



21st October 2026

International EMF Alliance - Submission to the US Department of Health and Human Services

Re: Request for Information on Electromagnetic Fields, Radiofrequency Radiation and Wireless Radiation Exposure - Docket: HHS-OASH-2026-0397

The International EMF Alliance (IEMFA) respectfully submits this contribution to the US Department of Health and Human Services (HHS) review of electromagnetic field exposure and human health.

IEMFA brings an international perspective informed by collaboration among organisations and individuals concerned with electromagnetic field exposure, scientific research, public health and environmental protection.

We encourage HHS to consider the breadth of international scientific literature, the diversity of scientific assessments and the experiences of communities reporting health concerns. We also recommend that the review identify uncertainties and research gaps, assess the quality of the available evidence, and consider urgent precautionary measures to protect public health.

Review of international evidence and exposure guidelines

HHS should also examine whether existing exposure assessment methods adequately reflect real-world conditions, including multiple sources, changing exposure over time and exposure in homes, schools and workplaces.

International collaboration and the Seletun Statement

IEMFA's origins are closely connected with international efforts to bring independent scientists and public-interest organisations together to examine electromagnetic field health risks.

In 2009, an international gathering of scientists in Seletun, Norway, brought together researchers to discuss the scientific evidence and recommendations for protecting public health. These discussions were subsequently reflected in the peer-reviewed publication:

Scientific Panel on Electromagnetic Field Health Risks: Consensus Points, Recommendations, and Rationales, published in *Reviews on Environmental Health* in 2010.

Reference: <https://pubmed.ncbi.nlm.nih.gov/21268443/>

The Seletun Statement called for a more precautionary approach to electromagnetic field exposure and for exposure guidelines informed by the broader scientific literature.

We recommend that HHS review this publication, its supporting evidence and subsequent developments in the scientific literature.

Further information about the 2009 meeting is available at:

<https://www.iemfa.org/stavanger-2009/>

The contribution of Sissel Halmøy and international cooperation

Sissel Halmøy, Chair of the International EMF Alliance, has played an important role in international efforts to raise awareness of electromagnetic field exposure and encourage scientific investigation.

With a background in engineering and cybernetics, Sissel brought a systems-based approach to questions concerning exposure, reported health effects and the need for independent assessment.

Her experiences, together with those of people reporting electromagnetic sensitivity, helped motivate efforts to encourage scientists, public-interest organisations and affected individuals to engage in a more open discussion about electromagnetic fields and health.

Our international work included the organisation of scientific discussions in Norway, participation in international events in the United States and Europe, and engagement with researchers investigating biological effects of electromagnetic fields.

Athens 2014 From Science to Policy and Public Awareness

In March 2014, Sissel Halmøy and I participated in the international workshop *Electromagnetic Fields and Health Effects: From Science to Policy and Public Awareness*, jointly organised by the European Commission and the Greek Atomic Energy Commission (GAEC).

The workshop provided an important opportunity to bring scientific research, public-health policy and public concerns into the same discussion.

Sissel presented ***Houston, We've Got a Problem!***, drawing on her engineering background and personal experiences to raise questions about electromagnetic field exposure and the need for appropriate health protection.

My own presentation also addressed my reasons for becoming involved in this work, including my personal health history and experience of living close to a mobile phone mast. These experiences contributed to my determination to seek independent scientific investigation and to ensure that concerns raised by members of the public were heard.

Our participation reflected a wider effort to bring questions about electromagnetic field exposure, the interpretation of scientific evidence and the adequacy of existing exposure guidelines into international policy discussions.

The presentations and workshop documentation are available through the following European Commission records:

- Sissel Halmøy's presentation:
https://health.ec.europa.eu/document/download/49192af0-6921-42cf-8886-e1a807f981f4_en?filename=ev_20140328_co13_en.pdf

- My presentation: https://health.ec.europa.eu/document/download/5f4c2c79-f45b-4201-938f-9cf24c492c75_en?filename=ev_20140328_co14_en.pdf

We encourage HHS to consider these records as part of the historical development of international discussions about electromagnetic fields and public-health policy.

International Scientific Collaboration: Professor Yuri Grigoriev

Professor Yuri Grigoriev welcomed us into his home in Moscow, and our relationship developed beyond professional contact into a valued friendship.

Professor Grigoriev held senior scientific positions in Russia and contributed to national and international discussions concerning non-ionising radiation and public-health protection. His work formed part of a broader international debate about exposure standards, children's exposure and the interpretation of research into possible health effects associated with electromagnetic fields.

Our visit was particularly significant because it allowed us to learn more about the Russian approach to electromagnetic field protection and to exchange perspectives with colleagues working in a different regulatory and scientific environment.

Professor Grigoriev died in April 2021. His scientific work and his contribution to international discussions on electromagnetic fields remain relevant to understanding the history of this field.

One important resource is his book, *Frequencies Used in Telecommunications: An Integrated Radiobiological Assessment*, which is available to download free of charge through Orsaa:

https://www.orsaa.org/uploads/6/7/7/9/67791943/frequencies_used_in_telecommunications_an_integrated_radiobiological_assessment_draft_v3.pdf

I recommend that HHS examine the book and its underlying scientific references alongside other relevant international publications and assessments. Particular attention should be given to the evidence and reasoning concerning exposure standards, children and long-term exposure. This review should include a comparison with the exposure limits and public-health protection approaches adopted in Russia, where limits for radiofrequency exposure have historically been substantially lower than those used in the United States and other countries. HHS should examine the scientific rationale behind these differences, including the assumptions, evidence and precautionary considerations.

Our experience of working with Professor Grigoriev reinforced the importance of international scientific exchange, independent research and open discussion about the evidence informing public-health decisions.

Continuing the International Discussion: Dr Oleg Grigoriev

The work of Dr Oleg Grigoriev also forms part of the international discussion about electromagnetic field exposure and public-health protection. His presentations and publications provide additional material for HHS to consider when examining different national approaches to exposure standards and the protection of children.

Relevant material from his presentations for the Radiation Research Trust includes:

- Health and EMF Exposure: Protocol for Diagnostics and Therapy, presented in London in January 2010: https://radiationresearch.org/wp-content/uploads/2018/03/20100111_grigoriev_presentation.pdf
- Electromagnetic Pollution and Reaction of the Central Nervous System, presented at the June 2015 Non-Ionising Radiation and Health Concerns Seminar in London: <https://www.youtube.com/watch?v=82zlgghOKN24>

These resources complement the historical account of IEMFA's international collaboration and identify further material that may assist HHS in evaluating the diversity of scientific views and research priorities..

Independent research and emerging scientific questions

IEMFA encourages HHS to examine relevant international research investigating biological and health effects associated with electromagnetic field exposure.

One example is the peer-reviewed research by Lukas Margaritis and colleagues:

Drosophila oogenesis as a bio-marker responding to EMF sources, *Electromagnetic Biology and Medicine*, 2014; 33(3):165–187.

Reference: <https://pubmed.ncbi.nlm.nih.gov/23915130/>

This research provides an example of experimental work investigating biological responses to electromagnetic fields. Its findings, methods and relevance to human health should be considered in the context of the wider evidence.

Community observations and reported electromagnetic sensitivity

Organisations working with communities can help identify health concerns and questions that merit systematic investigation.

We recommend that HHS consider transparent methods for documenting and investigating reported illness clusters, symptoms and concerns about exposure.

Children, schools and long-term exposure

We recommend that HHS prioritise the identification of evidence gaps concerning children, pregnancy, and long-term exposure.

Research should consider realistic exposure conditions in homes, schools and workplaces, as well as the cumulative contribution of multiple sources.

In Memory of Professor Yuri Grigoriev: A Final Word on Children and the Future

I would like to conclude by recalling the words of the late Professor Yuri Grigoriev, a distinguished radiation scientist whose concerns about the expanding electromagnetic environment, and particularly its implications for children, deserve to remain part of the international discussion.

When I asked him about the growing proliferation of electromagnetic fields, he gave me a response I have never forgotten:

“Man conquered the Black Plague, but he has created new problems – EMF pollution.”

Professor Grigoriev was especially concerned about the exposure of children and the potential consequences for future generations.

Professor Grigoriev's expressed scientific concerns that underline the importance of continuing independent research, examining whether existing exposure guidelines adequately address long-term and cumulative exposure, and giving particular consideration to children's development and the environments in which they learn, sleep and grow.

The questions he raised should serve as a call for rigorous investigation, transparent assessment of the evidence, and responsible public-health decision-making.

Our responsibility is to ensure that technological progress does not outpace our commitment to protecting human health, especially the health of children and future generations.

In submitting this response, the International EMF Alliance respectfully asks the US Department of Health and Human Services to give serious consideration to the outstanding scientific questions, the need for independent research, and the case for a precautionary, evidence-informed approach to RF-EMF exposure.

Professor Grigoriev's words remain a reminder of the responsibility we share to ask difficult questions today, rather than leave unanswered questions to the next generation.

Recommendations to HHS

The International EMF Alliance respectfully recommends that HHS:

1. Conduct a transparent comparison of US and international exposure guidelines and their scientific foundations.
2. Review relevant international scientific publications and historical assessments, including the Seletun Statement and its supporting evidence.
3. Identify gaps in long-term research and real-world exposure assessment, particularly concerning children and other potentially vulnerable populations.
4. Support independent research, replication, transparent reporting and access to relevant data.
5. Establish appropriate methods for investigating reported health concerns and community illness clusters.
6. Ensure that people reporting electromagnetic sensitivity receive urgent attention and support.
7. Evaluate urgent measures to reduce exposures.
8. Communicate scientific findings, uncertainties and research priorities clearly to the public.

We respectfully ask HHS to consider the international experience and scientific resources identified in this submission when developing its research priorities and recommendations.

Respectfully submitted,

Eileen O'Connor

Co-founder of the International EMF Alliance (IEMFA) and Board Member