Comments on Changes to Industry Canada's Antenna Tower Siting Policy CPC-2-0-03

Municipalities and the neighborhoods within are directly impacted by cell tower placement, and yet they currently have no meaningful voice in the matter.

I applaud Industry Minister James Moore for the initiative to modernize siting policy. However I have concerns that without further amendments this might all end up as a lost opportunity. In some instances, these changes may actually move us backward.

If you are truly looking to make this process more open and accountable, the notification and consultation process must also include non-tower structures (building-mount, roof-top, hydro-pole, utility pole, etc...)

To grant exemptions like these in a matter concerning public health (the World Health Organization has classified Radio Frequencies as possibly carcinogen) is absurd. The people who live on the top floor of apartment complexes don't deserve notification they will be sleeping beneath a cell tower? They don't deserve a say in the matter because the radiation being emitted isn't bolted to a free-standing tower? What kind of exemption is that? This very clearly creates a loop-hole through which the telecommunications industry will skirt the consultation process entirely.

Please include non-tower structures in the notification and consultation process. Clearly this is where the industry is headed—a greater number of towers but placed on buildings, roofs, poles and other pre-existing structures. Free-standing towers are to become dinosaurs as far as municipalities are concerned. You’re placing greater restrictions on something the industry is already moving away from, and exempting what they’re moving toward.

As it stands, this exemption is a gift to industry and a slap to the face of constituents. This doesn’t provide municipality’s greater transparency—it offers them less. Yes it is that apparent.

In that vein, existing towers cannot be "let off the hook". A brand new cell tower was erected 500m from my home. There are another two towers within 900m. I chose the location of my home based on a number of factors—truthfully two of which were the distance to high-tension power lines, and the distance to existing cell towers (RF and ELF became a research hobby-horse of mine several years back when I sought to get to the bottom of the debate over living near power lines - Nullius in verba). You simply cannot let these existing towers change their output without consultation! If they are changing the overall output of those towers I want to know about it. And I want a say in whether or not that happens. Anything less is simply not transparency.

If the power density of a tower changes, then people need to be made aware. As it stands, I can’t find a single instance of industry being fined or reprimanded for exceeding the power densities they agreed to. Residents have to take them at their word. We have to trust that what has been agreed upon is being monitored and isn’t changing. Is it?

Allowing changes to existing towers without notification and consultation benefits only one side of this equation. How can residents trust these structures if they can change what they’re outputting at any time? With no notice?
What do I receive as a constituent in exchange for granting corporations the power to do whatever they want in my community, so long as they do it on a tower that has already been built? Or conversely, if they build on anything but a tower? As it stands, the holes available in this legislation are large enough to drive a 10Hz wave through, unmolested.

And restricting notice to only 3 times the tower height seems out of date. A figure more in the vicinity of 10-20 times seems more appropriate. It only makes sense to update this wording to more accurately reflect the realities of exposure.

There is a growing scientific consensus that non-ionizing radiation can be harmful—even carcinogenic. The depth and scope of this research far exceeds the format afforded for this call for comments, but I encourage you to research the available peer-reviewed, independently funded studies that make this such an important issue.

Health Canada claims to follow the Precautionary Principle. I would like to think that updating our siting procedures to include municipal concerns is a nod in that direction; it is difficult to practice prudent avoidance when you are intentionally kept ignorant and disenfranchised.

Thank you for taking the time to reflect on my thoughts on this matter. I don’t feel it’s too much to ask that citizens be informed about matters that directly affect their health—perhaps to a degree we don’t yet fully appreciate. The fact that aesthetics are currently the only issue municipalities can raise in regards to cell tower placement showcases the imbalance of power between industry and community.

This is a golden opportunity to shift back the balance of power. Don’t waste it.

Thank you.

Sincerely,

Jason Lillebuen