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November 05, 2022

Competition Bureau

Cc: RBC – Royal Bank of Canada
Canada Revenue Agency, Charities Directorate
Office of the Superintendent of Financial Institutions

OPEN LETTER TO THE COMPETITION BUREAU

To Whom it May Concern:

RE: “Greenwashing” Complaint Filed Against RBC by Ecojustice and Stand.Earth on behalf of Six Canadians is Scientifically Unfounded

Based on a number of articles in the press, we have become aware of the aforementioned complaint filed by Ecojustice and Stand.Earth against Royal Bank of Canada (RBC). We believe this to be a matter of public interest, thus we provide this Open Letter. As we have previously been the target of a similar nuisance complaint by Ecojustice in 2015,¹ with similarly false or exaggerated climate and energy claims, we would like to provide the public and the parties involved with climate insights which, in our opinion, **render this complaint invalid. The material in this letter is deliberately presented in a plain language style.**

We are acting independently in this matter. We declare no Conflicts of Interest. Our concern is the safety and well-being of Canadian citizens, our economy, and rational energy and climate policymaking over NetZero ideology, which has often been driven by the foreign funding of environmental groups.

Advertising Themes and Memes vs “Truth in Advertising”

Ecojustice complainants claim that RBC is misleading the public by branding themselves with the use of “Net Zero” terminology in their advertising and therefore, Ecojustice reasons, the Competition Bureau should take action against RBC for ‘greenwashing’ the public. However, as the following paragraph by energy expert, Prof. Emeritus Vaclav Smil reveals, no party will be reaching NetZero in reality by 2030 or 2050 (though perhaps through carbon trading this NetZero goal could be achieved *fictitiously* – aka ‘greenwashing’).

Designing hypothetical roadmaps outlining complete elimination of fossil carbon from the global energy supply by 2050 is nothing but an exercise in wishful thinking that ignores fundamental physical realities. And it is no less unrealistic to propose legislation, as has been done in the US Congress, claiming that such a shift can be accomplished in the US by 2030. Such claims are

¹ <https://www.nationalobserver.com/2015/12/03/news/breaking-ecojustice-files-complaint-competition-bureau-against-climate-denial-groups>

simply too extreme to be defended as aspirational. The complete decarbonization of the global energy supply will be an extremely challenging undertaking of an unprecedented scale and complexity that will not be accomplished—even in the case of sustained, dedicated and extraordinarily costly commitment—in a matter of a few decades. – Vaclav Smil²

As in many advertising contexts, RBC's material under complaint appears to be *compliant with popular government/regulatory themes. None of these parties will meet NetZero targets either.*

If we are looking for 'truth' then brand advertising is not the right place to look. For instance, Ecojustice advertises itself as a 'charity', but this can hardly be called charitable activity. Merriam Webster Dictionary³ describes charitable activity as:

Definition of charity

1a: generosity and helpfulness especially toward the needy or suffering

b: an institution engaged in relief of the poor

c: public provision for the relief of the needy

2: benevolent goodwill toward or love of humanity

3a: a gift for public benevolent purposes

b: an institution (such as a hospital) founded by such a gift

4: lenient judgment of others

The evidence we show will confirm the following:

- a. **NetZero emissions reduction targets are unattainable** in the proposed time frames of 2030/2050.
- b. **NetZero emissions reduction targets need not be met as there is no climate emergency;** prominent scientific studies have been relying on scenarios known as RCP 8.5 and 6 which are deemed to be implausible by qualified scientists.^{4 5 6 7} Once these are removed from climate/emissions calculations, there is no emergency or crisis. We do have time.
- c. **NetZero emissions reductions would not result in the claimed outcomes of controlling Earth's temperature** or reducing extreme weather or wildfire events.
- d. **There would be deadly consequences for Canadian citizens** through concerted efforts to meet NetZero emissions reductions in the time frames proposed and with the methods/mitigations proposed by environmental groups and climate activists. There would also be deadly consequences for the world's vulnerable who rely on Canadian fertilizer production and our agricultural sector, particularly wheat and grain exports.

² <https://www.schoolofpublicpolicy.sk.ca/research/publications/policy-brief/what-we-need-to-know-about-the-pace-of-decarbonization.php>

³ <https://www.merriam-webster.com/dictionary/charity>

⁴ <https://www.nature.com/articles/d41586-020-00177-3>

⁵ <https://issues.org/climate-change-scenarios-lost-touch-reality-pielke-ritchie/>

⁶ <https://judithcurry.com/2015/12/13/a-closer-look-at-scenario-rcp8-5/>

⁷ <https://www.sciencedirect.com/science/article/abs/pii/S2214629620304655>

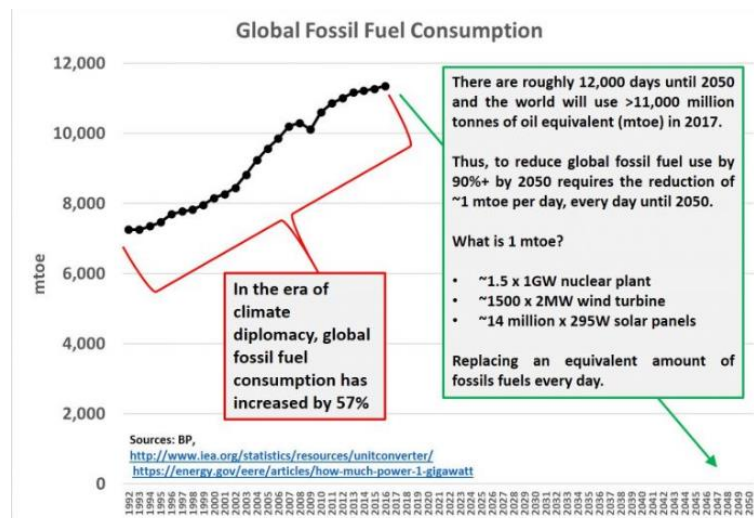
- e. **NetZero emissions reduction targets, or any such targets are impossible to meet when Canada is accepting 400,000 immigrants per year, and with a stated goal of the Century Initiative of adding 63 million people to Canada’s population by 2100.**
- f. **Banks and corporations have been subjected to undue influence and coercion to engage in this NetZero activity and on climate risk reporting. This is where the real greenwashing occurs.** Many CEOs, like Jamie Dimon of JP Morgan are coming to their senses:

And then there is the prospect of shareholder lawsuits if you just thumb your nose at profitable business:
Banks may not have originally understood the full litigation risks tied to signing net-zero commitments.

Some of the executives of these companies may have even figured out that intermittent renewable energy sources don’t really work to power a modern economy, although I haven’t seen any of them say exactly that. The one who has gotten closest is Jamie Dimon of JP Morgan, who was [asked by Representative Rashida Tlaib at a Congressional hearing on September 22](#) whether he would “commit to stop funding new fossil fuel projects.” He responded: “*Absolutely not, and that would be the road to hell for America.*” Finally, a little backbone.⁸

Supporting Material

- a. **NetZero emissions reduction targets are unattainable in the proposed time frames of 2030/2050.** This is self-evident from the following graph.



⁸ https://www.manhattancontrarian.com/blog/2022-10-14-some-banks-and-energy-companies-finally-starting-to-get-some-backbone?mc_cid=824d9f1352&mc_eid=7679c5335e

The only ‘emissions-free’ power generation comes from nuclear or hydro (the facilities for which can only be produced with large, embedded emissions). Wind and solar must be backed-up with conventional dispatchable power generation, typical a Combined Cycle Natural Gas plant.⁹

Likewise, wind and solar devices are made from extremely copious quantities of oil, natural gas, and coal. Thus, any build out of so-called ‘renewables’ will automatically result in substantial increases in the demand for oil, natural gas, and coal, as we pointed out to Ecojustice in 2016 in our video “[False Choice Cafe](#).” There will also be the matter of *enormous embedded emissions* – emissions related to the construction, transport, installation and operation of ‘climate solutions.’

RBC appears to have positioned itself well to both provide these important fossil fuel energy resources for the effort of expanding renewable infrastructure, and to provide substantial returns to its shareholders, the first mandate of any business operation.

Despite Ecojustice claiming that fossil fuels must be phased out, under NetZero designations, some fossil fuels are still allowable. Much of the NetZero process will NOT be related to reducing emissions but rather to the establishment of global carbon trading markets, as envisioned by the ClimateWorks Foundation partners who are the funders of many of these environmental groups.¹⁰ As per the WEF-associated “1-Trillion Tree” program, this will entail offsetting emissions through the planting of trees or purchasing of Nature-Based carbon credits, creating new kinds of carbon molecule counting jobs and revenue streams for various accounting firms. This activity entails *‘the lack of delivery of an invisible substance to no one’* which should surely be on the Competition Bureau’s radar as a questionable form of greenwashing.¹¹

All banks use tremendous amounts of oil, natural gas, and coal in the creation and operation of their supercomputer systems, the networks, the related IT infrastructure, and energy use in general. Ecojustice is essentially demanding that RBC go out of business to save the planet. This is nonsense.

Even the Bank of Canada makes the fatuous claim that it will be “*transitioning to 100 percent clean electricity by 2022*” ... and “*achieving net zero emissions by 2050*”¹²

The IEA graph that follows represents Canada’s electricity generation by source. Bank of Canada must mean they are buying carbon credits – aka ‘greenwashing.’ Wind and solar must be backed up by conventional power, typically natural gas. Wind’s contribution to electrical generation in Canada is negligible. Solar is barely visible on this graph. Our present grid and

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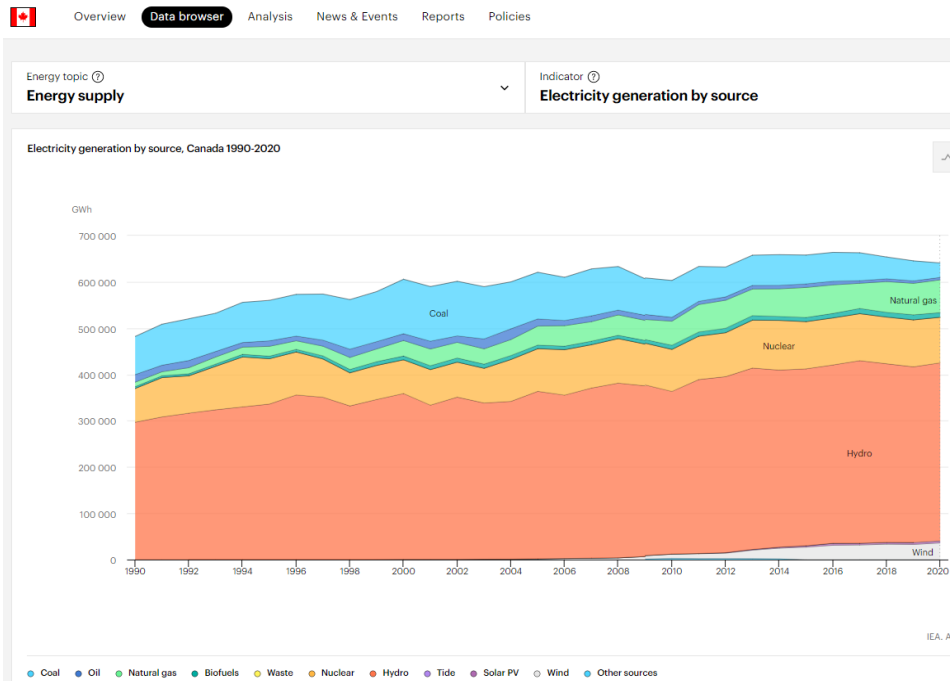
<https://www.eia.gov/todayinenergy/detail.php?id=52778#:~:text=Combined%20cycle%20systems%20have%20multiple,turbine%20to%20generate%20electric%20power.>

¹⁰ https://web.northeastern.edu/matthewnisbet/wp-content/uploads/2018/05/Nisbet2018_ClimatePhilanthropy_WIREsClimateChange_Final.pdf

¹¹ <https://climatechange101.ca/wp-content/uploads/2021/03/Conning-the-Climate.pdf>

¹² <https://www.bankofcanada.ca/publications/annual-reports-quarterly-financial-reports/annual-report-2020/global-engagement/in-focus-climate-change/>

infrastructure took over 100 years to build. As explained in the opening quote by Prof. Emeritus Vaclav Smil, it is delusional to think this can be radically changed within a few years. Further confirmation of the delusional thought that decarbonization can happen overnight or that NetZero targets can be hit is found in this analysis of the 20-year full-scale lab experiment in the European Union. Decarbonization is a failure.¹³



- b. **NetZero emissions reduction targets need not be met as there is no climate emergency;** prominent scientific studies have been relying on scenarios known as **RCP 8.5 and 6** which are **deemed to be implausible by credible scientists**. Once these scenarios are removed from climate/emissions calculations, there is no emergency or crisis. We do have time.

Ecojustice claims in its call for inquiry that ‘we only have 10 years left,’ referencing the IPCC Special Report (SR1.5). In fact, the report does not say this:

AP **AP FACT CHECK: O'Rourke on climate, Trump on 'no collusion'**

THE FACTS: There is no scientific consensus, much less unanimity, that the planet only has 12 years to fix the problem.

A report by the United Nations Intergovernmental Panel on Climate Change, drawn from the work of hundreds of scientists, uses 2030 as a prominent benchmark because signatories to the Paris agreement have pledged emission cuts by then. But it's not a last chance, hard deadline for action, as it has been interpreted in some quarters.

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“Glad to clear this up,” James Skea, co-chairman of the report and professor of sustainable energy at Imperial College London, told The Associated Press. The panel “did not say we have 12 years left to save the world.”

He added: “The hotter it gets, the worse it gets, but there is no cliff edge.”

“This has been a persistent source of confusion,” agreed Kristie L. Ebi, director of the Center for Health and the Global Environment at the University of Washington in Seattle. “The report never said we only have 12 years left.”

¹³ <https://blog.friendsofscience.org/2022/06/16/decarbonizing-electricity-in-the-european-union-a-programmed-failure-demonstrated-by-the-figures/>

Ecojustice also claims the Paris Agreement is a legally binding treaty. This is untrue. It is a purely voluntary agreement with the requirement to simply report on GHG reduction plans every 5 years. According to Robert Lyman, a 27-year veteran federal public servant and diplomat of 10 years, who spent much of his career on the GHG/Kyoto-related file, as he writes in his report "[Litigating Climate in Canada](#)":

*Canada ratified the Paris Agreement on October 5, 2016. Canada's treaty obligations under that Agreement **do not include any requirement that Canada:***

- *meet any specific GHG emissions reduction target;*
- *pay any penalty if it fails to meet its voluntary emissions reductions targets;*
- *pay any specific amount or share of the collective financing for developing countries;*
- *use any specific set of policy instruments (e.g. taxes, regulations, subsidies, etc.) in pursuing its voluntary emissions reductions goals.*

The only reason developing nations signed on to the agreement is that they were promised access to a \$100 billion/yr. Green Climate Fund, to be funded by developed nations. This promise has never been fulfilled and most nations like China and India continue providing their people with reliable, affordable energy from conventional sources, particularly coal with no intention to 'reach NetZero.'

Canada could stop producing any emissions tomorrow and there would be no measurable reduction in global emissions.¹⁴

A recent [presentation by Roger Pielke, Jr.](#) shows that the climate emergency scenarios come from the misuse of scenarios RCP 8.5 and 6¹⁵ – as if 'business-as-usual' – which are implausible. He is a long-time climate policy analyst; his work is cited by the Intergovernmental Panel on Climate Change (IPCC), and he has worked with the insurance industry for about 25 years on damage and loss. His presentation also addresses common 'increasing disaster' claims made by media and groups like Ecojustice, showing that they are wrong.

Canadian GHG emissions constitute a tiny part of global GHG emissions

In 2019, Canada carbon dioxide (CO₂) emissions were 556 megatonnes (Mt) which is equal to 1.6 per cent of global emissions.

China's CO₂ emissions in 2019 were 9,826 Mt (according to British Petroleum data). In other words, China emits in one month (819 Mt/month) about what Canada emits in one and a half years. The average growth in emissions in China over the past decade is 212 Mt per year. Thus, Canada's annual CO₂ emissions represent only 2.6 times China's emissions *growth*. **If someone could instantaneously wipe Canada off the map, so that it produced zero emissions forever after, this would have a modest-to-negligible effect on global carbon dioxide concentrations in the atmosphere in 2100, and it would make no difference whatsoever as to whether the IPCC emissions reduction targets (i.e. 1.5 degrees or 2 degrees C.) were met.**

Let that sink in.

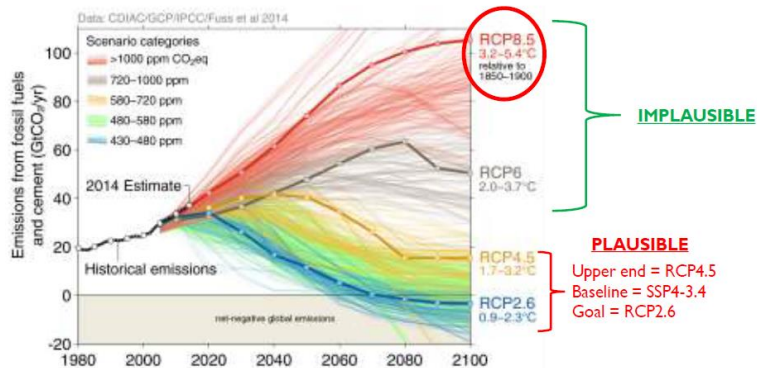


Image licensed from Shutterstock.

¹⁴ <https://blog.friendsofscience.org/wp-content/uploads/2020/08/Futile-Folly-aug-2020-Reissued-FINAL.pdf>

¹⁵ RCP refers to 'Representative Concentration Pathways' – referring to the concentration of carbon dioxide in the atmosphere and its presumed impact on global warming. These are computer simulations meant for research purposes; they were never meant as optional policy pathways. Van Vuuren et al 2011 <https://link.springer.com/article/10.1007/s10584-011-0148-z>

Representative Concentration Pathway Scenarios 4 of the 1,184 AR5 Scenarios



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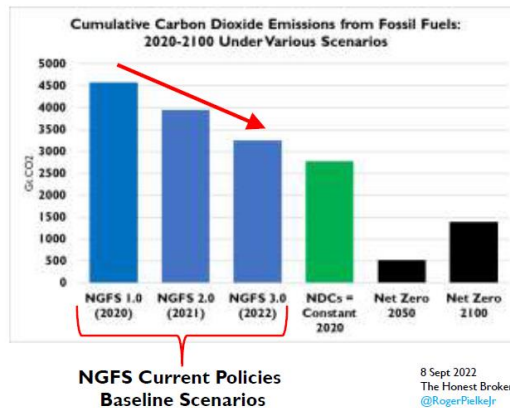
Sources: Pielke et al. 2022, Burgess et al. 2022, Pielke and Ritchie 2021, Burgess et al. 2020

Roger Pielke, Jr. also points out that the banking sector's Network for Greening the Financial System (NGFS) scenarios for climate stress-testing are **wildly implausible**.

For example

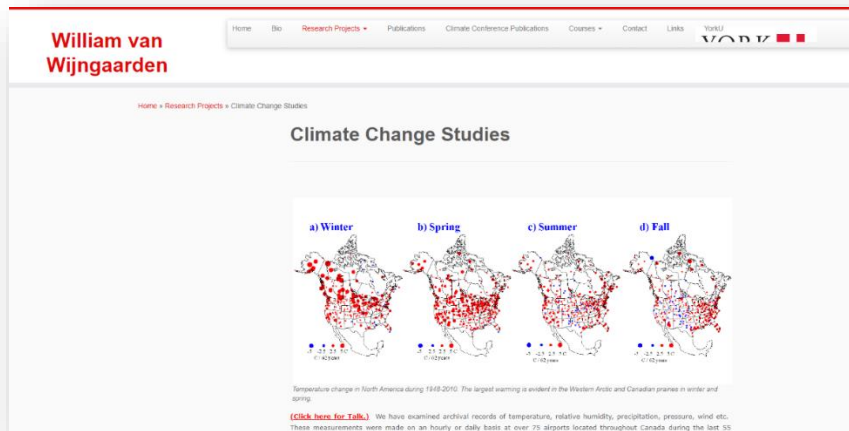
Scenarios used in climate stress-testing by central banks around the world are **wildly implausible & of questionable practical utility**

In recent years they have been moved toward **plausibility, but not nearly enough**



 University of Colorado **Boulder**

- c. **NetZero emissions reductions would not result in the claimed outcomes of controlling Earth's temperature or reducing extreme weather or wildfire events.**



<https://wvanwijngaarden.info.yorku.ca/research-projects/climatechangestudies/>

Canada is experiencing some warming across the north – in WINTER. This is beneficial to our economy.¹⁶ However, as Prof. William van Wijngaarden and Prof. William Happer show in this study,^{17 18} carbon dioxide is not the control knob that drives climate change. Both Prof. Wijngaarden and Happer are signatories to the CLINTEL World Climate Declaration, that there is no climate emergency and that natural factors are more influential on climate than human industrial emissions.¹⁹ Dr. Judith Curry came to the same conclusion in 2014 in her testimony to the US Senate.²⁰ The IPCC AR5 report noted that there had been no statistically significant warming since before the 1997 Kyoto Accord (forerunner to Paris Agreement), despite a very steep rise in carbon dioxide concentration from human industrial emissions.

¹⁶ <https://blog.friendsofscience.org/2021/05/28/social-cost-benefit-of-carbon-dioxide-from-fund-with-corrected-temperatures-energy-and-co2-fertilization/>

¹⁷ <https://blog.friendsofscience.org/2022/07/04/according-to-the-physicist-w-happer-there-will-be-little-effect-for-a-doubling-of-the-rate-of-co2/?highlight=william%20happer> (plain language with French language original)

¹⁸ <https://arxiv.org/abs/2006.03098>

¹⁹ <https://clintel.org/world-climate-declaration/>

²⁰ From Curry's testimony: "The premise of President Obama's Climate Action Plan is that there is an overwhelming judgment of science that anthropogenic global warming is already producing devastating impacts, which is summarized by this statement from the President's Second Inaugural Address:

Some may still deny the overwhelming judgment of science, but none can avoid the devastating impact of raging fires and crippling drought and more powerful storms.

This premise is not strongly supported by the scientific evidence: (bold added)

- the science of climate change is not settled, and evidence reported by the IPCC AR5 weakens the case for human factors dominating climate change in the 20th and early 21st centuries

- with the 15+ year hiatus in global warming, there is growing appreciation for the importance of natural climate variability

- **the IPCC AR5 and SREX find little evidence that supports an increase in most extreme weather events that can be attributed to humans, and weather extremes in the U.S. were generally worse in the 1930's and 1950's than in recent decades. (bold added)**

Not only is more research needed to clarify the sensitivity of climate to carbon dioxide and understand the limitations of climate models, but more research is needed on solar variability, sun-climate connections, natural internal climate variability and the climate dynamics of extreme weather events." <https://judithcurry.com/wp-content/uploads/2014/01/curry-senatetestimony-2014-final.pdf>

Box 9.2 | Climate Models and the Hiatus in Global Mean Surface Warming of the Past 15 Years

The observed global mean surface temperature (GMST) has shown a much smaller increasing linear trend over the past 15 years than over the past 30 to 60 years (Section 2.4.3, Figure 2.20, Table 2.7; Figure 9.8; Box 9.2 Figure 1a, c). Depending on the observational data set, the GMST trend over 1998–2012 is estimated to be around one-third to one-half of the trend over 1951–2012 (Section 2.4.3, Table 2.7; Box 9.2 Figure 1a, c). For example, in HadCRUT4 the trend is 0.04°C per decade over 1998–2012, compared to 0.11°C per decade over 1951–2012. The reduction in observed GMST trend is most marked in Northern Hemisphere winter (Section 2.4.3; Cohen et al., 2012). Even with this “hiatus” in GMST trend, the decade of the 2000s has been the warmest in the instrumental record of GMST (Section 2.4.3, Figure 2.19). Nevertheless, the occurrence of the hiatus in GMST trend during the past 15 years raises the two related questions of what has caused it and whether climate models are able to reproduce it.

The IPCC has also stated clearly that future climate is unknowable.

"In climate research and modelling, we should recognize that we are dealing with a coupled non-linear chaotic system, and therefore that long-term prediction of future climate states is not possible."

~ The Intergovernmental Panel on Climate Change ~
(IPCC)

Third Assessment Report (2001)
Section 14.2.2.2, page 774

Consequently, RBC cannot forecast future ‘climate risks’ and, as shown, carbon dioxide emissions from fossil fuels are not the main drivers of climate change. As we have noted in previous reports, businesses should focus on their core operations, rather than attempting to venture into ‘climate astrology.’²¹ As we explained our concerns in our 2017 letter to the Ontario Securities Commission, mandatory climate risk reporting,²² driven largely by activist investors of the unelected, unaccountable UNPRI, provides opportunities for reputational attacks and vulture investor actions that are detrimental to shareholders, the market, and the public at large.²³ This is self-evident today in the global energy crisis, which has been created by NetZero activists and the divestment movement. There is evidence that competitor nations like Russia have been involved in the direct or indirect funding of environmental and climate activists.²⁴ There is evidence that environmental and climate activist groups have been funded by parties interested in commercial ‘green’ opportunities, surely an issue for the Competition Bureau to consider.^{25 26 27}

²¹ <https://blog.friendsofscience.org/2017/02/01/new-reports-challenge-share-on-climate-change-risk-and-denial-for-pension-fund-trustees-and-corporate-boards/>

²² <https://blog.friendsofscience.org/2017/08/30/letter-to-ontario-securities-commission-in-response-to-the-unpri-letter-on-climate-disclosure-review/>

²³ <https://blog.friendsofscience.org/2017/08/30/letter-to-ontario-securities-commission-in-response-to-the-unpri-letter-on-climate-disclosure-review/>

²⁴ <https://blog.friendsofscience.org/2022/03/07/have-environmentalists-been-financed-by-russia/>

²⁵ <https://www.heartland.org/publications-resources/publications/the-chain-of-environmental-command-how-a-club-of-billionaires-and-their-foundations-control-the-environmental-movement-and-obamas-epa-1>

²⁶ <https://blog.friendsofscience.org/2021/11/02/has-no-one-read-the-deloitte-report/>

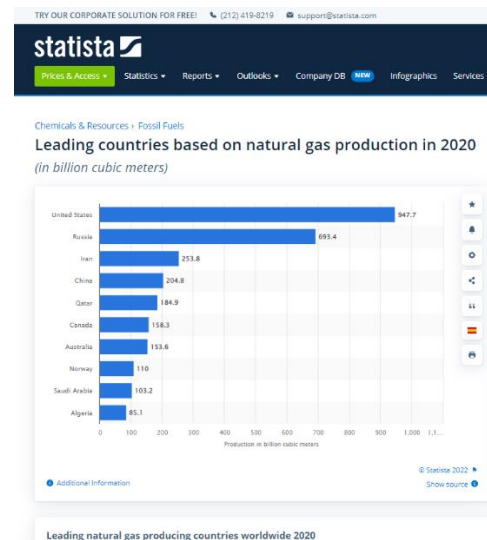
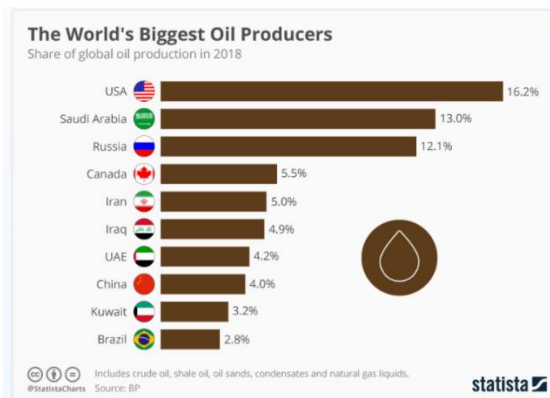
²⁷ <https://blog.friendsofscience.org/2019/05/07/environmental-charities-a-compilation-of-reports-on-their-finance-power-and-implications-for-canada/>

Funding to Greenpeace:

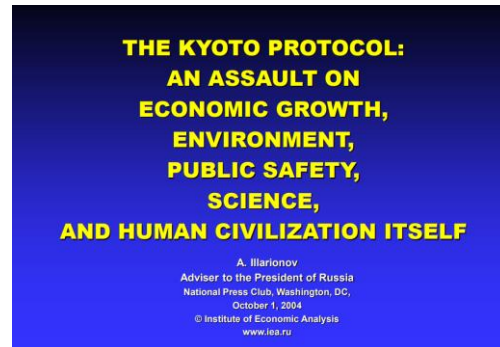
In 2010 Oak provided them a further \$424,373:

“To create awareness of the financial, regulatory and political uncertainty that surrounds investments in the tar sands so that prominent financial analysts, media, opinion leaders and Members of Parliament will publically express concern about the lack of government regulation of the tar sands industry. Greenpeace Canada aims to publicise the controversy around the tar sands both within and outside Canada. This will encourage the withdrawal of major institutional investors from the tar sands by 2012; the end of France’s tar sands subsidies; and the passage of a feed-in-tariff in Alberta utilised by farmers, ranchers, landowners and investors to develop the province’s huge wind power potential.”

It appears that this call for inquiry by Ecojustice is simply a further step in the reputational attack on the Alberta oil sands by parties with this long-term mandate to shut down this important Canadian/Albertan industry. Since Canada is one of the top 10 oil and gas producers in the world, there is clearly a Green Trade War being conducted under the cover of a climate crisis. May we note that it is likely most of those involved as climate activists are probably well-meaning, true believers that they are saving the planet; the evidence is clear that our competitor nations or competing foreign corporations or alternative energies are the winners of this Green Trade War against Canadian resources.

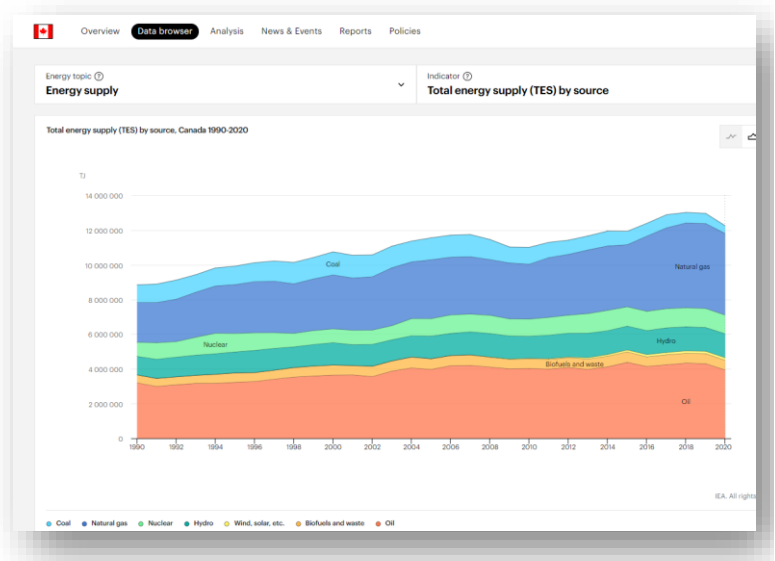


It should be noted that Russia is one of our main global competitors in the energy sector. It is now engaged in a conflict in Ukraine which has resulted first in the constraint of essential natural gas deliveries to Germany (which has no LNG terminals; thus, reliant on pipelines from Russia) and the more recent destruction of the Nord Stream 1 and 2 gas pipelines. The combination of these means **the possible total collapse of the European Union**, massive industrial degrowth (major industries like Acelor-Mittel have closed blast furnaces, BASF may have to shut down its 10 km² Ludwigshafen chemical plant), and there will be extreme risk to human life this winter with heat-or-eat poverty and looming blackouts. It will be worse next winter.²⁸



Russia has never bought into climate change hysteria.²⁹ In fact, they see it as a threat to human civilization. This means their energy rich war machine and society is well-equipped for any confrontation, while the West continues to weaken its own ability to face conflicts or restore economic activity due to energy shortages and ENGO attacks like this reputational attack on RBC and the oil sands, and physical attacks like pipeline Blockadia, and an obsessive-compulsive focus on NetZero climate targets.

- d. **There would be deadly consequences for Canadian citizens** through concerted efforts to meet NetZero emissions reductions in the time frames proposed and with the methods/mitigations proposed by environmental groups and climate activists. There would also be deadly consequences for the world's vulnerable who rely on Canadian fertilizer production and our agricultural sector, particularly wheat and grain exports.³⁰



Like most of the rest of the world, Canada runs on oil, natural gas, and coal. While we do have significant hydro and nuclear resources for electrical generation, wind and solar are not even visible on this graph.

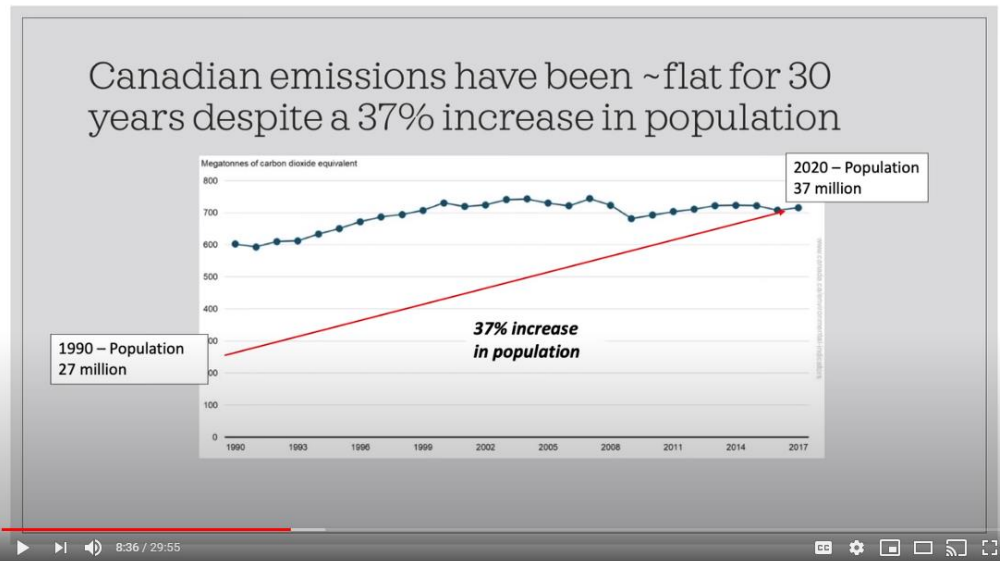
²⁸ <https://time.com/6226587/energy-crisis-next-winter/>

²⁹ <https://blog.friendsofscience.org/2020/09/04/retrospective-the-kyoto-protocol-an-assault-on-economic-growth-environment-public-safety-science-and-human-civilization-itself/?highlight=russia%20kyoto>

³⁰ <https://news.un.org/story/2022/10/1129522>

- e. **NetZero emissions reduction targets, or any such targets are impossible to meet when Canada is accepting 400,000 immigrants per year, and with a stated goal of the Century Initiative³¹ of adding 63 million people to Canada's population by 2100.**

We have written to the Bank of Canada about these conflicting climate/NetZero and immigration policies.³²



³¹ <https://www.centuryinitiative.ca/>

³² <https://blog.friendsofscience.org/2022/05/31/urgent-call-for-review-of-climate-emergency-declaration-evidence-and-conflicting-public-policies-on-ghg-reductions-and-immigration/>

- f. **Banks and corporations have been subjected to undue influence and coercion** to engage in this NetZero activity and on climate risk reporting.

Numerous open letters, point and click campaigns and reports have been issued by the various members of the Strathmere Group. According to research by former international banker, Parker Gallant, the Strathmere Group is made up of ENGO heavyweights:³³

*Pembina Institute, World Wildlife Fund, Ecojustice Canada, Nature Canada, * Sierra Club of Canada, Pollution Probe, Greenpeace, Environmental Defence, Equiterre, David Suzuki Foundation and the Canadian Parks and Wilderness Society.*

**Nature Canada dropped out and [Equiterre](#) (a charity) replaced them and the [Climate Action Network Canada](#) (CAN-RAC), ** a not-for-profit was added.*

Parker Gallant reports on the size and force of this collaboration:

Those on the opposing side of eco-charities and Greenpeace might wonder what is “The Strathmere Group” about and what are the initiatives they plan to develop? Trying to find specific information on the “group” is difficult beyond what the McConnell Foundation has under their grant message. They note the 11 member organizations “have over 358,000 members, 420 staff and annual budgets totaling over \$50 million.”

These parties work together on various projects such as the new \$20 Green bill.³⁴

[Sid Lee](#) agency created a new dollar bill which increases its value if the federal government invests in a green and just recovery. The valuable banknote was designed with a coalition of Canadian grassroots groups including the Green Budget Coalition, the Strathmere Group, CAN-Rac, Corporate Knights, and the Task Force for a Resilient Recovery, led by the [David Suzuki Foundation](#), underlining the real importance of green investments, as the Canadian government plans to rebuild the country’s economy.

And here is Corporate Knights suggesting that the RBC complaint could lead to similar complaints against other banks.³⁵

³³ <https://parkergallantenergyperspectivesblog.wordpress.com/2020/09/08/the-strathmere-group-part-1/> **Climate Action Network Canada is a collective of over 100 ENGOs and unions.

³⁴ <https://www.branding.news/2020/10/13/canadian-20-bill-is-worth-307-85-if-invested-wisely/>

³⁵ <https://www.corporateknights.com/responsible-investing/competition-bureau-rbc-greenwash-probe-banks/>

Questions for the Competition Bureau

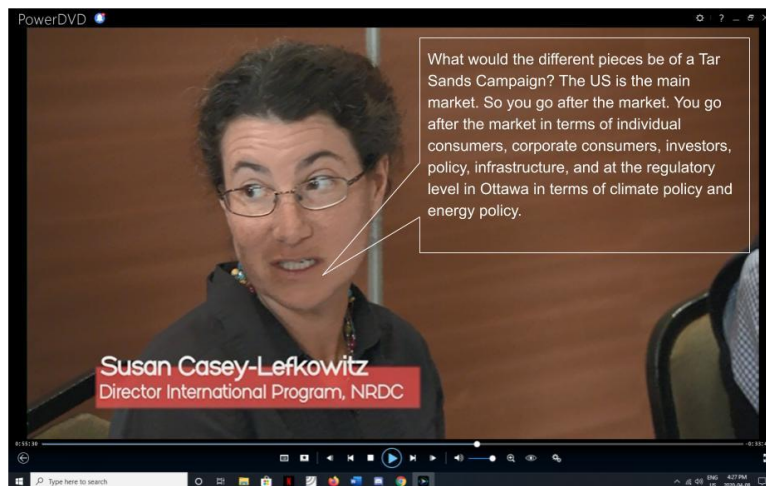
1. Is this call for inquiry a form of brand destruction of RBC, a coercive effort to force mandatory climate risk reporting on RBC or all banks?

We note that in April of this year, Environmental Defense Fund, Ecojustice and “Shift” (a subset of TIDES/MakeWay) [engaged with the Office of the Superintendent of Financial Institutions](#) on the matter of making climate risk reporting mandatory for banks.

All three of these organizations have been linked to the Tar Sands Campaign in public documents and two are linked to the Strathmere Group reference above.

The objective of the Tar Sands Campaign, as stated in the Corporate Ethics strategy document, was to entirely shut down the oil sands.³⁶ Forcing banks to stop financing operations would do that.

The long-term goal of this campaign is to accelerate the shift in Canada and the U.S. towards clean energy and lower energy consumption. We believe this can be achieved through a combination of cap and trade legislation to internalize carbon costs, carbon taxes, large government investments in clean energy technology development, incentives for energy conservation, and rapid deceleration of deforestation. With regards to tar sands specifically, our long-term goal is to stop the production of this fuel.



Screenshot from CBC's "The Tipping Point: Age of the Oil Sands" (2011) with NRDC's Canadian coordinator of the Tar Sands Campaign outlining the steps they will take, and have taken, to destroy a key part of Canada's economy.

³⁶ <http://www.offsettingresistance.ca/TarSandsCoalition-StrategyPaper2008.pdf>

It is notable that one of the signatories to the Ecojustice complaint, Eve Saint, is described as:

***Eve Saint** is a Wet'suwet'en Land Defender at the Gidimt'en Checkpoint, and is striving to protect Wet'suwet'en territory and the climate from fossil fuel developments such as the Coastal Gaslink Pipeline, a fracked gas pipeline that is funded in part by RBC. Eve is an RBC client.*

The Coastal Gaslink Pipeline is federally and provincially authorized but has faced direct action attacks and much public shaming in an effort to stop its construction. Indeed, high profile individuals like Mark Ruffalo have come on board with 'celebrity aid' to damage the reputation of Coastal Gaslink Pipeline, RBC, and Canada's energy sector.³⁷ The Tar Sands Campaign strategy documented highlighting the recruitment of celebrities to denigrate the Alberta oil sands. We do not know if Mr. Ruffalo was so recruited or if this is a cause that he supports as an individual.

There are a number of ways to raise the negatives that this campaign will pursue. **Research** is being conducted on the huge volumes of water consumed, poisoned, and released into waterways. **Reports** are being released on the divergence between public opinion and government policy as well as the health and environmental impacts.³ **Direct Actions** are being conducted to draw media attention to government's complicity on environmental issues.⁹ **Celebrity spokespersons**, like Leonardo DiCaprio, are being recruited to lend their "brand" to opponents of tar sands. **Feature stories** in high visibility media will also be critical for telling the negative story. Generating a high negative media profile for tar sands oil is a critical part of the change strategy.

RBC provided Rolling Stone with a practical and thoughtful response, which reflects the reality of the IEA energy graphs shown in this letter and the opening commentary by Prof. Emeritus Vaclav Smil on the energy transition.

We believe climate change is one of the most pressing issues of our time, and everyone has a role to play. But our lives, economies, and security today depend on continued access to energy until alternative sources are feasible. To avoid a global energy and economic crisis, we need to see this transition as moving the dial, not flicking a switch. Narrow, reactive approaches are not solutions. Simply cutting off access to sources of natural gas would destroy communities and cause significant hardship — things we take for granted like heating our homes, transporting food, and the mobility of everyday citizens would be incredibly difficult.

However, climate ideologues are not interested in these realities.

As further evidence of collaboration by various groups against the oil sands and energy sector, coordinated by the Tar Sands Campaign, at the 9th Annual Conference of International Funders for Indigenous Peoples Michael Marx of Corporate Ethics explained the modus operandi of the Tar Sands Campaign and their "Rethink Alberta" campaign to stop the Keystone XL pipeline this way.³⁸

³⁷ <https://www.rollingstone.com/politics/political-commentary/royal-bank-of-canada-to-mark-ruffalo-coastal-gaslink-pipeline-1343197/>

³⁸ <http://www.internationalfunders.org/wp-content/uploads/2014/10/IFIPConferenceReport2010.pdf>

Marx explained that the campaign is about trying to persuade business to stop establishing offices in the province. In addition to billboards, the campaign will draw heavily on social media with a full website, Rethink Alberta, online banner and flash ads on major tourism websites and Google ad buys for search terms like "Alberta" and "tourism" to help direct Internet users to its website. The campaign is expected to go on for several years. "We think it will have implications not just for tourism but also for the willingness of companies to do business there and to establish headquarters or affiliates there," Marx said. A number of U.S. groups are backing the effort, including Rainforest Action Network, Forest Ethics, Global Community Monitor and Friends of the Earth. In Canada, Marx said the campaign would have mostly "silent" supporters, suggesting that was for their protection. "We're expecting a lot of backlash from Alberta," Marx said. According to Marx, the campaign's "big goal" is to end expansion of the oil sands. Key to that, he said, is blocking approval of a \$7 billion pipeline under review by the U.S. Department of State.

Question for the Competition Bureau.

2. Is the Competition Bureau aware that there is often multi-lateral coordination on various environmental/climate campaigns through a group known as the Strathmere Group?

According to Boothroyd Communications, these influential groups have coordinated communication efforts with the media.³⁹

Strathmere Group (Greenpeace, Pembina Institute, WWF-Canada et al): In 2014, we planned and facilitated the Toronto skills-building workshop Campaigns and Communications 2014, where directors from Canada's 12 leading environmental organizations learned from leading market researchers, journalists and organizers, and agreed to work on shared frames and messages in advance of the 2015 federal election.

It is disconcerting to read that one party associated with the complaint against RBC – "Stand.Earth" – formerly known as ForestEthics, has engaged in various demarketing programs through a stated method of "a tremendous amount of negative press and damage to their brand."

"We are going to provide all these companies with the option of doing it the easy way," Paglia said. "If they want to do it the hard way, we can see a tremendous amount of negative press and damage to their brand."⁴⁰

³⁹ <http://www.boothroydco.com/clients-and-projects>

⁴⁰ <https://www.washingtonpost.com/archive/politics/2006/12/07/ad-campaign-wins-one-for-trees-span-classbankheadvictorias-secret-wont-use-paper-from-canadas-boreal-forestsspan/add2947b-7768-4237-b7d7-1fc165934d99/>

Question for the Competition Bureau:

3. Are there any Conflicts of Interests in terms of the petitioners of the complaint?

While Ecojustice claims to act for free on behalf of its clients, there is evidence that other sources provide them with funding. It might be in the interests of the Competition Bureau and the public to have a statement under oath regarding who or what group, if any, might be supporting this particular call for inquiry.

Examples of previous Ecojustice funding from foreign sources:

From 2009 to 2010, Tides USA substantially increased the amounts paid to Canadian groups for the Tar Sands Campaign. From one year to the next, Tides USA tripled its grant to Ecojustice, to US\$150,00 from US\$50,000. Tides USA also tripled funding to the Water Matters Society of Alberta, from to US\$60,00 from US\$22,500. Tides USA also increased funding to Environmental Defence Canada Inc. to US\$250,00 from US\$185,000. Greenpeace Canada got US\$186,000 from Tides USA in 2009 and US\$200,000 in 2010. These grants were specifically for the "Tar Sands Campaign."⁴¹

and

At the end of August 2018, the Federal Court of Appeal ruled in favour of a group of applicants seeking to stall Kinder Morgan Inc.'s Trans Mountain Pipeline project. What wasn't publicly known at the time is that the application had been funded, at least partially, as part of the Tar Sands Campaign.

We know this now because Living Oceans Society, one of the applicants to the Federal Court of Appeal, reported to the Internal Revenue Service in U.S. tax returns that it spent at least US\$63,547 on this litigation. This information did not become publicly available to me until 11 days after the Federal Court of Appeal had ruled.

The origin of the US\$63,547 is not publicly reported, but Living Oceans spent that amount in 2016 on litigation to stop the Trans Mountain pipeline by intervening in its regulatory review and bringing judicial review proceedings.

"The Society worked with non-profit lawyers at Ecojustice to intervene in the regulatory review of the Kinder Morgan Trans Mountain pipeline and tanker project," Living Oceans reported to the IRS.

Ecojustice is the entity that brought the application to the Federal Court of Appeal. Ecojustice is also funded to participate in the Tar Sands Campaign, and has been paid US\$815,000 (2009-2017) via San Francisco-based Tides Foundation for its participation in the Tar Sands Campaign.⁴²

⁴¹ <https://financialpost.com/opinion/vivian-krause-oil-sands-money-trail>

⁴² <https://financialpost.com/opinion/vivian-krause-rachel-notley-the-rockefellers-and-albertas-landlocked-oil>

Question for the Canada Revenue Agency Charities Directorate about the Ecojustice filing for a Competition Bureau Inquiry into RBC on greenwashing on climate change.

1. How is this 'charitable' activity?

Friends of Science Society once made application to become a charity. We were denied on two grounds. The first was that the Canada Revenue Agency deemed our position on climate change to be too one-sided; they required that a more nuanced position be taken rather than our view that the Sun is the main driver of climate change, not carbon dioxide. The second reason was that charitable activities must be local, tangible, and measurable. Climate change is none of these.

The example the CRA provided to us as 'charitable activity' was "the Halifax food bank providing X number of food hampers to X number of Haligonians over a given period of time." This type of description also demonstrates the tangible public 'net benefit' to the community, which is a fundamental premise of a charity under the Charities Directorate guidelines:

The requirement of public benefit involves the application of a two-part test, each part having a somewhat different application to the four categories of charity: ¹⁴

- The first part of the test generally requires that a tangible benefit be conferred, directly or indirectly. (More recently, and in the Canadian context, this requirement has also been described as an "objectively measurable and socially useful benefit" ¹⁵)
- The second part of the test requires that the benefit have a public character, that is, be directed to the public or a sufficient section of the public

The "benefit" aspect of the test concerns whether the charitable purpose under consideration is directed towards achieving a universal good that is not harmful to the public—a socially useful endeavour. The "public" aspect involves an examination of who constitutes the "public." This notion of public benefit has also been called the "public character" of charity, in that it "seeks the welfare of the public; it is not concerned with the conferment of private advantage." ¹⁶

Ecojustice' position on climate change is one-sided. Climate change is not local, tangible, or measurable on human timescales as it is measured over 30, 50, 100 and millennial time scales and includes natural as well as human influences.

In the most recent CRA filings by Ecojustice, there are no program areas given for their operation. In the 2018 filing, the program areas of the charity are described as follows:

2018 Registered charity information return for
ECOJUSTICE CANADA SOCIETY

▼ Basic information sheet

Designation:	Charitable organization
Fiscal Period End:	10 / 31
Registration Date:	1991-01-01
Business/registration number:	134748474 RR 0001
Telephone number:	
Fax number:	
E-mail address:	
Website address:	
Public contact name or position:	
Names the charity is known by other than its registered name:	

Program areas

Rank	Description	Field code	% of emphasis
1	General environmental protection, recycling services	G3	75 %
2	Preservation of species, wildlife protection	G2	20 %
3	Nature, habitat conservation	G1	5 %

Ecojustice stated program areas to CRA (2018):

75% of the emphasis was to go to general environmental protection, recycling services.

20% was to go to preservation of species, wildlife protection.

5% was to go to nature habitat conservation.

Based on this, **it is unclear how this complaint filed with the Competition Bureau against RBC is within the purview of Ecojustice' operations.** Climate change is not a local, tangible, or measurable matter and the complaint does not fit the previously stated program areas of Ecojustice, nor is there any apparent 'charitable' net public benefit to attacking the reputation of one of Canada's top five banks over forms of advertising that virtually every one of the climate virtue-signaling Ad Standards Council members also engages in.

Friends of Science Society's concerns with RBC and banks in general.

In parroting NetZero dogma, RBC appears to simply be following the diktats of the Bank of Canada and activist investors like those of the UNPRI. As most of the Ad Standards Council member companies participate in similar NetZero cheerleading, it is unlikely the Competition Bureau will be investigating all of them. We think the foregoing evidence has shown that the Ecojustice complaint should be dismissed as spurious. The evidence we presented does suggest the Competition Bureau should perhaps further examine the Tar Sands Campaign and its ongoing attacks on Alberta's energy sector and the use or abuse of Canada's charitable sector in that Green Trade War.

That said, we are concerned that RBC issued a woefully underestimated 'transition' strategy for the decarbonization of Canada. Our Professional Engineering team have done a thorough analysis showing the RBC plans are not based on a solid understanding of the workings of the power grid.

RBC estimated the capital cost of electricity decarbonization (Pathway 1) as \$67 billion; our Professional Engineers estimate it at \$4,000 billion. REC estimated the emissions reductions cost at \$6,100/tonne; our Professional Engineers estimate it to be \$100,000/tonne. RBC estimated the Benefit of CO2 reduction at \$1,100/tonne, but the Intergovernmental Panel on Climate Change (IPCC) estimates it at only \$15/tonne.⁴³

⁴³ <https://blog.friendsofscience.org/2022/06/09/royal-banks-netzero-decarbonization-estimate-is-severely-underestimated/?highlight=RBC>

RBC's errors can be forgiven as power generation is extremely complex, and all the environmental groups also get the facts wrong. This also holds true for the Bank of Canada, whom we have written to numerous times on these matters.^{44 45}

Critical Issues Face the World – Famine and the Energy Crisis

The world is facing a very serious energy crisis which cannot be resolved for many years; it is exacerbated by the conflict in Ukraine by Russia – but even if the conflict comes to some resolution in the near future, vital wheat crops will not be able to be grown for at least two seasons, if not more, and fertilizer manufacturing plants will not be operational in much of Europe, Ukraine or Russia until a pre-conflict level of natural gas access, and more affordable prices, return.

The UN already foresees famine facing 345 million people.⁴⁶ Any further shut down of energy operations, whether due to finance or conflict, will just place more millions of people at risk of starvation. Thus, the actions of Ecojustice in attacking RBC are putting millions of lives at risk.

In closing, to address the scope of decarbonization, though many climate activists, including those of the World Economic Forum, had hoped that COVID lockdowns would have made a significant difference in carbon dioxide concentration, in fact that is not the case. We explained this in an Open Letter to the Bank of Canada:

“The fact is the drop in emissions during COVID lockdowns is not enough to significantly affect the increase of Carbon Dioxide (CO2) in the atmosphere. One must compare the change of emissions to the annual change of CO2 concentrations, not to the cumulative CO2. This [graph](#) from Dr. Roy Spencer’s article shows that the annual random fluctuations of the change of CO2 concentrations are far larger than the expected change due to lockdown reduction changes of emissions. The expected reduction in the annual CO2 increase in the atmosphere is only 0.12 ppm (twelve hundredth parts per million) due to the COVID lockdown in 2020. But the annual fluctuation is 0.5 to 1.0 ppm (5 tenths to 1 part per million) Therefore, the CO2 change in the atmosphere due to the COVID lockdown is far smaller than the random fluctuations.”

We close with the text of our press release explaining this situation and offering related context.

Thank you for your attention.

Sincerely,

FRIENDS OF SCIENCE SOCIETY

⁴⁴ [Insights for Bank of Canada on NetZero, ESG-SEC, IFRS Agricultural Collapse and Famine | Friends of Science Calgary](#)

⁴⁵ <https://blog.friendsofscience.org/2021/09/20/open-letter-to-the-bank-of-canada-on-climate-change/>

⁴⁶ <https://www.prweb.com/releases/germany-teeters-on-the-brink-of-energy-disaster-global-food-crisis-looms-says-friends-of-science/prweb18791146.htm>

Lockdowns, NetZero and ESG Policies Won't Stop Climate Change – Will Destroy Lives says Friends of Science

Share Article

JP Morgan's energy analysis exposes "The Elephants in the Room" on NetZero and ESG, challenging the breezy transition assumptions of people like Mark Carney says Friends of Science Society. The Stockholm+50 "Exponential Roadmap" hype and the UNEP push for climate lockdowns every year for a decade would be ineffective as the carbon dioxide (CO2) concentration change in the atmosphere due to the COVID lockdown was far smaller than the random natural fluctuations.



People think just throwing money at climate and energy issues will result in magical results, when this is nothing more than Magical Thinking, as Robert Lyman has reported

"The fact is the drop in emissions during COVID lockdowns is not enough to significantly affect the increase of Carbon Dioxide (CO2) in the atmosphere...which is far smaller than the random natural fluctuations."

CALGARY, ALBERTA (PRWEB) JUNE 08, 2022

JP Morgan's [2022 Annual Energy Paper](#) issued in May, subtitled "The Elephants in the Room" brings some gripping and grim reality to the Utopian goals of NetZero, ESG and climate lockdown advocates, says Friends of Science Society. "The Elephants in the Room" challenges many of the breezy assumptions of climate activists and financiers like Mark Carney and GFANZ collection*, whose [recent DAVOS appearance](#) suggests that just throwing money at climate and energy issues will result in magical results, when this is nothing more than [Magical Thinking](#), as Robert Lyman has reported. (*GFANZ – Glasgow Financial Alliance for Net Zero)

In the Davos World Economic Forum of May 29, 2022, Carney claimed "We need an energy transformation on the scale of the industrial revolution at the speed of the digital transformation and therefore we need a revolution in finance."

Numerous independent energy analysts such as Vaclav Smil, Samuel Furfari, Ken Gregory, and Francis Menton have shown that such thinking is simply delusional.

The recent Stockholm+50 has been pushing the "[Exponential Roadmap](#)", issued September 2019. Subsequently, economist Marianna Mazzucato [called for action now to avoid climate lockdowns](#), while the UNEP called for [emissions cuts of 7.6% every year for the next decade](#). In the spring of 2021 World Economic Forum (WEF) cheered on COVID lockdowns as "improving cities" and was taken to task for its cruel tone-deafness by [The Spectator](#) (Australia).

The notion persists that there were dramatic reductions of carbon dioxide concentration in the atmosphere during COVID lockdowns, but this is inaccurate, as detailed in Friends of Science [Open Letter to the Bank of Canada](#) and in Dr. Roy Spencer's analysis.

An excerpt from the Open Letter reads: "The fact is the drop in emissions during COVID lockdowns is not enough to significantly affect the increase of Carbon Dioxide (CO₂) in the atmosphere. One must compare the change of emissions to the annual change of CO₂ concentrations, not to the cumulative CO₂. This [graph](#) from Dr. Roy Spencer's article shows that the annual random fluctuations of the change of CO₂ concentrations are far larger than the expected change due to lockdown reduction changes of emissions. **The expected reduction in the annual CO₂ increase in the atmosphere is only 0.12 ppm (twelve hundredth parts per million) due to the COVID lockdown in 2020. But the annual fluctuation is 0.5 to 1.0 ppm (5 tenths to 1 part per million) Therefore, the CO₂ change in the atmosphere due to the COVID lockdown is far smaller than the random fluctuations.**"

"Furthermore, carbon dioxide has never been empirically shown to be the main driver of climate change. There has been no global change in extreme weather events, including floods, droughts, storms, or hurricanes."

As shown in "[Net Zero + Green Grid = The Great Regret](#)" event videos with Dr. Ian Plimer on climate science and Joanne Nova on the "Crash Test Dummy of Renewables – Australian power grid", NetZero and ESG policies are destroying the lives of people for no useful purpose. Climate lockdowns and cuts as proposed by Mazzucato and the UNEP would be a useless effort to mitigate climate change, but a catastrophic blow to human civilization.

About

Friends of Science Society is an independent group of earth, atmospheric and solar scientists, engineers, and citizens that is celebrating its 20th year of offering climate science insights. After a thorough review of a broad spectrum of literature on climate change, Friends of Science Society has concluded that the sun is the main driver of climate change, not carbon dioxide (CO₂).

Friends of Science Society

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