

**Comments on  
California Council on Science and Technology's Smart Meter Report,  
January 2011  
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This report ignores a fundamental public health principle: prevention of harm through a precautionary approach, based on evidence of harm rather than absolute proof of harm. CCST dismissed the substantial body of evidence indicating that *non-thermal* effects of radiofrequency radiation (RF) are real and include cancer as well as neurological effects.<sup>1</sup> *There are no federal standards for RF exposure based on long-term, chronic exposure or on non-thermal effects*, precisely the type of exposure from smart meters and the most likely to cause human health effects. Even standards for personal wireless devices such as cell phones are based solely on absorbed heat, measured by a unit called the Specific Absorption Rate (SAR).

This report also fails to consider the total exposure to RF, which has increased exponentially because of cell phone antennas and broadcast towers. Wi-Fi networks blanket entire neighborhoods and cities as well as homes, schools, cafes and stadiums. Smart meters add one more layer of involuntary chronic exposure to RF.

It is misleading to compare smart meters to cell phones and other wireless devices that are used voluntarily and that some people choose not to use because of the potential health effects. Mandating wireless smart meters in homes is radiation without representation: an infringement of personal and property rights.

As epidemiologist John Goldsmith wrote in 1995, "There are strong political and economic reasons for wanting there to be no health effect of RF/MW (radiofrequency/microwave) exposure, just as there are strong public health reasons for more accurately portraying the risks. Those of us who intend to speak for public health must be ready for opposition that is nominally but not truly scientific."<sup>2</sup>

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<sup>1</sup>BioInitiative Working Group. Cindy Sage and David O. Carpenter, Eds. (2007). BioInitiative Report: A rationale for a biologically based public exposure standard for Electromagnetic Fields (ELF and RF). [www.bioinitiative.org](http://www.bioinitiative.org)

<sup>2</sup>Goldsmith J (1995). Epidemiologic evidence of radiofrequency radiation (microwave) effects on health in military, broadcasting, and occupational studies. *International Journal of Occupational and Environmental Health* 1:47-57.