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Thank you for inviting us, for the first time ever, to voice our concerns about the protocol for cell tower and antenna placement. We are grateful for the opportunity to do so.

When the cell towers in Southcott Pines, Grand Bend and Port Franks were constructed, our concerns were not considered. By writing to Industry Canada now, we can ensure that other communities will have the right to be heard!

**Telecom towers and antennas infringe upon our basic human right to live in a safe environment.**
Rationale: The World Health Organization classified the radio-frequency electromagnetic radiation (RF EMR) as a Class 2B possible carcinogen in 2011. We have every reason to believe that this will soon be upgraded based on recent medical findings that link certain cancers to RF EMRs.

**RF EMR is classified as an Environmental Pollutant.**
Rationale: Pollution is the introduction of contaminants into the natural environment that cause adverse change. It is imperative that Industry and Health Canada take all steps necessary to protect the natural eco-structure of this area and its species at risk, including protecting them from harmful emissions of cell tower antennas.

**The Lakeshore Coalition would like to strongly encourage you to take the following actions:**

**We request the inclusion of non-tower structures (building-mount, roof-top, hydro-pole, utility pole, etc...) installations 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 neighborhoods. 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.

Our prime concern is public health. We recognize that it is the mandate of Health Canada to protect vulnerable populations from environmental pollution. Nonetheless, the actions of Industry Canada in this regard could have great impact. 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 we recognize in this update to CPC-2-0-03.

Industry Canada protocols for Cell Tower Antenna and Mast Siting actually breaches several Human Rights, not the least of which is my Right to Life, Liberty and Safety. Radio-frequency Electromagnetic Radiation (RF EMR) from cell tower antenna is a Class 2B possible carcinogen (WHO 2011) which poses a direct threat to health.

We respectfully request that Industry Canada place a moratorium on all cell tower mast and antenna placements until SC6 is re-written with recognition of the non-thermal effects of RF EMRs.

It is critical that all levels of government:

1. Acknowledge that current assumptions about the safety of electromagnetic radiation (EMR) are outdated and must be revised.
2. Offer protection and choice for electrosensitive individuals and children who are exposed to EMR through wifi in schools and smart meters in homes.


1. Implement the recommendations of the House of Commons, Standing Committee on Health 2010 Report.
2. Provide full disclosure for all information regarding all studies and documents reviewed, included and excluded; funding of all participants.
3. Update all analysis/guidelines to keep up with the rapid acceleration of technology.
Industry Canada must update CPC-2-0-03 Radiocommunication and Broadcasting Antenna Systems.

1. Eliminate exceptions guidelines and notify residents of all new cell towers or antennae planned in their community
2. Consultation must include all issues of concern to the public
3. Some authority needs to be rest with local land use authorities. Cell Tower and Antenna protocols must allow for Municipalities to Opt-Out of any siting within their lands, if so desired.

Please take time to watch this informative video presentation made by Dr. Anthony Miller in response to the Toronto Municipal Council.


For more information please visit:

www.C4ST.org
www.wendywalksfores.com
https://www.facebook.com/WendyWalksforES

Thank you for continuing to support a healthy living environment in Lambton Shores!

Lakeshore Coalition