

## Consultation on the Digital Connectivity Strategy – [REDACTED]

### **Excluded population group**

The 'Digital Connectivity Strategy for Ireland Draft Paper' is a 'Telecoms Stakeholder Action Plan.' It is being driven to include connectivity for 100% of Ireland's population.

Second down the list of promised outcomes (Background & Context) is "the delivery of social dividends, including ensuring that disadvantaged groups are not left behind in this transition, and can fully embrace digital opportunities."

One such 'disadvantaged group' is those people who are suffering from 'Electromagnetic Hypersensitivity.'\*

This 'Strategy' as it stands will only serve to reinforce the divide and potential conflict between those who can access digital technologies and those harmed by them.

The Minister and his Department of the Environment, Climate and Communications, knows full well that there is a growing percentage of the global population being permanently harmed by the roll-out of these digital, wireless technologies. He knows because he and the Department for which he is responsible have personally received notifications updating him on this issue. Continuing to ignore this fact and inflicting involuntary exposure to wireless technologies will amount to direct discrimination of this population group which may force many into legal action.

In 2019, the number of Europeans being incapacitated (neuro-diverse, with impaired neurological function) as a result of the exponential increase in exposure to electromagnetic radiation was conservatively estimated at c 13 million people.

Between 3% and 5% of countries' populations were considered to be impacted. In Ireland, this equated to between 150,000 and 250,000 people.

In the European Economic & Social Committee's publication, 'Digitalisation – Challenges for Europe' an entire page was devoted to 'Electromagnetic hypersensitivity.'

The Rapporteur was crystal clear in stating:

*"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..."*

*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 Minister and his Department have steadfastly offered no comment on this EU request.

The Strategy's target for Digital Connectivity is "All Irish households and businesses will be covered by a Gigabit network no later than 2028."

Measures to be employed include "continuing to roll-out Eduroam Wi-fi hotspots across Ireland ... libraries, town centres, healthcare, and other community settings" ; these will only serve to increase the suffering of EHS people denying them access to supermarkets, medical services, churches, urban housing, community gatherings because they will not be able to tolerate the stronger signals and. increased radiation.

So, can those suffering from Electromagnetic hypersensitivity'\* opt out of having blanket 5G coverage (as well as existing 2G, 3G & 4G coverage) imposed on them?

Where is their right to live in a safe space free from polluting carcinogens?

What has happened to the right of 'informed consent?'

The Council of Europe, (of which Ireland is a founding member) recommended that 'white zones' be created for electrohypersensitive people so they would have a place to live that did not impair their health and ability to function. {Resolution 1815 (2011)}

Ireland has done nothing to try to bring this about.

A Danish 'Legal Opinion' concluded in 2019

*"that establishing & activating a 5G network... would be in contravention of current human and environmental laws enshrined in the EU Convention on Human Rights, the UN Convention on the Rights of the Child, EU regulations, and the Bern-and Bonn conventions. The reason is the very significant body of scientific documentation available, showing that radiofrequent electromagnetic radiation is harmful and dangerous to the health of humans (particularly children), animals and plants."*

The 'Digital Connectivity Strategy for Ireland Draft Paper 2022' while vaguely alluding to some "environmental impacts of digital technologies" assiduously avoids requiring telecom stakeholders to ensure their products are safe to human and planetary health.

Neither is there any mention of liability, an important consideration in a nationwide roll-out of a new untested technology.

Insurance companies now classify radiofrequency/microwave radiation as a 'pollutant' excluded generally from policy cover or, in some instances requiring extra premiums for special additional cover.

So where will the burden for financial recompense land when the rising numbers of incapacitated, 'dis-abled' citizens increases further, as we are assured it will<sup>2</sup> by the EESC through the expansion of 5G?

What systems are in place to support the people of Ireland when they can no longer work, live with their families or interact in any meaningful way in society because they are too sick? Where can they go to 'detoxify' if the Government's aim is to blanket radiation across the whole country 24/7?

Does the Irish Government own the spectrum / airwaves?

Does the Irish Government own the air we breathe within our homes?

These are not flippant questions. One of the 'proven' adverse health effects caused by exposure to man-made non-ionising radiation is a reduction in oxygen uptake.

Medical imaging has shown that those neurologically incapacitated by continuous exposure to radiofrequency/microwave radiation have a serious depletion in blood oxygen supply to the brain's limbic system.

One of the triggers for EHS can be metal implants (orthopaedic and dental) because metal acts as a conductor, aerial and amplifier.

*"In biological dentistry, every metal in the body is regarded as a kind of antenna for microwaves and other electromagnetic fields (EMF)..."*

*... "The standard absorption of emfs can be increased 400-700 times simply by using a mobile phone (ringing or SMS reception) in combination with metals in the mouth."*

Ireland has chosen to adopt the I.C.N.I.R.P. Guidelines for safe non-ionising radiation exposure levels radiation but I.C.N.I.R.P. has repeatedly stated that these Guidelines exclude people with metal implants. Even their most

recent publication (2020) while noting metallic implants may alter or perturb EMFs in the body” excludes people with metal implants from the “scope” of the document.

People with metal implants may experience more heating effects and therefore biological harm. The metal ions which break off through daily activity and wearing may be sequestered in different parts of the body and also are able to cross the blood-brain-barrier leading to increased risk of neurological disease. This ‘movement’ can be accelerated by conductivity on exposure to electromagnetic fields and rf/microwaves.

But there are wider implications for the whole population and environment regarding metals and increased conductivity from denser digital networks and proliferation of rf/microwave devices singly and accumulatively.

Rf/microwaves interfere with metals in spectacle metal parts, metal dyes in tattoos, continuously worn jewellery, metal sprung mattresses, metal keys in pockets, metal cars/train carriages etc.

What thought has the Department given to the interaction of 5G with local geology ie increased metal deposits in some areas which may increase conductivity /health risks for those living there?

What thought has been given to this issue by the Department who according to their website is also responsible “for setting policy relating to the health effects of Non-Ionising Radiation (NIR) including electromagnetic fields”?

Does the Department have an innate conflict-of-interest it cannot resolve between human health and the environment on one hand vs business interests of the telecoms on the other?

The Department of the Environment, Climate and Communications **must** adopt more stringent Guidelines to ensure protection of human health and the natural environment.

Action – the Department must include in their Strategy measures to

- i protect the Electromagnetic Hypersensitive population by designating ‘white zones’ free of wireless technologies and liaising with the Ministers responsible for Health and Housing.
- ii retain the copper line network for EHS who are unable to use mobile phones so they are able to have some communication tool.
- iii ensure regional / local assessments take into account soil / rock metals as possible causes of increased conductivity / adverse health symptoms & illness.
- iv adopt Guidelines for exposure to non-ionising radiation that are more protective of human and environmental health, especially with regard to metal implants

## **Research**

No research has been carried out into the interaction between wireless technologies and the Schumann Resonance to which all living things on Earth and the planet itself are attuned.

Until this has been done the Precautionary Principle should be employed as per European guidelines on any new area of innovation for which there exists no conclusive proof of absence of harm. This roll-out of 5G should be paused.

No research has been done looking at the interactions between the electrical grid and wireless technologies as a ‘Complex System’. Work has been carried out on the electrical grid as a separate complex system but not on any dynamic characteristics which may cause the relationship to create separate adverse effects. [An example of a

Complex system includes a flock of birds; each has its own dynamic but when the individual components make up a flock, the flock takes on a separate entity].

Dirty electricity – further roll-out of 5G and other digital technologies will increase rf spikes ‘noise’ on house electrical wiring which can adversely affect human health.

Powerline harmonics - Continuing the digital roll-out will require additional massive electricity infrastructure.

Few seem to be aware of the effect of powerline harmonics in space and how these are continuously leaking into the magnetosphere and have altered the Van Allen radiation belts. The electron-filled radiation belts around the earth are separated by a layer that “some think is continually drained of its electrons by their interaction with radiation from power lines.” [“The Invisible Rainbow – A History of Electricity and life”, Arthur Firsenberg]

### **Regulatory Checks & Balances** the role of Comreg

Comreg is held to be responsible for “regulating the sector”. [4.5]

However, a recent FOI request [1153] revealed that the organization does not have a figure for the total number of mobile phone masts, does not monitor or collect data on wifi masts, and does not collect information on which frequencies are being beamed from shared masts by different companies:

“ ComReg does not collect this type of information: • how many shared (different companies) mobile phone masts there are; • how many masts are operated by one company only using one frequency only; • if there are any restrictions on sharing of masts regarding multiple frequencies being operated simultaneously; and • how many cells are erected for private use by the public on a) homes; b) businesses.”

Comreg is at the mercy of information being passed to it by the mobile phone mast operators. This seems completely inadequate. No research has been done showing the health effects of multiple frequencies being simultaneously beamed from the same masts. It is imperative this kind of information is thoughtfully and efficiently sought, monitored and assessed.

Action: It should be part of the Department’s regulatory framework that it is compulsory for mobile phone operators to file up-to-date information to Comreg.

The number of inspections by the company sub-contracted by Comreg to check on compliance with ICNIRP Guidelines is increased from 80 per year and a summary list of sites should be available to the public to view together with details of weather conditions (which can increase or decrease power levels from transmitters to maintain signal continuity).

A database of ALL wireless masts should be maintained by Comreg.

### **Back up Plan**

What is the Department’s back-up plan if the roll-out of 5G needs to be reversed because the effect on human health and the environment is simply too high a price to pay?

## Sources

The Rapporteur for that Working Document – Mr Bernardo Hernandez Bataller – published a section on ‘Electromagnetic Hypersensitivity’ in ‘*Digitalisation – Challenges for Europe*’ published by the European Economic & Social Committee. . (p85) (2019)

<https://www.eesc.europa.eu/sites/default/files/files/qe-01-19-295-en-n.pdf>

‘How titanium implants act as antennas for electromagnetic fields.’ [www.dnaesthetics.de/2019/10/biological-dentistry-electromagnetic-field-ceramic-implants/?lang=en](http://www.dnaesthetics.de/2019/10/biological-dentistry-electromagnetic-field-ceramic-implants/?lang=en)

<https://www.fda.gov/radiation-emitting-products/cell-phones/magnets-cell-phones-and-smart-watches-may-affect-pacemakers-and-other-implanted-medical-devices>

*“Compliance with the present guidelines may not necessarily preclude interference with or effects on medical devices such as metallic prostheses...Advice on avoiding these problems is beyond the scope of the present document.”*

ICNIRP Guidelines for limiting exposure to time-varying electric, magnetic and electromagnetic fields (up to 300 GHz), published in: *Health Physics* 74 (4):494-522;1998

In 2010 ICNIRP reiterated this statement. ICNIRP Guidelines for limiting exposure to time-varying electric and magnetic fields (1Hz to 100kHz) *Health Physics*, DOI: 10.1097/HP.0b013e181f06c86 2010

‘Purpose and Scope’ from ICNIRP GUIDELINES FOR LIMITING EXPOSURE TO ELECTROMAGNETIC FIELDS (100 KHZ TO 300 GHZ), *HEALTH PHYS* 118(5): 483–524; 2020

