

From: [EHS Ireland](#)
To: [DigitalConnectivity](#)
Subject: A Consultation on the State's Digital Connectivity Strategy
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To [REDACTED], DECC

[REDACTED] please find attached a submission re the public consultation on the State's Digital Connectivity Strategy.

Thank you for this opportunity,

[REDACTED]
on behalf of Electromagnetic Sense Ireland (ES-Ireland) at es-ireland.com

Please acknowledge receipt of same

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A Consultation on the State's Digital Connectivity Strategy Submission on behalf of Electromagnetic Sense Ireland (es-ireland.com)

██████████, March 2022 - (six pages)

Thank you for the opportunity to be actively involved in critically examining The Digital Connectivity Strategy for Ireland 2022 produced by the Department of the Environment, Climate and Communications (DECC). The Strategy asserts that Ireland needs a national network of digital connectivity in order to deliver economic prosperity and social inclusion. This requires facilitation of the joining up of national networks for libraries, schools, garda stations, health centres, public services and other Government service providers; Connection Points and Connected Hubs as well as the proposed 300 'publicly accessible' sites to be set up in communities across the State creating accessibility for every citizen. The Strategy is also proffered as an enabler of greater remote working, greater access to regional talent and skills, rural regeneration and of crossing of the digital divide through inclusivity – all admirable aspirations.

While the fundamental emphasis of the Strategy is on economics and business, this submission is forwarded by way of ensuring that the impacts of the technology used to enable the accomplishment of this vision, particularly the acceleration in the use of non-ionising pulsed microwave Electromagnetic/ Radiofrequency Radiation (EMF/RF), will be taken into account.

The current majority scientific opinion regarding the artificial EMF/RF we use for the digital connectivity of our computers, laptops, mobile phones, wireless baby monitors and all things 'smart' is very clear and provides enough evidence of harm to humans, wildlife, the environment, climate and the planet for a thorough review of the basic foundation upon which it is dependent i.e. the standards or guidelines being used. Standards adopted in Europe have been produced by the International Commission on Non-ionising Radiation Protection (ICNIRP) and are based upon scientific experiments undertaken in 1953, presented at an International Symposium on Biological Effects and Health Hazards of Microwave Radiation, in Warsaw in 1973. Harm was only found pertinent at a thermal level and that conclusion continues to be used today, despite the acceleration in the use of EMF/RF since then and the current overwhelming and growing accumulation of evidence of biological harm at non-thermal levels of emissions of EMF/RF. For further in-depth analysis of the ICNIRP guidelines please see our submission to Government Departments, State Bodies and others: *Are the Electromagnetic Radiation Guidelines Currently Being Used, Particularly Those for Wireless Telecommunications, Protective of our Health?* December 2021.

<https://es-ireland.com/2021/12/16/december-2021-ecsubmission-to-irish-government-on-icnirp-guidelines/>

Another basic problem seems to exist based on the difference between natural electromagnetic fields and man-made artificial electromagnetic fields, which are always polarized, and this fact renders them to be more bioactive. (*Polarization: A Key Difference between Man-made and Natural Electromagnetic Fields, in regard to Biological Activity.* D. Panagopoulos, O.Johansson and G. Carlo – *Scientific Reports*, volume 5 article number: 14914 (2015) <https://www.nature.com/articles/srep14914.pdf>

In order to create a safe and secure Digital Connectivity Strategy for Ireland the basics i.e. the RF radiation standards/guidelines, the regulatory standards for service providers, the possible inaccuracies in the obsolete science being used, all need to be re-examined and current science regarding health effects should be brought to the fore to ensure protection of all living things.

SOCIAL INCLUSION

It is estimated that between 3% to 5% of the populations across Europe, including Ireland, are suffering from the environmental impairment Electrohypersensitivity (EHS) also known as microwave sickness. The increasing numbers of those affected runs parallel with the relatively recent but exponential rise in the use of EMF/RF radiation to facilitate the use of increasing technological devices. The report from the European Economic and Social Committee (EESC) regarding the creation of a Digital Europe, *Digitalisation – Challenges For Europe 2019* considers EHS amongst the impacts of

the digitalisation of Europe and recognises that rather than being socially inclusive for this group, digitalisation will 'result in limited access to many public or private facilities, especially in buildings where devices have been installed for transmitting wireless technology.' *Digitalisation – Challenges for Europe*, EESC (Rapporteur: Bernardo Hernandez Bataller page 85) https://www.eesc.europa.eu/sites/default/files/files/qe-01-19-295-en-n.pdf?fbclid=IwAR3ozMC1Oz5FIAKiTYI856GbZQHs9upYYC5fLDEF_4yzKd5AbwgRkkphJ2I

This acknowledgement of the plight of those who are EHS may sound alarming but within our own population in Ireland there are children who cannot attend school due to feeling unwell around WiFi networks, young adults who have had to leave their employment, those who have lost their homes, those who cannot stay in their homes or cannot leave them, families destroyed due to lack of understanding when one member is suffering, and people, including the elderly, who travel the roads seeking a safe place to sleep.

The most noted symptoms of EHS are extreme pressure in the head, burning skin, brain fog, severe pain especially in head, muscles and limbs, palpitations, eye and ear problems, insomnia, vertigo, skin tingling, skin rashes and 'microwave hearing' etc. Long-term effects can include Cancer, Neurological/Neuropsychiatric effects, Anxiety and Stress, Alzheimer's, Autism, Genetic effects such as male sterility, significantly decreased sperm counts, DNA damage, Miscarriage and Birth defects, Asthma, Diabetes, Thyroid dysfunction, Bleeding disorders. (BioInitiative Report 2012) <https://bioinitiative.org/conclusions/>

A recent Supreme Court Case in the USA taken by The Environmental Health Trust (EHT) and the Children's Health Defence (CHD) against the Federal Communications Commission (FCC i.e. equivalent of our ComReg) for their use of EMF/RF guidelines that are obsolete and do not provide protection was supported by the submission of 1,742 filings from scientists and other professionals. <https://ehtrust.org/in-historic-decision-federal-court-finds-fcc-failed-to-explain-why-it-ignored-scientific-evidence-showing-harm-from-wireless-radiation/#:~:text=Today%20the%20United%20States%20Court,was%20%E2%80%9Carbitrary%20and%20capricious.%E2%80%9D>

Another filing presented in a case about 'smart' meters at the Supreme Court of Pennsylvania was signed by 57 physicians who between them support 3,000 patients who suffer from EHS. They confirm that exposure to EMF/RF can be harmful, at least to some people. 'It can directly injure; it can exacerbate pre-existing conditions; and it can interfere with treatment.' 'Electro-sensitivity is not truly a sensitivity; it is a sickness caused and/or aggravated by exposure to pulsed RF/EMF, with serious physiological complications. Many hundreds of studies have proven that RF/EMF exposure can cause and/or aggravate these symptoms and the underlying injuries and establish the causal mechanisms of harm.' (page 66/67) <https://childrenshealthdefense.org/wp-content/uploads/Brief-and-Addendum-Submitted-9-14.pdf>

Within the Digital Connectivity Strategy for Ireland this EHS group would come under the classification of being 'left behind' and along with other groups who are considered the be 'disadvantaged' the vision is to assist all to become digitally active when in fact, this is a group of citizens who live in daily dread of a further escalation of EMF/RF radiation. The element of choice does not appear to exist within this Strategy.

PRIMARY SCHOOLS/PROVISION OF LAPTOPS AND TABLETS

The Digital Connectivity Strategy is set to 'provide high-speed broadband connectivity to up to 1,100 primary schools ... and support learners through the provision of ... devices, and software; as well as a programme of providing laptops for 20,000 disadvantaged students.'

Over recent years many parents have become concerned about the levels of environmental pollution from emissions of EMF/RF radiation particularly from strong WiFi systems and use of wireless gadgets in their children's schools. Leading experts such as Dr. Anthony Miller, an advisor to the World Health Organisation, has warned that pupils could suffer long-term effects from exposure to EMF/RF, with possible changes to DNA and cancer. Sadly some students such as Jenny Fry found her EHS situation unsustainable and ended her life. The main issue is that children have thinner skulls that absorb more of the EMF/RF radiation emissions. Dr Miller states "We ignore this at our future peril."

<https://www.mirror.co.uk/news/uk-news/school-wifi-networks-could-put-12602188>

Many independent scientists and physicians have produced peer-reviewed research studies identifying harm in the unique environment of schools, where it is usual for numerous devices to be emitting pulsed microwave EMF/RF consecutively.

<https://ehtrust.org/why-are-doctors-concerned-about-the-health-effects-of-wireless-and-cell-phones-in-schools/>

To gain more in-depth knowledge on this issue numerous Letters by Medical Doctors/Public Health Experts to Schools on Wireless health Risks in Schools are contained here:

<https://ehtrust.org/resources-to-share/letters-doctors-wifi-schools/>

In December 2013 the Irish Doctors Environmental Association (now retired) distributed an open letter to the Principals of every school in Ireland. It highlighted their concern over exposure to microwave radiation from wireless technology in the school environment and urged an immediate reduction in exposure to EMF/RF and for schools to replace Wi-Fi with safer wired alternative systems.

<https://iervn.files.wordpress.com/2019/06/idea-wifi-in-schools-2013.pdf>

Besides the threat to the developing physical body and brain of children at school there are other key aspects that don't appear to have been properly addressed as yet such as surveillance and collection of children's data, digital addiction, information overload/burnout, ability to turn information into knowledge (the two dimensional virtual process does not require 'sensorimotor integration'). Without use of our senses, reflection and critical analysis, potential knowledge is reduced to unmemorable snippets of information. If communication is continuously experienced in a virtual way the process of understanding 'facial expression, inflection, ambiguity, irony, warmth, and coldness is lost.' Furthermore, 'Empathy – one of the most important virtues of social skills – cannot be developed' without real face-to-face communication.' (*Peter Hensinger: Big Data: A Paradigm Shift in Education from Personal Autonomy to Conditioning toward Excessive Consumerism.*)

<http://kompetenzinitiative.net/KIT/KIT/category/articles/>

Daily Mail article

<https://www.dailymail.co.uk/news/article-5872001/Could-wifi-giving-children-cancer.html>

Growing Up Healthy in a World of Digital Media

https://www.youtube.com/watch?v=TzW_41WG_tE

Dr. Sarah Starkey, Physicians' Health Initiative for Radiation and Environment (PHIRE), UK National Education Union, Lecture in Stormont Hotel 2018, *Technology and Education, How Safe are our Children?*

[https://cdn.website-](https://cdn.website-editor.net/2479f24c54de4c7598d60987e3d81157/files/uploaded/NEU_WiFi_in_Schools.pdf)

[editor.net/2479f24c54de4c7598d60987e3d81157/files/uploaded/NEU_WiFi_in_Schools.pdf](https://cdn.website-editor.net/2479f24c54de4c7598d60987e3d81157/files/uploaded/NEU_WiFi_in_Schools.pdf)

The following sections of this submission address other important points contained in the Digital Connectivity Strategy. Electromagnetic Sense Ireland (formerly known as Irish Electromagnetic Radiation Victims Network) have already dispatched submissions regarding these to Government Departments, State Bodies, county councillors and others over many years. Given the importance of the issues contained within them, excerpts have been copied here and access to each full submission, including links, is available on our website at es-ireland.com.

MARINE, MARITIME SITES AND SUBMARINE CABLES

The ambition heralded in the Digital Connectivity Strategy for Ireland places us at the forefront of European and Global Digital Developments through Direct Connections to Europe and North America. The infrastructure for this involves the establishment of interconnectors and subsea cables that will be used for the purpose of transmitting electricity needed to generate global digitalisation. In recent years there has been increasing international concern about the potential harm from electromagnetic fields including EMF/RF on all living things in our offshore seas and oceans.

The following is an excerpt from our Submission (May 2021) regarding the Interconnector between

Wexford and the UK, which has since been granted planning permission:

<https://es-ireland.com/2021/06/01/greenlink-interconnector-between-wexford-and-the-uk-submission/>

The question about potential effects of EMF/RF on the living things in our seas and oceans is addressed in "The European Commissions, Science for Environment Policy Leaflet – How do subsea cables affect electromagnetic-sensitive marine species? (5th October, 2020/Issue 549). This refers to a research paper: *Anthropogenic electromagnetic Fields (EMF) influence the behaviour of bottom-dwelling marine species* (2020) and highlights the possible impact of EMF/RF on particular 'marine species that have adapted to use electric and magnetic cues in essential aspects of their life cycle.' Underwater cables, such as the Greenlink Interconnector, which will be installed in our coastal and offshore waters emit electromagnetic fields/RF, which can disrupt cues used by some species to 'detect prey, avoid predators, find mates, orientate and migrate'. This research paper concludes that 'electro- and magneto-sensitive species display observable behavioural difference in the presence of an EMF-emitting HVDC electricity cable' and despite these cables being protected, this does not shield the emitted EMF, 'which is often used to locate buried cables.'

https://ec.europa.eu/environment/integration/research/newsalert/pdf/549na3_en_how-do-subseacables-affect-electromagnetic-sensitive-marine-species.pdf

Our submission also makes mention of The Sustainable Energy Authority of Ireland's (SEAI) report, *IMPACT OF ELECTRIC AND MAGNETIC FIELDS FROM SUBMARINE CABLES ON MARINE ORGANISMS, THE CURRENT STATE OF KNOWLEDGE*

<https://www.seai.ie/technologies/ocean-energy/ocean-test-sites-in-ireland/foreshore-lease/Appendix-4-Impact-of-electric-and-magnetic-fields.pdf>

REDUCING ENERGY, ENABLING DECARBONISATION, CLIMATE CHANGE

The Strategy proclaims that digital technologies have a vital role to play in 'reducing energy ... in enabling decarbonisation ... and in restoring biodiversity and ecosystems.' With no details as to how this is possible, there is at least an acknowledgement that 'the environmental impacts of digital technologies can be negative and substantial.'

The submission of Electromagnetic Sense Ireland to the Climate Conversation – Climate Action Plan in May 2021 considered the following points: <https://es-ireland.com/2021/06/01/climate-conversation-climate-action-plan-may-2021-public-consultation/>

1. Negative effects of EMF/RF emissions on Wildlife. Again, here we quote Bio Scientist Ulrich Warnke. : "Today, [the] natural information and functional system of humans, animals and plants has been superimposed by an unprecedented dense and energetic mesh of artificial magnetic, electrical and electromagnetic fields, generated by numerous mobile radio and wireless communication technologies." "Bees and other insects disappear, birds avoid certain areas and are disoriented in other locations. Humans suffer from functional disorders and diseases. And those that are hereditary are passed on to the next generation as existing defects." (*Bees, Birds and Mankind – Destroying Nature by 'Electrosmog – Ulrich Warnke'* (bio-scientist with a team of highly respected professors and doctors, whose work document only reproducible facts).

<https://ecfsapi.fcc.gov/file/7521097894.pdf>

2. The creation of E-Waste, an issue that needs to take central stage in any discussion regarding health, eco-systems, environment and climate change.

Excerpt from our submission:

The UN-affiliated Global E-waste Monitor 2020 report informs us that 53.6 million metric tons of E-waste was generated globally in 2019, made up of discarded electronic devices.

Erik Ekudden, Senior VP, CTO and Head of Group Function Technology at Ericsson, has stated "Some communications service providers have even estimated a doubling of their energy consumption to meet increasing traffic demands while improving their network and rolling out 5G." ... "This is not sustainable from a cost or environmental perspective."

<https://www.euractiv.com/section/energy/news/ericsson-5g-could-dramatically-increase-network-energy-consumption/>

3. Satellites and the Rockets used to launch them

The establishment of 5G and rollout of 'smart' and digital technology is not confined to terra firma as telecom operators are currently in the process of surrounding the Earth with a network of hundreds of thousands of satellites that will provide wireless Internet access on a global scale. Ireland has agreed to participate in this venture with SpaceX. Overall, the exponential rise of the subsequent ozone-destroying rocket exhaust, some of which use kerosene, will have a devastating effect on ozone and global temperatures. The carbon dioxide, water and soot being emitted, absorbs the sun's heat and remains in the stratosphere for at least five years – the cumulative effect will contribute significantly to global warming. The antennas also need to be disposed of every five years, which will see a continuum of replacement and disposal.

Authors of the geophysical research report *Potential Climate Impact of Black Carbon Emitted by Rockets* (2010) refer to the effects of only 1,000 launches per year stating that it would 'create a persistent layer of black carbon particles' that could cause 'significant changes in global atmospheric circulation and distributions of ozone and temperature.'

<https://agupubs.onlinelibrary.wiley.com/doi/full/10.1029/2010GL044548>

FIFTH GENERATION BROADBAND (5G)

The Strategy announces that 5G is to be 'made available in the cities, towns, and villages where people typically live and work, along transient and commuting routes and in areas that are of strategic importance to the local community' and will foster systems that will facilitate the deployment of 'Smart' City services.

5G installations have already massively increased the microwave radiation emissions in all our towns and cities, and further installations including the future millimetre applications will mean even more harmful continuous radiation exposure. New frequencies, increased frequencies and the various applications and methods used have not been evaluated as to their safety by experts independent from the telecommunications industry. The requirement to have blanket 5G coverage will mean hundreds of thousands of antennas installed on every street, mounted in public areas, on utility poles, street furniture etc. In addition to existing EMF/RF coverage, an exponential increase in radiation from 5G antennas will contribute to potential adverse effects to many humans, wildlife, biodiversity etc.

There is little to say about 5G given that there is not, as yet, one scientific research papers confirming that it is safe. The question here is, given this fact, the establishment of 5G can only be seen as a mass experiment on populations and without their consent. This also raises questions about the Strategy's comments about the trialling of test and pilot networks in Ireland. All of these experiments are against the Nuremberg Code. It seems that those we pay to protect us are willing to allow a potential catastrophe to occur in exchange for short-term profits for industry in our 'winner-takes-all-economy'

INSURANCE

Given all of the above there is one more point that needs to be taken into account in the pursuit of the aspirations in the Strategy and that is the issue of Insurance.

The Insurance Industry introduced 'Exclusion (32)' which is applied across the market as standard. The purpose of this it is to exclude cover for illnesses caused by Electromagnetic Fields including Radiofrequency Radiation.

Specialists from Emerging Risks teams at leading global reinsurance firms are warning the insurance industry that unforeseen consequences of electromagnetic fields could lead to a raft of claims and significant product liability losses in the next 10 years. See this and a collection of reports, white papers and news articles where insurance companies report on the issue of electromagnetic fields:

<https://ehtrust.org/key-issues/reports-white-papers-insurance-industry/>

CONCLUSION

Good disagreement is central to progress. Thank you for the opportunity to have our say and for providing another platform to create awareness about the inaccurate opinion that there are no issues linked to the EMF/RF emitted from digital and 'smart' technologies.

Given the Strategy's self-promotion of Ireland as being at the forefront of the European and Global Digital Developments it would have been courageous of the producers to include those in the population who are already suffering from Electrohypersensitivity (EHS)/microwave sickness as the European Economic and Social Committee (EESC) has had the generosity to do. Their opinion is contained in their report *Digitalisation, Challenges for Europe (2019 to 2050) Chapter 111, Social Impact of Digitalisation*. It is worth quoting in full:

European Economic and Social Committee
Digitalisation, Challenges for Europe
Chapter 111, Social Impact of Digitalisation
March 2019

Electromagnetic hypersensitivity (page 85)

Rapporteur: Bernardo Hernández Bataller

Background

Each day the number of EHS sufferers increases: according to new estimates, between 3% and 5% of the population are electro-sensitive, meaning that some 13 million Europeans may suffer from this syndrome, which has various names (electro-sensitivity, Wi-Fi syndrome, microwave syndrome, electromagnetic hypersensitivity, etc.).

Gist of the opinion¹

Exposure to electromagnetic fields has been increasing in recent years, following the expansion of technologies. In addition to health problems, this can result in limited access to many public or private facilities, especially in buildings where devices have been installed for transmitting wireless technology.

These people may sometimes suffer the incomprehension and scepticism of doctors who do not deal with this syndrome professionally and therefore fail to offer proper diagnosis and treatment. Due to the serious differences in scientific opinion, the independence of bodies involved in establishing maximum exposure levels must be reinforced. The EESC is in favour of adopting binding safeguarding legislation that reduces or mitigates exposure to electromagnetic fields.

The EU should assist currently affected groups and limit exposure fields in light of the recommendations set out in this opinion, especially with respect to recognising this exposure as a cause of functional disability and environmental illness.

The EESC emphasises the need to step up the application of the ALARA principle, bearing in mind the risk of non-thermal biological effects of electromagnetic emissions. In addition, it is important to facilitate research in this area. The EESC is in favour of ensuring a high level of health protection for workers by applying the improvements that are available, while this principle should be included in European legislation.

¹ Opinion of the European Economic and Social Committee on electromagnetic hypersensitivity (own-initiative opinion)

https://www.eesc.europa.eu/sites/default/files/files/qe-01-19-295-en-n.pdf?fbclid=IwAR3ozMC1Oz5FIAKIYI856GbZQHs9upYYC5fLDEF_4yzKd5AbwgRkkphJ2I