**Items 27.1 Telecommunications - Authority to Permit the Installation of Stand-Alone Antenna Poles**

**York Mills Valley Rate Payers Association [YMVA], recommend that council vote against the proposal to allow <15m cell towers on public-rights-of-way.**

We support continuation of the existing policy of:

* specifically **allowing** cell companies to install above ground structures on non public-rights-of-way; and
* specifically **preventing** cell companies from installing stand-alone, above-ground structures on public-rights-of-way.

**Structures are ugly and inappropriate for our residential neighbourhoods**

The <15 meters towers proposed for public-rights-of-way are standalone structures with separate equipment boxes [see attachment 2]. These towers will primarily be deployed in neighbourhoods with underground hydro service and will be an eyesore.

**Rogers Contract is not dependent on approval of these structures**

Approval item 27.1 is not required for Renewal of Rogers Contract outlined in item 26.8.

**Community concern about the health effects from wireless radiation is growing**

Federal safety code [SC6] is out of date. Toronto adopted Prudent Avoidance policy for cell towers in 2002 which is some 100 times lower than SC6. Concerns about the health effects from this radiation has been growing since WHO IARC recommended 2A carcinogen rating for this radiation in 2011. At PWIC, Dr. Anthony Miller, one of Canada’s foremost cancer epidemiologists suggested that if IARC were to review wireless radiation today a 2A rating would be applied [1 is the most carcinogenic rating provided by IARC].

In addition to cancer, high quality scientific studies are showing a relationship between wireless radiation and male fertility, behavioural problems in children, cardiac symptoms and ADD/ADHD/autism in pre-natal exposed children – among many other health issues.

**Financial implications are unknown**

Only a small number of these cell towers are likely to be deployed. Rogers estimates 25 such structures in Toronto [likely 200 across all cell companies]. In other countries, the revenue from these cell towers barely covers the costs of planning/notification/approval over a 3 year horizon.

Given the lack of public support for these cell towers, City resources could be deployed more effectively elsewhere.

**Items 29.8 Review of City Protocol for Telecommunications Towers Under 15 Metres in Height**

We thank City Planning for preparing this protocol ahead of the large-scale roll-out of <15m cell towers across GTA

**Notification to Councillors/City on <15m cell towers**

The City hopes that the cell companies will **voluntarily** follow the notification process outlined in this document. However, Industry Canada will support City of Toronto because <15m cell towers are exempted under federal regulation from notification or consultation.

**Suggest that City ask Industry Canada to change its notification protocol for towers <15m**

We therefore suggest that Council write to Industry Canada, Minister More, and ask that towers/antenna less than 15m in height no longer be exempted from CPC-2-0-03 [“Radio-communication and Broadcasting Antenna Systems”] .

**<15m Antenna mounted on Hydro poles**

**Antenna mounted on hydro poles will be the predominant <15m towers in Toronto**

We believe that cell towers on hydro poles are likely to predominate throughout Toronto. The revenue to Hydro is determined by Ontario Energy Board to cover only direct costs to Hydro and this has been determined to be $22.35/year per antenna. This is a deeply discounted rate compared to the commercial rates that apply to cell antennas across Toronto that private land owners usually receive.

Since Hydro is a private company, it is not required to meet Toronto’s Prudent Avoidance standard for radiation emissions. Nor is it required to follow Toronto’s Cell Tower Antenna Placement Protocol [item 29.8].

It is in the public’s best interests, for antenna located on hydro poles meet Toronto best practice.

**Suggest that City ask Hydro Board that any antenna mounted on hydro poles or light fixtures meet the following requirements:**

1. **Antenna meet Toronto’s Prudent Avoidance Health Standard for radiation emitted** [some 100 times less than Federal Safety Code 6 standard]
2. **Antenna are physically tested annually to make sure they meet Prudent Avoidance.**
3. **Antenna follow the full protocol outlined in 29.8 and councillors/residents are notified ahead of installation.**
4. **Toronto Hydro is fully indemnified against all harms from the antenna [including harm to health].**

Note: Cell companies are “self” insured because they are unable to buy third-party insurance for health harm caused by wireless radiation. It is important that City is explicitly not responsible for health harms as this is an important possible risk factor.

**Suggest that Council support Councillor Vaughan’s Motion**

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| That a sign be posted on any telecommunications tower under 15 metres in height that would inform the public that the [appropriate government body] has granted permission for the tower and that concerns should be directed to the appropriate government representative [MP, MPP, Councillor]. |

**Summary of recommendations**

1. **Vote against proposal 27.1 for deployment of <15m cell towers on public-rights -of-way.**
2. **Council ask Toronto Hydro to follow City “best practice” for antenna on its hydro poles.**
3. **Council ask Industry Canada to update CPC-2-0-03 to include notification and consultation on <15m cell towers.**
4. **Council ask Health Canada to update its Safety Codes following international best practice standards [see attachment 1].**
5. **Support Councillor Vaughan’s Motion for signage on antenna/towers .**

ATTACHMENT 1

**Health Canada’s Safety Code 6 is out of date**

Since 2002, Toronto Public Health has required that cell towers on municipal land meet the Prudent Avoidance standard. All other cell companies are asked to “voluntarily” meet prudent avoidance though City has no jurisdiction to enforce this.

Health Canada’s safety code for radiation emitted from cell towers is out of date. Safety Code 6 was originally designed for federal buildings and personnel. It was not “purposed” for public policy yet it has become the default standard across Canada for public policy.

It is currently undergoing a review which will culminate in April 2014. This process underway does not meet international standards for public policy. In the meantime, Toronto residents are experiencing rapidly increasing exposure levels.

**Suggest that Council write to Health Canada to improve safety review process**

We therefore suggest that Council write to Health Canada, Minister Ambrose, and ask that the process by which Safety Code 6 is updated meet international best practice standards;

Improvements are needed in the following areas:

1. Transparency, Public Input, publication;
2. Rigorous systematic reviews; and
3. Inclusion of biological effects [rather than thermal effects only];
4. Permitted exposure levels comparable to global best practice [ie Switzerland].

Good examples of international best practice include:

* Centre for Practice. changing research in Ottawa is a world leader in systematic review methodology.
* US National Toxicology Program has formalized an international best practice approach to “weight of evidence” approach to science [used extensively by Health Canada].

Since the majority of the cell towers currently in Toronto meet Safety Code 6 [rather than prudent avoidance], this input to Health Canada is important.