

5G and Cell Tower Radiation: Caught in a Regulatory Gap

There is No U.S. Federal Agency Ensuring Cell Tower Wireless Safety

By Environmental Health Trust

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There is no U.S. government agency with oversight for cell tower radiation health effects:

no research reviews, no reports, no environmental monitoring, no risk mitigation and no post market health surveillance for the daily, full body radio-frequency (RF) radiation exposure from cell towers. Cell tower radiation exemplifies the concept of a regulatory gap.

The FDA

"The FDA does not regulate cell towers or cell tower radiation. Therefore, the FDA has no studies or information on cell towers to provide in response to your questions." - Ellen Flannery, Director, FDA Policy Center for Devices and Radiological Health to a California mother with a cell tower on her street who asked the FDA about safety, July 11, 2022

The National Cancer Institute (NCI)

"As a Federal research agency, the NCI is not involved in the regulation of radio frequency telecommunications infrastructure and devices, nor do we make recommendations for policies related to this technology"

-National Cancer Institute letter to Denise Ricciardi, member of the New Hampshire State Commission on 5G, July 30, 2020

The American Cancer Society (ACS)

The ACS does "not have any official position or statement on whether or not radiofrequency radiation from cell phones, cell phones towers, or other sources is a cause of

cancer." -American Cancer Society Website

The Environmental Protection Agency (EPA)

"EPA's last review was in the 1984 document <u>Biological Effects of Radiofrequency Radiation</u>. The EPA does not currently have a funded mandate for radiofrequency matters." <u>-Lee Ann B. Veal Director, EPA Radiation Protection Division Office of Radiation and Indoor Air, July 8, 2020 Letter to Theodora Scarato</u>

The Center for Disease Control (CDC)

Fact: There are no scientific reports by the CDC on cell tower radiation safety, nor does the agency have staff with expertise monitoring the science and evaluating risk. Public information requests found that several CDC website pages on radio frequency were found to be drafted with a wireless industry consultant.

The Department of the Interior

"The electromagnetic radiation standards used by the Federal Communications Commission (FCC) continue to be based on thermal heating, a criterion now nearly 30 years out of date and inapplicable today." <u>– U.S. Department of Interior Letter to FCC, 2014</u>

The World Health Organization

Fact: The World Health Organization (WHO) EMF Project has not reviewed the science since 1993. The WHO webpages on cell phones and cell towers are not based on a published scientific review. The WHO EMF Project webpages were written by a scientist who <u>used wireless industry money</u> to start the WHO EMF Project and who is now a consultant to industry.

In contrast, the WHO International Agency for Research on Cancer (a separate WHO entity vetted for conflicts of interest) determined RF radiation to be a Class 2 B "possible" carcinogen in 2011. Many scientists now state the evidence showing cancer has increased.

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255 scientists who have published in the field signed the EMF Scientists Appeal which states "numerous recent scientific publications have shown that EMF affects living organisms at levels well below most international and national guidelines. Effects include increased cancer risk, cellular stress, increase in harmful free radicals, genetic damages, structural and functional changes of the reproductive system, learning and memory deficits, neurological disorders, and negative impacts on general well-being in humans. Damage goes well beyond the human race, as there is growing evidence of harmful effects to both plant and animal life."

419 scientists and doctors have signed the <u>European Union 5G Appeal</u> which states "5G will substantially increase exposure to radiofrequency electromagnetic fields [RF-EMF] on top of the 2G, 3G, 4G, Wi-Fi, etc. for telecommunications already in place. RF-EMF has been proven to be harmful for humans and the environment."

Over 3,500 medical doctors signed onto a 2020 Consensus statement that wireless RF

has been proven to damage biological systems at intensities below government limits (<u>See signatures here</u>, <u>PDF of Consensus Statement</u>).

Examples of Numerous Appeals by Medical Professionals: International Society of Doctors for Environment, Cyprus Medical Association, the Vienna Austrian Medical Chamber and the Cyprus National Committee on Environment and Children's Health, Belgium Doctors Appeal, Canadian Doctors, Cyprus Medical Association, Physicians of Turin, Italy, the German Doctors Appeal, International Appeal to Stop 5G on Earth and Space, Letter to President Trump, Letter to President Biden and Chilean Doctors.

There have been appeals and position statements for decades, read a full list here.

The New Hampshire State Commission 5G Report has 15 recommendations to protect the public.

- The Pittsburgh Law Review: <u>The FCC Keeps Letting Me Be: Why Radiofrequency Radiation Standards Have Failed to Keep Up With Technology</u> explains how the FCC and FDA have failed to develop adequate safety limits.
- The Harvard Press Book "<u>Captured Agency: How the Federal Communications Commission is Dominated by the Industries it Presumably Regulates</u>" details how wireless companies are using the Big Tobacco playbook and how the FCC is a captured agency.

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Research on 5G and Small Cell Radiation Exposure

American Academy of Pediatrics

Website Electromagnetic Fields: A Hazard to Your Health?

"In recent years, concern has increased about exposure to radio frequency (RF) electromagnetic radiation emitted from cell phones and phone station antennas. An Egyptian study confirmed concerns that living nearby mobile phone base stations increased the risk for developing:

- Headaches
- Memory problems
- Dizziness
- Depression
- Sleep problems

Short-term exposure to these fields in experimental studies have not always shown negative effects, but this does not rule out cumulative damage from these fields, so larger studies over longer periods are needed to help understand who is at risk. In large studies, an association has been observed between symptoms and exposure to these fields in the everyday environment." -American Academy of Pediatrics

Outdoor levels of RF are increasing due to the densification of wireless networks

Research documents increasing RF levels outdoors. An article published in *The Lancet Planetary Health*documents the increasing RF exposures and scientific research linking

exposure to adverse effects (Bandara and Carpenter 2018).

"It is plausibly the most rapidly increasing anthropogenic environmental exposure since the mid-20th century..."

A <u>2021 report</u> by the French government on 5G analyzed more than 3,000 measurements and found that RF levels had not yet significantly increased, but this was due to the lack of 5G traffic. So the researchers did additional measurements specific to 5G in the 3500 MHz band with artificially generated traffic and concluded, "initial results suggest an eventual increase of about 20% in overall exposure."

A <u>2018 multi-country study</u> published in *Environment International* measured RF in several countries and found cell tower/base station radiation to be the dominant contributor to RF exposure in most outdoor areas (<u>Sagar et al. 2018</u>). Urban areas had higher RF.

A <u>study</u> measuring RF exposure in the European cities of Basel, Ghent and Brussels found the total RF exposure levels in outdoor locations had increased up to 57.1% in one year (April 2011 to March 2012) and most notably due to mobile phone base stations.

A <u>2018 study</u> published in *Oncology Letters* documented "unnecessarily high" RF levels in several locations in Stockholm, Sweden. The authors conclude, "Using high-power levels causes an excess health risk to many people."

A 2017 Swedish study of Royal Castle, Supreme Court, three major squares and the Swedish Parliament found, despite the hidden, architecturally camouflaged RF-emitting antennas, passive exposure to RF radiation from cell antennas that was higher than RF levels associated with non-thermal biological effects in studies. The researchers note that the heaviest RF load falls on people working or living near hotspots.

A <u>2016 study</u> at Stockholm Central Railway Station in Sweden documented higher RF levels in areas where base station antennas were located closest to people. Importantly, the RF from the downlink of UMTS, LTE, GSM base station antennas contributed to most of the radiation levels.

Published Reviews Recommend Cell Towers Be Distanced Away From Homes and Schools

- The review paper entitled "Limiting liability with positioning to minimize negative health effects of cellular phone towers" reviewed the "large and growing body of evidence that human exposure to RFR from cellular phone base stations causes negative health effects." The authors recommend restricting antennas near homes, and restricting antennas within 500 meters of schools and hospitals to protect companies from future liability (Pearce 2020).
- An <u>analysis</u> of 100 studies published in *Environmental Reviews* found approximately 80% showed biological effects near towers. "As a general guideline, cell base stations should not be located less than 1500 ft from the population, and at a height of about 150 ft" (<u>Levitt 2010</u>).
- A <u>review</u> published in the <u>International Journal of Occupational and Environmental Health</u> found people living less than 500 meters from base station antennas had increased adverse neuro-behavioral symptoms and cancer in eight of the ten epidemiological studies (<u>Khurana 2011</u>).

A paper by human rights experts published in Environment Science and Policy documented

the accumulating science indicating safety is not assured, and considered the issue within a human rights framework to protect vulnerable populations from environmental pollution. "We conclude that, because scientific knowledge is incomplete, a precautionary approach is better suited to State obligations under international human rights law" (Roda and Perry 2014, PDF).

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