



March 11, 2017

BC Environmental Assessment Office  
PO Box 9426 Stn Prov Govt  
Victoria, BC V8W 9V1

**Attention:** Michael Shepard,

**RE: Boycott of latest public comment period for proposed Woodfibre LNG project**

Dear Mr Shepard,

This last week it has been shocking to learn that the BC Liberals are under investigation by Elections BC and the RCMP after The Globe and Mail revealed the party is accepting illegal donations from lobbyists, highlighting donations by Byng Giraud and Marian Ngo from Woodfibre LNG. I copy excerpts from these articles below:

**British Columbia: The ‘wild west’ of fundraising by Kathy Tomlinson, 2017-03-04**

<http://www.theglobeandmail.com/news/investigations/wild-west-bc-lobbyists-breaking-one-of-provinces-few-political-donationrules/article34207677/>

*“A Globe and Mail review of public records found dozens of people who get paid to promote special interests also give tens of thousands of dollars every year – under their own names, not those of the interests they represent – to help B.C.’s governing politicians pay for their campaigns.*

*Many are registered lobbyists, whose job is trying to influence those politicians to make decisions that will benefit their clients.*

*Those unfettered donations would not be allowed almost anywhere else in Canada, because most other provinces and the federal government now have annual caps on how much individual donors can give. B.C. has almost no rules governing political donations, making it a holdout and an outlier and leading many critics to brand it as the “wild west.”*

...

*The Globe investigation in B.C. also found some lobbyists violating one of the few rules the province has: that donors cannot be reimbursed by clients or companies for their political contributions. Doing so means they are giving on behalf of other entities and leaving the public in the dark about the source of the money because the contribution is listed in public records as coming from the lobbyist not the company or person that covered the cost.*

...



*They are independent consultants or salaried employees – not wealthy philanthropists. They fly under the radar because they give multiple times rather than in one lump sum and often donate in their own names, not those of the special interests they represent.*

*Usually, they pay thousands of dollars for tickets or tables at fundraisers, where they or their clients can chat up politicians, after being tapped repeatedly by the political parties to buy in.*

*Because individuals and corporations – foreign or local – can give as many times as they want to in B.C., some Liberal supporters told *The Globe* it is a free-for-all – and some players who need to compete with others for politicians’ attention feel “coerced” by the party to keep giving or be shut out of the increasingly expensive inner circles.*

*One lobbyist said there is “no limit” to the calls and e-mails from the Liberals – and also from the New Democrats – asking for money, and it feels “extortionist.” A consultant called it “like a shakedown,” particularly near election time. Still, another said B.C.’s system “corrupts in a very deep and profound way.”*

*The rules in B.C. making it illegal to donate on behalf of others make it very clear the money must come from the contributor’s own pocket.*

*“The Elections Act is very specific that it must be your money. You can’t make a political contribution and then be reimbursed by an organization or individual,” said Elections B.C. deputy chief electoral officer Nola Western.*

*“It is trying to guard against potential corruption or the appearance of corruption.”*

*Several party donors and insiders told *The Globe* that law is routinely skirted by scores of individuals who represent special interests, and made donations for which they are reimbursed.*

...

*Donors also do not have to disclose who they work for, even though experts on campaign-finance reform say that would shine a light on where the money comes from.*

*Another frequent donor is Byng Giraud, the top in-house lobbyist for Woodfibre LNG, an Indonesian firm that is building a liquefied natural gas plant near Squamish that some locals oppose.*

*Bios of Mr. Giraud online say he “has extensive political experience.” He has also given the B.C. Liberals \$47,149 in 20 payments, under his own name, in the past three years.*

*A less senior Woodfibre manager, Marian Ngo, gave the party \$28,000, in 14 donations, most of that just last year. She had never donated to any B.C. political campaign before becoming a lobbyist for the LNG firm.*

*The pair’s combined contributions exceeded the \$69,500 that Woodfibre has donated under its companies’ names.*



*“I expense it. I put it on my own credit card and then I expense it and get reimbursed [by Woodfibre],” Mr. Giraud said. He made it clear all of those donations were for fundraisers – and he and Ms. Ngo paid on behalf of their employer, not out of their own pockets.*

*“This is common practice,” Mr. Giraud said, adding that the ticket-purchase forms on the party’s website often have no field to put the company name. “If I have done something wrong, I will fix it. I am not trying to hide here.”*

*During the period he and Ms. Ngo were giving the governing party money, their employer’s LNG plant proposal was undergoing environmental assessments, which passed. It also negotiated a controversial subsidy on electricity rates from the province and other tax breaks.*

*Mr. Giraud said attending lots of fundraisers is “a good way for your organization to get remembered. ... It’s important to be seen and it’s just part of the culture. It’s the cocktail circuit for people who are in politics.”*

...

#### **Elections B.C. probes Liberal Party fundraising by Kathy Tomlinson 2017-03-05**

<http://www.theglobeandmail.com/news/british-columbia/elections-bc-probes-liberal-party-fundraising/article34210991/>

*“The governing Liberal Party in British Columbia is under investigation for its fundraising practices by Elections B.C., after The Globe and Mail revealed lobbyists are illegally funnelling money to the party – routinely – on behalf of corporate and special interests.*

*“I can tell you these are potentially contraventions of the Elections Act,” said deputy chief electoral officer Nola Western. “It appears to be a systemic problem that needs to be addressed.”*

*The independent body that enforces the province’s election laws said its probe will look at tens of thousands of dollars in multiple donations, made by power brokers such as Mark Jiles and Byng Giraud, who paid under their own names, with personal credit cards.*

*Both registered lobbyists acknowledged to The Globe they were actually buying Liberal fundraising tickets on behalf of their clients and companies, then getting reimbursed, which is against the law.*

*“That’s an indirect political contribution and that’s not okay,” said Ms. Western. “You can only make a political contribution with your own money – and you can’t be reimbursed.”*

*Mr. Jiles is an independent consultant, paid by numerous clients to lobby politicians to make decisions favourable to those clients. Mr. Giraud is the top in-house lobbyist for Woodfibre LNG, an Indonesian firm building a controversial liquefied natural gas plant near Squamish, B.C., which has recently been given government approvals and tax breaks.”*

...



**RCMP to investigate political donations in B.C. by Kathy Tomlinson 2017-03-10**

<http://www.theglobeandmail.com/news/british-columbia/investigation-of-political-donations-in-bc-referred-to-rcmp/article34266086/?cmpid=PM0317>

*“British Columbia’s elections agency has referred its investigation into political fundraising to the RCMP, just weeks before the start of a spring election campaign.*

*Elections BC announced the probe after The Globe and Mail reported that the BC Liberal Party collected tens of thousands of dollars in multiple donations from lobbyists who paid under their own names with personal credit cards on behalf of clients and companies, and were reimbursed. An Elections BC spokesperson said such donations are “potentially contraventions of the Elections Act.”*

*The agency announced Friday it had handed off the file to the RCMP to ensure the investigation did not interfere with the administration of the May election, in which the Liberals are seeking a fifth consecutive term in government and the NDP a return to power for the first time since 2001.*

*RCMP spokeswoman Sergeant Annie Linteau confirmed that the Mounties had taken up the case after receiving a request from Elections BC to investigate “allegations of indirect contributions and other potential contraventions of the Elections Act.”*

...

*Elections BC has said the investigation involves not only donors, but also the financial agents of political parties that have received donations.”*

Following these revelations, we initiated our own research to determine the extent of the donations that Woodfibre LNG and their staff and lobbyists have donated to the BC Liberal party.

To date, Woodfibre LNG and their staff have donated at least \$166,934 to the BC Liberal Party since 2013, while the project was undergoing its environmental assessment. This calls into question the integrity of BC’s environmental assessment process, and raises real concerns that Woodfibre LNG has bought a rubber stamp approval for the project.

This amount doesn’t include donations from other registered Woodfibre LNG lobbyists to purchase tickets to “cash for access” events organized by the BC Liberal Party, which our initial calculations indicate may be up to or more than \$46,350.

I have attached spreadsheets with our initial calculations of the donations from Woodfibre LNG, Byng Giraud, and Marion Ngo, as well as donations from lobbyists that coincide with the dates that they are registered as lobbyists for Woodfibre LNG.

We have advised our supporters to boycott this latest public comment period for the amendment to Woodfibre LNG’s environmental assessment certificate until a full enquiry is launched into Woodfibre



LNG's environmental assessment approval to determine whether there is a reasonable apprehension of bias by the BC Environmental Assessment Agency, Minister Rich Coleman, and Minister Mary Polak.

In a little over four days, more than 1,455 people have participated in the boycott of the BC EAO's public comment period for the amendment to Woodfibre LNG's environmental assessment certificate. I attach the names and postal codes of everyone that has expressed their dissatisfaction with this broken and potentially corrupt environmental assessment process.

*Data downloaded at 11: 50 pm on March 11<sup>th</sup>, 2017*

We ask that the Provincial and Federal Environmental Assessment Certificates issued for the Woodfibre LNG be suspended until an independent legal review is conducted to determine whether there is a reasonable apprehension of bias by the BC Environmental Assessment Agency, Minister Rich Coleman, and Minister Mary Polak.

Sincerely,

**Tracey Saxby**

**Co-Founder**

**My Sea to Sky**

**E: [tracey@myseatosky.org](mailto:tracey@myseatosky.org)**

**P: (604) 892-5096**

**Cc:**

The Right Hon. Justin Trudeau	Prime Minister of Canada
The Honourable Catherine McKenna	Minister of Environment and Climate Change
The Honourable Dominic LeBlanc	Minister of Fisheries, Oceans and the Canadian Coast Guard
The Honourable Marc Garneau	Minister of Transport
The Honourable Christy Clark	Premier of British Columbia
The Honourable Rich Coleman	BC Minister of Natural Gas Development
The Honourable Mary Polak	BC Minister of the Environment
Pamela Goldsmith-Jones	MP for West Vancouver—Sunshine Coast—Sea to Sky
Jonathan Wilkinson	MP for North Vancouver
Hedy Fry	MP for Vancouver Centre
Joyce Murray	MP for Vancouver—Quadra
Sheila Malcolmson	MP for Nanaimo—Ladysmith
Kennedy Stewart	MP for Burnaby South



Ken Hardie	MP for Fleetwood—Port Kells
Elizabeth May	MP for Saanich—Gulf Islands
Fin Donnelly	MP for Port Moody—Coquitlam
Jordan Sturdy	MLA for West Vancouver—Sea-to-Sky
Nicholas Simons	MLA for Powell River—Sunshine Coast
David Eby	MLA for Vancouver—Point Grey
Ralph Sultan	MLA for West Vancouver—Capilano
Sam Sullivan	MLA for Vancouver—False Creek
Spencer Chandra Herbert	MLA for Vancouver—West End
Naomi Yamamoto	MLA for North Vancouver—Lonsdale
George Heymans	MLA for Vancouver—Fairview
Adrian Dix	MLA for Vancouver—Kingsway

## Woodfibre LNG donations to BC Liberals

Date	Donation	Donor Name	
2013-07-10	\$600.00	Byng Giraud	
2014-01-01	\$1,500.00	Byng Giraud	
2014-01-01	\$120.00	Byng Giraud	
2014-03-25	\$10,000.00	WOODFIBRE NATURAL GAS LTD	
2014-03-31	\$10.00	Marian Ngo	
2014-04-14	\$1,000.00	WOODFIBRE NATURAL GAS LTD	
2014-04-30	\$1,500.00	Thomas Sewell Byng Giraud	
2014-04-30	\$225.00	Marian Ngo	
2014-05-23	\$230.00	Marian Ngo	
2014-05-31	\$20.00	Marian Ngo	
2014-07-31	\$1,000.00	Marian Ngo	
2014-09-24	\$3,500.00	WOODFIBRE NATURAL GAS LTD	
2014-09-24	\$3,500.00	WOODFIBRE NATURAL GAS LTD	
2014-09-30	\$2,500.00	Thomas Sewell Byng Giraud	
2014-10-24	\$5,000.00	WOODFIBRE LGN LTD	*Note typo. Listed as Woodfibre LGN LTD
2014-10-24	\$304.36	Thomas Sewell Byng Giraud	
2014-10-31	\$4,500.00	Thomas Sewell Byng Giraud	
2014-10-31	\$1,200.00	Thomas Sewell Byng Giraud	
2014-11-14	\$5,000.00	WOODFIBRE LGN LTD	*Note typo. Listed as Woodfibre LGN LTD
2014-11-30	\$1,500.00	Thomas Sewell Byng Giraud	
2015-01-31	\$1,000.00	Thomas Sewell Byng Giraud	
2015-01-31	\$250.00	Marian Ngo	
2015-02-13	\$3,500.00	WOODFIBRE LNG LTD	
2015-03-24	\$5,000.00	WOODFIBRE LNG LTD	
2015-04-30	\$150.00	Thomas Sewell Byng Giraud	
2015-05-01	\$10,000.00	WOODFIBRE LNG LTD	
2015-05-31	\$1,000.00	Marian Ngo	

2015-06-30	\$1,000.00	Thomas Sewell Byng Giraud
2015-07-31	\$3,500.00	WOODFIBRE LNG LTD
2015-07-31	\$3,500.00	WOODFIBRE LNG LTD
2015-08-31	\$10,000.00	Thomas Sewell Byng Giraud
2015-09-30	\$1,200.00	Thomas Sewell Byng Giraud
2015-11-25	\$5,000.00	WOODFIBRE LNG LTD
2015-11-30	\$1,800.00	Byng Giraud
2016-01-01	\$2,500.00	Thomas Sewell Byng Giraud
2016-02-29	\$1,500.00	Byng Giraud
2016-03-31	\$8,000.00	Marian Ngo
2016-04-22	\$10,000.00	Woodfibre LNG Ltd.
2016-04-30	\$125.00	Marian Ngo
2016-06-24	\$1,000.00	Woodfibre LNG Ltd.
2016-06-30	\$3,500.00	Marian Ngo
2016-07-19	\$1,000.00	Byng Giraud
2016-09-30	\$10,225.00	Byng Giraud
2016-09-30	\$2,000.00	Marian Ngo
2016-10-30	\$4,425.00	Marian Ngo
2016-11-15	\$5,000.00	Woodfibre LNG Ltd.
2016-11-30	\$3,050.00	Byng Giraud
2016-11-30	\$5,000.00	Marian Ngo
2016-12-22	\$5,000.00	Woodfibre LNG Ltd.
2017-01-13	\$2,500.00	Marian Ngo
2017-01-18	\$7,500.00	Woodfibre LNG Ltd.
2017-02-08	\$4,500.00	Woodfibre LNG Ltd.
	<b>\$91,500.00</b>	Total donations from Woodfibre LNG
	<b>\$47,149.36</b>	Total donations from Byng Giraud
	<b>\$28,285.00</b>	Total donations from Marian Ngo
<b>TOTAL</b>	<b>\$166,934.36</b>	



SOURCES:	<a href="#">Elections BC contributions database</a>		
	<a href="#">BC Liberal disclosure site</a>		
SEARCH TERMS:	Woodfibre		
	Byng		
	Ngo		

## List of Woodfibre LNG registered lobbyists

Woodfibre LNG Lobbyist	Company	Registration
Mike Drummond	Earnscliffe BC Inc.	1 of 2 (2016-01-18 to 2016-01-27)
		2 of 2 (2016-01-27 to 2016-06-01)
Sarah Goldfeder	Earnscliffe Strategy Group	1 of 1 (2016-01-26 to 2016-08-02)
Velma McColl	Earnscliffe Strategy Group	1 of 1 (2016-01-25 to 2016-08-02)
Kim Baird	Hill+Knowlton Canada	1 of 2 (2015-04-08 to 2015-09-21)
		2 of 2 (2015-09-21 to 2016-08-25)
Mark Cameron	Hill+Knowlton Strategies	1 of 3 (2014-09-22 to 2014-12-15)
		2 of 3 (2014-12-15 to 2014-12-15)
		3 of 3 (2014-12-15 to 2015-06-25)
Ryan Kelahear	Hill+Knowlton Strategies	1 of 2 (2014-09-08 to 2014-09-08)
		2 of 2 (2014-09-08 to 2015-03-01)
Jack Hughes	Hill+Knowlton Strategies Canada	1 of 1 (2015-06-16 to 2015-07-06)
Ryan Clarke	Hill+Knowlton Strategies	1 of 1 (2015-06-25 to 2015-07-02)
Mathew Klie-Cribb	NATIONAL Public Relations	1 of 3 (2015-04-01 to 2015-06-29)
		2 of 3 (2015-06-29 to 2015-10-29)
		3 of 3 (2015-10-29 to 2016-04-18)
Joseph Finkle	NATIONAL Public Relations	1 of 1 (2015-04-02 to 2016-04-18)
Christopher Froggatt	NATIONAL Public Relations	1 of 1 (2015-11-18 to 2016-04-18)
Megan Buttle	NATIONAL Public Relations	1 of 1 (2015-11-11 to 2016-01-22)
Stephanie Mitton	NATIONAL Public Relations	1 of 1 (2015-04-02 to 2015-05-15)
Dan Seekings	Global Public Affairs	1 of 1 (2014-02-12 to 2015-01-02)
Katherine Preiss	Global Public Affairs Inc	1 of 1 (2013-11-26 to 2014-11-02)
*Data sourced from <a href="https://lobbycanada.gc.ca/app/secure/ocl/lrs/do/advSrch">https://lobbycanada.gc.ca/app/secure/ocl/lrs/do/advSrch</a>		

## Donations to BC Liberals by Woodfibre LNG lobbyists

Date	Donation	Donor Name
2015-04-30	\$4,500.00	GLOBAL PUBLIC AFFAIRS INC
2015-03-31	\$4,500.00	Kim Baird
2016-02-29	\$5,000.00	Kim Baird Strategic Consulting
2016-01-31	\$350.00	Earnscliffe Strategy Group Inc
2016-02-29	\$500.00	Earnscliffe Strategy Group Inc
2016-03-31	\$1,125.00	Earnscliffe Strategy Group Inc
2016-04-15	\$4,900.00	Earnscliffe Strategy Group Inc
2016-04-30	\$150.00	Earnscliffe Strategy Group Inc
2016-05-06	\$2,500.00	Earnscliffe Strategy Group Inc
2016-06-30	\$4,000.00	Earnscliffe Strategy Group Inc
2015-06-12	\$2,500.00	NATIONAL PUBLIC RELATIONS (VANCOUVER) INC
2015-06-12	\$4,500.00	NATIONAL PUBLIC RELATIONS (VANCOUVER) INC
2015-09-29	\$4,500.00	NATIONAL PUBLIC RELATIONS INC
2015-12-02	\$600.00	NATIONAL PUBLIC RELATIONS (VANCOUVER) INC
2016-01-22	\$1,250.00	National Public Relations (Vancouver) Inc
2016-01-31	\$475.00	National Public Relations (Vancouver) Inc
2016-04-15	\$5,000.00	National Public Relations (Vancouver) Inc
<b>TOTAL</b>	<b>\$46,350.00</b>	
SOURCES:	<a href="#">Elections BC contributions database</a>	
	<a href="#">BC Liberal disclosure site</a>	

**Location of people that participated in boycott of Woodfibre LNG's recent public comment period, March 2017.**

<b>Location Participants</b>	
GVRD	540
Squamish	369
Vancouver Island	195
Sunshine Coast	142
Bowen Island	73
Whistler	53
Lions Bay	32
Pemberton	6
Elsewhere in BC	97
Out of Province	34
OVERSEAS	12
Unknown	5
<b>TOTAL</b>	<b>1558</b>

Abbotsford	4
Aldergrove	1
Burnaby	27
Chilliwack	6
Coquitlam	16
Delta	8
Langley	8
Maple Ridge	18
Mission	6
New Westminister	11
North Vancouver	65
Pitt Meadows	2
Port Coquitlam	2
Port Moody	8
Richmond	10
Surrey	34
Vancouver	226
West Vancouver	78
White Rock	10
<b>GVRD TOTAL</b>	<b>540</b>

**NOTE: This number is higher than the 1,455 listed above as more people continue to participate in the boycott.**

*Data downloaded Monday 13th March*