



**Patras Civic Association for the
Health Protection from
EMF Radiation**
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Προς: Hellenic Telecommunications and Post Commission (EETT) / info@eett.gr

Patras: 9/03/2023

Subject: Specific Absorption Rate tests

Dear Madam/Sir,

We are writing to you in the context of your responsibility as national telecom regulator for the transmitting devices on the market such as cell phones, tablets and other connected objects. In this capacity and in the framework of European regulations, you are responsible for the safety and health of people using these devices put on the market in our country.

We would therefore like to know whether your agency has carried out specific absorption rate (SAR) tests of electromagnetic radiation from mobile phones, tablets and connected objects on bodies (head, trunk and limbs), and if so, under what conditions (products supplied by the manufacturer or taken from a shop).

If tests have been carried out, we would like all test reports to be sent to us and made public.

In France, as early as July 2016, legal actions were set up, by Dr. Marc Arazi, founder of the NGO Phonegate Alert, resulting in the *Agence nationale des fréquences* (ANFR) publishing hundreds of SAR test reports that were made since 2012 without having been published. Since June 2018, [an official DATA site](#) has therefore allowed them to be listed. To date, more than 750 mobile phone SAR test reports are directly accessible to the public via this site.

Following these tests, [thirty mobile phone models](#) were considered non-compliant by the ANFR. Measures were therefore taken either to withdraw them from the market or to require the manufacturer to update the SAR value of its product by means of a software update.

We would therefore like to know whether these models, which are deemed to be non-compliant in France, have been the subject of particular attention from your services? And what measures have you taken to ensure consumer safety?

Following the revelations of these significant SAR limit violations, the French public authorities asked the health agency ANSES, to give its opinion on the possible related health risks. In a [report published in October 2019](#), ANSES recommended to public authorities:

- To withdraw or update mobile phones placed on the market before June 2017 tested by ANFR with a SAR exceeding regulatory levels. This corresponds to more than [250 models](#).

- To test all SARs in direct contact with the skin, i.e. at 0 mm, and in particular the trunk SAR which is still measured at 5 mm.

We would like to know if you have been informed of the recommendations made by ANSES. And now that we have focused your attention on this recommendation, what do you intend to do, given that a large proportion of these models have been placed on the French national market and may be on the national market in our country.

Do you plan to perform SAR measurements yourself or in cooperation with other authorities, for mobile phones used on the national market in line with the recommendations of ANSES?

France has decided, in line with the recommendations made by ANSES, to lodge a [formal objection with the European Commission](#) to request a measurement on the trunk of the SAR at 0 mm. We would therefore like to know whether your agency is in favor of this request and would support the French proposal in the appropriate EU bodies?

In addition, we have been informed by studies of Mr Christos Georgiou, Professor Emeritus of Biochemistry at the Department of Biology of the University of Patras, on the following serious issue related to the above, and we would like your comments on it:

The organization that set the "safety" limits, ICNIRP, admits in a paper that the current limits for safe exposure to EM radiofrequencies not only do not apply in practice but are violated by devices located very close to our bodies, e.g., less than 30 cm. It is the near field length of the antenna, e.g., of a mobile phone (placed in contact with our ear) or a laptop/tablet (usual holding distance, especially by young children), where we receive radiation higher than the applicable limit.

ICNIRP admits this as follows: ("Near-field exposure situations, localized and non-uniform field exposure are of special interest. Examples of typical EM sources with near-field exposure are hand held mobile telephones, inductive or capacitive heating equipment, anti-theft devices or electric appliances in homes and workplaces. Such devices can emit localized fields in excess of the reference levels")

[Sources: 1.<https://www.icnirp.org/cms/upload/publications/ICNIRPUseEMFgdl.pdf>,
2.Georgiou et al. (2022). Physical differences between man-made and cosmic

microwave electromagnetic radiation and their exposure limits, and radiofrequencies as generators of biotoxic free radicals. *Radiation 2: 285-302*].

This letter is written in cooperation with Dr. Marc Arazi, Phonedate Alert by Europeans for Safe Connections and has been sent to the European national telecom regulators.

We look forward to hearing from you.

Please allow us to contact you again if we do not receive a reply within one month.

Please send the answers to my email.

Kind regards,

For the association,

The President

Andronike Lefa

The Secretary

Vassilis Anastassopoulos