

Gareth O'Brien  
North Runway Technical Group

[REDACTED]  
[REDACTED]  
gobrien@yupon.com

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Minister Patrick O'Donovan, T.D.  
Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media  
23 Kildare Street  
Dublin 2

cc: Gillian Toole TD, Darren O'Rourke TD, Minister Helen McEntee, Minister Thomas Byrne  
Louise O'Reilly TD, Robert O'Donoghue TD, Grace Boland TD

**Re: Will Ireland's Disinformation Strategy Include the State — or Be Used to Silence Criticism?**

Dear Minister O'Donovan,

I write to you in relation to the recently published National Counter Disinformation Strategy, which you rightly described as a necessary response to the growing threat false information poses to democratic life and public trust. I commend the ambition behind the strategy and agree that disinformation — whether foreign or domestic — represents a danger that cannot be ignored.

However, I wish to raise a fundamental concern that the strategy appears not to address: what happens when disinformation originates from within the State itself?

I refer in particular to the sustained and increasingly documented campaign of public disinformation and narrative manipulation conducted by the Dublin Airport Authority (daa) — a state-owned company, overseen by the Department of Transport and accountable to Government.

Over the past two years, in addition to a sustained media campaign, daa has responded to over 170,000 citizen noise complaints using template language that:

- Misrepresents the legal status of current flight paths;
- Cites a "Noise Preferential Route" that deviates materially from the route approved in the 2007 Environmental Impact Statement;
- Attributes non-compliance to vague "safety reasons" without substantiation;
- And, perhaps most concerningly, brands factual, evidence-based objections by citizens as "falsehoods."

This is not just poor communication. It fits the very definition of institutional disinformation — the strategic use of misleading public statements to deflect accountability and undermine legitimate criticism.

Moreover, daa is exempt from Freedom of Information legislation, meaning the public has no right to inspect internal correspondence, decision-making processes, or the basis for these statements. This opacity is in direct contradiction to the core values outlined in your strategy: transparency, trust-building, and institutional accountability.

I respectfully ask:

*Will your anti-disinformation strategy include mechanisms for holding state agencies and state-owned companies accountable for misleading the public? Or is this strategy intended solely for controlling narratives outside of Government — and silencing those who challenge the official line?*

If the State's disinformation strategy is to be credible, it must apply equally to every organ of the State, not just to citizens or external actors. If it fails to do so, it risks becoming not a shield for truth — but a sword for silencing criticism.

I would welcome your response to this concern and your reassurance that truth will not be selectively defended in Irish public life.

Regards,

Gareth O'Brien BE (Civil) MSc  
North Runway Technical Group