

Consultation Response Form
SCENIHR opinion on
“Possible effects of Electromagnetic Fields (EMF) on Human Health”

Contact details of person and/or institution submitting comments:

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Do you write as an individual or on behalf of an organization?

- **organization**

If you write on behalf of an organization, please specify the following:

- **Academic Business**

THE COMITÉ CIENTIFICO ASESOR SOBRE RADIOFRECUENCIAS (SCIENTIFIC ADVISORY COMMITTEE ON RADIOFRECUENCIAS) was created by the Madrid Complutense University Foundation in July 2005. Since July 2006 it has been providing advisory services to the Ministry of Industry, Commerce and Tourism in the framework of a collaboration agreement between said Ministry and the Foundation.

The Committee will make reports at the request of the Ministry of Industry in the framework of the work done by the Sectorial Commission Monitoring Technical Committee and in fact it will be at the service of all the administrations.

This is a multidisciplinary committee where all the specialities forming the scientific consensus about the nature of radiofrequencies and their possible biological effects are represented. It also counts on the participation of specialists in the fields of physics and medicine more related to the possible effects of radiofrequencies and to the analysis and understanding of these social movements.

All Committee members have experience and professional recognition in their respective disciplines.

Members:

Antonio Hernando Grande, University Professor (Physicist)
Juan Represa de la Guerra, University Professor (Physician)
Antoni Trilla García, University Professor (Epidemiologist)
Vicente Guillem Porta, University Professor (Oncologist)
José Luis Sebastian Franco, University Professor (Physicist)
Agustín Gregorio Zapata, University Professor (Biologist)
Pedro García Barreno, University Professor (Physician)

Isabel Varela Nieto, CSIC Researcher (Bio-Physician)
Mercedes Martínez Búrdalo, Head of the CSIC (Electromagnetic Radiation) Department
Francisco Vargas Marcos, Physician (Public Health, Environmental Health)
Emilio Muñoz, Head of the CSIC (Science, Technology and Society) Department

Comments on the Report on “Possible effects of Electromagnetic Fields (EMF) on Human Health”

This Advisory Committee has had the chance of recently answering a similar enquiry undertaken by the Ministry of Industry. In view of the science analysed, which is the same as that referred in the SCENIHR report, its conclusion is also that there are no new elements that advise a revision of the current limits.

For your information and as a contribution to the work of the SCENIHR, enclosed herewith is a copy of this report.

There is however a question that I would like to highlight, in the name of the Advisory Committee: the project submitted to enquiry due to the uncertainty elements it permanently contains and which form part of its own conclusions seems to be at an internal preparation stage rather than at an external consultation one.

It is normal, in the work done by a Scientific Committee, at the information collection phase and during its evaluation, that the team of experts considers its relevance in order to form an opinion. As set out in the text, all evidence must be weighed up. Once the evidence has been assessed, the opinion that should help the competent administrations taking decisions is defined.

In this sense, we believe that the project of reference needs to be reviewed so that the explanation and conclusions respond to the “Terms of reference”, especially number 4 (To offer the Commission an annual revision in the view of scientific evidence), seemingly in order to ensure that the Recommendation of 12 July 1999 is still adequate. This question is of special relevance because the EU is a universally valued reference.

Furthermore, and in line with the above, a better characterisation of the risks would facilitate the outside reader’s work, particularly if this person is not a scientist expert on the matter, as set out in item four. Taking into account that our administrations must respond to social concerns, elements related with risk perception and public communication cannot be formally absent from the reports by Committees like the SCENIHR.

In this sense, we consider that the conclusions on the acoustic neuroma should be explained in detail. The present wording may generate unnecessary alarm, given that there are serious methodological limitations, difficulties in assessing the real exposure to RF and biased information and selection in the few studies carried out.

I offer you the experience on the matter of the SCIENTIFIC ADVISORY COMMITTEE ON RADIOFREQUENCIES that I have the honour of presiding and which counts among its members with experts of longstanding experience in the field of risk communication and perception.