

FRIENDS OF SCIENCE SOCIETY

PO Box 61172 RPO Kensington  
Calgary AB T2N 4S6  
Canada

Toll-free Telephone: 1-888-789-9597

E-mail: [contact@friendsofscience.org](mailto:contact@friendsofscience.org)

Nov. 20, 2023

Office of the Superintendent of Financial Institutions

CC: CSIS

FinTrac

Bank of Canada

Parliamentary Budget Officer

ATTN; Peter Routledge

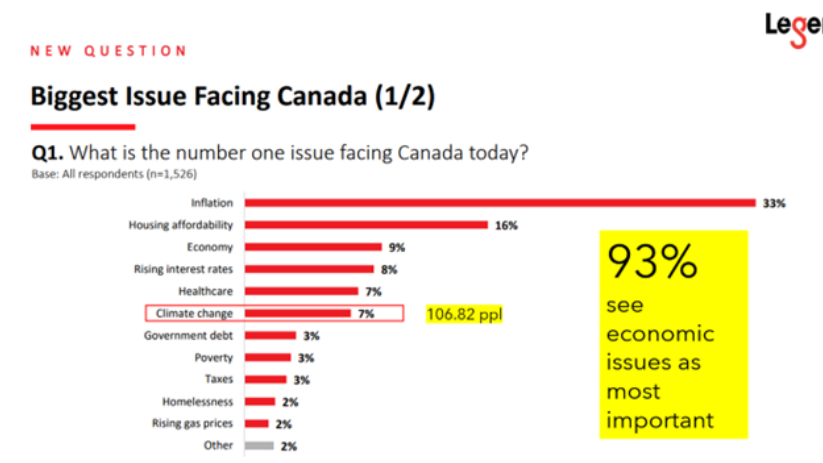
Dear Superintendent Routledge,

**RE: Your Organization's Response to our Open Letter to OSFI**

On July 31, 2023, we posted an [Open Letter to your organization](#), and we also sent it to you by email and fax. We received a reply from your organization on August 17, 2023, assuring us that your organization had consulted with thousands of parties from various sectors on climate risk. The letter included this statement:

*The Office of the Superintendent of Financial Institutions' (OSFI) purpose is to contribute to public confidence in the Canadian financial system. To fulfill that purpose, we ensure Canadian federally-regulated financial institutions and pension plans manage the risks that could impact their safety and soundness.*

With regard to this point 'to contribute to public confidence...' we ask you to review our November 19, 2023, [Open Letter to the Bank of Canada](#) concerning its recent misleading reporting on the impact of the carbon tax on inflation and the Consumer Price Index. How are Canadians to have confidence in our financial system when the Bank of Canada misleads the public on the impact of the carbon tax? As noted in our letter to the Bank of Canada, the number one issue facing Canada is inflation.



Our letter and the previous letter to the Bank of Canada (copied to you) alerted you to the fact that there are **serious conflicts of interests in the climate change financial and science community**. Likewise, we explained and provided references that the climate scenarios that the banking sector has been relying on for climate risk modelling are implausible and were never meant for policy making.

Thus, the following statement in your reply is irrelevant.

*OSFI will deliver a balanced, sensible regulatory approach that will help Canada's financial system navigate and adapt to the uncertainties and risks presented by climate change. Moreover, our supervision of climate risk management is not one-size fits all and remains proportionate to the size and complexity of each regulated entity. It enables the institutions we regulate to adapt their approach to climate risk management in a manner that supports both competitive and prudential aspirations.*

We alerted you to the serious infringement on Canadian public policy, particularly on climate, by foreign funding to various environmental nongovernmental organizations (ENGOS). In your reply, your correspondent managed to completely ignore this topic. How is that possible?

We alert you now that the consulting firm McKinsey was funded by the ClimateWorks Foundation as part of the Design to Win Strategy for some \$42.4 million; McKinsey and one of its lead consultants, Dominic Barton helped set Canada's climate strategy. Barton later became Canada's Ambassador to China.

According to CWF's IRS 990 forms, CWF expenditures for key staff positions ranged from US\$663,000 in 2008 to US\$5.1 million in 2011. Of the US\$57 million spent on consultants between 2008 and 2012, 87 percent were program related. McKinsey & Company received US\$42.4 million, most of which was for "work to develop a deep analysis of the carbon abatement opportunities of the largest economies in the world as part of ClimateWorks' global initiatives and research programs."<sup>32</sup>

We alerted you in our last letter to concerns about China's #MadeInChina2025 strategy, to become world dominant in manufacturing. This did not deserve a mention by your correspondent. China is also pegged as a dominant force in the '[rare metals war](#)' for critical minerals, of which Canada has many. And China also has a goal to establish a Polar Silk Road; [Macdonald Laurier Institute](#) has just issued a commentary by Rob Hubert on concerns about China's interference in Canada's north. Your correspondent seems unconcerned about these matters. These are directly tied to hi-tech and climate change issues.

You could play a constructive role by intervening to advise the Canadian Climate Senators of the folly of their proposed new climate finance act; particularly now that you are aware of the serious conflicts of interest in the climate finance and science world. At this time, there is a faction of the Canadian Senate pushing for [Bill S-243, Climate-Aligned Finance Act](#), which would place significant impediments on any bank financing of any fossil fuel related activity/industry in Canada. For example, from the Act:

*(a) increased capital-risk weights for financing exposed to acute transition risks, considering*

*(i) a risk weight of 1,250% for any loan, bond or derivative exposure to new fossil fuel resources or infrastructure, 25*

(ii) increasing risk weights to 150% or more for any loan, bond or derivative exposure to any fossil fuel activity,

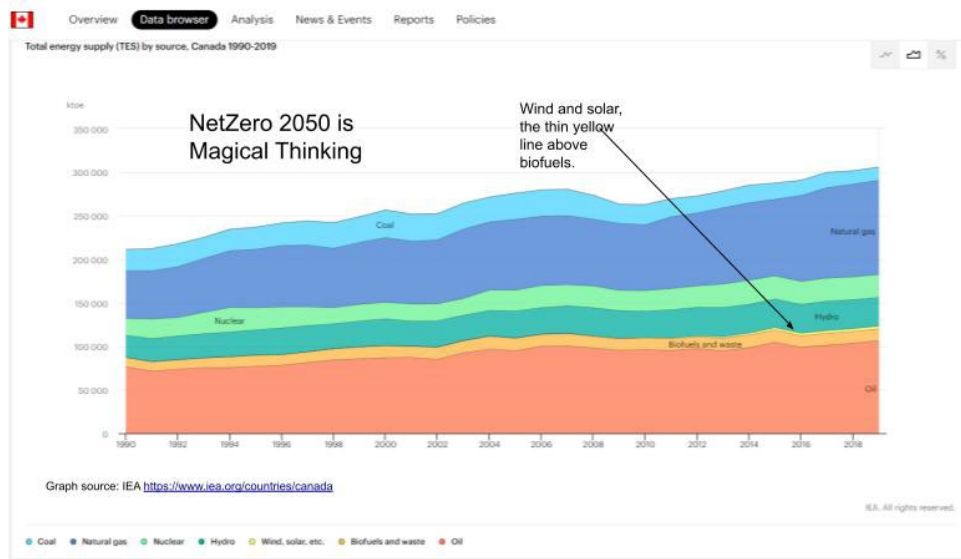
Likewise, Bill S-243 would require the appointment of a person with 'climate expertise' to key board positions of all financial institutions in Canada and would disallow any person with experience in the energy industry. All of the ENGOs mentioned in our Open Letter to you are enthusiastically behind this Senate bill.

Effectively, this draconian legislation is requiring that a climate ideologue (most of whom would be graduates of foreign-funded ENGOs) sit on the management boards of financial institutions while preventing persons with expertise in the vital energy industries which power society from participating on such boards.

By your response, we understand that you condone the fact that the climate change financial world is built upon serious Conflicts of Interest, that you have no issues with foreign-funded proxies directing Canadian energy and environmental policies and investments, and that you approve of the misuse of implausible scenarios to mislead the public and disrupt conventional finance, possibly putting the entire country at risk of energy insecurity – and that you see this as a satisfactory situation. That you have no comment on geopolitical concerns about China's stated plans to be world dominant by 2049 or the possible methods by which it might get there – for instance, crippling a competitor nation's energy supply and economic trade through proxies creating internal turmoil or promoting ineffective renewables.

### How are you acting in the interests of Canadians in any way?

In effect you are condoning and approving of circumstances and sources that, in the public square, would be deemed to extortionary, fraudulent and driven by institutional intimidation – all of which, we understand, are criminal in nature. Please observe the IEA graph below which shows Canada's total energy supply by source and appreciate just how significant Canada's energy insecurity situation will be if you continue on this path, and if you do not speak up and reject the proposed Senate legislation Bill S-243.



There is no valid reason to embark on ambitious climate action in the finance sector because the sources you are relying on are conflicted and implausible.

The greatest risk to Canada is not climate change, but energy insecurity which will be the **obvious outcome of NetZero and Clean Electricity Standard policies, which are promoted by the foreign-funded ENGOs you have been consulting with.** If the banking sector is forced into taking the actions described in the Senate's Bill S-243, why would any energy company wish to do business in Canada and how could any such company operate, free from climate ideology driven by the mandatory 'climate expert' on the board (who would share the Conflicted and Implausible climate views which the banking sector now relies upon)? How could any board make thoughtful and practical decisions without an experienced voice of reason from the energy sector – people who would have a *mandatory exclusion* from board participation?

As recently outlined by political economist Henry Geraedts, [Net Zero policies are colliding with reality](#). As early as 2018, the CEO of Iberdrola was forecasting a global renewables sector is facing an ["Enron-style endgame."](#) Thus it is difficult to understand why the Office of the Superintendent of Financial Institutions would be engaging with ["Shift Action on Pensions"](#) a Tides/Makeway offshoot that tries to shift pension fund investments into renewables, and the [ENGOs Environmental Defence and Ecojustice](#), both of which have been foreign-funded and which were and are active in the Tar Sands Campaign against Alberta's resource sector.

Is not a 'charity' attempting to move pension funds into the dying industry of renewables a form of stock market manipulation?

As Geraedts mentioned in correspondence to us: *"It is difficult for many people to grasp that the omnipresent climate crisis fiction of the past 30 years is the political root cause of by far, **the biggest misappropriation and misallocation of capital and other resources in documented history.**"*

Sir, you are playing a dangerous game with the lives of millions of Canadians who live in the second largest, second coldest country in the world and all of whom must have access to reliable, affordable energy for heat, power and transportation at all times.

As [The Economist reported](#) on May 10<sup>th</sup>, 2023, more Europeans died of high energy prices than died of COVID.

We ask you to reconsider your position. **Stop the climate risk reporting requirements and please address these concerns to the Senate and other parties.** It is our view that you cannot, in good conscience, participate and promote in activities that are founded on Conflicts of Interest, foreign-funding, and faulty premises based on implausible scenarios while claiming:

*OSFI will deliver a balanced, sensible regulatory approach that will help Canada's financial system navigate and adapt to the uncertainties and risks presented by climate change.*

Below, we remind you of the penalties an individual would face if engaging in such misleading activity based on implausible predictions in any other field than climate change.

Looking forward to you taking appropriate action on this matter – ensuring energy security for all Canadians by ensuring that bank and investment finance relies upon knowledgeable people from the

energy sector, and that policies are not being skewed by climate ideologues, who are frequently acting as proxies for ideological funders.

Sincerely,

Ron Davison, P. Eng.  
President

### Extortion

- **346 (1)** Every one commits extortion who, without reasonable justification or excuse and with intent to obtain anything, by threats, accusations, menaces or violence induces or attempts to induce any person, whether or not he is the person threatened, accused or menaced or to whom violence is shown, to do anything or cause anything to be done.

[https://laws-lois.justice.gc.ca/eng/acts/c-46/section-346.html#:~:text=346%20\(1\)%20Every%20one%20commits,shown%2C%20to%20do%20anything%20or](https://laws-lois.justice.gc.ca/eng/acts/c-46/section-346.html#:~:text=346%20(1)%20Every%20one%20commits,shown%2C%20to%20do%20anything%20or)

### Fraud

- **380 (1)** Every one who, by deceit, falsehood or other fraudulent means, whether or not it is a false pretence within the meaning of this Act, defrauds the public or any person, whether ascertained or not, of any property, money or valuable security or any service,
  - **(a)** is guilty of an indictable offence and liable to a term of imprisonment not exceeding fourteen years, where the subject-matter of the offence is a testamentary instrument or the value of the subject-matter of the offence exceeds five thousand dollars; or
  - **(b)** is guilty
    - **(i)** of an indictable offence and is liable to imprisonment for a term not exceeding two years, or
    - **(ii)** of an offence punishable on summary conviction,where the value of the subject-matter of the offence does not exceed five thousand dollars.

- **Marginal note:Minimum punishment**

**(1.1)** When a person is prosecuted on indictment and convicted of one or more offences referred to in subsection (1), the court that imposes the sentence shall impose a minimum punishment of imprisonment for a term of two years if the total value of the subject-matter of the offences exceeds one million dollars.

<https://laws-lois.justice.gc.ca/eng/acts/c-46/section-380.html>

### Intimidation

- **423 (1)** Every one is guilty of an indictable offence and liable to imprisonment for a term of not more than five years or is guilty of an offence punishable on summary conviction who, wrongfully and without lawful authority, for the purpose of compelling another person to abstain from doing anything that he or she has a lawful right to do, or to do anything that he or she has a lawful right to abstain from doing,

<https://laws-lois.justice.gc.ca/eng/acts/c-46/section-423.html>