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To: Digitalconnectivity [REDACTED]
Subject: A Consultation on the State's Digital Connectivity Strategy [REDACTED]
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I wish to make the following observations and comments on the Government's recently launched Digital Connectivity Strategy.

Consultation Question 1

The ambition level in the Digital Connectivity Strategy is highly inappropriate for the following reasons:

- it aims to considerably increase wireless telecommunications and 'smart' technology across Ireland which would mean massive amounts of harmful exposure to pulsed wireless and electromagnetic radiation. As the government have been aware for many years, this is a well studied and researched issue and has been demonstrated in thousands of independent studies - and reported by millions of adversely affected individuals - to have harmful effects on health, wildlife and the environment
- the aim that 5G is '*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 '*all populations covered by 2030*' will blanket almost all people, including infants, children and vulnerable adults, with constant 5G frequencies on top of existing 2, 3 and 4G and other wireless frequencies. Again, thousands of independent studies demonstrate that wireless radiation is harmful at existing levels and at levels well below ICNIRP's guidelines. Existing wireless microwave radiation has already made a lot of people very sick.
- while we are in the throes of Climate Change and an energy crisis, it is completely counterproductive to install and run networks that will result in huge increases in energy consumption. The extra electricity generated for base stations, masts infrastructures, data centres, manufacturing of hardware and 'smart' devices would result in billions of extra tonnes of carbon dioxide released into the atmosphere
<https://es-ireland.com/environment-wildlife/>

Consultation Question 3

The European Electronic Communications Code sets out revisions to the regulatory framework for the telecommunications sector which would provide exemptions to industry and facilitate the widespread installation of small cell 5G, Wi-Fi or any wireless telecommunications antennae without public consultation, consideration or consent. Industry and economics appear to be main focus of the Strategy and not the fact that there is little need for this in many areas of Ireland, the potential adverse health effects and illnesses already long associated with wireless and electromagnetic radiation, ie cancers, neurological illnesses, infertility, headaches, auditory problems, insomnia, and

intolerance to EMFs. There are a growing number of people in Ireland suffering on a daily basis from intolerance to and suffering distressing and painful symptoms from microwave, wireless and electromagnetic radiation. As these wireless infrastructures and frequencies have increased considerably over the last two years, many more people are experiencing and reporting symptoms. With further increases and blanket radiation, we will have a very sick nation.

Consultation Question 4

While it is the remit of the Department of Environment, Climate and Communications and, more recently the Environmental Protection Agency to deal with the public exposure and health effects of EMFs, neither are competent bodies in the field of health, or indeed electromagnetic radiation. Very few EMF measurements are done by ComReg at the thousands of mast sites across the country, and no agency is monitoring the health of people living near masts and antennae. The DECC and EPA already ignore the people suffering with health issues from this EMF and RF radiation. A separate department agency should be set up to deal solely with this issue, with knowledge of EMFs and their effect on health, and regular monitoring and assessments. The 2016 European Directive "Safety, Health and Welfare at Work (Electromagnetic Fields) Regulations 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, should also be enforced. Separate monitoring should also be done of wildlife, bees, birds, insects and the natural environment around areas where masts, base stations, etc are sited.

Consultation Question 6 (other general observations)

- I question the need for digital connectivity everywhere on the island of Ireland. It is absolutely not necessary to be able to access the internet everywhere we go, certainly not in a park or a forest or while driving on the road. It is also unnecessary to have strong mobile coverage everywhere and from all telecom companies.
- Many areas of Ireland already have a choice of fibre and part fibre internet connection to their premises from different providers, as well as mobile and wireless broadband coverage (and public wifi) for different providers. It is overcrowded in many areas and there is absolutely no need for more wireless and telecommunications infrastructure.
- The views, concerns and health of locals should take priority over the competition between telecom companies, and the need for industry and the government to saturate us with this technology. The granting of planning permission for telecommunications structures and antennae placement should cease especially next to homes, schools, hospitals etc. and especially where there are already existing structures in place;
- Wired cabled internet technology which is safer, faster, more reliable and more

cyber secure than wireless telecommunications should be prioritised and incentivised;

- 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. New safety standards for RF radiation 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, should be established in Ireland
- Safe EMF free and low EMF environments should be made available for people intolerant to and suffering from EHS and microwave/EMF sickness, to live and spend time in.
- information and awareness-raising campaigns on the risks of potentially harmful long-term adverse effects on health should be put in place. The advice and recommendations of the International Agency on Cancer Research, W.H.O and Chief Medical Officer, Tony Holohan in 2011 that there is a "general consensus that children are more vulnerable to radiation from mobile phones than adults" and 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, should be reiterated;
- as with radiation from mobile phones, wifi and all smart devices pose a particular risk to children. Childcare settings and schools should have hardwired internet networks rather than wifi and schools should not allow children to have mobile phones in schools.
- The proposed Mobile Phone Radiation Warning Bill 2011 should finally be enacted <https://www.oireachtas.ie/en/bills/bill/2011/24/>
- **The Copper Switch-Off** The planned switching off of the legacy landlines would major consequences for many people, including:

Those of us who do not have or want a mobile phone, can not use them without experiencing considerable pain, and others who just don't want them. Elderly and others who are uncomfortable with, unable to, or do not want to use a mobile phone. Some do not want, or need, internet connection which would be necessary if copper is switched off and a landline is still required. Current traditional fixed telephone landlines are what most of us are used to and the most reliable telecommunications technology especially in a power cut. In a recent consumer survey carried out by ComReg they found that : *41% of those with a traditional fixed landline with no power cable have a misperception,that their service will not work in a power outage*

<https://www.comreg.ie/media/2021/12/ComReg-21143a.pdf>

This of course means that traditional landlines do and are more likely to work in a

power outage. The internet will go down in a power outage.

VOIP telephony needs decent broadband and not everywhere has decent wired broadband.

Also there would be huge concern for elderly and vulnerable people who use emergency call button systems which need to be linked to traditional landlines. See concerns from some people in the UK in this regard.

<https://www.mailplus.co.uk/edition/comment/letters/167105/is-the-proposed-axing-of-landlines-by-2025-a-betrayal-of-the-most-vulnerable?fbclid=IwAR3kG0CU4Gbys4hUTARGnYJtIlgIh4yN5VdJYknabPtr3aamjLn3sQdDII8>

- The Strategy refers to the networks and digitisation services as 'ecosystems'. This appears to be changing and replacing the true meaning of natural and environmental ecological systems with business terminology, ie describing a completely separate 'economic system'. They are not the same.

Thank you for the opportunity to participate in this consultation.

