HPS Specialists in Radiation Protection

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Secretary
U.S. Department of Health and Human Services, Washington, DC 20201

Subject: Health Physics Society Comments on the *Request for Information on Electromagnetic Fields (EMFs), Radiofrequency (RF) Radiation, and Wireless Radiation Exposure*

Docket HHS-OASH-2026-0397 | 91 FR 59792 (September 21, 2026)

Dear Secretary:

The Health Physics Society (HPS) appreciates the opportunity to comment on the U.S. Department of Health and Human Service's (HHS) request for Information on electromagnetic field (EMF) exposure and human health. The HPS is a nonprofit scientific and professional organization whose members specialize in radiation safety and protection across medicine, industry, academia, national laboratories, emergency response, and federal and state government. HPS submits these comments to assist HHS in their request for information.

A substantial body of experimental and epidemiological research has examined biological effects associated with radiofrequency electromagnetic field (RF or RFR) exposure, with studies reporting both positive and null findings.[1,2,3] However, the evidentiary significance of individual findings depends on methodological quality, exposure characterization, statistical precision, reproducibility, and biological relevance. Simply counting studies according to whether they report statistically significant findings is not a reliable method for determining the overall strength of scientific evidence.

HPS believes that HHS should not adjudicate complex questions involving toxicology, biology, dosimetry, epidemiology, statistics, and systematic-review methodology without relying on appropriate scientific expertise. Historically, the Federal Government has relied on expert organizations such as the National Council on Radiation Protection and Measurements (NCRP) and the Institute of Electrical and Electronics Engineers (IEEE) in developing and evaluating RF exposure limits.

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[1] Huss A, Egger M, Hug K, Huwiler-Müntener K, Röösli M. Source of funding and results of studies of health effects of mobile phone use: Systematic review of experimental studies. Environmental Health Perspectives. 2007;115(1):1–4. doi:10.1289/ehp.9149.
[2] Leach V, Weller S, Redmayne M. A novel database of bio-effects from non-ionizing radiation. Reviews on Environmental Health. 2018;33(3):273–280. doi:10.1515/reveh-2018-0017.
[3] Simkó M, Repacholi M, Foster K, Mattsson M, Croft R, Scarfi M. Exposure to radiofrequency electromagnetic fields and IARC carcinogen assessment: Risk of Bias preliminary literature assessment for 10 key characteristics of human carcinogens. Mutation Research/Reviews in Mutation Research. 2025, 796. 108545. 10.1016/j.mrrev.2025.108545.

Other competent agencies have also prepared critical reviews of specific topics, including the U.S. Food and Drug Administration's evaluation of electromagnetic fields and cancer.[4] HPS recommends that HHS continue to rely on qualified scientific organizations, expert review panels, and competent public-health and radiation-protection agencies when evaluating health effects from electromagnetic fields, radiofrequency radiation, and wireless radiation.

HHS should not base regulatory decisions on uncritical lists of reported effects or on vote-counting exercises. It should seek advice from experts with demonstrated competence in the relevant scientific disciplines and give primary consideration to systematic reviews and other evaluations that apply transparent methods for assessing study validity and the totality of the evidence.

The Health Physics Society appreciates HHS's consideration of these comments. As the scientific voice for radiation safety, the HPS stands ready to provide technical expertise to HHS in the area of nonionizing radiation safety.

Respectfully submitted,



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On behalf of the Health Physics Society

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[4] Review of Published Literature between 2008 and 2018 of Relevance to Radiofrequency Radiation and Cancer, published February 2020, https://www.fda.gov/media/135043/download, accessed 18 October 2026.