



**Karolinska Institutet**  
Department of Neuroscience  
Experimental Dermatology Unit

Stockholm, June 1, 2011

To:  
Dr Pakishe Aaron Motsoaledi  
Minister of Health  
South Africa  
([masukm@health.gov.za](mailto:masukm@health.gov.za))  
([sethom@health.gov.za](mailto:sethom@health.gov.za))

cc :  
Mrs Bomo Edna Edith Molewa  
Minister of Environmental Affairs  
([magagak@dwa.gov.za](mailto:magagak@dwa.gov.za))  
([NNkotsoe@environment.gov.za](mailto:NNkotsoe@environment.gov.za))

Dr Bonginkosi Emmanuel Nzimande  
Minister of Education – Higher Education and Training  
([makwetu.n@dhe.gov.za](mailto:makwetu.n@dhe.gov.za))

Ms Matsie Angelina Motshekga  
The Minister of Education – Basic Education  
([mabua.s@dbe.gov.za](mailto:mabua.s@dbe.gov.za))  
([janine.buitendag@gauteng.gov.za](mailto:janine.buitendag@gauteng.gov.za))

Mrs Mohlala Mamodupi  
National Consumer Commission  
([MSMedupe@thedti.gov.za](mailto:MSMedupe@thedti.gov.za))

Advocate Thulisile Madonsela  
Public Protectors Office  
([stewartb@pprotect.org](mailto:stewartb@pprotect.org))

Dear Dr Motsoaledi,

Please, find below some comments regarding wireless communication, public health, and a Call for Inquiry:

Wireless communication is now being implemented in our daily life in a very fast way. At the same time, it is becoming more and more obvious that the exposure to electromagnetic fields not only may induce acute thermal effects to living organisms, but also non-thermal effects, the latter often after longer exposures. This has been demonstrated in a very large number of

---

Mailing address  
Experimental Dermatology Unit  
Department of Neuroscience  
Karolinska Institutet  
171 77 Stockholm  
Sweden

Visiting address  
Retziuslaboratoriet  
Retzius väg 8  
Solna

Telephone  
Direct 468-52 48 70 58  
Switchboard 468-52 48 64 00  
Fax 468-30 39 04  
Fax (KI) 468-31 11 01



## Karolinska Institutet

Department of Neuroscience  
Experimental Dermatology Unit

studies and includes cellular DNA-damage, disruptions and alterations of cellular functions like increases in intracellular stimulatory pathways and calcium handling, disruption of tissue structures like the blood-brain barrier, impact on vessel and immune functions, and loss of fertility. Whereas scientists can observe and reproduce these effects in controlled laboratory experiments, epidemiological and ecological data derived from long-term exposures reflect in well-designed case-control studies the link all the way from molecular and cellular effects to the living organism up to the induction and proliferation of diseases observed in humans. It should be noted that we are not the only species at jeopardy, practically all animals and plants may be at stake. Although epidemiological and ecological investigations as such never demonstrate causative effects, due to the vast number of confounders, they confirm the relevance of the controlled observations in the laboratories.

Because the effects are reproducibly observed and links to pathology cannot be excluded, the precautionary principle should be in force in the implementation of this new technology within the society, especially when it comes to exposure of children. This will be the only method to support the sustainability of these innovative wireless communication technologies. The February 2, 2000 European Commission Communication on the Precautionary Principle notes: "The precautionary principle applies where scientific evidence is insufficient, inconclusive or uncertain and preliminary scientific evaluation indicates that there are reasonable grounds for concern that the potentially dangerous effects on the environment, human, animal or plant health may be inconsistent with the high level of protection chosen by the EU". Therefore, policy makers immediately should strictly control exposure by defining biologically-based maximal exposure guidelines also taking into account long-term, non-thermal effects, and including especially vulnerable groups, such as the elderly, the ill, the genetically and/or immunologically challenged, children and fetuses, and persons with the functional impairment electrohypersensitivity.

In November, 2009, a Scientific Panel comprised of international experts on the biological effects of electromagnetic fields met in Seletun, Norway, for three days of intensive discussion on existing scientific evidence and public health implications of the unprecedented global exposures to artificial electromagnetic fields (EMF) from telecommunications and electric power technologies. This meeting was a direct consequence of on-going discussions already from the mid-nineties, when cellular communications infrastructure began to rapidly proliferate, and stretching through, among many, the Benevento (2006), Venice (2008) and London (2009) Resolutions from this decade, and involving important conclusions drawn from the 600-page Bioinitiative Report published August 31, 2007, which was a review of over 2,000 studies showing biological effects from electromagnetic radiation at non-thermal levels of exposure, which partly was published subsequently in the journal *Pathophysiology* (Volume 16, 2009).

The Seletun Scientific Statement (2011) recommends that lower limits be established for electromagnetic fields and wireless exposures, based on scientific studies reporting health impacts at much lower exposure levels. Many researchers now believe the existing safety

---

Mailing address	Visiting address	Telephone
Experimental Dermatology Unit	Retziuslaboratoriet	Direct 468-52 48 70 58
Department of Neuroscience	Retzius väg 8	Switchboard 468-52 48 64 00
Karolinska Institutet	Solna	Fax 468-30 39 04
171 77 Stockholm		Fax (KI) 468-31 11 01
Sweden		



limits are inadequate to protect public health because they do not consider prolonged exposure to lower emission levels that are now widespread.

The body of evidence on electromagnetic fields requires a new approach to protection of public health; the growth and development of the fetus, and of children; and argues for strong preventative actions. These conclusions are built upon prior scientific and public health reports documenting the following:

- 1) Low-intensity (non-thermal) bioeffects and adverse health effects are demonstrated at levels significantly below existing exposure standards.
- 2) ICNIRP/WHO and IEEE/FCC public safety limits are inadequate and obsolete with respect to prolonged, low-intensity exposures.
- 3) New, biologically-based public exposure standards are urgently needed to protect public health world-wide.
- 4) It is not in the public interest to wait.

- EMR exposures should be reduced now rather than waiting for proof of harm before acting. This is in keeping with traditional public health principles, and is justified now given abundant evidence that biological effects and adverse health effects are occurring at exposure levels hundreds to thousands of times below existing public safety standards around the world.

- There is a need for mandatory pre-market assessments of emissions and risks before deployment of new wireless technologies. There should be convincing evidence that products do not cause health harm before marketing. Such decisions may have to be quickly revised given new evidence.

- The use of telephone lines (land-lines) or fiber optic cables for SmartGrid type energy conservation infrastructure is recommended. Utilities should choose options that do not create new, community-wide exposures from wireless components of SmartGrid-type projects. Future health risks from prolonged or repetitive wireless exposures of SmartGrid-type systems may be avoided by using fiber-optic cable. Energy conservation is endorsed but not at the risk of exposing millions of families in their homes to a new, involuntary source of wireless radiofrequency radiation, the effect of which on their health not yet known.

I encourage governments to adopt a framework of guidelines for public and occupational EMF exposure that reflect the Precautionary Principle. The Precautionary Principle states when there are indications of possible adverse effects, though they remain uncertain, the risks from doing nothing may be far greater than the risks of taking action to control these exposures. The Precautionary Principle shifts the burden of proof from those suspecting a risk to those who discount it — as some nations have already done. Precautionary strategies should be based on design and performance standards and may not necessarily define numerical thresholds because such thresholds may erroneously be interpreted as levels below

---

Mailing address  
Experimental Dermatology Unit  
Department of Neuroscience  
Karolinska Institutet  
171 77 Stockholm  
Sweden

Visiting address  
Retziuslaboratoriet  
Retzius väg 8  
Solna

Telephone  
Direct 468-52 48 70 58  
Switchboard 468-52 48 64 00  
Fax 468-30 39 04  
Fax (KI) 468-31 11 01



**Karolinska Institutet**  
Department of Neuroscience  
Experimental Dermatology Unit

which no adverse effect can occur.

You often hear about "safe levels" of exposure and that there is "no proof of health effects", but my personal response to these seemingly reassuring statements is that it is very important to realize, from a consumer's point of view, that "no accepted proof for health effects" is not the same as "no risk". Too many times, 'experts' have claimed to be experts in fields where actually the only expert comment should have been: "I/we just do not know". Such fields were e.g. the DDT, X-ray, radioactivity, smoking, asbestos, BSE, heavy metal exposure, depleted uranium, etc., etc., etc., where the "no risk"-flag was raised before true knowledge came around. Later on, the same flag had to be quickly lowered, many times after enormous economic costs and suffering of many human beings. Along those lines, it is now (regarding "the protection from exposure to electromagnetic fields" issue) very important to clearly identify the background and employment (especially if they sit, at the same time, on the industry's chairs) of every 'expert' in different scientific committees, and likewise. It is, of course, very important (maybe even more important?) to also let 'whistleblowers' speak at conferences, to support them with equal amounts (or even more?) of economical funding as those scientists and other 'experts' who, already from the very beginning, have declared a certain source or type of irradiation, or a specified product, to be 100% safe.

In the case of "protection from exposure to electromagnetic fields", it is thus of paramount importance to act from a prudence avoidance/precautionary principle point of view. Anything else would be highly hazardous! Total transparency of information is the key sentence here, I believe consumers are very tired of always having the complete truth years after a certain catastrophe already has taken place. For instance, it shall be noted, that today's recommendation values for wireless systems, the SAR-value, are just recommendations, and not safety levels. Since scientists observe biological effects at as low as 20 microWatts/kg, is it then really safe to irradiate humans with 2 W/kg (i.e., with 100,000 times stronger radiation!), which is the recommendation level for us? And, furthermore, it is very strange to see, over and over again, that highly relevant scientific information is suppressed or even left out in various official documents, as high up as at the governmental level of society. This is not something that the consumers will gain anything good from, and, still, the official declaration or explanation (from experts and politicians) very often is: "If we (=the experts) would let everything out in the open, people would be very scared and they would panic." Personally, I have never seen this happen, but instead I have frequently seen great disappointment from citizens who afterwards have realized they have been fooled by their own experts and their own politicians... (cf. one such recent example from the WHO/IARC: <http://www.monanilsson.se/document/AhlbomConflictsIARCMay23.pdf>)

Another misunderstanding is the use of scientific publications (as the tobacco industry did for many years) as 'weights' to balance each other. But you can NEVER balance a report showing a negative health effect with one showing nothing! This is a misunderstanding which, unfortunately, is very often used both by the industrial representatives as well as official authorities. The general audience, naturally, easily is fooled by such an argumentation, but if

---

Mailing address	Visiting address	Telephone
Experimental Dermatology Unit	Retziuslaboratoriet	Direct 468-52 48 70 58
Department of Neuroscience	Retzius väg 8	Switchboard 468-52 48 64 00
Karolinska Institutet	Solna	Fax 468-30 39 04
171 77 Stockholm		Fax (KI) 468-31 11 01
Sweden		



**Karolinska Institutet**  
Department of Neuroscience  
Experimental Dermatology Unit

you are bitten by a deadly poisonous snake, what good does it make for you that there are 100 million harmless snakes around?

In many commentaries, debate articles and public lectures - for the last 20-30 years – I have urged that completely independent research projects must be inaugurated immediately to ensure our public health. These projects must be entirely independent of all types of commercial interests; public health cannot have a price-tag! It is also of paramount importance that scientists involved in such projects must be free of any carrier considerations and that the funding needed is covered to 100%, not 99% or less. This is the clear responsibility of the democratically elected body of every country.

Many wireless systems are close to beds, kitchens, playrooms, schoolrooms, and similar locations. These wireless systems are never off, and the exposure is not voluntary. These systems are being forced on citizens everywhere. Based on this, the inauguration of e.g. mobile telephony and wireless internet with grudging and involuntary exposure of millions to billions of human beings to pulsed microwave radiation should immediately be prohibited until 'the red flag' can be hauled down once and for all. This is of particular importance for pupils and staff in schools and for the people in residential areas with many children.

With my very best regards,  
Yours sincerely,

Olle Johansson, Assoc. Prof.,  
The Experimental Dermatology Unit,  
Department of Neuroscience,  
Karolinska Institute,  
171 77 Stockholm,  
Sweden  
&  
Professor,  
The Royal Institute of Technology,  
100 44 Stockholm,  
Sweden

---

Mailing address  
Experimental Dermatology Unit  
Department of Neuroscience  
Karolinska Institutet  
171 77 Stockholm  
Sweden

Visiting address  
Retziuslaboratoriet  
Retzius väg 8  
Solna

Telephone  
Direct 468-52 48 70 58  
Switchboard 468-52 48 64 00  
Fax 468-30 39 04  
Fax (KI) 468-31 11 01