



**Scientific Committee on Health, Environmental and Emerging
Risks
SCHEER**

**Opinion on the need of a revision of the annexes in the Council
Recommendation 1999/519/EC and Directive 2013/35/EU, in
view of the latest scientific evidence available with regard to
radiofrequency (100kHz - 300GHz)**



The SCHEER adopted this document by written procedure on 18 April 2023

ABSTRACT

The SCHEER has considered meta-analyses, systematic reviews, and, when necessary, narrative or scope reviews and single research papers published since 2015 on radiofrequency electromagnetic fields (100 kHz to 300 GHz).

The SCHEER could not identify moderate or strong level of evidence for adverse health effects resulting from chronic or acute RF EMF exposure from existing technology at levels below the limits set in the annexes of Council Recommendation 1999/519/EC and Directive 2013/35/EU.

The SCHEER advises positively on the need of a technical revision of the annexes in Council Recommendation 1999/519/EC and Directive 2013/35/EU with regard to radiofrequency electromagnetic fields (100 kHz to 300 GHz), because there is a need to recognize the recently introduced dosimetric quantities and establish limits for them.

Keywords: Radiofrequency, Electromagnetic Fields, Health effects, Biological effects, Interaction mechanisms

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SCHEER

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- complex or multidisciplinary issues requiring a comprehensive assessment of risks to consumer safety or public health, for example antimicrobial resistance, nanotechnologies, medical devices and physical hazards such as noise and electromagnetic fields.

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1 MANDATE FROM THE EU COMMISSION SERVICES

The following part is provided by the requesting Commission service.

1.1 Background

Council Recommendation of 12 July 1999¹ (hereafter Recommendation) on the limitation of exposure of the general public to electromagnetic fields (0 Hz to 300 GHz) sets out basic restrictions and reference levels for the exposure of the general public to electromagnetic fields (EMFs). These restrictions and reference levels are based on the guidelines published by the International Commission on Non Ionizing Radiation Protection in 1998 (ICNIRP)². In response to the Recommendation, all Member States have implemented measures to limit the exposure of the public to EMF, either by implementing the provisions and reference levels and limits proposed by the Recommendation, or by implementing more stringent provisions³. In particular, twenty (20) Member States follow the Recommendation/ICNIRP Guidelines, while seven (7) impose stricter limits than those of the Recommendation.

In relation to the protection of workers' health and safety, Article 153 of the Treaty on the Functioning of the European Union foresees that the European Parliament and the Council can adopt by means of directives minimum requirements for the improvement, in particular, of the working environment to protect workers' health and safety, in order to support and complement the activities of Member States. In this context, the Council and the Parliament adopted Directive 2004/40/EC of 29 April 2004⁴ on the minimum health and safety requirements regarding their exposure to the risks arising from physical agents such as electromagnetic fields which was repealed by Directive 2013/35/EU⁵. Member States had to transpose Directive 2013/35/EU by 1st July 2016. It lays down minimum requirements including action levels and exposure limit values for electromagnetic fields. In accordance with Article 153 of the TFEU, Member States are allowed to maintain or adopt more stringent protective measures for the protection of workers.

The Recommendation also invites the Commission to "*keep the matters covered by this recommendation under review, with a view to its revision and updating, taking into account possible effects, which are currently the object of research, including relevant aspects of precaution (paragraph 4)*". The ICNIRP guidelines were endorsed by the Scientific Steering Committee (SSC)⁶ in its Opinion on health effects of EMFs of 25-26 June 1998. The Scientific Committee on Toxicity, Ecotoxicity and the Environment (CSTEE) prepared an update of the Scientific Steering Committee's Opinion and concluded in its Opinion on "*Possible effects of Electromagnetic Fields (EMF), Radio Frequency Fields (RF) and Microwave Radiation on human health*", of 30 October 2001, that the information that had become available since the SSC Opinion of June 1999 did not justify revision of the exposure limits recommended by the Council⁷. The Opinions delivered by the SCENIHR in March 2007⁸, January 2009⁹, July 2009¹⁰ and January 2015¹¹ confirmed the earlier

¹ (OJ. L 199/59, 30.07.1999)

² <http://www.icnirp.de/>

³ http://ec.europa.eu/health/electromagnetic_fields/role_eu_ms/index_en.htm

⁴ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32004L0040&from=en>

⁵ <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:179:0001:0021:EN:PDF>

⁶ http://europa.eu.int/comm/food/fs/sc/ssc/index_en.html

⁷ The main frequencies in the ELF frequency range are 50 Hz in Europe and 60 Hz in North America. The RF and lower microwave frequencies are of particular interest for broadcasting, mobile telephony. The 2.45 GHz frequency is mainly used in domestic and industrial microwave ovens

⁸ http://ec.europa.eu/health/ph_risk/committees/04_scenihr/docs/scenihr_o_007.pdf

⁹ http://ec.europa.eu/health/ph_risk/committees/04_scenihr/docs/scenihr_o_022.pdf

¹⁰ http://ec.europa.eu/health/ph_risk/committees/04_scenihr/docs/scenihr_o_024.pdf

¹¹ https://ec.europa.eu/health/scientific_committees/emerging/docs/scenihr_o_041.pdf

conclusion of the CSTE and again highlighted the need for additional data and research on this issue and recommended that specific research areas should be addressed.

The Commission relies on the SCHEER to periodically review new information that may influence the assessment of risks to human health in this area and to provide regular updates on the scientific evidence base to the Commission.

Since June 2014, the cut-off date for the previous review by the SCENIHR, a sufficient number of new scientific publications have appeared to warrant a new analysis of the scientific evidence on possible effects on human health of exposure to EMF.

In addition, ICNIRP has released new guidelines for the protection of humans exposed to radiofrequency electromagnetic fields in March 2020. While the 1998 guidelines already provide protection regarding EMF exposure in all frequency bands for existing technologies, and all bands currently envisaged for 5G, the new guidelines provide additional guidance on a set of issues relevant to the latest developments in 5G technology and cover the range 100 kHz to 300 GHz¹².

The full guidelines are published in the scientific journal Health Physics and are accessible at the website of ICNIRP¹³.

Consequently, the SCHEER is being asked to examine this new scientific evidence and to address in particular the questions listed in the Terms of Reference.

1.2 Terms of reference

The scientific committee SCHEER is consulted on the need of a (technical) revision of the Council Recommendation 1999/519/EC annexes and of the annexes of Directive 2013/35/EU in view of the latest scientific evidence available, in particular the ICNIRP guidelines updated in 2020¹⁴ with regard to radio frequency (100 kHz to 300 GHz).

Opinion I

To advise on the need of a (technical) revision of the Council Recommendation 1999/519/EC annexes and of the annexes of Directive 2013/35/EU in view of the latest scientific evidence available, in particular that of the ICNIRP-guidelines updated in 2020, with regard to radio frequency 100 kHz to 300 GHz.

Opinion II

To update the SCENIHR Opinion of 2015 in the light of the latest scientific evidence with regard to frequencies between 1Hz and 100 kHz.

1.3 Deadline

Preliminary Opinion I: July 2022

Preliminary Opinion II: July 2023

¹² <https://www.icnirp.org/en/publications/article/rf-guidelines-2020.html>; <https://www.icnirp.org/en/rf-faq/index.html>

¹³ <https://www.icnirp.org/en/publications/index.html>

¹⁴ <https://www.icnirp.org/cms/upload/publications/ICNIRPrfqi2020.pdf>

2 OPINION

- The SCHEER has considered meta-analyses, systematic reviews, and, when necessary, narrative or scope reviews and single research papers published after the (2015) SCENIHR Opinion on potential health effects of exposure to radiofrequency (RF) electromagnetic fields (EMF).
- The SCHEER notes that there is uncertain weight of evidence for interaction mechanisms in *in vitro* studies, involving oxidative balance, genetic and epigenetic effects, and calcium signalling, that can result in biological effects.
- The SCHEER could not identify moderate or strong level of evidence for adverse health effects resulting from chronic or acute RF EMF exposure from existing technology at levels below the limits set in the annexes of Council Recommendation 1999/519/EC and Directive 2013/35/EU.
- The SCHEER has noted the technical progress achieved since the ICNIRP (1998) exposure guidelines in the areas of computational and experimental exposure assessment and dosimetry, allowing for an increased accuracy of human exposure evaluation.
- The SCHEER has also noted that new and emerging wireless applications using RF EMF tend to use higher frequencies and lower emitted power in closer vicinity to the human body. However, there are situations where beam focusing or intense pulsed radiation can increase exposure for short times.
- The SCHEER acknowledges that the latest (2020) ICNIRP exposure guidelines respond to the developments in RF EMF and introduce new dosimetric quantities and limits to them, that can protect humans more effectively from emerging technological applications of RF EMF, and, therefore, advises positively on the need of a technical revision of the annexes in Council Recommendation 1999/519/EC and Directive 2013/35/EU with regard to radiofrequency electromagnetic fields (100 kHz to 300 GHz).

3 MINORITY OPINIONS

None

4 METHODOLOGY

4.1 Data/Evidence

The SCHEER, on request of Commission services, provides scientific opinions on questions concerning health, environmental and emerging risks. The scientific assessments carried out should always be based on scientifically accepted approaches, and be transparent with regard to the data, methods and assumptions that are used in the risk assessment process. They should identify uncertainties and use harmonised terminology, where possible, based on internationally accepted terms. In its scientific work, the SCHEER relies on the Memorandum on Weight of Evidence (WoE) and uncertainties (SCHEER, 2018), *i.e.*, the search for relevant information and data for the SCHEER comprises of identifying, collecting and selecting possible sources of evidence in order to perform a risk assessment and/or to answer the specific questions being asked. For each line of evidence, the criteria of validity, reliability and relevance need to be applied and the overall quality must be assessed. In the integration of the different lines of evidence, the strength of the overall evidence depends on the consistency and the quality of the results. The weighing of the total evidence is then presented in a standardized format that classifies results of analysis for human and environmental risks in terms of:

- Strong weight of evidence: Coherent evidence from a primary line of evidence (human, animal, environment) and one or more other lines of evidence (in particular

- mode/mechanistic studies) in the absence of conflicting evidence from one of the other lines of evidence (no important data gaps)
- Moderate weight of evidence: good evidence from a primary line of evidence but evidence from several other lines is missing (important data gaps)
 - Weak weight of evidence: weak evidence from the primary lines of evidence (severe data gaps)
 - Uncertain weight of evidence: due to conflicting information from different lines of evidence that cannot be explained in scientific terms
 - Weighing of evidence not possible: No suitable evidence available

4.2 Background

4.2.1 SCENIHR (2015) Opinion – Summary on biological and health effects

4.2.1.1 Introduction

The SCENIHR Opinion of 2015 on “Potential health effects of exposure to electromagnetic fields (EMF)” investigated the whole frequency spectrum from static fields to 300 GHz. Here we repeat only the main findings that pertain to the frequency range of 100 kHz to several GHz. In 2015, when that Opinion was published, there were very few studies investigating potential biological, non-thermal effects of sub-THz fields. *In vivo* studies in these frequencies indicated mainly beneficial effects but did not address acute and chronic toxicity or carcinogenesis. *In vitro* studies on mammalian cells differed greatly with respect to irradiation conditions and endpoints under investigation. There were studies suggesting adverse health effects of exposure, but these had not been replicated. Some theoretical mechanisms had also been proposed, but there was no experimental evidence for them.

4.2.1.2 Cancer

The SCENIHR concluded that, overall, the epidemiological studies on mobile phone RF EMF exposure showed neither an increased risk of brain tumours, nor an increased risk for other cancers of the head and neck region. Some studies, however, had raised questions regarding an increased risk of glioma and acoustic neuroma in heavy users of mobile phones. The results of cohort and incidence time trend studies did not support an increased risk for glioma at that time (2015), while the possibility of an association with acoustic neuroma remained open. Epidemiological studies did not indicate increased risk for other malignant diseases, either, including childhood cancer.

4.2.1.3 Brain physiology and function

The SCENIHR found good evidence that mobile phone RF EMF exposure might affect brain activities as reflected by EEG studies during wake and sleep. However, given the variety of applied fields, duration of exposure, number of considered leads, and statistical methods, it was not possible at that time to derive firm conclusions. For event-related potentials and slow brain oscillations, results were inconsistent, as well. The relevance of the small physiological changes reflected on the EEG remains unclear and mechanistic explanation is still lacking. Moreover, at that time (2015), there was a lack of evidence that mobile phone RF EMF affected cognitive functions in humans, because effects had been found in individual studies (typically observed only in a small number of endpoints) but with little consistency between studies.

According to the SCENIHR, symptoms attributed to RF EMF exposure could sometimes cause serious impairments to a person’s quality of life. However, the SCENIHR concluded that RF EMF exposure was not causally linked to these symptoms, and this applied to the general public, to children and adolescents, as well as to people with idiopathic environmental intolerance attributed to electromagnetic fields (IEI-EMF).

Human studies on neurological diseases and symptoms showed no clear effect, but the evidence was limited.

4.2.1.4 Fertility, Reproduction, and Childhood Development

The SCENIHR Opinion concluded that there were no adverse effects on reproduction and development from RF fields at non-thermal exposure levels. Human studies on child development and behavioural problems presented conflicting results and methodological limitations. Therefore, the evidence of an effect is weak. Effects of exposure on foetuses from mother's mobile phone use during pregnancy were not plausible owing to extremely low foetal exposure. Studies on male fertility were of poor quality and provided little evidence.

4.2.2 ICNIRP (2020) Guidelines - Summary on biological and health effects

4.2.2.1 Introduction

The ICNIRP bases its guidelines on substantiated adverse health effects, which are different from biological effects. The ICNIRP considers that reported adverse effects of RF EMF health need to be independently verified, be of sufficient scientific quality and be consistent with current scientific understanding in order to be used for setting exposure restrictions. However, these requirements may be relaxed if there is sufficient additional knowledge (such as understanding of the relevant biological interaction mechanism) to confirm that adverse health effects are reasonably expected to occur. The ICNIRP considers the potential for different types of RF EMF exposure to adversely affect health, including sinusoidal (e.g., continuous wave) and non-sinusoidal (e.g., pulsed) signals, and both acute and chronic exposures.

4.2.2.2 Brain physiology and function

Most double-blind human experimental studies on cognitive performance, cerebral blood flow or event-related potential measures of cognitive function did not report an association with RF EMF exposure. A number of sporadic findings have been reported, which may be a result of the large number of statistical comparisons and occasional chance findings. However, studies analysing frequency components of the EEG have reliably shown that the 8–13 Hz alpha band in waking EEG and the 10–14 Hz "sleep spindle" frequency range in sleep EEG are affected by RF EMF exposure with specific energy absorption rates (SAR) <2 W/kg, but there is no evidence that these relate to adverse health effects. There is limited epidemiological research on higher cognitive function. There have been reports of subtle changes to performance measures with RF EMF, but findings have been contradictory and alternative explanations for observed effects are plausible.

A small portion of the population attributes non-specific symptoms to RF EMF exposure (IEI-EMF). Double-blind experimental studies have provided evidence that "belief about exposure" (e.g., the so-called "nocebo" effect), and not exposure itself, is the relevant symptom determinant. Epidemiological research has addressed potential long-term effects of radiofrequency EMF exposure from fixed site transmitters and devices used close to the body on both symptoms and well-being. Methodological concerns for such studies include selection bias, reporting bias, poor exposure assessment, and nocebo effects. In studies on mobile phone use, for example, it is difficult to differentiate between potential effects from RF EMF exposure and other consequences of mobile phone use, such as sleep deprivation when using the mobile phone at night. In summary, no reports of adverse effects of RF EMF exposures on symptoms and wellbeing have been substantiated, except for pain, which is related to elevated temperature at high exposure levels (from both direct and indirect exposure).

Several studies have included multiple cell lines and assessed functions such as intra- and intercellular signalling, membrane ion channel currents and input resistance, Ca²⁺ dynamics, signal transduction pathways, cytokine expression, biomarkers of neurodegeneration, heat shock proteins, and oxidative stress-related processes. However,

most of these studies have focused on *in vitro* experiments. There is no evidence of effects of RF EMF on physiological processes that impair human health.

4.2.2.3 Auditory, Vestibular, and Ocular function

A change in the ICNIRP (2020) Guidelines compared to the ICNIRP (1998) Guidelines is that the latest Guidelines do not provide a restriction to specifically account for “microwave hearing”, a biological phenomenon, which can result from brief RF pulses, in the order of several microseconds, exposing the head and causing thermoelastic expansion that is detected by sensory cells in the cochlea via the same processes involved in normal hearing. The decision of the ICNIRP not to provide an exposure restriction is based on the lack of evidence that microwave hearing in any realistic exposure scenarios can affect health.

Epidemiological research addressing sensory effects has concentrated on mobile phones. The research does not provide evidence that this exposure is associated with increased risk of tinnitus, hearing impairment, or other adverse effects on vestibular or ocular function of humans. Some evidence of superficial eye damage has been shown in rabbits at exposures of at least 1.4 kW/m².

4.2.2.4 Neuroendocrine System

The effect of RF EMF exposure on several hormones (including melatonin, growth hormone, luteinizing hormone, cortisol, epinephrine, and norepinephrine) has been assessed in a small number of studies, and no consistent evidence of effects has been observed. The lowest exposure level at which an effect of RF EMF on the neuroendocrine system has been observed is 4 W/kg (in rodents and primates), accompanied by a core temperature increase of 1°C or more. There is no evidence that this experimental finding translates to humans or that it is relevant to human health.

4.2.2.5 Neurodegenerative diseases

Due to ethical considerations, no human experimental studies exist for adverse effects on neurodegenerative diseases. It has been reported that exposure to pulsed RF EMF increased neuronal death in rats, which could potentially contribute to an increased risk of neurodegenerative disease. However, other studies have failed to confirm these results.

A cohort study has investigated potential effects of mobile phone use on neurodegenerative disorders. It reported reduced risk estimates for Alzheimer disease, vascular and other dementia, and Parkinson disease, which could be the result of reverse causation: Prodromal symptoms of the disease may prevent persons with early symptoms to start using a mobile phone. Results from studies on multiple sclerosis are inconsistent, with no effect observed among men, and a borderline increased risk in women, but with no consistent exposure-response pattern.

4.2.2.6 Cardiovascular system, Autonomic Nervous System, and Thermoregulation

Body heating from the absorption of RF energy can put the cardiovascular system under stress and may lead to adverse health effects. Numerous human studies have investigated indices of cardiovascular, autonomic nervous system, and thermoregulatory function, including measures of heart rate and heart rate variability, blood pressure, body, skin and finger temperatures, and skin conductance. Most studies indicate that there are no effects on endpoints regulated by the autonomic nervous system. Few epidemiological studies on cardiovascular, autonomic nervous system, or thermoregulation outcomes are available, and they have not demonstrated a link between RF EMF exposure and measures of cardiovascular health. Human health and the cardiovascular system are not compromised when the whole-body average SAR is below approximately 4 W/kg, with harm only found in animals exposed to whole-body average SAR substantially higher than 4 W/kg.

4.2.2.7 Immune System and Haematology

According to the ICNIRP, the few human studies that have been conducted have not provided any evidence that RF EMF affect health in humans via the immune system or haematology.

4.2.2.8 Fertility, Reproduction, and Childhood Development

Several animal studies have shown that exposure to RF EMF leading to a significant temperature increase can cause effects on reproduction and development, which include increased embryo and foetal losses, increased foetal malformations and anomalies, and reduced foetal weight at term. Such exposures can also cause a reduction in male fertility. Some studies have reported effects on male fertility at exposure levels below a whole-body average SAR of 4 W/kg, but these studies have had methodological limitations.

The ICNIRP mentions that some epidemiological studies have reported associations between RF EMF and sperm quality or male infertility, but these studies suffer from limitations in study design or exposure assessment. The few epidemiological studies performed about maternal mobile phone use during pregnancy have not shown any substantiated evidence that RF EMF exposure from maternal mobile phone use affects child cognitive or psychomotor development or causes developmental milestone delays.

4.2.2.9 Cancer

ICNIRP concludes that, despite the reports of effects of RF EMF exposure on several cellular and molecular processes (including cell proliferation, differentiation and apoptosis-related processes, proto-oncogene expression, genotoxicity, increased oxidative stress, and DNA strand breaks), there is no substantiated evidence of health-relevant effects.

Concerning animal studies on the effect of RF EMF exposure on carcinogenesis there have been reports of positive effects, but, in general, these studies either have shortcomings in methodology (e.g., untested animal models) or dosimetry, or the results have not been verified in independent studies.

The ICNIRP makes special note of the two recent animal studies investigating the carcinogenic potential of long-term exposure to RF EMF associated with mobile phones and mobile phone base stations: one by the U.S. National Toxicology Program and the other from the Ramazzini Institute in Italy. According to ICNIRP, although both studies used large numbers of animals, best laboratory practice, and exposed animals for the whole of their lives, they also have inconsistencies and important limitations that affect the usefulness of their results for setting exposure guidelines. Of particular importance is that the statistical methods employed were not sufficient to differentiate between radiofrequency-related and chance differences between treatment conditions; interpretation of the data is difficult due to the high body core temperature changes that resulted from the very high exposure levels used; and no consistency was seen across these two studies.

A large number of epidemiological studies of mobile phone use and cancer risk have been performed. Most have focused on brain tumours, acoustic neuroma and parotid gland tumours, although some studies have also been conducted on other types of tumours (leukaemia, lymphoma, uveal melanoma, pituitary gland tumours, testicular cancer, and malignant melanoma). With a few exceptions, the studies have used a case-control design and have relied on retrospectively collected self-reported information about mobile phone use history. Only two cohort studies with prospective exposure information are available. No cohort studies (which unlike case control studies are not affected by recall or selection bias) report a higher risk of glioma, meningioma, or acoustic neuroma among mobile phone subscribers or when estimating mobile phone use through prospectively collected questionnaires. The only study available on mobile phone use in children and brain tumour risk showed no increased risk of brain tumours.

Studies of exposure to environmental RF EMF, for example from radio and television transmitters, have not provided evidence of an increased cancer risk either in children or in adults. The ICNIRP concludes that no effects of RF EMF on the induction or development of cancer have been substantiated.

4.2.3 WHO Survey on Priority Outcomes

Given the large number of health endpoints that have been studied, WHO wanted to prioritise those that would merit systematic reviews (Verbeek *et al.*, 2021). They developed a survey listing of 34 health endpoints reported in the literature organised in eight broad categories:

- Health effects due to temperature increase
- Cancer
- Fertility and birth outcomes
- Symptoms affecting health
- Neurological impairments and disorders
- Neuroendocrine effects
- Immunological effects
- Haematological effects

They asked 300 RF EMF experts and researchers to prioritise these health effects for systematic review following the GRADE approach. They asked the respondents to use a scale from 1 to 9, where 1–3 meant unimportant, 4–6 meant important but not critical for decision-making and 7–9 meant critical for decision-making. For ratings above 3, the respondents were asked to provide a rationale for their rating based on one or more of the following five categories: (1) evidence from human studies, (2) evidence from animal studies, (3) evidence from *in vitro* studies, (4) possible public health impact, (5) public concern. An open-ended answer was also provided, where the respondent could list other outcomes not included in the list. To include an outcome in a systematic review, the WHO team used a cut-off at around 30% of the participants answering that this outcome was critical for decision making.

Of the 300 RF EMF experts queried, 164 (54%) responded to the online questionnaire in the period between 29 May 2018 and 24 June 2018. They rated cancer, heat-related effects, adverse birth outcomes, electromagnetic hypersensitivity, cognitive impairment, adverse pregnancy outcomes and oxidative stress as the most critical outcomes regarding RF EMF exposure. WHO has recently commissioned systematic reviews on ten of these outcomes through an open call for expression of interest. A selection committee convened by WHO ranked the teams based on the criteria related to qualifications and skills mentioned in the calls, including expertise in systematic review methodology, RF EMF expertise and expertise in the outcome of interest. All team members were assessed for conflicts of interest, as per WHO's requirements. **The protocols for the systematic reviews, which have already been published in Elsevier's *Environment International*, include:**

- Henschenmacher, B., Bitsch, A., de las Heras Gala, T., Forman, H. J., Fragoulis, A., Ghezzi, P., Kellner, R., Koch, W., Kuhne, J., Sachno, D., Schmid, G., Tsaïoun, K., Verbeek, J., & Wright, R. (2022). The effect of radiofrequency electromagnetic fields (RF EMF) on biomarkers of oxidative stress in vivo and in vitro: A protocol for a systematic review. *Environment International*, 158, 106932. <https://doi.org/10.1016/J.ENVINT.2021.106932>
- Pophof, B., Burns, J., Danker-Hopfe, H., Dorn, H., Egblomassé-Roidl, C., Eggert, T., Fuks, K., Henschenmacher, B., Kuhne, J., Sauter, C., & Schmid, G. (2021). The effect of exposure to radiofrequency electromagnetic fields on cognitive performance in human experimental studies: A protocol for a systematic review. *Environment international*, 157, 106783. <https://doi.org/10.1016/j.envint.2021.106783>.
- Rössli, M., Dongus, S., Jalilian, H., Feychting, M., Eyers, J., Esu, E., Oringanje, C. M., Meremikwu, M., & Bosch-Capblanch, X. (2021). The effects of radiofrequency

electromagnetic fields exposure on tinnitus, migraine and non-specific symptoms in the general and working population: A protocol for a systematic review on human observational studies. *Environment international*, 157, 106852.

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4.2.4 Differences in methodology from SCENIHR (2015)

In the six-year period between the 2009 and 2015 SCENIHR Opinions, about 2700 articles on RF and health effects were published, according to a search in the EMF-PORTAL (<https://www.emf-portal.org/en>), which is the internet information platform of the RWTH Aachen University summarising systematically scientific research data on the effects of EMF. (All information is made available in both English and German.) In the six-year period between 2015 and 2020, a further 3270 articles were published. Due to the increased number of meta-analyses and systematic reviews, it was decided to address the Terms of Reference of the current Opinion using mainly meta-analyses and systematic reviews, since they can efficiently handle the heterogeneity of individual studies resulting in an improved reliability of the level of evidence. When there was a lack of meta-analyses and/or systematic reviews on a biological/health effect, other reviews, like narrative reviews, were used. It was necessary for these reviews to have been performed with a methodology similar to the WoE approach of SCHEER (SCHEER, 2018). Single research

papers that fulfilled the required quality criteria were only used in exceptional cases (e.g., wide coverage of the general population), as for biological/health effects, mainly to strengthen the WoE in risk assessment (SCHEER, 2018).

5 ASSESSMENT

5.1 Exposure to RF EMF

5.1.1 Wireless communication technologies

5.1.1.1 Typical exposure of population

In a systematic literature review, Sagar *et al.* (2018) assessed RF EMF exposure in everyday microenvironments in Europe. The authors systematically searched the ISI Web of Science for relevant literature published between 30 April 2015 and 1 January 2000. Twenty-one published studies met their eligibility criteria, of which 10 were spot measurements studies, five were personal measurement studies with trained researchers (microenvironmental), five were personal measurement studies with volunteers and one was a mixed methods study combining data collected by volunteers and trained researchers. The mean total RF EMF exposure for spot measurements in European "Homes" and "Outdoor" microenvironments was 0.29 and 0.54 V/m, respectively. In the studies of personal measurements by trained researchers, the mean total RF EMF exposure was 0.24 V/m in "Home" and 0.76 V/m in "Outdoor". In the personal measurement studies with volunteers, the population-weighted mean total RF EMF exposure was 0.16 V/m in "Homes" and 0.20 V/m in "Outdoor". Among all European microenvironments in "Transportation", the highest mean total RF EMF of 1.96 V/m was found in trains in Belgium during 2007 (more than 95% of exposure was contributed by uplink). There were considerable differences between studies according to the type of measurements procedures, which prevented cross-country comparison or evaluating temporal trends.

Jalilian *et al.* (2019) updated the systematic review mentioned above. They reported that mean RF EMF values in homes, schools and offices were between 0.04 and 0.76 V/m. Mean outdoor exposure values ranged from 0.07 to 1.27 V/m, with downlink signals from mobile phone base stations being the most relevant contributor to environmental EMF. Exposure tended to increase with increasing urbanity. The values of EMF exposure in public transport (bus, train and tram) and cars were between 0.14 and 0.69 V/m. The highest levels, up to 1.97 V/m, were measured in public transport stations with downlink as the most relevant contributor. In line with previous studies, RF EMF exposure levels were highest in the transportation systems, followed by outdoor and private indoor environments. According to the authors, there has been no noticeable increase in everyday RF EMF exposure since 2012, despite increasing use of wireless communication devices.

In an attempt to assess RF EMF exposure in the general population, van Wel *et al.* (2021) took an integrative approach (distinguishing the contribution of various sources) for individual exposure assessment at the organ scale. They developed the Integrated Exposure Model (IEM), which combines energy absorbed due to use of and exposure to RF EMF sources and applied it to a sample of the general population to derive population RF EMF estimates. The IEM used SAR transfer algorithms to provide RF EMF daily dose estimates (mJ/kg/day) using source-specific attributes (e.g., output power, distance), personal characteristics and usage patterns. Information was obtained from an international survey performed in four European countries with 1755 participants. The model-obtained median whole-body and whole-brain doses were 183.7 and 204.4 mJ/kg/day, respectively. Main contributors to whole-brain dose were mobile phone near the head for calling (2G networks) and far-field sources, whereas the latter together with multiple other RF EMF sources were main contributors for whole-body dose. For other anatomical sites, 2G phone calls, mobile data and far-field exposure were important contributors.

Using an integrated exposure model, Birks *et al.* (2021) estimated the daily RF dose in the brain (whole-brain, cerebellum, frontal lobe, midbrain, occipital lobe, parietal lobe, temporal lobes) and the whole body in 8358 children (ages 8–12) and adolescents (ages 14–18) from the Netherlands, Spain, and Switzerland during 2012–2016. The integrated model estimated RF dose from near-field sources (digital enhanced communication technology (DECT) phone, mobile phone, tablet, and laptop) and far-field sources (mobile phone base stations via 3D modelling or RF measurements). The results of the study show that adolescents were more frequent mobile phone users and experienced higher modelled RF doses in the whole-brain (median 330.4 mJ/kg/day) compared to children (median 83.7 mJ/kg/day). Children spent more time using tablets or laptops compared to adolescents, resulting in higher RF doses in the whole-body (median whole-body dose of 81.8 mJ/kg/day) compared to adolescents (41.9 mJ/kg/day). Among brain regions, temporal lobes received the highest RF dose (medians of 274.9 and 1786.5 mJ/kg/day in children and adolescents, respectively) followed by the frontal lobe. In most children and adolescents, calling on 2G networks was the main contributor to RF dose in the whole-brain (medians of 31.1 and 273.7 mJ/kg/day, respectively). This study of RF dose to the brain and body of children and adolescents shows that mobile phone calls on 2G networks are the main determinants of brain dose, especially in temporal and frontal lobes, whereas whole-body doses are mostly determined by tablet and laptop use.

Since pattern of use is the main determinant for the dose produced by mobile phone devices, recent studies have also focused on the exposure assessment of specific groups by examining use patterns within these groups. Langer *et al.* (2017) reported the pattern of cellular phone use among young people in 12 countries during the Mobi-Expo study. Participants in the study were 534 young people (10–24 years) who installed a specifically designed software application on their smartphones to collect data on the use of wireless telecommunications devices (Table 1). The role of gender, age, maternal education, calendar period, and country was evaluated through multivariate models mutually adjusting for all variables. Call number and duration were higher among females compared to males (geometric mean (GM) ratio 1.17 and 1.42, respectively), among 20–24 year-olds compared to 10–14 year olds (GM ratio 2.09 and 4.40, respectively), and among lowest compared to highest social classes (GM ratio 1.52 and 1.58, respectively). The number of SMS was higher in females (GM ratio 1.46) and the middle-age group (15–19 year-olds: GM ratio 2.21 compared to 10–14 year olds) and decreased over time. Mobile data use was highest in the oldest age group, whereas Wi-Fi use was highest in the middle-age group. Both data and Wi-Fi use increased over time. Large differences in the number and duration of calls, SMS, and data/Wi-Fi use were seen by country, with country and age accounting for up to 50% of the variance. Hands-free and laterality of use did not show significant differences by sex, age, education, study period, or country.

Table 1. Data on the use of wireless telecommunication devices (adapted from Langer *et al.*, 2017)

Variable	Mean (SD)	Median (IQR)
Number of calls per week	30.6 (32.0)	20.9 (29.0)
Total duration in minutes per week	60.8 (80.1)	34.3 (65.3)
Number of SMS sent and received per week	106.3 (251.7)	26.6 (80.5)
Data use per week (Mb)	121.4 (246.8)	36.1 (116.4)
Wi-Fi use per week (Mb)	768.1 (1352.4)	249.2 (733.5)
% hands-free of total call time	18.8 (20.3)	10.6 (18.1)
% right-handed laterality of call time near head	63.8 (25.3)	70.8 (37.2)

5.1.1.2 Dosimetry in epidemiological studies

The problem of dosimetry in epidemiological studies was also highlighted in the SCENIHR Opinion of 2015. Here we summarize the studies that have since been published.

It is difficult to interpret the epidemiological studies on health effects from mobile phone use because of uncertainties in the exposure assessment. A newly developed smart phone application (XMobiSense) is used to validate self-reported mobile phone use and behaviour among adults in (Goedhart *et al.*, 2015). XMobiSense was used by 107 adults recruited in the Netherlands. Participants with no (n=5) or less than 3 weeks (n=6) of data recorded by the app were excluded from the analyses, leaving a final sample of 96 participants for the analyses. For participants with a long period of data recording (n=5), data were truncated at 6 weeks. Recorded outgoing calls included both successful and unsuccessful (ie, no connection) calls, while the self-reported information most likely only included the successful calls. Sensitivity analyses were performed to explore the impact of excluding recorded outgoing calls of 10 s or less (potentially unsuccessful). Recorded data transfer was calculated in megabytes (MB) per week, while self-reported total time spent using the Internet was calculated in minutes per week. The recorded variables laterality (right/left side), hands-free device usage and 'other hands-free usage' were recalculated from seconds per call to percentage over the total call time, thereby accounting for call duration.

An important finding was the significant impact of the level of phone use on the recall, that is, participants with a higher level of reported phone use were more likely to overestimate their number and duration of calls, while underestimation was more likely among participants who reported lower levels of use. The same trend was observed in the INTERPHONE study.

This has important implications for epidemiological studies on mobile phone use, as it will most likely lead to an underestimation of the risk, if any, for adverse health outcomes. RF dose models based on the recalled number and duration of calls should therefore account for differential recall errors by level of phone use.

Although the location of RF exposure from data transfer (frontal lobe of the brain and/or other parts of the body) and the distance to the body is different from voice calls, the enormous increase in data transfer due to the arrival of smart phones makes it an important source to consider in defining RF dose from mobile phones. People are often unaware of the data transfer on their mobile phone, possibly by applications that run in the background (push messages).

A study was devoted to recall of mobile phone usage (Goedhart *et al.*, 2018). The authors observed differences in recall by country, age, maternal educational, and amount of reported phone use. Differences by country were not observed in the CEFALO validation study (2 countries) (Aydin *et al.*, 2011), but were seen in the Interphone validation study among adults (11 countries; (Vrijheid *et al.*, 2006a, Vrijheid *et al.*, 2006b)). In the Goedhart *et al.* study, where, as in the Interphone one, the same protocol and software app were applied in each country, the authors cannot easily explain the different ratios between self-reported and recorded use (ranging from 0.31 to 0.96 for number of calls and from 0.56 to 3.61 for duration of calls) found between the countries, other than cultural differences in the way people recall their use. It might be important to take these differences into account in future studies and in exposure studies.

Toledano *et al.* (2018) investigated the validity of self-reported mobile phone use in a subset of 75 993 adults from the international prospective cohort study of mobile phone users and health (COSMOS). Agreement between self-reported and operator-derived mobile call frequency and duration for a 3-month period was assessed using Cohen's weighted Kappa (κ). Sensitivity and specificity, of both self-reported high (≥ 10 calls/day or ≥ 4 h/week) and low (≤ 6 calls/week or < 30 min/week) mobile phone use, were calculated, as compared to operator data. For users of one mobile phone, agreement was fair for call frequency ($\kappa=0.35$, 95% CI: 0.35, 0.36) and moderate for call duration ($\kappa=0.50$, 95% CI: 0.49, 0.50). Self-reported low call frequency and duration demonstrated

high sensitivity (87% and 76% respectively), but for high-call frequency and duration sensitivity was lower (38% and 56% respectively), reflecting a tendency for greater underestimation than overestimation. Validity of self-reported mobile phone use was lower in women, younger age groups and those reporting symptoms during/shortly after using a mobile phone. This study highlights the ongoing value of using self-report data to measure mobile phone use. There is evidence that for young people, Wi-Fi is an important alternative exposure source that also needs to be considered (Mireku *et al.*, 2018). Furthermore, compared to continuous scale estimates used by previous studies, categorical response options used in COSMOS appear to improve validity considerably, most likely by preventing unrealistically high estimates from being reported.

The issue of epistemic uncertainty is reviewed and interpreted in the context of the MoRPhEUS, ExPOSURE and HERMES cohort studies which investigate the effect of radiofrequency electromagnetic radiation from mobile phones on memory (Brzozek *et al.*, 2018). These uncertainties are derived from a wide range of sources including human error, such as data transcription, model structure, measurement and linguistic errors in communication. Research into this field has found inconsistent results due to limitations from a range of epistemic sources. Potential analytic approaches are suggested based on quantification of epistemic error using Monte Carlo simulation. It is recommended that future studies investigating the relationship between radiofrequency electromagnetic radiation and memory performance pay more attention to the treatment of epistemic uncertainties as well as further research into improving exposure assessment. Use of directed acyclic graphs is also encouraged to display the assumed covariate relationship.

On the issue of dosimetry for epidemiological studies on potential health effects of mobile phones, the SCHEER can conclude that

- the assessment of the exposure should be based on objective measurements, not on the personal recalls or provider's information originating mainly from the bills paid (unsuccessful calls are not paid but the EMF emission is there while the customer waits) and consider all sources of exposure, e.g., WiFi and ELF-EMF (Calderón *et al.*, 2022);
- estimation of the EMF dose received should reflect the differences observed (both self-reporting and the app usage – the solid angle of the EMF flux depends on the device location with respect to human body/head);
- validity can be improved considerably by preventing unrealistically high estimates from being considered from self-reports;
- epistemic or reducible uncertainties can also affect the total error in results in addition to statistical variability usually considered as the main source of errors; these uncertainties must be derived from a wide range of sources including human error, such as data transcription, model structure, measurement and linguistic errors in communication.

5.1.2 Exposure of workers

Two reviews of studies assessing exposure to RF EMF at the workplace have been published. The first one concerned medical sources (Stam and Yamaguchi-Sekino, 2017) and showed that near equipment for diathermy, hyperthermia and electrosurgery exposure to RF EMF can exceed the action level for thermal effects in the Directive 2013/35/EU, assuming exposure at the maximum level lasts for more than 6 minutes. The action levels for contact and limb currents can also be exceeded in diathermy. It should be noted that the SAR in the worker's body was not calculated in any of the studies that reported magnetic flux density values above the thermal action level. The second review (Stam, 2022) categorized exposure according to the industrial application/sector: dielectric heating (plastic welding), security and RFID, plasma devices, broadcasting and telecommunications, microwave drying or heating, radar and other. The results of this systematic literature review show that the action levels and exposure limit values for RF

EMF defined in the Directive 2013/35/EU can be exceeded, in varying proportions, for maximum exposures in working environments of all industrial applications but only rarely for microwave drying or heating and radar. It should be noted that in the above reviews only the maximum exposures at the workplace per frequency per publication are listed as an indication of worst-case conditions. These exposures were assessed at a fixed height and did not take account spatial averaging, giving a conservative estimate of exposure. Therefore, these maximum exposures are not necessarily representative of the majority of exposures and may not always represent good working practice. On the other hand, it cannot be excluded that even higher exposures are possible in working environments or scenarios that are not covered by the publications included in these reviews (Stam, 2022).

5.1.3 Exposure from emerging technologies

Smart meters and sensor networks (the Internet of Things, IoT) are becoming increasingly popular in all environments. Measurements of the RF EMF emitted from such devices in the residential environment have shown that residential levels of RF EMF exposure are low. Some residential devices can significantly increase the exposure if their duty cycles are high enough (>10%), especially when held or used close to the body. Individual smart meters, on the other hand, contribute little in general, despite emissions of up to 20 V/m at 50 cm, due to their low duty cycles (maximum 1%) and locations (Aerts *et al.*, 2019). So, in addition to the continuous exposure to environmental EMF, wireless access points (due to frequent use), mobile phones and other personal communication devices (due to their use close to the body) continue to represent the bulk of the RF EMF exposure in the smart home.

The fifth generation (5G) of broadband cellular networks technology is a key enabling technology for the proliferation of the IoT (Dangi *et al.*, 2022). It uses devices within frequency range 1 (FR1) (< 6 GHz) and frequency range 2 (FR2) (24 – 54 GHz), that is a range of higher frequencies than those used in 4G (fourth generation) networks. The result is that some 5G signals do not travel large distances (over a few hundred meters), unlike 4G or lower frequency 5G signals (sub 6 GHz). The use of the higher frequency band (FR2) requires positioning 5G base stations every few hundred meters in dense urban areas, where resources such as power and data backhaul links are available.

Millimetre waves are very weak in their ability to connect two devices, which is why 5G needs something called 'small cells' to give full, uninterrupted coverage. Small cells are essentially miniature cell towers that would be placed 250 meters apart throughout cities and other areas needing coverage. The small cells are necessary as emissions (or signals) at this higher frequency/shorter wavelength have more difficulty passing through solid objects and are even easily intercepted by rain. The small cells could be placed on anything from trees to streetlights to the sides of businesses and homes to maximise connection and limit 'dead zones' (areas where connections are lost) (Al-Falahy & Alani, 2017).

Simulations on the deployment of 5G networks have shown that the exposure of the population could increase for the period of time they work in conjunction with previous generation networks (El-Hajj and Naous, 2020; ANFR, 2020) but still remain well below the reference levels of the Council Recommendation for the NR FR1 band.

The fastest 5G speeds would be in the millimetre wave band and can reach 4 Gbit/s with carrier aggregation and MIMO (multiple-input multiple-output) technology.

Another novel feature in 5G that triggers health concerns among the public is massive MIMO/beamforming adopted in some 5G Base Stations (BS). In fact, MIMO and beamforming techniques have also been considered in 4G networks. However, there are two substantial differences compared to previous networks, *i.e.*, maximum equivalent isotropically radiated power (EIRP) and dynamic pencil beam forming with a larger number of antenna elements. The maximum rated power of 5G macro cell BS (FR1) is typically around 200-300 W. This is similar to the power used by 4G BS. Since the radiation pattern with massive MIMO varies over time and space, traditional assessment of compliance procedures to quantify the exposure can be misleading. These classical methods rely on

conservative assumptions, e.g., all the users are in the same location that coincides with the testing point. These assumptions over-estimate the exposure from 5G BSs, leading to a lower maximum allowable power and a larger exclusion zone (Baracca *et al.*, 2018; Chiaraviglio *et al.*, 2021). However, stochastic dosimetry approaches offer a solution to exposure characterisation in 5G MIMO networks (Al Hajj *et al.*, 2020; Bonato *et al.*, 2021). Recently, the International Electrotechnical Commission (IEC) has published a standard for evaluating human exposure in the vicinity of base stations, that considers both MIMO and beamforming technologies (IEC, 2022).

5.1.4 Factors affecting exposure to RF EMF

The factors that determine exposure to RF EMF (mainly from cellular networks) have been detailed with the introduction of the Exposure Index (EI) concept, which looks at the exposure of a population during a given time frame in a given area incurred by a wireless cellular network as a whole, aggregating downlink (DL) exposure induced by base stations and access points and the uplink (UL) exposure incurred by all individual wireless communication devices, including devices operated by other users nearby. To assess the realistic exposure of a population, many factors need to be considered: age (adult and child exposure are different), posture, usage, technology, environment, and more (Varsier *et al.*, 2015).

The EI is given by the formula:

$$EI^{SAR} = \frac{1}{T} \sum_t^{N_T} \sum_p^{N_P} \sum_e^{N_E} \sum_r^{N_R} \sum_c^{N_C} \sum_l^{N_L} \sum_{pos}^{N_{pos}} f_{t,p,e,r,l,c,pos} \left[\sum_u^{N_U} d^{UL} \bar{P}_{TX} + d^{DL} \bar{S}_{inc} + d^{DL,close-devices} S_{inc}^{DL,close-devices} \right] \left[\frac{W}{kg} \right]$$

where:

N_T is the number of Time periods within the time frame T, e.g., a single day;

N_P is the number of Population categories;

N_E is the number of Environments;

N_R is the number of Radio access technologies (RAT);

N_C is the number of Cell types;

N_U is the number of Usages with devices;

N_L is the number of user Load profiles;

N_{pos} is the number of considered Postures;

\bar{P}_{TX} (W) is the mean transmission (TX) power by the users' devices during period t , in usage mode u , connected to RAT r , in environment e . A TX power values map is given for the whole considered geographical area and the average value is taken into account for EI evaluation;

\bar{S}_{inc} (W/m²) is the mean incident power density on the human body during period t , induced by RAT r , in environment e . A distribution of the incident power density for the whole considered geographical area is considered and the average value over this area is taken into account for EI evaluation;

$S_{inc}^{DL,close-devices}$ (W/m²) is incident power density on the human body during period t , induced by a wireless device connected to RAT r of a user in proximity to environment e . This term will be significant for people in proximity of users of a wireless device; for instance, in a crowded meeting room, in public transportation, etc.;

d^{UL} (J/kg/W), $d^{DL,close-devices}$ (J/kg/(W/m²)) and d^{DL} (J/kg/(W/m²)) are normalised raw dose values for UL, DL from the user in the proximity, and DL from base stations and access points, respectively, all multiplied by time spent in configuration; and $f_{t,p,e,r,l,c,pos}$ is the

fraction of the total population that corresponds to population category p , user load profile l , in posture pos , connected to RAT r , for cell type c , in environment e , during time period t .

In more detail, for a given geographical area, EI takes the following into account: time period: configurations of the network and of usages depend on time of day (power density will be higher during rush hours); population: segmented in different categories, as different population categories will have different life segmentations and different usages of wireless devices, e.g., children (less than 15 years old), young people (15–29), adults (30–59), and seniors (60 and older); different user load profiles: wireless device usages will be dramatically different depending on the profile, and as repartitions of user profiles will also differ depending on the population category (e.g., heavy, medium, light, or non-users); environment: indoor (office, home), outdoor, and in transportation (bus, car, subway etc.); different available Radio Access Technologies (RATs): e.g., 2G (900 and 1800 MHz), 3G, 4G, WiFi; the number of considered RATs depends on the scenario; different cell types: macro, micro, pico, and femto cells; the accessibility to different cell types depends on scenario; posture: sitting, standing; different body postures will lead to different absorption rates in the human body; and usage: a device (e.g., mobile, PC, laptop) and its usage (e.g., voice call, data) (Varsier *et al.*, 2015).

As technology progresses, the spectrum of wireless devices broadens (e.g., wireless virtual reality devices) (Liorni *et al.*, 2020), more information is collected on 'life segmentation' (*i.e.*, people's activities and the way they spend their time) and other factors (e.g., sex/gender) that define the usage of these wireless devices (van Wel *et al.*, 2021). It is clear by now that near-field exposure is related not only to the RAT but also to the mobile application (*i.e.*, the software) running on the wireless terminal (Paljanos *et al.*, 2016). At the same time the computational and experimental techniques for assessing exposure to EMF are advancing, allowing for increasingly accurate exposure characterisation and dosimetry (Hirata *et al.*, 2021).

5.2 Interaction mechanisms¹⁵

5.2.1 Thermal effects

Tissue heating is an important effect of RF EMF exposure of biological organisms that has been unequivocally demonstrated. The amount and distribution of the energy absorbed in a biological object exposed to RF energy is related to the internal electric and magnetic fields. As the incident wave penetrates a biological object, the fields interact at the various tissue interfaces resulting in a complex distribution of the local fields. These internal fields are related to a number of parameters including frequency, dielectric properties of the tissues, geometry and orientation of the object with respect to the incident field vectors, and whether the exposure is in the near or far field of the source. The resulting distribution of energy can be described in terms of the specific absorption rate (SAR), *i.e.*, the time derivative of the incremental energy absorbed by (dissipated in) an incremental mass contained in a volume element of a given density (Adair and Petersen, 2002).

As frequency increases, the penetration depth of the field decreases¹⁶. For muscle (tissues with high water content) it reduces from about 3.5 cm at 1 GHz to about 0.3 mm at 100 GHz (millimetre waves). As a result, energy absorption becomes superficial and can lead to surface heating. Heat transport near the skin surface is dominated by thermal conduction into the tissue due to the high temperature gradients at the skin, and only a small fraction of the absorbed energy is lost back into the surrounding environment. The increase in surface temperature is determined by the rate of heat generation in the layer near the surface where most of the RF radiation is absorbed, the rate of diffusion of heat

¹⁵ An interaction mechanism is the biophysical way RF EMF interacts with living matter, and which can be experimentally demonstrated.

¹⁶ Penetration depth in a medium is the distance from the boundary of a medium to the point at which the field strengths have been reduced to $1/e$ of their initial boundary value in the medium.

out of the region of high SAR (a relatively fast process due to the small thickness of this layer), and the rate of removal of heat to the body core by blood perfusion (a much slower process). Heat rapidly diffuses from the thin layer where most RF energy at millimetre wave frequencies is absorbed, but if energy is pushed into it sufficiently rapidly (*i.e.*, if the incident power density is high), significant temperature increases can develop (Hirata *et al.*, 2021). Short pulses of millimetre waves at high fluence can induce large transient increases in surface temperature (Foster *et al.*, 2018; Neufeld and Kuster, 2018) as can pulsed narrow beams (Neufeld *et al.*, 2020).

It has been shown that the surface temperature elevation strongly correlates the transmitted or absorbed power density (APD) across the millimetre wave range (30–300 GHz), whereas the SAR remains a good metric for skin temperature rise for exposure at frequencies lower than 3 GHz (Li *et al.*, 2019).

5.2.2 Cellular interaction mechanisms

The preamble to the IARC Monographs on the Identification of Carcinogenic Hazards to Humans, has given new emphasis and highlighted the importance of mechanistic studies in corroborating evidence and providing biological plausibility to other types of studies, and the possibility that they could provide strong evidence in case of consistent findings demonstrated across a number of different systems and in different species. Given the increasing emphasis on mechanistic data, the IARC Preamble also recognises the importance of evaluating the quality of the study design, exposure assessment methods and biological assay validity (IARC, 2019).

Several studies have investigated and hypothesized potential cellular mechanisms that can operate at RF exposure levels found in the everyday environment (SCENIHR, 2015). Here we focus on *in vitro* studies that can provide essential information on specific cell properties, and allow a more rapid, cost-effective and well-controlled approach to molecular and mechanistic studies than conventional laboratory animal models. Several cellular endpoints have been analysed as presented in a recent metanalysis by Halgamuge *et al.* (2020) which included data from *in vitro* studies published between 1990 and 2015 and investigating effects of weak RF EMF from mobile phones.

To date the most investigated critical conditions that could provide evidence of a mechanism by which RF exposure might affect human health are oxidative stress, genotoxicity, epigenetics effects, effects on calcium signalling pathways and on apoptosis. It is worth mentioning that for these studies to be effective in providing mechanistic understanding, methodological quality is mandatory but it still is a critical issue since the majority of studies do not comply with quality criteria which include adequate attention to dosimetry, inclusion of sham control, positive control, blind evaluation and temperature control (Kuster and Schönborn, 2000; Zeni and Scarfi, 2012; Simko *et al.*, 2016; Vijayalaxmi and Foster, 2021). Moreover, in the majority of review papers, the study inclusion criteria did not take into account the aspects of quality of experimental methods, which have been widely demonstrated to affect the results (Simko *et al.*, 2016; Vijayalaxmi and Foster, 2021).

5.2.2.1 Oxidative stress

Oxidative stress is a critical condition that could provide evidence of a mechanism by which RF exposure might affect human health. It occurs when the production of oxidants overrides the antioxidant capability of the cells. As a result, the oxidants react with macromolecules like proteins, lipids and nucleic acids giving rise to alteration in cellular functions related to several diseases like cancer and neurodegenerative diseases.

In many studies, experimental evidence has been accumulated that RF exposure may affect biomarkers of oxidative stress at exposure level close to or above the ICNIRP guidelines but there are no systematic reviews or meta-analysis available. In 2020, the WHO commissioned a systematic review of *in vivo* and *in vitro* experimental studies to

analyse and synthesise the available evidence on oxidative stress induced by RF exposure (see 4.2.3 above). Henschenmacher *et al.* (2022) in the publication of their systematic review protocol explain that oxidative stress is a state or a mechanism that is not a health outcome per se, but it could provide evidence of a mechanism by which RF EMF exposure might affect health. Due to the lack of systematic reviews and meta-analyses, we focus here on narrative reviews. Most of the identified narrative reviews do not apply a systematic literature search and include studies that do not adhere to basic quality criteria defined a priori and have a high risk of bias. Therefore, these reviews are not informative enough to conclude on oxidative stress mechanisms induced by RF exposure, and thus are not useful for the purpose of this Opinion.

The most comprehensive and informative narrative review is the one co-authored by Schuermann and Mevissen (2021). It includes information sources and, although the authors did not set quality criteria for the inclusion of studies, they discussed the importance of sham control and temperature control together with the quality of the dosimetry analysis to determine the actual SAR level experienced by the animals and the cultured cells. This review reports on key experimental findings on oxidative stress deriving from *in vivo* (animals, 70 studies) and *in vitro* (cells, 56 studies) studies published in the last decade. The results are discussed in the context of molecular mechanisms that can be relevant for human health. The authors grouped the studies for the impact on nervous system, on reproduction, and on blood and immune system. Also, a correlation with functional analysis is included to look for temporary or persistent effects. They concluded on the increased oxidative stress due to RF EMF as from the majority of animal studies and from half of the cellular studies, but they pointed out that some studies were subjected to methodological uncertainties or weakness or were not very comprehensive regarding exposure time, SAR level, number and quantitative analysis of the endpoints analysed. The trend the authors evidenced is that, even at low dose exposure, RF can affect cellular oxidative balance that can also lead to an adaptation mechanism after a recovery phase, thus not leading to health effects. Authors evidenced that standardised conditions are mandatory to better understand and confirm their conclusions.

5.2.2.2 Genetic and epigenetic effects

The DNA integrity and epigenetic mechanisms (the regulation of genes by environmental influence) are crucial for human health. Genotoxicity is one of the key biological indicators of carcinogenicity and the most common characteristics of established carcinogens (Smith and Guyton, 2020), while the epigenome is well known to be susceptible to every kind of environmental influence including the exposure to non-mutagenic carcinogens (Feil and Fraga, 2012). The biological effects of RF EMF on epigenetic factors are less investigated with respect to the genotoxic effects and, in both cases, there are no systematic reviews available in the period of interest of this Opinion.

Genotoxicity is mainly evaluated by analysing the effects on primary (chromosomal aberrations, micronuclei, sister chromatid exchanges, aneuploidy, or mutation) and secondary (single and double strand breaks, chromatin condensations) endpoints, which are biomarkers of irreversible and repairable damage, respectively.

From recent narrative review papers, it appears that results are mainly inconsistent, with many experimental (*in vitro* and *in vivo*) studies showing significant genotoxicity and others reporting absence of an effect from RF exposure at intensities similar to those in the public environment. The effects, when present, are a function of frequency, amplitude, and modulation, and in most cases are not replicated in follow-up studies. (Lai, 2021; Karidipis *et al.*, 2021a; Kocaman *et al.*, 2018; Jagetia, 2022).

Most of these review papers also highlight the importance of the methodological quality of the experimental studies. Thus, in order to consider the available genotoxicity results concerning exposure to RF EMF, it is important to check if quality control measures were included in the experiments, as the absence of the latter introduce a methodological bias. The SCHEER noted that based on the review by Vijayalaxmi and Prihoda (2019), the

percentages of publications reporting no significant difference (NSD) in genetic damage between RF-exposed and control cells were positively correlated with the increase in the number of quality control measures/score adopted in the investigations. On the other hand, the number of publications reporting increased genetic damage (INC) in RF-exposed animal and human cells was negatively correlated with the number of quality control measures/score used in the investigation. The meta-analysis data also highlighted the existence of publication bias. Moreover, the comprehensive review of quality assessment made in this study also revealed that when exposure to RF energy was at a high SAR level, there was increased damage due to a thermal phenomenon or due to the presence of highly localised hot spots.

The same authors, in a previously carried out meta-analysis, showed that the mean indices for chromosome aberration, micronuclei, and sister-chromatid exchanges in RF-exposed and sham-exposed/unexposed controls were within the spontaneous levels reported in a large database. Studies, published from 1990 to 2011, addressing genetic damage in animal and human cells exposed *in vitro* to RF EMF were included in that meta-analysis (Vijayalaxmi and Prihoda, 2012).

The SCHEER noted that in 2021 a protocol for a quality-based systematic review of experimental studies investigating genotoxic effects induced by RF EMF in *in vitro* cell models was published (Romeo *et al.*, 2021). It is worth noting that WHO did not commission this protocol, but the systematic review that will follow will surely contribute to providing a mechanistic understanding with respect to the genotoxic potential of RF EMF. The importance of conducting genetic damage investigations is supported by the fact that most genotoxic agents are carcinogens. Since no single genetic damage test is capable of detecting all genotoxic agents, the recommendation is to conduct a battery of *in vitro* and *in vivo* tests for genetic damage assessment (Sasaki *et al.*, 2000).

5.2.2.3 Calcium signalling and voltage-gated channels

A role for calcium as a molecular mechanism underlying the interaction of RF EMF has been hypothesised due to the involvement of calcium signalling pathways in the regulation of many essential cellular processes.

A well-conducted narrative review has been co-authored by Wood and Karidipis (2021). As a result of a transparent bibliographic search, 30 *in vitro* and *in vivo* papers dealing with the effect of RF exposure on Ca^{2+} levels have been analysed to see whether a consistent picture can be drawn. To analyse effects in the single papers, the authors computed the effect size (ES) defined as the difference between the means of the exposed and sham groups divided by the standard deviation of the sham group. Moreover, they assigned a quality score to each paper based on the attention given to aspects like dosimetry, sham control, positive controls and blinding. In 60% of the analysed papers, a change in intracellular calcium was reported with the number of papers reporting an increase approximately equal to the papers reporting decrease. The greatest proportion (40%) reported no changes. Analysis of effects size (ES) vs. carrier frequency and modulation type did not evidence any significant relationship. The majority of the studies with a higher quality score did not report an effect. There was no consistent evidence of PD or SAR windows although the authors pointed out that estimation of exposure is to be used with caution since in some cases the procedure for exposure levels is not clearly described. Moreover, they evidenced that the direction of the effect moved from cytoplasmic loss to cytoplasmic gain as methods for estimating calcium levels have become more sophisticated. The papers in which the voltage-gated calcium channels (VGCCs) were investigated by direct measurement of cell Ca^{2+} current are particularly interesting since such channels have been suspected to be susceptible to RF fields due to the coupling of RF to cells and the demodulation of extremely low frequency modulations from the RF carrier (Pall M., 2013; Pall M., 2014). These papers did not show significant effect due to RF exposure and thus do not support the claim that VGCCs are particularly sensitive to environmental RF exposure. Based on the overall results of these reviews, the

authors concluded that future good quality experiments are needed to support the claim that calcium levels are affected by RF exposure.

The systematic review by Bertagna *et al.* (2021) analysed the effects of EMF on neuronal ion channels. They collected papers published in the years 2005-2020 and found 33% of the total papers covered RF fields. The RF papers did not show significant effects after acute exposure while effects were reported under chronic exposure. However, the SCHEER believes that detailed description and reproducibility of the exposure parameters (dosimetry) are a basic requirement for evaluating the quality of evidence used for risk assessment. It appears that several studies on RF EMF effects included in the above systematic review did not meet this requirement.

5.2.2.4 Apoptosis

Apoptosis is an important cell death programme, highly conserved within multicellular organisms and genetically controlled, which is responsible for the removal of damaged, dysfunctional or no longer necessary cells to promote homeostasis and the survival of organisms.

A scoping review (Romeo *et al.*, 2022) has been recently published that systematically maps the research regarding the effects of RF EMF on apoptosis in mammalian cells. A systematic literature search was performed, and the review was restricted to studies that adhere to basic quality criteria defined a priori (sham control, at least three independent experiments, appropriate dosimetry analysis and temperature monitoring). The authors concluded that most retrieved papers failed in complying with the presence of sham controls and dosimetry analysis, or of appropriate methods for dosimetry analysis. Moreover, most of the included studies did not find significant alterations of the apoptotic process due to RF EMF exposure. The authors pointed out that the scoping review laid the ground for a quantitative analysis of the papers included and addressing mainly questions on the direction of the effect (induction or suppression of apoptosis), effect size, possible dose-response relationship, possible major capability of certain exposure parameters to exert an effect.

5.2.3 Conclusions on interaction mechanisms

Thermal effects of RF EMF are well established and have been extensively studied. Computational and experimental studies have shown that by limiting recently introduced dosimetric quantities, like absorbed power density (APD), it is possible to control the superficial and fast tissue heating that might result from emerging applications using millimetre waves.

Reviews dealing with the effects of RF exposure on oxidative stress, genetic and epigenetic effects, and calcium signalling have been considered here to provide evidence of a cellular mechanism operating at RF exposure levels found in the everyday environment.

There are no systematic reviews and meta-analyses available for oxidative stress, epigenetic effects and calcium signalling.

The current scientific evidence, based on the narrative reviews, suggests that the cellular oxidative balance may likely be affected, although its correlation with possible adverse effects resulting from RF exposure is not clear.

Although increased levels of ROS (reactive oxygen species) were observed in cells and tissues after RF EMF exposure, an interaction mechanism of RF EMF with biological matter that could lead to genotoxicity and epigenetic effects has not been demonstrated.

There are no consistent effects on calcium signalling or on apoptosis.

In all cases, methodological quality arises as a critical issue that needs to be taken into account both in the case of individual studies and for the inclusion of studies in review papers.

In conclusion, there is no consistent evidence of biological effects involving oxidative balance, genetic and epigenetic effects, and calcium signalling that can support and strengthen the evidence from epidemiological and *in vivo* studies on RF exposure, following the WoE assessment of health risks.

5.3 Health effects

5.3.1 Neoplastic diseases

5.3.1.1 Epidemiological studies

Results from several epidemiological studies on the association between use of mobile phones and the development of brain cancer are ambiguous. In the following paragraphs, a presentation and discussion of findings from systematic reviews and meta-analysis are presented.

In one of the first meta-analyses in the field conducted in 2016, Prasad *et al.* (2017) analysed information from 14 case control studies (that were conducted from 1996-2016); This showed no significant increase in the risk of brain tumours due to mobile phone use [OR 1.03 (95% CI 0.92–1.14)]. However, for mobile phone use of 10 years or longer (or >1640 h), the authors concluded that the overall result of the meta-analysis showed a significant 1.33-times increased risk. Meta-regression analysis indicated that the observed effect was significantly associated with methodological study quality, but no relationship between source of funding and the pooled effect was evident.

In 2016, Wang and Guo published a meta-analysis that aimed to evaluate the association between mobile phone use and glioma risk through pooling the published data from 2001 to 2008. They screened the open access published case-control or cohort studies about mobile phone use and glioma risk. After searching the relevant databases, they included 11 studies. The combined data showed that there was no association between mobile phone use and glioma odds (OR = 1.08, 95% confidence interval 0.91–1.25); but a significant association was found between mobile phone use of more than 5 years and glioma risk (OR = 1.35, 95% CI: 1.09–1.62). Thus, the authors concluded that long-term mobile phone use may increase the risk of developing glioma. Another, more recent meta-analysis (Wang *et al.*, 2018) also evaluated wireless phone use risk of glioma. Ten studies on the association of wireless phone use and risk of glioma were included. The combined odds ratio of adult gliomas associated with “ever use of wireless phones”, as reported by the participants, was 1.03 (95% confidence interval 0.92, 1.16), with high heterogeneity (I² 54.2%). In subgroup analyses, no significant association was found between tumour location in the temporal lobe and adult glioma risk. A significant association with risk of glioma was more prominent in long-term users (>10 years) with odds ratio of 1.33 (95% CI 1.05-1.67). The authors concluded that “ever use of wireless phones” was not significantly associated with risk of adult glioma, but there could be increased risk in long-term users.

In line with the aims of the previous meta-analysis, the objective of Yang *et al.*, (2017) study was to investigate the potential association between mobile phone use and subsequent glioma risk using meta-analysis. They performed a systematic search for studies reporting relevant data on mobile phone use and glioma in the period 1980 to 2016. This meta-analysis included 11 studies comprising a total of 6,028 cases and 11,488 controls. There was a significant positive association between long-term mobile phone use (> 10 years) and glioma incidence (OR = 1.44, 95% CI 1.08-1.91), and a significant positive association between long-term ipsilateral mobile phone use and the risk of glioma (OR = 1.46, 95% CI 1.12-1.92). Moreover, long-term mobile phone use was associated with 2.22 times greater odds of low-grade glioma incidence (OR = 2.22, 95% CI 1.69-2.92). It is notable that mobile phone use of any duration was not associated with the odds of high-grade glioma. Contralateral mobile phone use was not associated with glioma regardless of the duration of use. Similarly, this association was not observed when the analysis was limited to high-grade glioma. In another meta-analysis by Bortkiewicz *et al.*

(2017), which included 24 case-control studies (26,846 cases, 50,013 controls) that were published before the end of March 2014, a significantly higher risk of an intracranial tumour (all types) was noted for the period of mobile phone use over 10 years (odds ratio (OR) = 1.324, 95% CI: 1.028–1.704), and for the ipsilateral location (OR = 1.249, 95% CI: 1.022–1.526). The authors concluded that findings support the hypothesis that long-term use of mobile phone increases the risk of intracranial tumours, especially in the case of ipsilateral exposure.

In a more recent meta-analysis of 46 case-control studies, Choi *et al.* (2020) investigated whether cellular phone use was associated with increased risk of tumours. Compared with never or rarely having used a cellular phone, regular use was not associated with tumour risk in the random-effects models. However, in the subgroup meta-analysis by research group, there was a statistically significant positive association (harmful effect) in the Hardell *et al.* studies (OR, 1.15, 95% CI: 1.00-1.33, n = 10), a statistically significant negative association (beneficial effect) in the INTERPHONE-related studies (case-control studies from 13 countries coordinated by the International Agency for Research on Cancer (IARC); (OR, 0.81, 95% CI: 0.75-0.89, n = 9), and no significant association in other research groups' studies. The authors concluded that cellular phone use with cumulative call time more than 1000 h significantly increased the risk of tumours; however, the heterogeneity on the findings should be further explored. In addition, the latter meta-analysis triggered significant criticism. Brzozek *et al.* (2021) underlined important methodological issues and incorrect interpretations in their commentary. In particular, Brzozek *et al.* noted that the authors of the meta-analysis mentioned that the INTERPHONE group was unfairly and repeatedly criticised for being funded by the cellular phone industry, even whilst acknowledging agreements that guaranteed the study's complete scientific independence. Secondly, the authors of the meta-analysis argued that the Hardell subset of studies were of higher quality compared to the INTERPHONE studies. Although the Hardell studies were like the INTERPHONE studies, there were subtle methodological differences in recruitment, subject age and status, exclusion criteria, data collection, definition of regular phone use etc., which could account for the different results. According to Brzozek *et al.*, a closer look at the methodological differences does not show the Hardell studies to be of higher quality than the INTERPHONE studies. Moreover, the Hardell studies included a wider age range (20–80 years) compared to the INTERPHONE studies (generally 20–69 years); it could be hypothesised that a greater age-range although increasing the sample size of the study, it did not add to statistical power and may lead to the inclusion of tumours with recognizably different aetiology. Moreover, exposure misclassification remains a prominent issue in both groups of studies with Hardell defining "any use" as regular phone use. This is questionable because it includes casual phone users. If mobile phones truly cause cancer, but only at higher exposures, employing such a definition of regular use means that the effect might be weakened. Finally, Brzozek *et al.* noted that the meta-analysis which pooled different types of case-control studies and tumour types together was limited, as these tumours may have different aetiologies and no viable biological mechanism to how a cellular phone use exposure could cause these various tumours. Moreover, de Vocht and Rösli (2021) also made significant criticism of the meta-analysis by Choi *et al.*; they underlined that the observational epidemiological studies used were susceptible to various biases that can result in under- or over-reporting of the true effects. De Vocht and Rösli suggest that in-depth evaluation is needed to understand why the studies by the Hardell group provide different results than most other case-control studies. In the absence of direct evidence for any causes of these differences, triangulation of epidemiological studies susceptible to different types of biases, as well as with evidence from animal and laboratory studies is warranted. Although some uncertainties remain, de Vocht and Rösli concluded, most notably for highest exposed users, that we can be reasonably sure that the current evidence has converged to somewhere in the range of an absence of excess risk to a moderate excess risk for a subgroup of people with highest exposure. In the response to the above criticism, Myung *et al.* (2021) defended the decision to combine different types of tumours in the meta-analysis. However, since the mechanisms of potential tumour induction are not yet

understood, the SCHEER does not support this aggregation. On the criticism that the relative excess risks reported by the Hardell group associated with any mobile phone use are implausible, the authors responded with the hypothesis that more rural than urban users were included in those studies, which is unsubstantiated.

Intracranial tumours are rare diseases, with their incidence rates varying between 7 to 10 per 100,000. Current epidemiologic evidence suggest that the most frequently reported histology is meningioma, followed by gliomas, pituitary gland tumours, and nerve sheath tumours. In a meta-analysis published in 2019 by Rösli *et al.*, mobile phone use and risk of intracranial and salivary gland tumours was evaluated. The meta-analysis included both case-control and cohort studies published up to the end of 2017. Glioma was the most frequently studied type of tumour in relation to mobile phone use; results of the meta-analysis showed no indication for an increased risk of glioma (pooled RR 1.11, 95%CI 0.85 to 1.46, n =7), acoustic neuroma (pooled RR 1.19, 95%CI 0.80 to 1.79, n =6), meningioma (pooled RR 1.03, 95%CI 0.90 to 1.17, n =6), pituitary (pooled RR 1.07, 95%CI 0.64 to 1.77, n =4) and salivary gland tumours (pooled OR 0.74, 95%CI 0.48 to 1.15, n =6). Authors of the meta-analysis also underlined that the inconsistencies in their findings with some other meta-analyses might be due to methodological reasons, such as multiple counting of the same individual data or combined different disease entities and recall bias, particularly in case-control studies. Especially for glioma and acoustic neuroma, the pooled effect estimates of the meta-analysis were mainly driven by the pooled Orebro studies (Hardell and Carlberg, 2015; Hardell *et al.*, 2013), which produced excess pooled estimates of risk that are hardly ever observed in clinical setting.

In another meta-analysis of three case-control studies that evaluated the association between mobile phone use and parotid gland tumours, authors reported that cell phone use was associated with greater odds (OR = 1.28, 95%CI: 1.09-1.51) to develop salivary gland tumours (de Siqueira *et al.*, 2017). It is noted that an ecological study by Karipidis *et al.* (2021b) exists, in which the investigators performed analyses of incidence time trends to estimate the annual percentage change of salivary gland cancers of all available national registration data from 1982 to 2016, in Australia. Their results did not indicate that mobile phone use was correlated with the incidence of parotid or other salivary gland cancers across time. However, these findings should be interpreted in light of several methodological issues that such designs carry, like ecological bias, residual confounding, and effect modification of exposure-related factors.

Finally, in a recently published large-scale observational prospective study that was conducted during 1996-2001 with follow up in 2011, among 1.3 million women born between 1935-1950, and followed up via record linkage to National Health Services databases, no significant associations were observed of "ever mobile phone use" with incident brain tumours, meningioma, pituitary tumours, and acoustic neuroma, as compared to "never users" (Schüz *et al.*, 2022). Specifically, compared with never-users, no significant associations were found, overall or by tumour subtype, for daily cellular telephone use or for having used cellular telephones for at least 10 years. However, the authors acknowledged a number of limitations which the SCHEER also considered, namely, that the exposure to mobile phones assessment was very simple, there was a lack of detailed cellular telephone use history and lack of information on the type of cellular telephone technology used. Moreover, misclassification may have also occurred in the first years of follow-up, especially due to the rapid grow of mobile phones use observed in the later years. Although this was an observational study with known limitations, the SCHEER has presented its results here because of its methodological merits in the recruitment of participants.

It should be noted that one more review on RF EMF and brain tumours has been identified, i.e., Pareja-Peña *et al.* (2022), but this was not considered relevant for risk assessment, due to methodological inadequacies (e.g., problematic search strategy and arbitrary selection criteria, like "articles highly cited").

5.3.1.2 *In vivo* studies

Between 2015 and 2021, in total five carcinogenicity studies published in three papers (NTP, 2018a; NTP, 2018b; Falcioni *et al.*, 2018), one pilot study (de Seze *et al.*, 2020) and one co-carcinogenicity study were identified (Lerchl *et al.*, 2015).

Several aspects of the NTP and Falcioni *et al.* studies were already commented on elsewhere (e.g., Belpoggi *et al.*, 2021; BERENIS, 2018; Elwood & Wood, 2019; FDA, 2020; Garofalo *et al.*, 2020; ICNIRP, 2020b; Kuhne *et al.*, 2020; Lin, 2019; Melnick, 2020; SSM, 2019).

Results from four extensive carcinogenesis studies conducted by the National Toxicology Program (NTP), USA, were published in two reports (NTP, 2018a; NTP, 2018b). Hsd: Sprague Dawley SD rats were exposed to 900 MHz GSM- or CDMA-modulated signals at whole-body specific absorption rates (wbSAR) of 1.5, 3 or 6 W/kg (NTP, 2018a), and B6C3F1/N mice to 1900 MHz GSM- or CDMA-modulated signals at wbSARs of 2.5, 5 or 10 W/kg (NTP, 2018b). Each sham and exposure group consisted of 90 males and 90 females. The animals were exposed daily in an intermittent 10-min field on, 10 min-field off scheme. Exposures were interrupted from 7 to 11 a.m. and from 2 to 3:40 p.m. which led to a cumulative exposure of 9 h 10 min per day. Average wbSARs were kept constant during animals' entire life. Rats' exposure began in utero (on gestation day 5) and continued for 107 weeks after birth. In mice, it started at 5-6 weeks of age and continued for 106 and 108 weeks in males and females respectively.

The prominent finding was an increased incidence of malignant schwannomas in the heart of male rats. It occurred with a statistically positive trend (GSM, $p=0.041$; CDMA, $p=0.011$) with increasing wbSAR. In 1.5, 3, and 6 W/kg exposed males the malignant heart schwannomas (GSM 2/90 [$p=0.297$], 1/90 [$p=0.540$], and 5/90 [$p=0.080$], respectively; CDMA 2/90 [$p=0.273$], 3/90 [$p=0.175$], and 6/90 [$p=0.030$], respectively) were increased compared to sham exposed rats (0/90). Thus, the observation of malignant heart schwannomas in male rats was reported to be significant at the highest dose level (6 W/kg wbSAR) tested in CDMA.

Overall, NTP's summarising conclusions were: In male SD rats "for both GSM- and CDMA-modulated RFR, we conclude that exposures increased the number of animals with tumours in the heart. Tumours of the brain were also considered to be related to exposure; and increased numbers of male rats with tumours of the adrenal gland were also related to exposure. We are uncertain whether occurrences of prostate gland, pituitary gland, and pancreatic islet tumours in male rats exposed to GSM-modulated RFR and pituitary gland and liver tumours in male rats exposed to CDMA-modulated RFR were related to RFR exposures. This was also the case with female rats, where we conclude that exposure to GSM- or CDMA-modulated RFR may have been related to tumours in the heart. For females exposed to CDMA-modulated RFR, occurrences of brain and adrenal gland tumours may have been related to exposure" (NTP, 2018a).

"For GSM-modulated RFR, we conclude that exposure to RFR may have caused tumours in the skin and lungs of male B6C3F1/N mice and malignant lymphomas in female mice. For CDMA-modulated RFR, we conclude that exposure to RFR may have caused tumours in the liver of male mice and malignant lymphomas in female mice" (NTP, 2018b).

The strengths of the NTP studies are:

- study reports with all study details are publicly available (NTP, 2018a,b),
- detailed dosimetry (Capstick *et al.*, 2017; Gong *et al.*, 2017),
- testing two species as it is usual practice when interpreting cancer results for application to humans (Elwood & Wood, 2019),
- three exposure levels used in each study,
- GLP, animal facility accredited by AAALAC International,
- sentinel animal programme,
- single cage housing (one animal per cage), *i.e.*, no shielding by other animals in the cage

- complete histopathology including peer review and standardized pathology nomenclature,
- availability of published historical control data (NTP 2020),
- group size above average.

Limitations are:

- no temperature measurements during the carcinogenicity studies but strong evidence on thermoregulatory stress in the “high dose” groups (wbSAR of 6 W/kg) of male rats (Kuhne *et al.*, 2020),
- differences in body weight development and survival between sham and exposed males,
- only one concurrent sham control group per species,
- no cage control group.

The controversial discussion about the results of the rat studies is mainly based on

- the lack of tumours in the sham controls, while there were tumours in the historical controls (NTP, 2020), and
- the strong evidence on significant temperature fluctuations in exposed aged male rats, likely causing lower body weights and probably effecting survival and tumour incidences.

This results in a considerable uncertainty about how to interpret the results of the NTP rat studies (SSM, 2019) whereas the mouse studies showed equivocal results describing background fluctuations of the observed tumours “and not an increase caused by exposure to RF radiation” (FDA, 2020). Follow-up studies are planned (Ahn *et al.*, 2022).

A fifth large rat carcinogenicity study reporting heart schwannomas was conducted by Falcioni *et al.* (2018). Already in 2005 starting the experiment, they exposed 2,448 male and female of the Institute's own Sprague-Dawley rats prenatally from the 12th day of gestation until their natural death for 19 h/day to a 1800 MHz GSM far field signal which was reported to be 0.001, 0.03 or 0.1 W/kg wbSAR. After weaning, five rats per cage (1025 cm² floor area) were irradiated. Histopathology data were reported for brain and heart only.

In-life data of mean water and food consumption, body weight development or survival did not differ between sham and exposed groups, either in male or female rats. Compared to sham controls the incidence of heart schwannomas in male rats exposed at the highest wbSAR (0.1 W/kg) increased significantly (0/412 vs. 3/207). In addition, increased incidences of heart Schwann cell hyperplasia in males (3/412 vs. 5/207) and females (2/405 vs. 2/202) and malignant glial tumours in females only (2/405 vs. 3/202) were reported, but these were not statistically significant.

Strengths of the study are

- the group sizes (n >>200 per group and sex),
- three exposure levels,
- survival time of animals, and
- standardised pathology nomenclature.

Limitations are

- the lack of dosimetry,
- crowded cages resulting in rats’ shielding each other and potentially stressed animals (hierarchy conflicts and fights, particularly in males),
- missing data on potential loss of animals due to group housing,
- missing correction for multiple testing in statistical analysis,
- no sentinel programme regarding animals’ hygienic status (microbiology, parasitology) reported,
- very limited tumour data due to incomplete histopathology (two organs only were evaluated),

- no reference for historical control data given, and
- overall, a lot of study details according to OECD 451 and GLP guidelines are not publicly available.

By contrast to the authors' conclusion, the results are not consistent with those of the NTP study, where no increased tumour incidences were found with the exposure level of 1.5 W/kg (SSM, 2019). In addition, selective reporting of specific tumours is not state of the art. The authors may overcome this shortcoming with a further publication presenting all tumour data and adequate dosimetry data.

Finally, de Seze *et al.* (2020) tested in male Sprague Dawley rats the effects of nanosecond high power pulsed microwaves (ns HPM). In a complex experimental design, a pilot study addressing cancer was included. Twenty-four rats were sham-exposed, another 24 animals were exposed to 3.7 GHz ns HPM. HPM were produced by a superradiance generator in the S band at 3.7 GHz with pulses of 2.5 ns. The exposure lasted 26 min/day (2 x 8 min with 10 min interval), 5 days/week for 8 weeks. The peak E-field was 0.56 MV/m. Calculations of peak SAR revealed 3.33 MW/kg and an average SAR of 0.83 W/kg. Following the 8 weeks-exposure all 48 rats were observed up to two years of age. All (tumour) masses detected in-life and during necropsy were histopathologically examined. HPM exposure caused a 4-month decrease of lifespan compared to sham controls (median lifespan of 590 days compared to 722 days). The exposed group consisted of 17 tumour-bearing rats compared to 3 in the sham group. Most of the tumours were diagnosed as (subcutaneous) fibroma, fibroadenoma and fibrosarcoma. Unfortunately, the tumour reporting did not follow international standards, and tumour statistics were not presented. But the other study limitations were discussed by the authors:

- missing numerical and experimental dosimetry and thermometry, *i.e.* SAR values were calculated,
- 0.8 Gy residual X-rays (20 mGy/d) emitted from the exposure device.

Summarising, the obtained results need to be proven in further state-of-the-art cancer studies, using different species and both sexes, different exposure levels, and including a positive control exposed at 0.8 Gy.

Addressing co-carcinogenicity, Lerchl *et al.* (2015) performed a replication of the study by Tillmann *et al.* (2010) testing the same UMTS signal but at different exposure levels and using more animals per group. Tillmann *et al.* had found an increased incidence and multiplicity of lung carcinomas as well as more liver tumours in ENU-induced and up to 24 mo. (20 h/d) RF-exposed female mice compared with animals treated ENU alone. The effects on liver tumours were discounted due to possible confounding caused by bacterial (*Helicobacter* sp.) infection. UMTS exposure alone had no tumourigenic effect. Due to limitations in the design, Tillmann *et al.* rated their experiment as a pilot study which showed some co-carcinogenic effect of lifelong UMTS exposure (4.8 W/m²) in female B6C3F1 mice (SCENIHR, 2015).

In the study of Lerchl *et al.* (2015), ENU was administered to pregnant mice on day 16 post conception (pc), which remain, starting on day 6 pc, to be exposed to a UMTS signal for 19.5 h per day during the entire pregnancy, and the offspring continued to be exposed up to a total exposure period of 72 weeks. Nominal wbSAR were 0 (sham), 0.04, 0.4 and 2 W/kg and 96 females per group were used, added by a (non-ENU) cage control group. Increased incidences of bronchoalveolar and hepatic tumours and lymphomas were reported, but without an exposure-response pattern. Bronchoalveolar carcinomas and lymphomas were only increased with 0.4 W/kg, while bronchoalveolar adenomas were more increased with 0.04 and 0.4 W/kg than with 2 W/kg. Hepatocellular carcinomas were increased in all exposure groups about 10 -16 % compared to sham controls.

With three exposure levels, group sizes of n = 96 and an extensive statistical evaluation Lerchl's study offers some major advantages. On the other hand, there was no temperature monitoring, no RF only control, no data which was "either simulated or

measured that correlated E-field with the desired treatment levels of whole-body SAR” (FDA, 2020), and no sentinel programme, except Helicobacter testing after one year only.

Nevertheless, Lerchl’s experiment resulted in similar findings as described by Tillmann *et al.* (2010). But the results are inconsistent in that they did not demonstrate a clear dose response (SSM, 2019; FDA, 2020). Furthermore, the study was designed with very specific experimental conditions which cannot directly be extrapolated to human exposures (SSM, 2019). But such studies testing potential tumour promoters may be useful as long as humans are simultaneously exposed to several tumour promoting agents and tumour initiating carcinogens, e.g., cigarette smoke (BERENIS, 2018).

5.3.1.3 Conclusions on neoplastic diseases

There is a weak weight of evidence on the interaction mechanisms causing genotoxicity and epigenetic effects, due to the severe data gaps that do not allow these mechanisms to be fully understood.

Regarding carcinogenicity in animals, there is an overall uncertain weight of evidence due to

- the inconsistencies and partial inaccuracies in the rat studies,
- the different tumour responses in the (NTP) mouse studies compared to the rat studies (lack of species consistency in terms of observed effects), which increases uncertainty about the relevance of these effects to humans.

For the pilot study at present a weighing of evidence is not possible. But results should be confirmed or refuted, since the (pilot study) rats repeatedly exposed to extremely high intensity microwave pulses¹⁷ with an average SAR level below the thermal threshold of 4 W/kg demonstrated a tumour response.

Regarding co-carcinogenicity, the studies so far do not provide any further insight towards a carcinogenic risk, because mouse-specific tumours may have been promoted, but without an exposure-response pattern. Therefore, there is weak weight of evidence for the co-carcinogenicity of exposure to RF EMF, due to data gaps.

Meta-analyses based on epidemiological studies suggested a possible relative risk for glioma among long-term users as compared to non-users, but since this effect was very low, it is difficult to be detected at the population level, and, therefore, an attributable fraction to be calculated.

Moreover, several methodological issues of the reviewed meta-analyses of epidemiological studies could be identified, such as the number of independent studies included in the meta-analyses which varies considerably from very few, *i.e.*, 3, to several, *i.e.*, 15 studies. In addition, the heterogeneity of some of the meta-analyses was high, suggesting diversity in the design of the enrolled studies. For example, the variety in the period covered (e.g., some historical studies might introduce issues concerning varying data quality), or the recruitment criteria of the participants in the individual studies and the challenges of quantification of exposure (e.g., never used, frequent user, long term user- potentially different definitions in different studies and dependent on personal recall) could be possible sources of bias and lead to additional uncertainty.

Regarding carcinogenicity in humans, based on the available information provided in meta-analyses, and individual studies, the weight of evidence for adverse health effects from exposure to RF EMF is uncertain.

In conclusion, there is overall uncertain to weak weight of evidence that exposure to RF EMF increases the risk of neoplastic diseases.

¹⁷ Around 1 MV/m, “comparable to those that have in part been used in the Gulf War” (de Seze *et al.*, 2020)

5.3.2 Neurological and neurobehavioural effects

5.3.2.1 Epidemiological studies

There are some studies that have also focused on the impact of radio frequency EMF exposure on neurological and neurobehavioral effects.

Neurodegenerative diseases

No systematic review papers or meta-analyses could be identified regarding neurodegenerative effects of RF EMF. The Health Council of the Netherlands report (2020a, 2020b) underlines the limited number of studies. Indeed, only one epidemiological study was used for neurodegenerative diseases (13 were rejected) and 13 animal studies were considered. According to the report it is "not possible to make a statement on a relation between exposure to radiofrequency electromagnetic fields and neurodegenerative diseases" based on human studies. However, in some of the animal studies "an increased level of neurodegeneration was found, but (that) the endpoints used are widely varying. The conclusion for the frequency range of 700-2200 MHz is that effects are possible."

Neuropsychiatric conditions

No systematic review papers or meta-analyses with robust design (*i.e.*, solid research hypothesis, transparent literature search, adequate number of studies included with specific inclusion and exclusion criteria), could be identified regarding the potential effects of mobile phone use on neuropsychiatric conditions.

Neurodevelopmental disorders (e.g., autism, attention deficit, etc.)

No systematic review papers or meta-analyses with robust design could be identified regarding the potential effects of mobile phone use on neurodevelopmental disorders, either.

As a result, there are no new reviews on neuropsychiatric conditions or neurodevelopmental disorders meeting SCHEER criteria of the level of evidence, in addition to the ones included in the SCENIHR report of 2015 (SCENIHR, 2015).

5.3.2.2 Neurophysiological and neuropsychological human studies

Introduction

Effects of RF EMF exposure can be considered/analysed at various levels. Effects on the brain, which is largely disconnected from the environment and unresponsive to exogenous stimulation, can be investigated during sleep. Three approaches can be used: 1) self-assessment of sleep quality (which belongs to the section 5.3.3), 2) objective parameters of sleep initiation, sleep maintenance, and sleep structure as derived from polysomnographic measures, and 3) quantitative measures of the sleep EEG like power spectral values. As stated earlier (see sections 4.2.1.3. and 4.2.2.2) effects have been shown repeatedly for the power spectra of the sleep and the waking EEG. The resting state waking EEG, which is usually dominated by waves in the alpha frequency range, is physiologically completely different from the sleep EEG, where slower waves prevail, *i.e.* waves in the theta and delta frequencies ranges. When the brain is challenged by external stimuli it responds with specific response patterns, *i.e.* with event-related potentials (e.g. slow cortical potentials, evoked potentials). If a reaction to the stimulus is required or a cognitive task has to be processed effects on behavioural measures like reaction times, number of correct responses etc. can also be assessed. Brain physiology and function thus encompass a large number of independent outcome parameters. Despite the importance of brain function as a target parameter in studies of effects of radiofrequency exposure, the number of systematic reviews and meta-analyses, respectively, is comparatively small.

Based on the hypothesis, that RF EMF does affect the human brain, Hinrikus *et al.* (2021), reviewed literature published in the period 2007 – 2021 to identify a threshold for effects. They searched the EMF portal database using the filter settings radio frequency, mobile

communication and experimental studies. The keywords: EEG, cognition and behavior were applied. These settings led to the identification of 76 studies, which were included in the review. The studies covered the resting state EEG, sleep EEG and sleep quality, event related potentials (ERP), cognition and behavior as well as two other outcomes (cortex oxygenation and brain glucose metabolism). The authors propose several hypotheses from the discussion of the results (e.g., some individuals are sensitive to RF EMF exposure, there is a possible causal relationship between RF EMF effects and depression). However, the overall conclusion is that no principal threshold of an effect of RF exposure on the brain could be determined.

With the aim to discuss possible health effects of 5G, the same group (Hinrikus *et al.*, 2022) reviewed whether effects of RF exposure on the brain depend on the frequency and the signal structure. The search for human experimental studies investigating effects on the resting state EEG, sleep EEG and sleep quality, brain metabolism, event related potentials, as well as cognition and behavior ended up with 73 studies which were included in the review. All of them were also included in Hinrikus *et al.* (2021). There was no consistent relationship between the character of RF EMF effects and parameters of exposure by different generations (2G, 3G, and 4G) of telecommunication technology. The authors conclude that the impact of 5G in the NR FR1 frequency range (up to 10 GHz) should principally not be different from the one of previous generations. Given that the frequency used in 5G is higher and the penetration depth lower they expect that effects are even lower than for previous generations of mobile telecommunication. Since the mechanisms underlying possible RF EMF effects are not yet known, and since there is a lack of experimental in vivo studies of 5G FR2 exposure the authors underline the need for further studies.

Cognitive function

For cognitive functions there is one meta-analysis (Zubko *et al.*, 2017) that addresses the effects of EMF emitted by GSM phones on working memory, which is one of several cognitive domains that can be considered. Working memory is a domain that is of special interest in normal and pathological age-related cognitive decline. The meta-analysis included 10 studies in which working memory was assessed in one or more of three tasks; n-back (0-back – 3-back), subtraction, and digit span task. Based on three to five studies, meta-analyses were performed separately for accuracy and reaction times of the four n-back tasks as well as for accuracy of the digit span task, and the reaction time of the subtraction task. The authors concluded that there is no evidence that short-term exposure has an effect on working memory.

In a narrative review, Curcio (2018) summarised the results of 43 experimental studies in volunteers which investigated effects of mobile phone-like signals on attention. Attention is another cognitive domain and covers selective, sustained, and divided attention. The studies are quite heterogeneous with regard to methodology, dosimetry, and statistical analyses. Thirty-one studies did not report a statistically significant difference in attention between the sham and the RF exposure, nine observed a partial improvement, *i.e.* in speed of performance and/or in accuracy, while three showed inconsistent results or a worsening in performance.

The lack of evidence for exposure effects on attention and working memory are in line with the last SCENIHR Opinion (SCENIHR 2015). Based on criteria for inclusion, which are the same than those used by the WHO (2014), the Health Council of the Netherlands (2020a, 2020b) identified 48 experimental human studies investigating RF EMF effects on cognitive functions in the frequency ranges 700 – 2200 MHz (46 studies), 2.2 to 5.0 GHz (two studies), and 20-40 GHz (no study). Thirty-one of the 46 experimental studies identified for the frequency range 700-2200 MHz did not find an effect of exposure, seven studies reported an unfavourable effect of exposure on cognitive function while eight observed a favourable effect. One of the two studies for the frequency range 2.2 – 5.0 GHz showed no effect while the other observed an unfavourable effect. Without differentiation between cognitive domains, the Health Council of the Netherlands

concluded that both frequency ranges, for which data are available, favourable and unfavourable effects of RF EMF exposure are possible.

Event-related potentials

SCENIHR (2015) concluded that for event-related potentials (including slow cortical potentials) results were inconsistent. Since there is no meta-analysis and no systematic review available for ERPs, the following assessment is based on the report of The Health Council of the Netherlands (2020b). The Health Council of the Netherlands (2020b) identified 27 studies, addressing effects of RF EMF exposure on event-related potentials in the frequency range 700 – 2200 MHz: For the other frequency ranges no studies were found. All studies are listed under brain electrical activity. Nineteen investigated healthy adults, three children and five patients with different neurological diseases. Approximately 50% (14 out of 27) observed an effect (two of the studies in children, 4 of the studies in patients and eight in healthy subjects). For all studies in which effects were observed, it is not clear whether these are favourable or unfavourable.

Resting-state waking EEG

SCENIHR (2015) concluded that mobile phone RF EMF exposure might affect brain activities as reflected by EEG studies during wake and sleep. Due to various methodological issues, it was, however, not possible to derive firm conclusions. The Health Council of the Netherlands summarised 20 studies investigating the waking EEG (700 – 2200 MHz: 19; 2.2 – 5.0 GHz: 1). Overall, four studies did not observe an effect while 16 did, including the one referring to exposure at the higher frequency range. The latter observed an unfavourable effect of exposure while for all others the effect could not clearly be classified as favourable or unfavourable. Furthermore, the assessment did not take into account whether RF EMF exposure led to an increase or a decrease of the EEG spectral power.

Additionally, two narrative reviews were published that looked at the resting state waking EEG studies in more detail. Based on the following four inclusion criteria, 1) blind condition (single or double blind) with a crossover design, 2) EEG technique as experimental approach, 3) investigation of the waking spontaneous EEG, and 4) radiofrequency range related to MP technologies Wallace and Selmaoui (2019) identified 30 studies. Most of the studies (80%) observed an effect of RF EMF exposure on the EEG, 47% found an effect exclusively in the alpha frequency band while 30% found an effect in the alpha frequency band and other frequency bands (delta, theta, beta and gamma) as well. However, not all studies considered all frequency ranges. Studies on adolescents did not indicate that this age group had any higher degree of sensitivity than adults. On the other hand, four studies in epileptic patients showed an effect of RF EMF exposure from 2G on the EEG. The authors conclude that a direct and clear comparison of the main findings obtained so far is not easy due to the considerable differences in the experimental protocols and methods, like the nature of the RF EMF signal, its modulation, exposure duration, position of the exposure device and characteristics of the participants. The authors emphasise that future studies should use a randomised and counterbalanced double-blind cross-over design. Furthermore, studies should be carried out with a detailed dosimetry and standardised protocol criteria controlling the variability of the physiological state of the brain between participants, e.g., by performing test sessions at the same time of the day.

Almost at the same time, Danker-Hopfe *et al.* (2019) published a paper deriving at very similar results and recommendations. Based on a continuous monitoring of the literature published between 1997 and 2016, 39 studies investigating RF EMF effects on the resting state waking EEG were identified. Excluded were studies that were not published in English language, not published in peer-reviewed journals, where EEG was recorded for an interval of milliseconds prior to event-related potentials that did not provide sufficient description of the sample and results, or that did not explicitly investigate EEG power. Applying these criteria, 22 studies remained in the analysis. All investigated the alpha frequency band, the number of studies considering other frequency bands was lower (theta and beta: 19, delta: 17 and gamma: 7). In 64% of these studies, variation of EEG power in the alpha frequency band was observed, while in 36% no effect was observed. However, of the 14

studies that showed an effect, 10 observed an increase in alpha power while four observed a decrease. All other frequency bands were also affected in at least in one (theta) up to seven (beta band) studies. As for the alpha frequency band, increases and decreases in the band specific power were observed (delta and beta). Danker-Hopfe *et al.* (2019) described in detail how various factors (e.g., age, sex, individual basic EEG rhythm, recording of the EEG in an eyes-open or an eyes-closed condition, topographic aspects, control of vigilance, control of consumption of stimulating substances) affect the EEG. Furthermore, technical aspects of EEG recording (e.g., control of EMF interferences between the recording device and the electromagnetic field, when EEG is measured during exposure) and evaluation might affect EEG parameters. Finally, Danker-Hopfe *et al.* (2019) described how these factors as well as methods of statistical evaluation differ between studies.

Similarly to Wallace and Selmaoui (2019), Danker-Hopfe *et al.* (2019) emphasised that heterogeneous study protocols and different methodologies prevent a scientifically sound statement on the impact of RF EMF on human brain activity in the resting-state EEG. As in SCENIHR (2015), both studies strongly recommended more standardised study protocols that follow basic quality criteria in further research.

Sleep

With regard to RF EMF exposure effects on sleep, SCENIHR (2015) concluded that half of the studies looking at the macrostructure of sleep (especially those with a longer duration of exposure) observed effects. However, the results were not consistent with regard to the affected sleep parameters. Studies investigating effects of RF EMF exposure on the power spectra of the sleep EEG are quite heterogeneous with regard to several factors, e.g. the applied field, the duration of exposure, the timing of exposure (prior to or during sleep), the number of considered EEG leads, control of electromagnetic interference, the affected frequency band, the affected sleep stage, and time frames of investigation (e.g. whole night, first 20 or 30 min of NREM sleep or NREM stage 2 sleep, first or later sleep cycles, 4th NREM episode). Furthermore, studies vary with regard to statistical analysis. Effect sizes and/or a priori sample size calculations are usually not reported. Given all these heterogeneities, SCENIHR (2015) concluded that it was not possible to derive firm conclusions on RF EMF effects on sleep.

No meta-analysis or systematic literature review were published. The Health Council of the Netherlands (2020b) identified 18 human sleep studies (all refer to the 700 – 2200 MHz frequency range). Three investigated effects of a mobile phone base station signal, two of them observed an effect. Of 15 studies, that investigated effects of mobile phone exposure (healthy adults: 13, patients: two), nine found an effect, including one study in patients. This review does not differentiate between effects on the macro- and the microstructure of sleep. It was not possible to clearly classify any of the studies that observed a RF EMF exposure effect on sleep as either favourable or unfavourable.

5.3.2.3 Animal studies

Similar to human studies, systematic reviews are very rare.

Sienkiewicz and van Rongen (2019) published a systematic review of 62 animal (rodent) studies related to spatial learning and place memory. A total of 17 papers were excluded, primarily due to improper description of exposure or missing dosimetry. Overall, the remaining 45 reviewed studies between 1993 and 2017 are highly heterogeneous. Morris water maze test was mostly used (66 %), followed by radial arm maze (27%) and others. No consistent outcome was seen. Both impairments (21) and no effects (20) were demonstrated, and four studies reported behavioural improvements. The range of frequencies included 900, 1800 and 2450 MHz, continuous and pulsed fields, and the wbSARs were in the range of 0.1 mW/g up to >10W/kg.

The Health Council of the Netherlands (2020b) classified the outcome of experimental animal studies as those with *no effect*, *unfavourable effect*, and *favourable effect*. In

addition, excluded studies were listed and the reason for exclusion given. The three frequency ranges 700-2200 MHz, 2.2-5.0 GHz, and 20-40 GHz were discriminated but papers for the 20-40 GHz were not found. Neurological and neurobehavioural effects were divided in six subcategories.

- 1) Behavioural studies tested explorative behaviour, recognition of objects, anxiety and effects on learned behaviour. The Health Council concluded that an effect is possible for both frequency ranges of 700-2200 MHz, 2.2-5.0 GHz.
- 2) Cognitive studies looked at effects on memory, reaction speed and responsiveness. It was concluded that both favourable or unfavourable effects are possible for 700-2200 MHz, 2.2-5.0 GHz.
- 3) Brain neurotransmission. An effect is possible for both frequency ranges.
- 4) Brain electrical activity. The Health Council concluded that for 700-2200 MHz a (favourable or unfavourable) effect is likely, and is possible for 2.2-5.0 GHz.
- 5) Blood brain barrier (BBB) is protecting the brain against harmful substances in the blood. For both frequency ranges an effect is possible.
- 6) Neurodegeneration. It was concluded that effects are possible for 700-2200 MHz.

Summarising, the Opinion of SCENIHR (2015) still holds true that the weight of evidence for neurobehavioural findings in animal studies is uncertain and replication studies should be performed under much more stringent conditions (exposure and dosimetry, blinding, controls).

5.3.2.4 Conclusions on neurological and neurobehavioural effects

There is only limited evidence from meta-analyses on human studies concerning cognitive function.

Electrophysiological effects on the EEG spectra repeatedly appear in studies but they show contradictory results (either increasing or reducing the EEG power). However, there are methodological issues that need to be taken into consideration before reaching a conclusion about potential health effects. Such issues include (a) the effect of multiple testing, which is or can be particularly high in EEG studies depending on the number of electrodes considered and whether the analysis is based on EEG frequency bands or bins; (b) the high physiological variability of EEG power spectra, e.g., within a day or with intake of activating substance like caffeinated beverages; and (c) the lack of strictly standardised protocols. Therefore, it is suggested to include a negative control, e.g., analysis of differences between two sham conditions. So far, the physiological variations observed under RF EMF exposure for some of the outcome parameters (which may constitute a potential biological effect) do not indicate any adverse health effect.

Recent studies emphasise that heterogeneous study protocols and different methodologies prevent a scientifically sound statement on the impact of RF-EMF on human brain activity, in the resting-state EEG as one example. SCHEER conclusions are based on a small number of reviews, one of which is the review by the Health Council of the Netherlands (2020a, 2020b). As in SCENIHR (2015), recommendations of more standardised study protocols that follow basic quality criteria are needed in further research.

Across the various studies (and meta reviews considered), it is clear that there is a wide heterogeneity in findings both within and across studies, including differences in the protocols, sample size, etc. A systematic review on effects of exposure to radiofrequency electromagnetic fields on cognitive performance in human experimental studies was one of the systematic reviews commissioned recently by WHO (see section 4.2.3).

For animal studies the Opinion of SCENIHR (2015) still holds true that the weight of evidence for neurobehavioural findings is uncertain and replication studies should be performed under much more stringent conditions (exposure and dosimetry, blinding, controls).

Thus, in the interim, the SCHEER cannot update the original SCENIHR (2015) conclusions but looks forward to the new systematic WHO review.

5.3.3 Symptoms

One of the most common non-specific symptoms attributed to mobile phone use are headaches. Wang *et al.* (2017) performed a meta-analysis, following the PRISMA guidelines, of seven cross-sectional studies retrieved from the published literature. Among the seven included studies, five assessed the association between mobile phone use or not and headache. The combined result of pooled data revealed higher risk of headache for a mobile phone user compared with a non-user [OR 1.38 (95% CI 1.18–1.61)]. In their assessment of an effect between mobile phone call duration or frequency and headache the authors analysed pooled data that were retrieved from studies of both analogue (NMT) and digital (GSM) technologies, which, however, are very different in terms of exposure.

Farashi *et al.* (2022) performed a systematic review and meta-analysis on “mobile phone electromagnetic radiation and the risk of headache”. However, it pooled data from studies that investigated mobile phones and base station antennas, alike, although the exposure is different in these situations, both in terms of duration and intensity. Moreover, the authors’ claim of analysing “electromagnetic radiation” is not substantiated by any correlation of effects or effect sizes to a measure of RF radiation: For example, Auvinen *et al.* (2019), in their reporting of the international Cohort Study of Mobile Phone Use and Health (COSMOS) in Sweden and Finland have shown that the association of headache with call-time was stronger for the UMTS network than the older GSM technology, despite the latter involving higher exposure to RF EMF. The COSMOS results were based on operator data for the use of mobile phone collected for 24,259 respondents after a 4-year follow-up period. Another concern rises from the way the authors treated the studies, which had estimated headache for several independent variables: They extracted several estimates for one study and included all of them in the main meta-analysis. This artificially increased the study size, eventually producing pooled estimates with high precision, not reflecting true uncertainty. In any meta-analysis, a priori which type of effect size has been extracted and how different types of effect sizes have been converted to a unique effect size for the final pooling need to be defined (Jalilian *et al.*, 2022).

Schmiedchen *et al.* (2019) published a systematic review to evaluate methodological limitations in experimental studies on symptom development in IEI-EMF individuals. They included blinded experimental studies that exposed individuals with IEI-EMF to different EMF exposure levels and queried the development of symptoms during or after each exposure trial. The exposure in the studies surveyed was not limited to RF EMF but included ELF electric and/or magnetic fields. The most common limitations were related to the selection of study participants, the counterbalancing of the exposure sequence and the effectiveness of blinding. Many studies further lacked statistical power estimates. The authors noted that methodically sound studies indicated that an effect of exposure was unlikely, and that, overall, the evidence pointed towards no effect of exposure.

A study in Taiwan performed by Huang *et al.* (2018), which also includes a survey of the international literature, has reported that on the basis of a sample of 3303 participants, the prevalence rate of IEI-EMF in Taiwan declined from 13.3% to 4.6% over a period of 5 years. The literature review also found the prevalence rates in other countries to be decreasing instead of increasing as had been predicted previously. The meta-analysis of the data from the literature showed that women were more likely to have IEI-EMF than men, with an odds ratio of 1.19 (95% CI: 1.01-1.40).

Leszczynski (2021) published a review of the scientific evidence on the individual sensitivity to EMF, in which he included both provocation and observational (survey) studies, although cross-sectional observational studies cannot provide evidence for causality between subjective or objective symptoms and exposure to EMF. Moreover, the review does not provide the criteria use for literature selection or a description of the methodological approach for reviewing the studies that were eventually selected. Leszczynski (2021) concludes that most of the studies did not find any causal link between EMF and electromagnetic hypersensitivity (EHS), at least as far as acute effects were concerned, since the studies “did not have capability to examine delayed EMF responses”.

The author identifies several methodological shortcomings of the hitherto studies and proposes the use of both subjective symptoms and objective biomarkers to research for causality “because the scientific research data is of insufficient quality to be used as a proof of the lack of causality” (between EMF exposure and EHS).

5.3.3.1 Conclusions on symptoms

The systematic reviews and meta-analyses that have been published since the SCENIHR Opinion (2015) do not change the conclusions included therein concerning RF EMF exposure and headaches. As also mentioned in SCENIHR (2015), although significant associations have been found in meta-analyses of observational studies relying on self-reported exposure, caution is required in interpreting the associations suggested by these studies, mainly because self-reports of mobile phone use or of the distance to the nearest base station are known to be inaccurate and have a poor association with actual levels of RF exposure. Moreover, the cross-sectional approach often used in observational studies is a limitation and longitudinal analyses are required to exclude reverse causality.

SCENIHR (2015) concluded that the results from multiple double-blind provocation studies gave a strong overall weight of evidence that such effects are not caused by RF exposure, and that the evidence from observational studies weighed against a causal effect between EMF exposure and non-specific symptoms (IEI-EMF). The SCHEER finds that this conclusion is still valid. Given the methodological limitations of the research in this area so far, the SCHEER is of the opinion that future research should always include objective measures (physical/biochemical/biological markers) of the response to EMF exposure together with other types of psychological measures or subjective reports.

5.3.4 Other health effects

5.3.4.1 Cardiovascular diseases

A meta-analysis that investigated the effects of using a GSM900 mobile phone on heart rate variability (HRV) has concluded that the minutes of exposure (minutes of speaking on the mobile phone) do not affect the autonomic nervous system of the heart or its sympathovagal balance (Geronikolou *et al.*, 2018). This result is in agreement with the conclusion of the review conducted by the Health Council of the Netherlands (2020a, 2020b) that no effects of exposure to radiofrequency electromagnetic fields on the cardiovascular system and the autonomic nervous system have been found in the frequency range of 700-2200 MHz.

SCHEER concludes that the weight of evidence is weak for adverse effects on the cardiovascular system in humans after short-term exposure with RF EMF in the above frequency range (700-2200 MHz) but weighing of evidence is not possible for other frequencies of RF EMF.

5.3.4.2 Immune System

The immune system is a complex network of special cells, tissues, organs, and the substances they produce that, through a series of steps called the immune response, work together in fighting infections and other diseases. This network allows the immune system to keep its dynamic equilibrium through activating and inhibitory signals and, at the same time, to adapt the response to environmental hints. A healthy immune system permits the organism to interact with the environment in a safe way, keeping invading agents under control.

There are no systematic reviews or meta-analysis available in the literature to determine whether RF EMF exposure may affect immune system. Narrative reviews with robust methodological design are also lacking.

In 2013, a review paper was published by Szmigielski in which the effects of *in vitro* and *in vivo* exposure to RF fields on several immune functions such as phagocytosis, lymphocyte proliferation and antibodies production were discussed. The general conclusion

of the author was that in both *in vitro* and *in vivo* studies RF exposure may induce measurable weak effects in the number and/or activity of immune-competent cells. However, the results were incoherent (for instance, a number of lymphocyte functions resulted in being both enhanced and weakened under similar RF exposure conditions within single studies) and difficult to replicate. The author also pointed out the existence of certain indications of a temporary immunological stimulation after short term RF exposure, while prolonged exposure inhibited the same functions, although not substantiated by threshold effects (Szmigielski, 2013).

A review paper (Piszczyk *et al.*, 2021) was recently published which reports on immunity and electromagnetic fields including RF. The authors focused on both *in vivo* and *in vitro* studies reporting on the effects on immune cell types involved in the innate and adaptive immunity. The general conclusion of the authors was that RF seems to be a promising tool for modulation of immune cell signaling pathways, although it is not possible to identify an intracellular mechanism.

Both of the above review papers, however, lack the criteria for literature selection and characterisation of methodological quality of the individual included studies.

There are also several papers in the literature reporting the enhancement of immune system after millimetre-wave exposure. These papers are included in a couple of review articles in which the advantages of millimetre-waves therapy, which is widely used for the treatment of several diseases in many Eastern European countries, are highlighted. In these papers, the modulation of the immune system is mentioned as a plausible mechanism by which millimetre-waves can produce systemic whole-body effects after localized application. As a matter of fact, components of the immune system are present in the dermis portion of the skin and are, thus, accessible to millimetre-waves, at least at locations where the epidermis is thin and subcutaneous fat is sparse. Furthermore, millimetre-waves therapy, when used in combination with chemotherapy, is capable of protecting the immune system from the toxicity of chemotherapy without exerting toxicity of its own. Moreover, it has also been shown that the combination of millimetre-waves and chemotherapy is capable of reducing the tumour metastasis and tumour resistance to chemotherapeutic drugs (Logani *et al.*, 2011; Mattsson *et al.*, 2018).

Therefore, the SCHEER finds that the weight of evidence for any (beneficial and detrimental) effects of RF EMF on the immune system is uncertain due to the conflicting information from various studies.

5.3.4.3 Reproductive and developmental effects

In accordance with the PRISMA guidelines, Kim *et al.* (2021) conducted a systematic review and a meta-analysis to determine whether the exposure to RF EMF affects human sperm quality. The outcome considered were motility, viability, and concentration, which are the most frequently used parameters in clinical settings to assess fertility. The authors evaluated 18 studies that included 4280 samples. They found that exposure to mobile phones was associated with reduced sperm motility, viability, and concentration, but the decrease in sperm quality after RF EMF exposure was not significant, even when the mobile phone usage increased. However, the SCHEER notes that many of the studies included in the meta-analysis did not provide adequate information on dosimetry. Moreover, at least one study was included in the meta-analysis that had been excluded from risk assessment in the SCENIHR (2015) Opinion due to methodological/quality issues. The same problem, of including in the analysis studies with insufficient dosimetry, uncontrolled exposure, and other methodological problems (some of these studies had been excluded from or criticised in the SCENIHR (2015) Opinion), exists for the other reviews scoping the impact of RF EMF exposure on the male reproductive system (Jaffar *et al.*, 2019; Maluin *et al.*, 2021; Sciorio *et al.*, 2022). Nevertheless, it should be noted that Sciorio *et al.* (2022) comprehensively present the limitations of the studies on RF EMF exposure and the reproductive system, like controlling confounders, assessing exposure, and using standardised methods for sperm analysis.

On the issue of male reproductive hormones, Maluin *et al.* (2021) concluded that existing animal and human data on the effect of RF EMF emitted from wireless devices on male reproductive hormones were inconsistent and difficult to evaluate due to the heterogeneity of study design. However, according to the authors, most studies were consistent with the assertion that long-term exposure to RF EMR from mobile phones and Wi-Fi devices could disrupt male reproductive hormones, particularly testosterone.

In these reviews (Jaffar *et al.*, 2019; Kim *et al.*, 2021) two potential mechanisms are mentioned for the effect of RF EMF on the reproductive system: tissue heating and oxidative stress. However, Santini *et al.* (2018), in their scoping review about oxidative stress caused by EMF on both the female and the male reproductive systems, conclude that based on the current literature, the analysis of ELF-EMF and RF impact on the maintenance of male and female fertility potential reports contradictory results. The authors suggest that the main reason for these discrepancies may be the lack of uniformity in the experimental design, including the use of different models and the extremely variable exposure sources and protocols. Moreover, since ROS levels can be influenced by temperature, a possible criticism to many of these works is the lack of control of this parameter during EMF exposure. A further criticism emerging from the literature is the difficulty to understand whether EMF-induced fertility abnormalities are caused by direct gonadal damage or by disruption of the hypothalamic-pituitary-gonadal axis. On the other hand, the authors see growing evidence that damage induced by EMF to reproductive cells and organs is caused by deregulation of redox homeostasis due to mitochondrial dysfunctions and ROS overproduction.

Mahaldashtian *et al.* (2021) reviewed the literature on the effect of cell phone radiation on mammalian embryos and fetuses and concluded that it is difficult from the available animal studies to confidently document the role of RF EMF exposure on human embryo development, both *in vivo* and *in vitro*. The SCHEER agrees with general methodological limitations of studies about developmental effects of RF EMF identified by the authors, but notes that they had included in their review studies with insufficient dosimetry, uncontrolled exposure, and other methodological problems.

Tsarna *et al.* (2019) conducted a meta-analysis of four birth cohorts to study the associations of maternal cell phone use during pregnancy with pregnancy duration and foetal growth. They used data on 55,507 pregnant women and their children from Denmark (1996–2002), the Netherlands (2003–2004), Spain (2003–2008), and South Korea (2006–2011). In the three former cohorts, no exposure corresponded to no cell phone use, low exposure to ≤ 1 calls/day, intermediate exposure to 2–3 calls/day, and high exposure to ≥ 4 calls/day. In the latter (Korean) cohort, no exposure corresponded to no cell phone use, low exposure to ≤ 2 calls/day, intermediate exposure to 3–5 calls/day, and high exposure to ≥ 6 calls/day. The authors observed no association with foetal growth or birth weight. With respect to pregnancy duration, the intermediate-exposure group had a higher risk of giving birth at a lower gestational age compared with the low-exposure group (hazard ratio, HR = 1.04, 95% CI: 1.01, 1.07). The hazard ratios for the other exposure groups were closer to unity (unexposed: HR = 0.99, 95% CI: 0.97, 1.01; highly exposed: HR = 1.02, 95% CI: 0.98, 1.06), but a linear trend was observed ($P < 0.001$). In the analysis of preterm birth, a linear trend was observed ($P = 0.003$), though none of the odds ratios reached statistical significance (unexposed: OR = 0.96, 95% CI: 0.86, 1.07; intermediate exposure: OR = 1.12, 95% CI: 0.97, 1.28; highly exposed: OR = 1.28, 95% CI: 0.87, 1.88). The authors concluded that “maternal cell phone use during pregnancy may be associated with shorter pregnancy duration and increased risk of preterm birth, but these results should be interpreted with caution, since they may reflect stress during pregnancy or other residual confounding rather than a direct effect of cell-phone exposure”.

El Jarrah and Rababa (2022) performed a systematic review of the impacts of smartphone radiation on pregnancy. They included 18 studies in their “integrative review” and concluded that EMF radiation exposure was linked to hormonal, thermal, and cardiovascular changes in adults, as well as with miscarriages and alternations in foetal

temperature, HRV, and infant anthropometric measurements. The authors used *in vitro*, *in vivo*, epidemiological, and human experimental studies in their analysis, in order to assess several health endpoints (some not related to pregnancy). Due to methodological inadequacies (e.g., exclusion criteria) the SCHEER did not consider this review relevant for risk assessment.

The meta-analyses and reviews available since the SCENIHR (2015) Opinion show that the weight of evidence for reproduction and developmental effects is uncertain, due to conflicting information.

5.3.4.4 Endocrine system

Asl *et al.* (2019) conducted a systematic review on the effects of cell phone radiation on thyroid cells and hormones. They identified 22 studies for their “quantitative synthesis”, including *in vitro*, animal, epidemiological and human provocation studies. The authors did not attempt to combine conclusions from the different lines of evidence, which gave conflicting information that cannot be explained in scientific terms (uncertain weight of evidence).

5.3.4.5 Auditory and thermoelastic effects

Electromagnetic waves can be seen in the frequency range of visible light, but they can also be heard, if they are pulsed. Initially, the auditory perception of microwave pulses was thought to be an interaction of pulsed radiation directly with the auditory nerves or neurons along the auditory neurophysiological pathways of the central nervous system. However, experimental and theoretical studies have shown that ‘microwave hearing’ (aka ‘microwave auditory effect’ or ‘Frey effect’) arises from the thermoelastic theory: Microwave pulses, upon absorption by soft tissues in the head, launch a thermoelastic wave of acoustic pressure that travels by bone conduction to the inner ear, where it activates the cochlear receptors via the same process involved in normal hearing (Chou *et al.*, 1982; Lin and Wang, 2007; Lin, 2022).

Microwave hearing is an acute effect and occurs for as long as the head of a subject is exposed to pulsed RF EMF of specific frequency and pulse width. To generate perceptible acoustical stimuli a very high energy per single pulse is necessary. If the energy per pulse is limited such effects cannot occur. In the previous ICNIRP guidelines (ICNIRP, 1998) constraints had been imposed to the specific absorption from pulses to avoid microwave auditory effects, since “repeated or prolonged exposure to microwave auditory effects may be stressful and potentially harmful”. In the latest ICNIRP guidelines (ICNIRP, 2020), a specific restriction to account for microwave hearing is not considered because “there is no evidence that microwave hearing in any realistic exposure scenarios can affect health”. However, in a study about rigger safety in the telecommunications industry (Boulais, 2016), about 75% of the riggers who had experienced the microwave effect reported it as a distraction: as explained in the study, such a distraction poses an occupational risk that may result in indirect health damage.

Moreover, recently, there has been a discussion whether pulsed RF EMF can be weaponised (Lin, 2021; Dagro *et al.*, 2021; Foster *et al.*, 2021; Lin, 2022) to create a health syndrome with clinical symptoms resembling those of concussion. According to Foster *et al.* (2021), existing microwave systems can produce pulses with sufficient fluence to induce unexpected and perhaps frightening auditory sensations, but the equipment is large, e.g., the obsolete AN/FPS-67B radar system at 1.3 GHz. On the other hand, millimetre waves equipment is smaller and can be located close to a subject, allowing higher exposure levels than those considered by Dagro *et al.* (2021), if the problem of shallower penetration can be overcome. Dagro *et al.* (2021) conclude that the required power densities to induce neuropathological effects to the brain are orders of magnitude larger than most real-world exposure conditions, but can be achieved with devices meant to emit high-power electromagnetic pulses in military and research applications.

The SCHEER is of the opinion that, although the power densities necessary to induce brain damage with pulsed RF EMF are feasible with current technology, they are unlikely to occur in a real-life exposure situation. However, pulsed RF EMF can induce microwave hearing, causing distraction in occupational settings that may jeopardize occupational safety. Therefore, occupational training of RF workers should include awareness about the microwave hearing effect and its management.

Kacprzyk *et al.* (2021) performed a systematic review and meta-analysis on the impact of mobile phone use on tinnitus. Eight studies reporting the risk of tinnitus in relation to mobile phone use were identified, and six studies (two cohort studies, one case-control study, and three cross-sectional ones) of high quality were included in the meta-analysis. The authors concluded that current scientific knowledge does not support the hypothesis of an association between mobile phone use and tinnitus.

Taziki Balajelini *et al.* (2021) conducted a systematic review and meta-analysis of studies on mobile phone use and hearing impairment. The authors identified five relevant studies (two cross-sectional and three cohort studies). They concluded that likely no association between mobile phone use and hearing impairment exists.

5.3.5 Health effects from exposure to realistic WiFi signals

While exposure to WiFi-like signals might be covered in some of the review papers considered in the previous sections, Dongus *et al.* (2022) performed a systematic literature search and quality evaluation of studies investigating the potential health effects of realistic/actual WiFi signals. They eventually included two *in vitro*, five *in vivo* (nine publications), five human experimental (six publications) and four epidemiological (six papers) studies in their evaluation. The outcomes covering a broad range of biological parameters were mostly found to not be related to realistic WiFi exposure. They noticed that although in *in vivo* and *in vitro* studies exposure levels in most cases were up to the guideline levels (ICNIRP, 2020) or even higher (4 W/kg), human studies dealt with levels several orders of magnitude below the ICNIRP guidelines (of 10 W/m² for whole body exposure or 40 W/m² for local exposure or SAR 2-4 W/kg), which are typical for WiFi exposure situations in the everyday environment. For hazard identification, epidemiological studies are most appropriate to study exposure situations occurring in our environment including long-term exposure. However, it is a challenge to differentiate between physical WiFi exposure and other factors related to the use of wireless communications. Exposure to WiFi radiation is likely to be correlated with several lifestyle and behavioural factors such as socioeconomic status, stressful lifestyle, internet use including problematic use and sleep displacement or blue-light exposure from screens. Thus, epidemiological studies assessing exposure by the presence of WiFi at home or in school remain of a high ecological validity, as they represent the situation of people who complain about WiFi effects, but may suffer from considerable exposure misclassification, since the contribution of WiFi exposure to total RF EMF exposure is relatively low. The authors concluded in their systematic review that there was little evidence that WiFi exposure is a health risk in the everyday environment, where exposure levels are typically considerably lower than ICNIRP guideline values.

5.3.6 Health effects in children and adolescents from wireless devices

Bodewein *et al.* (2022) performed a systematic literature review on physiological and health-related effects of electromagnetic field exposure from wireless communication devices on children and adolescents aged between 6 months and 18 years. Their review is based on 42 epidemiological and 11 human experimental studies. While the epidemiological studies addressed the outcomes subjective symptoms (n = 14), cognitive functions (n = 12), behaviour (n = 9), infant development (n = 4), and others (n = 4) the experimental studies focused on EEG-based brain activity and cognitive functions (n = 9) and physiological parameters (n = 2). The authors state that "most of the studies displayed several methodological weaknesses". The evidence for RF EMF effects on subjective symptoms, cognition and behaviour were judged to be low to inadequate. Evidence from

the few studies investigating early childhood development, brain activity, cancer, and physiological parameters was considered inadequate for drawing conclusions. Since the overall body of evidence did not allow a final conclusion, the authors emphasize the need for high quality systematic research on children and adolescents, which are considered to be sensitive age groups.

6 RECOMMENDATIONS FOR FUTURE WORK

The SCHEER welcomes the development of a number of WHO protocols for systematic reviews that will strengthen the level of evidence about health effects from RF EMF exposure. The SCHEER suggests that any future policy changes on the matter of EMF health effects should consider the conclusions of the systematic reviews that will result from these protocols.

There is a need for more research in the higher frequency bands of the RF spectrum (*i.e.*, millimetre waves) and their adverse, favourable or lack of health effects.

Additional hypothesis-driven experiments on the interaction mechanisms of RF EMF (other than tissue heating) are necessary, but under strict methodological quality criteria about experimental design, exposure control and assessment, statistics and results analysis. The SCHEER notes that several experimental studies have been considered in meta-analyses and reviews, although they had not fulfilled these criteria.

The methodological limitations of the research performed in the area of symptoms call for the inclusion of objective measures (physical/biochemical/biological markers) of the response to EMF exposure, together with other types of psychological measures or subjective reports.

Moreover, the SCHEER notes that it is likely that the future research agenda will be largely determined by the results of the WHO commissioned reviews.

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8 GLOSSARY OF TERMS, UNITS

APD	Absorbed Power Density (W/m ²)
SAR	Specific Absorption Rate (W/kg)
wbSAR	whole body SAR (W/kg)
psSAR	peak spatial SAR (W/kg)

9 LIST OF ABBREVIATIONS AND ACRONYMS

BS	Base Station
CDMA	Code-Division Multiple Access
CI	Confidence Interval
EEG	Electroencephalogram
EHS	Electromagnetic Hypersensitivity (IEI-EMF)
EI	Exposure Index
ELF	Extremely Low Frequency
EMF	Electromagnetic Field(s)
GRADE	Grading of Recommendations, Assessment, Development and Evaluations

GSM	Global System for Mobile communications
HR	Hazard Ratio
ICNIRP	International Commission on Non-Ionizing radiation Protection
IEI-EMF	Idiopathic Environmental Intolerance attributed to EMF
IoT	Internet of Things
IQR	Interquartile Range
MIMO	Multiple-input multiple-output
NMT	Nordic Mobile Telephony
OR	Odds Ratio
PRISMA	Preferred Reporting Items for Systematic Reviews and Meta-Analyses
RAT	Radio Access Technology
RF	Radiofrequency
RFR	Radiofrequency radiation
ROS	Reactive Oxygen Species
RR	Relative Risk
SCENIHR	Scientific Committee on Emerging and Newly Identified Health Risks
SD	Standard Deviation
UMTS	Universal Mobile Telecommunications System
WHO	World Health Organization