March 29, 2014

The Honourable James Moore  
Minister of Industry  
235 Queen Street  
Ottawa, ON  
K1A 0H5

Dear Minister Moore,

I am writing with regard to the new regulations proposed to CPC-2-0-03.

I support Industry Minister James Moore in the proposed changes to the IC tower siting policy as a step in the right direction. I do however have concerns.

As a concerned Canadian citizen, I request the inclusion of non-tower structures (building-mount, rooftop, hydro-pole, utility pole, etc...) installations be included in the notification and consultation process.

While the update on Feb 5th now requires all new cellular towers regardless of height to fall into the consultation process, I am 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.

I 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) 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.

I 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. Some of the highest exposures and health effects can be experienced up to 500m from the tower, depending on the angle of the antennas. Some studies have even shown effects up to 1000m. 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.
As a researcher in the field of health, with a Master’s degree in Public Health, and a Ph.D in Applied Social Sciences, I recognize that it is the mandate of Health Canada to protect vulnerable populations from environmental pollution. Worldwide, independent scientists have conclusively shown that there is no guarantee that children can be exposed to any amount of wireless radiation for any amount of time without a biological impact. Leukemia in children has been shown to be linked to wireless radiation. Safety is not guaranteed and Canada’s Safety Code 6 is an antiquated regulation that lags behind even Russia and China and that is based on thermal effects only. The European Parliament and the Conseil de l’Europe, as well as the Bioinitiative 2012 report, have recommended that level of exposure does not exceed 100 to 1000 μV/m2 (compared to the 6 000 000 μV/m2 recommended in Canada’s safety Code y. Local community LUA’s are indicating their health concerns and lack of confidence in Safety Code 6.

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 I recognize in this update to CPC-2-0-03.

Best regards,

Hélène Vadeboncoeur, Ph.D