Problems with SCENIHR reports on EMF:

- The studies which are included for their reviews are selected in a subjective way:

They only include the studies which to their opinion are '*scientifically robust'*, which follow a '*strict protocol'*. They only look at the '*best science'*. Studies that SCENIHR members consider to be 'preliminary', which are not published in English, which are not peer-reviewed, etc. are all not taken into consideration

This all sounds very nice and reliable, but the problem is that scientific 'robustness' is a very subjective criterion. It allows the SCENIHR to ignore potentially important findings. Several people have noticed that references of studies which find harmful effects are often missing in the bibliography of SCENIHR reports. Public complaints about this (for example given in the context of the public consultations of their reports) are ignored.

Also, it's the studies funded by the telecommunications and wireless companies which tend to be the scientifically most robust, as these companies have the financial means to conduct technically qualitative studies. Independent researchers on the contrary often have hard time finding sufficient money for their research.

However, research has shown that industry-funded studies are nine times less likely to find harmful effects. A technically very 'robust' study can still be designed in such a way that harmful effects won't be found. A one-sided focus one only the most robust studies thus favors industry-studies and thus studies which are likely to find no harmful effects.

- The source of funding of the reviewed studies is not taken into account

It is crucial that the history of for example tobacco and asbestos is kept in mind and that lessons are learnt from these issues. After the emergence of the first indications for the harmfulness of for example asbestos, decades went by before there was *robust* scientific evidence of the harmfulness and even more decades went by before there was general recognition amongst policy makers of the harmfulness and measures were taken.

Now the question is why? Why did it take decades before measures were taken? Social scientists have studies this issue, and internal documents of the tobacco industry have revealed that they used a specific strategy to keep the scientific discussion going for as long as possible, in an attempt to stall policy measures. Their strategy was essentially one of sowing doubt. The goal was to sow (scientific) doubt and uncertainty about the harmful effects in order to keep the scientific discussion going for as long as possible.

One way in which the tobacco industry achieved this, was by funding scientific research. Scientific studies funded by the tobacco industry often failed to find harmful effects. This was not because these studies were not scientifically 'robust'. On the contrary, tobacco companies had the financial means to conduct studies that were of a high technical-scientific quality. Technically, there was nothing wrong with them. Nevertheless, the studies were designed in such a way, that no harmful effects *could* be found.

Because the results of the tobacco-industry studies conflicted with the results of independent studies, for a long time, scientific reviews came to the conclusion that there was no '*consistent'* evidence, that there was no '*hard'* proof.

A study published in the scientific journal Environmental Health Perspectives (Huss et al., 2007) analysed the influence of the source of funding on the results of studies into the health effects of EM radiation. This study found that studies funded by telecommunication companies, were *nine* times less likely to find harmful effects. The authors of the study conclude:

"Our study indicates that the interpretation of the results from studies of the health effects of radiofrequency radiation should take sponsorship into account."

The SCENIHR mandate should thus be extended to do exactly this, to avoid the mistakes made with tobacco and asbestos.

- No numerical data on the weight of the evidence are given

It is very unclear how exactly the SCENIHR comes to its final conclusions but it is clear that this is also done in a rather subjective way.

For example, the SCENIHR does not give numerical data to back up its conclusion, like for instance the percentage of (non-industry-funded) studies which find harmful effects and those who don't. This would provide an objective idea of the weight of the evidence. But according to the SCENIHR, the giving of percentages would 'make no sense' or would 'confusing'. It is however unclear how providing objective, numerical facts is confusing and why conclusions based solely on subjective judgments are not.

- Contradictory statements

On the one hand, the SCENIHR is constantly saying that there aren't enough scientific data to draw conclusions. When SCENIHR-members are confronted with the results of preliminary studies that do find harmful effects, they reply that there are too little data on long-term effects, the results are contradictory, the health relevance is uncertain, etc. In other words, when it comes to the studies which find harmful effects, the SCENIHR is very keen on denying their relevance.

On the other hand, in its report the SCENIHR does in fact put forward clear statements, which essentially conclude that there isn't a problem and that the current guidelines don't need to be revised.