

**A PETITION to the City of Courtenay Mayor and City Councillors to
Not Issue a Statement / Letter of Concurrence to TELUS and Innovation, Science
and Economic Development (ISED) Canada re Proposed Cell Tower at
1000 Piercy Ave, Courtenay (BC 113127 – Courtenay)**

July 24, 2025

Background: A 46.0-Meter Wireless Telecommunications Monopole Tower (TELUS Communications Inc.) has been proposed for the City of Courtenay at 1000 Piercy Ave, Courtenay, BC V9N 3E6. Radiofrequency radiation (RFR) from cell towers has not been proven safe for insects, birds, animals, and trees. Canada does not have any established 'safety' limits for RFR exposure for wildlife and the environment. Birds and bats can also have collisions with towers, which can prove deadly. There is growing scientific evidence demonstrating the harm of RFR to humans, animals, and the environment. Safety can no longer be assumed. Until there has been adequate testing of wireless technology to prove it is not hazardous for human and animal health and the environment, then the precautionary principle should apply—in the interests of public health and environmental protection. We, the undersigned, are opposed to and do not consent to this tower.

Petition: We request that the City of Courtenay Mayor and Councillors **DO NOT** issue a statement / Letter of concurrence for the proposed wireless telecommunications monopole tower installation at 1000 Piercy Avenue (BC 113127 – Courtenay).

First & Last Name	Place of Residence (ie Courtenay) + Postal Code	Email Address (optional)	Signature
Sonja Limberg	V9N 3E4 Courtenay		
Jessy Zagroba	V9J1N1 B.C.		
Stephynne Shuller	V9J 1S1		
Judy Racher	V9N7J3		
OLIVER CLARKE	V9N 1S1		
Loe Cassivi	Courtenay V9N 8X9		
LOUISE CASSIVI	Courtenay V9N 8X9		
Jordan Leighton	Courtenay V9N -7L6		
Sandie Jordan	V9N 3E4		
Louise Kent	V9N 3E4		
Robert George	V9N 3E4		
Diana McKay	V9N-3E4		

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First & Last Name	Place of Residence (ie Courtenay) + Postal Code	Email Address (optional)	Signature
Dawn Archison	Courtenay V9N 3A1	/	
Pam Morrison	Courtenay V9N 3P2		
Anne & Hunter	Courtenay		
Morgan Kieber	Courtenay		
Maya Varela	Cumberland		
Marion Hoerberg	Kiwanis Village Courtenay	/	
Shirley Wesley	COURTENAY V9N 8S2	/	
VIRGINIA Tomlinson	COURTENAY V9N 9P7	/	
Greta Jansen	Courtenay V9N 6H5		
Bonnie Larush	Courtenay V9N 9C6	/	
Marianne Finnie	Comox V9M 2X7	/	
Cheryl Jacobs	Qualicum Beach	/	
Recho Goulette	Merrville	/	

FW: Cell Phone Tower - 1000 Piercy Avenue

From Schile, Jamai <jschile@courtenay.ca>

Date Thu 9/4/2025 9:31 AM

To Stewart-Jones, Andrew <astewartjones@courtenay.ca>; PlanningAlias <planning@courtenay.ca>

Update – for all correspondence the City/DS receives regarding the proposed DVP amendment for 1000 Piercy Ave, please direct to Andrew and ‘cc’ myself.

Andrew – please file as part of the DVP tempest file as this will be needed for the staff report in Oct.

Any questions, please let me know.

Thank you
Jamai

From: PlanningAlias <planning@courtenay.ca>

Sent: Wednesday, August 27, 2025 10:27 AM

To: Schile, Jamai <jschile@courtenay.ca>

Subject: FW: Cell Phone Tower - 1000 Piercy Avenue

Ashly Wiggins | City of Courtenay
Development Services Clerk

T 250-703-4839 | E planning@courtenay.ca



830 Cliffe Avenue , Courtenay, B.C. V9N 2J7

courtenay.ca | [Facebook](#) | [LinkedIn](#) | [Instagram](#)

I respectfully acknowledge that the land on which we gather and work is the Unceded traditional territory of the K'ómoks First Nation.

From: Seamus McConville <[REDACTED]>
Sent: Tuesday, August 26, 2025 8:55 PM
To: PlanningAlias <planning@courtenay.ca>
Subject: Cell Phone Tower - 1000 Piercy Avenue

Hi there,

I am writing to express my support for the forthcoming Development Variance Permit application for the proposed cell tower at the Public Works Yard.

I have noticed some materials circulating in the community raising opposition to the project and encouraging opposition comments, primarily citing unsubstantiated health concerns related to 5G technology. While I respect that residents may have questions, it is important to recognize that these claims are not supported by scientific evidence, and I believe it would be a loss for the community if an important public amenity were derailed by misinformation.

It is also worth noting that frustration has been expressed more broadly in the community about cell towers being rejected in the Valley. For example, in a recent online discussion (see: [Comox Valley Reddit thread](#)), a number of residents voiced concern that needed infrastructure projects of this nature keep being stalled. This suggests that there may be wider public support for improved cell coverage than is reflected in the more vocal opposition.

From my perspective, the Public Works Yard is an ideal and appropriate location for this infrastructure. Improved cell coverage will benefit residents, visitors, and businesses alike, and this site offers a practical setting that minimizes visual and land-use impacts.

As an aside - is there a slated date for this file to go to council?

Thanks,

--

Seamus McConville

████████ Cumberland Rd, Courtenay, BC V9N 2E7

████████████████████

September 22, 2025

City of Courtenay
830 Cliffe Ave
Courtenay, BC V9N 2J7

Dear City of Courtenay Mayor and Councillors,

Re: New 46 metre Proposed Cell Tower at 1000 Piercy Ave

I am a resident of the Comox Valley and I spend a considerable amount of time in the City of Courtenay. In the past I have worked in the City of Courtenay and I expect to again. I am concerned with the volume of wireless antenna and towers that currently exist, never-mind, any new proposals. I have written to the Telecom Consultant, Brian Gregg (SitePath Consulting) about this proposed tower and I feel the need to write to each of you also. To date, I am aware of **7 towers** that have been proposed in the last 4 or 5 years, 4 of them proposed on ALR land.

- 1000 Piercy Rd. Ave, City of Courtenay (TELUS) - **Council to Vote Oct 1**
- 2981 Moray Ave, City of Courtenay (TELUS) - DVP + Letter of Concurrence Granted
- 1901 Larch Rd, CVRD Area C (ROGERS) – **Area Directors to Vote Yet**
- 1351 Larkin Rd CVRD Area C (ROGERS) – Letter of Concurrence NOT granted
- 1388 Ellenor Rd, CVRD Area B (TELUS) – Letter of Concurrence Granted
- 2505 Dove Creek Rd, CVRD Area C (TELUS) – Letter of Concurrence NOT granted
- Hornby Island, CVRD Area A (ROGERS) - Islands Trust is the voting party

Doug, the TELUS representative said at the public meeting for this proposed tower that the other odd shaped tower just down the street from 2981 Moray Ave (very close to Top Shelf) is due to be upgraded also, so that's **8** new proposed tower for the greater Comox Valley! Why so many?

Remember when we were all told that smoking was safe and how it took 20 years for the Government to make changes? Or recall when DDT and asbestos were considered safe and widely used, or how about lead in fuel and plumbing or BPA used in all sorts of plastics, including baby bottles and toys? Sadly, there are many examples in history of this type of deception. If there is doubt, the precautionary principal should be applied! Are you aware that there are safe tech alternatives? How many people are unaware of symptoms that they feel could actually be attributed to exposure to wireless radiation? In fact, there are now more Canadians that feel the negative effects from wireless technology than there are that have peanut allergies!

Have cell towers been proven safe? Believe it or not, no they haven't. This letter contains many links to evidence of potential harm. **Can you cite one safety study showing that wireless technology is safe?** The Government can't, as confirmed by a FOI. See [page 20 of the attached VISTA Appendix to the Delegation](#) delivered to the CVRD EASC on Feb 24, 2025. How Did Health Canada Determine Wireless Radiation is Safe for all 24-7? Health Canada (HC) makes a claim that wireless radiation is safe for everyone, 24 hours a day, 7 days a week but the test length was only 6 minutes (table 5). Info copied and pasted:

FOI Original Request: Regarding any studies that HC used to make their Safety Code 6 claim of safety for anyone to continuously be exposed to multiple sources of RF-EMR, including 5G - this includes any

studies conducted by Health Canada or by someone else. I am requesting a comprehensive list [including the author(s), name(s), date, study title, journal name where the study was published and a url link] to the references used in those studies.

Health Canada Response: "Having completed a thorough search, we regret to inform you that we were unable to locate any records responsive to your request; **no such list exists.**" - Office of the Information Commissioner of Canada

Canada has no long term safety guidelines, their guideline is based on just 6 minutes of exposure. Heath Canada Safety Code 6 is only a guideline and it is only applicable to humans! Canada does not have any safety guidelines for insects, pollinators, animals, trees or the environment. It is naive to assume safety of wireless technology - show me the (non-industry funded) studies that prove safety. I know, there is so much information to dig into here - I hope you are brave enough to look. I would like to direct your attention to the Affidavit of Magda Havas, PhD., page 55, available here: https://emfaware.ca/docs/-Magda_Havas_May_15_2019.pdf

6. It is unclear which scientific documents HC relied on for their guidelines and which ones they ignored as no monograph has been produced and no references are provided. This is in sharp contrast to the two excellent monographs produced by IARC for ELF (2002) and RF (2012) exposure. What is missing is transparency.

I would encourage you to continue reading on page 55 and beyond as she states (under oath): "**Health Canada provides the following myths/facts that I challenge below:**" Many important points and facts are made. Such as on page 57.

149. HC Fact: There is no evidence that children and teenagers are at increased risk when Safety Code 6 exposure limits are respected.

150. My Comments: Hardell et al (2009) showed that young people who used a cell phone before the age of 20 had a greater risk of developing a brain tumor than did adults. Gandhi et al (1996) showed that radiation from a cell phone penetrates much more deeply into the brain of a children than that of an adult (Figure 8).

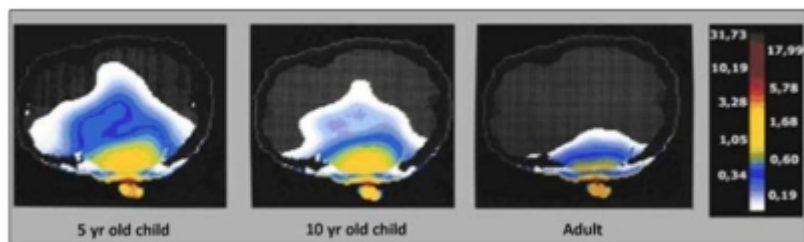


Figure 8.

Depth of absorption of cell phone radiation in a 5-year old child, a 10-year old child, and in an adult from GSM cell phone radiation at 900 MHz. Color scale on right shows the SAR in Watts per kilogram. Source: Gandhi et al., 1996.

Or on page 58:

154. HC Fact: Canada's limits are consistent with the science-based standards used in other parts of the world, including the United States, the European Union, Japan, Australia and New Zealand.

155. My Comments: Countries that rely on the science-based evidence recognize non-thermal effects and hence have much lower guidelines than does Canada. Guidelines globally fall into one of three categories: thermal, non-thermal and precautionary principle. Canada's guidelines are thermal and are the least protective.

Are you aware of the HESA Recommendations on Radio Frequency Radiation? See the link below for [Affidavit. Havas. pages 60 - 66](#)

179. In 2010 and again in 2015, The Standing Committee on Health (HESA) held hearings on Radio Frequency Radiation and made a number of recommendations to the Government of Canada. Those recommendations are summarized in Tables 3 and 4.

180. To my knowledge, **the Government of Canada and its various Departments and Agencies have largely ignored these recommendations.**

Also refer to [pages 23 - 24](#) of the attached [VISTA Appendix to the Delegation](#) delivered to the CVRD EASC in February for more information and links re the HESA recommendations. Here is one:

Recommendation 6 (of 12), stated: **That Health Canada ensure the openness and transparency of its processes for the review of Safety Code 6, so that all Canadians have an opportunity to be informed about the evidence considered or excluded in such reviews**, that outside experts are provided full information when doing independent reviews, and that the scientific rationale for any change is clearly communicated.

The fact of the matter is, **Health Canada Safety 6 is outdated and flawed. YOU are the elected officials for the residents of the City of Courtenay and you have a responsibility to your constituents. I urge you to take time to educate yourself on this topic. Has TELUS informed you that wireless technology is considered an environmental pollutant or that there are industry exclusions for RF / EMR? Does the City of Courtenay have insurance without RF / EMR exclusions?** If yes, can that information be shared with residents and the general public? There are residences and two day care centres located in close proximity to this proposed tower. Have the parents of the children attending the daycare been properly informed? Honesty and transparency is the way to build trust. Are you aware of the TELUS annual report to shareholders? See below for more information and for a link to read more.

<https://ehtrust.org/reports-white-papers-insurance-industry/>

<https://ehtrust.org/wp-content/uploads/Swiss-Re-SONAR-Publication-2019-excerpt-1.pdf>

Page 6: "To allow for a functional network coverage and increased capacity overall, more antennas will be needed, including acceptance of higher levels of electromagnetic radiation. In some jurisdictions, the rise of threshold values will require legal adaptation. **Existing concerns regarding potential negative health effects from electromagnetic fields (EMF) are only likely to increase. An uptick in liability claims could be a potential long-term consequence.**" [...] **As the biological effects of EMF in general and 5G in particular are still being debated, potential claims for health impairments may come with a long latency**

Three Very Important Questions re Liability

- 1. Does the City of Courtenay have adequate insurance coverage for radio frequency / electromagnetic frequency damage?**
- 2. Does the City of Courtenay have a clause within the contract (with Telecom) to remove the tower should**

people become ill?

3. Is the City of Courtenay aware of the privacy and security risks that this wireless technology brings?

In her final comments of her Affidavit on page 71, Magda Havas stated "**These effects and these studies cannot continue to be ignored.**" I would also encourage you to watch her short video (less than 10 mins) Pros & Cons of 5G - Magda Havas, PhD. <https://www.youtube.com/watch?v=kxeellJNOLA>

I hope you make some space in your world to look into some of this information. I know it's a lot to take in but it's very important. **Your decision could have lasting negative impacts for people, animals and the environment for years to come.** How much do you really know about the non industry funded science? I urge you to dig in. Magda covers that on pages 22 and 23 of her Affidavit.

As the Elected Representatives of the Residents of the City of Courtenay, You Can Say NO!

Please do NOT grant a statement / letter of concurrence for the proposed tower at: 1000 Piercy Avenue

Sincerely,

Hilary Jones

A Tax Paying Resident of the Comox Valley

VIDEO Link: VISTA Delegation to the CVRD EASC 2025-02 (starts at the 1:56 minute mark)

https://www.youtube.com/watch?v=qX_e_l63pbs

Attached: Appendix to the VISTA Delegation to the CVRD EASC February 24, 2025

Link to AFFIDAVIT of Dr. Magda Havas, B.Sc., Ph.D May 15, 2019 [https://emfaware.ca/docs/5G Affidavit - Magda Havas, May 15, 2019.pdf](https://emfaware.ca/docs/5G%20Affidavit%20-%20Magda%20Havas,%20May%2015,%202019.pdf)

Link to Evidence presented to the House of Commons - HESA Committee

<https://www.ourcommons.ca/DocumentViewer/en/41-2/hesa/meeting-57/evidence>

Extra Info You Should Be Aware Of:

Tech Giant's Intimidation and Subversion Tactics to Evade Regulation in Canada and Globally

<https://www.ourcommons.ca/DocumentViewer/en/44-1/CHPC/report-13/>

"It's about lobbying. It's about framing the narrative. It's about creating alliances and setting up front groups and astroturfing campaigns. It's about influencing or buying think tanks and academics. It's about hospitality. It's about political support and funding. It's using philanthropy. It's also about litigation and intimidation, and about the use of international pressure. "

Telus Annual Report 2024,

https://assets.ctfassets.net/fltupc9ltp8m/6Et0hE0AM9f2Ouiu4LrWkR/8fdde84e1b983ab431820b10feae2793/TELUS_AR24_Eng_FINAL-s.pdf?

Page 88 'Changes over the past 12 months' [..]"Potential impacts associated with low levels of non-ionizing radio frequency (RF) emissions from mobile phones and cell towers have been a matter of public concern, and we anticipate that they will continue to be a public concern as we deploy 5G

network technology, with the number of small cells in our infrastructure expected to increase as we continue to upgrade our network." [...]

Canada's RF Exposure Guidelines Vs. Other Countries

So how does Canada compare to other countries? Don't take their word for it, look it up. Some **other countries** base their limits on biological effects (unlike Canada) and have RF exposure **limits 100x lower than Canada!**

<https://safelivingtechnologies.com/content/Education/RF-ExposureGuidelines-International.pdf>

International Radio Frequency "RF" Exposure Limits for 1800 MHz Range
(Cell Phones and Cell Towers, 5G, WiFi, Smart Meters, etc...)

Location	Reference	Exposure time	Limit Based On	Lower by	µW/m2
Most of Western Europe	IEEE C95.1-1999 and ICNIRP	30 minutes	Thermal / Heating	-	10,000,000
USA	(FCC) IEEE C95.1-1999 and ICNIRP	30 minutes	Thermal / Heating	-	10,000,000
Canada	Safety Code 6, Table 5 (2015)	6 minutes	Thermal / Heating	2.3 x	4,393,278.4
Russia	Sanitary Norms and Regulations 2.2.4/2.1.8.055-96	3 hours +	Biological Effects	100 x	100,000
China	UDC 614.898.5 GB 9175 -88	3 hours +	Biological Effects	100 x	100,000
Italy	Sanitary Norms and Regulations 2.2.4/2.1.8.055-96	3 hours +	Biological Effects	100 x	100,000
Most of Eastern Europe	Sanitary Norms and Regulations 2.2.4/2.1.8.055-96	3 hours +	Biological Effects	100 x	100,000
Switzerland	Ordinance on Protection from Non-ionising Radiation (NISV)	Long Term	Precautionary	100 x	100,000

State of New Hampshire Final Report of the Commission to Study The Environmental and Health Effects of Evolving 5G Technology [https://gc.nh.gov/statstudcomm/committees/1474/reports/5G final report.pdf](https://gc.nh.gov/statstudcomm/committees/1474/reports/5G%20final%20report.pdf)

The 5G Report recommends US federal agencies coordinate **“to protect people, wildlife, and the environment from harmful levels of radiation”** and states **“until there is Federal action, New Hampshire should take the initiative to protect its environment.”**

See the above link or page 39 of VISTA Appendix to the Delegation delivered to the CVRD EASC for more info.

Andrew Campanelli, Attorney on 4G/5G: The Telecommunications Act of 1996, What Local Governments Need to Know - in plain English <https://www.youtube.com/watch?v=wMX6tX2AWTE>

What does it mean when they call 5G Safe in recent headlines? <https://ehtrust.org/eht-responds-what-recent-headlines-mean-when-they-call-5g-safe/>

Two Recent Reviews:

“Evidence for a Health Risk by RF on Humans Living Around Mobile Phone Base Stations: From Radiofrequency Sickness to Cancer” [base stations = cell towers]

<https://pubmed.ncbi.nlm.nih.gov/35843283/>

Extract: "Overall results of this review show three types of effects by base station antennas on the health of people: radiofrequency sickness (RS), cancer (C) and changes in biochemical parameters (CBP)."

“Effects of Non-Ionizing Electromagnetic Fields on Flora and Fauna, Part 1. Rising Ambient EMF Levels in the Environment” (3 part review, close to 1000 references)

<https://pubmed.ncbi.nlm.nih.gov/34047144/>

Extract: "Broad wildlife effects have been seen on orientation and migration, food finding, reproduction, mating, nest and den building, territorial maintenance and defense, and longevity and survivorship. Cyto- and geno-toxic effects have been observed."

More than 40 peer reviewed scientific studies have documented evidence of biological harm to people living within 400 meters (of a base station).

<https://ehtrust.org/cell-towers-and-cell-antennae/compilationofresearch-studies-on-cell-tower-radiation-and-health/>

A recent review: Balmori, A. (2022). **Evidence for a health risk by RF on humans living around mobile phone base stations: From radiofrequency sickness to cancer.** Environmental Research, 113851. <https://doi.org/10.1016/j.envres.2022.113851>

[Mobile phone base stations include cell tower antennas. Electrohypersensitivity is sometimes called Radiofrequency Sickness.]

ABSTRACT: "The objective of this work was to perform a complete review of the existing scientific literature to update the knowledge on the effects of base station antennas on humans. Studies performed in real urban conditions, with mobile phone base stations situated close to apartments, were selected. Overall results of this review show three types of effects by base station antennas on the health of people: radiofrequency sickness (RS), cancer (C) and changes in biochemical parameters (CBP). Considering all the studies reviewed globally (n = 38), **73.6% (28/38) showed effects:** 73.9% (17/23) for radiofrequency sickness, 76.9% (10/13) for cancer and 75.0% (6/8) for changes in biochemical parameters. Furthermore, studies that did not meet the strict conditions to be included in this review provided important supplementary evidence. [...]

Other relevant studies indicating harm for those living close to cell towers (base stations):

1. Rodrigues, N. C. P., Dode, A. C., de Noronha Andrade, M. K., O'Dwyer, G., Monteiro, D. L. M., Reis, I. N. C., ... Lino, V. T. S. (2021). The Effect of Continuous Low-Intensity Exposure to Electromagnetic Fields from Radio Base Stations to Cancer Mortality in Brazil. International Journal of Environmental Research and Public Health, 18(3). <https://doi.org/10.3390/ijerph18031229>

2. Zothansiyama, -, Zosangzuali, M., Lalramdinpuii, M., & Jagetia, G. C. (2017). Impact of radiofrequency radiation on DNA damage and antioxidants in peripheral blood lymphocytes of humans residing in the vicinity of mobile phone base stations. Electromagnetic Biology and Medicine, 1-11. <https://doi.org/10.1080/15368378.2017.1350584>

Key Scientific Evidence:

<https://mdsafetech.org/science/>

<https://www.emf-portal.org/en>

<https://www.wildlifeandwireless.org/science>

<https://ehtrust.org/science>

<https://bioinitiative.org/conclusions/>

<https://www.5gappeal.eu>

<https://www.appel5gappeal.ca>

**DELEGATION APPENDIX AND REFERENCES TO THE COMOX VALLEY
REGIONAL DISTRICT (CVRD) ELECTORAL AREAS SERVICES
COMMITTEE (EASC) MEMBERS AND CHAIR**

**ALL PROPOSED TOWERS FOR THE COMOX
VALLEY REGIONAL DISTRICT 2022 - PRESENT**

PRESENTED ON FEBRUARY 24, 2025
BY HILARY JONES, CVRD RESIDENT + MEMBER OF
VANCOUVER ISLAND SAFE TECH ALLIANCE (VISTA)

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VISTA DELEGATION REQUEST

Name: Hilary Jones, CVRD Resident

Organization you are representing: VISTA - Vancouver Island Safe Tech Alliance

Primary purpose of the organization: To advocate for safe tech solutions and informed consent concerning wireless technology and cell tower placement.

Number of members: 200+

Subject matter: Re: ~~Proposed Cell Tower for 1351 Larkin Road (W6699 Williams Beach)~~ ALL proposed tower applications from 2021-Present + CVRD Policy P.89

I wish to present a suggestion for a motion to create a framework for which telecommunication (cell) towers could be placed. Specifically, not within 400 or 500 meters of schools, highly occupied residential areas or sensitive ecological areas.

I propose a revision to CVRD Policy P.89, to have more clear guidelines as to the acceptable proposed locations for cell towers.

How do we protect these sensitive areas from the known potential harms? How do the residents have meaningful input and engagement for this process? I propose a change to Policy P.89, to both empower council to engage with their constituents and to further strengthen residents voice to council.

Also, I would like to bring forward Director Arbour and Director Hardy's valid points and concerns, raised during the EASC meeting on July 15, 2024 regarding this tower. Examples include, "a lot of the residents do not want it" – Director Arbour and Director Hardy stated that even the CVRD's own staff expressed concerns about this tower.

Director Arbour also said, "look at a new policy perhaps if there is going to be a lot of proposals that specifically speaks to the level of public consultation, we have narrow opportunities to speak outside of that."

This proposed tower is in violation of ~~most~~ some of the CVRDs' Policy P.89. For example section 7.1b.v - the proposed location is 'within 400 metres of ecologically sensitive lands and park spaces with significant wildlife and bird habitat values'. https://www.comoxvalleyrd.ca/sites/default/files/docs/p89_telecommunications_antenna_system_policy_20220524.pdf

CVRD FUTURE HOME OF MANY MORE LARGE CELL TOWERS?

1. 3505 Dove Creek Road (CVRD Area C: 62 meter Telus Tower – letter of concurrence NOT granted Mar 2024)
2. 1388 Ellenor Road (CVRD Area B: 43 meter Telus Tower – letter of concurrence was granted June 2024)
3. Hornby Island (CVRD Area A | Island's Trust): 63 meter Rogers Tower

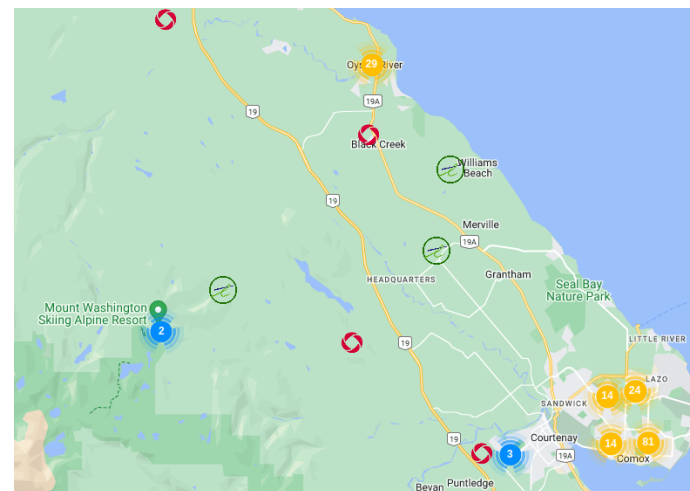
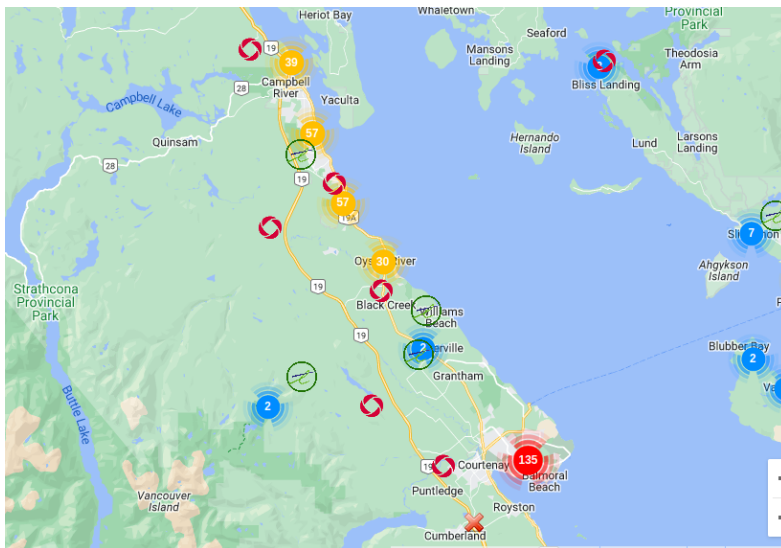
Crown Land File: #1415337. crown land location proposed . Residents have opposed for over a year. Public comments closed July 24, 2024.

4. 2981 Moray Tower (City of Courtenay: 48 meter replacement Telus Tower – letter of concurrence granted)
5. 1351 Larkin Road (CVRD Area C: 63 meter 5G Rogers Tower – letter of concurrence NOT granted Dec 2024)
6. 1901 Larch Road (CVRD Area B: 53 meter Rogers Tower. Public consultation closes February 28, 2025)
7. Are there more? And if so, how many more?

MAPS OF EXISTING TOWERS AND SMALL CELL ANTENNA

How many cell towers and small antenna are enough?

Each logo represents a cell towers. The numbers (inside a circle) represent small cell antenna &/or may represent multiple towers. These map images were captured in 2024. <https://www.scadacore.com/tools/rf-path/cell-tower-map-canada/>



EMERGENCY COMMUNICATIONS + 911 SERVICE

February 10, 2025 Ian W Ham, the Fire Chief of Union Bay/Fanny Bay confirmed the following (our emphasis added).

Emergency Communications & 911 Service

Emergency services in the Comox Valley, including fire and police, use a dedicated radio network that is separate from commercial cell providers like Rogers, Telus, or Bell. Our dispatch communications operate on a secure system designed for reliability, even in the event of a telecom provider outage. While a major failure of multiple networks could pose challenges, emergency responders have contingency plans in place, including backup radio systems and satellite communications when necessary.

For public 911 calls, if a providers network goes down, calls may still be routed through any available tower, regardless of the carrier, as long as a signal is available. However, in the case of a widespread outage affecting all providers, access to 911 could be impacted, which is why **maintaining landline options or alternative communication methods is advisable in emergencies.**

2017 Glen Byrne, Commander of the RCMP Operational Communications Centre. Confirmed "Any cell phone, even if it's deactivated, will call 911 if it's charged,"

A person can make emergency phone calls without a network signal. When your phone loses signal from your provider's network, it automatically connects to the strongest network that it can find in order to allow for emergency calls to go through. However, since it is not your network, you cannot make other calls.

<https://www.rcmp-grc.gc.ca/en/news/2017/8/rcmp-remind-citizens-deactivated-cell-phones-can-call-911>

International Association of Fire Fighters (IAFF): Opposes cell tower base station &/or antenna's on fire stations. Cell Tower Radiation Health Effects:

<https://www.iaff.org/cell-tower-radiation/>

Excerpt: [...] **IAFF oppose the use of fire stations as base stations for towers and/or antennas for the conduction of cell phone transmissions until a study with the highest scientific merit and integrity on health effects of exposure to low-intensity RF/MW radiation is conducted and it is proven that such sitings are not hazardous to the health of our members.** [...] There are **established biological effects from exposure to low-level RF/MW radiation.** Such biological effects are recognized as markers of adverse health effects when they arise from exposure to toxic chemicals for example.

WHY ISN'T TELECOM PROMOTING NON WIRELESS SOLUTIONS?

Telecom companies are supposed to share space on towers according to ISED (CPC 2-0-03), but the trend has been that each company wants their own tower, to provide service to their customers. Sometimes an area is serviced by one company but not another, so the one that doesn't have coverage makes a new tower application. Are new towers designed to be shared in the first place and are there any consequences if they aren't shared? Claims that existing towers are "overloaded" are often enough reason to justify the proposal for another tower, just down the road. Are these claims being substantiated?

Where does the expansion of telecom (towers/antenna's) end? Who monitors how many towers there are in any one region? Are there limits for how many are enough, to provide full service coverage? Is such a concept possible? Or will their be a forever-growing need for more towers and more EMF transmissions? Unfortunately, it seems that telecom companies are expanding their wireless network as fast as possible, with the blessing of the government.

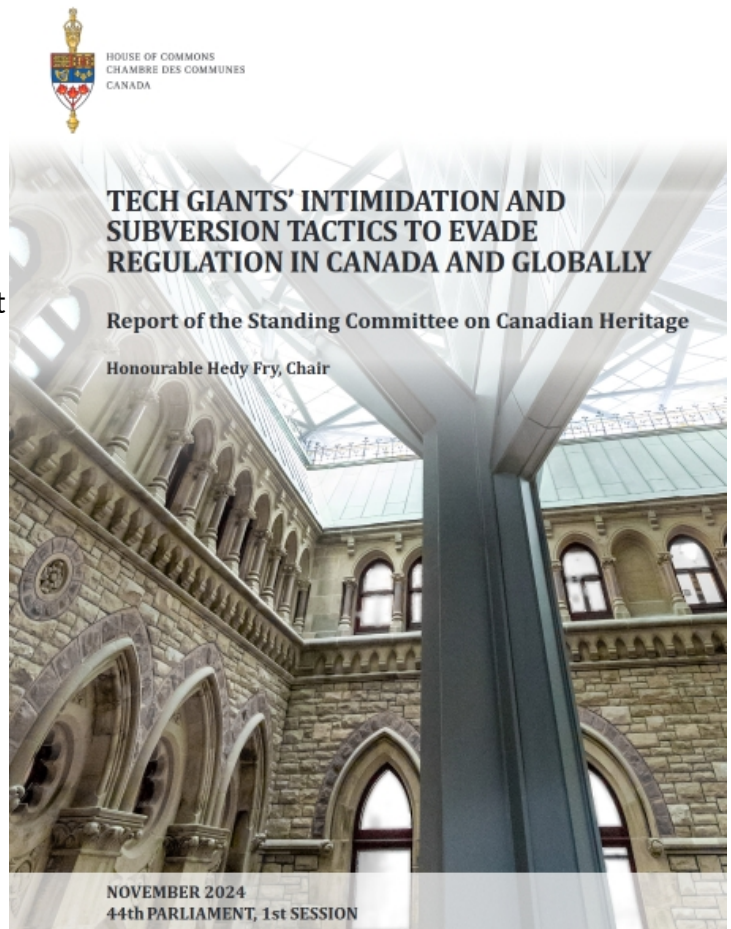
TECH GIANT'S INTIMIDATION AND SUBVERSION TACTICS TO EVADE REGULATION IN CANADA AND GLOBALLY

Tech Giant's Intimidation and Subversion Tactics to Evade Regulation in Canada and Globally

<https://www.ourcommons.ca/DocumentViewer/en/44-1/CHPC/report-13/>

"It's about **lobbying**. It's about **framing the narrative**. It's about creating alliances and setting up front groups and astroturfing campaigns. It's about **influencing or buying think tanks and academics**. It's about **hospitality**. It's about political support and funding. It's using philanthropy. It's also about **litigation and intimidation**, and about the use of international pressure. "

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SAFE TECH SOLUTIONS

Wired connections are faster and more secure. Wireless transmission of data is more susceptible to hacking and security breaches.

Hard wired Ethernet cable connections work great at home. Including **fibre optics to and through the premises (FTTP) without any wireless is more reliable, secure and safer.** Fibre optics cables have now been installed throughout the Dove Creek and surrounding areas. It's likely just a matter of time before it's installed in other areas of the Valley.

There are many communities on Vancouver Island and within the Comox Valley that are pleased with their FTTP connections. **Connected Communities**, Wired Networks for Crossing the Digital Divide, is an excellent resource: <https://connected-communities.ca>

Landline Telephones at home or a business are a solid reliable option. Cell phones can easily be forwarded to a landline. There are also adapters for cell phones to be used safely at home.

VOIP Phones (Voice Over IP) are very affordable and portable. They work using your internet, can be hardwired and can move with you to another location effortlessly on the fly.

Adapters

There are **adapters** available to hard wire (via Ethernet cable) **cell phones, tablets and computers.**
How to hardwire: <https://ehtrust.org/wp-content/uploads/How-to-Hardwire-5.jpg>

Powerline adapters can be used to send the internet signal through the powerlines, so you can don't have to run an Ethernet cable from room to room. Note: the safest option is to select a powerline adapter that doesn't emit or extend wireless signals. One option: D-Link Powerline AV2 1000 Gigabit available via Staples and Amazon. Here is a short video showing how easy they are to install and use: 'D-Link DHP-601AV powerline. 'Unboxing, installation and test'
https://www.youtube.com/watch?v=m6tF_FbyALU

OTHER ALTERNATIVE OPTIONS FOR CELL COVERAGE

SAT Phone

Satellite (SAT) phones can be used in remote areas or elsewhere where there is no cell service. While this option does still emit a RF (radio frequency) signal, ideally you would only turn it on when needed. It would remain turned off when not required and thus, reducing the exposure to RF radiation.

Starlink - Satellite to Home/Anywhere

Elon Musk's Starlink is also available and there is an option to hard wire within the home.

Satellite to Cell Phone Coverage now available

There is now satellite direct to cell service available for those who want it.

REASON'S TO STRENGTHEN THE CVRD CELL TOWER SITING ANTENNA POLICY (P89)

- To further protect the CVRD'S vital ALR (Farm) Land, Residents and the Environment/Wildlife
- Health Canada Safety Code 6 is minimal at best, outdated and flawed
- ISED Regulator and Beneficiary – Conflict of Interest? ISED refers back to Municipality
- There is evidence of harm from wireless technology even if the Federal Government chooses to ignore it

Cell tower applications are steadily being put forward in the CVRD. 3 applications in a row warranted a lot of public attention and opposition in 2024, 2023 and 2022. At the Dec 9, 2024 meeting, the EASC Directors asked Staff to look at the policy (P89) that is currently in place. Since that time, there is now a 4th telecommunications tower application.

To the CVRD Area Directors and Board Members, we the residents ask you to put forth a strong motion to modify CVRD Policy P89 and make meaningful changes to strengthen it. Please pause cell tower applications until the policy has been finalized.

Have Vision & Strength - Represent Your Community - Ensure our Community Thrives

- Be the heros who stand up for people, children, animals, the ecosystem and the economy.
Other communities have done it, we can too. - CVRD Resident, Leah McCulloch

Municipalities have a fiduciary responsibility to represent their public constituents, not Telecom companies – local governments are ultimately responsible for the safety of ALL its citizens. Unfortunately, most people are completely unaware that Heath Canada's outdated Safety Code 6 Guideline (not regulation) has been critiqued severely by EMF experts, including medical and science societies, from all corners of the world, as Non-Protective. As the authority, you are supposed to make informed decisions – how can you do this when there is no long term safety data for wireless radiation?

Could there be areas where there are not telecommunication towers and small cell antenna placements everywhere? Let the Comox Valley be the control group and see what can happen. Why not propose EMF free zones or areas in which tower placements are more acceptable, such as away from people and wildlife. Educate the public and ourselves about alternatives to wireless, so they can choose when to use it. Provide education about the potential harms of wireless radiation, which is what we've attempted to do here. VISTA members would be happy to assist the CVRD with safe tech public education campaigns.

The Comox Valley is a very special place, protect the exceptionally beautiful landscapes and mountain views that we have here. Aesthetically, towers are a visual pollutant and they emit electro-pollutants 24-7.

**As the Area Directors of the CVRD EASC and Board Members –
You Can Create and Implement a very strong cell tower siting policy for the Comox Valley.
Create meaningful criteria for where towers are placed in our community.
There are safer tech solutions for communications that can be explored.**

ANTENNA SITING POLICY EXAMPLES + SUGGESTIONS

Richmond Hill, ON

<https://www.richmondhill.ca/en/shared-content/resources/documents/2024-Development-Applications/2024-Radio-Communication-and-Broadcasting-Antenna-Systems-Public-Consultation-App.pdf>

This is a good policy but there are some areas that could be strengthened. Here are some suggestions*:

- Appendix 4 Public Notice Sign Template – improve the information on the sign.
- Change all references to Industry Canada to Innovation, Science and Economic Development Canada (ISED).
- Have the public consultation timeline stated as business days, also to be reflected on the flowchart.
- Whenever concurrence is used that "or non concurrence" be added so people know there is an option.
- State local duly elected officials duties to show that they have the power to issue a concurrence or non-concurrence and the proponent can take it to ISED Dispute Process if they disagree.
- State there are two parts that have weight in the decision making process: 1) Land use (e.g. Comox Valley Regional District - CVRD) and 2) Public consultation. BOTH must be satisfactorily completed in order for a concurrence to be issued.
- Proponents must provide, to the CVRD, proof of delivery of the public information package to each residence in the notification radius (e.g. registered mail or at least something with a signature) at their own expense. Radius for notification to include residents of units such as care homes, rental units, commercial rental units, condos, private residences, etc. to avoid a landlord/property owner being advised and residents renting premises not being notified.
- Appendix 2, Section 7.2 Role of the City. Change the wording, so that the public sends questions directly to the proponent; the proponent answers directly to the public and relays all communication with the public to the City. Leave in wording 'The City shall also be responsible for reviewing the proposal submission and preparing land-use planning comments that are to be provided to the proponent and copied to Industry Canada.'
- The protocol doesn't provide a setback from residences, schools, hospitals, etc., a suggestion would be 400 meters.
- The proponent document, in writing, liability insurance that DOES NOT EXCLUDE health claims due to radiofrequency (RF) radiation exposure.
- That the proponent attests that they are fully accountable and accept full responsibility for all information, verbal and written, (including responses to questions asked by residents and public during the public information session and questions and comments submitted in writing) conveyed by their designated representative/consultant/agent/3rd party acting on their behalf. The proponent agrees to respond to questions and concerns that are not adequately addressed by their designate within 30 days of receiving an escalation request from the concerned residents and public.
- The timeline of the consultation process is clearly laid out in the notification package including dates. The 30-day period for the public to submit questions to the proponent begins the day after the public information session. The proponent is required to answer and respond to all follow up questions, submitted by the public in the 21-day period, directly to the whomever submitted the follow up questions and cc the City. Questions and responses submitted in the 21-day period will be included in the proponents report to the Land-use Authority.

There also should be public notification and labeling for small cell antennas. Please refer to:

Creating a Proactive Antenna Siting Protocol & Small Cell Licensing Agreement

https://thecalm.ca/creating-a-proactive-antenna-siting-protocol_-small-cell-licensing-agreement_version-6

***DISCLAIMER:** These suggestions are opinions put forward without the benefit of any legal knowledge or advice and/or professional knowledge about writing policies on this subject. This is not legal or professional advice. Please consult with a licensed attorney or other relevant professional.

ANTENNA SITING POLICIES AND ISED

Does ISED issue a formal license, permit or authorization letter to a proponent to build a cell tower installation? Or is the approval to proceed with a cell tower installation the letter of concurrence from each Land Use Authority (LUA) involved, after all the necessary consultation steps are complete per the relevant protocol?

Local level government, the duly elected officials (“Council”) are responsible for providing a letter of concurrence or non-concurrence to the proponent/ISED for a proposed cell tower application.

ISED “recognizes the need to have a collaborative and consultative policy with respect to antenna-supporting structures” because municipalities are the ones directly impacted by these towers sited in their communities. As a result, ISED procedures “allow municipalities to define their own antenna siting procedures and make informed decisions in regards to providing concurrence for the proposed tower.”

If the LUA submits a letter of concurrence that includes comments about concerns, would ISED have any role in trying to remediate those concerns? Would ISED have any role in questioning the LUA’s decision (to give concurrence or not) for a cell tower application?

If the LUA has concerns relating to the satisfactory completion of the protocol process whether relating to LUA and/or the public consultation, what are all the options available to them? Can they then either submit a letter of non-concurrence, or request the initiation of the ISED dispute resolution process? If only a Stakeholder may request CPC-2-0-03 Dispute Resolution process, what is that defined as? Is the term “Stakeholder” used in CPC-2-0-03 referring to only the proponent or the Council (LUA); not the general public or individuals who may disagree with a Council's decision?

ISED ATTENDED A CVRD EASC MEETING

EASC Meeting Dec 9, 2024

Video <https://www.youtube.com/watch?v=rAowTOq6LUQ>

Agenda Item #3: The Larkin Rd proposed tower starts at the 1:11:23 minute mark of the meeting.

DISCLAIMER The following transcript may not capture all of what was said during the actual meeting. It was created by a local resident and not a professional and as such, it may contain minor typo's. This is intended for educational purposes only, it is not legal advice.

The Directors were expecting a presentation from ISED, to present the report that was noted on the agenda. Instead, 3 ISED representatives attended the meeting, and were available to answer any questions about the 6 page report they had submitted. Their roles or positions within ISED were not identified.

[1:16:15] Director Arbour says: Finally ISED is here but we've been asking for about four years for them to come out but if they're just coming as a resource in the corner, not prepared to present any information on how they make decisions on the health aspects of cell towers and all of those key concerns that keep arising in community again and again, again and again, ah that's I guess, I could formulate, give me a few minutes and I'll formulate questions around that but I'll pass it back to Chair. I was expecting a presentation. Thank you.

[1:17:46] Director Hardy starts speaking. [...] Again, based on the information provided by staff [...] I guess 1 question I would have for ISED is moving forward here again, trying to understand. What's been said is Rogers Communication and SitePath Consulting have satisfactorily consulted with the Comox Valley Regional District and completed the required public consultation process for the proposed telecommunication's tower on the property that's in question here. So, again, I'm just wondering about the required public consultation process. What kind of public consultation did Rogers have with the public regarding the tower other than the one zoom meeting that they had with the public. I guess I would put my question towards the public and I'm not sure how when or how you go about doing that but **would the public consider one zoom meeting with Rogers as wholesome and reasonable consultation the community with regards to the proposed location of the tower.** Thanks. [...]

[1:19:29] Ken (ISED representative) says: [...] we were required to provide a presentation to the Comox Valley Regional District, which we did in Sept 2022 if memory serves me correct. We did a presentation on the consultation process under the active default process and how it is expected to be completed. To my understanding from your staff that Comox has since adopted their own antenna siting policy and staff, your planning staff have assured me that council is fully aware of that process. Um, we **were asked to participate in this meeting for, to be available for any follow up questions in which four questions were provided to us.** And we provide fairly we'd considered pretty **comprehensive responses in a six page document** that has been included in the minutes and they are, have been made as part of the public record. I'm assuming that in advance of this meeting that the members here have read that um and um, and have an opportunity to question us on those questions, so that we can clarify any of the processes. The process is a long and involved process and I don't want to speak on behalf of Heather but what I will say is there is a significant amount of public consultation um required and um it can um occur in as little time as 120 days or longer. Um, and ah any tower that is over 30 meters would be required to have in the local newspaper at least one ah advertisement indicating this proposal. There are mail outs that are sent to the surrounding community members and I think that Heather indicated that within a radius of 500 meters of the tower and that doesn't exclude other members because of the newspaper invites all members of the community to ah respond and then SitePath would respond to each and every one of those persons and provide a response ah to every one of those members for all reasonable and relevant concerns. And um, yeah, that's pretty much, um, that's I think that's pretty much all I have to say unless [...] there are any questions.

[1:22:16] Director Arbour says: Thanks for opening the conversation. I did read your material but some what quickly because I thought that it would be presented and this was also part of a 250 page document, which includes the application and a number of responses received. So my question is, that this almost must be like **a national problem** because with **every one of these applications** that we receive, we typically receive the, you know **90 - 95 % negative response** from people that are nearby these towers or other constituents. So for ISED, what is value if your going to go through these processes and receive all of this negative feedback and then say, well we approve the tower. Is it just because some where in Parliament, somewhere there is a legislated mandate that you need consultation because it seems that a lot of the consultation that happens results in a lot of negative response. So, it's a bit of **a broken consultation process** in my opinion. Both for people that want towers and for those that don't. And for us, the local government, it becomes just what is the use from ISED's perspective in having these consultations processes. And I would highlight page 55 or 56 [145], I forget but even the consultant, who's gone through all of these processes with the public is starting to become combative. In the email responses which are on our agenda, when I read someone, the consultant pushing a resident and saying please give us your address, it will be important to the decision maker to know your address and the person does not necessarily want to give their address. That's almost unprofessional in my opinion. And it shows a level of frustration for the consultant probably dealing with some of those members of the public on a regular basis. So, **what is ISED's view of the consultation process is there intent to reform the consultation process across Canada.** Thanks.

[1:24:28] Ken (ISED representative) says: Thanks for your question, what I can say is default ISED policy is provided as a default to those communities that don't have an antenna siting policy of their own. So **ISED encourages communities to adopt their own policy that is unique and tailors [to] the concerns of their own community.** There is a page that we offer, to sort of help guide land use authority on how to create that as well as I believe there is a partnership with the Federations of Municipalities to provide support on that. Um, so I can't speak to you know it seems like you guys have created your own policy and taken local ah factors into consideration, I haven't read your policy um I mean you can appreciate that there's literally thousands of municipalities out there that have their own policies, so we don't have the manpower to read every one of them but I'm assuming that your policy addresses some of the concerns um that um you think that your community needs to address. Um in terms of the um the **ISED default policy, it's regularly reviewed.** Um it's been recently **updated** um I believe **a year and a half ago approximately to include bilingual requirements [...]** prior to that it was in 2014 when the policy is, prior to the policy being changed there was broad consultation um sent out to communities and you know, through various channels and we look forward to not only municipal input but specifically members of the public. Um, so you know we ... so that's what we offer in terms of providing you know, **living documents that reflects the views of people in terms of giving them an opportunity to consult on what this process should look like.** You know, **there is no one size fits all,** so the default policy is generally really broad. Specifically around how the land use authority consultation process can occur.

[1:26:53] Director Arbour says: Thank you. Yeah, I do have a further question which is, you probably have a sense with working with ISED as to the different as you suggested, the different consultation processes that exist out there and your probably either have your own opinion or there might be an organization's opinion around what seems to have worked better over the years that could be shared. [...] I do have a question as to whether you are **aware of any jurisdictions in Canada that has created it's own different framework for where cell towers could be acceptable from their perspectives.** So, for example, has any community said we just don't want a cell tower with a kilometer of a residence and created a framework around that. Which turns in to a [...] product which kinda of can help the proponents understand where a cell tower could be more palatable.

[1:27:58] Ken (ISED representative) says: Yeah, that's a really great question. And I have had discussions and what I can say is some municipalities will in an effort to help streamline the process um and help um proponents ah wireless carriers to develop coverage um coverage areas and area where you know they could put up a tower. **Some municipalities have zoned areas** that are um you know, ah more applicable I guess to the community and certain areas where you know limited to no complication is required, **so industrial areas for example** I think I've seen some in the past. Or you know, some or most municipalities have some sort of 5 - 10 year, even 15 year community plan where potentially, you know residents could be developed and some communities have been forward thinking, you know these communities are here and we would support infrastructure, including wireless infrastructure in these areas, so it's not uncommon but I would say **it's rare that the municipalities are that forward thinking.** I just can't speak to, to much of that.

[1:29:23] Director Arbour says: I may ask that at a subsequent meeting the regional district perhaps heads that way and be forward thinking. I guess my surprise was when information was shared at a prior meeting on an application that there might be a need for six to ten other towers in the Valley from the perspective of the providers. So, at the time I thought maybe there was a need for one or two towers to service the valley in the long term but that was way off. So then, what that triggered is that sentiment is that are we going to go through these consultation process for the next 8, 9 or 10 times and each time, we are going to have a **huge amount of people that are going to be opposed to it then, what are we supposed to say? We are representing the people and to the people who are involved in the process, well then we would say that the people do not concur with the application right.** So maybe more forward thinking would be to try to **think about what a zoning for tower look like in the rural areas.** One final question because that maybe a harder one sometimes for consultants to answer but is there a reason why a lot of these towers tend to be in rural areas? Like, I don't see a lot of applications in the municipalities and I know most other councils are more amiable to the towers but I'm just curious why it is that it always seems to be in places where people really appreciate, it's almost as if they appreciate the rural lifestyle, they try to get away from society a little bit more than right in town. Is there a reason why we see more applications in rural areas?

[1:31:12] Heather Oliver (SitePath Consulting representative) says: I was assuming this question was for me as the consultant. You know, typically we are asked by the service providers to fill a need. Ah, that's typically based on requests from the community or they've been able to identify ah, you know areas where there is a lack of service. So, ah and it's not that it's just in rural areas we do cell tower sites you know all over, including in cities. Um, and ah you know it's definitely in rural areas that have been under serviced traditionally so it seem that there are you know more applications coming through now but these are identified by either customers or the networking planning team where we can see that there are gaps in service.

[1:32:07] Director Hardy says: Thanks. I guess one of the things I've seen over the past couple of years of being involved with the board and having these conversations revolving around telecommunication towers is again, quite often what I see is that the consulting firm that is working for one of these communication companies comes in and says this will be the new location for the tower it can't be located anywhere else, it has to be on this exact spot. And **what I have not seen over the years is an openness by the telecommunications company's to collaborate with our constituents and to collaborate with the CVRD staff regarding an appropriate place, location of the tower could be.** And again, I go back to Director Arbour's comments or thoughts with regards to if there's going to be another six to eight that need to be put up in the Valley, **let's sit down as a group as a whole and say on a map here's the location that is going to work best for everyone.** Instead of the telecommunication's company coming in and saying here's where the tower is going to be and that's it. What we've also heard over the last couple of years from our constituents is that there is a huge concern around health and safety. Quite often we hear from the telecommunications, here's why we have to put a telecommunication tower up but often also **gets ignored with regards to public health and safety is what are the concerns from the public with regards to the public health and safety when you put one of these towers up around a residential area.** And we've all heard of Heath Canada and their Code 6 and you know, the communications companies saying that, hey you know we are adhering to conditions of Health Canada Health's Code 6 and consequently, we don't want to hear any other issues or concerns regarding the impacts of the tower. However, **it's local government here that is hearing from our**

constituents about the concerns about public health and safety from these towers going up. We also understand that there may be environmental issues that aren't being delved into by ISED. And I guess the concern that I have here is again, from a public health and safety perspective with regards to placement of these towers and the impact upon our constituents and the environment, is that there doesn't seem to be any recognition from ISED on that process. And again, ISED, the primary authority with regards to these towers being put up but we still haven't seen any consultation from Health Canada to our constituents with regards to addressing their concerns about this code 6 and the telecommunications towers. So, I'm just wondering again where ISED is with regards to how they go about addressing concerns of our constituents share with placements of these towers in and around residential areas. Thanks.

[1:35:00] Ken (ISED representative) says: OK, well thank you for the question. What I can say around that um is that ah that **Health Canada sets the standard**, um **they are the health experts**, and I'm not going to profess to be health experts. **What our role is, is to ensure the level set by Health Canada are adhered to at all times and that is a condition of license for the wireless communications providers**. So, any specific questions around health should be directed to health and you know, and then that all I can say to that. We also have and I will say that we have proactive safety code 6 measuring program where we will enter, you know go into the community with very sophisticated um measuring devices, measure the RF spectrum, the electromagnetic field in three dimensions. And we ensure that towers um that are installed are meeting the standard. We've done literally hundreds across the country and in our experience and in our measurements, generally, the levels that we are seeing from cell towers come within 1 - 3% of safety code 6. So they're not even crossing, you know, that's a very very low level. I think the highest one we've ever measured was 5% of safety code 6. And safety code 6, the Health Canada measure, ISED adds, I think a 50 fold increase buffer on top of the Health Canada requirements, recommendations, so we're within 1 - 2% of that, which is very, very small. So, what we can say is that um, wireless service providers are consistently um meeting the Health Canada safety code 6 recommendation um, and meeting it quite significantly so, um, and, **that's our mandate** - is to have, **to make sure that as part of the installations, that Health Canada guideline is um observed**. And to date, we can confirm that, you know, that is happening.

[1:37:20] Director Hardy says: Thanks Chair. And, I guess going back to ISED and understanding what their jurisdiction and what jurisdiction is theirs and what's required with regards to Health Canada. And I get and understand that **ISED is just here to kinda defer any health issues that our constituents may have with regards to the telecommunications tower to Health Canada but yet Health Canada has not been around to provide any presentations or listen to any concerns our constituents have put forward**. So, again, just trying to understand this public consultation process and whether it was completed or not. If we haven't had Health Canada come and give a presentation with regards to their requirements are, regulations etc., and listen to our constituents and their concerns and issues with regards to the telecommunications towers. **Has the public consultation process really been completed** I guess is the question I have here.

[1:38:41] Ken (ISED representative) says: Ah, you know, all I can say to that, I don't, all I can say is that, you know, that the, the, Health Canada level must be met and we find that is met so, um. Otherwise the submission of the license would not be met and that station can no longer operate.

[1:39:10] Director Hardy says: So again, my comment would be with regards to, if I understand correctly, **ISED is the senior authority with regards to the consultation**, regarding the telecommunications towers with the allocation of a license moving forward. And again, there's a whole bunch of different federal and provincial agencies, that I assume that operate, or that have to follow ISED. So again, the question I have is with regards to, if ISED cannot answer the health questions that our constituents have and the concerns that they have here. Then is it not the obligation of ISED to ensure that Health Canada come and have a presentation to our constituents and allow our constituents to have that ability to ask questions with regards to health? And I haven't seen that within the public consultation process that the consultants have had with the constituents of the Comox Valley or with the area of concern here. So, again the question I ask, **if ISED cannot answer the health questions and defers to Health Canada, does not ISED have the obligation to have Health Canada come and address the questions that are being put forward by our constituents and provide the information to our constituents about health code 6 and how that all works?** Thank you.

[1:40:32] Ken (ISED representative) says: Yah, again, **I can't speak to the health questions that are being asked, all I can do is direct them to Health Canada. I can't force Health Canada to respond**. Um, so, um, you know, like I said, our job is to, you know, the mandate that we have is to ensure that Health Canada safety code 6 is met.

[1:41:03] Director Hardy says: And I guess we can continue to go back and forth and this will probably be the last time that I provide my comments to you regarding this but I also look at a **similar bureaucracy institution**, such as the Department of Fisheries and Oceans and quite often the Department of Fisheries and Oceans has other federal agencies that collaborate with them but at the end of the day, when you go and allocate the license, it's based upon - this particular institute and this particular institution, this federal branch and their recommendations and how they fit into this. And like I said, there's a number of concerns that have been put forward to us from our constituents about public health and safety of the telecommunications cell tower. Now, **you've deferred to Health Canada, saying that it's Health Canada that puts forward it's legislation** and how you may or may not be able to operate with regards to your telecommunications tower, where it is located etc. **You're the senior branch here**. You've deferred to Health Canada with regards to answering these questions because you cannot answer those questions. So, when we go back to the language here that's been put forward to us, saying that all public consultation been completed, I don't believe that, in my opinion, **I don't believe that all the public consultation process has occurred because Health Canada hasn't come and given a presentation** to the board or to the area constituents regarding how code 6 operates and then being able to answer questions from our constituents about code 6. So, I don't believe in my opinion that ISED has completed its consultation process that one of the agencies that operates under it hasn't completed its consultation process for their constituents and the board. So, those are just some of my comments, I look forward to your answer in regards to that.

[1:43:03] Ken (ISED representative) says: Um, yeah, I mean, I appreciate your comments, um, you know the policy that we have in place um is, is, is something that we need to make sure is followed. There, there in the policy is, ah that we are ensuring is followed is that there **is no requirement for Health Canada to provide** um, eh a, a **presentation**. But like I said, this is **evolving topic** and if you have constituents that have concerns around that **and you would like to see the policy changed**, there are consultation mechanisms, a like I said, that **we often reach out to municipalities and if that's something you would like to see changed then, you know, I would encourage you to participate in the consultation**. Um but I really, I can't answer that because like I said, we ensure that the policy is being followed. And that's, that's all I can say. I don't create policy, ah in the regional operations we ensure that it is being followed.

[1:44:14] Director Grieve says: Just before Director Hardy has another question, I think that local government, we totally realize the **challenges that senior government have with all of their different ministries operating in silos**, seeing where there's situations where we've got meetings with various ministers and the minister just down a couple of doors down, staff doesn't even know that, the staff from the ministry [...] has never met them. So we do recognize the challenges exist but I would, I mean I don't, in all fairness, I do think that it's a question that can't be answered. Um, except maybe through the ballot box, we all know that at the end of the day, the bureaucrats are supposed to dance to the tune of the political masters, supposed to, so I would say that maybe this is a catch 22, that there's no way out of. But I'll give this back to Director Hardy for one more question.

[1:45:27] Director Hardy says: Thanks Chair. So, again I think that I've put forward to you a gap that I'm seeing right now. And again, that's in regard to ISED being senior authority with regards to allocation of a license, deferring to other federal agencies with regards to any issues and concerns with regards to public health and safety and our constituents being able to ask those questions to a federal agency but yet that federal agency hasn't been available to come and provide a presentation and to listen to concerns of our constituents. So, I see that **this is a huge gap with regards to your policy** and I guess the concern that I have is that, **when is ISED going to review your policy again and make some amendments to it, to it's policy that would allow for this process to occur**. Because, again what I'm hearing again continuously here is that the public consultation has been wholesome and is completed but [in] my opinion, I don't see it as being completed because there's a huge agency that operates under your thumb that isn't here to give a presentation, to listen to concerns and issues that constituents here. So, I know we're far away here with regards to recommendations but I have a real tough time being able to provide a letter of concurrence, saying we're good with this process when we're seeing here, right in front of our eyes here that process isn't being completed. So, anyways, I'll just leave it at that. Thanks.

[1:47:05] Ken (ISED representative) says: Thank you for your question, I will certainly take that information back to my policy advisers.

In the end, a motion was passed to not issue a letter of concurrence for the proposed tower at 1351 Larkin Road.

Minutes:

https://cvr.dagendaminutes.com/oxvalleyrd.ca/Agenda_minutes/CVRDCommittees/EASC/09-Dec-24/z13%2020241203%20Warren%20SR%20PJ%201C%2023%20Green%201351%20Larkin%20Road%20Letter%20of%20Concurrence%20Request.pdf

SUPPORT AND PROTECT OUR FOOD PRODUCING FARMS

The Agricultural Land Commission Act (ALCA)

The Agricultural Land Commission Act (ALC Act) governs the use of agricultural land in BC and takes precedence “over other legislation and bylaws that may apply to the land”, and local and regional governments are expected to operate “in accordance with [this] provincial policy of preserving agricultural land.”

Cell towers are NOT a permitted Non-Farm Use for ALR Land under the Agricultural Land Reserve Use Regulation. The Telecom companies seeking new tower installations have made claims that cell towers are exempt on the advisement of the ALC because reference to telecommunication towers was removed from the ALR regulations in 2019 due to federal jurisdiction in this matter. However, in a court of law, the federal government would need to prove that applicable ALR provincial legislation “impairs federal power” and counter our claim that the impact of the *Radiocommunication Act* impairs the ability of the provincial government to exercise its jurisdictional authority to protect and prioritize agriculture in the ALR, especially given the harms of RF-EMR exposure to pollinators and biodiversity, both crucial to a healthy agricultural sector. We believe the court would find itself in the position of making the unreasonable argument that we need to sacrifice food security and public health for people’s desire for more connectivity.

While Innovation Science and Economic Development (ISED), formally Industry Canada, may have final approval power over the siting of cell towers in Canada, local provincial public officials cannot abdicate their responsibility to uphold and adhere to provincial legislation designed to prioritize and protect farming in the Agricultural Land Reserve (ALR). Section 6 of the ALC Act lays out the purpose of the Agricultural Land Commission

<https://www.alc.gov.bc.ca/application-and-notice-process/applications/what-the-commission-considers/>

Purposes of the Commission

6 (1) The following are the purposes of the commission:

1. **to preserve agricultural land;**

(2) The commission, to fulfill its purposes under subsection (1), must give priority to protecting and enhancing all of the following in exercising its powers and performing its duties under this Act:

- the size, integrity and continuity of the land base of the agricultural land reserve;
- the **use of the agricultural land reserve for farm use.**

Correspondence from both the ISED Operations Manager, STS-Western Region and ISED Minister’s office state that ISED “recognizes the need to have a collaborative and consultative policy with respect to antenna-supporting structures” because municipalities are the ones directly impacted by these towers sited in their communities. As a result, ISED procedures “allow municipalities to define their own antenna siting procedures and make informed decisions in regards to providing concurrence for the proposed tower.” When asked about impacts of RF-EMR to wildlife and the environments, ISED deferred to provincial and municipal authorities, stating “As such, any questions or concerns regarding specific proposed antenna structures and their impact on local wildlife and vegetation, should be directed to your local land-use authority (municipality) and, if applicable, the [Provincial Agricultural Land Commission](#).” This looks like clear confirmation from the federal regulatory authority that the province and municipality have more authority over the siting of towers than we, the public, have been led to believe.

Again, while ISED may have the final approval power, we understand from the experience of other communities that ISED usually does not become involved unless there is a stalemate in this process. A home-grown solution that takes into account the environment and the people who will ultimately be impacted is preferable to one that is decided by an outside entity.

The Comox Valley Agricultural Plan (2002)

Phase 2 states the following purpose: “To further the development of socially, culturally, environmentally and economically sustainable farming.” creates a justification for putting a source of RF-EMF pollution in the ALR. Agricultural land is not only important for food production for human consumption. ALR land, especially land that is not being actively farmed, also provides critical habitat for preserving insect and wildlife biodiversity—and this has benefits for agriculture. For one thing, healthy biodiversity helps maintain the ecological balance that keeps predators and pests in check. Other immeasurable benefits to farmers and ranchers” of biodiversity are listed on <https://www2.gov.bc.ca/gov/content/home>

IMPORTANT FACT: Pollinators and biodiversity are critical to food production and agriculture.

The CVRD’s Telecommunication Antenna System Application and Consultation Process Policy (P89)

This policy was created in response to Dove Creek residents objections to the proposed tower in that area after they first heard about it in 2021. The Board Policy was approved May 24, 2022 and is titled ‘Telecommunication Antenna System Application and Consultation Process Policy’.

https://www.comoxvalleyrd.ca/sites/default/files/docs/p89_telecommunications_antenna_system_policy_20220524.pdf

The CVRD’s Telecommunication Antenna System Application and Consultation Process Policy (P89) states that the CVRD, as the local Land Use Authority, has the power to issue a statement of concurrence or non-concurrence for these proposed cell towers and that this decision is based on 3 considerations: “the land use compatibility of the antenna structure, the responses of the affected residents, and the Proponent’s adherence to [the P89] protocol.”

Section 1 (b) of P89 provides guidance on which locations are discouraged for cell tower siting
... iv. Ecologically important parklands and parklands where migratory and resident birds are known to congregate;
.... ... vi. Agricultural areas, unless the Telecommunication Antenna System and associated land disturbances will not interfere with current or potential agricultural operations and productivity ...; and, vii. Within an area of prime agricultural land as defined by the Agricultural Land Commission (e.g. Soil Class rating)

IMPORTANT FACT: There are migratory and resident birds that frequent the areas of (ALR) land of recently proposed cell tower applications.

HEALTH CANADA SAFETY CODE 6 ISSUES

Health Canada Canada’s Radiofrequency (RF) Electromagnetic Frequencies (EMF) guideline is called Health Canada Safety Code 6 (SC6). It is for humans only and the length of the test was 6 minutes (see table 5)! **Canada does not have ANY RF / EMF safety guidelines for birds, pollinators, animals or the environment! Cell towers emit radiation 24/7.**

SC6 Guidelines were created in the 1990’s – before smart phones and 5G. SC6 was applicable to individuals working at or visiting federally regulated sites. There are no biologists, medical doctors or specialists who are trained in the biological effects on the Health Canada team.

In 2013 Health Canada admits Safety Code 6 guideline for cell tower microwave radiation is based ONLY on thermal effects, before Superior Court of Quebec. Biological effects are NOT considered.

Safety Code 6 (2015) – Power Density

Health Canada / Santé Canada
Your health and safety... our priority. / Votre santé et votre sécurité... notre priorité.

Limits of Human Exposure to Radiofrequency Electromagnetic Energy in the Frequency Range from 3 kHz to 300 GHz

<https://www.canada.ca/en/health-canada/services/publications/health-risks-safety/limits-human-exposure-radiofrequency-electromagnetic-energy-range-3-300.html>

Table 5. Reference Levels for Electric Field Strength, Magnetic Field Strength and Power Density in Uncontrolled Environments

Frequency (MHz)	Electric Field Strength (E _{RL}), (V/m, RMS)	Magnetic Field Strength (H _{RL}), (A/m, RMS)	Power Density (S _{RL}), (W/m ²)	Reference Period (minutes)
10 - 20	27.46	0.0728	2	6
20 - 48	58.07 / f ^{0.25}	0.1540 / f ^{0.25}	8.944 / f ^{0.5}	6
48 - 300	22.06	0.05852	1.291	6
300 - 6000	3.142 f ^{0.3417}	0.008335 f ^{0.3417}	0.02619 f ^{0.6834}	6
5G	61.4	0.163	10	6
15000 - 150000	61.4	0.163	10	616000 / f ^{1.2}
150000 - 300000	0.158 f ^{0.5}	4.21 × 10 ⁻⁴ f ^{0.5}	6.67 × 10 ⁻⁵ f	616000 / f ^{1.2}

Frequency, f, is in MHz.
Doubled in January, 2021 to 20 W/m²
Red and yellow markings added


Based ONLY on “over-heating” of body tissue by no more than 1C within a period of 6 minutes. The assumption is that if it does not over-heat (within 6 minutes), this radiation will not harm.

Credit: Marg Friesen, M.Sc.

SC6 has not had any significant revisions in over 20 years. In 2015 they were 'revised' and the limits doubled for 5G BUT

**January 2021:
Evidence used to support
the “complement” to
Safety Code 6 that doubled
human exposure limits for
5G devices:**

- The only effects on humans relied on were “over-heating” effects and pain sensation. Studies (10) were 30 minutes or less exposure time.
- All animal studies (12) were short term studies and none were considered to be of “high quality.”
- Findings from tissue and cell studies were excluded from the analysis.



Health Canada Santé Canada

4.0 Assessment of potential adverse health effects from exposure to RFEMF at frequencies from 6 to 300 GHz

Consumer & Clinical Radiation Protection Bureau, Health Canada
775 Brookfield Road, Ottawa, ON, Canada, K1A 1C1

Summary of evidence:
Human Studies:
Of the 10 identified studies on human responses to RFEMF in the 6 to 300 GHz frequency band, most have been conducted by two research groups and have focused on skin temperature changes and the threshold of perceived warmth and heat pain sensation. The human studies were identified that assessed endpoints such as cancer, ocular effects, reproductive system effects, cognitive effects, impacts on the immune system, non-specific symptoms or any other adverse health outcomes in response to exposure to RFEMF in the 6-300 GHz frequency band. The included studies on human outcomes are outlined in Table 4.1.

Page 32.

No human studies were identified that assessed endpoints such as cancer, ocular effects, reproductive system effects, impacts on the immune system, non-specific symptoms or any other adverse health outcome

...

Credit: Marg Friesen, M.Sc.

This Health Canada report is only available by request from Health Canada.

Margaret (Marg) Friesen

- Bachelor Science (Honours-Zoology)
- Masters Science (Entomology/Toxicology)
- Over 30 years experience with the federal government and University of Manitoba in original research: cancer research, ecosystem toxicology, DNA population genetics of Arctic marine mammals
- Post retirement, environmental health and electromagnetic radiation = wireless radiation
- Science Advisor/Environmental Health Issues for Canadians for Safe Technology
- Director of the Environmental Health Association of Manitoba



Marg Friesen, M.Sc. was a delegate for the CVRD EASC meeting on Mar 6, 2023 re 1388 Ellenor Road, CVRD Area B Proposed 43 Meter Telus Tower.

How Did Health Canada Determine Wireless Radiation is Safe for all 24-7?

Health Canada (HC) makes a claim that wireless radiation is safe for everyone, 24 hours a day, 7 days a week but the test length was only 6 minutes (table 5). How does that math work? We don't know – see the response we got from a Freedom of Information request:

Original Request for Information: Regarding any studies that HC used to make their Safety Code 6 claim of safety for anyone to continuously be exposed to multiple sources of RF-EMR, including 5G - this includes any studies conducted by Health Canada or by someone else. I am requesting a comprehensive list [including the author(s) name(s), date, study title, journal name where the study was published and a url link] to the references used in those studies.

HC Response: “Having completed a thorough search, we regret to inform you that we were unable to locate any records responsive to your request; no such list exists.” - Office of the Information Commissioner of Canada



Health Canada / Santé Canada
Access to Information and Privacy Division
7th Floor, Suite 700, Holland Cross - Tower B
1600 Scott Street, (Mail Stop: 3107A)
Ottawa, Ontario K1A 0K9

November 16, 2023

[Via Email](#)

Our file: A-2023-000889 / JS3

This is in response to your request made under the *Access to Information Act* (the Act) for the following information:

“ (Regarding any studies that HC used to make their Safety 6 claim of safety for anyone to continuously be exposed to multiple sources of RF-EMR, including 5G - this includes any studies conducted by Health Canada or by someone else) - I am requesting a comprehensive list [including the author(s) name(s), date, study title, journal name where the study was published and a url link] to the references used in those studies. “

Having completed a thorough search, we regret to inform you that we were unable to locate any records responsive to your request; no such list exists.

Yours sincerely,

Steele,
Jill

Jill Steele
Senior Advisor

Canada

“Who’s health is Health Canada protecting?” Dr. Magda Havas

Health Canada acknowledges that two adverse health effects can occur: heat-pain sensation and thermal tissue damage

<https://www.canada.ca/en/health-canada/services/health-risks-safety/radiation/types-sources/radiofrequency-fields/notice-localized-human-exposure-limits-range-6-ghz-300-ghz.html>

Government of Canada / Gouvernement du Canada

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MENU

Canada.ca > Health > Health risks and safety > Radiation and your health > Types and sources of radiation > Radiofrequency electromagnetic fields (EMF)

Notice: Localized human exposure limits for radiofrequency fields in the range of 6 GHz to 300 GHz

January 2021

Conclusions

For localized exposures to radiofrequency EMF in the 6 GHz to 300 GHz frequency range, Health Canada is in agreement with ICNIRP that **two adverse health effects can occur**. These are:

- **heat-pain sensation**
- **thermal tissue damage**

Health Canada is also in agreement with ICNIRP regarding the threshold temperature for the occurrence of these effects.

Based on a number of worst-case assumptions built into Health Canada's computational modeling, Health Canada determined that application of the ICNIRP limits is justified with certain modifications in order to address a wider range of exposure scenarios. These modifications would further restrict maximal localized tissue temperature increases to levels which are below the thresholds for heat-pain sensation or thermal tissue damage.

P. Héroux, *The Collision between Wireless and Biology*, HELIYON, <https://doi.org/10.1016/j.heliyon.2025.e42267>

2025 New Report Contradicts Telecom Industry Claim That Wireless Radiation Is Safe

<https://www.radiationresearch.org/news/new-report-contradicts-telecom-industry-claim-that-wireless-radiation-is-safe/>

A new peer-reviewed scientific report outlines a mechanism by which non-ionizing radiation can disrupt the biology of living systems, even at levels much lower than what's needed to heat tissues. The telecom industry has consistently claimed that non-ionizing radiation is harmless to human health. By [Suzanne Burdick, Ph.D.](#)

The basis for the wireless industry's claim that radiation is safe for humans is scientifically erroneous, according to the author of a new peer-reviewed [scientific report](#). [Paul Héroux, Ph.D.](#), authored the report, which was published Jan. 30 in [Heliyon](#), one of Elsevier's journals on its ScienceDirect platform. Héroux, an associate professor of medicine at McGill University in Montreal, Canada, and a medical scientist in McGill University Health Center's surgery department, has years of experience in physics and electrical engineering. He is also vice chair of the [International Commission on the Biological Effects of Electromagnetic Fields](#) (ICBE-EMF), a "consortium of scientists, doctors and researchers" who study wireless radiation and make recommendations for [wireless radiation exposure](#) guidelines "based on the best peer-reviewed research publications."

Héroux told The Defender: "Industry's most important argument to deny the [health impacts](#) of [electromagnetic radiation](#) has been that these health effects are impossible based on solid physics, specifically that the radiation is 'non-ionizing.'" Héroux detailed the scientific faultiness of that argument: "Ionization by the radiation itself is irrelevant because life processes produce ionization within the body itself. "In fact, the basic laws of physics (Maxwell's Equations and the Second Law of Thermodynamics) together with established biology confirm that [health effects](#) of electromagnetic radiation are in fact inevitable, and at levels much lower than those considered safe by industry."

Continue Reading: [New Report Contradicts Telecom Industry Claim That Wireless Radiation Is Safe](#)

Scientific Studies reporting potential harm below Safety Code 6 (2015)

References of over 200 scientific studies and six (6) reviews reporting **potential harm** at non-thermal (not heating) levels of radiofrequency/microwave radiation that are **below Safety Code 6** (2015) - Canadians for Safe Technology (C4ST)

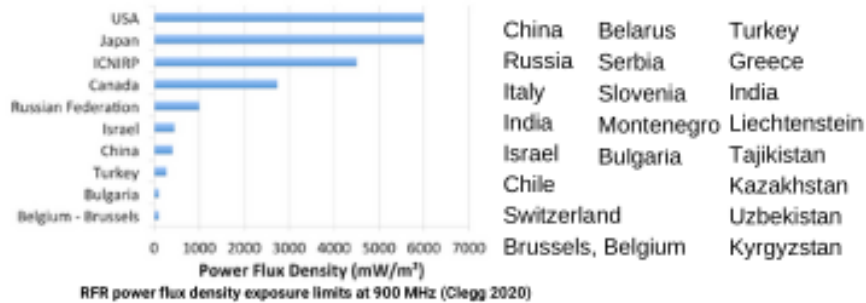
<https://drive.proton.me/urls/AD871044C0#vxkTcpiX8Fw>

https://c4st.org/wp-content/uploads/2017/04/original-references_of_over_200_scientific_studies_showing_potential_harm_at_levels_below_safety_code_6.pdf

How does Canada's Safety Limit Compare with Other Countries?

<https://ehtrust.org/policy/international-policy-actions-on-wireless/>

Numerous Countries Have Cell Tower Network RFR Exposure Limits Far More Stringent Than ICNIRP/FCC (USA):



Numerous countries have cell tower network radiofrequency radiation (RF) limits (maximum permissible limits) 10 to 100 times below ICNIRP and FCC limits or they have policies to reduce exposure near schools and/or homes designated as “sensitive” areas.

Scientific evidence invalidates health assumptions underlying the FCC and ICNIRP exposure limit determinations for radiofrequency radiation: implications for 5G

<https://pubmed.ncbi.nlm.nih.gov/36253855>

<https://ehjournal.biomedcentral.com/articles/10.1186/s12940-022-00900-9>

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Comment | Open access | Published: 18 October 2022

Scientific evidence invalidates health assumptions underlying the FCC and ICNIRP exposure limit determinations for radiofrequency radiation: implications for 5G

International Commission on the Biological Effects of Electromagnetic Fields (ICBE-EMF)

Environmental Health 21, Article number: 92 (2022) | Cite this article

ABSTRACT: In the late-1990s, the FCC and ICNIRP adopted radiofrequency radiation (RFR) exposure limits to protect the public and workers from adverse effects of RFR. These limits were based on results from behavioral studies conducted in the 1980s involving 40–60-minute exposures in 5 monkeys and 8 rats, and then applying arbitrary safety factors to an apparent threshold specific absorption rate (SAR) of 4 W/kg. The limits were also based on two major assumptions: any biological effects were due to excessive tissue heating and no effects would occur below the putative threshold SAR, as well as twelve assumptions that were not specified by either the FCC or ICNIRP. In this paper, we show how the past 25 years of extensive research on RFR demonstrates that the assumptions underlying the FCC's and ICNIRP's exposure limits are invalid and continue to present a public health harm. Adverse effects observed at exposures below the assumed threshold SAR include non-thermal induction of reactive oxygen species, DNA damage, cardiomyopathy, carcinogenicity, sperm damage, and neurological effects, including electromagnetic hypersensitivity. Also, multiple human studies have found statistically significant associations between RFR exposure and increased brain and thyroid cancer risk. Yet, in 2020, and in light of the body of evidence reviewed in this article, the FCC and ICNIRP reaffirmed the same limits that were established in the 1990s. Consequently, these exposure limits, which are based on false suppositions, do not adequately protect workers, children, hypersensitive individuals, and the general population from short-term or long-term RFR exposures. Thus, urgently needed are health protective exposure limits for humans and the environment. These limits must be based on scientific evidence rather than on erroneous assumptions, especially given the increasing worldwide exposures of people and the environment to RFR, including novel forms of radiation from 5G telecommunications for which there are no adequate health effects studies.

House of Commons HESA Committee Meeting

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

<https://www.ourcommons.ca/DocumentViewer/en/40-3/HESA/meeting-12/evidence>

Dr. Magda Havas (Pg 8): "I think what is absolutely essential is that we begin to reduce the current guidelines that we have. Safety Code 6 does not protect the public. We need to have areas where this technology is restricted, and that includes schools and hospitals. We need to have some microwave-free zones, and I think we have to educate health care professionals" [...]

https://publications.gc.ca/collections/collection_2015/parl/x62-1/XC62-1-2-412-58-eng.pdf

Royal Society of Canada Expert Panel: Review of Safety Code 6 (2013): Health Canada's Safety Limits for Exposure to Radiofrequency Fields Spring 2014

https://rsc-src.ca/sites/default/files/SC6_Report_Formatted_1.pdf

See page 120, 10.2 Summary of the Panel's Recommendations

An Expert Panel Report prepared at the request of the Royal Society of Canada for Health Canada April 2, 2014

Before Health Canada Safety Code 6 was revised in 2015, Frank Clegg of Canadians for Safe Technology (former CEO of Microsoft Canada) and others pulled together experts in their field and met at the Royal Society of Canada. One such expert was, Dr. Riina Bray and this is a portion of her testimony:

"Good afternoon. My name is Dr. Riina Bray. I have a degree in chemical engineering and a master's in pharmacology in the area of addictions and toxicology. I studied medicine at the University of Toronto and did a specialty in family practice. I have a master's in health sciences, public health, in family and community medicine.

[...] As a physician who has specialized in the area of environmental health for over 20 years, I am mortified at the lack of accountability regarding radio and microwave radiation use in the everyday lives of Canadians both young and old. I am appalled by the poor, impractical, and unrealistic research done in this area and the lack of proper, relevant investigations that need to be done and have not. There are no longitudinal studies except the one going on right now on people who did not ask to be subjects, who gave no research ethics board consent, and on whom data is not being collected. That is not a study at all. [...] How many people out there are feeling unwell from something they can't touch, see, smell, or taste? We must protect our citizens properly, and we have to be educated in order to do that" - Dr. Riina Bray (Medical Director, Environmental Health Clinic, Women's College Hospital, As an Individual) at the Health Committee

On April 28th, 2015 https://publications.gc.ca/collections/collection_2015/parl/x62-1/XC62-1-2-412-58-eng.pdf

HESA 2015 Recommendations on Radiofrequency Electromagnetic Radiation and the Health of Canadians

On Tuesday June 9th, 2015 the Standing Committee on Health, whose mandate is to study and report on all matters relating to the mandate, management, and operation of Health Canada, **unanimously adopted the final report into their study of Health Canada's Safety Code 6**. During three full days of hearings spread over two months, the **ten MP member panel heard from both sides of the issue including leading scientists and doctors from around the world, Health Canada and the Canadian Wireless Telecommunications Association**. (Full testimony and recaps can be found further down on this page)

On June 17th, 2015, the Chair of the HESA panel MP Ben Lobb read and tabled the below final 12 HESA recommendations into the House of Commons, requesting that the Government table a comprehensive response to the report. As the current Government goes on summer break on June 19th, 2015, followed by the federal election in October, it will be the new Government that is elected that will be responding to this HESA report.

HESA Recommendations

RECOMMENDATION 1

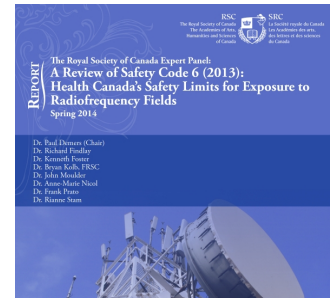
That the Government of Canada, in collaboration with the health departments of the provinces and territories, examine existing cancer data collection methods to improve the collection of information relating to wireless device use and cancer.

RADIOFREQUENCY ELECTROMAGNETIC
RADIATION AND THE HEALTH OF CANADIANS

Report of the Standing Committee
on Health

Ben Lobb
Chair

JUNE 2015
41st PARLIAMENT, SECOND SESSION



RECOMMENDATION 2

That Statistics Canada consider including questions related to electromagnetic hypersensitivity in the Canadian Community Health Survey.

RECOMMENDATION 3

That the Government of Canada, through the Canadian Institutes of Health Research, consider funding research into electromagnetic hypersensitivity testing, diagnosis and treatment, and its possible impacts on health in the workplace.

RECOMMENDATION 4

That the Canadian Medical Association, the Royal College of Physicians and Surgeons, the College of Family Physicians of Canada and the World Health Organization consider updating their guidelines and continuing education materials regarding the diagnosis and treatment of electromagnetic hypersensitivity to ensure they are based on the latest scientific evidence and reflect the symptoms of affected Canadians.

RECOMMENDATION 5

That the Government of Canada continue to provide reasonable accommodations for environmental sensitivities, including electromagnetic hypersensitivity, as required under the *Canadian Human Rights Act*.

RECOMMENDATION 6

That Health Canada ensure the openness and transparency of its processes for the review of Safety Code 6, so that all Canadians have an opportunity to be informed about the evidence considered or excluded in such reviews, that outside experts are provided full information when doing independent reviews, and that the scientific rationale for any change is clearly communicated.

RECOMMENDATION 7

That the Government of Canada establish a system for Canadians to report potential adverse reactions to radiofrequency fields.

RECOMMENDATION 8

That an independent scientific body recognized by Health Canada examine whether measures taken and guidelines provided in other countries, such as France and Israel, to limit the exposure of vulnerable populations, including infants, and young children in the school environment, to radiofrequencies should be adopted in Canada.

RECOMMENDATION 9

That the Government of Canada develop an awareness campaign relating to the safe use of wireless technologies, such as cell phones and Wi-Fi, in key environments such as the school and home to ensure that Canadian families and children are reducing risks related to radiofrequency exposure.

RECOMMENDATION 10

That Health Canada conduct a comprehensive review of all existing literature relating to radiofrequency fields and carcinogenicity based on international best practices.

RECOMMENDATION 11

That the Government of Canada, through the Canadian Institutes of Health Research, consider funding research into the link between radiofrequency fields and potential health effects such as cancer, genetic damage, infertility, impairment to development and behaviour, harmful effects to eyes and on the brain, cardiovascular, biological and biochemical effects.

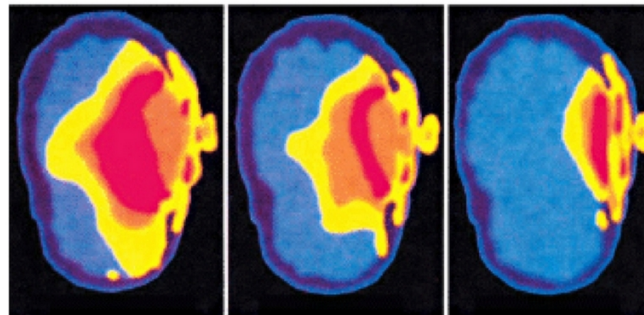
RECOMMENDATION 12

That the Government of Canada and manufacturers consider policy measures regarding the marketing of radiation emitting devices to children under the age of 14, in order to ensure they are aware of the health risks and how they can be avoided.

HOW ARE CELL PHONES TESTED FOR SAFETY?

SAR (specific absorption rate) i.e. does it heat the tissue. SAR is the safety limits used for cell phones and it was based on 'SAM' - a standard 6 foot adult male. **They measure cell phones safety by filling a plastic head with a saline solution and test the phone inches away from the head** for a total of 6 minutes. If the temperature of the 'tissue' (saline solution) is not increased, then it's considered 'safe'. 'What about children? They are not little adults.' - Magda Havas, PhD

Microwave Cellphone Effects Absorption in the Brain According to Age



5 Year Old 10 Year Old Adult
Image courtesy of Dr. Om Gandhi, University of Utah, 1996, IEE Publication

Are your symptoms caused by your wireless devices?

Common Symptoms of Microwave Sickness/Electro-Sensitivity

<p>Brain Headaches Insomnia/Sleep Problems Dizziness Difficulty Concentrating Memory Problems Brain Fog Fatigue</p>		<p>Heart Palpitations Arrhythmia Chest Pain/Pressure Difficulty Breathing Low/High Blood Pressure</p>
<p>Ears Tinnitus Humming Sharp Pain Noise Sensitivity</p>		<p>Mood Irritability Depression</p>
<p>Skin Skin Rash Itching Burning Facial Flushing</p>		<p>Other Adrenal Problems Digestive Problems Weight Loss/Gain Tingling Dehydration Hair Loss Flu Like Symptoms</p>
<p>Eye Pressure In/Behind Eyes Eye Twitching Deteriorating Vision Vision Disturbances Cataract</p>	<p>Children are more susceptible to biological effects from wireless radio frequency radiation</p>	<p>Longterm Cancer ADD/ADHD Autism Alzheimer's Oxidative Stress DNA Damage</p>

Contact Cece Doucette, MA4SafeTech@gmail.com

Please also see 'PHONE GATE CANADA' under section 'Legal Cases' within this document for more information about a current Canadian Class Action Lawsuit. The reason: The way cell phones are tested and the way cell phones are used are not the same and adequate warnings may not have been provided.

ISED THE REGULATOR AND THE BENEFICIARY - CONFLICT OF INTEREST?

ISED: Innovation, Science and Economic Development Canada (formally Industry Canada) is a department of the Government of Canada. ISED is responsible for a number of the federal government's functions in regulating industry and commerce, promoting science and innovation, and supporting economic development. The department was known as Industry Canada prior to 2015. [Wikipedia](#)

Another section of the radiofrequency spectrum was just auctioned off by ISED resulting in 4099 licenses sold for \$2,157,696,532

<https://ised-isde.canada.ca/site/spectrum-management-telecommunications/en/spectrum-allocation/auction-spectrum-licences-3800-mhz-band>

3800 MHz auction - Process and results

"The 3800 MHz auction is a key milestone in the Government of Canada's plan to encourage competition for wireless services, improve rural connectivity and ensure the effective deployment of 5G technologies. The increased number of connections and data-intensive applications expected with 5G will require large amounts of spectrum in a variety of frequency bands. In Canada, the 3800 MHz band has historically been used to provide fixed wireless Internet services, but in the past few years, it has been globally recognized as key for 5G networks because it provides both coverage and capacity for a wide array of new applications, as well as for rural connectivity.

Applicants	22
Number of Rounds	98
Licences won	4099
Final Price (\$)	2,157,696,532

ISED is the regulator and also receives billions of dollars from the Telecom Industry.

LIABILITY AND INSURANCE

Reasonable Questions from Concerned Residents

- Have landowners or the CVRD been **properly informed of the potential liability risk**?
- Does the (relevant) landowner or the CVRD have **insurance coverage without RF / EMR exclusions**?
- Where's the evidence showing that this wireless technology has been proven safe? (Independent studies, not industry funded.)
- Has an **Environmental Impact Assessment** been completed by an independent, qualified professional for the various areas of the proposed towers in the CVRD?
- Will any **measurements** of any kind be taken to assess the health and well being of the **people living in the area before the installation or after? If not, why not?** If there are **sensitive wildlife areas** in the vicinity, **how are they to be protected and monitored?**
- **Who is liable** if people, wildlife or the environment are harmed?

Limiting Liability with Positioning to Minimize Negative Health Effects of Cellular Phone Towers

<https://doi.org/10.1016/j.envres.2019.108845>

ABSTRACT: The use of cellular phones is now ubiquitous through most of the world and the basic operation of cellular phone networks demands widespread human exposure to radio-frequency radiation (RFR). Wireless data needs are increasing due to the major shift in the source of Internet use from personal computers to smart phones. Thus, both the density of cellular phone base stations and their power output is expected to increase the global human RFR exposure. Although direct causation of negative human health effects from RFR from cellular phone base stations has not been finalized, **there is already enough medical and scientific evidence to warrant long-term liability concerns for companies deploying cellular phone towers.** In order to protect cell phone tower firms from the ramifications of the failed paths of other industries that have caused unintended human harm (e.g. tobacco) this article summarizes the peer-reviewed literature on the effects of RFR from cellular phone base stations. Specifically the **impacts of siting base stations are closely examined and recommendations are made for companies that deploy them to minimize their potential future liability.**

[...] This precautionary approach is gaining favor in Europe, but is less common in the U.S. American companies are therefore ill advised to simply follow "regulatory compliance" on this front, as there appears to be a clear cause for concern in the scientific/medical communities. **If causation were to be proven through detailed studies, cellular phone companies would potentially be in position of future legal exposure for causing widespread human health problems and premature death.** It is, therefore, in American companies' best interest to act before government and regulation catches up with the science.

ROGERS Warns Their Shareholders of the Potential Risk of RF but did they Warn Consumers?

We have asked ROGERS + TELUS to provide proof of insurance without Radio Frequency exclusions - to date, they have not.

Here's the wording from their own reports available online, we have highlighted the word radio frequency.

ROGERS Corporation Reports



<https://investors.rogers.com/2022-annual-report/>

Rogers Communications Inc. Rogers 2022 Annual Report

Posted to SEDAR; Rogers Communications Inc. Mar 9 2023 18:25:25 ET Annual report – English PDF 8492K

Quote Heading Page 66

“REGULATORY RISKS”

Quote from Page 67

“Radio frequency emissions

From time to time, media and other reports have highlighted alleged links between **radio frequency** emissions from wireless devices (including new 5G technology) and various health concerns, including cancer, and interference with various medical devices, including hearing aids and pacemakers. This may discourage the use of wireless devices or expose us to potential litigation even though there are no definitive reports or studies stating that these health issues are directly attributable to **radio frequency** emissions. Future regulatory actions may result in more restrictive standards on **radio frequency** emissions from low-powered devices like wireless devices. We cannot predict the nature or extent of any restrictions.

Rogers Communications Inc. Management’s Discussion and Analysis 2022 ANNUAL REPORT ROGERS COMMUNICATIONS INC.

Posted to SEDAR; Rogers Communications Inc. Mar 9 2023 18:19:11 ET MD&A - English PDF 965K

Quote Heading from Page 66

“REGULATORY RISKS”

Quote from Page 67

“Radio frequency emissions

From time to time, media and other reports have highlighted alleged links between **radio frequency** emissions from wireless devices (including new 5G technology) and various health concerns, including cancer, and interference with various medical devices, including hearing aids and pacemakers. This may discourage the use of wireless devices or expose us to potential litigation even though there are no definitive reports or studies stating that these health issues are directly attributable to **radio frequency** emissions. Future regulatory actions may result in more restrictive standards on radio frequency emissions from low-powered devices like wireless devices. We cannot predict the nature or extent of any restrictions.

TELUS Corporation Reports



TELUS Corporation – Annual Information Form for the year ended December 31, 2022 February 9, 2023

Posted to SEDAR; TELUS Corporation Feb 9 2023 07:00:40 ET Annual information form – English PDF 598K

Quote Heading Page 2

“1. CAUTION REGARDING FORWARD-LOOKING STATEMENTS”

Quote from Page 4

- “Environment, health and safety including: loss of employee work time as a result of illness or injury; public concerns related to **radio frequency** emissions; environmental issues including climate-related risks (such as extreme weather events and other natural hazards), waste and waste recycling, risks relating to fuel systems on our properties, changing government and public expectations regarding environmental matters and our responses; ...”

TELUS 2022 Annual Report

Posted to SEDAR; TELUS Corporation Mar 31 2023 17:25:41 ET Annual report – English PDF 13295K

Quote Heading Page 40

“Management’s discussion and analysis Caution regarding forward-looking statements”

Quote Page 41

- “**Environment, health and safety** including: loss of employee work time as a result of illness or injury; public concerns related to **radio frequency** emissions; environmental issues including climate-related risks (such as extreme weather events and other natural hazards), waste and waste recycling, risks relating to fuel systems on our properties, changing government and public expectations regarding environmental matters and our responses; ...”

Quote Heading Page 123 **“10.7 Our environment Risk category:”**

Quote Heading Page 124 **“Changes over the past 12 months”**

Quote 2nd paragraph

“Potential impacts associated with low levels of non-ionizing **radio frequency** (RF) emissions from mobile phones and cell towers continue to be a matter of public concern, and will remain a public concern as we deploy 5G technology, with the number of small cells in our infrastructure expected to increase as we continue to upgrade our network.”

TELUS Corporation – Management’s discussion and analysis – 2022

Posted to SEDAR; TELUS Corporation Feb 9 2023 07:01:16 ET MD&A - English PDF 2688K

Heading Page 2 **“Caution regarding forward-looking statements”**

Quote from Page 4

- “Environment, health and safety including: loss of employee work time as a result of illness or injury; public concerns related to **radio frequency** emissions; environmental issues including climate-related risks (such as extreme weather events and other natural hazards), waste and waste recycling, risks relating to fuel systems on our properties, changing government and public expectations regarding environmental matters and our responses; ...”

Quote Heading Page 103 **“10.7 Our environment Risk category:”**

Quote Heading Page 104 **“Changes over the past 12 months”**

Quote 2nd paragraph

“Potential impacts associated with low levels of non-ionizing **radio frequency** (RF) emissions from mobile phones and cell towers continue to be a matter of public concern, and will remain a public concern as we deploy 5G technology, with the number of small cells in our infrastructure expected to increase as we continue to upgrade our network.”

POTENTIAL HEALTH RISKS – INDEPENDENT SCIENCE

Evidence for a health risk by RF on humans living around mobile phone base stations: From radiofrequency sickness to cancer

<https://pubmed.ncbi.nlm.nih.gov/35843283/>

<https://www.sciencedirect.com/science/article/abs/pii/S0013935122011781?via%3Di%3Dhub>

Excerpt: In the current circumstances, it seems that the **scientific experts in the field are very clear about the serious problems** we are facing and have **expressed this through important appeals** (Blank et al., 2015; Hardell and Nyberg, 2020). However, the **media, the responsible organizations (World Health Organization, 2015) and the governments are not transmitting this crucial information to the population, who remain uninformed**. For these reasons, the current situation **will probably end in a crisis ...**

Peer Reviewed Published Research on Cell Tower Radiation, Base Station Radiation and Health Effects

<https://ehtrust.org/cell-towers-and-cell-antennae/compilation-of-research-studies-on-cell-tower-radiation-and-health/>

Three studies reporting adverse effects on humans from exposure to 5G antenna emissions:

1. Hardell, L., & Nilsson, M. (2023a). **Case Report: A 52-Year Healthy Woman Developed Severe Microwave Syndrome Shortly After Installation of A 5g Base Station Close to Her Apartment**. Annals of Clinical and Medical Case Reports, 10(16), 1–10.

ABSTRACT: In this case report we present a woman aged 52 years who developed health problems consistent with the microwave syndrome after installation of a 5G base station facing her apartment at 60 meters' distance. These symptoms consisted of e.g., headache, dizziness, concentration difficulties, fatigue, arrhythmia, skin burning and nose bleeding corresponding to the microwave syndrome. High radiofrequency (RF) radiation levels were measured in her apartment especially in the part closest to the base station. In her living room at the window 17 500 to 758 000 $\mu\text{W}/\text{m}^2$ peak levels were obtained during 10 measurements, each over 1 minute. At the place of her sofa in her living room peak levels from 36 800 to 222 000 $\mu\text{W}/\text{m}^2$ were measured. It is noteworthy that very high radiation was found at the balcony facing the base station. All ten measurements at that place yielded within 10-15 seconds peak levels $>2\,500\,000\ \mu\text{W}/\text{m}^2$, which is the highest measurable level with the meter used in this study. At the playground about 40 meters from the base station peak levels of 1 120 000 $\mu\text{W}/\text{m}^2$ and 479 000 $\mu\text{W}/\text{m}^2$ were measured, respectively. After temporally leaving the apartment for another dwelling with much lower RF radiation, 96 to 2 810 $\mu\text{W}/\text{m}^2$ peak levels, almost all symptoms disappeared within a short time. After moving back to her own apartment the symptoms reappeared. This study is in line with the results of our two previous case studies showing that installation of 5G caused an extreme increase in exposure and rapid development of the microwave syndrome. These case studies indicate that implementation of 5G cannot be done without the risk of harmful effects on human health.

<https://acmcasereport.com/pdf/ACMCR-v10-1926.pdf>

2. Hardell, L., & Nilsson, M. (2023b). **Case Report: The Microwave Syndrome after Installation of 5G Emphasizes the Need for Protection from Radiofrequency Radiation**. Ann Case Rep, an Open Access Journal ISSN: 2574-77541 Volume 8; Issue 1, 8(1).

ABSTRACT: In this case, report two previously healthy persons, a man aged 63 years and a woman aged 62 years, developed symptoms of the microwave syndrome after installation of a 5G base station for wireless communication on the roof above their apartment. A base station for previous telecommunication generation technology (3G/4G) was present at the same spot since several years. Very high radiofrequency (RF) radiation with maximum (highest measured peak value) levels of 354 000, 1 690 000, and $>2\,500\,000\ \mu\text{W}/\text{m}^2$ were measured at three occasions in the bedroom located only 5 meters below the new 5G base station, compared to maximum (peak) 9 000 $\mu\text{W}/\text{m}^2$ prior to the 5G deployment. The rapidly emerging symptoms after the 5G deployment were typical for the microwave syndrome with e.g., neurological symptoms, tinnitus, fatigue, insomnia, emotional distress, skin disorders, and blood pressure variability. The symptoms were more pronounced in the woman. Due to the severity of symptoms, the couple left their dwelling and moved to a small office room with maximum (peak) RF radiation 3 500 $\mu\text{W}/\text{m}^2$. Within a couple of days, most of their symptoms alleviated or disappeared completely. This medical history can be regarded as a classic provocation test. The RF radiation levels in the apartment were well below the limit proposed to be "safe" below which no health effects would occur, recommended by the International Commission on Non-ionizing Radiation (ICNIRP). These now presented symptoms of the microwave syndrome were caused by non-thermal effects from RF radiation and highlight that the ICNIRP guidelines used in most countries including Sweden do not protect human health. Guidelines based on all biological negative effects from RF radiation are urgently needed, as well as monitoring human health, not the least due to rapidly increasing levels of exposure.

https://www.gavinpublishers.com/assets/articles_pdf/Case-Report-The-Microwave-Syndrome-after-Installation-of-5G-Emphasizes-the-Need-for-Protection-from-Radiofrequency-Radiation.pdf

3. Nilsson M. & Hardell L. (2023). **Development of the Microwave Syndrome in Two Men Shortly after Installation of 5G on the Roof above their Office.** Annals of Clinical Case Reports, 8, 1–6.

ABSTRACT: The 5th generation, 5G, for wireless communication is rolled out without previous studies on potential effects on human health and the environment. In this case study we describe two men, case 1 and case 2, working in three office rooms close to base stations. After the deployment of 5G, both men developed symptoms typical for the microwave syndrome, e.g., headache, tinnitus, dizziness, balance disorder, concentration and attention deficiency, and fatigue. Radiofrequency Radiation (RFR) after the 5G deployment was measured in the three offices. In office one maximum (peak) RFR during one minute varied from 463 to 1,180,000 $\mu\text{W}/\text{m}^2$, in office two from 6,230 to 501,000 and in office three from 13,700 to 613,000 $\mu\text{W}/\text{m}^2$. The symptoms disappeared in both men within a couple of weeks (case 1) or immediately (case 2) after leaving the office for other offices with much lower maximum peak RFR emissions, maximum for case 1 =16 and for case 2 =2,920 $\mu\text{W}/\text{m}^2$. This case report may be regarded as a provocation study on health from 5G RFR. The clinical picture in both men was clearly related to the exposure, although the exposures were well below the guidelines recommended by ICNIRP that are claimed to protect against all health effects. We conclude that the guidelines for RFR exposure based only on tissue heating by ICNIRP are inadequate to protect human health and that 5G appears to provoke symptoms of microwave syndrome in previously healthy people.

https://www.anncaserep.com/open-access/development-of-the-microwave-syndrome-in-two-men-shortly-after-9589.pdf?_cf_chl_tk=75mWvXmZKdxPnIHlehvOMJYD1X3Plj.CWW6VbDuMVe4-1676610128-0-gaNycGzNCdA

INDUSTRY STANDARDS INCLUDE EXCLUSIONS FOR RADIO FREQUENCY (RF) EMISSIONS

Corporate Investor Warnings

<https://ehtrust.org/key-issues/corporate-company-investor-warnings-annual-reports-10k-filings-cell-phone-radiation-risks/>

“If radio frequency emissions from wireless handsets or equipment on our communications infrastructure are demonstrated to cause negative health effects, potential future claims could adversely affect our operations, costs or revenues. The potential connection between radio frequency emissions and certain negative health effects, including some forms of cancer, has been the subject of substantial study by the scientific community in recent years. We cannot guarantee that claims relating to radio frequency emissions will not arise in the future or that the results of such studies will not be adverse to us. Public perception of possible health risks associated with cellular or other wireless connectivity services may slow or diminish the growth of wireless companies, which may in turn slow or diminish our growth. In particular, negative public perception of, and regulations regarding, these perceived health risks may slow or diminish the market acceptance of wireless services. If a connection between radio frequency emissions and possible negative health effects were established, our operations, costs, or revenues may be materially and adversely affected. We currently do not maintain any significant insurance with respect to these matters.”

Electromagnetic Field Insurance Policy Exclusion Are The Standard

<https://ehtrust.org/key-issues/electromagnetic-field-insurance-policy-exclusions/>

- **Insurers rank 5G and electromagnetic radiation** as a **“high” risk**, comparing the issue to lead and [asbestos](#). A 2019 Report by [Swiss Re Institute](#), a world leading provider of insurance,⁴² classifies 5G mobile networks as a “high”, “off-the-leash” risk stating, “Existing concerns regarding potential negative health effects from electromagnetic fields (EMF) are only likely to increase. An uptick in liability claims could be a potential long-term consequence” and “[a]s the biological effects of EMF in general and 5G in particular are still being debated, potential claims for health impairments may come with a long latency.”
- Due to their understanding of the magnitude of this future financial risk most [insurance plans](#) have “electromagnetic field exclusions” applied as the [market standard](#).⁴⁰ [Portland Oregon Public School Insurance](#)⁴¹ (Pg 30) states as an example, **“Exclusions: This insurance does not apply to: Bodily injury, personal injury, advertising injury, or property damage arising directly or indirectly out of, resulting from, caused or contributed to by electromagnetic radiation, provided that such loss, cost or expense results from or is contributed to by the hazardous properties of electromagnetic radiation.”**
- US Mobile operators have been [unable to get insurance](#) to cover liabilities related to damages from long term exposure to radiofrequency emissions for over a decade.

Telecom Insurance Companies Warn of Liability Risks with EMF's to their shareholders but not the public!

<https://ehtrust.org/key-issues/cell-phoneswireless/telecom-insurance-companies-warn-liability-risk-go-key-issues/>

Swiss Re said **5G, along with its potential, presents plenty of added risks ranging from new health concerns to cyber exposure worries and political risks.”** [Beware of All the Added Risks That 5G Mobile Networks Will Bring: Swiss Re, Carrier Management, 2019](#)

<https://ehtrust.org/wireless-companies-warn-shareholders-but-not-people-emfs-are-not-insurable/>

A list of Annual Reports by telecommunication companies clearly **shows how companies warn their shareholders but not residents living near cell antennas.** [Read more here.](#)

Lloyds Insurance does not cover health damage caused by electromagnetic radiation

<https://www.irseco.com/lloyds-insurance-company-does-not-cover-health-damage-caused-by-electromagnetic-radiation/>

The Lloyd's of London and its underwriter CFC Underwriting Limited **exclude** any liability coverage for claims, "directly or indirectly arising out of, **resulting from or contributed to by electromagnetic fields, electromagnetic radiation, electromagnetism, radio waves or noise.**" (Exclusion 32, page 7) See the full PDF document: [INSURANCE FOR ARCHITECTS & ENGINEERS – ProSurance TM A&E Policy Document – Lloyd's 2015](#) Another of the world's largest insurance companies, [Swiss Re](#), has recommended to other insurance companies to write in **exclusion clauses** against paying compensation **for illnesses caused by continuous long-term non-ionising radiation exposure.** The recent Austrian insurance company [AUVA report](#) confirms DNA-breaks caused by non-ionising radiation.

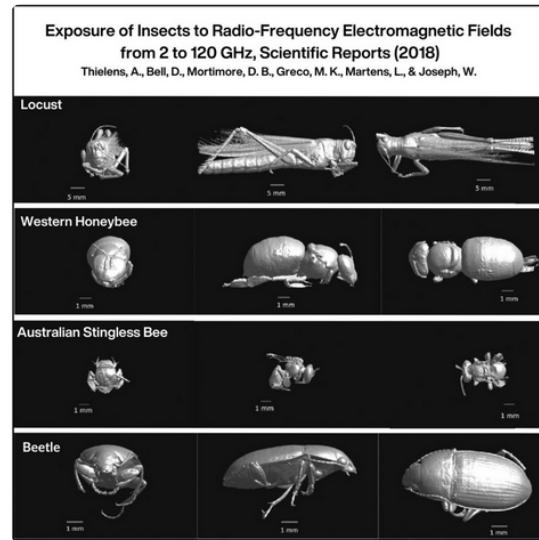
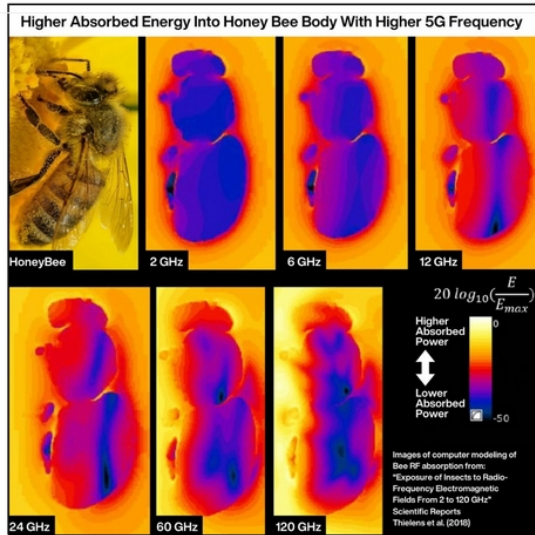
HAVE CELL TOWERS AND WIRELESS RADIATION BEEN PROVEN SAFE FOR WILDLIFE?

Have cell towers and wireless radiation been proven safe for bees, birds and trees? Sadly, the answer is **NO!** Believe it or not, there is reason for concern. Radiofrequency radiation (RFR) from cell towers has not been proven safe for people, animals, birds, insects, and trees. Birds and bats can also have collisions with towers, which can prove deadly. While researchers used to think that the non- ionizing RFR emitted by cell antennas and wireless devices was too weak to cause harmful biological effects, **we now have ample evidence linking low intensity cumulative RFR exposure to DNA damage, cancer & tumours, mitochondrial damage, lowered sperm count and infertility, miscarriages, sleep disorders, memory and cognitive problems, headaches, migraines, damage to the blood-brain barrier, tinnitus, diabetes, heart palpitations, neurological disorders, and more.**

Safety can no longer be assumed. Let's learn from the examples of cigarette smoking, asbestos, DDT, lead, mercury, thalidomide, and other harmful agents that were presumed safe — until they weren't.



EVIDENCE OF WIRELESS HARM TO POLLINATORS AND INSECTS



<https://www.nature.com/articles/s41598-018-22271-3>

<https://ieeexplore.ieee.org/document/10269454>

The [2018 study on honeybees](#) was groundbreaking as it was the first to consider the amount of power absorbed into insects from 5G frequencies. In fact, the study investigated 4 insects: the Australian Stingless Bee, the Western Honeybee, the Beetle, and Locust.

In all four insects, they found the same pattern; as the frequencies increased to the resonant frequency for the insect, the absorbed power significantly increased between 3% to 370%. The researchers concluded, “This could lead to changes in insect behavior, physiology, and morphology over time.

The researchers then [investigated honeybees over the lifecycle](#), including models of worker bees, a drone, a larva, and a queen. The simulations were combined with real-world environments near beehives in Belgium. They found a relatively small shift of 10% of environmental incident power density to frequencies higher than 3 GHz would lead to an increase of this absorption between 390–570%. Many 5G networks will use these higher frequencies.

In 2023, scientists [found](#) “sharp” increases of wireless into a bee’s brain and vital organs from specific frequencies. They conclude their study stating that the exposure could “cause a violation” of important functions such as orientation, communication and sensing.

WILDLIFE AND WIRELESS

<https://www.wildlifeandwireless.org/>

Preserve Nature from the Invisible Reality

As stewards of Earth, we are confronted with an **unseen exposure**, one that disproportionately affects our most vulnerable pollinators and wildlife. **Wireless radiation** and **EMFs** (Electromagnetic Fields) have emerged as a new form of environmental pollution, and their levels continue to rise **unchecked**.

...of Electromagnetic Pollution Endangering Our Wildlife & Ecosystems

Scientific research shows harmful impacts on animals and their habitat. Despite the clear and **mounting scientific evidence**, there are **zero regulations** in place to safeguard our ecosystems. Our current regulatory frameworks are human-centric, prioritizing people above wildlife and the natural world.

<https://www.wildlifeandwireless.org/list-of-scientific-studies>
<https://www.wildlifeandwireless.org/resources/#key-studies>

The Published Science on Environmental Impacts

- [Key Reviews on Impacts to Flora and Fauna](#)
- [Birds](#)
- [Insects](#)
- [Plants and Trees](#)
- [Amphibians](#)
- [Marine](#)
- [Mammals](#)

The delicate balance of our Earth's biodiversity is at stake, threatened by the proliferation of **cell towers** and **wireless technologies**. Solutions exist for safer technology, but they are being ignored.



Wildlife and Wireless: Compendium of Peer Reviewed Research

"There is enough evidence to indicate we may be damaging non-human species at ecosystem and biosphere levels across all taxa from rising background levels of anthropogenic non-ionizing EMF from 0Hz to 300 GHz..."

-Levitt, Lai, and Manville (2022), [Low-level EMF effects on wildlife and plants: What research tells us about an ecosystem approach.](#)

Science: Harmful Impacts to Bees

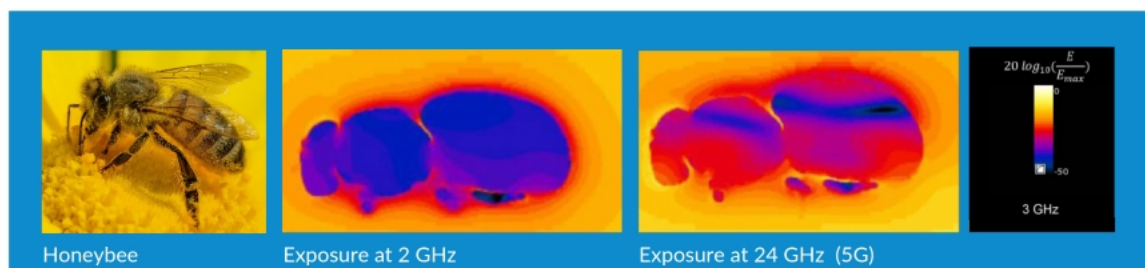
ehtrust.org | wildlifeandwireless.org

SCIENCE: HARMFUL IMPACTS TO BEES

Higher EMF levels are associated with decreased diversity and abundance of insects. While studies are ongoing, a significant body of peer reviewed scientific research from around the world has documented adverse impacts to:

- 
- 1 Colony Strength
 - 2 Immune System
 - 3 Behavior
 - 4 Homing Ability (ability to come home)
 - 5 Physiology
 - 6 Reproduction & Fertility
 - 7 Queen Bee Egg Laying
 - 8 Orientation

Research Finds Higher Exposures into Insects From 5G's Higher Wireless Frequencies Even When the Power Remains The Same



Lighter colors represent higher exposures. Images are from wireless frequency exposure simulations in the published study "Exposure of Insects to Radio-Frequency Electromagnetic Fields from 2 to 120 GHz" published in Scientific Reports by Thielens et al. (2018).

“Our study provides conclusive evidence of detrimental impacts of EMF on honeybee’s pollination behavior, leading to negative effects on plant community.”
— Molina-Montenegro et al. in the study “Electromagnetic fields disrupt the pollination service by honeybees” published in *Science Advances* (2023)

Higher Frequency = Higher Exposures to Insects

New technologies such as 5G will run on higher frequencies from 24 to 40 GHz. Published studies have found that exposure to the higher frequencies of 5G and new networks will result in significantly higher RF absorption into the bodies of bees and insects. The higher frequency EMF waves resonate with the smaller size of the insect to increase exposures, even when the power levels are the same.

“The 5G expansion is leading to a significant increase in EMF emissions... Based on an assessment of the overall study situation on insects, **we must warn against a careless deployment of further mobile telephony infrastructure, as harmful effects on insect populations would be likely...**” —Alain Thill, Marie-Claire Cammaerts and Alfonso Balmori
[Biological effects of electromagnetic fields on insects: a systematic review and meta-analysis](#)

“**The wildlife diversity significantly reduced with increasing EMR strengths**, especially in areas (<12 km from phone mast) with greater than $250 \pm 20 \mu\text{A/m}$ EMR levels. We suggest that deployment of wireless telecommunication infrastructure should take into account EMR levels, safe zones and avoid or minimize biological loss in hotspots.”
—Vincent Raphael Nyirenda, Ngawo Namukonde, Esther Buumba Lungu, Sande Mulwanda, Kenneth Kalezu, Matamy Simwanda, Darius Phiri, Chansa Chomba, Josephat Kalezhi & Chisala Abbie Lwali 2022
[Effects of phone mast-generated electromagnetic radiation gradient on the distribution of terrestrial birds and insects in a savanna protected area](#)

“**Measures are needed to protect public health and the environment.** Plants and animals, in fact, are affected by the chronic exposure to radiofrequency, with **significant damages mostly to birds and bees populations.**”
- [Appeal of Scientists for Electromagnetic Safety](#) sent to the Italian Parliament signed by 50 eminent EMF scientists, researchers and scholars 2023

“EMF exposure exerted strong physiological stress on honeybees as shown by the enhanced expression of heat-shock proteins and genes involved in antioxidant activity and affected the expression levels of behavior-related genes...Our study provides conclusive evidence of detrimental impacts of EMF on honeybee’s pollination behavior, leading to negative effects on plant community.” —Molina-Montenegro MA, Acuña-Rodríguez IS, Ballesteros GI, Baldelomar M, Torres-Díaz C, Broitman BR, Vázquez DP. [Electromagnetic fields disrupt the pollination service by honeybees](#) *Scientific Advances* 2023

“**Statistical analyses demonstrated that the electromagnetic radiation from cellphone towers is harmful to trees...**This constitutes a danger for trees worldwide.” —Waldmann-Selsam, C., Balmori-de la Puente, A., Breunig, H., & Balmori, A.
[Radiofrequency radiation injures trees around mobile phone base stations](#)
Science of The Total Environment 2016

WIRELESS ENVIRO IMPACTS

<https://wirelessenviroimpacts.science>

Canada’s best website with the scientific studies on environmental impacts of wireless radiation (e.g., from cell tower antennas) on wildlife, including birds, bees and trees. A landmark **three part 2021 research review on effects to wildlife (including bees)** published in *Reviews on Environmental Health* by U.S. experts journalist Blake Levitt, Dr. Henry Lai and former U.S. Fish and Wildlife senior biologist Albert Manville state current science should trigger urgent regulatory action citing more than **1,200 scientific references** which **found adverse biological effects to wildlife** from even very low intensities of non ionizing radiation with findings of impacts to orientation and migration, reproduction, mating, nest, den building and survivorship. This 150-page report has more than 1,200 references (Levitt et al., 2021a, Levitt et al., 2021b, Levitt et al., 2021c).

Levitt, Lai, Manville (2021) **Effects of non-ionizing electromagnetic fields on flora and fauna, Part 3. Exposure standards, public policy, laws, and future directions.** Rev Environ Health. 2021 Sep 27. <https://pubmed.ncbi.nlm.nih.gov/34563106/>

German and Luxemburg Environmental Organizations Release Report on the Impact of Wireless Communications to Insects

<https://www.radiationresearch.org/news/german-and-luxemburg-environmental-organizations-release-report-on-the-impact-of-wireless-communications-to-insects/>

Excerpt: The results show that **EMF could have a serious impact on the vitality of insect populations.** ... Field strengths **100 times below the ICNIRP limits** could already have effects. When planning the expansion of mobile networks, **insect habitats should be protected** from high-intensity EMF exposure already now.

Study by the Swiss Federal Office for the Environment considers the connection between mobile communications and insect mortality to be probable (diagnose-funk.org)

<https://www.diagnose-funk.org/aktuelles/artikel-archiv/detail?newsid=1938>

In case it opens in German, click on the translate button (using a browser with that option)

Functionality Disorders in Bees, Birds and Humans

https://www.radiationresearch.org/wp-content/uploads/2018/06/021500_warnke.pdf

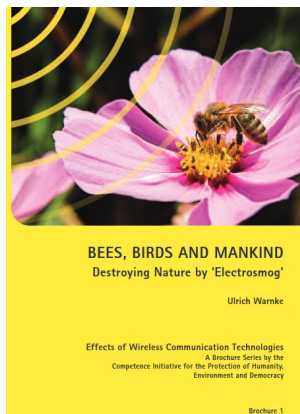
EM-Radiation Research Trust
EMF & Health – A Global Issue
Conference 8th & 9th September 2008,
The Royal Society, London

Functionality Disorders in Bees, Birds and Humans

Ulrich Warnke
Biosciences, University of Saarland

The Birds the Bees and Mankind

https://www.naturalscience.org/wp-content/uploads/2015/01/kompetenzinitiative-ev_study_bees-birds-and-mankind_04-08_english.pdf



Radiofrequency radiation injures trees around mobile phone base stations

<https://www.sciencedirect.com/science/article/abs/pii/S0048969716317375>





Science of The Total
Environment

Volume 572, 1 December 2016, Pages 554-569



Radiofrequency radiation injures trees around mobile phone base stations

Cornelia Waldmann-Selsam^a, Alfonso Balmori-de la Puente^b,
Helmut Breunig^c, Alfonso Balmori^d  

Highlights

- High frequency nonionizing radiation is becoming increasingly common.
- This study found a high level of damage to trees in the vicinity of phone masts.
- Deployment has been continued without consideration of environmental impact.

IARC – WIRELESS = A 2B, POSSIBLE CARCINOGEN

IARC - International Agency for Research on Cancer

The below link explains very well the information around the carcinogen classification around all wireless. Presently it's a 2b, possible carcinogen, based on an increased risk for glioma, a malignant type of brain cancer associated with wireless phone use, but experts feels it should be reclassified now as a full carcinogen, 1a.

<https://ehtrust.org/science/whoiarc-position-on-wireless-and-health/> IARC press release in 2011.

https://www.iarc.who.int/wp-content/uploads/2018/07/pr208_E.pdf

WHO/IARC advisory committee released a report last year recommending wireless radiation be re-evaluated by 2024 as a “high priority.” (pg. 156)

https://monographs.iarc.who.int/wp-content/uploads/2019/10/IARCMonographs-AGReport-Priorities_2020-2024.pdf

Recommendation for non-ionizing radiation (radiofrequency): High priority (and ready for evaluation within 5 years. (end of 2024) Dr. Anthony Miller, Toronto scientist and adviser to the WHO/IARC has said all wireless needs to be upgraded to a full carcinogen. Back in 2013, he already recommended to the Toronto Municipality that it be a 2b carcinogen: <https://www.youtube.com/watch?v=WARxnaxrRkk> Since then he's recommended that all wireless be re-classified as a full 1a carcinogen.

HEALTH IMPACT OF 5G

BRIEFING



Effects of 5G wireless communication
on human health

European Parliament: Health Impact of 5G

[https://www.europarl.europa.eu/RegData/etudes/STUD/2021/690012/EPRS_STU\(2021\)690012_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2021/690012/EPRS_STU(2021)690012_EN.pdf)

Non-thermal effects

The harmful effects of non-thermal biological interaction of RF-EMF with human and animal tissues have not been included in the determination of the ICNIRP 2020 guidelines (ICNIRP 2020a), despite the huge amount of available scientific publications demonstrating the harmfulness or potential harmfulness of those effects. Athermal bioresponses exist, and indeed some frequencies are being used for therapeutic purposes in a number of branches of medicine. Any drug, as we well know, even the most beneficial, may also entail some adverse effects. So, thermal as well as non-thermal effects of RF-EMF have to be considered in risk assessment. [...] 26 GHz and other MMW frequencies in general there is little literature exploring the possible adverse effects on health. The simple reason for this is that hitherto these frequencies have never been used for mass communication and hence there were few suitable populations exposed to these frequencies to study; there are likewise very few adequate studies on non-thermal effects on laboratory animals [...]

7. Overall evaluation

7.1 Cancer

FR1 (450 to 6 000 MHz): these FR1 frequencies are probably carcinogenic to humans.
FR2 (24 to 100 GHz): no adequate studies were performed on the higher frequencies.

7.2 Reproductive/developmental effects

FR1 (450 to 6000 MHz): these frequencies clearly affect male fertility. They possibly affect female fertility. They possibly have adverse effects on the development of embryos, foetuses and newborns.
FR2 (24 to 100 GHz): no adequate studies were performed on non-thermal effects of the higher frequencies.

8. Policy options

8.1 Opting for novel technology for mobile phones that enables RF-EMF exposures to be reduced

The sources of RF emissions that seem at present to pose the greatest threat are mobile phones. Though transmitting installations (radiobase masts) are perceived by some people as providing the greatest risk, actually the greatest burden of exposure in humans generally derives from their own mobile phones, and epidemiological studies have observed a statistically significant increase in brain tumours and Schwann cell tumours of the peripheral nerves, mainly among heavy cell-phone users. Accordingly, action is needed to ensure that safer and safer telephone devices are manufactured, emitting low energy and if possible only working when at a certain distance from the body. The cable earpiece solves much of the problem but is inconvenient and hence puts users off; on the other hand, it is not always possible to use speakerphone mode. The option of lowering RF-EMF exposure as much as possible in connection with telephones still applies whatever the frequencies being used, from 1G to 5G. [...]

8.2 Revising exposure limits for the public and the environment in order to reduce RF-EMF exposure from cell tower [...]

8.3 Adopting measures to incentivise the reduction of RF-EMF exposure [...]

8.4 Promoting multidisciplinary scientific research to assess the long-term health effects of 5G and to find an adequate method of monitoring exposure to 5G [...]

8.5 Promoting information campaigns on 5G

There is a lack of information on the potential harms of RF-EMF. The information gap creates scope for deniers as well as alarmists, giving rise to social and political tension in many EU countries. Public information campaigns should therefore be a priority. Information campaigns should be carried out at all levels, beginning with schools. People should be informed of the potential health risks, but also the opportunities for digital development, what infrastructural alternatives exist for 5G transmission, the safety measures (exposure limits) taken by the EU and Member States, and the correct use of mobile phones. Only with sound and accurate information can we win back citizen trust and reach a shared agreement over a technological choice which, if properly managed, can bring great social and economic benefits.

First Commission formed in the USA to Study the Environmental and Health Effects of 5G

<https://ehtrust.org/new-hampshire-state-report-on-health-and-environmental-effects-of-5g-and-wireless-radiation/>

The [5G Report](#) recommends US federal agencies coordinate “to protect people, wildlife, and the environment from harmful levels of radiation” and states “until there is Federal action, New Hampshire should take the initiative to protect its environment.”

<https://mdsafetech.org/2020/11/17/new-hampshire-commission-studies-5g-technology-health-and-environment-effects/>

The first Commission formed in the United States to study the environmental and health effects of 5G technology released their [comprehensive final report](#) November 1, 2020. The Commission to Study the Environmental and Health Effects of Evolving 5G Technology was born in the in the “Live Free or Die” state of New Hampshire, and included 15 recommendations addressing the need for public education about wireless hazards, RF health studies, RF measurements, cell antenna setbacks, [fiberoptic](#) rather than wireless deployment, commercial warning signs and wildlife protection. After hearing extensive testimony in a series of 13 meetings over the course of a year and reviewing an abundance of research, the Commission highlighted the lack of a single definition for 5G, insufficient evidence of safety for 5th generation technology, a concern that safety standards for wireless technologies have not been updated with the latest science and that 5G is largely a marketing concept. They also expressed concern that the FCC has a long history of being accountable to industry over the desires of communities and individuals.

<https://gc.nh.gov/statstudcomm/committees/1474/reports/5G%20final%20report.pdf>

State of New Hampshire

GENERAL COURT

CONCORD

Final Report of the Commission to Study The Environmental and Health Effects of Evolving 5G Technology (HB 522, Chapter 260, Laws of 2019, RSA 12-K:12-14)

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INDEPENDENT INFORMATION, SCIENTISTS AND RESOURCES

EMF Medical Conference 2021

<https://emfconference2021.com/>



This conference was convened online in January 2021, with a pre-lecture on EMF basics in October 2020, that was **attended by over 800 people from 30+ nations**. The information and resources provided at this conference is still very relevant today.

Presentations were made by internationally recognized scientists who have published in the field of bio-electromagnetics; by knowledgeable health practitioners who treat people for EMF associated illness and injuries; and, by healthy building engineers who test EMF exposures and mitigate hazards, will provide a high quality education and training experience.

American Academy of Environmental Medicine

“The peer reviewed, scientific literature demonstrates the correlation between RF (cell tower radiation) exposure and neurological, cardiac, and pulmonary disease as well as reproductive and developmental disorders, immune dysfunction, cancer and other health conditions. The evidence is irrefutable”

Physicians for Safe Technology

<https://mdsafetech.org/links/> <https://mdsafetech.org/science/>



“We are a group of physicians and health professionals whose mission is to provide trusted leadership in promoting, healthy and safe environments through the safer use of technology at home, in schools, in the workplace, in healthcare settings and in communities.”

Physicians for Safe Technology - Adverse Health Symptoms Near Cell Towers

<https://mdsafetech.org/cell-tower-health-effects/>

Oceania Radiofrequency Scientific Advisory Association (ORSAA) <https://www.orsaa.org/orsaa-database.html>

“ORSAA makes submissions and gives witness statements to the Federal Parliamentary Inquiry into 5G Wireless Communication Feb 2020” See [a letter written by ORSAA to Australian councils](https://www.orsaa.org/resources.html) (but is applicable to all councils). <https://www.orsaa.org/resources.html>

Environmental Health Trust

<https://ehtrust.org/science/>

Medical Doctors Consensus Statements – Cell Phone, Wireless Radiation

<https://ehtrust.org/science/medical-doctors-consensus-statements-recommendations-cell-phoneswireless/>

<https://ehtrust.org/scientific-research-on-5g-and-health/>

Dr Anthony Miller, MD, Professor Emeritus at the Dalla Lana School of Public Health at the University of Toronto. Dr. Miller to **Toronto Council** www.youtube.com/watch?v=wARxnaxrRKK (4 min)

Dec 2, 2013 Dr Anthony Miller from the University of Toronto's Dalla Lana School of Public Health presents to Toronto Council that RF exposure should be classified as a 2A (probable carcinogen), not a 2B (possible carcinogen)

Dr. Magda Havas Open Letters

<https://ehitrust.org/wp-content/uploads/Dr.-Magda-Havas-Letter-on-WiFi-in-Public-Places-.pdf>

<http://www.magdahavas.com/iarc-declares-rf-from-cell-phones-and-cell-towers-dangerous/>

Open letter by British medical doctors: Health and safety of Wi-Fi and mobile phones

<http://ssita.org.uk/wp-content/uploads/2014/03/British-Doctors-Letter-March-2014.pdf>

Open letter by British medical doctors: Health and safety of Wi-Fi and mobile phones

We wish to highlight our concern over the safety of exposure to microwave radiation from wireless technology, particularly for vulnerable groups like children, pregnant women, the elderly and those with compromised health.

There is growing concern that chronic (long-term) exposure to radiofrequency/microwave radiation from wireless technologies causes damage, particularly genetic damage, cognitive damage, cancer and decreased fertility. **There is now substantial evidence of a link between mobile phone use and brain cancer.** This was recognised by the International Agency for Research on Cancer (IARC)'s 30-strong panel of scientists, which in 2011 classed radiofrequency radiation as "possibly carcinogenic".

[...] **International medical agencies have recognised the evidence of harm** (see appended list) **but these rulings may take many years to be reflected in public health policy.** This controversy is a common characteristic of scientific understanding when environmental exposures are new. ... Commercial pressures often delay the acceptance of health risks, even when scientific evidence is compelling. In the case of tobacco, asbestos, x-rays and leaded petrol, for example, it took many decades before damage was established and accepted by health agencies and, during those decades, millions of people suffered ill health and death as a result of the delay. Now, despite evidence of harm, wireless technology is being rolled out widely.

We urge health agencies and the public to act immediately to reduce exposure to radiofrequency/ microwave radiation. This is especially important for children, who are physiologically more vulnerable to this exposure, and for whom adults have a safeguarding responsibility. Children's health should be put ahead of convenience and commercial benefits. Children should not use mobile phones except in an emergency, and WiFi should be replaced with wired alternatives in schools and other settings where children spend considerable time.

EMF Portal

<https://www.emf-portal.org/en>

The internet information platform EMF-Portal of the RWTH Aachen University summarizes systematically scientific research data on the effects of electromagnetic fields (EMF). All information is made available in both English and German. The core of the EMF-Portal is an extensive literature database with an inventory of **41,000 publications and 7,012 summaries of individual scientific studies on the effects of electromagnetic fields.**

Dr. Martin L. Pall's Latest Compilation of EMF Medical Research Literature

<https://www.radiationresearch.org/wp-content/uploads/2018/06/EU-EMF2018-6-11US3.pdf>

APPEALS FROM DOCTORS AND SCIENTISTS

International Appeal: Scientist call for Protection from Non-ionizing Electromagnetic Field Exposure

<https://emfscientist.org>

As of July 14, 2023, 259 EMF scientist from 44 nations and 15 Supporting Scientist from 11 nations have signed the Appeal.



2020 Consensus Statement of UK and International Medical and Scientific Experts and Practitioners on Health Effects of Non-Ionising Radiation (NIR)

<https://phiremedical.org/wp-content/uploads/2020/11/2020-Non-Ionising-Radiation-Consensus-Statement.pdf>

International 5G Appeal <http://www.5gappeal.eu>

Scientists and Doctors call for a moratorium on the roll out of 5G. 5G will substantially increase exposure to radiofrequency electromagnetic fields RF-EMF, that has been proven harmful for humans and the environment.

Suspend 5G Appeal <https://www.appel5gappeal.ca>

URGENT APPEAL to the Government of Canada to Suspend the 5G Rollout and choose Safe and Reliable Fibre Connections

International Doctors Appeal - Wireless Radiation Poses a Health Risk. Physicians Demand Overdue Precaution!

http://profdrkarlhecht.de/wp-content/uploads/2016/01/International-Doctors-Appeal-2012_oct-1.pdf

FACT SHEET: Scientific evidence invalidates health assumptions underlying the FCC and ICNIRP exposure limit determinations for radiofrequency radiation: implications for 5G

<https://icbe-emf.org/wp-content/uploads/2022/10/fact-sheet-221009-v2.pdf>

International Doctors Appeal 2012

http://freiburger-appell-2012.info/media/International_Doctors_Appeal_2012_Nov.pdf

BioInitiative Report: A Rationale for a Biologically-based Public Exposure Standard for Electromagnetic Fields (ELF and RF)

<https://bioinitiative.org/>

WHO WE ARE

The BioInitiative 2012 Report has been prepared by 29 authors from ten countries, ten holding medical degrees (MDs), 21 PhDs, and three MsC, MA or MPHs. Among the authors are three former presidents of the Bioelectromagnetics Society, and five full members of BEMS.

<https://bioinitiative.org/conclusions/>

BIOINITIATIVE 2012 – CONCLUSION Table 1-1

Overall, these 1800 or so new studies report abnormal gene transcription (Section 5); genotoxicity and single-and double-strand DNA damage (Section 6); stress proteins because of the fractal RF-antenna like nature of DNA (Section 7); chromatin condensation and loss of DNA repair capacity in human stem cells (Sections 6 and 15); reduction in free-radical scavengers – particularly melatonin (Sections 5, 9, 13, 14, 15, 16 and 17); neurotoxicity in humans and animals (Section 9), carcinogenicity in humans (Sections 11, 12, 13, 14, 15, 16 and 17); serious impacts on human and animal sperm morphology and function (Section 18); effects on offspring behavior (Section 18, 19 and 20); and effects on brain and cranial bone development in the offspring of animals that are exposed to cell phone radiation during pregnancy (Sections 5 and 18). This is only a snapshot of the evidence presented in the BioInitiative 2012 updated report.

BIOEFFECTS ARE CLEARLY ESTABLISHED

Bioeffects are clearly established and occur at very low levels of exposure to electromagnetic fields and radiofrequency radiation. Bioeffects can occur in the first few minutes at levels associated with cell and cordless phone use. Bioeffects can also occur from just minutes of exposure to mobile phone masts (cell towers), WI-FI, and wireless utility 'smart' meters that produce whole-body exposure. Chronic base station level exposures can result in illness.

BIOEFFECTS WITH CHRONIC EXPOSURES CAN REASONABLY BE PRESUMED TO RESULT IN ADVERSE HEALTH EFFECTS

Many of these bioeffects can reasonably be presumed to result in adverse health effects if the exposures are prolonged or chronic. This is because they interfere with normal body processes (disrupt homeostasis), prevent the body from healing damaged DNA, produce immune system imbalances, metabolic disruption and lower resilience to disease across multiple pathways. Essential body processes can eventually be disabled by incessant external stresses (from system-wide electrophysiological interference) and lead to pervasive impairment of metabolic and reproductive functions.

LOW EXPOSURE LEVELS ARE ASSOCIATED WITH BIOEFFECTS AND ADVERSE HEALTH EFFECTS AT CELL TOWER RFR EXPOSURE LEVELS

At least five new cell tower studies are reporting bioeffects in the range of 0.003 to 0.05 $\mu\text{W}/\text{cm}^2$ at lower levels than reported in 2007 (0.05 to 0.1 $\mu\text{W}/\text{cm}^2$ was the range below which, in 2007, effects were not observed). Researchers report headaches, concentration difficulties and behavioral problems in children and adolescents; and sleep disturbances, headaches and concentration problems in adults. Public safety standards are 1,000 - 10,000 or more times higher than levels now commonly reported in mobile phone base station studies to cause bioeffects.

EVIDENCE FOR FERTILITY AND REPRODUCTION EFFECTS: HUMAN SPERM AND THEIR DNA ARE DAMAGED [...]

LEGAL CASES

Phonegate Canada: Court authorizes class action against Apple and Samsung



<https://phonegatealert.org/en/class-action-apple-samsung/> / <https://phonegatealert.org/en/phonegate-canada-denial-of-transparency-by-health-canada/>

EHT VS FCC A Historic Ruling!

<https://ehtrust.org/wp-content/uploads/EHT-et-al.-v.-FCC-Factsheet-EHTRUST.org-1-1.pdf>

2021: The FCC lost a court case against EHT (Environmental Health Trust). **Two of the court orders: (i) address the impacts of RF radiation on children, the health implications of long-term exposure to RF radiation ... and (ii) address the impacts of RF radiation on the environment.**

FCC = Federal Communications Commission. It sets limits on the amount of RF energy people can be exposed to. It hasn't updated its RF guidelines since 1996. Evidence of harm was ignored.

Environmental Lawsuit in Tahoe involving Telecom + Governing Bodies

Tahoe For Safer Tech – The Problem <https://www.tahoeforsafertech.org/problem>

The Lake Tahoe Region faces severe scenic and environmental degradation thanks to profit-hungry telecom companies. If successful, our lawsuit will prevent hundreds of cell towers and wireless antennas from being installed and destroying Lake Tahoe's pristine ecosystem. Luckily, a safe and environmentally-friendly solution to wireless broadband already exists — fiber optic networks. Tahoe For Safer Tech – The Science <https://www.tahoeforsafertech.org/science>

Alerte PhoneGate Association. The Court of Appeal of Turin Confirms the Link between a Head Tumour and Mobile Phone Use.

Phonegate Team (2020). Available online at:

<https://phonegatealert.org/en/the-court-of-appeal-of-turin-confirms-the-link-between-a-head-tumour-and-mobile-phone-use/>

<https://phonegatealert.org/en/tumor-cellphone-court-appeal-turin-indemnifies-employee/>

In a judgment dated November 2, 2022, the Court of Appeal of Turin confirmed the decision of the first instance, condemning [INAIL](#) [Istituto nazionale Assicurazione Infortuni sul Lavoro – National Institute for Work Accident Insurance] to compensate the victim of an intracranial tumor of the acoustic neuroma linked to the use of cell phones.

Cell phones: One hundred of brain tumor victims demand justice in the USA

<https://phonegatealert.org/en/cell-phones-one-hundred-of-brain-tumor-victims-demand-justice-in-the-usa/>

“High Probability” that cell phone radiation causes brain tumors says 32 year US Government Scientist - CDC and National Toxicology Program - in expert report to court

<https://ehtrust.org/high-probability-that-cell-phone-radiation-causes-brain-tumors-says-32-year-us-government-scientist-cdc-and-national-toxicology-program-in-expert-report-to-court/>

Expert Report: <https://ehtrust.org/wp-content/uploads/Expert-report-Christopher-J-Portier-Murray-v-Motorola-3-1-2021-1.pdf>

From: [Marion](#)
To: [Proton, Adriana](#); [Matthews, Rayanne](#)
Subject: Fw: re: Proposed cell tower at 1000 Piercy Ave. Courtenay
Date: Monday, September 22, 2025 8:46:44 AM
Attachments: [THE LARGEST UNETHICAL MEDICAL EXPERIMENT IN HUMAN HISTORY.pdf](#)

Sent with [Proton Mail](#) secure email.

----- Forwarded Message -----

From: Marion <[REDACTED]>
Date: On Thursday, August 21st, 2025 at 7:46 AM
Subject: re: Proposed cell tower at 1000 Piercy Ave. Courtenay
To: mayor@courtenay.ca <mayor@courtenay.ca>, wcole-hamilton@courtenay.ca <wcole-hamilton@courtenay.ca>, dfrisch@courtenay.ca <dfrisch@courtenay.ca>, dhillian@courtenay.ca <dhillian@courtenay.ca>, ejolicoeur@courtenay.ca <ejolicoeur@courtenay.ca>, mmccollum@courtenay.ca <mmccollum@courtenay.ca>, dbeatson@courtenay.ca <dbeatson@courtenay.ca>, planning@courtenay.ca <planning@courtenay.ca>, jschile@courtenay.ca <jschile@courtenay.ca>, briangregg@sitepathconsulting.com <briangregg@sitepathconsulting.com>

Hello,

Here is a link to the study on wireless radiation that will help you understand the opposition to the proposed cell tower.

THE LARGEST UNETHICAL MEDICAL EXPERIMENT IN HUMAN HISTORY

<https://repository.gatech.edu/server/api/core/bitstreams/7fa566cb-6b67-4373-84f9-06a49947a165/content>

Since it is over 1000 pages long, I don't expect you to read it all by the time you are deciding whether or not to grant Telus yet another letter of concurrence. Here are some key items that you need to know about:

ABSTRACT:

This monograph describes the largest unethical medical experiment in human history: the implementation and operation of non-ionizing non-visible EMF radiation (hereafter called wireless radiation) infrastructure for communications, surveillance, weaponry, and other applications. It is unethical because it violates the key ethical medical experiment requirement for "informed consent" by the overwhelming majority of the participants. The monograph provides background on unethical medical research/experimentation, and frames the implementation of wireless radiation within that context. The monograph then identifies a wide spectrum of adverse effects of wireless radiation as reported in the

premier biomedical literature for over seven decades. Even though many of these reported adverse effects are extremely severe, the true extent of their severity has been grossly underestimated.

Addition of the nascent fifth generation of mobile networking technology (5G) globally to the existing mobile technology network will contribute further to the largest unethical medical experiment in human history!

A small fraction of the population has given informed consent to wireless radiation exposure, gambling (like users of cigarettes, cocaine, fentanyl) that they can escape the severe adverse consequences of exposure. Another small fraction of the population has not given informed consent, but receives harmful second-hand exposure because of the broad-scale transmission of wireless radiation from terrestrial and satellite sources. The vast majority of the population has given Mis-informed Consent to this exposure. This mis-information is supplied by the telecommunications industry, its lobbyists, its government partners, its political enablers, its marketing arm (the mainstream media), and even some academic enablers. While research over the past seventy+ years has shown hard evidence of severe adverse effects from wireless radiation, the full extent of the damage from existing wireless radiation infrastructure is not known, much less the damage expected from 4G/5G infrastructure being implemented rapidly today. Attempting to identify the full extent of these adverse effects is the global medical experiment being conducted today. The fact that this experiment is being conducted with mis-informed consent makes it an unethical medical experiment. Because of the magnitude of this experiment, it is the largest unethical medical experiment in human history!

Appendix 5 shows the potential contribution of wireless radiation to the opioid crisis and potential contribution of wireless radiation to exacerbation of the coronavirus pandemic.

Appendix 7 describes the under-recognized adverse effects of wireless radiation related to medical implants (pacemakers, defibrillators, cochlear implants, dental implants, bone pins, etc) and metal appendages (metal jewelry, etc), and potential micro/nano-implant analogues. Appendix 8 shows adverse effects of wireless radiation on automotive vehicle occupants (and bystanders), and the under-advertised on-board and external sources of this radiation.

This is just a tiny fraction of this research paper, which should make you curious enough to delve deeper.

Again, I do NOT CONSENT for this Telus cell tower to be built in my neighbourhood.

Respectfully,
Marion Hoerberg

Sent with [Proton Mail](#) secure email.

Marion Hoerberg
Kiwanis Village resident

August 25, 2025

Re: proposed 46 meter cell tower at 1000 Piercy Ave. Courtenay, BC

Dear recipient,

You are receiving this information package, because after repeatedly emailing all city councillors, the mayor and planning department, I have not received a single acknowledgement or reply to any of them. As a matter of fact, only a couple of you even opened my emails (I receive a notification if and when you do open my emails).

Correct me if I'm wrong, but aren't you supposed to be representing the interests of the residents of the city of Courtenay? I'm your constituent and I really want to have some feedback to my questions and provided information. It is my position that this cell tower is harmful to any and all humans, animals and plants in this densely populated area, which is why I do not consent to it being built in my backyard, so to speak.

So please do your job, read the information that I and others have provided to you and give us answers to the questions and address our valid concerns. Someone will be making a presentation on this topic, but how on earth can he make you aware of all the issues with cell towers in 10 minutes?

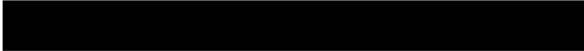
I look forward to your replies.

Respectfully,

Marion Hoerberg

re: Proposed cell tower at 1000 Piercy Ave. Courtenay

From



To mayor@courtenay.ca, wcole-hamilton@courtenay.ca, dfrisch@courtenay.ca, dhillian@courtenay.ca, ejolicoeur@courtenay.ca, mmccollum@courtenay.ca, dbeatson@courtenay.ca, planning@courtenay.ca, jschile@courtenay.ca, briangregg@sitepathconsulting.com

Date Thursday, August 21st, 2025 at 7:46 AM

Hello,

Here is a link to the study on wireless radiation that will help you understand the opposition to the proposed cell tower.

THE LARGEST UNETHICAL MEDICAL EXPERIMENT IN HUMAN HISTORY

<https://repository.gatech.edu/server/api/core/bitstreams/7fa566cb-6b67-4373-84f9-06a49947a165/content>

Since it is over 1000 pages long, I don't expect you to read it all by the time you are deciding whether or not to grant Telus yet another letter of concurrence. Here are some key items that you need to know about:

ABSTRACT:

This monograph describes the largest unethical medical experiment in human history: the implementation and operation of non-ionizing non-visible EMF radiation (hereafter called wireless radiation) infrastructure for communications, surveillance, weaponry, and other applications. It is unethical because it violates the key ethical medical experiment requirement for "informed consent" by the overwhelming majority of the participants. The monograph provides background on unethical medical research/experimentation, and frames the implementation of wireless radiation within that context. The monograph then identifies a wide spectrum of adverse effects of wireless radiation as reported in the premier biomedical literature for over seven decades. Even though many of these reported adverse effects are extremely severe, the true extent of their severity has been grossly underestimated.

Addition of the nascent fifth generation of mobile networking technology (5G) globally to the existing mobile technology network will contribute further to the largest unethical medical experiment in human history!

A small fraction of the population has given informed consent to wireless radiation exposure, gambling (like users of cigarettes, cocaine, fentanyl) that they can escape the severe adverse

consequences of exposure. Another small fraction of the population has not given informed consent, but receives harmful second-hand exposure because of the broad-scale transmission of wireless radiation from terrestrial and satellite sources. The vast majority of the population has given Mis-informed Consent to this exposure. This mis-information is supplied by the telecommunications industry, its lobbyists, its government partners, its political enablers, its marketing arm (the mainstream media), and even some academic enablers. While research over the past seventy+ years has shown hard evidence of severe adverse effects from wireless radiation, the full extent of the damage from existing wireless radiation infrastructure is not known, much less the damage expected from 4G/5G infrastructure being implemented rapidly today. Attempting to identify the full extent of these adverse effects is the global medical experiment being conducted today. The fact that this experiment is being conducted with mis-informed consent makes it an unethical medical experiment. Because of the magnitude of this experiment, it is the largest unethical medical experiment in human history!

Appendix 5 shows the potential contribution of wireless radiation to the opioid crisis and potential contribution of wireless radiation to exacerbation of the coronavirus pandemic.

Appendix 7 describes the under-recognized adverse effects of wireless radiation related to medical implants (pacemakers, defibrillators, cochlear implants, dental implants, bone pins, etc) and metal appendages (metal jewelry, etc), and potential micro/nano-implant analogues. Appendix 8 shows adverse effects of wireless radiation on automotive vehicle occupants (and bystanders), and the under-advertised on-board and external sources of this radiation.

This is just a tiny fraction of this research paper, which should make you curious enough to delve deeper.

Again, I do NOT CONSENT for this Telus cell tower to be built in my neighbourhood.

Respectfully,
Marion Hoerberg

Sent with [Proton Mail](#) secure email.

4.89 MB 1 file attached

THE LARGEST UNETHICAL MEDICAL EXPERIMENT IN HUMAN HISTORY.pdf 4.89 MB

re: Public Feedback re: 46-meter tall mono pole tower at 1000 Piercy Avenue, Courtenay Tower Installation Project / Reference: BC 113127 – Courtenay

From [REDACTED]
To mayor@courtenay.ca, wcole-hamilton@courtenay.ca, dfrisch@courtenay.ca, dhillian@courtenay.ca, ejolicoeur@courtenay.ca, mmccollum@courtenay.ca, dbeatson@courtenay.ca, planning@courtenay.ca, briangregg@sitepathconsulting.com, jschile@courtenay.ca
BCC Jordan Leighton <[REDACTED]>, Hilary <[REDACTED]>, Sonja Limberger <[REDACTED]>
Date Friday, August 15th, 2025 at 2:44 PM

Well, hello,

It's me AGAIN...Believe me, I'm as sick and tired of writing these emails as you are reading them. Sadly, most of my emails don't even get opened at all. My email program sends me receipts once my emails have been opened and so far only three city councilors have bothered to open one of my emails.

In this email, I will not bombard you with studies that prove how harmful prolonged and constant exposure to RF frequencies of any spectrum are to humans, animals and plants. Unless you have been living under a rock the last ten years, it must have dawned on you that maybe we have another "oh, but we thought smoking is good for your health" scenario on the horizon. I assume that at least by now, you have learned not to hold your cellphone to your head...but it's alright if others get zapped 24/7 by a cell tower in their backyard.

I live in Kiwanis village in Courtenay, in very close proximity to the proposed cell tower. Amongst other health issues, I suffer from EHS (Electro hypersensitivity). I spent a lot of money in an attempt to mitigate the harms done from cell towers, my neighbour's routers, etc. So if push comes to shove, I may be able to protect myself from the cell tower in my backyard. If not, I'll have to move away again, which I can hardly afford to do.

However, this is not a pity party for me. I want to speak for all the unsuspecting people in my immediate neighbourhood, all of whom would be negatively affected, should this cell tower be built. As I pointed out in my previous (mostly ignored) email to you, there are several large institutions/buildings located in the affected area:

- The Junction (houses active drug users)
- The Comox Valley Recovery House

- A Halfway House
- Salvation Army Emergency shelter
- Kiwanis Village (home to 64 elderly people with numerous health issues)
- Lighthouse Early Education (3-5 years old)
- Little Sparks daycare
- Several large apartment complexes
- Several businesses along McPhee Ave. whose employees will be exposed, even though they are not "residents"

Sure, Brian Greg (on behalf of Telus) and Sitepath have jumped the appropriate hoops and sent out over 400 letters to residents, telling them about the proposed cell tower. Reality is that most people still have no idea about the dangers of cell tower radiation, hence the overwhelming silence and acquiescence by most residents. Also, several residents in the neighbourhood felt that they had no say, anyhow, and that they were powerless to stop it. Also interesting was that when I spoke to staff at the businesses on McPhee, the staff had no idea about the cell tower about to be put in their backyard. Also, neither did the parents of the children and the staff in the two daycares.

When it comes to safety, Brian Gregg simply refers to Safety Code 6 and Health Canada (which you should know by now- is a farce). There are no links to studies either showing that cell towers are safe or that they are not. Just the usual: "trust us, the government gave us the OK" is implied.

As I sit in my living room facing Pidcock Ave. I see a never-ending stream of men (mostly) of all age groups walking past my window. The vast majority are coughing their lungs out, walk hunched over, vomit on my front lawn or smoke crack leaning against my fence. I have a couple of Naloxone kits in case I come across someone who has overdosed. There are people sleeping along the fences and in the bus shelter.

The residents of Kiwanis Village are all seniors and many of them are in bad health. When I moved in last year, five residents died within 5 months. I personally know two people with active cancer in the Village right now.

There are young children in the daycares five days a week for 8 or more hours. Children are the most vulnerable when it comes to radio frequencies. So many studies confirm this.

So tell me, how can any of you consider in good conscience to have a cell tower put right smack in the middle of this part of town, where we have the highest density of vulnerable people living in close quarters? Not one of you can guarantee that no harm will come to us. Who can people take to court if they are harmed by this cell tower? What's your line in the sand? How many children with brain tumours or old people with cancer? Trust me, when people get sick, they don't care about

dropped calls.

In case I didn't make myself clear: I do not consent to this cell tower being built.

For those of you taking the time to read this email: thank you for your time. At least you have done your due diligence and have read my concerns as a constituent, which IS your job, after all.

Respectfully,

Marion Hoerberg

Sent with [Proton Mail](#) secure email.

Another 5G tower in Courtenay? 1000 block of piercy avenue

From



To mayor@courtenay.ca, wcole-hamilton@courtenay.ca, dfrisch@courtenay.ca, dhillian@courtenay.ca, ejolicoeur@courtenay.ca, mmccollum@courtenay.ca, dbeatson@courtenay.ca, planning@courtenay.ca

Date Thursday, August 7th, 2025 at 9:28 AM

Hello again,

You might have seen this video already. If not, here it is; especially made for you.

<https://youtube.com/watch?v=4llbGpewzQQ&feature=shared>

Have a great day,
Marion Hoerberg

Sent from Proton Mail Android

re: proposed TELUS cell tower at 1000 Piercy Rd. Courtenay

From

[REDACTED]

To mayor@courtenay.ca, wcole-hamilton@courtenay.ca, dfrisch@courtenay.ca, dhillian@courtenay.ca, ejolicoeur@courtenay.ca, mmccollum@courtenay.ca, wmorin@courtenay.ca, dbeatson@courtenay.ca, planning@courtenay.ca

BCC

[REDACTED]

Date Tuesday, August 5th, 2025 at 9:01 AM

PLEASE NOTE: 3 FILES ATTACHED TO THIS EMAIL

Hello mayor and council members,

I'm writing to you to inform you that I do NOT CONSENT to the building of the proposed cell tower at the above mentioned site. I received an information package from Brian Gregg of Sitepath and TELUS. I'm one of hundreds residents that will be directly and negatively affected by this cell tower, should it be allowed to be built.

I personally suffer from Electrohypersensitivity <https://pubmed.ncbi.nlm.nih.gov/35537497/> and I spend a lot of time and energy to try and protect myself from harmful EMF radiation, so I can function. Now there is this prospect of a cell tower being built a block away from my home. I actually lived in an RV outside of town for a couple of years, just to get away from all the radiation. My health improved substantially. However, other issues made it impossible to stay there. I applied for subsidized housing (I'm on a disability pension) and after over two years of waiting, I was able to move to Kiwanis Village. I struggle to protect myself from EMFs, but I can function most days. With the looming cell tower in my backyard, I might be forced to move yet again. I went to the TELUS/Sitepath presentation on July 24th at the Filberg Centre. When I said to the representatives that I might have to move again if this cell tower was built, Brian Gregg and the TELUS representative laughed and said something to the effect of "yeah, looks like it" and chuckled. They pointed out that people's health concerns are "not part of their scope".

Some of my questions to you are:

- Are you aware that there is a daycare (Lighthouse Early Learning at 1000 Cumberland Rd.) that would be directly affected by this proposed cell tower? I assume the owners of the daycare have been notified. Have the individual parents of these children been notified?
- Are you aware of the close proximity of the proposed cell tower to Kiwanis village (635 & 750 Pidcock Ave), The Junction (988-8th St.), the Recovery Centre (641 Menzies), the Salvation Army Emergency Shelter (632 Pidcock Ave) and the halfway house (9948 - 8th St.)? Have the individual inhabitants of these place all been informed? Many of them have major health

issues as it is and being radiated at such close proximity will not help them on their healing journey.

- Are you aware of Safety Code 6, which all telecom companies refer to? If so, are you aware of its limitations? Please see attachments.
- Are you aware that the CVRD has declined several proposed cell towers in the CVRD over the last three years, because concerned citizens have spoken up and demanded proof that the radiation is safe (which nobody can provide)? It might be a good idea to speak to the CVRD, who have been privy to several presentations about the risks of EMFs by doctors and EMF experts. The CVRD council members have access to all the information that has been submitted on the topic of cell tower harms; perhaps you can ask them to share it with you.
- Are you aware of the dangers of cell tower radiation in general? Please see attachments.
- Are you aware that there are many cities, provinces and countries that have banned 5G cell towers, due to the health risks for humans, animals and plants? <https://smombiegate.org/list-of-cities-towns-councils-and-countries-that-have-banned-5g/>
<https://www.newswire.ca/news-releases/twenty-four-canadian-groups-say-suspend-5g-until-proven-safe-868715036.html> and <https://www.gaia.com/article/5g-health-risks-the-war-between-technology-and-human-beings>
- Sitepath and TELUS keep telling us that an additional cell tower is needed, because people complain about "bad" service. When I ask for data showing what he claims, he says he can't show me. TELUS just decides that a tower is needed. Do you think this is acceptable? Here is a map of the existing cell towers in the valley: https://www.ertyu.org/steven_nikkel/cancellsites.html?lat=49.698717&lng=-124.933434&zoom=13&type=Roadmap&layers=a&pid=0&ds=0 Do we really need more?????
- What about the city employees that will have to work in close proximity to the proposed tower? Have they been informed of the potential risks? Do they have any input regarding this tower at their workplace? They are not residents in the area, but they will be directly affected.
- What about all the rooftop antennas that are already in place in downtown Courtenay. They are very wide-spread and easily visible. Have you or anyone else ever measured the EMF levels in the downtown area? Some friends of mine with Trifield meters have and the readings are atrocious already. Are you seriously going to add to the existing dangerous EMF levels in the city? Perhaps you can find an unbiased person with a meter that can show you the existing EMF levels (meaning not employed by a Telecom business).
- Brian Gregg and the TELUS representative said that they had to mail out over 400 information packages. I assume that is over 400 addresses. Some households will have two or more members. So this proposed cell towers will affect maybe a thousand or more residents. The vast majority of them have no idea of the harm that's coming their way. How

can people give informed consent if they don't know the potential risks and are told to trust telecom giants that tell them that they are following Health Canada's Safety code 6, which is a farce. Are you willing to put these people at risk, just so that TELUS can make their customers happy? According to Brian Gregg and the TELUS representative, that the only mandate they have: make TELUS customers happy. Shouldn't we apply the precautionary principle in this case and any other proposed cell tower?

I look forward to receiving your answers to my questions. There will be a delegation at a future city council meeting, that will present many of my talking points.

Respectfully,
Marion Hoerberg

Sent with [Proton Mail](#) secure email.

5.26 MB 3 files attached

Health Canada denies proven dangers of microwave radiation.pdf 636.71 KB Safety code 6.pdf 657.74 KB

Guide_Stop Wireless 5G Why safety code 6 is fixed.pdf 4.00 MB

SCIENTIFIC RESEARCH STUDIES



European Parliament requested a research report "**Health Impact of 5G**" which was released in July 2021 and concluded that commonly used RFR frequencies (450 to 6000 MHz) are probably carcinogenic for humans and clearly affect male fertility with possible adverse effects on the development of embryos, fetuses and newborns.

A review entitled "**Evidence for a health risk by RF on humans living around mobile phone base stations: From radiofrequency sickness to cancer**" reviewed the existing scientific literature and found radiofrequency sickness, cancer and changes in biochemical parameters (**Balmori 2022**).

A **study** published in Electromagnetic Biology and Medicine found changes in blood considered biomarkers predictive of cancer in people living closer to cell antenna arrays (**Zothansiana 2017**).

A **study** published in the International Journal of Environmental Research and Public Health found higher exposure to cell network arrays linked to higher mortality from all cancer and specifically lung and breast cancer (**Rodrigues 2021**).

A 10-year **study** published in Science of the Total Environment on cell phone network antennas by the local Municipal Health Department and several universities in Brazil found a clearly elevated relative risk of cancer mortality at residential distances of 500 meters or less from cell phone towers (**Dode 2011**).

A **study** commissioned by the Government of Styria, Austria found a significant cancer incidence in the area around the RF transmitter as well as significant exposure-effect relationships between radiofrequency radiation exposure and the incidence of breast cancers and brain tumors (**Oberfeld 2008**).

A **review** published in Experimental Oncology found "alarming epidemiological and experimental data on possible carcinogenic effects of long term exposure to low intensity microwave (MW) radiation." A year of operation of a powerful base transmitting station for mobile communication reportedly resulted in a dramatic increase of cancer incidence among the population living nearby (**Yakymenko 2011**).

Are your symptoms caused by your wireless devices?

Common Symptoms of Microwave Sickness/Electro-Sensitivity

Brain

Headaches
Insomnia/Sleep Problems
Dizziness
Difficulty Concentrating
Memory Problems
Brain Fog
Fatigue

Ears

Tinnitus
Humming
Sharp Pain
Noise Sensitivity

Skin

Skin Rash
Itching
Burning
Facial Flushing

Eye

Pressure In/Behind Eyes
Eye Twitching
Deteriorating Vision
Vision Disturbances
Cataract

Heart

Palpitations
Arrhythmia
Chest Pain/Pressure
Difficulty Breathing
Low/High Blood Pressure

Mood

Irritability
Depression

Other

Adrenal Problems
Digestive Problems
Weight Loss/Gain
Tingling
Dehydration
Hair Loss
Flu Like Symptms

Longterm

Cancer
ADD/ADHD
Autism
Alzheimer's
Oxidative Stress
DNA Damage

Children are more susceptible to biological effects from wireless radio frequency radiation

5G & CELL TOWERS

EUROPE

- Resolutions to halt 5G in numerous European cities including Trafford, UK, Lille, France, Ormidia, Cyprus, Councils in Ireland and more.

SWITZERLAND

- Parliament refused to weaken radio frequency radiation (RFR) limits after 5G Report.

FRANCE

- 60 mayors/officials petition to halt 5G.
- Federal health agency investigating 5G
- 5G antenna RFR measured.

CANADA

- City of Toronto "Prudent Avoidance Policy" for Cell Towers.

BULGARIA

- Mezdra and Balchik have banned 5G.

NETHERLANDS

- Health Council recommend against 26 GHz for 5G due to lack of safety data.

TALY

- 600 municipalities have passed resolution to halt 5G.

ISRAEL

- Cell tower setback 100m from schools/ homes.

RUSSIA

- No cell towers near schools.

UNITED STATES

- Resolutions to halt 5G passed in Hawaii County HI, Farragut TN, Keene NH & Easton CT.
- Numerous cities restrict cell antennas near homes including: Los Altos, Petaluma, Mill Valley, Malibu and San Diego County CA, Bedford NH and more.
- New Hampshire 5G Commission's 15 Recommendations include increasing transparency, reduce public exposure, research health effects and protect wildlife and trees.
- Oregon investigating health effects of wireless.
- Los Angeles CA Public Schools: RFR Limit 10,000x less than FCC.
- Palo Alto, Los Angeles LA Schools Greenbelt MD, Bar Harbor ME; No school cell towers



CYPRUS

- Cyprus National Committee on Environment and Child Health 5G Position Paper calls for 5G free zones.

AUSTRALIA

- New South Wales Dept. of Education policy objects to towers on/near schools.

LITHUANIA

- Cell antennas prohibited on kindergartens and hospitals.

CHILE

- Cell antennas prohibited in "sensitive areas" -kindergartens, hospitals and nursing homes.

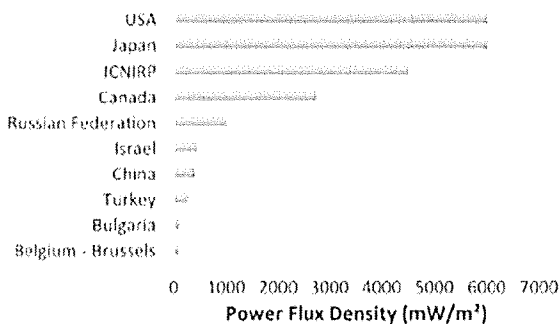
INDIA

- RFR limit tightened to 1/10 of CNIRP limits after Inter-Ministerial Report on impacts to wildlife.
- Mumbai, Zilla Parishad & Karnataka: Cell towers prohibited/removed near schools, colleges, orphanages and old age homes.
- Brihanmumbai Municipal: Cell towers banned at parks and playgrounds.
- State of Rajasthan: Supreme Court of India upheld removal of "hazardous to life" cell towers from vicinity of schools, hospitals/playgrounds.

BANGLADESH

- No cell towers on homes, schools, colleges, playing fields, populated areas and heritage areas.

Numerous Countries Have Cell Tower Network RFR Exposure Limits Far More Stringent Than ICNIRP/FCC (USA):

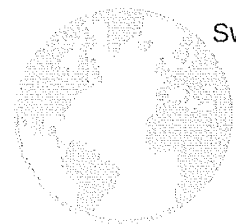


RFR power flux density exposure limits at 900 MHz (Clegg 2020)

- China
- Russia
- Italy
- India
- Israel
- Chile
- Switzerland
- Brussels, Belgium
- Belarus
- Serbia
- Slovenia
- Montenegro
- Bulgaria
- Turkey
- Greece
- India
- Tajikistan
- Kazakhstan
- Uzbekistan
- Kyrgyzstan

These Governments Measure & Publish RFR Levels Online

- France
- Spain
- Austria
- Greece
- Turkey
- India
- Israel
- Gibraltar
- Brussels Belgium
- Switzerland
- Bulgaria
- Tunisia
- Malta
- Brazil
- Bahrain
- Monaco
- French Polynesia



HAWAII

- **Hawai'i County Council HI** passed a Resolution to halt 5G

NEW HAMPSHIRE

- **Keene NH Resolution** to halt 5G
- **Bedford NH** 750 ft. setback

MASSACHUSETTS

Randolph MA 500 ft setback. Yearly RFR measurements.
Lunenburg and Great Barrington MA 500 ft setback
Stockbridge MA prohibits a tower from being built 1000 feet from a school, park or athletic field and 600 ft from residence.

CALIFORNIA

Numerous CA cities restrict cell antennas near homes with setbacks and strict ordinances including: **Los Altos, Petaluma, Mill Valley, Malibu, Santa Barbara, Nevada City, Suisin, Calabasas, San Clemente, Westlake, Sonoma, Sebastopol, San Rafael, Ross Valley, Encinitas, Fairfax, Palo Alto, Walnut City and San Diego County.**

WISCONSIN

- **Greendale WI** passed Resolution R2018-20 referring to the FCC's actions stripping local authority as "an unprecedented attack on local control."

New York

- **Copake NY:** Pre/post testing by RF engineer. No repeater closer than 200 ft to dwelling. No tower closer than 1500 ft to residence/church.

MAINE

- **Bar Harbor ME** 1,500 ft setback - cell towers near schools/daycare .

ILLINOIS

- **Oak Brook IL** Resolution 2020-ITGL-R-1891 calls for local control re small cels.

CONNECTICUT

- **Easton CN City Council** passed a 5G cease and desist resolution
- **Warren, Connecticut** Policy defines "adequate coverage" and "adequate capacity." and was designed "to locate towers and/or antennas in a manner which protects property values, as well as the general safety, health, welfare and quality of life of the citizens." Coverage is considered to be "adequate" within that area surrounding a Base Station where the predicted or measured median field strength of the transmitted signal is such that the majority of the time, transceivers properly installed and operated will be able to communicate with the base station.

As an example of CA ordinances, the **Los Altos City ordinance:**

- prohibits installation of small cells on public utility easements in residential neighborhoods
- 500 foot setbacks for small cells for multi-family residences in commercial districts
- 500 ft separation from schools
- 1500 ft separation between nodes

San Diego County, California

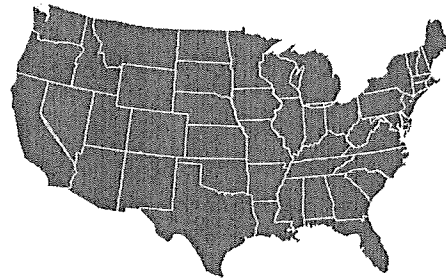
- "SCWs shall not be located within 1,000 feet of schools, child care centers, hospitals, or churches."

INDIANA

Carmel City IN Council

resolution asks state lawmakers, FCC and Congress to limit 5G until health effects fully understood.

[Links to ordinances at ehtrust.org](https://ehtrust.org)



OHIO

- **Mason OH** Zoning Ordinance No small cells in residential areas or within 100 feet of residential prop; 2000 feet apart (unless colocated); equipment should be underground or wholly contained.

OKLAHOMA

- **Sallisaw OK** 1,500 feet setback

TENNESSEE

- **Farragut City** Resolution to halt 5G

FLORIDA

- **Coconut Creek FL** Commission adopted a Resolution on 5G and radiofrequency radiation.
- **Hallandale Beach FL** Resolution urges the federal government to initiate independent health studies on 5G.
- **Lavallette FL** Resolution 2021-58: Applicant shall obtain certification from the Federal Aviation Administration and the United States Dept. of Defense demonstrating that the installation does not emit RF frequencies which may interfere with avionics of any approaching civil or military aircraft." The City also requires the applicant to provide RF meters used by their technicians and train City employees. Verizon cannot install more than a total of 20 "small cell" nodes throughout the Borough to support 5G.

NEW JERSEY

- **Little Silver, NJ** Carriers should provide notice to property owners within 500 feet of proposed facility.
- **City of Jersey City, NJ** Resolution 20-362 calls for local controls re small cells.

5G IS RECKLESS

5G Jumbo Pole at Hester and Eldridge New York City, New York



SCIENTISTS ARE RINGING THE ALARM BELL

Hundreds of scientists are warning that safety is not assured with 5G and cell tower proliferation. They caution that FCC cell tower radiation limits do not protect against long term health effects nor do they consider children's unique vulnerability.

5G and the proliferation of cell towers and cell antennas in close proximity to where people live, work and play is increasing ambient radiofrequency radiation levels.

The Los Angeles California School District Office of Health and Safety developed a "cautionary level" for radiofrequency radiation 10,000 times lower than FCC regulations because, "it is believed that a more conservative level is necessary to protect children, who represent a potentially vulnerable and sensitive population."



INTERNATIONAL ASSOCIATION OF FIRE FIGHTERS

Since 2004, the International Association of Firefighters has officially opposed cell towers on their stations "until a study with the highest scientific merit and integrity on health effects of exposure to low-intensity RF/MW radiation is conducted and it is proven that such sitings are not hazardous to the health of our members."

In California, firefighter unions repeatedly and successfully lobbied state lawmakers to remove fire stations from the list of 5G cell tower fast track sites.

EMF Safety Standards

There was a poster at a recent Telus cell tower presentation detailing their adherence to current Canada Health safety standards, which referred to **Safety Code 6**, dated March 2015. Information on this code is to be found as follows, the first reference leading on to the next two: -

Understanding Safety Code 6: Health Canada's radiofrequency exposure guidelines (10 pages)

<https://www.canada.ca/en/health-canada/services/health-risks-safety/radiation/occupational-exposure-regulations/safety-code-6-radiofrequency-exposure-guidelines.html>

Notice: Localized human exposure limits for radiofrequency fields in the range of 6 GHz to 300 GHz (10 pages)

<https://www.canada.ca/en/health-canada/services/health-risks-safety/radiation/types-sources/radiofrequency-fields/notice-localized-human-exposure-limits-range-6-ghz-300-ghz.html>

Technical Guide for Safety Code 6: Health Canada's Radiofrequency Exposure Guidelines (80 pages or 63 page PDF)

<https://www.canada.ca/en/health-canada/services/environmental-workplace-health/reports-publications/radiation/safety-code-6-health-canada-radiofrequency-exposure-guidelines-environmental-workplace-health-health-canada/technical-guide.html>

There is actually no need to read most of this information as the only part relevant to our own health and safety is to be found under **Conclusions** on the second paper (on page 4 if printed out), which reads as follows: -

"For localized exposures to radiofrequency EMF in the 6 GHz to 300 GHz frequency range, Health Canada is in agreement with ICNIRP that two adverse health effects can occur. These are:

***heat-pain sensation**
thermal tissue damage*

Health Canada is also in agreement with ICNIRP regarding the threshold temperature for the occurrence of these effects.

Based on a number of worst-case assumptions built into Health Canada's computational modelling, Health Canada determined that application of the ICNIRP limits is justified with certain modifications in order to address a wider range of exposure scenarios. These modifications would further restrict maximal localized tissue temperature increases to levels which are below the thresholds for heat-pain sensation or thermal tissue damage."

This is followed by a table of **Basic restrictions for local electromagnetic field exposure above 6 GHz up to 300 GHz**, which gives $20\text{W}/\text{m}^2$ (watts per square metre) for a period not exceeding 6 minutes as the maximum exposure in an "Uncontrolled Environment".

A note on ICNIRP, the organisation referred to above: ICNIRP is short for the International Commission for Non-ionizing Radiation Protection which is an invite only, self-appointed club of just 14 members with longstanding industry ties that has no oversight and is accountable to no one. For more information, visit <https://ehtrust.org/icnirp-the-international-commission-on-non-ionizing-radiation-protection-deep-industry-ties-no-oversight-and-only-14-members/>

So Health Canada is basing its EMF safety standards purely on thermal considerations, which was the state of understanding shortly after the end of World War II, nearly 80 years ago. It does not

published since the War, concluding that exposures down to the $\mu\text{W}/\text{m}^2$ (micro-watts per square metre) level are harmful. (By the way, 1 watt = 1 million micro-watts). This means that Health Canada's Safety Code allows radiation levels **millions** of times more than those which have been observed to cause harm. It also refers only to short-term exposure and makes no reference to long-term exposure, which has been found to be even more harmful. The only place ordinary folks are likely to encounter where the EMF level would exceed this "Safety Code" is the inside of a microwave oven, turned on. **Safety Code 6 provides no actual protection at all.**

For a comparison of International and some other safety standards, see Safe Living Technologies' guide **International Radio Frequency "RF" Exposure Limits**, to be found at <https://safelivingtechnologies.com/rf-exposure-guidelines>. Canada's safety limits are indeed lower than those of most of Europe and the US but that is not saying much.

For further information on some of the recent studies on the health effects of EMF exposure, see Arthur Firstenberg's *Radio Wave Packet - What You Need to Know about Wireless Technology*, to be found at <https://sleepeasy.krtra.com/c/CDMT9ZHKyNYf/rJPP>, link received courtesy of Cathy Cooke (<https://wholehomeandbodyhealth.com/>)

CELL TOWER RF RADIATION AND CANCER

International Agency for Research on Cancer



World Health
Organization

PRESS RELEASE
N° 208

31 May 2011

IARC CLASSIFIES RADIOFREQUENCY ELECTROMAGNETIC FIELDS AS POSSIBLY CARCINOGENIC TO HUMANS

Lyon, France, May 31, 2011 -- The WHO/International Agency for Research on Cancer (IARC) has classified radiofrequency electromagnetic fields as possibly carcinogenic to humans (Group 2B), based on an increased risk for glioma, a malignant type of brain cancer¹, associated with wireless phone use.

The World Health Organization International Agency for Research on Cancer Classified Radiofrequency Radiation as a "Possible" Carcinogen in 2011

In 2011, radiofrequency electromagnetic fields (RF-EMF) were classified as a Group 2B possible carcinogen by the World Health Organization's International Agency for Research on Cancer (WHO/IARC).

The WHO/IARC scientists clarified that this determination was for RF-EMF from any source be it cell phones, wireless devices, cell towers or any other type of wireless equipment.

Since 2011, the published peer-reviewed scientific evidence associating RF-EMF (also known as RF-EMR and RFR) to cancer and other adverse effects has significantly increased.

A large-scale animal study published in Environmental Research found rats exposed to RF levels comparable to cell tower emissions had elevated cancers, the very same cancers also found in the US National Toxicology Program animal study of cell phone level RF that found "clear evidence" of cancer in carefully controlled conditions (Falcioni 2018).

In 2019, the WHO/IARC advisory committee recommended that radiofrequency radiation be re-evaluated as a "high" priority in light of the new research. The date of the re-evaluation has not been set.

Currently, several scientists conclude that the weight of currently available, peer-reviewed evidence supports the conclusion that radiofrequency radiation is a proven human carcinogen (Hardell and Carlberg 2017, Peleg et al. 2022, Miller et al. 2018).

5G, Your Health And The Environment



WHAT IS 5G?

5G is the fifth generation of wireless technology promising to connect the Internet of Things (IoT) at blazing fast speeds. Millions of new cell antennas are being installed in front of homes on street lights and utility poles. Telecom has heavily lobbied governments to pass new regulations that fast track new wireless antenna installations by removing public notice and public hearings and usurp local control.

Issues With 5G

- Experimental technology
- Increases radiation exposure
- Outdated radiation guidelines
- Children are more vulnerable
- Inadequate regulations
- Impact to tree canopy
- No oversight by health authority
- No environmental review
- Increases energy usage
- Increases e-waste and pollution
- Lowers property values
- Local authority overruled
- Loss of privacy
- Interferes with weather forecasting
- Screen addiction
- Uninsured liability
- Cyber security risks

Peer Reviewed Research On Wireless Radiation

- Sperm damage
- Oxidative stress
- Altered brain development
- DNA damage
- Immune system damage
- Memory problems
- Sleep problems
- Hyperactivity
- Behavior problems
- Breach of blood-brain barrier
- Brain tumors
- Cancer
- Harm to birds, bees, and trees

Harvard Investigation Finds Industry Funding Influences Science and Policy

"Industry control, in the case of wireless health issues, extends beyond Congress and regulators to basic scientific research."
— Norm Alster, in *Captured Agency*, Harvard University

Medical Doctors Caution

"An Egyptian study confirmed concerns that living nearby mobile phone base stations increased the risk for developing headaches, memory problems, dizziness, depression and sleep problems. In large studies, an association has been observed between symptoms and exposure to these fields in the everyday environment."
— *The American Academy of Pediatrics*

Scientists Worldwide Are Calling For A Halt To 5G

"We recommend a moratorium on the roll-out of the fifth generation, 5G, for telecommunication until potential hazards for human health and the environment have been fully investigated by scientists independent from industry...RF-EMF has been proven to be harmful for humans and the environment."
— *The 5G Appeal (signed by over 250 independent scientists and medical doctors from 40 countries)*

Worldwide Opposition

Governments are taking action to stop 5G. Dozens of cities in Italy, the U.K., the U.S. and Switzerland are passing resolutions/restrictions to halt the 5G roll-out until adequate safety testing has been done. Several countries recommend reducing children's exposures to cellular phone radiation.



5G, CELL TOWERS AND WIRELESS LEGAL & LIABILITY ISSUES



When a new cell tower is proposed, the first question to ask is: "Do you have insurance for damages from long-term exposure to the radiofrequency radiation (RFR)?"

Usually the answer is "No." Why? Insurance companies rank the risk as "HIGH."

5G and Cell Towers Are an Uninsurable Risk

- Insurers rank wireless, cell tower, and 5G RFR non-ionizing electromagnetic field (EMF) radiation as a "high" risk, comparing the issue to lead and asbestos.
- Most insurance plans have "electromagnetic field exclusions" and do not insure for long-term RFR damages.
- Additionally, some insurance plans will not provide a defense for any supervision instruction or recommendation given "or which should have been given" in connection to EMFs.
- Wireless RFR and non-ionizing electromagnetic radiation are defined as a type of "pollution" by wireless companies themselves.
- U.S. mobile operators have been unable to get insurance to cover liabilities related to damages from long-term RFR exposure.
- Wireless companies warn their shareholders of RFR risk but do not warn users of their products, nor do the companies warn the people exposed to emissions from their infrastructure.

QUESTIONS + ANSWERS

Q1: Are Cell Towers and Wireless Radiation Safe?

A: **NO**, they haven't been proven safe. Try to cite a non-industry funded study.

Q2: Is Telecom or the Gov't doing any safety studies on 5G before they roll it out?

A: **None** - ask them yourself.

Q3: How long was Health Canada Safety Code 6 (HCSC6) tested for?

A: **6 minutes** - look it up, table 5.

Q4: How many studies did HC use and what was the longest test?

A: 10 studies and the longest test was done for 30 minutes. So, how can HC say it's safe 24-7?

Q5: Is there evidence of biological harm at levels lower than HCSC6?

A: Yes, hundreds of scientific papers exist.

Q6: Are children protected?

A: **No**, the model used to test safety (SAR Value) was a 6-foot adult male! Children are more vulnerable, as they are smaller and absorb RFR deeper into their brains and bodies. And they are exposed for a longer period over their lifetime.

Q7: Are birds, bees, trees and the environment protected?

A: **No**, SC6 is only applicable to humans. Canada does not have any RF/EMF safety guidelines for birds, bees, trees or the environment!

Q8: Are there liability concerns?

What if harm occurs, who is responsible?

A: **YES** - **there are major liability concerns! There are RF/EMF policy exclusions. Shareholders are warned but not the public.**

Q9: Does our Gov't measure, monitor and publish RFR levels online? A: Ask them. Switzerland, Belgium and Austria are just a few countries that do.

Safety can no longer be assumed.

WHAT YOU CAN DO

- **EDUCATE YOURSELF**
- **WRITE TO THE PROPONENT BRIAN GREGG BY DEC 4, 2023 (see below)**
- **WRITE TO THE CITY OF COURTENAY**

1. WRITE to the Proponent BEFORE end of business day Mon, Dec 4, 2023.

RE: BC112114 - Courtenay to TELUS' Representative Brian Gregg, SitePath Consulting Ltd. PO Box 20138, Vancouver RPO, Fairview, BC V5Z 0C1 Ph: 778-870-1388 Email:

BrianGregg@SitePathConsulting.com

If you are opposed to this installation, it's important to state that for the record.

2. CONTACT + WRITE to the City of Courtenay and ask that the Mayor & Councilors do NOT issue a statement of concurrence for the proposed replacement tower (TELUS).

You can write until just before they meet and vote. If you are opposed to this installation, it's important to state that for the public record.

LEARN - Check Out Ample Evidence of Harm:

<https://bioinitiative.org/table-of-contents/>

<https://ehtrust.org/science>

<https://www.emf-portal.org/en>

Search 'PhoneGate Canada'

Canadian Class Action Lawsuit against Apple & Samsung

To sign a petition or to learn more, contact **VISafeTechAlliance@proton.me**

ARE CELL TOWERS + WIRELESS RADIATION SAFE FOR BEES, BIRDS, TREES?

November 6, 2023

As part of the rollout of 5G connectivity, cell towers and small cell antennas are popping up across Canada.

In the Comox Valley, three (3) cell towers have been proposed in the Agricultural Land Reserve:

- **NEW 5G Tower:** 1351 Larkin Road (beside Williams Beach Rd), Courtenay (CVRD Area C).
- 1388 Ellenor Road, Comox (CVRD Area B)
- 3505 Dove Creek Road, Courtenay (CVRD Area C)

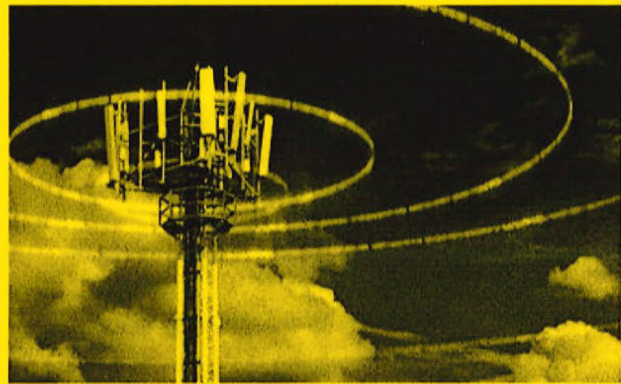
What's the Concern?

Radiofrequency radiation (RFR) from cell towers has not been proven safe for people, animals, birds, insects, and trees. Birds and bats can also have collisions with towers, which can prove deadly.

While researchers used to think that the non-ionizing RFR emitted by cell antennas and wireless devices was too weak to cause harmful biological effects, we now have ample evidence linking low intensity cumulative RFR exposure to DNA damage, cancer & tumours, mitochondrial damage, lowered sperm count and infertility, miscarriages, sleep disorders, memory and cognitive problems, headaches, migraines, damage to the blood-brain barrier, tinnitus, diabetes, heart palpitations, neurological disorders, and more.

<https://bioinitiative.org/table-of-contents/>

Safety can no longer be assumed.



Radiofrequency Radiation and Your Health: Is 5G Harmful? Dr. Joel Moskowitz Federal Mobility Group Webinar

<https://ehtrust.org/radiofrequency-radiation-and-your-health-is-5g-harmful-dr-joel-moskowitz-federal-mobility-group-webinar/>

Two Recent Reviews:

"Evidence for a Health Risk by RF on Humans Living Around Mobile Phone Base Stations: From Radiofrequency Sickness to Cancer"
[base stations = cell towers]

<https://pubmed.ncbi.nlm.nih.gov/35843283/>

Extract: "Overall results of this review show three types of effects by base station antennas on the health of people: radiofrequency sickness (RS), cancer (C) and changes in biochemical parameters (CBP)."

"Effects of Non-Ionizing Electromagnetic Fields on Flora and Fauna, Part 1. Rising Ambient EMF Levels in the Environment" (3 part review, close to 1000 references)

<https://pubmed.ncbi.nlm.nih.gov/34047144/>

Extract: "Broad wildlife effects have been seen on orientation and migration, food finding, reproduction, mating, nest and den building, territorial maintenance and defense, and longevity and survivorship. Cyto- and geno-toxic effects have been observed."

<https://ehtrust.org/science>

<https://wirelessenviroimpacts.science>

<https://www.emf-portal.org/en>



*"We can no longer assume
that any current or future
wireless technology,
including 5G, is safe without
adequate testing"*

*Dr. Ronald Melnick, PhD,
U.S. National Toxicology
Program*

Canada's Radiofrequency (RF) Electromagnetic Frequencies (EMF) guideline is called Health Canada Safety Code 6 (HCSC6). It is for humans only and the length of the test was 6 minutes! **Canada does not have ANY RF / EMF safety guidelines for birds, pollinators, animals or the environment!**

EDUCATE YOURSELF

To Learn More about safe alternatives to wireless and how we can work together to protect our health, our farms, wildlife, and the environment, please email us at

VISafeTechAlliance@proton.me

VISTA was formed by a small group of concerned Comox Valley residents in November 2022, and our membership has rapidly expanded to include others facing a similar threat on Cortes, Hornby, Mayne, Salt Spring Island, Qualicum Beach and other nearby communities.

We believe in safe technology. No long-term safety testing of 5G has been done. Hundreds of independent scientists around the world have signed appeals calling for a moratorium on the rollout of 5G until scientists independent from industry can fully investigate the potential hazards for human health and the environment.

Let's learn from the examples of cigarette smoking, asbestos, DDT, lead, mercury, thalidomide, and other harmful agents that were presumed safe — until they weren't.



TAKE ACTION

1) WRITE to the CVRD Area Directors and ask that they do NOT issue a statement of concurrence for the proposed towers (ROGERS + TELUS). You can write up until they meet and vote. **If you are opposed to these installations, it's important to state that.**

Edwin Grieve, Area Director (Area C) Proposed ROGERS 63 Meter Tower at 1351 Larkin Road (**Reference: W6699 - Williams Beach**) + TELUS 62 Meter Tower at 3505 Dove Creek Road, Courtenay (**Reference: BC109300 - Dove Creek**).
Tel: 250-337-8558, Cell: 250-218-1385
Email: EdwinGrieve@shaw.ca

Rich Hardy, Area Director (Area B) - Proposed TELUS 43 Meter Tower at 1388 Ellenor Road, Comox (**Reference: BC109528 - Little River**)
Tel: 250-703-1969
Email: RichHardyAreaB@gmail.com

Daniel Arbour, Area Director (Area A) - Proposed ROGERS 63 Meter Tower on **Hornby Island** (Provincial Crown Land) Note: Islands Trust is the voting party for Hornby Island, not the CVRD.
Tel: 250-650-8480
Email: ReachMe@danielarbour.ca

2) To sign a PETITION for any of the above noted towers, email us at:
VISafeTechAlliance@proton.me

3) If Q's: Write to the CVRD City Planners

Re W6699 – **Williams Beach: Stephanie Pawluk**, Planner II 250-898-3727 spawluk@comoxvalleyrd.ca

Re: BC109300 - **Dove Creek** + BC109528 - **Little River: Dylan Thiessen**, Policy and Planning Analyst, Planning & Development Services 250-334-6098
dthiessen@comoxvalleyrd.ca

Also check out PhoneGate Canada - a Class Action Lawsuit against Apple and Samsung

<https://phonegatealert.org/en/class-action-apple-samsung/>

<https://phonegatealert.org/en/phonegate-canada-denial-of-transparency-by-health-canada/>

Have Cell Towers been Proven Safe?

Sadly, the answer is NO!

5G has not been proven safe, nor have previous generations of wireless technology that are surround by local businesses, shopping areas, residences and farms.

Believe it or Not, there is reason for concern.

Radio frequency radiation (RFR) from cell towers has not been proven safe for people, animals, birds, insects, and trees. Birds and bats can also have collisions with towers, which can prove deadly. While researchers used to think that the non-ionizing RFR emitted by cell antennas and wireless devices was too weak to cause harmful biological effects, we now have ample evidence linking low intensity cumulative RFR exposure to DNA damage, cancer & tumours, mitochondrial damage, lowered sperm count and infertility, miscarriages, sleep disorders, memory and cognitive problems, headaches, migraines, damage to the blood-brain barrier, tinnitus, diabetes, heart palpitations, neurological disorders, and more.

Safety can no longer be assumed.

Let's learn from the examples of cigarette smoking, asbestos, DDT, lead, mercury, thalidomide, and other harmful agents that were presumed safe — until they were not.

<https://MDSafeTech.org/science/>

<https://EHTrust.org/science>

<https://www.emf-portal.org>

Send written comments in regards to the new proposed 46-0 m cell tower at:

1000 Piercy Ave by end of day [redacted] 2025 to BrianGREGG@sitepathconsulting.com 778-870-1388.

For more information, see p. 34 of July 2 + July 9 Comox Valley Record e-edition.

City of Courtenay Planning Division 250 703-4839

Write or call the Mayor + Councillors 250 334-4441

mayor@courtenay.ca wcole-hamilton@courtenay.ca dfrisch@courtenay.ca dhillian@courtenay.ca ejolicoeur@courtenay.ca mmccollum@courtenay.ca wmorin@courtenay.ca

From: [Marion](#)
To: [Proton, Adriana](#); [Matthews, Rayanne](#)
Subject: Fw: re: proposed cell tower at 1000 Piercy Ave.
Date: Monday, September 22, 2025 8:46:59 AM

Sent with [Proton Mail](#) secure email.

----- Forwarded Message -----

From: Marion <[REDACTED]>
Date: On Wednesday, September 10th, 2025 at 12:37 PM
Subject: re: proposed cell tower at 1000 Piercy Ave.
To: mayor@courtenay.ca <mayor@courtenay.ca>, dfrisch@courtenay.ca <dfrisch@courtenay.ca>, ejolicoeur@courtenay.ca <ejolicoeur@courtenay.ca>, mmccollum@courtenay.ca <mmccollum@courtenay.ca>, dbeatson@courtenay.ca <dbeatson@courtenay.ca>, planning@courtenay.ca <planning@courtenay.ca>, jschile@courtenay.ca <jschile@courtenay.ca>, ggarbutt@courtenay.ca <ggarbutt@courtenay.ca>, Hillian, Doug <dhillian@courtenay.ca>, Cole-Hamilton, Will <wcole-hamilton@courtenay.ca>, Morin, Wendy <wmorin@courtenay.ca>

Hello again,

I think this is email number 6, or is it seven? I'm losing track now. Still haven't had a single reply from any of you to answer my questions or acknowledgement that someone ready my hard copy information package. Still waiting...

So I watched the June 11, 2025 council meeting again. The proposed cell tower was on the agenda. Here are some questions that arose in my mind while watching it:

- Mrs. Schile keeps talking about the community "needing" this cell tower. How did she arrive at this conclusion? Is her cell phone dropping calls? Her friend's cell phone? People calling city hall and demanding better cell service? Or one of the councilor's wife complaining to him? Or did Telus tell her that Courtenay "needs" this cell tower right in the middle of the residential area?
- Also, there is talk about "safety" reasons for building this cell tower. Please elaborate.
- It was also mentioned that there are two public consultations that need to take place. Telus did their usual "show and tell" and not giving answers to our pertinent questions. When and where was the required City council consultation with the public? Was there an open house I missed? Or do you define public consultation as putting an ad in the paper (that hardly anyone reads anymore), telling people they can email and then completely ignoring these emails? Here is the definition of

consulting: the activity or business of giving expert advice about a particular subject; discussion. Whom did you consult with from the public? When, where and how? What was said?

- How much is Telus paying you for letting them use city land?
- Why was there zero mention of the health impacts on residents if this tower should be built? Brian Gregg and a council member talk about a heritage site and Telus offering to paint the pole green to blend in. Not once did anyone question the safety of this cell tower.
- What about liability? When people suffer ill effects of this tower, who can they turn to for help and compensation? Will the councilors who voted in favour of this tower pay for people's medical bills, or, as in my case, moving costs? Who can people sue if their child ends up with a brain tumour?

More general questions:

- Why is nobody at city Hall replying to my emails or the hard copy information package I dropped off at the City Hall front desk over a week ago.
- If, against better judgment, the city goes ahead and approves this tower, how can citizens appeal this decision?
- Why are the comments on your YouTube channel recording of council meetings turned off? I ask you to turn them on. Don't you want to know what the people that elected you think about your decisions?

I'm not blind or stupid. I can see very clearly that you all want this cell tower and are doing everything you can to make this happen. I'll give you all the benefit of the doubt and assume that you really think you are doing us a favour. You really **are** completely unaware of the dangers of EMF, cell tower radiation 5 and 6G and all the current research on this topic. However, I and others in the community have been sending you information to raise awareness of these issues. What you are displaying now is willful ignorance. You cannot claim that you didn't know of the harms. When people suffer, they will ask you why you knowingly put them in harm's way.

It is actually mind-boggling to me that you choose to ignore this issue. Do you think we are all tinfoil hatters? That scientists have written hundreds of articles and books about the dangers involved in the unchecked deployment of this technology are all nutters? Do you believe that you, your children, parents, loved ones, are somehow immune to this?

Well, against my better judgement, I'll await your answers. Discussions and consultation are welcome!

Marion Hoerberg

Sent with [Proton Mail](#) secure email.

From: [Proton, Adriana](#)
To: [Marion](#); [Wells, Bob](#); [Frisch, David](#); [Jolicoeur, Evan](#); [McCollum, Melanie](#); [Beatson, Dana](#); [PlanningAlias](#); [Schile, Jamai](#); [Garbutt, Geoff](#); [Hillian, Doug](#); [Cole-Hamilton, Will](#); [Morin, Wendy](#); [Matthews, Rayanne](#)
Subject: RE: variance application for DVP00064-DVP 2503 -1000 Piercy Ave.
Date: Monday, September 22, 2025 8:52:37 AM

Hi Marion,

Just to clarify, the Board of Variance is not the body that will make a decision on this Development Variance Permit. They are responsible for minor variances due to hardship, which is a different process. This DVP application is going to Council.

Kind regards,

Adriana Proton, MPA, CRM
Manager of Legislative Services

T 250-703-4837

From: Marion <[REDACTED]>

Sent: Monday, September 22, 2025 8:03 AM

To: Wells, Bob <mayor@courtenay.ca>; Frisch, David <dfrisch@courtenay.ca>; Jolicoeur, Evan <ejolicoeur@courtenay.ca>; McCollum, Melanie <mmccollum@courtenay.ca>; Beatson, Dana <dbeatson@courtenay.ca>; PlanningAlias <planning@courtenay.ca>; Schile, Jamai <jschile@courtenay.ca>; Garbutt, Geoff <ggarbutt@courtenay.ca>; Hillian, Doug <dhillian@courtenay.ca>; Cole-Hamilton, Will <wcole-hamilton@courtenay.ca>; Morin, Wendy <wmorin@courtenay.ca>; Proton, Adriana <aproton@courtenay.ca>; Matthews, Rayanne <rmatthews@courtenay.ca>

Subject: re: variance application for DVP00064-DVP 2503 -1000 Piercy Ave.

Good morning,

I've looked at the website of the board of variance and this is what I discovered:

The board cannot:

- Change land use or density limits.
- **Approve developments that negatively impact the natural environment.**
- **Approve changes that significantly affect neighbouring properties.**

<https://www.courtenay.ca/business-and-building/planning-and-land-use/board-variance>

I can very much prove that this tower will negatively impact the natural environment. I live in it and it will negatively affect me and many others, as I pointed out in my numerous previous emails.

Also, as more and more people become aware of the negative impact of cell towers, people will simply not buy a property close to such a tower, which means a financial loss for home owners in the area.

To support my claims, here is a wide sampling of resources for you to read and listen to. I know it's only nine more days until the council meeting, but they had over a year to inform the public and let us state our case, but failed to do so. Now everything is a big rush. Telus and city council want to finish building this tower by the end of this year!!!

If the information below is not enough to make you pause, let me know. I have many, many more studies at hand.

Issues with Safety code 6, which is the **only** guideline Telecommunications has to follow, and which Bob Wells said is what he follows. People have been trying for years to update this outdated study. See **attachment** and the links below:

<https://lobbycanada.gc.ca/app/secure/ocl/lrs/do/vwRg?cno=327526@Id=802531>

<https://lobbycanada.gc.ca/app/secure/ocl/lrs/do/vwRg?cno=319745@Id=772329>

Lawsuits/legal actions against 5G, cell towers, cell phones:

<https://citizensforsafertech.ca/>

<https://www.appel5gappeal.ca/>

https://emrabc.ca/?page_id=5243

<https://www.naturalhealth365.com/legal-shockwaves-lawsuit-alleges-verizon-cell-tower-caused-life-threatening-cardiac-events.html>

<https://mdsafetech.org/legal-issues-and-cell-towers/>

CHD Sues AT&T on Behalf of Woman Who Alleges Cell Tower Caused 51 Strokes:

<https://childrenshealthdefense.org/defender/chd-lawsuit-cell-tower-wireless-radiation-51-strokes-marcia-haller/>

<https://www.takebackyourpower.net/5g-swiss-telcos-ignore-laws-and-launch-5g-rule-of-law-under-attack/>

<https://mdsafetech.org/5g-telecommunications-science/>

A documentary about wireless radiation and impacts on humans and the environment

<https://c4st.org/evictedbywireless/>

<https://radiation dangers.com/cell-towers/outstanding-list-of-studies-regarding-cell-towers-causing-cancer-and-other-illnesses/>

Impact of radiofrequency radiation on DNA damage and antioxidants in peripheral blood lymphocytes of humans residing in the vicinity of mobile phone base stations:

https://www.tandfonline.com/doi/abs/10.1080/15368378.2017.1350584?_cf_chl_tk=DXMOGOK1uBqKn0Dd1aUF_4zNsZMvUsXIxzDB0T0gG.E-1758150232-1.0.1.1-0CkMyzA15Ra06sQrCXUnKsmH_6JKsFMV1kqMdzqN.4U

The Effect of Continuous Low-Intensity Exposure to Electromagnetic Fields from Radio Base Stations to Cancer Mortality in Brazil

<https://www.mdpi.com/1660-4601/18/3/1229>

Biological effects from exposure to electromagnetic radiation emitted by cell tower base stations and other antenna arrays

<https://cdnsiencepub.com/doi/10.1139/A10-018#sec-13>

Something Is In The Air - The cell phone radiation documentary

<https://youtu.be/Q89Gv2P3RH8>

Cell Tower Developers ‘Lying’ About Coverage Gaps to Push New Towers, Lawyer Says
SEPTEMBER 19, 2025

<https://jellyfish.news/cell-tower-developers-lying-about-coverage-gaps-to-push-new-towers-lawyer-says/>

<https://childrenshealthdefense.org/defender/cellphone-radiation-abnormal-blood-cells-rouleaux-formation/>

Thank you for your time,

Marion Hoerberg

GUIDE TO HEALTH CANADA SAFETY CODE 6 ETC

VISTA Proton Drive Folder_HC Safety Code 6 Etc <https://drive.proton.me/urls/0AF7WCGAFC#0a01y0QB7PHI>

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GUIDE TO HEALTH CANADA SAFETY CODE 6 ETC

VISTA Proton Drive Folder_HC Safety Code 6 Etc <https://drive.proton.me/urls/0AF7WCGAFC#0a01y0QB7PHI>

Government of Canada Links

Safety Code 6

<https://www.canada.ca/en/health-canada/services/health-risks-safety/radiation/occupational-exposure-regulations/safety-code-6-radiofrequency-exposure-guidelines.html>

<https://www.canada.ca/en/health-canada/services/publications/health-risks-safety/limits-human-exposure-radiofrequency-electromagnetic-energy-range-3-300.html>

<https://www.canada.ca/en/health-canada/services/health-risks-safety/radiation/everyday-things-emit-radiation/wi-fi.html>

CPC 2-0-03

<https://ised-isde.canada.ca/site/spectrum-management-telecommunications/en/learn-more/key-documents/procedures/client-procedures-circulars-cpc/cpc-2-0-03-radiocommunication-and-broadcasting-antenna-systems>

[Note: ISED via CPC 2-0-03 claims that health concerns and the risk of decreased property values are not 'reasonable concerns'.]

Health Canada acknowledges that two adverse health effects can occur: heat-pain sensation and thermal tissue damage

<https://www.canada.ca/en/health-canada/services/health-risks-safety/radiation/types-sources/radiofrequency-fields/notice-localized-human-exposure-limits-range-6-ghz-300-ghz.html>

The screenshot shows the top of a Health Canada website page. At the top left is the Canadian flag and the text 'Government of Canada' and 'Gouvernement du Canada'. To the right is a search bar with the text 'Search Canada.ca' and a magnifying glass icon. Below the search bar is a 'MENU' dropdown button. The breadcrumb trail reads: 'Canada.ca > Health > Health risks and safety > Radiation and your health > Types and sources of radiation > Radiofrequency electromagnetic fields (EMF)'. The main heading of the page is 'Notice: Localized human exposure limits for radiofrequency fields in the range of 6 GHz to 300 GHz', with the date 'January 2021' below it.

Conclusions

For localized exposures to radiofrequency EMF in the 6 GHz to 300 GHz frequency range, Health Canada is in agreement with ICNIRP that **two adverse health effects can occur**. These are:

heat-pain sensation

thermal tissue damage

Health Canada is also in agreement with ICNIRP regarding the threshold temperature for the occurrence of these effects.

Based on a number of worst-case assumptions built into Health Canada's computational modeling, Health Canada determined that application of the ICNIRP limits is justified with certain modifications in order to address a wider range of exposure scenarios. These modifications would further restrict maximal localized tissue temperature increases to levels

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which are below the thresholds for heat-pain sensation or thermal tissue damage.

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How Did Health Canada Determine Wireless Radiation is Safe for everyone 24-7?

Health Canada (HC) makes a claim that wireless radiation is safe for everyone, 24 hours a day, 7 days a week but the test length was only 6 minutes (table 5). How does that math work? We don't know - see the response members of Vancouver Island Safe Tech Alliance (VISTA) got from a Freedom of Information request:

Original Request for Information: Regarding any studies that HC used to make their Safety Code 6 claim of safety for anyone to continuously be exposed to multiple sources of RF-EMR, including 5G - this includes any studies conducted by Health Canada or by someone else. I am requesting a comprehensive list [including the author(s) name(s), date, study title, journal name where the study was published and a url link] to the references used in those studies.

HC Response: "Having completed a thorough search, we regret to inform you that we were unable to locate any records responsive to your request; no such list exists." - Office of the Information Commissioner of Canada



Health Canada Santé Canada
Access to Information and Privacy Division
7th Floor, Suite 700, Holland Cross - Tower B
1600 Scott Street, (Mail Stop: 3107A)
Ottawa, Ontario K1A 0K9

November 16, 2023

[Via Email](#)

Our file: A-2023-000889 / JS3

This is in response to your request made under the *Access to Information Act* (the Act) for the following information:

"(Regarding any studies that HC used to make their Safety 6 claim of safety for anyone to continuously be exposed to multiple sources of RF-EMR, including 5G - this includes any studies conducted by Health Canada or by someone else) - I am requesting a comprehensive list [including the author(s) name(s), date, study title, journal name where the study was published and a url link] to the references used in those studies."

Having completed a thorough search, we regret to inform you that we were unable to locate any records responsive to your request; no such list exists.

EMF Safety Standards Article by community member re Health Canada Safety Code 6

<https://drive.proton.me/urls/MY1DM1FYSR#LerQ9p29qghE>

Health Canada Safety Code 6 - ISSUES

Health Canada's Radiofrequency (RF) Electromagnetic Frequencies (EMF) guideline is called Health Canada Safety Code 6 (SC6). It is only a guideline. is intended for humans only and the length of the test was 6 minutes (see table 5)!

Canada does not have ANY RF / EMF safety guidelines for birds, pollinators, animals or the environment! Cell towers emit radiation 24/7. SC6 Guidelines were created in the 1990's - before the invention of smart phones and 5G. SC6 was originally

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applicable to individuals working at or visiting federally regulated sites. There were no biologists, medical doctors or specialists who are trained in the biological effects on the Health Canada team.

In 2013 Health Canada admits Safety Code 6 guideline for cell tower microwave radiation is based ONLY on thermal effects, before Superior Court of Quebec. Biological effects are NOT considered.

How Long is Safety Code 6 (2015) - Six Minutes?!

<https://www.canada.ca/en/health-canada/services/publications/health-risks-safety/limits-human-exposure-radiofrequency-electromagnetic-energy-range-3-300.html>

Using above link, search Table 5. The following is a marked up version, image credit: Marg Friesen, M.Sc.

Safety Code 6 (2015) – Power Density

Health Canada / Santé Canada

Your health and safety... our priority. / Votre santé et votre sécurité... notre priorité.

Limits of Human Exposure to Radiofrequency Electromagnetic Energy in the Frequency Range from 3 kHz to 300 GHz

<https://www.canada.ca/en/health-canada/services/publications/health-risks-safety/limits-human-exposure-radiofrequency-electromagnetic-energy-range-3-300.html>

Table 5. Reference Levels for Electric Field Strength, Magnetic Field Strength and Power Density in Uncontrolled Environments

Frequency (MHz)	Electric Field Strength (E _{RL}), (V/m, RMS)	Magnetic Field Strength (H _{RL}), (A/m, RMS)	Power Density (S _{RL}), (W/m ²)	Reference Period (minutes)
10 - 20	27.46	0.0728	2	6
20 - 48	58.07 / f ^{0.25}	0.1540 / f ^{0.25}	8.944 / f ^{0.5}	6
48 - 300	22.06	0.05852	1.291	6
300 - 6000	3.142 f ^{0.3417}	0.008335 f ^{0.3417}	0.02619 f ^{0.6834}	6
6000 - 15000	61.4	0.163	10	6
15000 - 150000	61.4	0.163	10	616000 / f ^{1.2}
150000 - 300000	0.158 f ^{0.5}	4.21 × 10 ⁻⁴ f ^{0.5}	6.67 × 10 ⁻⁵ f	616000 / f ^{1.2}

Frequency, f, is in MHz.

Doubled in January, 2021 to 20 W/m²

Red and yellow markings added

Based ONLY on “over-heating” of body tissue by no more than 1C within a period of 6 minutes. The assumption is that if it does not over-heat (within 6 minutes), this radiation will not harm.

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Health Canada published a Localized Limits Notice in 2015

Health Canada (HC) Analysis-of-Recommendations-above-6-Ghz

<https://drive.proton.me/urls/FSEEJXPRZ0#NlrB0WfykyHS>

HC Analysis of recommended localized human exposure limits for radiofrequency fields in the frequency range from 6 GHz to 300 GHz

<https://drive.proton.me/urls/PFW3H5TZAG#KodtDXJG5XGp>

https://preventcancer.ca/wp-content/uploads/2022/02/Analysis-of-Recommendations-above-6-GHz_FINAL-Feb-2-2021.pdf

Note: This report is only available via request. Image Credit: Marg Friesen, M.Sc.

**January 2021:
Evidence used to support
the “complement” to
Safety Code 6 that doubled
human exposure limits for
5G devices:**

- The only effects on humans relied on were “over-heating” effects and pain sensation. Studies (10) were 30 minutes or less exposure time.
- All animal studies (12) were short term studies and none were considered to be of “high quality.”
- Findings from tissue and cell studies were excluded from the analysis.

Health Canada Santé Canada

4.0 Assessment of potential adverse health effects from exposure to RFEMF at frequencies from 6 to 300 GHz

Consumer & Clinical Radiation Protection Bureau, Health Canada
775 Brookfield Road, Ottawa, ON, Canada, K1A 1C1

Summary of evidence:
Human Studies:
Of the 10 identified studies on human responses to RFEMF in the 6 to 300 GHz frequency band, most have been conducted by two research groups and have focussed on skin temperature changes and the threshold of perceived warmth and heat pain sensation. The human studies were identified that assessed endpoints such as cancer, ocular effects, reproductive system effects, cognitive effects, impacts on the immune system, non-specific symptoms or any other adverse health outcomes in response to exposure to RFEMF in the 6-300 GHz frequency range. The included studies on human outcomes are outlined in Table 4.1.

Page 32.

No human studies were identified that assessed endpoints such as cancer, ocular effects, reproductive system effects, impacts on the immune system, non-specific symptoms or any other adverse health outcome

...

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Scientific Studies reporting potential harm below Safety Code 6 (2015)

References of over 200 scientific studies and six (6) reviews reporting **potential harm** at non-thermal (not heating) levels of radiofrequency/microwave radiation that are **below Safety Code 6** (2015) - Canadians for Safe Technology (C4ST)

<https://drive.proton.me/urls/AD871044C0#vxkTcpiX8Fw>

Scientific evidence invalidates health assumptions underlying the FCC and ICNIRP exposure limit determinations for radiofrequency radiation: implications for 5G

<https://pubmed.ncbi.nlm.nih.gov/36253855>

<https://ehjournal.biomedcentral.com/articles/10.1186/s12940-022-00900-9>

ABSTRACT: In the late-1990s, the FCC and ICNIRP adopted radiofrequency radiation (RFR) exposure limits to protect the public and workers from adverse effects of RFR. These limits were based on results from behavioral studies conducted in the 1980s involving 40–60-minute exposures in 5 monkeys and 8 rats, and then applying arbitrary safety factors to an apparent threshold specific absorption rate (SAR) of 4 W/kg. The limits were also based on two major assumptions: any biological effects were due to excessive tissue heating and no effects would occur below the putative threshold SAR, as well as twelve assumptions that were not specified by either the FCC or ICNIRP. In this paper, we show how the past 25 years of extensive research on RFR demonstrates that the assumptions underlying the FCC's and ICNIRP's exposure limits are invalid and continue to present a public health harm. Adverse effects observed at exposures below the assumed threshold SAR include non-thermal induction of reactive oxygen species, DNA damage, cardiomyopathy, carcinogenicity, sperm damage, and neurological effects, including electromagnetic hypersensitivity. Also, multiple human studies have found statistically significant associations between RFR exposure and increased brain and thyroid cancer risk. Yet, in 2020, and in light of the body of evidence reviewed in this article, the FCC and ICNIRP reaffirmed the same limits that were established in the 1990s. Consequently, these exposure limits, which are based on false suppositions, do not adequately protect workers, children, hypersensitive individuals, and the general population from short-term or long-term RFR exposures. Thus, urgently needed are health protective exposure limits for humans and the environment. These limits must be based on scientific evidence rather than on erroneous assumptions, especially given the increasing worldwide exposures of people and the environment to RFR, including novel forms of radiation from 5G telecommunications for which there are no adequate health effects studies.



Health Canada Scientist Dr. James McNamee is a co-author on this systematic review. New WHO-Funded Study Reports High Certainty of the Evidence Linking Cell Phone Radiation to Cancer in Animals

<https://icbe-emf.org/who-funded-study-reports-high-certainty-of-the-evidence-linking-cell-phone-radiation-to-cancer-in-animals/>

P. Héroux, The Collision between Wireless and Biology, HELIYON

<https://doi.org/10.1016/j.heliyon.2025.e42267>

2025 New Report Contradicts Telecom Industry Claim That Wireless Radiation Is Safe

<https://www.radiationresearch.org/news/new-report-contradicts-telecom-industry-claim-that-wireless-radiation-is-safe/>

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A new peer-reviewed scientific report outlines a mechanism by which non-ionizing radiation can disrupt the biology of living systems, even at levels much lower than what's needed to heat tissues. The telecom industry has consistently claimed that non-ionizing radiation is harmless to human health. By [Suzanne Burdick, Ph.D.](#)

The basis for the wireless industry's claim that radiation is safe for humans is scientifically erroneous, according to the author of a new peer-reviewed [scientific report](#). [Paul Héroux, Ph.D.](#), authored the report, which was published Jan. 30 in [Heliyon](#), one of Elsevier's journals on its ScienceDirect platform. Héroux, an associate professor of medicine at McGill University in Montreal, Canada, and a medical scientist in McGill University Health Center's surgery department, has years of experience in physics and electrical engineering. He is also vice chair of the [International Commission on the Biological Effects of Electromagnetic Fields](#) (ICBE-EMF), a "consortium of scientists, doctors and researchers" who study wireless radiation and make recommendations for [wireless radiation exposure](#) guidelines "based on the best peer-reviewed research publications."

Héroux told The Defender: "Industry's most important argument to deny the [health impacts](#) of [electromagnetic radiation](#) has been that these health effects are impossible based on solid physics, specifically that the radiation is 'non-ionizing.'" Héroux detailed the scientific faultiness of that argument: "Ionization by the radiation itself is irrelevant because life processes produce ionization within the body itself. "In fact, the basic laws of physics (Maxwell's Equations and the Second Law of Thermodynamics) together with established biology confirm that [health effects](#) of electromagnetic radiation are in fact inevitable, and at levels much lower than those considered safe by industry."

Continue Reading: [New Report Contradicts Telecom Industry Claim That Wireless Radiation Is Safe](#)

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2014 CTV Coverage of July 9th C4ST Press Conference

<https://www.youtube.com/watch?v=m7QJPtPMhz4>

Listen to C4ST's Frank Clegg explain why Health Canada gets an 'F' for effort on it's latest review of Safety Code 6 after failing to consider over 130 scientific papers linking radiation from wireless devices to biological changes in human cell.

2014 Federal Wi-Fi safety report is deeply flawed, say experts

<https://www.cmaj.ca/content/186/9/E300>

https://ehtrust.org/wp-content/uploads/c4st-fact-sheet_CanadiansForSafeTechnology.pdf

<https://thecalm.ca/wp-content/uploads/2021/03/2021Flyer2-C4ST.pdf>

[https://www.newswire.ca/news/canadians-for-safe-technology-\(c4st\)/](https://www.newswire.ca/news/canadians-for-safe-technology-(c4st)/)

2021 C4ST's comprehensive and well referenced report, "C4ST Fact-checks Government of Canada Webpages Regarding Health Risks and Wireless Technologies, including 5G

<https://thecalm.ca/wp-content/uploads/2021/03/C4ST-Factchecks-GoC-websites-final.pdf>

2025 Ep. 11: Death by Convenience January 18

<https://talknation.ca/>

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VISTA Proton Drive Folder_HC Safety Code 6 Etc <https://drive.proton.me/urls/OAF7WCGAFC#0a01y0QB7PHI>

Cell phones and WiFi have liberated humanity and provided a lifestyle never experienced in history. But this miraculous convenience has also shackled us to a new era of disease caused by the same technology that makes it so great. Join Rodney Palmer as he interviews Canadians raising the red flag about the dangers of wireless radiation in your life with Dr. Magda Havas, Professor Emeritus, Trent University; Sheena Symington, Director, Electrosensitive Society; and Frank Clegg, CEO, Canadians for Safe Technology (C4ST).

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House of Commons HESA Committee Meeting

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

<https://www.ourcommons.ca/DocumentViewer/en/40-3/HESA/meeting-12/evidence>

https://publications.gc.ca/collections/collection_2015/parl/xc62-1/XC62-1-2-412-58-eng.pdf

Dr. Magda Havas (Pg 8): "I think what is absolutely essential is that we begin to reduce the current guidelines that we have. Safety Code 6 does not protect the public. We need to have areas where this technology is restricted, and that includes schools and hospitals. We need to have some microwave-free zones, and I think we have to educate health care professionals" [...]

Royal Society of Canada Expert Panel: Review of Safety Code 6 (2013):

Health Canada's Safety Limits for Exposure to Radiofrequency Fields

Spring 2014

https://rsc-src.ca/sites/default/files/SC6_Report_Formatted_1.pdf

See page 120, 10.2 Summary of the Panel's Recommendations (also copied below).



An Expert Panel Report prepared at the request of the Royal Society of Canada for Health Canada April 2, 2014

Before Health Canada Safety Code 6 was revised in 2015, Frank Clegg of Canadians for Safe Technology (former CEO of Microsoft Canada) and others pulled together experts in their field and met at the Royal Society of Canada. One such expert was, Dr. Riina Bray and this is a portion of her testimony:

https://publications.gc.ca/collections/collection_2015/parl/xc62-1/XC62-1-2-412-58-eng.pdf

"Good afternoon. My name is Dr. Riina Bray. I have a degree in chemical engineering and a master's in pharmacology in the area of addictions and toxicology. I studied medicine at the University of Toronto and did a specialty in family practice. I have a master's in health sciences, public health, in family and community medicine. [...] **As a physician who has specialized in the area of environmental health for over 20 years, I am mortified at the lack of accountability regarding radio and microwave radiation use in the everyday lives of Canadians both young and old. I am appalled by the poor, impractical, and unrealistic research done in this area and the lack of proper, relevant investigations that need to be done and have not. There are no longitudinal studies except the one going on right now on people who did not ask to be subjects, who gave no research ethics board consent, and on whom data is not being collected. That is not a study at all. [...] How many people out there are feeling unwell from something they can't touch, see, smell, or taste? We must protect our citizens properly, and we have to be educated in order to do that**" - Dr. Riina Bray (Medical Director, Environmental Health Clinic, Women's College Hospital, As an Individual) at the Health Committee On April 28th, 2015

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HESA 2015 Recommendations on Radiofrequency Electromagnetic Radiation and the Health of Canadians

On Tuesday June 9th, 2015 the Standing Committee on Health, whose mandate is to study and report on all matters relating to the mandate, management, and operation of Health Canada, **unanimously adopted the final report into their study of Health Canada's Safety Code 6.** During three full days of hearings spread over two months, the **ten MP member panel heard from both sides of the issue including leading scientists and doctors from around the world, Health Canada and the Canadian Wireless Telecommunications Association.**

On June 17th, 2015, the Chair of the HESA panel MP Ben Lobb read and tabled the below final 12 HESA recommendations into the House of Commons, requesting that the Government table a comprehensive response to the report. As the current Government goes on summer break on June 19th, 2015, followed by the federal election in October, it will be the new Government that is elected that will be responding to this HESA report.

HESA Recommendations

RECOMMENDATION 1

That the Government of Canada, in collaboration with the health departments of the provinces and territories, examine existing cancer data collection methods to improve the collection of information relating to wireless device use and cancer.

RECOMMENDATION 2

That Statistics Canada consider including questions related to electromagnetic hypersensitivity in the Canadian Community Health Survey.

RECOMMENDATION 3

That the Government of Canada, through the Canadian Institutes of Health Research, consider funding research into electromagnetic hypersensitivity testing, diagnosis and treatment, and its possible impacts on health in the workplace.

RECOMMENDATION 4

That the Canadian Medical Association, the Royal College of Physicians and Surgeons, the College of Family Physicians of Canada and the World Health Organization consider updating their guidelines and continuing education materials regarding the diagnosis and treatment of electromagnetic hypersensitivity to ensure they are based on the latest scientific evidence and reflect the symptoms of affected Canadians.

RECOMMENDATION 5

That the Government of Canada continue to provide reasonable accommodations for environmental sensitivities, including electromagnetic hypersensitivity, as required under the *Canadian Human Rights Act*.

RECOMMENDATION 6

That Health Canada ensure the openness and transparency of its processes for the review of Safety Code 6, so that all Canadians have an opportunity to be informed about the evidence considered or excluded in such reviews, that outside experts are provided full information when doing independent reviews, and that the scientific rationale for any change is clearly communicated.

RECOMMENDATION 7

That the Government of Canada establish a system for Canadians to report potential adverse reactions to radiofrequency fields.

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RECOMMENDATION 8

That an independent scientific body recognized by Health Canada examine whether measures taken and guidelines provided in other countries, such as France and Israel, to limit the exposure of vulnerable populations, including infants, and young children in the school environment, to radiofrequencies should be adopted in Canada.

RECOMMENDATION 9

That the Government of Canada develop an awareness campaign relating to the safe use of wireless technologies, such as cell phones and Wi-Fi, in key environments such as the school and home to ensure that Canadian families and children are reducing risks related to radiofrequency exposure.

RECOMMENDATION 10

That Health Canada conduct a comprehensive review of all existing literature relating to radiofrequency fields and carcinogenicity based on international best practices.

RECOMMENDATION 11

That the Government of Canada, through the Canadian Institutes of Health Research, consider funding research into the link between radiofrequency fields and potential health effects such as cancer, genetic damage, infertility, impairment to development and behaviour, harmful effects to eyes and on the brain, cardiovascular, biological and biochemical effects.

RECOMMENDATION 12

That the Government of Canada and manufacturers consider policy measures regarding the marketing of radiation emitting devices to children under the age of 14, in order to ensure they are aware of the health risks and how they can be avoided.

From: [REDACTED]
To: [Wells, Bob](#); [Frisch, David](#); [Jolicoeur, Evan](#); [McCollum, Melanie](#); [Beatson, Dana](#); [PlanningAlias](#); [Schile, Jamai](#); [Garbutt, Geoff](#); [Hillian, Doug](#); [Cole-Hamilton, Will](#); [Morin, Wendy](#); [Proton, Adriana](#); [Matthews, Rayanne](#)
Subject: Fw: Microwave warfare expert publishes book on the hidden dangers EMFs - La Maison du 21e siècle - Le Magazine de la Maison Saine
Date: Monday, September 22, 2025 8:57:02 AM

Good morning,

Here is an excellent book that is a must-read for anyone who really wants to learn about the dangers of EMF and radiofrequencies. Dozens of direct links to pertinent sites. Interestingly, some of us dropped off a petition to stop the 5G roll-out in the Comox Valley. We also gifted the then mayors of Courtenay, Cumberland, Comox and the CVRD with a hard copy of this book. We never heard from anyone.

<https://maisonsaine.ca/english/microwave-warfare-expert-publishes-book-on-the-hidden-dangers-emfs>

I do not consent to the building of the proposed cell tower at 1000 Piercy Rd. Courtenay.

Respectfully,

Marion Hoerberg