



ETNO response to the Scientific Committee on Health, Environmental and Emerging Risks (SCHEER) Preliminary Opinion on Radiofrequency

ETNO would like to welcome this opportunity to comment on the preliminary Opinion on the need of a revision of the annexes in the Council Recommendation 1999/519/EC and Directive 2013/35/EU, in view of the latest scientific evidence available with regard to radiofrequency.

ETNO supports revision of the annexes in the EU Council Recommendation 1999/519/EC and Directive 2013/35/EU based on the updated ICNIRP guidelines (2020). In addition, we propose that **each Member State applies them and does not impose more stringent limits, nor other conditions, than defined in the annexes.**

More specifically, ETNO strongly urges that each Member State and municipality aligns with the EMF limits defined by ICNIRP. Stricter limits, not based on scientific evidence, confuse the citizens of the Member States. They also lead to worse network capacity, and even difficulties fulfilling coverage obligations and deploying new technologies. They limit cell range and limit possibility to deploy new bands per site. This leads towards much denser networks, which may be challenging due to deployment restrictions. Moreover, higher number of network equipment leads to higher energy consumption and carbon emissions in manufacturing and in operation. The need to keep single antenna site emissions below stricter limits may also slow down the migration from a “stable” technology to an emerging one, due to the need to ensure the continuity of legacy services.

ETNO (European Telecommunications Network Operators' Association) represents Europe's telecommunications network operators and is the principal policy group for European e-communications network operators. ETNO's primary purpose is to promote a positive policy environment allowing the EU telecommunications sector to deliver best quality services to consumers and businesses.

For questions and clarifications regarding this position paper, please contact:

- **Maarit Palovirta** (palovirta@etno.eu), Senior Director of Regulatory Affairs at ETNO.
- **Xhoana Shehu** (shehu@etno.eu), Policy Manager, ETNO.