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Industry Canada  
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Title: Comments on Industry Canada's Antenna Tower Siting Procedure  
*Canada Gazette*, Part I  
Notice reference number: DGSO-001-14  
Date: March 23, 2014

Dear Director of Spectrum Management Operations,

First, I would like to thank you for the positive steps Industry Canada has recently taken with regards to antenna tower siting procedures. Citizens across the country have been informing Industry Canada about concerns regarding exposures to electromagnetic radiation (EMR) emitted by cell towers and these actions tell us that you are listening. We are happy that towers under 15 meters are no longer excluded and that the government of Canada is requiring that residents be informed of any proposals to construct towers via "clearly marked" mail and notices in local newspapers. We appreciate this opportunity to share further concerns through this public consultation process.

There are a few improvements we ask you to make to the antenna tower siting procedures:

- 1) **The distance around the tower that requires notification should be increased.** A great deal of research, conducted by leading scientists from around the world, indicates that health effects can occur within 500 metres of a cell tower. If you do not amend the distance that requires notification, you will not be informing all residents who will be affected. We suggest increasing this distance for notification from 3 times the tower height to *15 times* the tower height.
- 2) **The community should be notified and consulted on any plans for installations on non-tower structures (building-mount, roof-top, hydro-pole, utility pole, etc...).** Our family resides in a rural area with rolling terrain. One of the reasons we moved out of Toronto last year was to live in a healthier environment where the electromagnetic radiation levels are low. Residents in our community have noticed recently that there is a home on a hill close to us that has a cell antenna on the roof. Given that our health is affected by this kind of installation just as much as it would be affected by an installation on a single pole, we would expect Industry Canada to understand that it is extremely important for us to be consulted just the same. Canadians do not want telecommunications companies increasing the number of antennas directly on homes and buildings (creating very high exposure levels for all inhabitants) just to avoid the obligation to go through a public consultation process. Other countries are ensuring

that residents can have a say when it comes to non-tower structures. For example, in places like Germany, the Federal Court of Justice ruled that cell phone antennas on rooftops can only happen with the consent of all shared property owners. Apartment owners of a condominium association must not enforce the installation of cell phone antennas on their rooftop against the will of individual apartment owners.

**3) The community should be informed when there are modifications to existing towers.**

With modifications/ additions to existing towers, you will see increased EMR output. The more powerful the output, the more health effects. We ask to be notified if EMR output increases by more than 15 %.

Studies in South America, North America and Europe show that living within 500 meters of a cell tower is correlated with increased cancer rates. The World Health Organization (WHO) classified electromagnetic radiation as a class “2B, possible carcinogen” in 2011 and experts who worked with WHO at that time state that they believe that it would be elevated to a “2A probable carcinogen” if it was assessed today. There are daily media stories and more and more Canadians are becoming aware that electromagnetic radiation could become the new “tobacco.” By allowing cellular antennas to be installed near to where we live, telecommunications companies are violating our human right to live in a healthy environment. We need Industry Canada to consider our human rights when developing siting procedures.

Industry Canada's stated mandate is, “To help make Canadian industry more productive and competitive in the global economy, thus improving the economic and social well-being of Canadians.” According to IT experts and some scientists, there are new technologies in various stages of development that will allow us to significantly reduce radiation exposure. One way for Industry Canada to increase global competitiveness is to provide incentive for Canadian companies to continue to innovate and bring improved products to market. Concerns regarding EMR exposure are not just on the radar of medical professionals, scientists, and health associations, they are on the radar of the public. It is only a matter of time before new innovation is a necessity for industry worldwide. The Canadian government can play a role now to ensure that Canadian companies are on the leading edge of new and improved technologies that will not impact our health.

We appreciate the time you are taking to consider these comments and suggestions.

Sincerely,

Kristin Morrison  
Caledon, ON  
Canada