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From: Mona Nilsson <[REDACTED]>
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To: Euro-Ombudsman
Subject: [EOWEB] Balance of experts in expert groups of the Commission
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Avsändare

Avsändare Mona Nilsson [REDACTED]
Datum Sunday, August 31, 2014 10:57:51 PM CEST

Din information

Del 1 - Kontaktinformation

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Språk på vilket du vill få ett svar en - English

Del 2 - Information

Ämne Balance of experts in expert groups of the Commission
Innehåll Please find enclosed our complaint in pdf on the lack of balance in expert group on EMF

European Ombudsman,

1 avenue du Président Robert Schuman, CS
30403, F - 67001 Strasbourg Cedex,

France

August 31, 2014

I hereby submit the complaint on behalf of the Swedish Radiation Protection Foundation regarding the lack of balanced representation of experts in the SCENIHR expert group on EMF (Electromagnetic Fields)

During the last 8 years the SCENIHR expert group on EMF has been composed of experts that have conflict of interests i.e. ties to industry that produces EMF/Mobile phone radiation. Furthermore the group is only composed of experts with a predetermined position that there are no risks with current allowed exposure levels and limits, so called intellectual bias. The group totally lacks balance as there is no whatsoever representation from the growing and substantial number of experts that at the contrary are of the opinion that the allowed limits are far too high and obsolete to protect the public from harm and that there are severe and multiple health risks with the radiation that are prevalent in our society today from both low – and high frequency electromagnetic radiation.

One example of experts that are never appointed and that are of a contradicting opinion is the more independent group of experts on the issue of EMF is the Bioinitiative Working Group. This group of 29 leading experts in the field of EMF health risks concluded that there are now abundant evidence for effects on reproduction, learning and memory, brain cells and DNA-damage on cells and that studies are accumulating that show that mobile phone use increase the risk of brain tumors in a low-to-normal user of today (30/minutes a day).

Below we reply to your questions:

- 1. Which specific Commission expert groups do you consider to lack a balanced representation of relevant areas of expertise and interest in their membership? What, according to you, is the root cause of the unbalanced composition of the Commission expert groups identified by you?*

The root cause is simple: Money. There are huge economic interests in this expert evaluation and any admitted health risk, in particular brain tumor and cancer risks and neurodegenerative effects, is a severe economic risk to the emf-producing industry (telecom, mobile phone producers, wireless laptop producers, power industry as well as the insurance industry). The economic impact would be huge.

- 2. The Commission's horizontal rules on expert groups allow for the Commission to appoint individual experts in their personal capacity. In your experience, does this pos-*

sibility give rise to concern in terms of the balanced composition of expert groups and/or conflicts of interest?

The experts in EMF group are not appointed on their personal capacity rather it seems they are appointed because they are a guarantee that business can go on as usual – no matter what hundreds of studies and thousands of suffering people are telling. All experts have declared multiple times before the evaluation that they are of the opinion that there are no health risks, while a large number of other experts that are not appointed or not accepted by the Commission although with similar qualifications are of the contradicting opinion.

- 3. Do you consider that the current level of transparency regarding the composition of Commission expert groups, in particular through the Register of Commission Expert Groups and Other Similar Entities, is sufficient? In particular, does the information made available by the Commission allow you to ascertain which interests are represented by the members of Commission expert groups? If not, where do you see room for improvement? Do you consider that the current level of transparency regarding the work of expert groups, in particular through the publication of agendas and minutes, is sufficient?*

Here is huge room for improvement. Transparency of how the experts are selected and on what grounds is totally absent.

- 4. Where the Commission publishes calls for application for membership in expert groups, do you consider that these calls provide for selection criteria which sufficiently take into account the need for a balanced composition of expert groups? If not, where do you see room for improvement? In your view, could the Commission do more to raise awareness about these calls, with a view to encouraging applications? If so, what concrete steps could it take in this regard?*

No it does not in the case of SCENIHR on EMF take into account at all the need for a balanced composition although the importance of this aspect has been communicated for years to the Commission from different groups, both at meetings in Brussels in 2009 and 2011 and already in 2006 as well as in written submissions on repeated occasions.

- 5. Do you have any experience in applying for membership in a Commission expert group? If so, did you face any problems in the application process? If not, are you aware of any such problems faced by civil society organisations? Based on your experience, do the costs inherent in participation/the lack of comprehensive reimbursement schemes discourage civil society organisations from applying for membership?*

Organizations like ours often lack economic resources and representatives have to pay their own travel and hotel expenses. A more generous compensation scheme would be favorable to a more balanced composition.

- 6. Please give us your views on which measures could contribute to a more balanced composition of Commission expert groups.*

The selection process could be improved only by more transparency and that there is a genuine will to achieve balanced group of experts. Today there seem to be no such will or ambition. A more balanced selection could be achieved only if there is more transparency in the selection process and that NGO:s are allowed to comment on proposed experts so that any lack of balance in proposed expert group composition can be corrected at an early stage of the process. There must be and change so that there is a real and declared ambition to include experts that:

- have no economic ties to industry whatsoever that have economic interests in the issue

- represent both side in issues where there are well known contradicting expert opinions/controversy in order to guarantee that both sides are represented as in the case of EMF.

Do you have any other comments?

The cost of inaction in front of evidence of huge health risks to the public and early warning scientists is in the long run very high. Therefore the cost to the European Community of ignoring the growing number of science that show evidence of harm will be very high. This means that the cost to the European Community and to the people in the EU will continue to grow and be very high if there is no change in the group of experts that are appointed. Unfortunately the short term economic interests are today allowed to have a heavier weight in society, i e those of the producer of harm, in this specific case the producers of harmful EMF. The SCENIHR expert group composition is a striking example of this serious erroneous system behavior.

We hope and trust it will change – for the benefit of the people in Europe.

I enclose our comment on the last SCENIHR EMF preliminary opinion.

Yours sincerely

Mona Nilsson

Chairman

Swedish Radiation Protection Foundation