

Electro-Hypersensitivity Does Not Exist

Document 1 — The Ubiquity of Waves: Network Densification, the Erasure of White Zones, and the Condition of “Wave Refugees” in Europe

Comment submitted in response to the U.S. Department of Health and Human Services (HHS) *Request for Information on Electromagnetic Fields (EMFs), Radiofrequency (RF) Radiation, and Wireless Radiation Exposure*, FR Doc. 2026-19252, Docket HHS-OASH-2026-0397.

Questions addressed: 3; 11g; 15a, 15b, 15c; 18.

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The subjects addressed in this document are part of an open publication, intended to receive further testimonies and contributions.

Abstract

Drawing on European sources, this document describes how the radiofrequency environment to which the population is exposed has changed, and its consequences, particularly for the most receptive individuals, referred to here as electro-hypersensitive. It establishes three findings.

First, exposure to artificial high-frequency waves has become continuous: ambient levels have risen sharply since 1980, mobile networks are becoming denser, and national attention thresholds are being raised to keep pace with this densification.

Second, public policies for territorial coverage, including France’s 2018 New Deal mobile, are gradually eliminating the last areas without network coverage, which, for the electro-hypersensitive, are the only places where life remains possible.

Third, the result is a population of “wave refugees,” forced into displacement and precarious housing and, ultimately, into a de facto house arrest, through the inability to travel, and without guaranteed access to hospital care.

The document compares this situation with that of the United States, where the National Radio Quiet Zone in effect offers a refuge, and sets out four recommendations.

1. Purpose

The HHS Request for Information asks what types of scientific evidence should be considered when evaluating RF exposure associated with wireless infrastructure, in particular with regard to

proximity to homes, cumulative neighborhood exposure, and antenna density (Question 15), and invites those most directly concerned to describe their experiences (Question 3). It also asks about the situation of populations that may uniquely experience adverse effects (Question 11g).

This document answers from a European perspective. It does not address biological effects as such, which are covered in Documents 2, 4, 6, and 8, but the organization of the territory: the way in which network densification transforms the living conditions of the most sensitive human beings.

By electrosensitivity we mean a sensitivity to electromagnetic fields common to all human beings, to varying degrees, and by electro-hypersensitivity its highest degrees, which make life impossible in an exposed environment.

The name itself is debated. Ten to fifteen designations coexist worldwide for the same condition: electrosensitivity, electro-hypersensitivity, microwave syndrome, and, at the World Health Organization and Anses, “idiopathic environmental intolerance attributed to electromagnetic fields,” whose terms place the cause on the individual, or declare it unknown. In the United States, the OneName Project, launched on January 8, 2024, by five advocates, including the president of Environmental Health Trust, convened an eleven-member decision-making committee—physicians, scientists, a lawyer, and advocates from the United States, Canada, and Europe—which on December 10, 2024, chose the name *Electromagnetic Radiation Syndrome*, or *EMR Syndrome* for short, because it “places responsibility where it belongs—on environmental EMR exposure—not on the individual”; several American organizations have adopted it since ([OneName Project, 2025](#)). In these documents we use “electro-hypersensitivity,” the term in use in Europe, and, like the OneName Project, we regard it as a syndrome: a set of reactions of the body to an external source, not a disease.

2. Methods and Sources

The data gathered come from a documentary working database built since June 2026, in which each entry states its sources and their reading status. They are of four kinds: public data from the regulatory authorities (the French National Frequency Agency, ANFR; the French telecommunications regulator, Arcep); peer-reviewed publications; institutional texts (Council of Europe, prefectural orders, the referral to the French Defender of Rights); and advocacy and press sources, whose position is stated. The ANFR and Arcep data were consulted in their publications and online files, with the exception of the review of the New Deal mobile, cited from the press. The referral to the Defender of Rights, the Robin des Toits press release, and the video by [Milbert \(2016\)](#) are cited from our files, which reproduce their text or the relevant passages; the association pages and press articles were consulted online. Quotations in English are reproduced as written. Quotations from French and German sources are our translations; the original wording appears in the French version of this document. The court decisions mentioned are reported from the sources indicated. Private individuals are not named. Paragraph 8.1.4 of Council of Europe Resolution 1815 was checked against the adopted text on October 19, 2026.

3. The Densification of Radiofrequency Exposure (Questions 15b, 18)

3.1 Changes in Ambient Levels

In 1980, the U.S. Environmental Protection Agency (EPA) measured ambient radiofrequency levels at 486 sites in fifteen U.S. cities (Tell and Mantiply, 1980). An international study conducted in 94 microenvironments in six countries revisited one of those sites, in Los Angeles, and measured mean levels there seventy times higher than in 1980, with mobile telephony infrastructure as the leading contributor (Sagar et al., 2018, cited in Levitt et al., 2022).

3.2 Network Deployment in France

As of January 1, 2026, ANFR listed 71,344 authorized 4G sites and 53,718 authorized 5G sites in France (ANFR, 2026a); as of July 1, 2026, more than 55,600 5G sites were authorized (ANFR, 2026b). The 5G licenses require coverage of highways in 2025 and of main roads in 2027, and a throughput of at least 240 Mbit/s at all sites in 2030 (Arcep, 2019; see Document 5, Section 3.2).

3.3 Changes in Attention Thresholds

In France, the regulatory exposure limit for the public depends on frequency and reaches 61 V/m. Until 2025, a level above 6 V/m indicated an “atypical point,” calling for remediation by the operators. ANFR raised this threshold to 9 V/m throughout the territory as of January 1, 2026 (Devillers, 2026), on the grounds that the 6 V/m threshold “no longer appears suitable in a context of densification of mobile networks in cities” (ANFR, 2025). The attention threshold was thus adjusted to exposure, and not the other way around.

3.4 A Change in the Configuration of Sources

Radio and television broadcasting relied on a small number of powerful transmitters, located far from the public. Home Wi-Fi, connected devices, smart meters, and 5G small cells replace that model with a multitude of lower-power sources, installed as close as possible to users. Moreover, exposure is not limited to the field from base station antennas: where that field is weak, in rural areas, the user’s phone transmits more to maintain the link, as two recent studies conducted on French and Korean networks show (Liu et al., 2026; Lee et al., 2026). Our own observations, reported in the deposit text, bear witness to this from the second half of the 1990s onward.

4. The Erasure of White Zones: The New Deal mobile (Questions 15a, 15c, 18)

4.1 A Term with Two Meanings

In regulatory vocabulary, a “white zone” (*zone blanche*) refers to an area with no mobile coverage at all, which public policy aims to eliminate. In the vocabulary of the electro-hypersensitive, it refers to a place almost free of artificial radiation, which, on the contrary, must be preserved. This semantic collision sums up the conflict: what territorial planning seeks to eliminate is precisely what the electro-hypersensitive most need in order to live.

4.2 The Scheme and Its Results

The New Deal mobile, concluded in January 2018 between the French State and the four mobile operators, renewed the operators' frequency authorizations without a new auction, in exchange for coverage commitments, including 5,000 new sites in poorly covered areas. According to the review published by Arcep on February 1, 2024, the share of the territory in a 4G white zone fell from 11% in 2018 to 1.9% at the end of 2023; more than 2,600 sites of the targeted coverage scheme were in service as of September 30, 2023 ([Marzolf, 2024](#); [Maire-info, 2024](#)). The Association Zones Blanches (White Zones Association) observes that this agreement has “greatly multiplied the number of base station antennas on French territory,” making it more difficult to identify the living places free of electromagnetic fields that the electro-hypersensitive need ([AZB, 2023](#)).

4.3 Case Study: Two Valleys in the Vosges

The survey carried out on August 24, 2026, of the public data of Arcep and ANFR, and of the New Deal mobile list of “areas to be covered” ([Arcep, 2026](#); [ANFR, 2026c](#)), concerns two neighboring valleys in the Haut-Rhin department. On that date, the first had no antenna within its municipal territory and appeared on the scheme's list as an area to be covered (one site requested, none in service); the quarterly file of the scheme published by Arcep on September 24, 2026, however, reports as brought into service a site intended for a second area bearing the name of the municipality, near the summit of the Grand Ballon (according to our files; not cross-checked on Cartoradio). In the second valley, a 20-meter tubular tower, shared by the four operators, was built on October 16, 2024, within the boundaries of the Ballons des Vosges Regional Nature Park ([ANFR, 2026c](#)). An electro-hypersensitive individual noted in August 2026 that this tower is disguised as a fir tree; this camouflage does not appear in any of the public sources consulted. The case illustrates the advance of the scheme even into protected natural areas and the lack of information given to local residents (Question 9, addressed in Document 3).

4.4 No Protection for Travel

No arrangement currently protects the movement of the electro-hypersensitive, and no mobility corridor exists. The only territorial planning instrument concerned, the New Deal mobile, pursues the opposite objective: filling in the last uncovered spaces.

5. Wave Refugees (Questions 3, 11g)

5.1 Definition

We call “wave refugees” (*réfugiés des ondes*) the electro-hypersensitive human beings who seek a refuge and change their place of living to find one, as the networks expand. The expression is also used elsewhere, notably by a website devoted to electro-hypersensitivity, which describes these refugees as “prisoners of their homes, when their homes can still offer them a refuge” ([zerowavezone.com, 2025](#)).

5.2 Documented Trajectories

As early as 2012, members of the future Association Zones Blanches came to the aid of two electro-hypersensitive women who had taken refuge in a cave in the Hautes-Alpes department; their situation moved Member of the European Parliament Michèle Rivasi, who brought together around her the future board members of the association (AZB, 2026). This situation lies at the origin of the Association Zones Blanches, founded in December 2014, and of a project for the first European medical and social reception center for the electro-hypersensitive and the chemically sensitive, on a 63-hectare estate. The project was not carried out. In 2023, the association observed that “to this day, there is no public place in France where individuals who have become electro-hypersensitive (EHS) and/or chemically sensitive (MCS) can be sheltered” (a quotation recorded in our files, which we have not found on the association’s current website).

In 2015, an electro-hypersensitive individual settled in a state forest in the Alpes-de-Haute-Provence department that had no mobile coverage. The commissioning of an antenna there was announced for January 2024. In proceedings brought by the National Forests Office, the Digne-les-Bains Judicial Court recognized, on February 22, 2024, his right to remain on site, on the grounds that his condition did not allow him to live anywhere other than in a white zone; the Aix-en-Provence Court of Appeal overturned this judgment on April 29, 2025, relying on the 2018 report of Anses, the French Agency for Food, Environmental and Occupational Health & Safety (Devillers, 2025), and the individual concerned brought the case before the European Court of Human Rights in 2025 (according to our files).

In the summer of 2026, the Gironde prefectural order of August 4, 2026, prohibited unrestricted access to the forest areas, except for residents, because of the risk of fire (Gironde Prefecture, 2026). The association Robin des Toits points out that the authorities have overlooked a problem, “that of electro-hypersensitive individuals who, for lack of anything better, have taken refuge in the forests out of vital necessity,” and calls for them to be given “a place to live sheltered from all electromagnetic radiation” (Robin des Toits, 2026).

In Belgium, the head of an association that makes and delivers protective bed canopies reported, in May 2026, the case of a woman whose daughter “cannot bear being in the house because of the waves. she goes to sleep in the cellar” (Lerat, 2026a). The same association head told us that he previously received about one request for help per month, and that he now receives at least one per day (personal communication, September 2026).

Our own trajectory, set out in the deposit text, belongs to the same category: departure from Belgium, a survey of white and gray zones between Belgium and the south of France in 2019, successive moves ending in a withdrawal to a plot of land in the mid-mountains, a last refuge.

5.3 Precarious Places of Shelter

The existing places of shelter are few, most often private, and rarely lasting. In France, a reception area in a white zone, in the Haute-Saône department, is reserved for members of the association that manages it, which lists the departmental council among its partners (AEPOH, 2026); a few

private refuges operate without electricity or telephone, one of which, opened in 2018 in the Dolore gorges, was hosting five residents at the time of the report, some year-round, others for a few weeks or a few months. Its founder sums it up: “The EHS are normal human beings and want a corner of their own” (Goutelle, 2025). In Belgium, the association “Un lieu de vie pour EHS” (A Place to Live for EHS), whose house in a white zone was sold in March 2026 (according to our files), wrote on August 31, 2026, that it is “no longer a place of shelter” (Lerat, 2026b).

6. Mobility and Access to Care: A De Facto House Arrest (Questions 3, 11g, 18)

6.1 The Referral to the Defender of Rights

On October 20, 2022, nine French associations referred the situation of the electro-hypersensitive with regard to mobility to the Defender of Rights (CNAFAL et al., 2022). Public transportation has become inaccessible to them, because of passengers’ smartphones and on-board Wi-Fi. Only the private car remains, provided it is neither electric nor hybrid and takes the least covered secondary roads; according to the signatories, the communicating equipment made mandatory on new vehicles from July 2022 further reduces this possibility, without the buyer being able to know its emissions. The signatories conclude: “When it is no longer possible to travel, this amounts to a measure of de facto house arrest.” They add: “The discrimination we denounce unfortunately has no legal basis, but it is a de facto situation.”

Our own situation is an example: short distances remain feasible, but long ones are closed — air travel, large cities, the seaside, museums — and returning to our country of origin, Belgium, has become impossible for us.

6.2 Hospitalization and Residential Care for Older Adults

According to a physician who has followed electro-hypersensitive patients, “most [of the electro-hypersensitive] cannot be hospitalized,” because of staff phones, DECT cordless phones, and Wi-Fi, even in patient rooms (Milbert, 2016). Other countries show that a different organization is possible: Sweden has set up health care facilities where electromagnetic fields are very low (Sears, 2007), and Switzerland applies, in places of sensitive use, including hospitals, installation limit values about ten times lower than the immission limit values (Ordinance on Protection against Non-Ionising Radiation, ONIR; Swiss Federal Council, 1999). Regarding admission to retirement homes, we found, in France, neither studies nor practices adopted by facilities.

7. Elements of International Comparison (Questions 15, 18)

7.1 The National Radio Quiet Zone

The National Radio Quiet Zone, established in 1958 to protect radio astronomy observations at Green Bank and the radio receiving facilities of the U.S. Navy at Sugar Grove, West Virginia, covers approximately 13,000 square miles, or about 34,000 km² (Green Bank Observatory, 2026). It was not created for health reasons; several dozen electro-hypersensitive individuals have nevertheless

settled there, and they themselves estimate that there are at least 75 of them in Pocahontas County alone (Andrews, 2024). The United States thus has, in effect, a territory that functions as a refuge.

7.2 European Initiatives

In Europe, we identified only one comparable municipal decision taken on health grounds. In February 2022, the municipal council of Tintigny (Belgium) decided unanimously to “preserve white zones on the territory of the municipality for the benefit of electro-hypersensitive individuals” and not to authorize any antenna near the site concerned (Hanotiaux, 2023). In France, the Haute-Saône reception area mentioned above (Section 5.3) lists the departmental council among its partners, although we have not been able to establish the nature of this commitment. In Germany, a map maintained by a private individual lists, according to its own description, 5,546 low-exposure places, mostly located in open countryside and far from homes: these are places to rest, not places to live (diagnose:EHS, 2025).

7.3 Council of Europe Resolution 1815

On May 27, 2011, the Parliamentary Assembly of the Council of Europe recommended that member states “pay particular attention to ‘electrosensitive’ people who suffer from a syndrome of intolerance to electromagnetic fields and introduce special measures to protect them, including the creation of wave-free areas not covered by the wireless network” (Council of Europe, 2011, § 8.1.4). The French coverage policy launched seven years later pursued the opposite objective.

8. Discussion

The three findings follow from one another. Network densification and the multiplication of sources close to the body make exposure continuous, and attention thresholds follow this densification instead of containing it. At the same time, the New Deal mobile is eliminating the last low-exposure places: all that remains for the electro-hypersensitive is to move, as the networks expand, until they can no longer move at all. This development runs counter to paragraph 8.1.4 of Council of Europe Resolution 1815, which called for the creation of areas not covered by wireless networks. The National Radio Quiet Zone shows that a territory shielded from radiation can be established and maintained over the long term, even though that was not its purpose. Since emissions add up, domestic sources included, the protection of the electro-hypersensitive can rest neither on a few private refuges nor on the preservation of white zones alone: it requires both the reduction of exposure at the source throughout the territory and the preservation, and even the re-creation, of very-low-exposure zones.

9. Limitations

The findings of this document rest on public regulatory data for network densification and the erasure of white zones, and on advocacy, press, and field sources for the situation of the electro-hypersensitive. To our knowledge, there is no census of wave refugees in Europe: the trajectories presented are documented cases, not a representative sample. Arcep’s review of the New Deal

mobile is cited from press reports. The Vosges case study is a one-time survey. These limitations themselves point to a surveillance gap that Question 10 of the Request for Information invites us to fill.

10. Recommendations (Questions 3, 11g, 15, 18)

1. Reduce exposure at the source throughout the territory, domestic sources included, since emissions add up.
2. Preserve the white zones that remain and re-create others, by designating and protecting very-low-exposure zones dedicated to human health, on the model of the protection granted to Green Bank for radio astronomy, in accordance with paragraph 8.1.4 of Council of Europe Resolution 1815.
3. Once exposure has been reduced at the source throughout the territory, provide low-exposure travel routes, which cannot substitute for that reduction.
4. Provide very-low-exposure rooms in care facilities and in residential facilities for older adults, in addition to reducing exposure at the source.

Glossary

Term	Meaning
4G, 5G	Fourth and fifth generations of mobile telephone networks.
AEPOH	Association pour un espace protégé des ondes hertziennes (Association for a Space Protected from Hertzian Waves): French association that manages a reception area in a white zone in Haute-Saône.
ANFR	Agence nationale des fréquences (French National Frequency Agency): French public body responsible for managing radio frequencies and monitoring public exposure to waves.
Anses	Agence nationale de sécurité sanitaire de l'alimentation, de l'environnement et du travail (French Agency for Food, Environmental and Occupational Health & Safety): French public body, under the supervision of five ministries, responsible for health risk assessment.
Arcep	Autorité de régulation des communications électroniques, des postes et de la distribution de la presse (French Regulatory Authority for Electronic Communications, Postal Affairs and Print Media Distribution): independent French administrative authority which, among other things, sets the coverage obligations of operators.
Atypical point (<i>point atypique</i>)	In France, a place where the exposure level exceeds the threshold set by ANFR — 6 V/m until 2025, 9 V/m since January 1, 2026 — and calls for remediation by the operators.
AZB	Association Zones Blanches (White Zones Association): French association founded in December 2014 to create places of shelter for the electro-hypersensitive and the chemically sensitive.

Term	Meaning
Cartoradio	ANFR mapping website that lists authorized radio sites and publishes the results of exposure measurements.
Chemical sensitivity, multiple chemical sensitivity (MCS)	Syndrome of symptoms affecting several organs upon exposure to various chemical substances at concentrations well below those that affect the general population.
CNAFAL	Conseil national des associations familiales laïques (National Council of Secular Family Associations); French family association, first signatory of the 2022 referral to the Defender of Rights.
Council of Europe	Intergovernmental organization of 46 European states, distinct from the European Union; its Parliamentary Assembly adopted Resolution 1815.
Court of appeal (<i>cour d'appel</i>)	French second-instance court, which retries cases already decided at first instance.
DECT	Standard for household cordless phones, around 1.9 GHz; the base transmits even when idle, except in ECO mode.
Defender of Rights (<i>Défenseur des droits</i>)	Independent French administrative authority responsible, among other things, for combating discrimination and defending the rights of users of public services.
EHS	Abbreviation of “electro-hypersensitive” or “electro-hypersensitivity,” used by associations and in several quotations.
Electro-hypersensitivity, electrosensitivity	Electrosensitivity refers to a sensitivity to electromagnetic fields shared, to varying degrees, by all human beings; electro-hypersensitivity, to its highest degrees. We regard it as a syndrome, not as a disease (see Document 4, Section 3.1).
EPA	Environmental Protection Agency: U.S. federal agency for environmental protection.
European Court of Human Rights	Court of the Council of Europe, sitting in Strasbourg, responsible for ensuring compliance with the European Convention on Human Rights.
Gray zone	Area weakly covered by mobile networks, where exposure is reduced without being zero.
HHS	Department of Health and Human Services: U.S. federal health department, to which this contribution is addressed.
Internet of Things, connected devices	Set of devices and sensors connected to one another and to the network, most often by radio link.
Judicial court (<i>tribunal judiciaire</i>)	French civil court of first instance.
Microenvironment	Typical place of everyday life — street, station, transport, office — where exposure is measured.
National Forests Office (<i>Office national des forêts</i>)	French public body responsible for managing public forests.
National Radio Quiet Zone	Radio quiet zone of approximately 13,000 square miles established in 1958 in the United States, between Green Bank and Sugar Grove, West Virginia, to protect radio astronomy observations and U.S. Navy radio receiving facilities.

Term	Meaning
New Deal mobile	Agreement concluded in January 2018 between the French State and the mobile operators: renewal of frequencies without auction, in exchange for territorial coverage commitments.
OneName Project	Initiative launched in 2024 in the United States to unify the naming of disorders attributed to electromagnetic fields; its decision-making committee chose the name <i>Electromagnetic Radiation Syndrome</i> (EMR Syndrome) in December 2024.
ONIR (ORNI in French)	Swiss Ordinance on Protection against Non-Ionising Radiation: it sets immission limit values, applicable everywhere, and, in places of sensitive use, installation limit values about ten times lower, as a precaution.
Places of sensitive use	Under Swiss law, premises where human beings regularly stay for prolonged periods — homes, schools, hospitals, permanent workplaces — and playgrounds, where the installation limit values apply.
Protective bed canopy	Canopy over a bed, made of conductive fabric, intended to reduce exposure to electromagnetic fields during sleep.
Regional nature park (<i>parc naturel régional</i>)	French rural territory classified for the value of its natural and cultural heritage, and managed according to a charter.
Resolution 1815	Resolution adopted on May 27, 2011, by the Parliamentary Assembly of the Council of Europe on the potential dangers of electromagnetic fields and their effect on the environment.
Robin des Toits	French association committed to combating exposure to electromagnetic waves.
Small cell	Low-power, short-range antenna installed close to the ground, on street furniture or building facades; “small-area wireless access point” in European Union law.
Smart meter	Electricity, gas, or water meter that transmits its readings remotely, by radio link or by power line communication.
State forest (<i>forêt domaniale</i>)	Forest owned by the State, managed in France by the National Forests Office.
Targeted coverage scheme (<i>dispositif de couverture ciblée</i>)	Component of the New Deal mobile through which the State designates, by order, areas to be covered that the operators must serve within a set time frame.
V/m	Volt per meter: unit of measurement of the electric field.
“Wave refugees” (<i>réfugiés des ondes</i>)	Electro-hypersensitive individuals forced to change their place of living to find a refuge, as the networks expand (see Section 5.1).
White zone	In territorial planning, an area without mobile coverage, which public policy aims to eliminate; for the electro-hypersensitive, a place almost free of artificial radiation, which must be preserved (see Section 4.1).
Wi-Fi	Wireless local area network, around 2.4, 5, and 6 GHz.

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