

DATE: January 17, 2019
TO: Healthy People 2030 (HP2030@hhs.gov)
FROM: Environmental Health Trust
SUBJECT: Healthy People 2030: Comments on Proposed Objectives

To Whom It May Concern:

In line with Healthy People 2030's mission to promote, strengthen and evaluate the Nation's efforts to improve the health and well-being of all people, [Environmental Health Trust \(EHT\)](#) writes to recommend the inclusion of new objectives related to controllable environmental health hazards such as radiofrequency radiation and comment on current proposed objectives. This document contains only our comments on currently proposed objectives; we have submitted our recommended new objectives through the Healthy People 2030 website.

EHT promotes a healthier environment through research, education, and policy. We are the only nonprofit, nonpartisan organization in the world that not only carries out cutting edge research on environmental health hazards but also works directly with communities, health and education professionals, and policymakers to understand and mitigate these hazards.

In 2011, the microwave radiation fields emitted by cell phones and other wireless devices were [classified as a 'possible carcinogen'](#) by the International Agency for Research on Cancer of the World Health Organization. Since this date, the scientific evidence has increased. Multiple published [reviews](#) now document the scientific evidence and assert that cellular radiofrequency radiation can be classified as a [Group 1 carcinogenic agent](#) to humans. For example, the recent \$30 million landmark [U.S. National Toxicology Program Study on Cell Phone Radiofrequency Radiation](#) found "clear evidence" that wireless radiofrequency radiation causes significant increases in a rare, highly malignant cancer in rats.

In addition to cancer, this radiation is associated with a wide array of adverse [health](#) and [environmental](#) effects, including but not limited to: reproductive harm, DNA damage, immune dysfunction, damage to the blood brain barrier, altered brain development, disruptions to heart functioning, mental health effects, sleep disturbances, tree/plant/crop damage, and disrupted migration and orientation of animals like birds and insects.

Wireless radiation limits in the United States are over twenty years outdated and do not adequately protect public health or the environment. Applicable Federal Communication Commission (FCC) standards for radiofrequency radiation emissions were set in 1996, long before the proliferation of modern wireless equipment. [As stated by the EPA](#), they do not account for current cumulative, long-term exposures, nor are they designed to protect populations at greater risk such as children, pregnant women, the unborn, the elderly, those with chronic illness, electromagnetically sensitive individuals, etc. In 2012, the [Government Accountability Office issued a report](#) stating that current FCC limits needed to be updated because they were not based on current science. Many organizations like the [American Academy of Pediatrics](#) have urged the FCC to update radiation standards to better protect children's health and reflect current use patterns. However, the FCC has yet to do so.

Other countries have far more stringent standards than the United States. Many countries such as China, India, Poland, Russia, Italy, and Switzerland have far more protective and strict [radiation limits](#) than the United States, setting exposure limits 100 times lower than this country.

Ambient exposures to radiofrequency radiation will increase significantly with the rollout of 5G “small cell” wireless facilities. These increases are documented in [reports](#) by industry researchers who state that full 5G deployment is not possible in countries with more protective radiofrequency radiation limits such as Poland, Italy and regions of Belgium.

Scientists, doctors, and other experts around the world have called for [greater protection from wireless and electromagnetic radiation exposures](#) and a [moratorium on the rollout of 5G](#) until health and environmental hazards have been fully investigated by independent scientists.

The [EMF Scientists Appeal](#) has been signed by over 240 scientists from over 41 countries and states,

“Collectively we also request that:

1. children and pregnant women be protected;
2. guidelines and regulatory standards be strengthened;
3. manufacturers be encouraged to develop safer technology;
4. utilities responsible for the generation, transmission, distribution, and monitoring of electricity maintain adequate power quality and ensure proper electrical wiring to minimize harmful ground current;
5. the public be fully informed about the potential health risks from electromagnetic energy and taught harm reduction strategies;
6. medical professionals be educated about the biological effects of electromagnetic energy and be provided training on treatment of patients with electromagnetic sensitivity;
7. governments fund training and research on electromagnetic fields and health that is independent of industry and mandate industry cooperation with researchers;
8. media disclose experts’ financial relationships with industry when citing their opinions regarding health and safety aspects of EMF- emitting technologies; and
9. white-zones (radiation-free areas) be established.”

In summary, radiofrequency and electromagnetic radiation is a controllable environmental health hazard with documented harms to human health and the environment, and its prevalence in the daily lives of Americans is increasing at a rapid rate. Healthy People 2030 represents an opportunity to take this and other increasingly prevalent environmental hazards into account.

EHT thus believes that our recommendations further Healthy People’s mission and goals, such as its goal of promoting healthy development, healthy behaviors and well-being across all life stages. Please see below for our comments on several currently proposed Healthy People 2030 objectives.

Environmental Health

- “Reduce the amount of toxic pollutants released into the environment” (EH-2030-07)

- Radiofrequency electromagnetic radiation and electromagnetic radiation are pollutants. Indeed, [insurance companies will not cover harm from electromagnetic radiation](#) and often additional “Pollution Liability” must be purchased to cover electromagnetic radiation damages. Thus, like other pollutants, its release into the environment should be reduced.
- “Reduce exposure to bisphenol A in the population, as measured by blood or urine concentrations of the substance or its metabolites.” (EH-2030-11)
 - Healthy People 2030 seems to be taking a precautionary approach to bisphenol A exposures, about which scientists and institutions across the world have warned, [despite the U.S. federal government’s position that it is safe at current levels](#). Similarly, it should be willing to take a precautionary approach to current radiofrequency radiation exposures, [about which scientists and organizations across the world are sounding the alarm](#), despite the federal government’s position.

Health Communication and Health IT

- “Increase the proportion of persons with broadband access to the Internet” (HC/HIT-2030-05)
 - This internet access should be fully wired, such as via fiber optic cables. Wired systems are safer and healthier than wireless systems, as they do not emit harmful radiofrequency radiation. They are also more energy efficient, cost effective, and more reliable. [Timothy Schoechle, Re-Inventing Wires: The Future of Landlines and Networks, National Institute for Science, Law and Public Policy \(NISLAPP\) \(2018\)](#).

Physical Activity

- “Increase the proportion of children and adolescents aged 2 to 17 years with total screen time for no more than 2 hours a day” (PA-2030-07)
 - We applaud this objective and note that screen time should be nonexistent for children under 2 years old. The [American Association of Pediatrics \(AAP\)](#) recommends avoiding digital media use (except video-chatting) in children younger than 18 to 24 months.

Sincerely,



Devra Davis, PhD, MPH
President, Environmental Health Trust
Visiting Prof. Hebrew Univ. Hadassah Medical Center & Ondokuz Mayis Univ. Medical School
Associate Editor, Frontiers in Radiation and Health