

CANADA

PROVINCE OF QUÉBEC
DISTRICT OF MONTRÉAL

(Class Action)
SUPERIOR COURT

S.C.M.: 500-06-000760-153

MARCEL DURAND

Petitioner

v.

ATTORNEY GENERAL OF CANADA & AL.

Respondents

**APPLICATION OF THE ATTORNEY GENERAL OF CANADA FOR AUTHORIZATION
TO SUBMIT RELEVANT EVIDENCE
(ARTS. 574 C.C.P. AND 57 R.S.C.Q.C.M.)**

**TO THE HONOURABLE JUSTICE GARY D.D. MORRISON OF THE SUPERIOR
COURT OF QUEBEC, DESIGNATED AS SPECIAL CASE MANAGEMENT JUDGE IN
THE APPLICATION FOR AUTHORIZATION TO INSTITUTE A CLASS ACTION IN THE
PRESENT FILE, THE RESPONDENT SUBMITS AS FOLLOWS:**

Introduction

1. The Respondent, the Attorney General of Canada (hereafter "AGC"), seeks leave to submit relevant evidence in the present file for the purpose of the hearing of the "Re-re re Amended *Motion for authorization to institute a collective action and to obtain the status of Representative*" ("Motion") dated July 28, 2017, subject to the amendments being granted by the Court and the Motion being in conformity with the decision rendered on June 13, 2017.
2. The Petitioner also served on July 28, 2017 a "Motion for permission to file additional exhibits and Re-Re-Re Amend Motion Seeking Authorization" with a Re-amended list of exhibits R-1A to R-76A, undated, that he intends to invoke in support of his application.
3. The AGC is not opposing the Petitioner's Motion to amend subject to its conformity with the June 13, 2017 judgment but opposes in part the Petitioner's Motion to file additional exhibits, as mentioned in the letter to the Court dated September 12, 2017. The Court has set the hearing date for both Petitioner's Motion to file exhibits and this Motion on November 2, 2017. The AGC's Motion is filed subject to the Court's decision on the Petitioner's Motion to file exhibits.

4. The documentary evidence, in French and English versions, that the AGC wishes to produce consists of the following:
- Broadcasting Procedures and Rules BPR-1, *General Rules*, February 2016, and Règles et procédures sur la radiodiffusion, *Règles générales*, février 2016, as **Exhibit AGC-01**
 - Client Procedures Circular CPC-2-0-03, *Radiocommunication and Broadcasting Antenna Systems*, Issue 5, June 2014, and Circulaire des procédures concernant les clients CPC-2-0-03, *Systèmes d'antennes de radiocommunications et de radiodiffusion*, 5^e édition, juin 2014, as **Exhibit AGC-02**
 - Client Procedures Circular CPC-2-0-20, *Radio Frequency (RF) Fields - Sign and Access Control*, Issue 1, March 2013, and Circulaire des procédures concernant les clients CPC-2-0-20, *Champs de radiofréquences - Panneaux et contrôle de l'accès*, 1^{re} édition, mars 2013, as **Exhibit AGC-03**
 - Technical note TN-261, Safety Code 6 (SC6) Radio Frequency Exposure Compliance Evaluation Template (Uncontrolled Environment Exposure Limits), Issue 3, March 19, 2015, and NT-261 - Modèle d'évaluation de l'exposition aux champs de radiofréquences selon le Code de sécurité 6 (CS6) (environnements non contrôlés, 3^e édition, mars 2015, as **Exhibit AGC-04**
 - Guideline GL-01, *Guidelines for the Measurement of Radio Frequency Fields at Frequencies from 3 KHz to 300 GHz*, Issue 3, March 2015, and Lignes directrices LD-01, *Lignes directrices relatives à la mesure des champs radioélectroniques dans la gamme de fréquences de 3 kHz à 300 GHz*, 3^e édition, mars 2015, as **Exhibit AGC-05**
 - Guideline GL-08 — *Guidelines for the Preparation of Radio Frequency (RF) Exposure Compliance Reports for Radiocommunication and Broadcasting Antenna Systems*, Issue 1, November 2010, and Lignes directrices LD-08, *Lignes directrices pour la préparation de rapports de conformité sur l'exposition aux radiofréquences (RF) pour les systèmes d'antenne de radiocommunication et de radiodiffusion*, 1^{re} édition, novembre 2010, as **Exhibit AGC-06**
 - Radio Standards Specification RSS-Gen, General requirements for compliance of radio apparatus, Issue 4, November 2014, and CNR-Gen - Exigences générales relatives à la conformité des appareils de radiocommunication, 4^e édition, novembre 2014, as **Exhibit AGC-07**

- Radio Standards Specification RSS-102, Radio Frequency (RF) Exposure Compliance of Radiocommunication Apparatus (All Frequency Bands), Issue 5, March 2015, and Cahier des charges sur les normes radioélectroniques CNR-102, Conformité des appareils de radiocommunication aux limites d'exposition humaine aux radiofréquences (toutes bandes de fréquences), 5e édition, mars 2015, as **Exhibit AGC-08**
- Limites d'exposition humaine à l'énergie électromagnétique radioélectrique dans la gamme de fréquences de 3 kHz à 300 GHz, code de sécurité 6 (2015) (French version only), as **Exhibit AGC-09**
- 2015 Revisions to Safety Code 6: Summary of Consultation Feedback - June 5, 2015, and Révision du Code de sécurité 6 (2015): Résumé des commentaires recueillis dans le cadre de la consultation - 5 juin 2015, as **Exhibit AGC-10**
- Fact Sheet - What is Safety Code 6? - September 25, 2015, and Feuillet de renseignements - Qu'est-ce que le Code de sécurité 6? - 25 septembre 2015, as **Exhibit AGC-11**
- Frequently Asked Questions (FAQ) on Radiofrequency Energy and Health, modified March 15, 2015, and Questions souvent posées en ce qui concerne l'énergie radioélectrique et la santé, modifié le 15 mars 2015, as **Exhibit AGC-12**
- ISED Canada's Publication - Facts about Towers, For Citizens, Towers in your Community, March 19, 2015, and ISDE Canada, publication de Les faits au sujet des pylônes, pour les citoyens, Des pylônes dans votre collectivité, 19 mars 2015, as **Exhibit AGC-13**
- Government of Canada's response to the Report of the Standing Committee on Health entitled "Radiofrequency Electromagnetic Radiation and the Health of Canadians", dated June 15, 2016, and Réponse du gouvernement Canadien au rapport du comité permanent de la santé intitulé « Le rayonnement électromagnétique de radiofréquences et la santé des Canadiens », datée du 15 juin 2016, as **Exhibit AGC-14**
- Extract (pp. 36 à 50) of « Rapport d'expertise collective - Exposition aux radiofréquences et santé des enfants », ANSES, juin 2016 (French version only), as **Exhibit AGC-15**
- Welcome webpage of «Collective action Quebec» website on July 18, 2016 (English version only), as **Exhibit AGC-16**

- Full Spectrum measures website on October 6, 2017 (English version only), as **Exhibit AGC-17**
 - Full Spectrum Measures corporate information from Corporation Canada's website, and Information concernant la société Mesures Plein Spectre du site Corporations Canada, as **Exhibit AGC-18**
5. All of these documents are public and accessible on the internet. They will provide relevant insights into the subject matter of the proposed class action without being too voluminous and they will enable the Court to undertake an informed analysis of the authorization criteria set out in article 575 of the *Code of Civil Procedure* (hereinafter "C.C.P.").
 6. The evidence which the AGC proposes to submit is proportionate in terms of the nature, magnitude and the scale of the proposed class action.

The proposed class action

7. As alleged in the Motion, the Petitioner wishes to institute a class action on behalf of the class described as follows (p. 6 of the Motion):

All persons who reside, work, [...] study in any part of the Province of Quebec [...], as well as flora, fauna, pets and animals that are exposed to a level in excess of one milliGauss of magnetic field, 0.6 V/m of electric field, or 0.1 microWatt per square centimeter of microwave power density for general populations in uncontrolled environments; or 0.3 milliGauss of magnetic field, 0.2 V/m of electric field, or 0.01 microWatt per square centimeter of microwave power density for sleeping environments or for sensitive individuals (children, pregnant women or persons who are electromagnetic hypersensitive) from any one or any combination of anthropogenic the listed electromagnetic field (EMF) sources, who suffered moral, physical, psychological and/or genetic damages as a result EMF pollution. Pursuant to the precautionary principle, those born, not of the age of majority, are nonetheless claiming as class members given the pervasive, escalating and cumulative effects of EMF pollution (as appears from the following Threshold Exposure Standard):

<u>Declared Threshold Exposure Standard for General Population in Uncontrolled Environments</u>				
<u>Radiation Type</u>	<u>Band</u>	<u>Threshold Value</u>	<u>Units</u>	
<u>Power Density</u>	<u>Radio Frequency</u> <u>3 kHz – 300 GHz</u>	<u>0.1</u>	<u>μW/cm²</u>	<u>microWatts per square centimeter</u>
<u>Magnetic Field</u>	<u>Low Frequency</u> <u>3 Hz – 30 kHz</u>	<u>1</u>	<u>mG</u>	<u>milliGauss</u>
<u>Electric Field</u>	<u>Low Frequency</u> <u>3 Hz – 30 kHz</u>	<u>0.6</u>	<u>V/m</u>	<u>Volts per meter</u>

References: Council of Europe Resolution 1815: 2007 Bioinitiative Report

<u>Declared Threshold Exposure Standard for Sensitive Individuals* or Sleeping Environments</u>				
<u>Radiation Type</u>	<u>Band</u>	<u>Threshold Value</u>	<u>Units</u>	
<u>Power Density</u>	<u>Radio Frequency</u> <u>3 kHz – 300 GHz</u>	<u>0.01</u>	<u>μW/cm²</u>	<u>microWatts per square centimeter</u>
<u>Magnetic Field</u>	<u>Low Frequency</u> <u>3 Hz – 30 kHz</u>	<u>0.3</u>	<u>mG</u>	<u>milliGauss</u>
<u>Electric Field</u>	<u>Low Frequency</u> <u>3 Hz – 30 kHz</u>	<u>0.2</u>	<u>V/m</u>	<u>Volts per meter</u>

References: Council of Europe Resolution 1815: 2007 Bioinitiative Report

* Sensitive Individuals include EHS, young children and pregnant women

The term “cumulative effects” is meant in the largest sense of the word, including exposures over time as well as exposures from multiple and varied EMF sources. It refers to the entire gamut of damages caused by EMF and its raison d’être.

Electromagnetic hash [...] (persistent, ubiquitous and significant EMF) represents a significant concern throughout Québec, including remotely-populated zones [...]. Anthropogenic EMF is measurable throughout Quebec attributable to technologies and infrastructures ranging from the low frequency power distribution grid through to high frequency mobile telecommunications networks. Not isolated systems, EMF from one system may couple onto an adjacent network compounding health effects, particularly for electro-sensitive individuals. Systems producing EMF include power distribution lines (residential 240V through to 735 kV transmission lines), wirelessly networked computer systems in industry, institutions and business including public spaces like shopping centres; ubiquitous smart meters [...] with highly pulsed microwave transmissions; widespread communication networks (WiFi, NAN, WAN) including dedicated emergency and security service digital communications networks; transportation support

[...] communications (civil and military radar, maritime installations, air traffic infrastructure, etc.); and kilohertz-ballast-excited lighting fixtures.

8. The nature of the recourse which the Petitioner wishes to exercise on behalf of the members of the class consists of (p. 41 of the Motion):

An action in damages and injunctive relief against the Respondents Attorney General of Québec, and the other Respondents seeking damages for the cumulative effect of EMF pollution to Quebecers

9. The Petitioner proposes more than 40 questions of law or fact that are alleged to be identical, similar or related between each member of the class and the Respondents, and that no questions of fact or law are particular to each of the members, except for the specific amount of damages (para 5 and 6, page 30-37 of the Motion). The proposed questions go in all directions, such as whether the EMF emissions exceed the “European standard” as described by Petitioner (para 5 E), failure to warn (para 5 J), hiding of information (para 5 J.1 (i)), failure to act in a timely manner (para 5P), wilful and intentional “covering up technical information, carcinogenic nature and other health risks due to cumulative EMF exposure” (para 5 J.1 (ii)), failure to protect against and carefully study EMF pollution (para 5 Q), and at para 5 X:

Whether by failing to adequately regulate and apply laws, regulations, codes or bylaws, the governmental entities named herein were at fault, acted in bad faith and willingly participated in or sanctioned [...] EMF pollution and the breach of class members’ fundamental rights;

10. More precisely, the Petitioner alleges at paragraph 5 U (page 23 of the Motion) that, for the AGC, the “principle EMF emissions and enabling behaviour and technology of the Defendants” is for:

Attorney General of Canada: failure of Canadian government; especially Health Canada, to fulfill mandate of “. . . ensuring best health of Canadians”; capitulation with industry to suppress health risks, conflicts of interest; willful negligence in reviewing/considering relevant recent research for updating EMF safety guidelines; failure to protect basic Charter rights;

11. One of the conclusions sought by the Petitioner is a condemnation in the amount of 113 000\$ per person against the AGC and the other 48 named Respondents, on a joint and several basis (p. 60 of the Motion). The Petitioner alleges at para 4 A, (p.19 of the Motion), that the number of physical persons affected is at least 3% of the population of Quebec and reserves its right to vary the percentage of the “Quebecers they represent” up to 15 % of the Quebec population.
12. The Petitioner seeks several conclusions against all Respondents in the nature of injunctive relief, notably the implementation of the recommendations of the Canadian House of Commons Standing Committee report (referred to as Exhibit R-26 at page 40 of the Motion but listed as Exhibit 66 in the list of exhibits), the adoption of the specific EMF standards set out in his Motion, and the application of the

precautionary principle to the “legislation, regulation, monitoring, abatement and remediation of cumulative EMF pollution in Quebec”.

13. Among the exhibits listed in the Petitioner's Amended list of exhibits, some are publications of the Government of Canada which are publicly available on the internet, namely, R-26 B concerning safety of cell phones and cell phone towers, R-58 concerning health issues from radiation exposure, R-65 as Safety Code 6 (2015), R-68 concerning the mission, values and activities of Health Canada, and R-75A concerning electric and magnetic fields from power lines and electrical appliances.
14. The hearing of the Motion is scheduled for 4 days in May 2018 and the AGC will oppose the Application for authorization to institute a class action and obtain the status of representative on the basis that it does not meet any of the conditions set out in article 575 C.C.P.

Relevant documentary evidence

15. The Minister of the Department of Innovation, Science, and Economic Development (“ISED”) has the powers and duties set out in the *Department of Industry Act* and the *Radiocommunication Act*.
16. Under the *Radiocommunication Act*, the Minister can regulate any transmission, emission or reception of signs, signals, writing, images, sounds or intelligence of any nature by means of electromagnetic waves through space in the range from 0 – 3000 GHz. Notably, the Minister is responsible for the issuance of licences and the establishment of technical requirements and standards.
17. Exhibits 1 to 8 are procedural documents such as procedures circulars, technical notes, guidelines and Radio Standard Specification issued by the Minister of ISED that are relevant to the subject matter of the proposed class action for the authorization hearing. These exhibits outline the regulatory framework that applies to radiocommunication and broadcasting installations and apparatus in Canada, notably their compliance with the limits for human exposure to radiofrequency fields in the frequency range from 3 kHz to 300 GHz in Safety Code 6 (2015).
18. The Minister of Health (“Minister”) has the powers, duties and functions set out in the *Department of Health Act*. Exhibit 9 is Safety Code 6, published in 2015 by the Consumer and Clinical Radiation Protection Bureau, Environmental and Radiation Health Science Directorate, Healthy Environments and Consumers Safety Branch of Health Canada.
19. Exhibits 10 and 11 are publications posted on Health Canada’s website in 2015 to inform the general public about Safety Code 6. Exhibit 10 provides information on Health Canada’s mandate, the process for updating Safety Code 6 and Health Canada’s responses to consultation feedback. Exhibit 11 provides information which allows for a better understanding of Safety Code 6 (2015).

20. Exhibit 12 is a FAQ (frequently asked questions) that has been jointly developed by Health Canada and Industry Canada in order to address various questions related to radiofrequency exposure of the general public. Exhibit 13 is a publication for citizens printed from the ISED website which contains facts about towers.
21. The exhibits 10 to 13 provide factual and contextual background, as well as information explained in simplified layman's terms, necessary for the analysis of the conditions contained in arts. 575 (1) and (2) C.C.P.
22. Exhibit 14 is the Government of Canada's response to the Thirteenth Report of the Standing Committee on Health, entitled "Radiofrequency Electromagnetic Radiation and the Health of Canadians" tabled in the House of Commons on June 15, 2016. The Petitioner seeks that the committee's recommendations be implemented. It is consequently relevant for this Court to have at this stage, the government response posted on the House of Commons website. The response provides relevant information as well as the ministerial position on the recommendations, which speaks to concerns that are also raised in the Motion and the exhibits.
23. Exhibit 15 completes Exhibits R-20 O, P, Q alleged at para 2 H (xvi) (page 12) of the Motion as the Petitioner has only filed the summary of the Anses Opinion on Exposure to Radiofrequency published in June 2016. The AGC does not request the filing of the 274-page report but only pages 36 to 50 which describe "*Le cadre réglementaire européen relatif à l'exposition du public aux champs électromagnétiques*". This portion of a document which the Petitioner himself refers to in support of his motion is relevant, as it shows that contrary to Petitioner's allegation, Council of Europe Resolution 1815 is not part of the regulatory framework in Europe.
24. The AGC submits that the Exhibits AGC-16 17 and 18, which are extracts from the Petitioner's website on July 18, 2016, the current information available on the website of "Full Spectrum Measure" and the federal corporation information relating to Full Spectrum Measures from Corporation Canada's website are relevant for the determination of the conditions set out at arts. 575 (1) and (4) C.C.P.

Conclusion

25. It would be contrary to the interests of justice and the guiding principle of proportionality for the Court to analyze the application for authorization without benefiting from the limited but nevertheless highly relevant factual and contextual background, and information explained in simplified layman's terms, contained in the proposed documentary evidence.
26. The documentary evidence that the AGC wishes to submit is publicly available, relevant, useful and appropriate in that this evidence will contribute positively to the

Court's analysis of the criteria for authorization and will avoid that this disproportionate proposed class action against the AGC be decided in a vacuum.

27. The AGC further specifies that nothing in the present motion constitutes an admission that the Petitioner's Motion for authorization or Motion to file exhibits should be granted, nor should it be so construed.

FOR ALL THESE REASONS, MAY IT PLEASE THIS COURT TO:

GRANT the present Application;

ALLOW the Respondent to submit the following evidence to be presented at the hearing of the *Motion for authorization to institute a collective action and obtain the status of Representative*:

- AGC-01** Broadcasting Procedures and Rules BPR-1, *General Rules*, February 2016, and Règles et procédures sur la radiodiffusion, *Règles générales*, février 2016
- AGC-02** Client Procedures Circular CPC-2-0-03, *Radiocommunication and Broadcasting Antenna Systems*, Issue 5, June 2014, and Circulaire des procédures concernant les clients CPC-2-0-03, *Systèmes d'antennes de radiocommunications et de radiodiffusion*, 5^e édition, juin 2014
- AGC-03** Client Procedures Circular CPC-2-0-20, Radio Frequency (RF) Fields - Sign and Access Control, Issue 1, March 2013, and Circulaire des procédures concernant les clients CPC-2-0-20, Champs de radiofréquences - Panneaux et contrôle de l'accès, 1^{re} édition, mars 2013
- AGC-04** Technical note TN-261, Safety Code 6 (SC6) Radio Frequency Exposure Compliance Evaluation Template (Uncontrolled Environment Exposure Limits), Issue 3, March 19, 2015, and NT-261 - Modèle d'évaluation de l'exposition aux champs de radiofréquences selon le Code de sécurité 6 (CS6) (environnements non contrôlés, 3^e édition, mars 2015
- AGC-05** Guideline GL-01, Guidelines for the Measurement of Radio Frequency Fields at Frequencies from 3 KHz to 300 GHz, Issue 3, March 2015, and Lignes directrices LD-01, Lignes directrices relatives à la mesure des champs radioélectroniques dans la gamme de fréquences de 3 kHz à 300 GHz, 3^e édition, mars 2015
- AGC-06** Guideline GL-08 — Guidelines for the Preparation of Radio Frequency (RF) Exposure Compliance Reports for Radiocommunication and Broadcasting Antenna Systems, Issue 1, November 2010, and Lignes directrices LD-08, Lignes directrices pour la préparation de rapports de

conformité sur l'exposition aux radiofréquences (RF) pour les systèmes d'antenne de radiocommunication et de radiodiffusion, 1re édition, novembre 2010

- AGC-07** Radio Standards Specification RSS-Gen, General requirements for compliance of radio apparatus, Issue 4, November 2014, and CNR-Gen - Exigences générales relatives à la conformité des appareils de radiocommunication, 4e édition, novembre 2014
- AGC-08** Radio Standards Specification RSS-102, Radio Frequency (RF) Exposure Compliance of Radiocommunication Apparatus (All Frequency Bands), Issue 5, March 2015, and Cahier des charges sur les normes radioélectroniques CNR-102, Conformité des appareils de radiocommunication aux limites d'exposition humaine aux radiofréquences (toutes bandes de fréquences), 5e édition, mars 2015
- AGC-09** Limites d'exposition humaine à l'énergie électromagnétique radioélectrique dans la gamme de fréquences de 3 kHz à 300 GHz, code de sécurité 6 (2015) (French version only)
- AGC-10** 2015 Revisions to Safety Code 6: Summary of Consultation Feedback - June 5, 2015, and Révision du Code de sécurité 6 (2015): Résumé des commentaires recueillis dans le cadre de la consultation - 5 juin 2015
- AGC-11** Fact Sheet - What is Safety Code 6? - September 25, 2015, and Feuillet de renseignements - Qu'est-ce que le Code de sécurité 6? - 25 septembre 2015
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- AGC-14** Government of Canada's response to the Report of the Standing Committee on Health entitled "Radiofrequency Electromagnetic Radiation and the Health of Canadians", dated June 15, 2016, and Réponse du gouvernement Canadien au rapport du comité permanent de la santé intitulé « Le rayonnement électromagnétique de radiofréquences et la santé des Canadiens », datée du 15 juin 2016
- AGC-15** Extract (pp. 36 à 50) of « Rapport d'expertise collective - Exposition aux radiofréquences et santé des enfants », ANSES, juin 2016 (French version only)

- AGC-16** Welcome webpage of «Collective action Quebec» on July 18, 2016 (English version only)
- AGC-17** Full Spectrum measures website on October 6, 2017 (English version only)
- AGC-18** Full Spectrum Measures corporate information from Corporation Canada's website, and Information concernant la société Mesures Plein Spectre du site Corporations Canada

THE WHOLE with costs to follow.

MONTREAL, this 13th day of October, 2017

Attorney General of Canada

ATTORNEY GENERAL OF CANADA

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CANADA

PROVINCE OF QUÉBEC
DISTRICT OF MONTRÉAL

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**LIST OF EXHIBITS IN SUPPORT OF THE APPLICATION OF THE ATTORNEY
GENERAL OF CANADA FOR AUTHORIZATION TO SUBMIT RELEVANT EVIDENCE**

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- AGC-02** Client Procedures Circular CPC-2-0-03, *Radiocommunication and Broadcasting Antenna Systems*, Issue 5, June 2014, and Circulaire des procédures concernant les clients CPC-2-0-03, *Systèmes d'antennes de radiocommunications et de radiodiffusion*, 5^e édition, juin 2014
- AGC-03** Client Procedures Circular CPC-2-0-20, Radio Frequency (RF) Fields - Sign and Access Control, Issue 1, March 2013, and Circulaire des procédures concernant les clients CPC-2-0-20, Champs de radiofréquences - Panneaux et contrôle de l'accès, 1^{re} édition, mars 2013
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- AGC-06** Guideline GL-08 — Guidelines for the Preparation of Radio Frequency (RF) Exposure Compliance Reports for Radiocommunication and Broadcasting Antenna Systems, Issue 1, November 2010, and Lignes directrices LD-08, Lignes directrices pour la préparation de rapports de conformité sur l'exposition aux radiofréquences (RF) pour les systèmes d'antenne de radiocommunication et de radiodiffusion, 1re édition, novembre 2010
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- AGC-15** Extract (pp. 36 à 50) of « Rapport d'expertise collective - Exposition aux radiofréquences et santé des enfants », ANSES, juin 2016 (French version only)
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MONTREAL, this 13th day of October, 2017

Attorney General of Canada

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NOTICE OF PRESENTATION

TO: M^e Charles O'Brien
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Montreal (QC) H3K 2N2

TAKE NOTICE that the present *Application of the Attorney General of Canada for authorization to submit relevant evidence* will be presented for adjudication before the Honorable Justice Gary D.D. Morrison of the Superior Court, designated as special case management judge sitting in and for the district of Montreal on November 2, 2017, at 9:15AM in a room to be determined later of the Montreal Courthouse, located at 1 Notre-Dame Street East.

DO GOVERN YOURSELVES ACCORDINGLY.

MONTREAL, this 13th day of October, 2017

Attorney General of Canada

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Counsels for the AGC



No. 500-06-000760-153
SUPERIOR COURT (Class Action)
DISTRICT OF MONTREAL

MARCEL DURAND

Petitioner

v.

ATTORNEY GENERAL OF CANADA & AL.
Respondents

**APPLICATION OF THE ATTORNEY
GENERAL OF CANADA FOR
AUTHORIZATION TO SUBMIT RELEVANT
EVIDENCE (ARTS. 574 C.C.P. AND 57 R.S.C.Q.C.M.)
LIST OF EXHIBITS AGC-01 TILL AGC-18**

ORIGINAL

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