Comments on Opt-Out Program for the Advanced Metering System

- Barry Malowanchuk, Retired Professional Engineer (ex Manitoba Hydro) with 60+ years of Wireless experience

- Extensive Experience with Radio Frequency Electromagnetic Fields Safety Issues
  - Guided Manitoba Hydro RF EMF Safety Program
  - Practice Personal Safety with Amateur Radio equipment 50 MHz to 241 GHz

Comments on Opt-Out Program for the Advanced Metering System

- From the Diameter Report, that City contracted for, the Health Canada website states “There are no health risks from exposure to radiofrequency EMF from smart meters”.

Health Canada has not done Long Term & Low Intensity exposure studies to determine the safety of radio frequency EMF.

Previously “Smoking/ Vaping / Asbestos/ UFFI were considered as Safe”

Comments on Opt-Out Program for the Advanced Metering System

- My Experience has shown that a small part of the population do have Hyper Sensitivity to Radio Frequency EMF radiation.

- The City of Winnipeg must accommodate people with this condition by providing a fulsome Opt-Out program!

- The COW should add the options in the Request for Proposal it would like to offer to householders who want to opt-out.

Comments on Opt-Out Program for the Advanced Metering System

- From the Diameter Report which was contracted for by the City "Unlicensed frequency devices have a power limitation of 1W per transmission while licensed frequency radio transmitters can provide up to 2W of power. In addition, depending on the technology, **AMI radio transmissions can be less frequent and on a scheduled basis"**

This is not low power transmissions!

Safety cannot be assured.

As a Minimum, can locations with "sensitive" occupants be configured for lowest number of transmissions with a minimum of transmitter power?

Comments on Opt-Out Program for the Advanced Metering System

- **From the Diameter Report "3.8.2. Radio Transmitter Location**

  To limit the amount of infrastructure required in a fixed network environment while maintaining daily read success rates, **Diameter recommends fixed network radio transmitters be located on the outside of the premises**."

- **"The Financial Model will assume that the radio transmitters will be located on the outside of premises."**

Is This Still the Case?

Final Comments on Opt-Out Program Recommendations for the Advanced Metering System

- **I support the recommendation from the Water, Waste & Environment Standing Committee on June 27, 2025 with the following modifications:**
  - **There should be No Cost to the Customer**
  - **The Option Should be Available When Moving to a New Residence**
  - **A Medical Letter signed by any Medical Doctor Registered in Canada**
- **The City should add the Options in the Request for Proposal it would like to offer to householders who want to Opt-Out.**

Final Comments on Opt-Out Program Recommendations for the Advanced Metering System

- Councilors I urge you to vote **in opposition** to the recommendations as they appear in the Council Agenda for July 17th 2025.

- Also direct the Public Service to come back with details as to how they will work with individual customers in using different options to address health and other concerns.

  This was stated by a member of the Public Service at the Water, Waste and Environment Committee meeting on June 27, 2025.

Comments on Winnipeg's Smart Water Meter Replacement Plan

By Barry Malowanchuk P.Eng. (ret) July 15 , 2025

My Background

I was a telecommunications engineer for over 40 years with Manitoba Hydro, and I have over 60 years of Wireless experience.

I have been an active Amateur Radio operator for 60 years and utilize all licensed frequencies from 50 to 241,000 MHz.

My Recommendation

I ask the Council to Oppose Acceptance of Executive Policy Committee Recommendations 1 and 2.

> **1.“*That the City not implement an Opt-Out Program for the Advanced Metering System in order to maximize the full benefits of the AMI technology.”***
>
> ***2. That a public education campaign be implemented to help address customer concerns by explaining safety standards and the benefits of AMI technology.***

Justification

1. Councilors need to see a detailed proposal for the opt-out program so that they can make an informed decision. The proposed opt-out program should be presented as information (before any vote occurs) so that there is time for Councilors and the public to study and provide comments.

   This should be done before a Request for Proposal (RFP) is put out so that certain features can be specified.

   The Executive Policy Committee voted to reject the recommendation passed unanimously by the Water, Waste and Environment Committee on June 27 regarding accommodating those with disabilities.

   There is nothing on record to indicate that the City will accommodate those with disabilities in any way.

   Maximizing the benefits to the City overrides any legitimate medical concerns for the relatively small number of people with disabilities?

2. How is a public education campaign going to remedy medical issues for those that have disabilities related to wireless technologies?

Discussion

The Diameter report discussed development of an Opt-out Program and proposed that it be finalized after responses to the RFP were received.

The City staff at the Water, Waste and Environment committee meeting on October 30, 2023 stated that they fully expected to have an opt-out program and that some form of cost recovery might be needed.

The Water, Waste and Environment Committee on June 27, 2025 recommended regarding accommodating those with disabilities:

"The Standing Policy Committee on Water, Waste and Environment did not concur in the recommendation of the Winnipeg Public Service, and recommended to Council: 1. That, prior to the installation of the new meters, the Winnipeg Public Service be directed to present alternative options as described in the report, as well as an option to not have a transmitter installed on the property, to ratepayers who can provide proof of need of a medical exemption, such as a medical letter signed by a physician registered with The College and Physicians and Surgeons of Manitoba or proof of the ability to claim the Canada Revenue Agency Disability Tax Credit."

I know it's easy to hide behind the flawed Safety Code 6 and pretend that no one has legitimate medical issues with EMF radiation but that is not reality.

Is the COW now ready for a Public Outcry if people with disabilities are forced out of their homes and life in the City?

In Closing

Councilors I urge you to vote **in opposition** to the recommendations as they appear in the Council Agenda for July 17th 2025.

Also direct the Public Service to come back with details as to how they will work with individual customers in using different options to address health and other concerns. This was stated by a member of the Public Service at the Water, Waste and Environment Committee meeting on June 27, 2025.

EXECUTIVE POLICY COMMITTEE RECOMMENDATION:

1."***That the City not implement an Opt-Out Program for the Advanced Metering System in order to maximize the full benefits of the AMI technology."***
2. That a public education campaign be implemented to help address customer concerns by explaining safety standards and the benefits of AMI technology.