March 31, 2014

Director, Spectrum Management Operations
Industry Canada
235 Queen Street
Ottawa, Ontario K1A 0H5

Via email: spectrum.operations@ic.gc.ca

To Whom It May Concern:

I am writing today on behalf of Canadians for Safe Technology (C4ST), to express our views as part of the current consultation process regarding "the amendments to Industry Canada’s Antenna Tower Siting Procedures", Canada Gazette, Part I, reference number DGSO-001-14.

Municipalities across Canada are becoming aware of the health risks related to wireless radiation and understand that they must take action to better protect their citizens. Most recently, on March 10, 2014, the City of Laval, Quebec took an important step forward when council adopted a resolution aimed at strengthening safety measures related to smart meters.

Other cities have also shown leadership in this area; the City of Laval, Quebec joins the Ontario municipalities of Toronto, Mississauga, Thorold, Guelph and Oakville, and the B.C. municipality of West Vancouver, by taking a stronger stand to protect citizens against wireless sources of radiation.

The World Health Organization (WHO) has indicated that direct, long-term contact with wireless radiation is biologically harmful and can potentially have damaging health effects. In August 2011, shortly after the WHO classified radiofrequency radiation (the basis for all wireless devices) as possibly carcinogenic, Health Canada posted a warning that “encourages parents to reduce children's radiofrequency radiation (RF) exposure from cell phones since children are typically more sensitive to a variety of environmental agents”.

Given that it is Health Canada’s Safety Code 6 which governs the safety of cell phones, cell towers, Wi-Fi, smart meters and all other devices that now permeate every Canadian home, it is our view that Industry Canada must work together with Health Canada to make decisions related to wireless radiation. Wireless radiation from antenna/towers is a serious health concern, the placement of those towers must be very carefully considered.
We urge you to consider the following:

1. **We request the inclusion of non-tower structures (building-mount, roof-top, hydro-pole, utility pole, etc.) installations be included in the notification and consultation process.** While the update in February 2014 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.

2. **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.** The proposed update from Industry Canada to section 5.4 (Exclusions) 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 neighborhoods. The rationale for consultation of new towers should apply to existing as well.

3. **We request that the distance around a tower that requires notification as per section 5.2 (Public Consultation Process) be increased from three times the tower height, to 10 times.** 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.

4. **Our prime concern is public health.** A proliferation of building-mount, rooftop and hydro-pole installations could well result in many antennae being placed in closer proximity to occupied buildings. What is known without a doubt is that with regard to wireless radiation exposure from a fixed source, distance can be your friend. Should more antennae in closer proximity be the unintended consequence of the new regulation, the resulting heavy toll to public health could well outweigh the benefits.

Thank you for taking the time to consider C4ST’s serious concerns. We hope it will help to inform this and future decisions you may make regarding the serious health concerns related to wireless radiation and the placement of antennae towers.

Sincerely, 

*VIA EMAIL*

Frank Clegg, CEO

C4ST