



Date: September 16, 2026

Subject: Reply Comments to Submissions received on Consultation on Amendments to the Tower Siting Process and Decision on Roaming, Tower Sharing, and Annual Reporting Requirements for Terrestrial Licences. DGSO 001-26

Email Sent To: spectrumoperations-operationsdsuspectre@ised-isde.gc.ca

Attention: Spectrum Management Operations,

CE4ST works directly with students, families, and school staff who report health effects associated with exposure to radiofrequency electromagnetic radiation (RF-EMR) in school and community environments. We also work with physicians, scientists, researchers, and EMF experts, including experts who have testified before the [House of Commons Standing Committee on Health \(HESA\)](#).

<https://www.ourcommons.ca/Content/Committee/412/HESA/Reports/RP8041315/hesarp13/hesarp13-e.pdf>

These lived experiences and expert perspectives provide valuable information for decision-makers and should be meaningfully incorporated into public consultation processes for antenna siting. They are directly relevant to assessing meaningful potential impacts on children, schools, families, and surrounding communities.

CE4ST urges ISED to uphold the principles of precaution, health and safety, transparency, independent evidence, meaningful public participation, municipal authority, environmental stewardship, accessibility, accountability, and inclusion.

Telecommunications deployment and regulatory efficiency can be achieved while strengthening these principles. Antenna-siting decisions should be locally responsive, evidence-informed, precautionary, and transparent, with particular consideration for children, vulnerable populations, and communities seeking lower-RF environments. Wired, fibre-optic infrastructure represents efficient telecommunications deployment



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which fosters public confidence, protects community interests, and promotes responsible infrastructure planning.

Canadians should have meaningful opportunities to know, understand and participate in decisions that may affect their health, homes, property, environment, and communities.

CE4ST reviewed industry, NGO and individual submissions to ISED's **Public Consultation DGSO-001-26, Amendments to the Tower Siting Process**. Based on our experience with affected communities, CE4ST's concerns align more closely with those raised by NGOs and individual Canadians than with industry submissions.

Transparency and Equal Representation: CE4ST's Concern Regarding the Delayed Posting of Its Submission: While numerous submissions regarding ISED's proposed changes were posted on the consultation webpage in a timely manner, we were surprised to find that CE4ST's comprehensive submission had not been included. This delay raised concerns that our submission would not receive the same opportunity for public visibility, including potential media attention. Our submission provided a detailed analysis of the potential and already experienced impacts on children, medically vulnerable individuals, persons with disabilities, and communities, and emphasized the importance of meaningful public participation, municipal involvement, and transparent decision-making.

We later learned that submissions from other non-profit organizations had also experienced delays in being posted. In addition, The Electrosensitive Society submission was also posted as an individual submission, rather than an NGO submission.

Non-profit organizations (NGO's) are an essential part of Canada's public consultation process: NGO's represent the interests of communities, provide independent expertise, and amplify the voices of Canadians who may otherwise be unable to participate effectively. Their contributions help ensure that government decisions are informed by a balanced consideration of public health, accessibility, education, environmental stewardship, community well-being, and the public interest, not solely by commercial or industry perspectives. Meaningful engagement with non-profit organizations strengthens transparency, public confidence, and evidence-informed policymaking.

We respectfully ask ISED to ensure that all eligible submissions are posted promptly, transparently, and equitably, so that Canadians, decision-makers, and stakeholders can fully understand the range of perspectives expressed through this consultation.



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A Precautionary Approach

History demonstrates the importance of acting on credible evidence before scientific uncertainty is fully resolved. Canadians have previously experienced widespread exposure to hazards such as **asbestos, lead, mercury, PCBs, and benzene** before their full consequences were recognized and regulatory protections strengthened.

Regulators should apply precaution proactively when credible scientific uncertainty remains. Where uncertainty exists regarding potential biological effects of RF-EMR, the appropriate response is to reduce unnecessary exposure and ensure affected Canadians have a meaningful opportunity to participate in decisions affecting their homes, schools, and communities.

CE4ST is concerned about the potential human-rights, health, environmental, property-value, insurance, and public-interest implications of increasingly pervasive wireless infrastructure. We believe safeguards should be **independent, science-based, transparent, and free from industry influence.**

Vulnerable Populations and Community Access

Children have decades of potential RF exposure ahead of them and spend significant time in schools, playgrounds, parks, and recreational spaces. Canadians who report significant sensitivity to RF exposure may have far fewer options for where they can live, work, and participate in community life.

For these Canadians, antenna siting is not simply a telecommunications issue; it can affect their ability to live, work, attend school, access essential goods and services, and participate in their communities.

Schools, daycares, homes, playgrounds, parks, hospitals, and densely populated areas therefore warrant heightened precaution, meaningful notice, and long-term planning.

As wireless infrastructure becomes increasingly ubiquitous, communities should also retain access to **RF-reduced public spaces**. Public policy should not assume that ubiquitous wireless connectivity is appropriate in every public space.

Independent Review of Safety Code 6 is Required

Safety Code 6 (SC6) does not adequately address potential short- and long-term health and biological effects associated with RF exposure. CE4ST shares concerns that



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the current framework does not sufficiently account for non-thermal biological effects, chronic exposure, cumulative exposure, newer technologies, or potentially vulnerable populations.

CE4ST therefore recommends that **ISED, in collaboration with Health Canada, undertake an independent, evidence-based review of SC6**, including its limits, methodology, and treatment of cumulative and long-term exposure, biological effects, and vulnerable populations.

Pending completion of this review, ISED should apply precaution, i.e., should not expand exemptions and should not weaken municipal and public consultation requirements based solely on compliance with existing SC6 limits.

Measure Exposure Where Canadians Actually Live

CE4ST recommends moving beyond a framework based primarily on theoretical compliance calculations and antenna height.

For proposed installations, proponents should:

- establish **baseline RF levels** before installation;
- model anticipated exposure following installation;
- identify locations where exposure could be highest;
- conduct representative **post-installation measurements**;
- publicly disclose methodology and results; and
- demonstrate that precautionary exposure objectives are met at residences, schools, playgrounds, and other sensitive locations.

This information should be available to municipalities and affected residents **before each final siting decision**.

Exposure assessment should also consider:

- cumulative and long-term exposure;
- lifetime exposure beginning in childhood;
- proximity to homes and schools;
- duration of exposure;
- multiple RF sources;
- potentially vulnerable populations; and



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- potential biological effects below established thermal thresholds.

Municipal Authority and Meaningful Consultation

Municipalities are best positioned to understand local land use, sensitive locations, community characteristics, and cumulative impacts. They require sufficient authority, time, and technical information to make informed decisions.

CE4ST therefore also recommends that ISED **pause the proposed amendments to CPC-2-0-03 and undertake a comprehensive, independent review of Canada's antenna-siting policy** before proceeding with changes that would unacceptably restrict public participation, weaken municipal authority, or diminish transparency.

Meaningful consultation must provide timely information, sufficient time for review, and a genuine opportunity for communities to influence outcomes.

CE4ST recommends that ISED:

1. Conduct an independent review before changing the antenna-siting framework.

A review should build on the **2003/2004 National Antenna Tower Policy Review (Townsend Report)** and consider the dramatic expansion of wireless infrastructure and newer technologies such as 5G and beamforming.

2. Preserve meaningful public notification for all proposed antenna installations.

Tower height alone is not an appropriate measure of community impact or potential exposure. Antennas near homes, schools, daycares, playgrounds, parks, and other sensitive locations warrant direct notification. Affected residents within **500 metres** should receive notice through multiple channels, including postal mail, email, and online notification.

3. Preserve the 120-day municipal consultation period.

Shortening this period to 45 days could prevent municipalities from obtaining expert advice, consulting residents, assessing alternatives, and fully evaluating complex proposals. Automatic approval because a municipality cannot meet an arbitrarily shortened deadline is not meaningful consultation.



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4. Protect municipal authority and locally developed siting protocols.

Locally developed protocols should not be displaced by a one-size-fits-all national process.

5. Ensure consultation is genuinely open and inclusive.

Residents, parents, educators, municipal officials, medical and scientific experts, and others with relevant knowledge should be able to contribute. Health, environmental, visual, property-value, community-character, and quality-of-life concerns should not be dismissed; ISED's list of allowable concerns is far from comprehensive.

6. Ensure public submissions become part of the official record.

ISED or another appropriate public authority should independently maintain consultation records so Canadians can see what concerns were raised, how they were considered, and why decisions were made.

7. Require independent verification.

The party financially benefiting from infrastructure deployment should not be the sole authority responsible for demonstrating compliance. ISED should establish independent auditing and verification mechanisms.

8. Require meaningful RF assessment and disclosure.

Before approval or installation, proponents should disclose operating frequencies, transmitted power, antenna configuration and orientation, predicted exposure levels, and locations where the highest exposures are expected. Information should be clear, publicly accessible, and independently verifiable.

Where equipment, power levels, frequencies, or operating conditions change, the assessment should be updated.

9. Give enhanced consideration to schools and vulnerable populations.

Proposals near schools, daycares, homes, playgrounds, and other locations serving potentially vulnerable populations warrant heightened scrutiny and meaningful community participation.

10. Protect adequate opportunities for public participation.

Major consultations should not be compressed into holidays, summer recesses, or other periods when participation is predictably not feasible.

CE4ST's Fundamental Recommendation



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The purpose of consultation should not be to **make deployment faster by making public participation easier to bypass**. It should be to identify solutions that protect the communities where infrastructure is proposed or deployed.

No proposed antenna installation should be exempt from meaningful public notification and municipal consultation.

A modern antenna-siting framework should be **transparent, independent, evidence-informed, precautionary, and locally responsive**.

Canadians should have the opportunity to know **before** an antenna is installed near their home, their child's school, a playground, or their community, not after the decision has already been made.

ISED can responsibly advance efficient telecommunications deployment while strengthening democratic accountability. Meaningful consultation is an essential foundation for responsible infrastructure development; which can build public confidence, support informed decision-making and help communities achieve solutions that serve both connectivity and the public interest.

Thank you for your consideration of these concerns and for your commitment to a fair, transparent, and meaningful consultation process.

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CE4ST urges ISED to apply these principles:

Appendix I

Summary of Principles CE4ST Urges ISED to uphold

1. **Precaution:** Act proactively where credible scientific uncertainty remains rather than waiting for unequivocal evidence of harm.
2. **Health and safety:** Put the protection of human health, safety, and well-being at the centre of infrastructure policy, particularly for children and potentially vulnerable populations.
3. **Meaningful public participation:** Ensure Canadians have timely notice, adequate information, sufficient time, and a genuine opportunity to influence decisions that affect their communities.
4. **Transparency:** Make relevant technical, environmental, and RF-exposure information accessible, understandable, and publicly available before decisions are made.
5. **Independent, evidence-informed decision-making:** Ensure standards and decisions are informed by independent scientific and medical evidence, not by industry-generated assessments.
6. **Municipal authority and local knowledge:** Respect municipalities' ability to identify local priorities, sensitive locations, community impacts, and appropriate siting alternatives.
7. **Proportionality based on community impact, not simply tower height:** Recognize that a shorter antenna can still have significant implications depending on its location, proximity to homes, schools, and other sensitive areas.
8. **Environmental stewardship:** Consider cumulative, long-term, and local environmental impacts, including protection of valued public spaces.



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9. **Accessibility and inclusion:** Ensure consultation processes are accessible to people with disabilities, environmental sensitivities, and barriers to digital participation.
10. **Accountability:** Maintain an independent public record of concerns, responses, evidence, and decisions so Canadians can see how their input was considered.
11. **Equity and protection of vulnerable populations:** Ensure that people who may be disproportionately affected are not treated as an afterthought in infrastructure planning.
12. **Choice and lower-exposure environments:** Recognize the importance of maintaining public spaces where wireless exposure can be minimized and families can participate in community life.
13. **Fibre-first and least-impact infrastructure:** Where technically possible, give highest priority to solutions and infrastructure that are wired/fibre without wireless RF-emitting components.
14. **Public trust:** Ensure regulatory efficiency does not come at the expense of health, transparency, or informed democratic participation.

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