

From: [REDACTED]
To: DigitalConnectivity
Subject: A Consultation on the State's Digital Connectivity Strategy - [REDACTED]
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Consultation Question 1:

The ambition level in the Digital Connectivity Strategy is completely inappropriate as it aims to increase public exposure to wireless radiation across the state which has been demonstrated in thousands of independent studies to have adverse effects on health, all wildlife and the environment. The effects would be compounded by the government's drive to roll out 5G technology which would not replace the existing 2G, 3G and 4G technology but operate in conjunction with them. The Strategy is also highly inappropriate in light of the current energy crisis and the huge increase in energy consumption which would be required for base stations, masts, data centres, manufacturing of new electronic devices and 'smart' infrastructure for 5G technology and which would result in billions of extra tonnes of carbon dioxide released into the atmosphere.

Consultation Question 3:

The EU's European Electronic Communications Code is identified in the strategy as being of prime focus in the context of strategic enablers. This would revise the regulatory framework for the telecommunications sector in such a way that would provide sweeping exemptions to the industry and facilitate the widespread installation of small cell 5G, Wi-Fi or any wireless antennae without public consent and in particular would result in no safe place to live and work for the people within our population suffering from electromagnetic hypersensitivity (EHS). The EHS population in Ireland is a growing one as more people are starting to be affected and it's likely the numbers will increase as more 'smart' infrastructure is installed.

Consultation Question 4;

The Department of Environment, Climate and Communications is responsible for policy relating to the health effects of non-ionising radiation including EMFs and is assisted in this role by the Environmental Protection Agency, neither of which are competent bodies in the field of health. Responsibility for public exposure and health effects of EMFs should be transferred to the Department of Health which should oversee the Digital Connectivity Strategy and ensure that safer wired broadband should be used instead of wireless. The Department of Health should also enforce the European Directive "Safety, Health and Welfare at Work (Electromagnetic Fields) Regulations 2016 which identify groups as being "at particular risk" and impose duties on employers to avoid and reduce risks from EMFs and when to carry out risk assessments etc.

Consultation Question 6 (other general observations):

- the use of wired technology which is safer, faster, more reliable and more cyber secure than wireless telecommunications should be prioritised and incentivised;
- grants of planning permission for telecommunications structures with antennae, dishes etc. should cease especially next to homes, schools, hospitals etc. and especially where there are already existing structures in place;
- special attention should be given to ensuring safety in schools and early childhood care and education settings so that there is no exposure to wi-fi, including by strictly regulating the use of mobile phones by schoolchildren on school premises and by installing hardwired networks only;

- the recommendations of the 2005 report on Non-ionising radiation from mobile phone handsets and masts by the Joint Committee on Communications, Marine and Natural Resources should be implemented;
- the policy of only requiring wireless technology to conform with ICNIRP guidelines which have been widely condemned should be brought to an end and independent EMF and health scientists should be immediately appointed, without industry influence and with no conflicts of interest, for the purpose of establishing new safety standards for RF radiation for Ireland, that are not based only on power levels, that consider cumulative exposure, and that protect against all health and environmental effects, not just thermal effects and not just effects on humans;
- information and awareness-raising campaigns on the risks of potentially harmful long-term adverse effects on health should be put in place. This would be in keeping with the advice of Chief Medical Officer, Tony Holohan in 2011 who said that there was a “general consensus that children are more vulnerable to radiation from mobile phones than adults” and advised that young people should be encouraged to use mobile phones for 'essential purposes only' and all calls should be kept short, as talking for long periods prolongs exposure to radiofrequency electromagnetic fields;

legislation should be introduced which requires warning labels to be put on all mobile phones sold in Ireland clearly stating that mobile phones emit electromagnetic radiation, and that users should keep the device away from the head and body.

