

Scott Carey

From: Theo Colborn <theo.colborn@medmail.ch>
Sent: Sunday, October 30, 2022 10:19 PM
To: Scott Carey
Subject: NTRPA Governing Board Meeting—November 3rd, 2022—No. 2: Public Comment
Attachments: Environmental-Health-in-Nursing_Unit III Environmental Health Sciences (EMF).pdf;
AAP-Letter-To-FCC-RF-Radiation-Review-2013.pdf

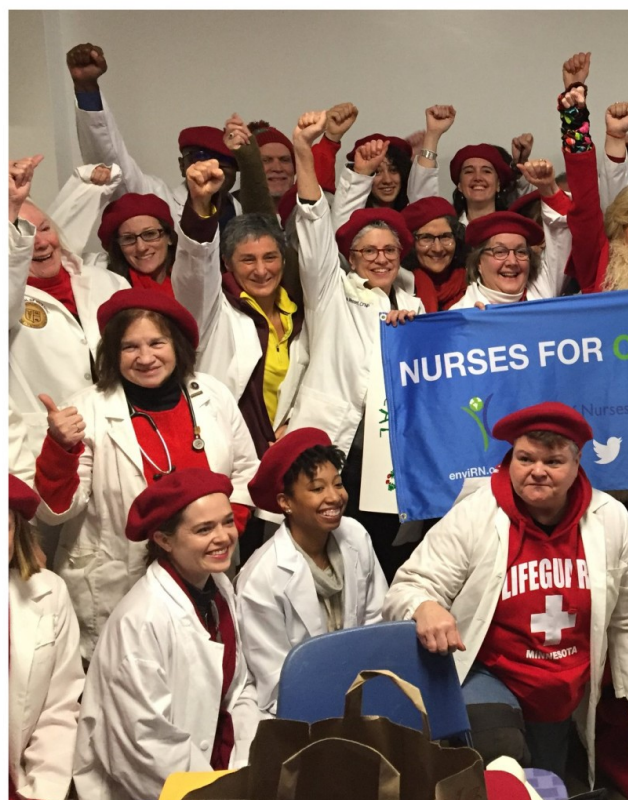
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Dear NTRPA Governing Board,

You must take the emerging environmental crisis—**that wireless and non-ionizing electromagnetic fields are a new form of environmental pollution**—very seriously! The last thing Tahoe, the public, and the nation needs at this critical juncture are a bunch of dinosaurs on the TRPA implementing 1950's public policy for the 21st century! Please read [Unit III: Environmental Health Sciences](#) pp. 136-153 (PDF pp. 143-160) of the below **medical textbook** currently being issued to thousands of nursing students and practicing nurses receiving "nursing continuing unit" (CEU) hours *across the country*:

Environmental Health in Nurs

2nd Edition



This chapter was written by **Catherine Dodd PhD, RN, FAAN** Environmental Health Consultant, former Chief District of Staff Speaker **Nancy Pelosi** and Deputy Chief of Staff for Health and Human Services to San Francisco Mayor (now **CA Governor Newsom**), former **Director Region IX USDHHS under President Clinton**.

I quote the textbook:

The wireless revolution and the expansion of the internet of things is rapidly increasing our exposure to non-ionizing electromagnetic fields (EMFs) now considered a new form of environmental pollution...Health and medical professionals recommend that we reduce these EMF exposures because of a growing body of research that documents adverse biological effects from low level exposures...non-ionizing radiation (e.g. Wi-Fi, wireless networks, cell tower radiation) has much lower energy and lower frequency waves. Decades ago, cell phones and wireless networks were brought to market without long term safety studies because the frequencies were nonionizing and assumed to be safe. While non-ionizing radiation is not thought to cause DNA damage in the same way that ionizing radiation does, recent studies indicate that DNA damage and other adverse health effects can result from non-ionizing radiation, via a more complex indirect process (p. 136)...Overexposure has been documented to induced central nervous system demyelinating disease mimicking Multiple Sclerosis (p. 137)...Cell tower networks are a significant source of a person's daily RF-EMF exposure, especially in urban areas...Cell tower RF-EMF penetrates into homes, especially through windows facing the beam of a nearby wireless antenna...The newest generations of wireless - 4G and 5G- will increase RF-EMF as these networks consist of thousands of new "small" cell towers built closer to homes (p. 138)...Reviews of animal and cell studies consistently find even very low EMF exposure associated with increased oxidative stress. Oxidative stress plays a role in the development of many diseases, such as cancer, diabetes, immune and neurodegenerative syndromes (p. 139)... Cell phone radiation has been found to alter brain activity...impact neurotransmitters and alter neuron development...In 2021, scientists published a consensus statement calling for the acknowledgement of electrohypersensitivity as a distinct neuropathological disorder...EMFs can add to our total body burden of carcinogens. Research has found that EMF exposure can act synergistically with other environmental pollutants potentiating harmful effects....For example, prenatal and postnatal mobile phone exposure has been linked to greater neurobehavioral effects in children with elevated lead levels...Analysis are accumulating that electricity and energy consumption of 5G and new wireless networks will contribute to greenhouse gasses and exacerbate climate change (p. 140)... There are studies finding that cell antenna RF-EMF can injure trees...and impact plant growth....A 2021 research review on effects to wildlife published in Reviews on Environmental Health references more than 1,200 scientific references which found impacts to wildlife, including pollinators, from even very low intensities of non-ionizing EMFs including impacts to orientation and migration, reproduction, mating, nest, den building and survivorship...the current body of science should trigger urgent protective regulatory action to protect wildlife... In 2018, the U.S. National Toxicology Program (NTP) found "clear evidence of cancer" and DNA damage in a large-scale animal

[study](#) designed to evaluate the effects of long term exposure to radio frequency radiation from cell phones...Research analyzing the NTP findings conclude **U.S safety limits need to be strengthened by 200 to 400 times** to protect children according to current risk assessment guidelines...The American Academy of Pediatrics has long recommended that FCC limits be updated to protect children and pregnant women ([p. 141](#))...

Please also observe and **add the following peer-reviewed research citations to the TRPA record:**

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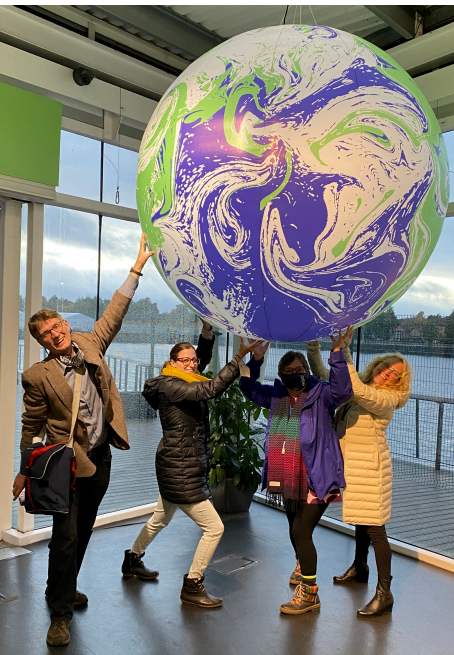
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Thank you in advance for addressing this emerging **environmental crisis**,

Theo Colborn

Environmental Health in Nursing

2nd Edition



Editors:

Ruth McDermott-Levy, PhD, MPH, RN, FAAN
Kathryn P. Jackman-Murphy, EdD, MSN, RN, CHSE
Jeanne Leffers, PhD, RN, FAAN
Adelita G. Cantu, PhD, RN, FAAN

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Reviewers:

Cara Cook, MS, RN, AHN-BC
Director of Program, Alliance of Nurses for Healthy Environments

Katie Huffling, DNP, RN, CNM, FAAN
Executive Director, Alliance of Nurses for a Healthy Environments

Claudia Smith, EdD, MPH, RN-BC
Community/Public Health Nursing Educator and Consultant, retired

Copy Editor:

Emily Hennessee, MPH

Intern:

Hope DeLorme
Environmental Science Major, University of Southern New Hampshire

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A NEW FORM OF ENVIRONMENTAL POLLUTION: WIRELESS AND NON-IONIZING ELECTROMAGNETIC FIELDS

Catherine Dodd PhD, RN, FAAN

Environmental Health Consultant, former Chief District of
Staff Speaker Nancy Pelosi and Deputy Chief of Staff for
Health and Human Services to San Francisco Mayor (now
CA Governor Newsom), former Director Region IX
USDHHS under President Clinton.

Theodora Scarato, MSW

Executive Director

Environmental Health Trust

The wireless revolution and the expansion of the internet of things is rapidly increasing our exposure to non-ionizing electromagnetic fields (EMFs) now considered a new form of environmental pollution (Russell, 2018, Bandara & Carpenter, 2018). Health and medical professionals recommend that we reduce these EMF exposures because of a growing body of research that documents adverse biological effects from low level exposures (Miller, 2019).

This chapter will introduce what EMFs are, how people are exposed, science documenting health effects of exposure, U.S. and international policy on protection from EMFs and nursing implications for clinical practice and advocacy in concert with ANA's principles.

WHAT ARE EMFS?

EMFs are invisible energy waves consisting of electric and magnetic fields. For thousands of years, humans have been exposed to natural EMFs - such as the magnetic field of the earth and light from the sun. However, exposure to human-made EMFs are a relatively recent phenomenon and the more complex data carrying signals of cellular networks have been found to have significant biologic effects. (Panagopoulos, 2015).

Humans are electrical beings. Our cells communicate with tiny electrical impulses which affect our heart, our brain, our nervous system, and our endocrine system. In health care, these electrical impulses are recorded as electric waves on electrocardiograms and electroencephalograms.

IONIZING RADIATION VERSUS NON-IONIZING RADIATION

Electromagnetic fields include two types of radiation: ionizing and non-ionizing. Ionizing radiation has intense high energy, high frequency waves which can remove electrons from atoms or "ionize them" causing cellular damage and directly breaking DNA. Ionizing radiation is known to cause cancer.

Ionizing radiation is used in healthcare both diagnostically (e.g. x-rays and CT scans), and therapeutically to reduce tumors (radiation treatment). Protective precautions such as lead shields and minimizing exposure are required. Health care institutions have procedures for nurses and other staff who with patients receiving ionizing radiation therapy to minimize the health care providers' exposures (Kaiser, 2001).

In contrast, non-ionizing radiation (e.g. Wi-Fi, wireless networks, cell tower radiation) has much lower energy and lower frequency waves. Decades ago, cell phones and wireless networks were brought to market without long term safety studies because the frequencies were non-ionizing and assumed to be safe. While non-ionizing radiation is not thought to cause DNA damage in the same way that ionizing radiation does, recent studies indicate that DNA damage and other adverse health effects can result from non-ionizing radiation, via a more complex indirect process (Lai, 2021, Panagopoulos et al., 2021).

The American Nurses Association Principles of Environmental Health for Nursing Practice were based on a Foundation of Principles including (among them): Human health is linked to the quality of the environment.

- A healthy environment is a universal need and fundamental human right.
- Current generations should meet their needs without compromising the ability of future generations to meet their own needs.
- Pollution prevention should occur at its source. The concern of nurses is the promotion, maintenance, and restoration of people's health.
- Nurses have an obligation to address health disparities and environmental injustice. The nurse collaborates with other professionals, policy makers, advocacy groups, and the public in promoting local, state, national, and international efforts to meet health needs.

(ANA's Principles of Environmental Health for Nursing Practice with Implementation Strategies, 2007)

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There are two main categories of non-ionizing EMF's of scientific research conducted to identify possible biological and environmental effects for over four decades.

- Magnetic Field Extremely Low Frequency (ELF-EMFs)- which are generated anywhere electricity flows such as powerlines, electrical wiring and charging cords.
- Radiofrequency (RF- EMFs) - also known as Radiofrequency Radiation (RFR) -which are the data/information carrying waves of cell phones and wireless networks (Moon, 2020).

In this chapter, unless otherwise noted, the acronym “EMF refers to both ELF and RFF.

WHY ARE EMF EXPOSURES IMPORTANT?

A large and increasing body of research in both human and animal studies have found that even legally allowed low level exposures are linked to a myriad of harmful biological effects including cancer, DNA damage and impacts to reproduction, nervous system and brain development (Bandara & Carpenter, 2018). The effects of new technology on human health are challenging to study because there is no unexposed control group in humans (Russell, 2018.)

SOURCES OF EMF EXPOSURES

Home and School Exposures

People are directly and indirectly exposed to EMFs from cell phones, computers, smart electronics and the myriad of Wi-Fi networks in their homes, workplaces and schools (see table 1). The use of wireless electronics by every age group continues to increase each year (Common Sense Media, 2019). Many school districts have robust Wi-Fi networks and students now use computers in school and at home for hours a day.

The use of electronics close to the body -e.g. laptops on laps, cell phones carried in a pocket or bra-create two kinds of intense EMF exposures to the body part closest to the device- RF from the wireless and ELF from the electricity. In addition, ELF exposures are elevated near charging cell phones, appliances, and electronics (Behrens et al., 2004).

Occupational Exposures

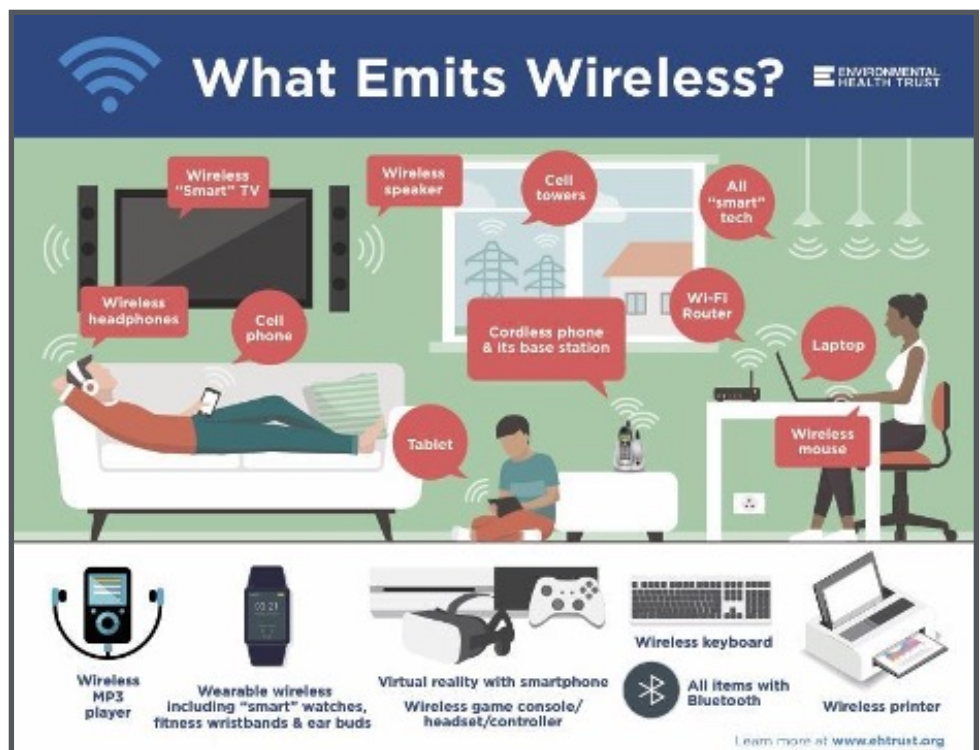
Cell phones, and wireless networks are common in today's workplace -e.g. in hospitals, schools, retail, transportation and numerous industries. There is a critical need to gather health data on these exposures (Stam, 2021). For example, many delivery drivers use cell phones and tablets to track packages and hospital workers often have a cell phone in their pocket, a walkie talkie clipped to their chest, and they use numerous wireless devices over the course of one day.

Cell tower/antenna maintenance workers, physical therapists using diathermy, and operators of dielectric welders have elevated EMF exposures. The latter two directly use high frequency EMFs to generate heat produced by EMFs (Aniołczyk et al., 2015). Overexposure has been documented to induced central nervous system demyelinating disease mimicking Multiple Sclerosis (Raefsky et al., 2020). Although U.S. National Institute for Occupational Safety and Health (NIOSH) scientists developed recommendations to reduce EMF, they were never implemented (Bowman, 2016).

Environmental Exposures

Environmental exposures to non-ionizing EMFs have dramatically increased over the last few decades (Bandara& Carpenter, 2018). People who live near high voltage powerlines and substations may have elevated ELF-

Figure 1



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Table I: Types and sources of EMF exposures

First-Hand Exposure (Devices Used Close to the Body)	Second-Hand Exposure (Devices and Networks Inside Homes, Schools and Buildings)	Environmental Exposure
ELF- EMF and Magnetic fields (*Also emit RF if wireless)		
<ul style="list-style-type: none"> • Cell phones, tablets and laptops * • Electric blankets • Charging phones and electronics * • Alarm clocks and radios plugged in directly near the body such as near beds 	<ul style="list-style-type: none"> • Wiring errors in electrical systems • Electric cars <p>Occupational sources</p> <ul style="list-style-type: none"> • Microwave ovens • Welding equipment • Appliances • Electrical equipment • Motors 	<ul style="list-style-type: none"> • High-voltage power lines • Power cables • Electrical transformers • Substations • Railways and electric trains
RF-EMF		
<ul style="list-style-type: none"> • Cell phones • Cordless phones • Wi-Fi tablets, laptops & computers • Walkie talkies • Wearable technology • Smart watches • Wireless keyboard and mouse • Bluetooth • Wireless Toys 	<ul style="list-style-type: none"> • Wi-Fi networks • Wi-Fi routers • Cordless phone base station • Wireless devices such as: • Baby monitors • Gaming consoles • Speakers • Security systems/hubs- doorbells with cameras • Virtual Assistants • Wireless printers 	<ul style="list-style-type: none"> • Cell towers • Small cell towers aka: Personal Wireless Facilities • Antennas mounted on buildings • Smart Meter networks

EMF throughout their home (Gagsek et al., 2013, Amoon et al., 2020).

Cell tower networks are a significant source of a person's daily RF-EMF exposure, especially in urban areas (Sagar et al., 2018). Cell tower RF-EMF penetrates into homes, especially through windows facing the beam of a nearby wireless antenna (Hardell et al., 2018). The newest generations of wireless - 4G and 5G- will increase RF-EMF as these networks consist of thousands of new "small" cell towers built closer to homes (El Hajj and Naous, 2020, Mzloum et al., 2019). It is estimated that 800,000 new cell towers will be needed in the U.S. (Shepardson, 2018). Researchers caution that increasing cell antennas closer to the ground, close to homes and schools will increase ambient RF exposures to people (Frank 2021, Koppel et al 2022, Pearce 2020).

WHO ARE MOST VULNERABLE TO HEALTH EFFECTS OF EMFS?

Children

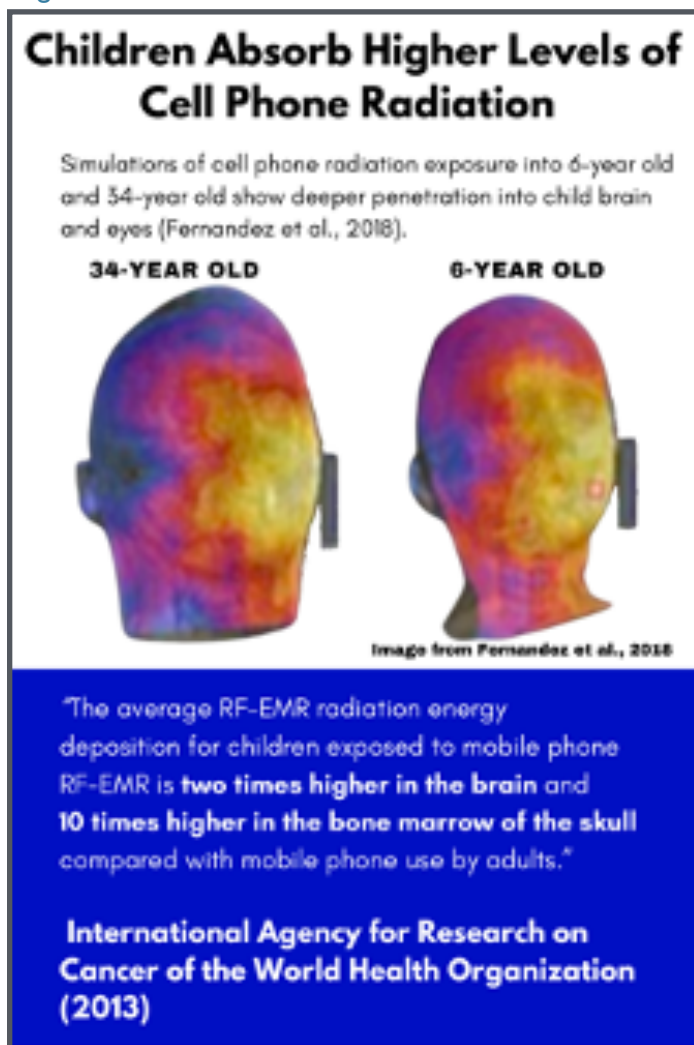
When cell phones first came on the market, no one could imagine the need for a child to use one. Now they are a favorite toy and used as babysitters. Children are uniquely vulnerable to EMFs just as they are to other environmental toxins. As wireless technology is now ubiquitous, children will receive a greater cumulative exposure than today's adults, with exposure starting before they are born (Miller et al., 2019). Both their ongoing physical development and physiology put them at greater risk.

- Children absorb proportionally higher doses of cell phone RF-EMF in the eyes and critical brain regions than adults due to their smaller heads, thinner undeveloped skulls and the higher water content in both their bodies and brain (Fernandez et al., 2018).

- Children's developing brains are more susceptible to neurotoxic exposures (Redmayne and Johansson, 2014 and 2015).
- Children have more active stem cells and stem cells have been found to be more sensitive to RF-EMF exposure (Markova et al., 2010).
- Safety limits for RF-EMF from cell phones and cell towers are outdated as they were set over two decades ago in 1996 and are based on the body of a large adult, not a child (Gandhi et al., 2012).

Researchers at Penn State Medical Center found reducing EMFs improved health outcomes in preterm infants (Passi et al., 2017). NICU equipment is linked to various impacts to the autonomic nervous system including melatonin production and heart rate and a 2017 review concluded that incubators should be redesigned to reduce exposure to the babies and caregivers (Bellieni et al., 2017).

Figure 2



Used with permission from Environmental Health Trust and Professor Claudio Fernandez.

Pregnancy

As with other environmental toxins, the developing fetus is particularly sensitive to exposure during critical developmental windows. Although more research needs to be done to fully understand the risk during windows of vulnerability, research on pregnant women has linked prenatal cell phone radiation exposure to oxidative stress and DNA damage in cord blood (Bektas et al., 2021); increased risk for miscarriage (Mahmoudabadi et al., 2015), lower birth weight (Lu et al., 2017), fetal growth impacts (Boileau et al., 2020), and preterm birth (Tsarna et al., 2019); as well as emotional/behavioral problems (Divan et al., 2012, Sudan et al., 2016) and hyperactivity (Birks et al., 2017) in their children. Animal studies have linked prenatal wireless exposure to DNA damage (Smith-Roe et al., 2020), brain damage (Tan et al., 2017), memory problems (Shahin et al., 2018) and hyperactivity (Aldad et al., 2012).

A Kaiser Foundation Research Institute team took measurements of the magnetic field ELF-EMF exposure of pregnant women and followed their pregnancies and subsequent birth and health of their children over time. They published a series of studies documenting links between higher prenatal magnetic field exposure (ELF-EMF) and miscarriage (Li et al., 2017) as well as ADHD (Li et al., 2020), obesity (Li et al., 2012), and asthma (Li et al., 2011) in children exposed prenatally.

Watch [BabySafe Project press conference](#) where Hugh Taylor MD, Chief of OBGYN at Yale Medicine and Devra Davis PhD, MPH presented on the scientific basis for the recommendations to reduce exposure.

PHYSIOLOGICAL IMPACTS OF ELECTROMAGNETIC FIELDS

Oxidative Stress and Preexisting Conditions

Reviews of animal and cell studies consistently find even very low EMF exposure associated with increased oxidative stress. Oxidative stress plays a role in the development of many diseases, such as cancer, diabetes, immune and neurodegenerative syndromes. The young, old and/or medically compromised individuals, whose immune system and defense mechanisms are already compromised, are more likely to experience health effects from the increased oxidative stress (Yakymenko et al., 2015, Schuermann & Mevissen, 2021).

Cancer

Researchers have long studied EMFs for their relationship to causation. In 2002, magnetic field ELF-EMF was classified by the World Health Organization International Agency for Research on Cancer (WHO/IARC) as a Group

2B possible carcinogen due to research findings that showed a relationship between residential exposure and increased childhood leukemia risk (WHO/IARC 2002). This association continues to be reported in more recent studies (Carpenter 2019, Seomun et al., 2021).

In 2011, the WHO/IARC concluded that wireless radiofrequency radiation (RF-EMF) was a Group 2B possible carcinogen largely based on studies of long term cell phone users with increased tumors-glioblastomas and acoustic neuromas (WHO/ IARC 2011). Several international experts conclude RF-EMF is a proven Group I human carcinogen (Miller et al., 2018, Peleg et al., 2018 Carlberg and Hardell 2017, Belpomme et al., 2018).

Examples of new scientific research that finds a carcinogenic effect for RF-EMF include:

- Two major animal studies investigating long-term exposure found the same tumors as found in human studies (U.S. National Toxicology Program, 2018, Falcioni et al., 2018).
- A 2020 meta-analysis linked cumulative cell phone use over 1000 hours increased tumor risk (Choi et al., 2020).
- Studies have found women who carry cellphones in the bra have elevated breast cancer risk (West et al., 2013, Shih et al., 2020).
- A Yale study funded by the American Cancer Society found elevated thyroid cancer risk in heavy cell phone users with specific genetic susceptibilities (Luo et al., 2020).

Reproduction

Systematic reviews associate RF-EMF with impacts to sperm (Kim et al., 2021, Yu et al., 2021) and decreased testosterone (Maluin et al., 2021) leading many researchers to conclude “it is recommended to keep the cell phone away from the pelvis as much as possible” (Hassanzadeh-Taheri et al., 2021).

Nervous System Impacts

The nervous system is sensitive to EMFs (Bertagna et al., 2021). Cell phone radiation has been found to alter brain activity (Volkow et al., 2011, Bin et al., 2014), impact neurotransmitters and alter neuron development (Kaplan et al., 2015, Li et al., 2021, Chen et al., 2021). Teenagers were found to experience memory damage to the area of the brain most exposed to cell phone radiation after just one year (Foerster et al., 2018).

Experimental animal research has found a variety of RF-EMF impacts especially in the brain regions critical to memory and learning (Sonmez, et al., 2010, Dasdag et al., 2015, Shahin et al., 2018, Obajuluwa et al., 2017, Tan et al., 2021, Hasan et al., 2021).

Electromagnetic Hypersensitivity

In 2021, scientists published a consensus statement calling for the acknowledgement of electrohypersensitivity as a distinct neuropathological disorder (Belpomme et al., 2021) and exposure to non-ionizing radiation has a series of ICD 10 codes.

Electromagnetic hypersensitivity (EHS) is characterized by the development of numerous symptoms linked to EMF exposure including: headaches, sleeping problems, concentration problems, nosebleeds, unexplained skin rashes, digestive problems, neurological problems, heart palpitations and disabling fatigue (Belyaev et al., 2016).

Synergistic Effects

EMFs can add to our total body burden of carcinogens. Research has found that EMF exposure can act synergistically with other environmental pollutants potentiating harmful effects (Kostoff and Lau, 2017). For example, prenatal and postnatal mobile phone exposure has been linked to greater neurobehavioral effects in children with elevated lead levels (Choi et al., 2017, Byun et al., 2017).

It is challenging to isolate an association epidemiologically because there is no unexposed control group (Russell, 2018.) Scientists must therefore rely on animal experiments which are carefully controlled to understand if the effects are caused by the exposure.

Animal studies have found combining ELF-EMF exposure with known carcinogens can increase tumors (Soffritti et al., 2016, Soffritti et al., 2016). EMFs can increase permeability of the blood brain barrier, thus, allowing more toxic agents to reach the brain (Sirav and Seyhan, 2016, Tang et al., 2015).

EMFs and the Environment

There are reports that the proliferation of cell antennas will have numerous environmental effects. Analysis is accumulating that electricity and energy consumption of 5G and new wireless networks will contribute to greenhouse gasses and exacerbate climate change (The Shift Project, 2019, Williams et al, 2022).

Further, trees are critical to a healthy environment. They filter toxic chemicals from the air, reduce ground-level ozone and absorb carbon dioxide emissions that are driving climate change (Terzaghi et al., 2020, Bastin et al., 2019). There are studies finding that cell antenna RF-EMF can injure trees (Waldmann-Selsam, C., et al., 2016, Breunig, 2017, Haggerty, 2010) and impact plant growth (Halgamuge, 2017, Pall, 2016).

A 2021 research review on effects to wildlife published in *Reviews on Environmental Health* references more than 1,200 scientific references which found impacts to wildlife, including pollinators, from even very low intensities of non-ionizing EMFs including impacts to orientation and migration, reproduction, mating, nest, den building and survivorship (Levitt et al., 2021a, b, c). The authors assert that the current body of science should trigger urgent protective regulatory action to protect wildlife.

A COMPLEX SCIENCE WITH LIMITED PROTECTIVE FEDERAL REGULATION AND HEAVY INDUSTRY INFLUENCE

U.S. and international scientists are calling for an update to the 1996 federal regulations and the need for independent research reviews in order to ensure the public is protected (Hardell & Carlberg, 2020). Similar to other environmental pollutants, literature reviews show conflicting results and industry funding has long been found to influence the results both in ELF and RF research (Hardell et al., 2006, Carpenter 2019, Huss et al., 2017). The official reports of many authorities have been criticized as having major conflicts of interest (Hardell 2017, Buchner & Rivasi, 2020).

The book, “Captured Agency” (Alster, 2015) identified a “revolving door” between industry, Congress and the Federal Communications Commission. The investigation compared the tactics of the wireless industry to Big Tobacco citing the heavy industry lobbying, the funding of science that shows no effect and the massive public relations campaigns designed to attack the credibility of the science and of scientists who do find harmful effects.

U.S. Policy

The Federal Communications Commission (FCC) established human exposure limits for cell phones and cellular network RF-EMF in 1996 and they have not been updated despite the dramatic changes in wireless communications in the last 25 years. The FCC is not a health agency and does not have medical or public health experts on staff. In 2021, a federal court ruled that the FCC needed to reexamine their decision to retain the 1996 limits (No. 20-1025, 2021). To date, governmental

health and environmental agencies such as the Environmental Protection Agency (EPA), the Food and Drug Administration (FDA), the Department of Health and Human Services and National Cancer Institutes have not reviewed the totality of the latest science on health effects of EMFs.

In 2018, the U.S. National Toxicology Program (NTP) found “clear evidence of cancer” and DNA damage in a large-scale animal study designed to evaluate the effects of long term exposure to radio frequency radiation from cell phones (U.S. National Toxicology Program, 2018). Although the FDA requested the studies, they rejected the study conclusions. Research analyzing the NTP findings conclude U.S safety limits need to be strengthened by 200 to 400 times to protect children according to current risk assessment guidelines (Uche & Naidenko, 2021).

The American Academy of Pediatrics has long recommended that FCC limits be updated to protect children and pregnant women (AAP, 2012 & 2013). In addition, cell phones and electronics are not tested the way people use devices today- in body contact positions. Although it is now commonplace to see children watching videos with a cell phones pressed against their chest, research has found that when phones are tested for exposure levels in body contact positions, they can exceed government limits up to 11 times the FCC limit (Gandhi, 2019). Pregnant women rest cell phones laptops on their abdomens, and research finds these positions create RF-EMF exposures into the fetal brain (Cabot et al., 2014) and can induce ELF-EMF in the fetus Bellieni et al., 2012).

Magnetic and ELF Safety Limits

The United States has no federal safety limit for magnetic fields or ELF-EMF. In contrast, over a dozen countries have some level of protective policy in place and they limit building homes in areas with magnetic field levels higher than the levels associated with childhood leukemia (Stam, 2018).

State and Local Policies

In the US, many states and localities have enacted laws related to Cell/Tower/Antenna placement. Physicians for Safe Technology and the Environmental Health Trust track state legislation and local ordinances. In 2020, the New Hampshire State Commission on 5G issued 15 recommendations which included several recommendations including large setbacks to distance cell antennas from homes and schools, replacing Wi-Fi with wired in schools and a public health campaign to educate families.

Figure 3

U.S. Policy and Recommendations on Cell Phones, Cell Towers and Wi-Fi

School Districts

"Best Practices" posted in classrooms – to turn Wi-Fi off when not in use.

- Ontario NY
- Ashland, MA

Information on how to reduce wireless.

- Worcester MA
- Montgomery County MD

Ban on Cell Towers

- Palo Alto Unified CA
- Los Angeles CA
- West Linn-Wilsonville OR
- Montgomery County MD
- Prince George's MD
- Portland OR

Teacher Unions

New York State United Teachers

- Resolution "Hazards of Wireless Radiation Emission" and "Best Practices" recommend wired ethernet connections.
- Webinar "Risks of wireless technologies and protecting children and staff in schools."

United Educators of San Francisco CA

- Resolution on Safer Technology calls for the California cell phone advisory on how to reduce cell phone exposure be disseminated to students and staff.
- Webinars on reducing RF exposure

State Public Health Departments

California Cell Phone Advisory (2017)

- Explains how to reduce cell phone exposure- especially for children.

Connecticut Cell Phone Advisory (2015)

- States that it "is wise" to reduce cellphone radiation to brain.

North Carolina Department of Occupational & Environmental Epidemiology

- Lists the American Academy of Pediatrics recommendations to reduce cell phone radiation

Cell Tower Setbacks

Numerous cities restrict cell antennas near homes with setbacks and strict ordinances including: Los Altos, Petaluma, Mill Valley, Malibu, Santa Barbara, Nevada City, Suisun, Calabasas, San Clemente, Westlake, Sonoma, Sebastopol, San Rafael, Ross Valley, Encinitas, Fairfax, Palo Alto, Walnut City and San Diego County CA, Ithaca and Scarsdale NY, Randolph, Great Barrington and Stockbridge MA

As an example, the Los Altos City ordinance prohibits installation of small cells on public utility easements in residential and has a 500 ft school setback. San Diego County does not allow small cells within 1,000 feet of schools, child care centers, hospitals, or churches.

Cell Phone Right To Know Laws

San Francisco CA (2010) & Berkeley CA (2015)

- Informed consumers that phones emit radiation and should not be in body contact.
- Passed but not implemented after wireless industry lawsuits.

New Jersey Education Association

Recommendations (2016)

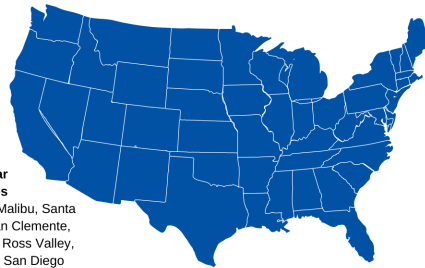
- Hard wire devices, printers, projectors and boards.
- Use hard-wired phones instead of cell or cordless phones.
- Put devices in airplane mode.

New Hampshire State

2020: Final Report of Commission on Health & Environmental Effects of 5G

15 recommendations include:

- An independent federal study of health effects
- Educational campaign to reduce public exposure.
- Replace Wi-Fi with wired in schools and libraries.
- Setbacks for antennas from schools and homes
- Measure cell network radiation levels.
- Establish wireless radiation limits to protect trees, plants, wildlife and insects.
- Require software changes to reduce emissions.
- Establish wireless radiation-free zones.
- An environmental impact assessment on 5G.



Maryland State Council

Council on Children's Environmental Health Report (2017)

- Install wired networks instead of Wi-Fi when building schools.
- Reduce wireless exposure in schools.

Resolutions Halt 5G and/or Study Health Effects

- Hawai'i County HI
- Easton CT
- Farragut TN
- Hallandale FL
- Keene NH
- Carmel City IN

Proclamations Cell Phone Radiation

- Portland ME
- Pembroke Pines FL
- Jackson Hole WY

EMF Hypersensitivity

- Alabama
- Colorado
- Connecticut
- Broward County FL



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International Policies and Actions

Internationally governments have policies and regulations in place to inform the public and reduce exposures. Numerous scientists, medical and public health professionals have issued appeals and recommendations on the need to reduce exposure to electromagnetic radiation and pause the proliferation of new untested networks (EMF Scientists Appeal, 2015, Di Ciaula, 2018, Mallery-Blythe, 2020, Nyberg & Hardell, 2017)

- Switzerland, Italy, China, Russia, India, Israel and several European countries have far more stringent cell tower radiation emission limits compared to the US FCC and many define homes, schools and kindergartens as "sensitive areas" (Stam, 2017).
- Over a dozen countries have clear recommendations that people reduce exposure to cell phone radiation, especially for children (Redmayne, 2016, EHT, 2021).
- France has several policies including: limiting Wi-Fi in classrooms, banning the sale of cell phones designed for young children, banning advertisements aimed at children under 14 years old. Consumers are informed with instructions to use speakerphone, limit children's use and "keep away from the belly of pregnant women and lower abdomen of adolescents."
- Cyprus and French Polynesia have multimedia public education campaigns (EHT, 2021).

- A major hospital in Cyprus removed Wi-Fi from the pediatric Intensive Care Unit and Neonatal units (Cyprus Committee on Environment and Children's Health, 2019).

IMPLICATIONS FOR NURSING PRACTICE

In 1992, the International Council of Nurses made environmental health, preventing illness by eliminating environmental toxins a priority (as cited in ANA's Principles of Environmental Health for Nursing Practice with Implementation Strategies 2007). Nurses can protect human health and the environment through prevention, clinical practice, and advocacy.

Prevention

Nurses are trusted advisors. Nurses must first protect themselves and their families, their patients, and their communities by learning how to decrease exposures to EMFs. Small lifestyle changes can significantly reduce cellular damage of our total lifetime exposure. We can then educate our patients- especially parents and vulnerable populations. Nurses can work in coalition with other groups to educate why and how to reduce EMF exposures in the workplace, schools, and communities. People need to know how to eliminate unnecessary sources of EMFs and choose safe alternatives. Tips and checklists follow.

Table 2: Ways to reduce exposure to cell phone radiation

American Academy of Pediatrics Reducing Cell Phone Radiation Recommendations

- Prefer texting to voice calls
- Use cell phones in speaker mode or hands-free.
- Hold cell phone at a distance from head.
- Make only short or essential calls on cell phones.
- Avoid carrying your phone against the body like in a pocket, sock, or bra.
- Do not talk on the phone or text while driving.
- If you plan to watch a movie on your device, download it first, then switch to airplane mode while you watch in order to avoid unnecessary radiation exposure.
- Minimize use in areas of low signal (i.e. how many bars you have). The weaker your cell signal, the harder your phone has to work and the more radiation it gives off.
- Avoid making calls in cars, elevators, trains, and buses. The cell phone works harder to get a signal through metal, so the power level increases.
- Remember that cell phones are not toys or teething items.

(American Academy of Pediatrics, 2016)

Resources on How To Reduce Cell Phone Radiation

- [EHT Steps to Reduce Cell Phone Radiation](#)
- [Cell Phone Tip Card from Grassroots Environmental Education](#)
- [Downloadable Posters on Reducing Cell Phone Radiation](#)

Reducing EMFs During Pregnancy

During pregnancy, new parents are highly motivated to learn everything they can to have a healthy baby. This is a great opportunity for nurses to give parents information.

The [Baby Safe Project](#) website includes [five simple ways to reduce exposure](#), downloadable brochures in French and Spanish.

Reducing EMFs at Home

- Replace cordless phones with corded telephones
- Minimize wireless use. Start by turning Wi-Fi off at night. Then install wired ethernet connections instead of Wi-Fi.

Reducing EMFs at Home (Cont.)

- Use wired mouse, keyboard, speaker, and printer.
- Use wired alarm systems and doorbells not wireless
- Keep devices on a table off the lap/body.
- Do not use wireless speakers or virtual assistants.
- Keep mobile devices and chargers out of bedrooms.
- Eliminate baby monitors and wireless cameras.
- Refuse Smart meters and request analog, non-wireless utility (water, electricity, gas) meter options.
- [Safe Technology at Home](#)
- [Checklist for Reducing EMF at Home](#)
- [How to Connect Your Laptop with Ethernet Instead of Wi-Fi](#)

Tips for Reducing Magnetic Field EMF

- Use tablets, laptops and electronics on a table, not the lap.
- Do not use a cell phone or device while it is charging.
- Charge phones and devices away from beds and away from your body.
- Remove screens and electronics from the bedroom - especially around your bed and the crib.
- Avoid sleeping with electric blankets and heating pads.
- Ensure you are not sleeping against a wall with the utility meter on the other side.
- Get magnetic field measurements, especially if you live close to high voltage power lines.
- [Building science and radiofrequency radiation: What makes smart and healthy buildings: Reduce EMF](#)
- [Collaborative for High Performance Schools Reduce RF and Low EMF Criteria](#)
- [How to Reduce EMF in Schools](#)
- [Safe Tech for Kids: What to do about children's increased use of technology during Covid-19](#)

Clinical Practice

Nurses can integrate their understanding of EMFs into their clinical practice and include interview questions about technology use and EMF exposure in their assessments. When patients present with EHS symptoms, such as headache, insomnia, irritability, they should be further assessed for EMF sensitivity.

Helpful Resources include:

- [Physicians for Safe Technology](#) EHS information includes Clinical Interview Questions

- [Austrian Medical Association EMF Guidelines](#) Has algorithms and a sample patient questionnaire.
- [The Environmental Health Clinic, Women's College Hospital at the University of Toronto Practice Guidelines for Diagnosis and Treatment](#) (Bray, 2020)
- [EMF Medical Conference 2021 offers CME Online](#)
- [Electrosensitivity Society](#) Providers in US and Canada

ADVOCACY

Protecting Health Requires Nurses To Be Advocates for Systematic Policy Change

Just as with other environmental issues, nurses have a responsibility to act to protect individuals and communities by supporting meaningful policy change.

Nurses bring credibility on health issues to advocacy and our voices are important in developing protective policy. Working in coalition with other organizations always strengthens the message (e.g. parent groups, environmental organizations, faith-based organizations, etc.).

- Nursing organizations can adopt resolutions or policy positions on wireless and EMF exposures. See the resolution of the California Medical Association.
- Nurses can join “safe tech” organizations and coalitions to support policies that reduce EMF exposures in our workplaces, schools, and communities. These include the citing of small cell antennas in neighborhood and sensitive areas and advocate for wired internet connection to and into the building: FASTER, SAFER, RELIABLE, and if it is a municipal/community partnership, it will eliminate the digital divide. Learn more at: [SafeG.net](#)
- Nurses and nursing organizations fighting climate change can lobby elected officials to take into account the carbon footprint of wireless technology. Download Environmental Health Trust's Fact sheet on 5G and Climate Change which describes research showing escalating energy consumption from 5G networks.
- As environmental health advocates, nurses can educate and work with schools, parents, teachers, and unions to reduce EMF exposures in schools, replace Wi-Fi with wired internet connections and ensure cell towers are not built near schools or daycare centers.

RESOURCES

Resources for Safe Schools

[Environmental Health Trust](#)

[Physicians for Safe Technology](#)

[Santa Clara Medical Association](#)

[Wi-fi In Schools: Are We playing It Safe With Our Kids?](#)

[Shallow Minds: How the Internet and Wi Fi in Schools Can Affect Learning](#)

[How To Reduce EMFs in Schools](#)

[New Jersey Education Association Article](#), [PDF of Recommendations](#)

[Maryland State Children's Environmental Health and Protection Advisory Council](#)

[Collaborative for High Performance Schools Low EMF Criteria](#)

[Grassroots Environmental Education](#)

[Environmental Health Trust Checklist for Schools](#)

[Websites](#)

[Environmental Health Trust](#)

[Environmental Working Group](#)

[Physicians for Safe Technology](#)

[Americans for Responsible Technology](#)

[Dr. Joel Moskowitz](#), UC Berkeley School of Public Health, Director, Center for Family and Community Health

[Educational Webinars](#)

[Dr. Joel Moskowitz “Health Effects of Cell Phones and Wireless: Implications for 5G” Center for Occupational and Environmental Health Webinar](#)

[Dr. Devra Davis “Children, Wireless Radiation and Health” Cyprus Pediatric Symposium](#)

[Expert Webinar “What Environmental Health Leaders Need to Know”](#)

[Downloads/Printables](#)

[EHT Posters and Factsheets](#)

[American Academy of Pediatrics Letters](#)

[Santa Clara Medical Organization](#)

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The editors of Environmental Health in Nursing, 2nd edition would like to sincerely thank the authors who generously contributed their time, knowledge, and expertise to this edition. Without our dedicated authors we would not be able to share the quality of important environmental health information that is contained in the e-text. This work was a labor of love. Love of Earth's people, families, communities, and the planet that sustains us. We hope that you find this information useful to expand your nursing practice to include environmental health.

With gratitude,

Ruth McDermott-Levy, PhD, MPH, RN, FAAN

Kathryn P. Jackman-Murphy, EdD, MSN, RN, CHSE

Jeanne Leffers, PhD, RN, FAAN

Adelita Cantu, PhD, RN, FAAN



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Mission of ANHE: Promoting healthy people and healthy environments by educating and leading the nursing profession, advancing research, incorporating evidence-based practice, and influencing policy.

enviRN.org



AAP Headquarters

141 Northwest Point Blvd
Elk Grove Village, IL 60007-1019
Phone: 847/434-4000
Fax: 847/434-8000
E-mail: kidsdocs@aap.org
www.aap.org

Reply to

Department of Federal Affairs

Homer Building, Suite 400 N
601 13th St NW
Washington, DC 20005
Phone: 202/347-8600
Fax: 202/393-6137
E-mail: kids1st@aap.org

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August 29, 2013

The Honorable Mignon L. Clyburn
Acting Commissioner
Federal Communications Commission
445 12th Street SW
Washington, DC 20054

The Honorable Dr. Margaret A. Hamburg
Commissioner
U.S. Food and Drug Administration
10903 New Hampshire Avenue
Silver Spring, MD 20993

Dear Acting Chairwoman Clyburn and Commissioner Hamburg:

The American Academy of Pediatrics (AAP), a non-profit professional organization of 60,000 primary care pediatricians, pediatric medical subspecialists, and pediatric surgical specialists dedicated to the health, safety and well-being of infants, children, adolescents, and young adults appreciates this opportunity to comment on the Proposed Rule "Reassessment of Exposure to Radiofrequency Electromagnetic Fields Limits and Policies" published in the Federal Register on June 4, 2013.

In the past few years, a number of American and international health and scientific bodies have contributed to the debate over cell phone radiation and its possible link to cancer. The International Agency for Research on Cancer (IARC), part of the United Nations' World Health Organization, said in June 2011 that a family of frequencies that includes mobile-phone emissions is "possibly carcinogenic to humans." The National Cancer Institute has stated that although studies have not demonstrated that RF energy from cell phones definitively causes cancer, more research is needed because cell phone technology and cell phone use are changing rapidly. These studies and others clearly demonstrate the need for further research into this area and highlight the importance of reassessing current policy to determine if it is adequately protective of human health.

As radiation standards are reassessed, the AAP urges the FCC to adopt radiation standards that:

- **Protect children's health and well-being.** Children are not little adults and are disproportionately impacted by all environmental exposures, including cell phone radiation. Current FCC standards do not account for the unique vulnerability and use patterns specific to pregnant women and children. It is essential that any new standard for cell phones or other wireless devices be based on

protecting the youngest and most vulnerable populations to ensure they are safeguarded throughout their lifetimes.

- **Reflect current use patterns.** The FCC has not assessed the standard for cell phone radiation since 1996. Approximately 44 million people had mobile phones when the standard was set; today, there are more than 300 million mobile phones in use in the United States. While the prevalence of wireless phones and other devices has skyrocketed, the behaviors around cell phone uses have changed as well. The number of mobile phone calls per day, the length of each call, and the amount of time people use mobile phones has increased, while cell phone and wireless technology has undergone substantial changes. Many children, adolescents and young adults, now use cell phones as their only phone line and they begin using wireless phones at much younger ages. Pregnant women may carry their phones for many hours per day in a pocket that keeps the phone close to their uterus. Children born today will experience a longer period of exposure to radio-frequency fields from cellular phone use than will adults, because they start using cellular phones at earlier ages and will have longer lifetime exposures. FCC regulations should reflect how people are using their phones today.
- **Provide meaningful consumer disclosure.** The FCC has noted that it does not provide consumers with sufficient information about the RF exposure profile of individual phones to allow consumers to make informed purchasing decisions. The current metric of RF exposure available to consumers, the Specific Absorption Rate, is not an accurate predictor of actual exposure. AAP is supportive of FCC developing standards that provide consumers with the information they need to make informed choices in selecting mobile phone purchases, and to help parents to better understand any potential risks for their children. To that end, we support the use of metrics that are specific to the exposure children will experience.

The AAP supports the reassessment of radiation standards for cell phones and other wireless products and the adoption of standards that are protective of children and reflect current use patterns. If you have questions, please contact Clara Filice in the AAP's Washington Office at 202/347-8600.

Sincerely,

A handwritten signature in cursive script that reads "Thomas K. McInerney".

Thomas K. McInerney, MD FAAP
President

TKM/cf