

## **5G: Great risk for EU health! Compelling evidence for eight distinct types of great harm caused by EMF exposures**

The document that follows was originally sent to many of the authorities of the European Union, in conjunction with other documents sent to the same people by a group of European scientists. It was in response to two documents that were, in turn, written by Mr. Ryan and Dr. Vinciūnas responding to a large group of European and other international scientists expressing great concern about the safety of 5G. I was asked by the leaders of the European group to write my own response to those two documents. Mr. Ryan made the statement that “There is consistent evidence presented by national and international bodies (International Commission on Non Ionising Radiation Protection - ICNIRP, Scientific Committee on Emerging and Newly Identified Health Risks SCENIHR) that exposure to electromagnetic fields does not represent a health risk, if it remains below the limits set by Council Recommendation 1999/519/EC1.” In fact, that is not either the ICNIRP or SCENIHR position – their position, and similar positions have been taken by the U.S. FCC, FDA and the National Cancer Institute, is that the evidence is inconsistent or conflicting and therefore no conclusions can be drawn. Some of them also state that there is no known mechanism by which effects can be produced. What is shown below is that there is a vast amount of evidence in the independent scientific literature that conflicts with both the conclusion about lack of demonstrated effects and the conclusion about mechanism.

The European Commission, according to the Ryan and Vinciūnas documents and the U.S. National Cancer Institute, according to their web site, are both depending on the SCENIHR 2015 document to make judgments about EMF effects. Consequently, the reliability of SCENIHR 2015 is an essential element in determining the reliability of both of their assessments.

The document that is presented below, differs from the document that was emailed to EU authorities in three different ways: 1. The original document was sent as an email with multiple attachments. In this document attachments are simply provided as citations. The current document is a stand-alone document. 2. Some material is inserted to discuss positions taken by the U.S. FCC, FDA and National Cancer Institute, so as to be particularly relevant to the U.S. situation. 3. In a few cases, some additional evidence is provided.

**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 & EU President Donald Tusk.

**cc:** Council of Europe

**From:** Martin L. Pall, Professor Emeritus, Washington State University

Both the earlier Ryan document and the more recent Arūnas document each fail to pay any attention to the extensive scientific literature that has been accumulated on non-thermal electromagnetic field (EMF) effects. The scientific consensus of independent

scientists based on information accumulated over the last 7 decades is just the opposite of what each of them states. I am copying into this document, at its end, a series of 8 extremely well-documented effects of such EMF exposure, together with a list of review articles, most of them being peer reviewed articles published in well-respected journals in the PubMed database, *that have each reviewed a body of evidence demonstrating the existence of each such effect.*

What are the effects produced by non-thermal exposures to microwave frequency EMFs, where we have an extensive scientific literature? Each of the following effects has been documented in from 9 to 34 reviews, listed at the end of this document.

1. Three types of cellular DNA attacks, producing single strand breaks in the cellular DNA, double strand breaks in cellular DNA and oxidized bases in cellular DNA. Each of these DNA changes have roles in cancer causation and in producing the most important mutational changes in humans and other animals: chromosomal breaks, rearrangements, deletions and duplications; single strand breaks in cellular DNA which can cause aberrant recombination events leading to copy number mutations; and oxidized bases leading to point mutations. When these occur in somatic cells, they can each have roles in causing cancer. When these occur in germ line cells (and they have been shown to occur in sperm following EMF exposures), they cause the three most important types of mutations in future generations, chromosomal mutations, copy number mutations and point mutations. (18 different reviews documenting these types of cellular DNA damage)
2. A wide variety of changes leading to lowered male fertility, lowered female fertility, increased spontaneous abortion, lowered levels of estrogen, progesterone and testosterone, lowered libido (14 reviews). Human sperm count has dropped to below 50% of what used to be considered normal throughout the technologically advanced countries of the world [1]. Reproductive rates have fallen below replacement levels in every technologically advanced country of the world, including every EU country, with a single exception outside the EU, with reproduction averaging in these countries about 73% of replacement levels according to 2015 or 2016 data. A study on mouse reproduction [2] showed that radio/microwave frequency EMF exposure at doses well within our current safety guidelines produced substantial dose-dependent decreases in reproduction within the first set of litters; further exposure produced dose-dependent complete or almost complete sterility that was found to be largely irreversible. When we have a technology that is universally present in these technologically advanced countries, that we know impacts reproduction, and reproduction has already dropped well below replacement levels, and we may be facing a catastrophic and irreversible decline in reproduction and there are more and more plans to expose us still further, don't you think that we should take note of the science? Mr. Ryan and Dr. Vinciusnas seem to be saying not at all. (Please note that the U.S. FCC and FDA also completely ignore this threat)
3. Neurological/neuropsychiatric effects (17 reviews). My own paper on this [3] and two earlier reviews cited in it found that there are whole series of repeatedly

found EMF effects which have also become extremely widespread complaints in our technologically advanced societies, namely: sleep disturbance/insomnia; fatigue/tiredness; headache; depression/depressive symptoms; lack of concentration/attention/cognitive dysfunction; dizziness/vertigo; memory changes; restlessness/tension/anxiety/stress/agitation; irritability. These findings are not just based on epidemiological findings but are also based on profound impacts of EMFs, at levels well within our safety guidelines, on brain structure and function and also on the mechanism of non-thermal EMF action discussed below. When we have these neuropsychiatric effects becoming more and more common in technologically advanced societies all over the world, and *we know each of these is caused EMF exposures*, shouldn't we take note of this relationship?

4. Apoptosis/cell death (12 reviews). The two most important consequences of large increases in apoptosis (programmed cell death) are in causation of the neurodegenerative diseases and lowered reproduction although there are others.
5. Oxidative stress/free radical damage (16 reviews). Oxidative stress has roles in all or almost all chronic diseases. It is reported to have essential roles in producing the reproductive effects and the attacks on cellular DNA and may also have roles in producing the neurological effects and some of the cancer-causing effects shown to be produced here by EMF exposures.
6. Widespread endocrine (that is hormonal) effects (9 reviews). The steroid hormone levels drop with EMF exposure, whereas other hormone levels increase with initial exposure. The neuroendocrine hormones and insulin levels often drop with prolonged EMF exposure, possibly due to endocrine exhaustion.
7. Increases in intracellular calcium ( $[Ca^{2+}]_i$ ) levels following EMF exposure (13 reviews). Calcium signaling also increases following EMF exposure.
8. Cancer causation (34 reviews). Brain cancer, salivary cancer, acoustic neuromas and two other types of cancer go up with cell phone use. People living near cell phone towers have increased cancer rates. Other types of EMFs are also implicated. Short wave radio, radio ham operators and people exposed to radar all are reported to have increased cancer incidence. Perhaps most telling, heavy-long term cell phone users have the highest incidence of brain cancer and have predominantly cancer increases on the ipsilateral side of the head (the side they use their cell phones), as opposed to the contralateral side. I have an in press paper [7], focused not on whether EMFs cause cancer but rather on *how* they can cause cancer. The paper shows that "downstream effects" of the main target of the EMFs in the cells of our bodies, can cause cancer in 15 different ways, including increases in cancer initiation, promotion and progression. Progression effects include both tissue invasion and metastasis. Each of these cancer causation effects are caused via mechanisms produced by downstream effects of the main non-thermal EMF mechanism, as discussed below.
9. Therapeutic effects of such EMFs. Such EMFs when focused on a specific region of the body where there is some dysfunction and when used at specific intensities, can have therapeutic effects. In my 2013 paper [4], I cited 12 different reviews where EMF stimulation of bone growth was used therapeutically. There are something like 4000 papers on various therapeutic effects. Strangely, the

telecommunications industry does not acknowledge these therapeutic effects, preferring rather to maintain the fiction that there are no non-thermal effects.

There is another set of reviews, 12 in this case, with each showing that pulsed EMFs are, in most cases, much more biologically active than are non-pulsed EMFs. This is particularly important because all wireless communication devices communicate via pulsations, making them potentially much more dangerous. It follows from this that if you wish to study the effects of Wi-Fi, cell phones, cordless phones, cell phone towers, smart meters or 5G, you had better study the real thing or at least something that pulses very much like the real thing. There are many studies that don't do this. Other factors that influence occurrence of non-thermal EMF effects include the frequency being used, the polarization of the EMFs and the cell type being studied [4,5,8-11]. Furthermore there are intensity “windows” that produce maximum biological effects, such that both lower and higher intensities produce much less effect [5,8,9]. These window effect studies clearly show that dose-response curves are both non-linear and non-monotone, such that it is difficult or impossible to predict effects based on intensity even when all other factors are the same. The role of each of these factors is completely ignored by ICNIRP, SCENIHR, the U.S. FCC, FDA and National Cancer Institute as well as by many other industry-friendly groups. When each of these organizations concludes that “results are inconsistent” they are comparing studies based on superficial similarities but not on these demonstrated causal factors. What is being observed, therefore, is genuine biological heterogeneity, not inconsistency. It has been known since the beginning of modern science in the 16<sup>th</sup> century that how you do your studies is important in determining what results are obtained. How is it possible that ICNIRP, SCENIHR, the U.S. FCC, FDA and National Cancer Institute have forgotten this important fact?

The primary literature studies demonstrating roles of pulsation, frequency, polarization, cell type and intensity windows in determining biological effects are entirely dependent on having genuine effects to study. None of these studies could have been done without an effect to study. Consequently, the claims that there are no well-documented EMF effects are nonsense, based not only on the eight extremely well-documented effects summarized above, but also on the entire literature demonstrating the role of pulsation, frequency, polarization, cell type and intensity windows.

Now I haven't said anything about how these non-thermal EMF effects are produced. I am taking much what immediately follows from an in press paper [11].

#### How Do EMF Exposures Lead to Non-Thermal Health Impacts?

The Pall, 2013 [4] study showed that in 24 different studies (there are now a total of 26; Pall, 2015 [5]), effects of low-intensity EMFs, both microwave frequency and also lower frequency EMFs, could be blocked by calcium channel blockers, drugs that are specific for blocking voltage-gated calcium channels (VGCCs). There were 5 different types of calcium channel blockers used in these studies each thought to be highly specific, each structurally distinct and each binding to a different site on the VGCCs. *In studies where multiple effects were studied, all studied effects were blocked or greatly lowered by*

*calcium channel blockers.* These studies show that EMFs produce diverse non-thermal effects via VGCC activation in many human and animal cells and even in plant cells where some similar calcium channels are involved [6]. Furthermore, many different effects shown to be produced in repeated studies by EMF exposures, including the effects discussed above, can each be produced by downstream effects of VGCC activation, via increased intracellular calcium  $[Ca^{2+}]_i$ , as discussed below.

Various EMFs act via VGCC activation, as shown by calcium channel blocker studies. These include microwave frequency EMFs, nanosecond pulse EMFs, intermediate frequency EMFs, extremely low frequency EMFs and even static electrical fields and static magnetic fields.

It is important to discuss why the VGCCs are so sensitive to activation by these low-intensity EMFs. Each of the VGCCs have a voltage sensor which is made up of 4 alpha helices, each designated as an S4 helix, in the plasma membrane. Each of these S4 helices has 5 positive charges on it, for a total of 20 positive charges making up the voltage sensor [5,8]. Each of these charges is within the lipid bilayer part of the plasma membrane. The electrical forces on the voltage sensor are extraordinarily high for three distinct reasons [5,8]. 1. The 20 charges on the voltage sensor make the forces on voltage sensor 20 times higher than the forces on a single charge. 2. Because these charges are within the lipid bilayer section of the membrane where the dielectric constant is about  $1/120^{\text{th}}$  of the dielectric constant of the aqueous parts of the cell, the law of physics called Coulomb's law, predicts that the forces will be approximately 120 times higher than the forces on charges in the aqueous parts of the cell. 3. Because the plasma membrane has a high electrical resistance whereas the aqueous parts of the cell are highly conductive, the electrical gradient across the plasma membrane is estimated to be concentrated about 3000-fold. The combination of these effects means that comparing the forces on the voltage sensor with the forces on singly charged groups in the aqueous parts of the cell, the forces on the voltage sensor are approximately  $20 \times 120 \times 3000 = 7.2$  million times higher [5,8]. The physics predicts, therefore, extraordinarily strong forces activating the VGCCs via the voltage sensor. It follows that the biology tells us that the VGCCs are the main target of the EMFs and the physics tells us why they are the main target. *Thus the physics and biology are pointing in exactly the same direction.*

We have, then, very strong arguments that the EMFs act directly on the voltage-sensor to activate the VGCCs. There are several other types of evidence, each providing important evidence supporting this view:

1. In a study published by Pilla [12], it was found that pulsed EMFs produced an "instantaneous" increase in calcium/calmodulin-dependent nitric oxide synthesis in cells in culture. What this study [12] showed was that following EMF exposure, the cells in culture, must have produced a large increase in  $[Ca^{2+}]_i$ , this in turn produced a large increase in nitric oxide synthesis, the nitric oxide diffused out of the cells and out of the aqueous medium above the cells into the gas phase, where the nitric oxide was detected by a nitric oxide electrode. This entire sequence occurred in less than 5 seconds. This eliminates almost any conceivable indirect effect, except possibly via plasma membrane

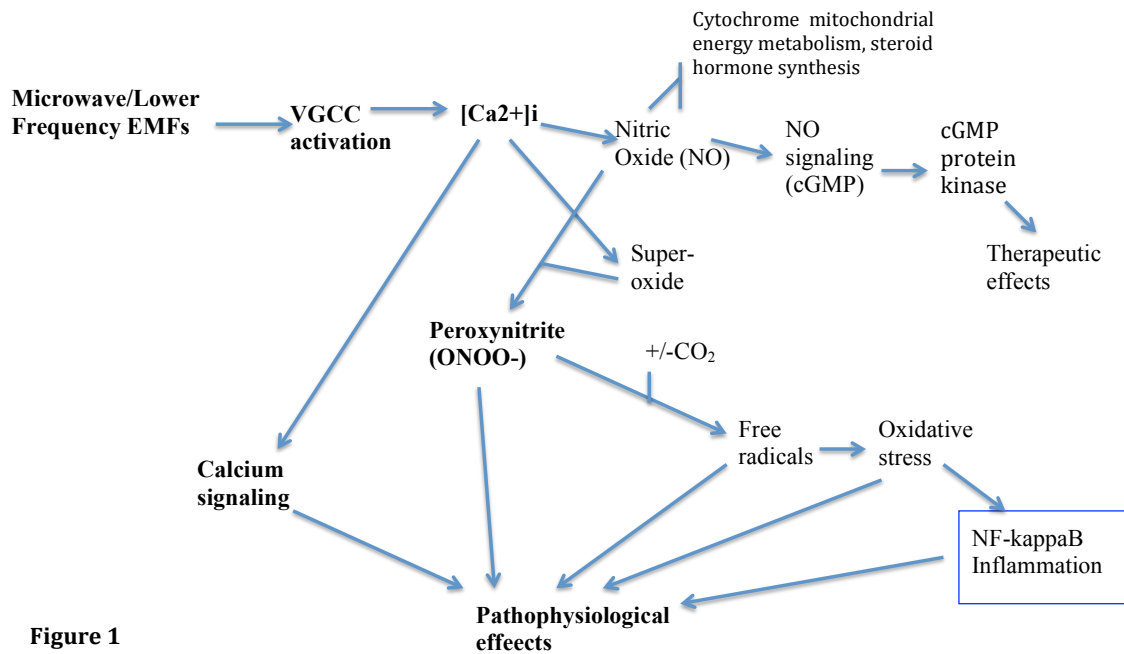
depolarization. Therefore, it is likely that the pulsed EMFs are acting directly on the voltage sensors of the VGCCs and possibly the voltage-gated sodium channels, to produce the  $[Ca^{2+}]_i$  increase.

2. There are also additional findings pointing to the voltage sensor as the direct target of the EMFs. In addition to the VGCCs, there are also voltage-gated sodium, potassium and chloride channels, with each of these having a voltage sensor similar to those found in the VGCCs. Lu et al [13] reported that voltage gated sodium channels, in addition to the VGCCs were activated by EMFs. Tabor et al [14] found that Mauthner cells, specialized neurons with special roles in triggering rapid escape mechanisms in fish, were almost instantaneously activated by electrical pulses, which acted via voltage-gated sodium channel activation to subsequently produce large  $[Ca^{2+}]_i$  increases. Zhang et al [15] reported that in addition to the VGCCs, potassium and chloride channels were each activated by EMFs, although these other voltage-gated ion channels had relatively modest roles compared with the VGCCs in producing biological effects. Each of these three studies [13-15] used specific blockers for these other voltage-gated ion channels to determine their roles. The Tabor et al [14] study also used genetic probing to determine the role of the voltage-gated sodium channels. Lu et al [13] also used whole cell patch clamp measurements to measure the rapid influx of both sodium and calcium into the cell via the voltage-gated channels following EMF exposure. Sodium influx, particularly in electrically active cells, act in the normal physiology to depolarize the plasma membrane, leading to VGCC activation such that the voltage-gated sodium channels may act primarily via indirect activation of the VGCCs. In summary then, we have evidence that in animal including human cells, seven distinct classes of voltage-gated ion channels are each activated by EMF exposures: From Ref. [4], four classes of voltage-gated ion channels were shown from calcium channel blocker studies, to be activated by EMFs, L-type, T-type, N-type and P/Q –type VGCCs. In this paragraph, we have evidence that three other channels are also activated, voltage-gated sodium channels, voltage-gated potassium channels and voltage-gated chloride channels. Furthermore, the plant studies strongly suggest that the so called TPC channels, which contain a similar voltage sensor, are activated in plants allowing calcium influx into plants to produce similar EMF-induced responses [6]. In summary, then we have evidence for eight different ion channels being activated by EMF exposure, four classes of VGCCs, one class each of voltage-gated sodium, potassium and chloride channels and also one class of plant channel, with each of these channels having a similar voltage-sensor regulating its opening. One can put those observations together with the powerful findings from the physics, that the electrical forces on the voltage-sensor are stunningly strong, something like 7.2 million times stronger than the forces on the singly charged groups in the aqueous phases of the cell. Now you have a stunningly powerful argument that the voltage sensor is the predominant direct target of the EMFs.

3. The most important study on this subject, was published by Tekieh et al [16]. It showed that microwave frequency EMFs directly activate the VGCCs in isolated membranes. A variety of microwave frequencies were used in these studies and each produced VGCC activation in a completely cell-free system. This study clearly shows

that the EMF activation of the VGCCs is direct and not due to some indirect regulatory effect.

You may be wondering why I am spending so much time and space going through each of these studies. The answer is that a trillion dollar (or trillion euro) set of industries, the telecommunications industry, has been putting out propaganda for over two decades, arguing that there cannot be a mechanism of action of these non-thermal EMFs to produce biological effects; and that these EMFs are too weak to do anything and that there only thermal effects are documented. It is essential to dot every **i** and cross every **t** with regard to the main mechanism of action of non-thermal effects. That is exactly what has been done here.



How Can the Diverse Effects of Such EMF Exposures Be Produced by VGCC Activation?

The mechanisms by which various effects can be generated by VGCC activation are outlined in Fig. 1. Going across the top of Fig. 1, it can be seen that increased intracellular calcium [Ca2+]i can increase nitric oxide (NO) synthesis, stimulating the NO signaling pathway (going to the right from top, center), to produce therapeutic effects. NO (very top) can also bind to cytochromes and inhibit their activity. NO binding to the terminal oxidase in the mitochondria inhibits energy metabolism and lowers, therefore, ATP. NO binding to cytochrome P450s, lower synthesis of steroid hormones, including estrogen, progesterone and testosterone. Most of the pathophysiological effects are produced by the peroxynitrite/free radical/oxidative stress pathway center to lower right (Fig. 1) and also by excessive calcium signaling pathway

(slightly left of center, Fig. 1). Some of the ways these are thought to produce various well-established EMF effects are outlined in Table 1.

**Table 1. How Eight Established Effects of Wi-Fi and Other EMFs Can Be Produced by VGCC Activation**

<b>EMF effect</b>	<b>Probable mechanism(s)</b>
Oxidative stress	Produced by elevated levels of peroxynitrite and the free radical breakdown products of peroxynitrite and its CO <sub>2</sub> adduct. Four studies of EMF exposure, cited in [4] showed that oxidative stress following exposure was associated with major elevation of 3-nitrotyrosine, a marker of peroxynitrite, thus confirming this interpretation. Two other studies each found 3-nitrotyrosine elevation, both following 35 GHz exposures [17,18].
Lowered male/female fertility, elevated spontaneous abortion, lowered libido	Both the lowered male fertility and lowered female fertility are associated with and presumably caused by the oxidative stress in the male and female reproductive organs. Spontaneous abortion is often caused by chromosomal mutations, so the germ line mutations may have a causal role. Lowered libido may be caused by lowered estrogen, progesterone and testosterone levels. It seems likely that these explanations may be oversimplified. One additional mechanism that may be important in producing lowered fertility is that VGCC activation and consequent high {Ca <sup>2+</sup> } <sub>i</sub> levels is known to have a key role in avoiding polyspermy. Consequently, if this is triggered before any fertilization of an egg has occurred, it may prevent any sperm from fertilizing and egg.
Neurological/ neuropsychiatric effects	Of all cells in the body, the neurons have the highest densities of VGCCs, due in part to the VGCC role and [Ca <sup>2+</sup> ] <sub>i</sub> role in the release of every neurotransmitter in the nervous system. Calcium signaling regulates synaptic structure and function in 5 different ways, each likely to be involved here. Oxidative stress and apoptosis are both thought to have important roles. Lowered sleep and increased fatigue are likely to involve lowered nocturnal melatonin and increased nocturnal norepinephrine.
Apoptosis	Apoptosis can be produced by excessive Ca <sup>2+</sup> levels in the mitochondria and by double strand breaks in cellular DNA; it seems likely that both of these mechanisms are involved following EMF exposure. A third mechanism for triggering apoptosis, endoplasmic reticulum stress (see bottom row in this Table), may also be involved.
Cellular DNA damage	Cellular DNA damage is produced by the free radical breakdown products of peroxynitrite directly attacking the



	DNA [7].
Changes in non-steroid hormone levels	The release of non-steroid hormones is produced by VGCC activation and $[Ca^{2+}]_i$ elevation. The immediate effects of EMF exposures is to increase hormone release and to raise, therefore, hormone levels. However many hormone systems become “exhausted” as a consequence of chronic EMF exposures. The mechanism of exhaustion is still uncertain, but it may involve oxidative stress and inflammation.
Lowered steroid hormone	Steroid hormones are synthesized through the action of cytochrome P450 enzymes; activity of these hormones is inhibited by binding of high levels of nitric oxide (NO) leading to lowered hormone synthesis.
Calcium overload	Produced by excessive activity of the VGCCs; secondary calcium overload is produced by oxidative stress activation of TRPV1, TRPM2 and possibly some other TRP receptors, opening the calcium channel of these receptors.
Heat shock protein induction	There is a large literature showing that excessive $[Ca^{2+}]_i$ induces very large increases in heat shock proteins. This is thought to be produced by complex calcium signaling changes involving the endoplasmic reticulum, mitochondria and the cytosol and also involving excessive $[Ca^{2+}]_i$ producing increasing protein misfolding [19-21]. It should be noted that some calcium is essential for proper protein folding in the endoplasmic reticulum such that only excessive calcium leads to misfolding and consequent endoplasmic reticulum stress.

Each of the seven established EMF effects, discussed above, can be generated through the mechanisms outlined in Fig. 1, as shown by Table 1. An eighth, heat shock protein induction can also be so explained (Table 1). Several other such effects, including EMF causation of cataracts, breakdown of the blood-brain barrier, lowered nocturnal melatonin as discussed earlier [5]. The primary mechanism for therapeutic effects was discussed in [4,22,23]. Each of these also shown to be generated via such VGCC downstream effects. Fifteen mechanisms for EMF cancer causation are described in ref [7]; these are far too complex to describe in this document so the reader is referred to ref [7].

*It can be seen, in summary, that we are far beyond the issue whether there are non-thermal EMF effects. Rather many researchers have identified many established effects of EMF exposure. The main direct targets of non-thermal EMF exposure, the VGCCs have also been identified and how these get activated by EMF exposure acting on the VGCC voltage-sensor has also been determined. And finally we have identified how a wide variety of these effects can be generated via downstream effects produced by such VGCC activation.*

Our current safety guidelines are based only on heating (thermal) effects. Heating is produced predominantly by forces on singly charged groups in the aqueous phases of the cell but the forces on the voltage sensor are approximately 7.2 million times higher. Therefore, our current safety guidelines are allowing us to be exposed to EMFs that are approximately 7.2 million times too strong. That 7.2 million figure is somewhat similar to the estimate given by the Bioinitiative Report and by the Building Biologists, based on completely different considerations.

It should be obvious, that non-thermal EMFs:

1. Attack our nervous systems including our brains leading to widespread neuropsychiatric effects and possibly many other effects. This nervous system attack is of great concern.
2. Attack our endocrine (that is hormonal) systems. In this context, the main things that make us functionally different from single celled creatures are our nervous system and our endocrine systems – even a simple planaria worm needs both of these. Thus the consequences of the disruption of these two regulatory systems is immense, such that it is a travesty to ignore these findings.
3. Produce oxidative stress and free radical damage, which have central roles in essentially all chronic diseases.
4. Attack the DNA of our cells, producing single strand and double strand breaks in cellular DNA and oxidized bases in our cellular DNA. These in turn produce both cancer and mutations in germ line cells with germ line mutations producing mutations impacting future generations.
5. Produce elevated levels of apoptosis (programmed cell death), events especially important in causing both neurodegenerative diseases and infertility.
6. Lower male and female fertility, lowered sex hormones, lowered libido, increased levels of spontaneous abortion and, as already stated, attacks on the DNA in sperm cells.
7. Produce excessive intracellular calcium  $[Ca^{2+}]_i$  and increased calcium signaling.
8. Act in the cells of our bodies via 15 different mechanisms to cause cancer.

By attacking all of these important systems in the body, EMFs attack everything we care about including our health (in many ways), our reproductive systems, the integrity of our genomes and our ability to produce healthy offspring.

I believe there are 75 different reviews listed below, with each documenting the existence of one or more of these various non-thermal EMF effects. What, then, do the two organization reports that the EU authorities and U.S. authorities rely upon, ICNIRP and SCENIHR 2015, have to say about these independent reviews. The answer is absolutely nothing! Neither one of them ever looks at any of these independent reviews.

### The Importance of the SCENIHR 2015 Document

One thing that I think we can all agree upon, is that the SCENIHR 2015 [24] document is an important document. The reason for its importance is that previous industry-friendly documents, and there have been many of them, have only reviewed very limited amounts

of the literature on EMF effects. Consequently, all of these other documents are open to the criticism that they have cherry picked what little data they have chosen to discuss. SCENIHR 2015 [24] has a reference list of almost 48 pages in length, going from page 233 to 280. So it appears that SCENIHR 2015 may have done a much more thorough and defensible review of the literature. The question that is being raised here is whether this is an accurate characterization of SCENIHR 2015 [24] or not. The fact that SCENIHR 2015 fails to discuss any of the many independent reviews which disagree with them, even those that fall into the 2009 through 2013 period that SCENIHR claims to have thoroughly considered, is not a good sign, but what about the primary literature that falls into their selected time frame? I will use two other studies as sources to try to answer that question.

Panagopoulos et al [25] showed that whereas 46 out of 48 studies on genuine cell phone radiation showed health-related effects, the majority of studies on simulated cell phones reported no statistically significant effects. Of those 48 genuine cell phone studies, 18 fell into the time frame (Jan. 2009 through Dec. 2013) reviewed in SCENIHR, 2015. How many of these 18 were reviewed and cited in SCENIHR 2015? The answer is zero, as is easy to determine by looking them up in the alphabetized SCENIHR citation list! The failure of SCENIHR to discuss any of these papers was also confirmed by searching under the senior author's last name.

Of the 23 studies on genuine Wi-Fi [11], seven of them (Atasoy et al [26]; Avendaño et al [27]; Aynali et al [28]; Maganioti et al [29]; Oni et al [30]; Özorak et al [31]; Papageorgiu et al [32]) fell into the SCENIHR 2015 time-period. Of these only 3 (Avendaño et al [27] Özorak et al [31]; Papageorgiu et al [32]) were listed in the SCENIHR citation list. Searching the SCENIHR 2015 document, the following information was found about the actual discussion of these three papers: There was, surprisingly, no discussion of Avendaño et al [27]. The discussion of Özorak et al [31] included the finding of oxidative stress but failed to report the findings on the structure of the testis, findings probably caused by oxidative stress. The SCENIHR 2015 discussion of Papageorgiu et al [32] states that "The only statistically significant effect seen from the P300 amplitude was one for exposure \* gender interaction in the inhibition condition (at 15 out of 30 electrodes)." This is false, however, leaving out the following from Papageorgiu et al, 2011 "P300 amplitude values at 18 electrodes were found to be significantly lower in the response inhibition condition than in the response initiation and baseline conditions." It follows that SCENIHR 2015 ignored all of the relevant data on genuine cell phone radiation found in Panagopoulos et al [25] and 5 out of 7 relevant studies on genuine Wi-Fi while seriously understating the effects found in the two Wi-Fi studies which were discussed.

The important roles of pulsation, window effects, frequency, cell type and polarization in determining biological activity of EMFs were discussed on p. 4, where it was noted that SCENIHR fails to pay attention to any of these roles. That failure shows up in many places in the document. In Tables 5, 6, 7, 8, 9, 10, 11, 12, 13 and 14 of SCENIHR 2015 [[24], the discussion of each table centers on how many studies found apparent significant effects and how many did not. But these numbers are irrelevant to the issue of

whether there are effects or not. In fact, one can argue that the industry, knowing about the roles of each of these factors, could fund any number of studies designed to give apparent negative results just by manipulating these factors to minimize responses and by only studying tiny numbers of individuals to produce low statistical power. This approach closely describes the approach used in seven studies of what were claimed to be genuine Wi-Fi studies that were described by Foster and Moulder [33] in Table 4 of their paper. Those seven studies were shown [11] to all have used an EMF that was not genuine Wi-Fi, despite claims to the contrary. They all used one of two types of reverberation exposure chamber for their rodent exposures, with each type of chamber greatly lowering the polarization of the EMF [11] and also generating some level of destructive interference from variable path lengths produced by the reverberations. Each of these changes from genuine Wi-Fi are predicted to lower effects. Foster and Moulder [33] concluded that there was no effect in any of these studies. However tiny numbers of rodents were studied, typically between 3 and 15 in each class, such that these studies have very low statistical power to conclude anything substantive. It is not possible to conclude no effect even with large studies, only that there is no statistically significant evidence of an effect. With tiny numbers, a claim of no effect is complete nonsense. Were these seven studies designed to fail? I don't think we can say for certain but they certainly look as if they may have been. They also raise the serious question about whether the industry may be corrupting the science, by using their knowledge of the roles of pulsation, window effects, frequency, cell type and polarization.

In any case, the only way to show that there are inconsistencies or conflicts in the EMF literature is to carefully repeat studies finding such effects, not to flood the literature with studies done under other conditions. The logic used throughout SCENIHR 2015 just counting numbers of studies, regardless of how accurately these are assessed, is deeply flawed.

An additional widespread flaw in SCENIHR 2015 [24] comes from the use of the term “no effect” or “no effects.” As shown in the second paragraph, above, these are never legitimate inferences, but they are inferred well over 200 times in the SCENIHR 2015 [24] document.

Before summarizing the SCENIHR 2015 document, I will discuss a single particularly important issue. At the end of Table 5 there is a claim that a 2013 study by Speit et al [34] was unable to replicate the findings of a 2008 study published by Schwarz et al [35]. In Table 5 they state further that Speit et al found “No effect on DNA integrity (MN) and DNA migration (comet); Repetition study of Schwarz et al, 2008.” What is called loss of DNA integrity here, measured by formation of micronuclei (MN), is caused by the formation of double strand breaks in cellular DNA. The comet assay measures single strand breaks in cellular DNA. Schwarz et al [35] found strong evidence that there were large increases in both single strand and double strand breaks in cellular DNA, but SCENIHR claims that Speit et al [34] was unable to repeat the earlier study. Elsewhere (p. 89, bottom) SCENIHR states that “By using the same exposure system and the same experimental protocols as the authors of the original study, they failed to confirm the results. They did not find any explanation for these conflicting results (Speit

et al, 2013).” A careful examination of both [34] and [35] finds the following: 1. Speit et al [34] used a cell line, HL-60; Schwarz et al [35] studied human fibroblasts. This is a big difference because, as we have already said, different cell types behave differently. 2. Speit used 1800 MHz radiation; Schwarz used 1950 MHz radiation (the frequency of UMTS, also called 3G). Again, we have a potentially important difference because effects are influenced by the frequency used. 3. Speit used a continuous wave EMF; Schwarz used a highly pulsed EMF, with high levels of both KHz and MHz pulsations to mimic the pulsation pattern of 3G cell phones. This is expected to be a very large difference between the two studies. 4. Speit used an exposure chamber similar to the reverberation exposure chambers discussed above; Schwarz did not use any exposure chamber. This could be another very large difference between the two studies. 5. So where did the claim come from that Speit was trying to repeat the Schwarz study? Speit says in their paper that they were trying to repeat another study (not Schwarz) that was described in a report but was never published. 6. Speit does not even cite the Schwarz paper, so obviously they did not intend to repeat Schwarz. We have then two multifaceted falsehoods that are SCENIHR’s not Speit’s. They break down to 5 or 6 falsehoods. Each of these are obvious, such that even the most superficial reading of the two papers would tell any researcher that these are falsehoods and they were constructed by SCENIHR.

As you might guess, there is a major story behind all of this. The very low intensity exposure used in the Schwarz et al [35] study produced large numbers of DNA breaks, larger than that produced by 1600 chest X-rays. From this comparison, it seems clear that non-ionizing radiation similar to 3G radiation can be much more dangerous to our DNA than is a very high-powered X-ray machine. When this was found the industry went into attack mode, attacking the two Professors who collaborated in this study, Prof. Franz Adlkofer in Germany and Hugo Rüdinger in Austria. The first couple of years of these attacks have been described in some detail on pp 117-131 in Dr. Devra Davis’ book Disconnect [36]. Before the SCENIHR 2015 documented was drafted, it was clear that the publishers who had published Adlkofer’s and Rüdinger’s work, had long since rejected the industry propagandist claims. In addition, Adlkofer had won a lawsuit in the German courts against his main accuser. He has since won a second such lawsuit. The last paragraph on p. 89 in SCENIHR 2015 is word for word industry propagandist. What is clear is that SCENIHR is wittingly or unwittingly serving as a propagandist for the industry and that SCENIHR has no difficulty in putting forth obvious falsehoods.

In addition to the completely disgraceful behavior of SCENIHR with regard to this Speit/Schwarz issue we have in addition the following: SCENIHR 2015 systematically avoids discussing the very large numbers of reviews that reject one of more or their positions, reviews based on over 10,000 primary literature citations that also reject one or more of their positions. It systematically avoided each of the genuine cell phone studies cited in Panagopoulos et al [25] that fell into the 2009 to 2013 time-frame presumably covered by SCENIHR 2015. It not quite so systematically avoided or misrepresented the seven genuine Wi-Fi that fell into that time frame. It has over 200 claims of “no effect” or “no effects,” none of which are accurate – what should be there is a statement of lack of statistically significant evidence of an effect. And then it plays numbers games with

groups of dissimilar studies where there should be no assumption that results should be similar. There can be no sustainable claim that SCENIHR is a reliable source of information about EMF effects, or lack of effects.

Before leaving completely the Schwarz et al [35] article, it raises a very important and challenging question. How can pulsed microwave frequency EMFs, at very low intensity produce much more DNA damage than a comparable amount of energy from an X-ray machine? This is, of course, the finding that caused the industry to go berserk over the Schwarz et al [35] article. I think the answer comes from Fig. 1 and also from the finding that both microwave EMFs (and lower frequency radiation) and ionizing radiation can both act to produce cellular DNA damage via free radicals. The EMFs act, as shown in Fig. 1 via three amplification steps to produce the free radicals. The first step is that for each second the VGCC channel is open, about a million calcium ions flow into the cell per second. Then the increased  $[Ca^{2+}]_i$  acts catalytically to increase the levels of both NO and superoxide, a second level of amplification. NO and superoxide react with each other to form peroxynitrite in a reaction whose rate is proportional to the concentration of NO times the concentration of superoxide, a third level of amplification. There are various factors that influence how active these steps will be, but the notion that microwave frequency EMFs can be much more dangerous a comparable amount of ionizing radiation should be taken very seriously.

Lastly, before going on to 5G, there is one other thing I want to state here. In 2005, Dr. Jared Diamond published a book [37] entitled “Collapse: How Societies Choose to Fail or Succeed.” In it he documents how each society that “chose to fail,” chose paths that had some short-term gains but also had much more severe longer-term consequences. This is exactly what we have been doing with the EMFs, except that the consequences are much more severe than the collapse of one society – here all of the advanced technology societies on earth are at great risk.

### How Does This Apply to 5G?

We have already discussed two issues that are essential to understanding 5G. One is that pulsed EMFs are, in most cases, much more biologically active than are non-pulsed (often called continuous wave) EMFs. A second is that the EMFs act by putting forces on the voltage sensor of the VGCCs, opening these calcium channels and allowing excessive calcium ions to flow into the cell; that voltage sensor is extraordinarily sensitive to those electrical forces, such that the safety guidelines are allowing us to be exposed to EMFs that are something like 7.2 million times too high.

The reason that the industry has decided to go to the extremely high frequencies of 5G is that with such extremely high frequencies, it is possible to carry much more information via much more pulsation than it is possible to carry with lower frequencies even in the microwave range. We can be assured, therefore, that 5G will involve vastly more pulsation than do EMFs that we are currently exposed to. It follows from that, that any biological safety test of 5G must use the very rapid pulsations including whatever very short term spikes may be present, that are to be present in genuine 5G. There is an

additional process that is planned to be used in 5G: phased arrays ([https://en.wikipedia.org/wiki/Phased\\_array](https://en.wikipedia.org/wiki/Phased_array)). Here multiple antenna elements act together to produce highly pulsed fields which are designed for 5G, to produce increased penetration. 5G will entail particularly powerful pulsations to be used, which may, therefore, be particularly hazardous.

The only data we have, to my knowledge, used *non-pulsed EMFs in the frequency range of 5G, not genuine 5G*. Any such data tells us almost nothing useful about 5G. I take it that from their statements, that both Mr. Ryan and Dr. Vinciūnas are ready to put out 10s of millions of 5G antennae to afflict every single person in the EU with 5G radiation without even a single biological test of safety of genuine 5G. (Note: the FCC has taken an identical position). In a world where shocking behavior has become less and less shocking, I consider their views to be genuinely shocking. The U.S. may be in just as bad a situation as is Europe or perhaps, even worse. I would have hoped that the Europeans, who think of themselves as being much more thoughtful than Americans, would have been genuinely more thoughtful.

Why does 5G need such high numbers of antennae? It is because the 5G radiation is much more absorbed as it enters various materials. The approach is to use many more antennae with one found every few houses, such that 5G can sufficiently penetrate local walls. Such absorption usually involves the interaction with electrically charged groups, such that such absorption is likely to involve placing forces on electrically charged groups. Because such forces are the way in which EMFs activate the VGCCs, it seems highly likely, therefore, that 5G radiation will be particularly active in such activation.

Now what the telecommunications industry argues is that 5G radiation will be mostly absorbed in the outer 1 or 2 mm of the body, such that they claim that we don't have to worry about the effects. There is some truth to that, but there are also some caveats that make any conclusions made from that, much more suspect. In any case, these surface effects of 5G will have especially strongly impact organisms with much higher surface to volume ratios. Consequently, I predict that many organisms will be much more impacted than we will. This includes insects and other arthropods, birds and small mammals and amphibia. It includes plants and even large trees, because trees have leaves and reproductive organs that are highly exposed. I predict there will be major ecological disasters as a consequence of 5G. This will include vast conflagrations because EMF exposures make plants much more flammable.

But let's get back to humans. The industry has also made claims that more conventional microwave frequency EMFs are limited in effect to the outer 1 cm of the body. We know that is not true, however because of the effects on the human brain, heart and hormone systems. Perhaps the most important two studies demonstrating effects deep within the body are the studies of Professor Hässig and his colleagues in Switzerland on cataract formation in calves [38,39]. These two studies clearly show that when pregnant cows are grazing near mobile phone base stations (sometimes called cell phone towers), the calves are born with very greatly increased incidences of cataracts. It follows from these findings that even though the developing fetuses are very deep in the body of the mother

and should be highly protected from the EMF exposures, they are not so protected. And because the EMF safety guidelines in Switzerland are 100 times more stringent than are the safety guidelines in most of the rest of Europe, the more general safety guidelines allow greatly excessive exposures. The claims of industry that microwave frequency EMFs only act in the outer centimeter of the body are clearly false.

How then can both conventional microwave frequency EMFs and 5G radiation act deeply within the body? You may correctly observe that the electrical effects of the EMFs activate the voltage sensor and that the direct electrical forces are rapidly attenuated in the body. So how can we get deep effects? I think the answer is that the magnetic parts of the EMFs have been known for decades to penetrate much more deeply than do the electrical parts. The magnetic fields put forces on mobile electrically charged groups dissolved in the aqueous phases of the body and small individual movements of the charged groups can regenerate electric fields that are essentially identical to the electric fields of the original EMFs, carrying the same frequency and same pulsation pattern, although with lower intensity. An example of this is given in the Lu and Ueno [40] study. Because the voltage sensor is so stunningly sensitive to electrical forces and part of the reason for that is the very high level of amplification of the electrical field across the plasma membrane, we have an almost perfect way in which to produce EMF effects deeply within our bodies.

This brings us back to the earlier point. The only way to do 5G safety testing is to do genuine 5G biological safety testing. I have published on how this can be done relatively easily at relatively low costs in any comparison with the gigantic risks that will be taken if we fail to do those tests. Those tests must be done by organizations completely independent of industry and that leaves out both ICNIRP and SCENIHR and a lot of other organizations.

Dr. Vinciūnas' last full paragraph reads as follows: "The recourse to the EU's precautionary principle to stop distribution of 5G products appears too drastic a measure. We need first to see how this technology will be applied and how the scientific evidence will evolve. Please be assured that the Commission will keep abreast of the scientific evidence in view of safeguarding the health of European citizens at the highest level possible and in line with its mandate."

Article 191 defines the **Precautionary Principle** as follows:

"According to the European Commission the precautionary principle may be invoked when a phenomenon, **product or process may have a dangerous effect**, identified by a **scientific and objective evaluation, if this evaluation does not allow the risk to be determined with sufficient certainty**.

Recourse to the principle belongs in the general framework of **risk analysis** (which, besides risk evaluation, includes risk management and risk communication), and more particularly in the context of **risk management** which corresponds to the decision-making phase.



The Commission stresses that the precautionary principle may only be invoked in the event of a potential risk and that it can never justify arbitrary decisions.

The precautionary principle may only be invoked when the **three preliminary conditions** are met:

identification of potentially adverse effects;  
evaluation of the scientific data available;  
the extent of scientific uncertainty.”

We know that there is a massive literature, providing a high level of scientific certainty, for each of these pathophysiological effects caused by non-thermal EMF exposures. This is shown in from 9 to 34 times reviews on each specific effect, with each listed review providing a substantial body of evidence on the effect existence.

1. Attack our nervous systems including our brains leading to widespread neuropsychiatric effects and possibly many other effects. This nervous system attack is of great concern.
2. Attack our endocrine (that is hormonal) systems. In this context, the main things that make us functionally different from single celled creatures are our nervous system and our endocrine systems – even a simple planaria worm needs both of these. Thus the consequences of the disruption of these two regulatory systems is immense, such that it is a travesty to ignore these findings.
3. Produce oxidative stress and free radical damage, which have central roles in essentially all chronic diseases.
4. Attack the DNA of our cells, producing single strand and double strand breaks in cellular DNA and oxidized bases in our cellular DNA. These in turn produce both cancer and mutations in germ line cells which produce mutations in future generations.
5. Produce elevated levels of apoptosis (programmed cell death), events especially important in causing both neurodegenerative diseases and infertility.
6. Lowers male and female fertility, lowers sex hormones, lowers libido and increases levels of spontaneous abortion and, as already stated, attacks on the DNA in sperm cells.
7. Produces excessive intracellular calcium  $[Ca^{2+}]_i$  and increased calcium signaling.
8. Attacks the cells of our bodies to cause cancer. Such attacks are thought to act via 15 different mechanisms during cancer causation.

Of course, the Commission has done nothing to protect European citizens from any of these very serious health hazards.

The question now is what about 5G? Here we have strong suspicions of similar or more severe risk than those listed immediately above but we have no biological safety testing of genuine 5G radiation. Therefore, we have no risk analysis or risk management because we have no risk assessment whatsoever on 5G. So here we have Dr. Vinciūnas arguing that the request for precautionary principle application is premature. But it is not

the request for the use of the precautionary principle that is premature, it is the Commission's claim that it has done the required risk analysis and risk assessment. This is the bizarre world that we live in.

Let me close, as follows. There have been certain points in our history where people have stood up to strong destructive forces against what often appeared to be insurmountable odds. Those people are THE most honored people in our history. The people who failed to do so are among the most despised people in our history. I am not at all sure we will have historians to record us 100 years from now or even 30 years from now, given the direction in which we are heading. But if we do, rest assured that these are the standards by which you will be judged.

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Thank you for your consideration. Martin L. Pall, Professor Emeritus  
(US) 503-232-3883; martin\_pall@wsu.edu

**Reviews each showing important health-related non-thermal effects of microwave frequency electromagnetic fields (EMFs).**

This document was prepared by Dr. Martin L. Pall, Professor Emeritus of Biochemistry and Basic Medical Sciences, Washington State University. [martin\\_pall@wsu.edu](mailto:martin_pall@wsu.edu)  
BA degree in Physics, Phi Beta Kappa, with honors, Johns Hopkins University; PhD in Biochemistry & Genetics, Caltech.

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18. Pall ML. 2018 How cancer can be caused by microwave frequency electromagnetic field (EMF) exposures: EMF activation of voltage-gated calcium channels (VGCCs) can cause cancer including tumor promotion, tissue invasion and metastasis via 15 mechanisms. In press: *Mobile Communications and Public Health*, Marko Markov, Ed., CRC in press 2018.

**Lowered fertility, including changes in testis structure, lowered sperm count and sperm quality, lowered female fertility, lowered estrogen, progesterone and testosterone levels (that is sex hormone levels), increased spontaneous abortion incidence:**

1. Glaser ZR, PhD. 1971 Naval Medical Research Institute Research Report, June 1971. Bibliography of Reported Biological Phenomena (“Effects”) and Clinical Manifestations Attributed to Microwave and Radio-Frequency Radiation. Report No. 2 Revised. [https://scholar.google.com/scholar?q=Glaser+naval+medical+microwave+radio-frequency+1972&btnG=&hl=en&as\\_sdt=0%2C38](https://scholar.google.com/scholar?q=Glaser+naval+medical+microwave+radio-frequency+1972&btnG=&hl=en&as_sdt=0%2C38) (Accessed Sept. 9, 2017)
2. Tolgskaya MS, Gordon ZV. 1973. Pathological Effects of Radio Waves, Translated from Russian by B Haigh. Consultants Bureau, New York/London, 146 pages.
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13. K Sri N. 2015 Mobile phone radiation: physiological & pathophysiological considerations. *Indian J Physiol Pharmacol* 59:125-135.
14. Houston BJ, Nixon B, King BV, De Iuliis GN, Aitken RJ. 2016 The effects of radiofrequency electromagnetic radiation on sperm function. *Reproduction* 152:R263-R276

### **Neurological/neuropsychiatric effects:**

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[https://scholar.google.com/scholar?q=Glaser+naval+medical+microwave+radio-frequency+1972&btnG=&hl=en&as\\_sdt=0%2C38](https://scholar.google.com/scholar?q=Glaser+naval+medical+microwave+radio-frequency+1972&btnG=&hl=en&as_sdt=0%2C38) (Accessed Sept. 9, 2017)
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**Apoptosis/cell death** (an important process in production of neurodegenerative diseases that is also important in producing infertility responses):

1. Glaser ZR, PhD. 1971 Naval Medical Research Institute Research Report, June 1971. Bibliography of Reported Biological Phenomena (“Effects”) and Clinical Manifestations Attributed to Microwave and Radio-Frequency Radiation. Report No. 2 Revised. [https://scholar.google.com/scholar?q=Glaser+naval+medical+microwave+radio-frequency+1972&btnG=&hl=en&as\\_sdt=0%2C38](https://scholar.google.com/scholar?q=Glaser+naval+medical+microwave+radio-frequency+1972&btnG=&hl=en&as_sdt=0%2C38) (Accessed Sept. 9, 2017)
2. Tolgskaya MS, Gordon ZV. 1973. Pathological Effects of Radio Waves, Translated from Russian by B Haigh. Consultants Bureau, New York/London, 146 pages.

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11. Batista Napotnik T, Reberšek M, Vernier PT, Mali B, Miklavčič D. 2016 Effects of high voltage nanosecond electric pulses on eukaryotic cells (in vitro): A systematic review. *Bioelectrochemistry.* 2016 Aug;110:1-12. doi: 10.1016/j.bioelechem.2016.02.011.
12. Asghari A, Khaki AA, Rajabzadeh A, Khaki A. 2016 A review on Electromagnetic fields (EMFs) and the reproductive system. *Electron Physician.* 2016 Jul 25;8(7):2655-2662. doi: 10.19082/2655.

**Oxidative stress/free radical damage** (important mechanisms involved in almost all chronic diseases):

1. Raines, J. K. 1981. Electromagnetic Field Interactions with the Human Body: Observed Effects and Theories. Greenbelt, Maryland: National Aeronautics and Space Administration 1981; 116 p.
2. Hardell, L., Sage, C. 2008. Biological effects from electromagnetic field exposure and public exposure standards. *Biomed. Pharmacother.* 62, 104-109.
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13. Yakymenko I, Tsybulin O, Sidorik E, Henshel D, Kyrylenko O, Kysylenko S. 2015 Oxidative mechanisms of biological activity of low-intensity radiofrequency radiation. *Electromagnetic Biol Med: Early Online* 1-16. ISSN: 1536-8378.
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16. Wang H, Zhang X. 2017 Magnetic fields and reactive oxygen species. *Int J Mol Sci.* 2017 Oct 18;18(10). pii: E2175. doi: 10.3390/ijms18102175.

### **Endocrine, that is hormonal effects:**

1. Glaser ZR, PhD. 1971 Naval Medical Research Institute Research Report, June 1971. Bibliography of Reported Biological Phenomena (“Effects”) and Clinical Manifestations Attributed to Microwave and Radio-Frequency Radiation. Report No. 2 Revised.  
[https://scholar.google.com/scholar?q=Glaser+naval+medical+microwave+radio-frequency+1972&btnG=&hl=en&as\\_sdt=0%2C38](https://scholar.google.com/scholar?q=Glaser+naval+medical+microwave+radio-frequency+1972&btnG=&hl=en&as_sdt=0%2C38) (Accessed Sept. 9, 2017)
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9. Asghari A, Khaki AA, Rajabzadeh A, Khaki A. 2016 A review on Electromagnetic fields (EMFs) and the reproductive system. *Electron Physician.* 2016 Jul 25;8(7):2655-2662. doi: 10.19082/2655.

**Increased intracellular calcium:** intracellular calcium is maintained at very low levels (typically about  $2 \times 10^{-9}$  M) except for brief increases used to produce regulatory responses, such that sustained elevation of intracellular calcium levels produces many pathophysiological (that is disease-causing) responses).

1. Walleczek, J. 1992. Electromagnetic field effects on cells of the immune system: the role of calcium signaling. *FASEB J.* 6, 3177-3185.
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**Pulsed EMFs are, in most cases much more biologically active than are non-pulsed EMFs.** This is important because all wireless communication devices communicate via pulsations and because the “smarter” the devices are, the more they pulse because the pulsations convey the information. What should be obvious is that you cannot study such pulsation roles if there were no biological effects produced by such EMFs. *The pulsation studies alone tell us that there are many such EMF effects.*

1. Osipov YuA, 1965 [Labor hygiene and the effect of radiofrequency electromagnetic fields on workers]. Leningrad Meditsina Publishing House, 220 pp.
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### **Cancer causation by EMF exposures:**

1. Dwyer, M. J., Leeper, D. B. 1978 A Current Literature Report on the Carcinogenic Properties of Ionizing and Nonionizing Radiation. DHEW Publication (NIOSH) 78-134, March 1978.
2. Marino AA, Morris DH. 1985 Chronic electromagnetic stressors in the environment. A risk factor in human cancer. *J environ sci health C3*:189-219.
3. Adey WR. 1988 Cell membranes: the electromagnetic environment and cancer promotion. *Neurochem Res*.13:671-677.
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5. Goldsmith JR. 1995 Epidemiological evidence of radiofrequency radiation (microwave) effects on health in military, broadcasting and occupational settings. *Int J Occup Environ Health* 1:47-57.
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12. Desai NR, Kesari KK, Agarwal A. 2009 Pathophysiology of cell phone radiation: oxidative stress and carcinogenesis with focus on the male reproductive system. *Reproduct Biol Endocrinol* 7:114.
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16. Giuliani L, Soffriti M (Eds). 2010 NON-THERMAL EFFECTS AND MECHANISMS OF INTERACTION BETWEEN ELECTROMAGNETIC FIELDS AND LIVING MATTER, RAMAZZINI INSTITUTE EUR. J. ONCOL. LIBRARY Volume 5, National Institute for the Study and Control of Cancer and Environmental Diseases "Bernardino Ramazzini" Bologna, Italy 2010, 400 page monograph.
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24. Davis DL, Kesari S, Soskolne CL, Miller AB, Stein Y. 2013 Swedish review strengthens grounds for concluding that radiation from cellular and cordless phones is a probable human carcinogen. *Pathophysiology* 20:123-129.

25. Morgan LL, Miller AB, Sasco A, Davis DL. 2015 Mobile phone radiation causes brain tumors and should be classified as a probable human carcinogen (2A). *Int J Oncol* 46(5): 1865-1871.
26. Mahdavi M, Yekta R, Tackallou SH. 2015 Positive correlation between ELF and RF electromagnetic fields on cancer risk. *J Paramed Sci* 6(3), ISSN 2008-4978.
27. Carlberg M, Hardell L. 2017 Evaluation of Mobile Phone and Cordless Phone Use and Glioma Risk Using the Bradford Hill Viewpoints from 1965 on Association or Causation. *BioMed Res Int* 2017, Article ID 9218486, <https://doi.org/10.1155/2017/9218486>
28. Bortkiewicz A, Gadzicka E, Szymczak W. 2017 Mobile phone use and risk for intracranial tumors and salivary gland tumors - A meta-analysis. *Int J Occup Med Environ Health* 30:27-43.
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34. Pall ML. 2018 How cancer can be caused by microwave frequency electromagnetic field (EMF) exposures: EMF activation of voltage-gated calcium channels (VGCCs) can cause cancer including tumor promotion, tissue invasion and metastasis via 15 mechanisms. In press: *Mobile Communications and Public Health*, Marko Markov, Ed., CRC in press 2018.

Each of these reviews, typically cite from 5 to over 100 primary literature citations, each showing that non-thermal EMF exposures produce the effect under which they are listed. It follows from this, that there are not only a dozen or more reviews documenting each of these effects, but there is also a massive primary literature documenting these effects as well. It follows from this that the ICNIRP, FCC and International Safety Guidelines, which are entirely based only on thermal effects are inadequate and there have been petitions and other statements of international groups of scientists expressing great concern about this. *It follows that th ICNIRP, FCC and International safety guidelines are completely unscientific and cannot be relied upon to protect our safety.*