

# **Comments on the SCHEER final Opinion on the need of a revision of the annexes in the Council Recommendation 1999/519/EC and Directive 2013/35/EU, in view of the latest scientific evidence available with regard to radiofrequency (100kHz - 300GHz)**

October 11, 2023

In April 2023 the Scientific Committee on Health, Environmental and Emerging Risks (SCHEER), on request of the EU Commission services, advised in a report positively on the adoption of the International Commission on Non-Ionizing Radiation Protection (ICNIRP) 2020 limits on exposure to radiofrequency (RF) radiation. However, these limits are clearly insufficient for the protection of human health and the flora and fauna.

## **ICNIRP limits allow harmful exposure**

There is overwhelming evidence that exposure to RF levels well below the ICNIRP limits are harmful to human health. The effects are clearly established and range from increased risk of cancer, DNA-damage, oxidative stress, harmful effects on the brain, wellbeing, reproduction and the environment.

Furthermore there is no scientific evidence to support the position that people can tolerate long term whole body exposure 24 hours a day to a combination of frequencies that corresponds to the real exposure today at ICNIRP levels. No evidence shows the safety of ICNIRP limits for the 5G roll out.

## **The SCHEER opinion is clearly biased**

The opinion from the SCHEER is not an objective review of the available science. It is clearly biased in favor of the ICNIRP limits and thus the interests of the telecommunications industry. SCHEER claims it “could not identify moderate or strong level” of evidence for adverse health effects resulting from chronic or acute RF exposure. That opinion is not based on current knowledge of harmful effects from RF radiation exposure. This is caused by the single sided selection of pro-ICNIRP experts in the SCHEER working group with ties in terms of research funding from industry.

## **Most scientists agree that ICNIRP limits are inadequate**

ICNIRP guidelines have been shown to be flawed by scientists around the world. The ICBE-EMF 2022 review by 14 scientists clearly shows that the ICNIRP limits are based on flawed assumptions.<sup>1</sup> 259 Scientists in the EMF Scientists Appeal agree that ICNIRP guidelines do not protect against known harmful effects.<sup>2</sup> In addition, 433 scientists and medical doctors have endorsed the 5G Appeal asking for the 5G roll out to be halted due to the serious potential harmful effects.<sup>3</sup>

The SCHEER opinion is therefore a minority opinion. Most scientists in this field recommend far lower limits to protect against all harmful effects and more sensitive groups such as children, fetuses, the elderly and the electrosensitive. There is an urgent need for a complete re-evaluation of the science. This must be performed by experts without any ties to industry or to ICNIRP. Furthermore the composition of the expert group must be balanced with representatives from the researchers with no conflicts of interest.

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<sup>1</sup> [https://icbe-emf.org/wp-content/uploads/2022/10/ICBE-EMF-paper-12940\\_2022\\_900\\_OnlinePDF\\_Patched-1.pdf](https://icbe-emf.org/wp-content/uploads/2022/10/ICBE-EMF-paper-12940_2022_900_OnlinePDF_Patched-1.pdf)

<sup>2</sup> <https://emfscientist.org/>

<sup>3</sup> <http://www.5gappeal.eu/>