Changes to Industry Canada's Antenna Tower Siting Policy, CPC-2-0-03.  
March 19, 2014

Industry Canada'a announced consultation process to provide the Canadian public with new cell tower and antenna siting protocols does go some way to improve the current standard. With safety and public health in mind, the protocols would want to include the more inclusive language highlighted by the group C4ST.

To wit:

"We request the inclusion of non-tower structures (building-mount, rooftop, hydro-pole, utility pole, etc...) installations be included in the notification and consultation process.
Rationale for Request: While the update on Feb 5th now requires all new cellular towers regardless of height to fall into the consultation process, we are concerned that telecommunication proponents will choose to install more and more building-mount, rooftop and hydro/utility pole antenna installations closer to homes and schools, as an alternative to working through the consultation process.

We request that changes and or modifications to existing towers/antennas in place that would raise the RF output of the structure by more than 25%, be included in the notification and consultation process.
Rationale for Request: The proposed update from Industry Canada to section 5.4 (Exclusions) below states that existing towers are exempt from the consultation process as long as their height does not increase by more than 25%. While height may be a consideration, the public health concern is the output of the tower/structures. Without inclusion of consultation for an increase in output, Canadians will have no idea of the increased emissions in close proximity to their homes and neighbourhoods. The rationale for consultation of new towers should apply to existing as well.

We request that the distance around a tower that requires notification as per section 5.2 (Public Consultation Process) be increased from 3 times the tower height, to 10 times.
Rationale for Request: Some of the highest exposures and health effects can be experienced up to 500m from the tower, depending on the angle of the antennas. Requiring notification only 3 times the tower height would exclude telecommunication proponents from having to individually notify residents that could be most affected by the installation or modification to existing structures."

Without such inclusive language, I see too many obvious gaps in protocols that are meant to increase safety and ensure public health. Otherwise, in many ways industry will be able to carry on as before without effective restraint. Please extend the protocols to include the additional constraining language.

Yours truly,
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