in the international debate about the adequacy (or inadequacy) of existing public exposure standards.

This Report is the product of an international research and public policy initiative to give an overview of what is known of biological effects that occur at low-intensity EMFs exposures (for both radiofrequency radiation RF and power-frequency ELF, and various forms of combined exposures that are now known to be bioactive). The Report examines the research and current standards and finds that these standards are far from adequate to protect public health.

Recognizing that other bodies in the United States, United Kingdom, Australia, many European Union and eastern European countries as well as the World Health Organization are actively debating this topic, the BioInitiative Working Group has conducted a independent science and public health policy review process. The report presents solid science on this issue, and makes recommendations to decision-makers and the public. Conclusions of the individual authors, and overall conclusions are given in Table 2-1 (BioInitiative Overall Summary Chart).

Eleven (11) chapters that document key scientific studies and reviews identifying low-intensity effects of electromagnetic fields have been written by members of the BioInitiative Working Group. Section 16 and 17 have been prepared by public health and policy experts. These sections discusses the standard of evidence which should be applied in public health planning, how the scientific information should be evaluated in the context of prudent public health policy, and identifies the basis for taking precautionary and preventative actions that are proportionate to the knowledge at hand. They also evaluate the evidence for ELF that leads to a recommendation for new public safety limits (not precautionary or preventative actions, as need is demonstrated).



Other scientific review bodies and agencies have reached different conclusions than we have by adopting standards of evidence so unreasonably high as to exclude any conclusions likely to lead to new public safety limits. Some groups are actually recommending a relaxation of the existing (and inadequate) standards. Why is this happening? One reason is that exposure limits for ELF and RF are developed by bodies of scientists and engineers that belong to professional societies who have traditionally developed recommendations; and then government agencies have adopted those recommendations. The standard-setting processes have little, if any, input from other stakeholders outside professional engineering and closely-related commercial interests. Often, the industry view of allowable risk and proof of harm is most influential, rather than what public health experts would determine is acceptable.

#### Main Reasons for Disagreement among Experts

- 1) Scientists and public health policy experts use very different definitions of the standard of evidence used to judge the science, so they come to different conclusions about what to do. Scientists do have a role, but it is not exclusive and other opinions matter.
- 2) We are all talking about essentially the same scientific studies, but use a different way of measuring when “enough is enough” or “proof exists”.
- 3) Some experts keep saying that all studies have to be consistent (turn out the same way every time) before they are comfortable saying an effect exists.
- 4) Some experts think that it is enough to look only at short-term, acute effects.
- 5) Other experts say that it is imperative we have studies over longer time (showing the effects of chronic exposures) since that is what kind of world we live in.
- 6) Some experts say that everyone, including the very young, the elderly, pregnant women, and people with illnesses have to be considered – others say only the average person (or in the case of RF, a six-foot tall man) matter.
- 7) There is no unexposed population, making it harder to see increased risk of diseases.
- 8) The lack of consensus about a single biological mechanism of action.
- 9) The strength of human epidemiological studies reporting risks from ELF and RF exposures, but animal studies don’t show a strong toxic effect.
- 10) Vested interests have a substantial influence on the health debate.

#### Public Policy Decisions

Safety limits for public exposure to EMFs need to be developed on the basis of interaction among not only scientists, but also public health experts, public policy makers and the general public.

*“In principle, the assessment of the evidence should combine with judgment based on other societal values, for example, costs and benefits, acceptability of risks, cultural preferences, etc. and result in sound and effective decision-making. Decisions on these matters are eventually taken as a function of the views, values and interests of the stakeholders participating in the process, whose opinions are then weighed depending on several factors. Scientific evidence perhaps carries, or should carry, relatively heavy weight, but grants no exclusive status; decisions will be evidence-based but will also be based on other factors.” (1)*

<p><b>The clear consensus of the BioInitiative Working Group members is that the existing public safety limits are inadequate for both ELF and RF.</b></p>
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**These proposals reflect the evidence that a positive assertion of safety with respect to chronic exposure to low-intensity levels of ELF and RF cannot be made. As with many other standards for environmental exposures, these proposed limits may not be totally protective, but more stringent standards are not realistic at the present time. Even a small increased risk for cancer and neurodegenerative diseases translates into an enormous public health consequence. Regulatory action for ELF and preventative actions for RF are warranted at this time to reduce exposures and inform the public of the potential for increased risk; at what levels of chronic exposure these risks may be present; and what measures may be taken to reduce risks.**

### **C. Problems with Existing Public Health Standards (Safety Limits)**

Today's public exposure limits for telecommunications are based on the presumption that heating of tissue (for RF) or induced electric currents in the body (for ELF) are the only concerns when living organisms are exposed to RF. These exposures can create tissue heating that is well known to be harmful in even very short-term doses. As such, thermal limits do serve a purpose. For example, for people whose occupations require them to work around radar facilities or RF heat-sealers, or for people who install and service wireless antenna tower, thermally-based limits are necessary to prevent damage from heating (or, in the case of power-frequency ELF from induced current flow in tissues). In the past, scientists and engineers developed exposure standards for electromagnetic radiation based what we now believe are faulty assumptions that the right way to measure how much non-ionizing energy humans can tolerate (how much exposure) without harm is to measure only the heating of tissue (RF) or induced currents in the body (ELF).

In the last few decades, it has been established beyond any reasonable doubt that bioeffects and some adverse health effects occur at far lower levels of RF and ELF exposure where no heating (or induced currents) occurs at all; some effects are shown to occur at several hundred thousand times below the existing public safety limits where heating is an impossibility.

**It appears it is the INFORMATION conveyed by electromagnetic radiation (rather than heat) that causes biological changes - some of these biological changes may lead to loss of wellbeing, disease and even death.**

Effects occur at non-thermal or low-intensity exposure levels thousands of times below the levels that federal agencies say should keep the public safe. For many new devices operating with wireless technologies, the devices are exempt from any regulatory standards. The existing standards have been proven to be inadequate to control against harm from low-intensity, chronic exposures, based on any reasonable, independent assessment of the scientific literature. It means that an entirely new basis (a biological basis) for new exposure standards is needed. New standards need to take into account what we have learned about the effects of ELF and RF (all non-ionizing electromagnetic radiation and to design new limits based on biologically-



demonstrated effects that are important to proper biological function in living organisms. It is vital to do so because the explosion of new sources has created unprecedented levels of artificial electromagnetic fields that now cover all but remote areas of the habitable space on earth. Mid-course corrections are needed in the way we accept, test and deploy new technologies that expose us to ELF and RF in order to avert public health problems of a global nature.

Recent opinions by experts have documented deficiencies in current exposure standards. There is widespread discussion that thermal limits are outdated, and that biologically-based exposure standards are needed. Section 4 describes concerns expressed by WHO, 2007 in its ELF Health Criteria Monograph; the SCENIHR Report, 2006 prepared for the European Commission; the UK SAGE Report, 2007; the Health Protection Agency, United Kingdom in 2005; the NATO Advanced Research Workshop in 2005; the US Radiofrequency Interagency Working Group in 1999; the US Food and Drug Administration in 2000 and 2007; the World Health Organization in 2002; the International Agency for Cancer Research (IARC, 2001), the United Kingdom Parliament Independent Expert Group Report on Mobile Phones – Stewart Report, 2000) and others.

A pioneer researcher, the late Dr. Ross Adey, in his last publication in Bioelectromagnetic Medicine (P. Roche and M. Markov, eds. 2004) concluded:

*“There are major unanswered questions about possible health risks that may arise from exposures to various man-made electromagnetic fields where these human exposures are intermittent, recurrent, and may extend over a significant portion of the lifetime of the individual.”*

*“Epidemiological studies have evaluated ELF and radiofrequency fields as possible risk factors for human health, with historical evidence relating rising risks of such factors as progressive rural electrification, and more recently, to methods of electrical power distribution and utilization in commercial buildings. Appropriate models describing these bioeffects are based in non-equilibrium thermodynamics, with nonlinear electrodynamics as an integral feature. Heating models, based in equilibrium thermodynamics, fail to explain an impressive new frontier of much greater significance. .... Though incompletely understood, tissue free radical interactions with magnetic fields may extend to zero field levels.” (2)*

**There may be no lower limit at which exposures do not affect us. Until we know if there is a lower limit below which bioeffects and adverse health impacts do not occur, it is unwise from a public health perspective to continue “business-as-usual” deploying new technologies that increase ELF and RF exposures, particularly involuntary exposures.**

## II. SUMMARY OF THE SCIENCE

### A. Evidence for Cancer

#### 1. *Childhood Leukemia*

The evidence that power lines and other sources of ELF are consistently associated with higher rates of childhood leukemia has resulted in the International Agency for Cancer Research (an arm of the World Health Organization) to classify ELF as a Possible Human Carcinogen (in the Group 2B carcinogen list). Leukemia is the most common type of cancer in children.

**There is little doubt that exposure to ELF causes childhood leukemia.**

The exposure levels for increased risk are quite low – just above background or ambient levels and much lower than current exposure limits. The existing ICNIRP limit is 1000 mG (904 mG in the US) for ELF. Increased risk for childhood leukemia starts at levels almost one thousand times below the safety standard. Leukemia risks for young boys are reported in one study to double at only 1.4 mG and above (7). Most other studies combine older children with younger children (0 to 16 years) so that risk levels do not reach statistical significance until exposure levels reach 2 mG or 3 mG. Although some reviews have combined studies of childhood leukemia in ways that indicate the risk level starts at 4 mG and above; this does not reflect many of the studies reporting elevated risks at the lower exposure levels of 2 mG and 3 mG.

#### 2. *Other Childhood Cancers*

Other childhood cancers have been studied, including brain tumors, but not enough work has been done to know if there are risks, how high these risks might be or what exposure levels might be associated with increased risks. The lack of certainty about other childhood cancers should not be taken to signal the “all clear”; rather it is a lack of study.

The World Health Organization ELF Health Criteria Monograph No 322 (2007) says that other childhood cancers “cannot be ruled out”. (8)

**There is some evidence that other childhood cancers may be related to ELF exposure but not enough studies have been done.**

Several recent studies provide even stronger evidence that ELF is a risk factor for childhood leukemia and cancers later in life. In the first study (9), children who were recovering in high-ELF environments had poorer survival rates (a 450% increased risk of dying if the ELF fields were 3 mG and above). In the second study, children who were recovering in 2 mG and above ELF environments were 300% more likely to die than children exposed to 1 mG and below. In



this second study, children recovering in ELF environments between 1 and 2 mG also had poorer survival rates, where the increased risk of dying was 280%. (10) These two studies give powerful new information that ELF exposures in children can be harmful at levels above even 1 mG. The third study looked what risks for cancer a child would have later in life, if that child was raised in a home within 300 meters of a high-voltage electric power line. (11) For children who were raised for their first five years of life within 300 meters, they have a life-time risk that is 500% higher for developing some kinds of cancers.

**Children who have leukemia and are in recovery have poorer survival rates if their ELF exposure at home (or where they are recovering) is between 1mG and 2 mG in one study; over 3 mG in another study.**

Given the extensive study of childhood leukemia risks associated with ELF, and the relatively consistent findings that exposures in the 2 mG to 4 mG range are associated with increased risk to children, a 1 mG limit for habitable space is recommended for new construction. While it is difficult and expensive to retrofit existing habitable space to a 1 mG level, and is also recommended as a desirable target for existing residences and places where children and pregnant women may spend prolonged periods of time.

**New ELF public exposure limits are warranted at this time, given the existing scientific evidence and need for public health policy intervention and prevention.**

### *3. Brain Tumors and Acoustic Neuromas*

Radiofrequency radiation from cell phone and cordless phone exposure has been linked in more than one dozen studies to increased risk for brain tumors and/or acoustic neuromas (a tumor in the brain on a nerve related to our hearing).

**People who have used a cell phone for ten years or more have higher rates of malignant brain tumor and acoustic neuromas. It is worse if the cell phone has been used primarily on one side of the head.**

For brain tumors, people who have used a cell phone for 10 years or longer have a 20% increase in risk (when the cell phone is used on both sides of the head). For people who have used a cell phone for 10 years or longer predominantly on one side of the head, there is a 200% increased risk of a brain tumor. This information relies on the combined results of many brain tumor/cell phone studies taken together (a meta-analysis of studies).

**People who have used a cordless phone for ten years or more have higher rates of malignant brain tumor and acoustic neuromas. It is worse if the cordless phone has been used primarily on one side of the head.**

The risk of brain tumor (high-grade malignant glioma) from cordless phone use is 220% higher (both sides of the head). The risk from use of a cordless phone is 470% higher when used mostly on only one side of the head.

For acoustic neuromas, there is a 30% increased risk with cell phone use at ten years and longer; and a 240% increased risk of acoustic neuroma when the cell phone is used mainly on one side of the head. These risks are based on the combined results of several studies (a meta-analysis of studies).

For use of cordless phones, the increased risk of acoustic neuroma is three-fold higher (310%) when the phone is mainly used on one side of the head.

**The current standard for exposure to the emissions of cell phones and cordless phones is not safe considering studies reporting long-term brain tumor and acoustic neuroma risks.**

Other indications that radiofrequency radiation can cause brain tumors comes from exposures to low-level RF other than from cell phone or cordless phone use. Studies of people who are exposed in their work (occupational exposure) show higher brain tumor rates as well. Kheifets (1995) reported a 10% to 20% increased risk of brain cancer for those employed in electrical occupations. This meta-analysis surveyed 29 published studies of brain cancer in relation to occupational EMFs exposure or work in electrical occupations. (6). The evidence for a link between other sources of RF exposure like working at a job with EMFs exposure is consistent with a moderately elevated risk of developing brain tumors.

#### *4. Other Adult Cancers*

There are multiple studies that show statistically significant relationships between occupational exposure and leukemia in adults (see Chapter 11), in spite of major limitations in the exposure assessment. A very recent study by Lowenthal et al. (2007) investigated leukemia in adults in relation to residence near to high-voltage power lines. While they found elevated risk in all adults living near to the high voltage power lines, they found an OR of 3.23 (95% CI = 1.26-8.29) for individuals who spent the first 15 years of life within 300 m of the power line. This study provides support for two important conclusions: adult leukemia is also associated with EMF exposure, and exposure during childhood increases risk of adult disease.

A significant excess risk for adult brain tumors in electrical workers and those adults with occupational EMF exposure was reported in a meta-analysis (review of many individual studies) by Kheifets et al., (1995). This is about the same size risk for lung cancer and secondhand smoke (US DHHS, 2006). A total of 29 studies with populations from 12 countries were included in this meta-analysis. The relative risk was reported as 1.16 (CI = 1.08 – 1.24) or a 16% increased risk



for all brain tumors. For gliomas, the risk estimate was reported to be 1.39 (1.07 – 1.82) or a 39% increased risk for those in electrical occupations. A second meta-analysis published by Kheifets et al., ((2001) added results of 9 new studies published after 1995. It reported a new pooled estimate (OR = 1.16, 1.08 – 1.01) that showed little change in the risk estimate overall from 1995.

The evidence for a relationship between exposure and breast cancer is relatively strong in men (Erren, 2001), and some (by no means all) studies show female breast cancer also to be elevated with increased exposure (see Chapter 12). Brain tumors and acoustic neuromas are more common in exposed persons (see Chapter 10). There is less published evidence on other cancers, but Charles et al. (2003) report that workers in the highest 10% category for EMF exposure were twice as likely to die of prostate cancer as those exposed at lower levels (OR 2.02, 95% CI = 1.34-3.04). Villeneuve et al. (2000) report statistically significant elevations of non-Hodgkin's lymphoma in electric utility workers in relation to EMF exposure, while Tynes et al. (2003) report elevated rates of malignant melanoma in persons living near to high voltage power lines. While these observations need replication, they suggest a relationship between exposure and cancer in adults beyond leukemia.

In total the scientific evidence for adult disease associated with EMF exposure is sufficiently strong for adult cancers that preventive steps are appropriate, even if not all reports have shown exactly the same positive relationship. This is especially true since many factors reduce our ability to see disease patterns that might be related to EMF exposure: there is no unexposed population for comparison, for example, and other difficulties in exposure assessment. The evidence for a relationship between EMF exposure and adult cancers and neurodegenerative diseases is sufficiently strong at present to merit preventive actions to reduce EMF exposure.

## *5. Breast Cancer*

There is rather strong evidence from multiple areas of scientific investigation that ELF is related to breast cancer. Over the last two decades there have been numerous epidemiological studies (studies of human illness) on breast cancer in both men and women, although this relationship remains controversial among scientists. Many of these studies report that ELF exposures are related to increased risk of breast cancer (not all studies report such effects, but then, we do not expect 100% or even 50% consistency in results in science, and do not require it to take reasonable preventative action).

**The evidence from studies on women in the workplace rather strongly suggests that ELF is a risk factor for breast cancer for women with long-term exposures of 10 mG and higher.**

Breast cancer studies of people who work in relatively high ELF exposures (10 mG and above) show higher rates of this disease. Most studies of workers who are exposed to ELF have defined high exposure levels to be somewhere between 2 mG and 10 mG; however this kind of mixing of relatively low to relatively high ELF exposure just acts to dilute out real risk levels. Many of the occupational studies group exposures so that the highest group is exposed to 4 mG and above. What this means is that a) few people are exposed to much higher levels and b) illness patterns show up at relatively low ELF levels of 4 mG and above. This is another way of demonstrating



that existing ELF limits that are set at 933-1000 mG are irrelevant to the exposure levels reporting increased risks.

Laboratory studies that examine human breast cancer cells have shown that ELF exposure between 6 mG and 12 mG can interfere with protective effects of melatonin that fights the growth of these breast cancer cells. For a decade, there has been evidence that human breast cancer cells grow faster if exposed to ELF at low environmental levels. This is thought to be because ELF exposure can reduce melatonin levels in the body. The presence of melatonin in breast cancer cell cultures is known to reduce the growth of cancer cells. The absence of melatonin (because of ELF exposure or other reasons) is known to result in more cancer cell growth.

Laboratory studies of animals that have breast cancer tumors have been shown to have more tumors and larger tumors when exposed to ELF and a chemical tumor promoter at the same time. These studies taken together indicate that ELF is a likely risk factor for breast cancer, and that ELF levels of importance are no higher than many people are exposed to at home and at work. A reasonable suspicion of risk exists and is sufficient evidence on which to recommend new ELF limits; and to warrant preventative action.

**Given the very high lifetime risks for developing breast cancer, and the critical importance of prevention; ELF exposures should be reduced for all people who are in high ELF environments for prolonged periods of time.**

Reducing ELF exposure is particularly important for people who have breast cancer. The recovery environment should have low ELF levels given the evidence for poorer survival rates for childhood leukemia patients in ELF fields over 2 mG or 3 mG. Preventative action for those who may be at higher risk for breast cancer is also warranted (particularly for those taking tamoxifen as a way to reduce the risk of getting breast cancer, since in addition to reducing the effectiveness of melatonin, ELF exposure may also reduce the effectiveness of tamoxifen at these same low exposure levels). There is no excuse for ignoring the substantial body of evidence we already have that supports an association between breast cancer and ELF exposure; waiting for conclusive evidence is untenable given the enormous costs and societal and personal burdens caused by this disease.

**Studies of human breast cancer cells and some animal studies show that ELF is likely to be a risk factor for breast cancer. There is supporting evidence for a link between breast cancer and exposure to ELF that comes from cell and animal studies, as well as studies of human breast cancers.**

These are just some of the cancer issues to discuss. It may be reasonable now to make the assumption that all cancers, and other disease endpoints might be related to, or worsened by exposures to EMFs (both ELF and RF).

If one or more cancers are related, why would not all cancer risks be at issue? It can no longer be said that the current state of knowledge rules out or precludes risks to human health. The

enormous societal costs and impacts on human suffering by not dealing proactively with this issue require substantive public health policy actions; and actions of governmental agencies charged with the protection of public health to act on the basis of the evidence at hand.

## **B. Changes in the Nervous System and Brain Function**

Exposure to electromagnetic fields has been studied in connection with Alzheimer's disease, motor neuron disease and Parkinson's disease. (4) These diseases all involve the death of specific neurons and may be classified as neurodegenerative diseases. There is evidence that high levels of amyloid beta are a risk factor for Alzheimer's disease, and exposure to ELF can increase this substance in the brain. There is considerable evidence that melatonin can protect the brain against damage leading to Alzheimer's disease, and also strong evidence that exposure to ELF can reduce melatonin levels. Thus it is hypothesized that one of the body's main protections against developing Alzheimer's disease (melatonin) is less available to the body when people are exposed to ELF. Prolonged exposure to ELF fields could alter calcium ( $\text{Ca}^{2+}$ ) levels in neurons and induce oxidative stress (4). It is also possible that prolonged exposure to ELF fields may stimulate neurons (particularly large motor neurons) into synchronous firing, leading to damage by the buildup of toxins.

Evidence for a relationship between exposure and the neurodegenerative diseases, Alzheimer's and amyotrophic lateral sclerosis (ALS), is strong and relatively consistent (see Chapter 12). While not every publication shows a statistically significant relationship between exposure and disease, ORs of 2.3 (95% CI = 1.0-5.1 in Qio et al., 2004), of 2.3 (95% CI = 1.6-3.3 in Feychting et al., 2003) and of 4.0 (95% CI = 1.4-11.7 in Hakansson et al., 2003) for Alzheimer's Disease, and of 3.1 (95% CI = 1.0-9.8 in Savitz et al., 1998) and 2.2 (95% CI = 1.0-4.7 in Hakansson et al., 2003) for ALS cannot be simply ignored.

**Alzheimer's disease is a disease of the nervous system. There is strong evidence that long-term exposure to ELF is a risk factor for Alzheimer's disease.**

Concern has also been raised that humans with epileptic disorders could be more susceptible to RF exposure. Low-level RF exposure may be a stressor based on similarities of neurological effects to other known stressors; low-level RF activates both endogenous opioids and other substances in the brain that function in a similar manner to psychoactive drug actions. Such effects in laboratory animals mimic the effects of drugs on the part of the brain that is involved in addiction.

Laboratory studies show that the nervous system of both humans and animals is sensitive to ELF and RF. Measurable changes in brain function and behavior occur at levels associated with new technologies including cell phone use. Exposing humans to cell phone radiation can change brainwave activity at levels as low as 0.1 watt per kilogram SAR (W/Kg)\*\*\* in comparison to the US allowable level of 1.6 W/Kg and the International Commission for Non-ionizing Radiation Protection (ICNIRP) allowable level of 2.0 W/Kg. It can affect memory and learning. It can affect normal brainwave activity. ELF and RF exposures at low levels are able to change behavior in animals.



**There is little doubt that electromagnetic fields emitted by cell phones and cell phone use affect electrical activity of the brain.**

Effects on brain function seem to depend in some cases on the mental load of the subject during exposure (the brain is less able to do two jobs well simultaneously when the same part of the brain is involved in both tasks). Some studies show that cell phone exposure speeds up the brain's activity level; but also that the efficiency and judgment of the brain are diminished at the same time. One study reported that teenage drivers had slowed responses when driving and exposed to cell phone radiation, comparable to response times of elderly people. Faster thinking does not necessarily mean better quality thinking.

**Changes in the way in which the brain and nervous system react depend very much on the specific exposures. Most studies only look at short-term effects, so the long-term consequences of exposures are not known.**

Factors that determine effects can depend on head shape and size, the location, size and shape of internal brain structures, thinness of the head and face, hydration of tissues, thickness of various tissues, dielectric constant of the tissues and so on. Age of the individual and state of health also appear to be important variables. Exposure conditions also greatly influence the outcome of studies, and can have opposite results depending on the conditions of exposure including frequency, waveform, orientation of exposure, duration of exposure, number of exposures, any pulse modulation of the signal, and when effects are measured (some responses to RF are delayed). There is large variability in the results of ELF and RF testing, which would be expected based on the large variability of factors that can influence test results. However, it is clearly demonstrated that under some conditions of exposure, the brain and nervous system functions of humans are altered. The consequence of long-term or prolonged exposures have not been thoroughly studied in either adults or in children.

**The consequence of prolonged exposures to children, whose nervous systems continue to develop until late adolescence, is unknown at this time. This could have serious implications to adult health and functioning in society if years of exposure of the young to both ELF and RF result in diminished capacity for thinking, judgment, memory, learning, and control over behavior.**

People who are chronically exposed to low-level wireless antenna emissions report symptoms such as problems in sleeping (insomnia), fatigue, headache, dizziness, grogginess, lack of concentration, memory problems, ringing in the ears (tinnitus), problems with balance and orientation, and difficulty in multi-tasking. In children, exposures to cell phone radiation have resulted in changes in brain oscillatory activity during some memory tasks. Although scientific studies as yet have not been able to confirm a cause-and-effect relationship; these complaints are

widespread and the cause of significant public concern in some countries where wireless technologies are fairly mature and widely distributed (Sweden, Denmark, France, Germany, Italy, Switzerland, Austria, Greece, Israel). For example, the roll-out of the new 3<sup>rd</sup> Generation wireless phones (and related community-wide antenna RF emissions in the Netherlands) caused almost immediate public complaints of illness.(5)

Conflicting results from those few studies that have been conducted may be based on the difficulty in providing non-exposed environments for testing to compare to environments that are intentionally exposed. People traveling to laboratories for testing are pre-exposed to a multitude of RF and ELF exposures, so they may already be symptomatic prior to actual testing. Also complicating this is good evidence that RF exposures testing behavioral changes show delayed results; effects are observed after termination of RF exposure. This suggests a persistent change in the nervous system that may be evident only after time has passed, so is not observed during a short testing period.

**The effects of long-term exposure to wireless technologies including emissions from cell phones and other personal devices, and from whole-body exposure to RF transmissions from cell towers and antennas is simply not known yet with certainty. However, the body of evidence at hand suggests that bioeffects and health impacts can and do occur at exquisitely low exposure levels: levels that can be thousands of times below public safety limits.**

The evidence reasonably points to the potential for serious public health consequences (and economic costs), which will be of global concern with the widespread public use of, and exposure to such emissions. Even a small increase in disease incidence or functional loss of cognition related to new wireless exposures would have a large public health, societal and economic consequences. Epidemiological studies can report harm to health only after decades of exposure, and where large effects can be seen across “average” populations; so these early warnings of possible harm should be taken seriously now by decision-makers.

### **C. Effects on Genes (DNA)**

Cancer risk is related to DNA damage, which alters the genetic blueprint for growth and development. If DNA is damaged (the genes are damaged) there is a risk that these damaged cells will not die. Instead they will continue to reproduce themselves with damaged DNA, and this is one necessary pre-condition for cancer. Reduced DNA repair may also be an important part of this story. When the rate of damage to DNA exceeds the rate at which DNA can be repaired, there is the possibility of retaining mutations and initiating cancer. Studies on how ELF and RF may affect genes and DNA is important, because of the possible link to cancer. Even ten years ago, most people believed that very weak ELF and RF fields could not possibly have any effect at all on DNA and how cells work (or are damaged and cannot do their work properly). The argument was that these weak fields are do not possess enough energy (are not physically strong enough) to cause damage. However, there are multiple ways we already know about where energy is not the key factor in causing damage. For example, exposure to toxic chemicals can cause damage. Changing the balance of delicate biological processes, including

hormone balances in the body, can damage or destroy cells, and cause illness. In fact, many chronic diseases are directly related to this kind of damage that does not require any heating at all. Interference with cell communication (how cells interact) may either cause cancer directly or promote existing cancers to grow faster.

Using modern gene-testing techniques will probably give very useful information in the future about how EMFs targets and affects molecules in the body. At the gene level, there is some evidence now that EMFs (both ELF and RF) can cause changes in how DNA works. Laboratory studies have been conducted to see whether (and how) weak EMFs fields can affect how genes and proteins function. Such changes have been seen in some, but not all studies.

Small changes in protein or gene expression might be able to alter cell physiology, and might be able to cause later effects on health and well-being. The study of genes, proteins and EMFs is still in its infancy, however, by having some confirmation at the gene level and protein level that weak EMFs exposures do register changes may be an important step in establishing what risks to health can occur.

What is remarkable about studies on DNA, genes and proteins and EMFs is that there should be no effect at all if it were true that EMFs is too weak to cause damage. Scientists who believe that the energy of EMFs is insignificant and unlikely to cause harm have a hard time explaining these changes, so are inclined to just ignore them. The trouble with this view is that the effects are occurring. Not being able to explain these effects is not a good reason to consider them imaginary or unimportant.

The European research program (REFLEX) documented many changes in normal biological functioning in tests on DNA (3). The significance of these results is that such effects are directly related to the question of whether human health risks might occur, when these changes in genes and DNA happen. This large research effort produced information on EMFs effects from more than a dozen different researchers. Some of the key findings included:

*“Gene mutations, cell proliferation and apoptosis are caused by or result in altered gene and protein expression profiles. The convergence of these events is required for the development of all chronic diseases.” (3)*

*“Genotoxic effects and a modified expression of numerous genes and proteins after EMF exposure could be demonstrated with great certainty.” (3)*

*“RF-EMF produced genotoxic effects in fibroblasts, HL-60 cells, granulosa cells of rats and neural progenitor cells derived from mouse embryonic stem cells.” (Participants 2, 3 and 4). (3)*

*“Cells responded to RF exposure between SAR levels of 0.3 and 2 W/Kg with a significant increase in single- and double-strand DNA breaks and in micronuclei frequency.” (Participants 2, 3 and 4). (3)*

*“In HL-60 cells an increase in intracellular generation of free radicals accompanying RF-EMF exposure could clearly be demonstrated.” (Participant 2). (3)*

*“The induced DNA damage was not based on thermal effects and arouses consideration about the environmental safety limits for ELF-EMF exposure.” (3)*



*“The effects were clearly more pronounced in cells from older donors, which could point to an age-related decrease of DNA repair efficiency of ELF-EMF induced DNA strand breaks.” (3)*

**Both ELF and RF exposures can be considered genotoxic (will damage DNA) under certain conditions of exposure, including exposure levels that are lower than existing safety limits.**

#### **D. Effects on Stress Proteins (Heat Shock Proteins)**

In nearly every living organism, there is a special protection launched by cells when they are under attack from environmental toxins or adverse environmental conditions. This is called a stress response, and what are produced are stress proteins (also known as heat shock proteins). Plants, animals and bacteria all produce stress proteins to survive environmental stressors like high temperatures, lack of oxygen, heavy metal poisoning, and oxidative stress (a cause of premature aging). We can now add ELF and RF exposures to this list of environmental stressors that cause a physiological stress response.

**Very low-level ELF and RF exposures can cause cells to produce stress proteins, meaning that the cell recognizes ELF and RF exposures as harmful. This is another important way in which scientists have documented that ELF and RF exposures can be harmful, and it happens at levels far below the existing public safety standards.**

An additional concern is that if the stress goes on too long, the protective effect is diminished. There is a reduced response if the stress goes on too long, and the protective effect is reduced. This means the cell is less protected against damage, and it is why prolonged or chronic exposures may be quite harmful, even at very low intensities.

The biochemical pathway that is activated is the same for ELF and for RF exposures, and it is non-thermal (does not require heating or induced electrical currents, and thus the safety standards based on protection from heating are irrelevant and not protective). ELF exposure levels of only 5 to 10 mG have been shown to activate the stress response genes (Table 2, Section 6). The specific absorption rate or SAR is not the appropriate measure of biological threshold or dose, and should not be used as the basis for a safety standard, since SAR only regulates against thermal damage.

#### **E. Effects on the Immune System**

The immune system is another defense we have against invading organisms (viruses, bacteria, and other foreign molecules). It protects us against illness, infectious diseases, and tumor cells.

There are many different kinds of immune cells; each type of cell has a particular purpose, and is launched to defend the body against different kinds of exposures that the body determines might be harmful.

**There is substantial evidence that ELF and RF can cause inflammatory reactions, allergy reactions and change normal immune function at levels allowed by current public safety standards.**

The body's immune defense system senses danger from ELF and RF exposures, and targets an immune defense against these fields, much like the body's reaction in producing stress proteins. These are additional indicators that very low intensity ELF and RF exposures are a) recognized by cells and b) can cause reactions as if the exposure is harmful. Chronic exposure to factors that increase allergic and inflammatory responses on a continuing basis are likely to be harmful to health. Chronic inflammatory responses can lead to cellular, tissue and organ damage over time. Many chronic diseases are thought to be related to chronic problems with immune system function.

The release of inflammatory substances, such as histamine, are well-known to cause skin reactions, swelling, allergic hypersensitivity and other conditions that are normally associated with some kind of defense mechanism. The human immune system is part of a general defense barrier that protects against harmful exposures from the surrounding environment. When the immune system is aggravated by some kind of attack, there are many kinds of immune cells that can respond. Anything that triggers an immune response should be carefully evaluated, since chronic stimulation of the immune system may over time impair the system's ability to respond in the normal fashion.

Measurable physiological changes (mast cell increases in the skin, for example that are markers of allergic response and inflammatory cell response) are triggered by ELF and RF at very low intensities. Mast cells, when activated by ELF or RF, will break (degranulate) and release irritating chemicals that cause the symptoms of allergic skin reactions.

There is very clear evidence that exposures to ELF and RF at levels associated with cell phone use, computers, video display terminals, televisions, and other sources can cause these skin reactions. Changes in skin sensitivity have been measured by skin biopsy, and the findings are remarkable. Some of these reactions happen at levels equivalent to those of wireless technologies in daily life. Mast cells are also found in the brain and heart, perhaps targets of immune response by cells responding to ELF and RF exposures, and this might account for some of the other symptoms commonly reported (headache, sensitivity to light, heart arrhythmias and other cardiac symptoms). Chronic provocation by exposure to ELF and RF can lead to immune dysfunction, chronic allergic responses, inflammatory diseases and ill health if they occur on a continuing basis over time.

These clinical findings may account for reports of persons with electrical hypersensitivity, which is a condition where there is intolerance for any level of exposure to ELF and/or RF. Although there is not yet a substantial scientific assessment (under controlled conditions, if that is even possible); anecdotal reports from many countries show that estimates range from 3% to perhaps 5% of populations, and it is a growing problem. Electrical hypersensitivity, like multiple



chemical sensitivity, can be disabling and require the affected person to make drastic changes in work and living circumstances, and suffer large economic losses and loss of personal freedom. In Sweden, electrohypersensitivity (EHS) is officially recognized as fully functional impairment (i.e., it is not regarded as a disease – see Section 6, Appendix A).

## **F. Plausible Biological Mechanisms**

Plausible biological mechanisms are already identified that can reasonably account for most biological effects reported for exposure to RF and ELF at low-intensity levels (oxidative stress and DNA damage from free radicals leading to genotoxicity; molecular mechanisms at very low energies are plausible links to disease, e.g., effect on electron transfer rates linked to oxidative damage, DNA activation linked to abnormal biosynthesis and mutation). It is also important to remember that traditional public health and epidemiological determinations do not require a proven mechanism before inferring a causal link between EMFs exposure and disease (12). Many times, proof of mechanism is not known before wise public health responses are implemented.

*“Obviously, melatonin’s ability to protect DNA from oxidative damage has implications for many types of cancer, including leukemia, considering that DNA damage due to free radicals is believed to be the initial oncogenic event in a majority of human cancers [Cerutti et al., 1994]. In addition to cancer, free radical damage to the central nervous system is a significant component of a variety of neurodegenerative diseases of the aged including Alzheimer’s disease and Parkinsonism. In experimental animal models of both of these conditions, melatonin has proven highly effective in forestalling their onset, and reducing their severity [Reiter et al., 2001].” (13)*

**Oxidative stress through the action of free radical damage to DNA is a plausible biological mechanism for cancer and diseases that involve damage from ELF to the central nervous system.**

## **G. Another Way of Looking at EMFs: Therapeutic Uses**

Many people are surprised to learn that certain kinds of EMFs treatments actually can heal. These are medical treatments that use EMFs in specific ways to help in healing bone fractures, to heal wounds to the skin and underlying tissues, to reduce pain and swelling, and for other post-surgical needs. Some forms of EMFs exposure are used to treat depression.

EMFs have been shown to be effective in treating conditions of disease at energy levels far below current public exposure standards. This leads to the obvious question. How can scientists dispute the harmful effects of EMF exposures while at the same time using forms of EMF treatment that are proven to heal the body?

**Medical conditions are successfully treated using EMFs at levels below current public safety standards, proving another way that the body recognizes and responds to low-intensity EMF signals. Otherwise, these medical treatments could not work. The FDA has approved EMFs medical treatment devices, so is clearly aware of this paradox.**

Random exposures to EMFs, as opposed to EMFs exposures done with clinical oversight, could lead to harm just like the unsupervised use of pharmaceutical drugs. This evidence forms a strong warning that indiscriminate EMF exposure is probably a bad idea.

**No one would recommend that drugs used in medical treatments and prevention of disease be randomly given to the public, especially to children. Yet, random and involuntary exposures to EMFs occur all the time in daily life.**

The consequence of multiple sources of EMFs exposures in daily life, with no regard to cumulative exposures or to potentially harmful combinations of EMFs exposures means several things. First, it makes it very difficult to do clinical studies because it is almost impossible to find anyone who is not already exposed. Second, people with and without diseases have multiple and overlapping exposures – this will vary from person to person.

Just as ionizing radiation can be used to effectively diagnose disease and treat cancer, it is also a cause of cancer under different exposure conditions. Since EMFs are both a cause of disease, and also used for treatment of disease, it is vitally important that public exposure standards reflect our current understanding of the biological potency of EMF exposures, and develop both new public safety limits and measures to prevent future exposures.

### **III. EMF EXPOSURE AND PRUDENT PUBLIC HEALTH PLANNING**

- **The scientific evidence is sufficient to warrant regulatory action for ELF; and it is substantial enough to warrant preventative actions for RF.**
- **The standard of evidence for judging the emerging scientific evidence necessary to take action should be proportionate to the impacts on health and well-being**
- **The exposures are widespread.**
- **Widely accepted standards for judging the science are used in this assessment.**

Public exposure to electromagnetic radiation (power-line frequencies, radiofrequency and microwave) is growing exponentially worldwide. There is a rapid increase in electrification in developing countries, even in rural areas. Most members of society now have and use cordless phones, cellular phones, and pagers. In addition, most populations are also exposed to antennas in communities designed to transmit wireless RF signals. Some developing countries have even given up running land lines because of expense and the easy access to cell phones. Long-term and cumulative exposure to such massively increased RF has no precedent in human history. Furthermore, the most pronounced change is for children, who now routinely spend hours each day on the cell phone. Everyone is exposed to a greater or lesser extent. No one can avoid exposure, since even if they live on a mountain-top without electricity there will likely be exposure to communication-frequency RF exposure. Vulnerable populations (pregnant women, very young children, elderly persons, the poor) are exposed to the same degree as the general population. Therefore it is imperative to consider ways in which to evaluate risk and reduce exposure. Good public health policy requires preventative action proportionate to the potential risk of harm and the public health consequence of taking no action.



## **IV. RECOMMENDED ACTIONS**

### **A. Defining new exposure standards for ELF**

This chapter concludes that new ELF limits are warranted based on a public health analysis of the overall existing scientific evidence. The public health view is that new ELF limits are needed now. They should reflect environmental levels of ELF that have been demonstrated to increase risk for childhood leukemia, and possibly other cancers and neurological diseases. ELF limits should be set below those exposure levels that have been linked in childhood leukemia studies to increased risk of disease, plus an additional safety factor. It is no longer acceptable to build new power lines and electrical facilities that place people in ELF environments that have been determined to be risky. These levels are in the 2 to 4 milligauss\* (mG) range, not in the 10s of mG or 100s of mG. The existing ICNIRP limit is 1000 mG (904 mG in the US) for ELF is outdated and based on faulty assumptions. These limits are can no longer be said to be protective of public health and they should be replaced. A safety buffer or safety factor should also be applied to a new, biologically-based ELF limit, and the conventional approach is to add a safety factor lower than the risk level.

While new ELF limits are being developed and implemented, a reasonable approach would be a 1 mG planning limit for habitable space adjacent to all new or upgraded power lines and a 2 mG limit for all other new construction. It is also recommended for that a 1 mG limit be established for existing habitable space for children and/or women who are pregnant (because of the possible link between childhood leukemia and *in utero* exposure to ELF). This recommendation is based on the assumption that a higher burden of protection is required for children who cannot protect themselves, and who are at risk for childhood leukemia at rates that are traditionally high enough to trigger regulatory action. This situation in particular warrants extending the 1 mG limit to existing occupied space. "Establish" in this case probably means formal public advisories from relevant health agencies. While it is not realistic to reconstruct all existing electrical distribution systems, in the short term; steps to reduce exposure from these existing systems need to be initiated, especially in places where children spend time, and should be encouraged. These limits should reflect the exposures that are commonly associated with increased risk of child hood leukemia (in the 2 to 5 mG range for all children, and over 1.4 mG for children age 6 and younger). Nearly all of the occupational studies for adult cancers and neurological diseases

report their highest exposure category is 4 mG and above, so that new ELF limits should target the exposure ranges of interest, and not necessarily higher ranges.

Avoiding chronic ELF exposure in schools, homes and the workplace above levels associated with increased risk of disease will also avoid most of the possible bioactive parameters of ELF discussed in the relevant literature.

## **B. Defining preventative actions for reduction in RF exposures**

Given the scientific evidence at hand (Chapter 17), the rapid deployment of new wireless technologies that chronically expose people to pulsed RF at levels reported to cause bioeffects, which in turn, could reasonably be presumed to lead to serious health impacts, is of public health concern. Section 17 summarizes evidence that has resulted in a public health recommendation that preventative action is warranted to reduce or minimize RF exposures to the public. There is suggestive to strongly suggestive evidence that RF exposures may cause changes in cell membrane function, cell communication, cell metabolism, activation of proto-oncogenes and can trigger the production of stress proteins at exposure levels below current regulatory limits. Resulting effects can include DNA breaks and chromosome aberrations, cell death including death of brain neurons, increased free radical production, activation of the endogenous opioid system, cell stress and premature aging, changes in brain function including memory loss, retarded learning, slower motor function and other performance impairment in children, headaches and fatigue, sleep disorders, neurodegenerative conditions, reduction in melatonin secretion and cancers (Chapters 5, 6, 7, 8, 9, 10, and 12).

As early as 2000, some experts in bioelectromagnetics promoted a  $0.1 \mu\text{W}/\text{cm}^2$  limit (which is 0.614 Volts per meter) for ambient outdoor exposure to pulsed RF, so generally in cities, the public would have adequate protection against involuntary exposure to pulsed radiofrequency (e.g., from cell towers, and other wireless technologies). The Salzburg Resolution of 2000 set a target of  $0.1 \mu\text{W}/\text{cm}^2$  (or 0.614 V/m) for public exposure to pulsed radiofrequency. Since then, there are many credible anecdotal reports of unwellness and illness in the vicinity of wireless transmitters (wireless voice and data communication antennas) at lower levels. Effects include sleep disruption, impairment of memory and concentration, fatigue, headache, skin disorders,

visual symptoms (floaters), nausea, loss of appetite, tinnitus, and cardiac problems (racing heartbeat). There are some credible articles from researchers reporting that cell tower -level RF exposures (estimated to be between 0.01 and 0.5  $\mu\text{W}/\text{cm}^2$ ) produce ill-effects in populations living up to several hundred meters from wireless antenna sites.

This information now argues for thresholds or guidelines that are substantially below current FCC and ICNIPR standards for whole body exposure. Uncertainty about how low such standards might have to go to be prudent from a public health standpoint should not prevent reasonable efforts to respond to the information at hand. No lower limit for bioeffects and adverse health effects from RF has been established, so the possible health risks of wireless WLAN and WI-FI systems, for example, will require further research and no assertion of safety at any level of wireless exposure (chronic exposure) can be made at this time. The lower limit for reported human health effects has dropped 100-fold below the safety standard (for mobile phones and PDAs); 1000- to 10,000-fold for other wireless (cell towers at distance; WI-FI and WLAN devices). The entire basis for safety standards is called into question, and it is not unreasonable to question the safety of RF at any level.

A cautionary target level for pulsed RF exposures for ambient wireless that could be applied to RF sources from cell tower antennas, WI-FI, WI-MAX and other similar sources is proposed. The recommended cautionary target level is 0.1 microwatts per centimeter squared ( $\mu\text{W}/\text{cm}^2$ )\*\* (or 0.614 Volts per meter or V/m)\*\* for pulsed RF where these exposures affect the general public; this advisory is proportionate to the evidence and in accord with prudent public health policy. A precautionary limit of 0.1  $\mu\text{W}/\text{cm}^2$  should be adopted for outdoor, cumulative RF exposure. This reflects the current RF science and prudent public health response that would reasonably be set for pulsed RF (ambient) exposures where people live, work and go to school. This level of RF is experienced as whole-body exposure, and can be a chronic exposure where there is wireless coverage present for voice and data transmission for cell phones, pagers and PDAs and other sources of radiofrequency radiation. An outdoor precautionary limit of 0.1  $\mu\text{W}/\text{cm}^2$  would mean an even lower exposure level inside buildings, perhaps as low as 0.01  $\mu\text{W}/\text{cm}^2$ . Some studies and many anecdotal reports on ill health have been reported at lower levels than this; however, for the present time, it could prevent some of the most disproportionate burdens placed on the public nearest to such installations. Although this RF target level does not preclude further rollout of WI-FI technologies, we also recommend that wired alternatives to WI-FI be implemented, particularly in schools and libraries so that children are not subjected to

elevated RF levels until more is understood about possible health impacts. This recommendation should be seen as an interim precautionary limit that is intended to guide preventative actions; and more conservative limits may be needed in the future.

Broadcast facilities that chronically expose nearby residents to elevated RF levels from AM, FM and television antenna transmission are also of public health concern given the potential for very high RF exposures near these facilities (antenna farms). RF levels can be in the 10s to several 100's of  $\mu\text{W}/\text{cm}^2$  in residential areas within half a mile of some broadcast sites (for example, Lookout Mountain, Colorado and Awbrey Butte, Bend, Oregon). Such facilities that are located in, or expose residential populations and schools to elevated levels of RF will very likely need to be re-evaluated for safety.

For emissions from wireless devices (cell phones, personal digital assistant or PDA devices, etc) there is enough evidence for increased risk of brain tumors and acoustic neuromas now to warrant intervention with respect to their use. Redesign of cell phones and PDAs could prevent direct head and eye exposure, for example, by designing new units so that they work only with a wired headset or on speakerphone mode.

These effects can reasonably be presumed to result in adverse health effects and disease with chronic and uncontrolled exposures, and children may be particularly vulnerable. The young are also largely unable to remove themselves from such environments. Second-hand radiation, like second-hand smoke is an issue of public health concern based on the evidence at hand.

## V. CONCLUSIONS

- We cannot afford ‘business as usual’ any longer. It is time that planning for new power lines and for new homes, schools and other habitable spaces around them is done with routine provision for low-ELF environments. The business-as-usual deployment of new wireless technologies is likely to be risky and harder to change if society does not make some educated decisions about limits soon. Research must continue to define what levels of RF related to new wireless technologies are acceptable; but more research should not prevent or delay substantive changes today that might save money, lives and societal disruption tomorrow.
- New regulatory limits for ELF are warranted. ELF limits should be set below those exposure levels that have been linked in childhood leukemia studies to increased risk of disease, plus an additional safety factor. It is no longer acceptable to build new power lines and electrical facilities that place people in ELF environments that have been determined to be risky (at levels generally at 2 mG and above).
- While new ELF limits are being developed and implemented, a reasonable approach would be a 1 mG planning limit for habitable space adjacent to all new or upgraded power lines and a 2 mG limit for all other new construction. It is also recommended for that a 1 mG limit be established for existing habitable space for children and/or women who are pregnant. This recommendation is based on the assumption that a higher burden of protection is required for children who cannot protect themselves, and who are at risk for childhood leukemia at rates that are traditionally high enough to trigger regulatory action. This situation in particular warrants extending the 1 mG limit to existing occupied space. "Establish" in this case probably means formal public advisories from relevant health agencies.
- While it is not realistic to reconstruct all existing electrical distributions systems, in the short term; steps to reduce exposure from these existing systems need to be initiated, especially in places where children spend time, and should be encouraged.
- A precautionary limit of 0.1 ( $\mu\text{W}/\text{cm}^2$  (which is also 0.614 Volts per meter) should be adopted for outdoor, cumulative RF exposure. This reflects the current RF science and prudent public health response that would reasonably be set for pulsed RF (ambient) exposures where people



live, work and go to school. This level of RF is experienced as whole-body exposure, and can be a chronic exposure where there is wireless coverage present for voice and data transmission for cell phones, pagers and PDAs and other sources of radiofrequency radiation. Some studies and many anecdotal reports on ill health have been reported at lower levels than this; however, for the present time, it could prevent some of the most disproportionate burdens placed on the public nearest to such installations. Although this RF target level does not preclude further rollout of WI-FI technologies, we also recommend that wired alternatives to WI-FI be implemented, particularly in schools and libraries so that children are not subjected to elevated RF levels until more is understood about possible health impacts. This recommendation should be seen as an interim precautionary limit that is intended to guide preventative actions; and more conservative limits may be needed in the future.

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## **Some Quick Definitions for Units of Measurement of ELF and RF**

### **\*Milligauss (mG)**

*A milligauss is a measure of ELF intensity and is abbreviated mG. This is used to describe electromagnetic fields from appliances, power lines, interior electrical wiring.*

### **\*\*Microwatts per centimeter squared ( $\mu\text{W}/\text{cm}^2$ )**

*Radiofrequency radiation in terms of power density is measured in microwatts per centimeter squared and abbreviated ( $\mu\text{W}/\text{cm}^2$ ). It is used when talking about emissions from wireless facilities, and when describing ambient RF in the environment. The amount of allowable RF near a cell tower is 1000  $\mu\text{W}/\text{cm}^2$  for some cell phone frequencies, for example.*

### **\*\*\*Specific Absorption Rate (SAR is measured in watts per kilogram or W/Kg)**

*SAR stands for specific absorption rate. It is a calculation of how much RF energy is absorbed into the body, for example when a cell phone or cordless phone is pressed to the head. SAR is expressed in watts per kilogram of tissue (W/Kg). The amount of allowable energy into 1 gram of brain tissue from a cell phone is 1.6 W/Kg in the US. For whole body exposure, the exposure is 0.8 W/Kg averaged over 30 minutes for the general public. International standards in most countries are similar, but not exactly the same.*



December 7, 2016

William Dion  
19 David Drive  
Hudson, NH 03051

Dear Bill:

I carried out a magnetic field survey per your request. You were interested in the levels of magnetic fields around your home. I would like to thank you for making it possible for me to assist you with this survey.

Magnetic field measurements were taken at 19 David Drive in Hudson, NH. Attached is a copy of the results. The measurements were taken using a Dexcel, Fieldstar 1000, 3-axis meter. The Fieldstar is designed to measure 60 Hz fields. The results of these measurements are as follows:

Location:	19 David Drive, Hudson, NH 03051
Date:	December 7, 2016
Time:	10:30 am
Performed by:	Michael Corridori





Please be advised that the measurements provided represent the magnetic field levels at the time and date of the field visit and will fluctuate with the current flow of additional appliances and/or nearby distribution/transmission lines.

We understand that people have concerns about electric and magnetic fields (EMF), and take the issue very seriously. As well as offering measurements such as the ones we have performed for you, National Grid actively supports high-quality research into this issue, and has a policy of open and honest communication on this issue. I hope that the informational pamphlet, "Electric and Magnetic Fields," attached with this mailing is useful. Also included with this mailing is a table called "Examples of Magnetic Fields at Distances from Appliance Surfaces."

If you require additional information or have any questions, please feel free to email or contact me. Further information is also available on the National Grid web site which is located at:  
[http://www.nationalgridus.com/commitment/d3-3\\_emfs.asp](http://www.nationalgridus.com/commitment/d3-3_emfs.asp).

Sincerely yours,

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## Examples of Magnetic Fields at Distances From Appliance Surfaces

### Magnetic Field in milliGauss\*

Appliance	at 4 inches	at 1 foot	At 3 feet
Clothes Dryers	4.8 to 110	1.5 to 29	0.1 to 1
Clothes Washers	2.3 to 3	0.8 to 3.0	0.2 to 0.48
Coffee Makers	6 to 29	0.9 to 1.2	<0.1
Toasters	10 to 60	0.6 to 7.0	<0.1 to 0.11
Crock Pots	8 to 23	0.8 to 1.3	<0.1
Irons	12 to 45	1.2 to 3.1	0.1 to 0.2
Can Openers	1300 to 4000	31 to 280	0.5 to 7.0
Electric Mixers	58 to 1400	5 to 100	0.15 to 2.0
Blenders	50 to 220	5.2 to 17	0.3 to 1.1
Vacuum Cleaners	230 to 1300	20 to 180	1.2 to 18
Portable Heaters	11 to 280	1.5 to 40	0.1 to 2.5
Faust Blowers	3 to 120	0.25 to 37	<0.1 to 3.1
Hair Dryers	3 to 1400	<0.1 to 70	<0.1 to 2.8
Electric Shavers	14 to 1600	0.8 to 90	<0.1 to 3.3
Televisions	4.8 to 100	0.4 to 20	<0.1 to 1.5
Fluorescent Fixtures	40 to 123	2 to 32	<0.1 to 2.8
Fluorescent Desk Lamp	100 to 200	6 to 20	0.2 to 2.1
Saber & Circular Saws	200 to 2100	9 to 210	0.2 to 10
Electric Drills	350 to 500	22 to 31	0.8 to 2.0

\*The strength or intensity of magnetic fields is commonly measured in units called "gauss." A milliGauss is one one-thousandth of a gauss.

Source: Gauger, Jr., Household Appliance Magnetic Field Survey - IEEE Transactions on Power Apparatus and Systems PA-104 (Sept. 1985).