

Clunn, Karen E LBR:EX

From: Hughes, Trevor LBR:EX
Sent: Friday, September 7, 2012 3:42 PM
To: Blakely, John H LBR:EX; Tanner, Michael A LBR:EX; Ayers, Jake LBR:EX
Subject: Bill C-377 commentary

Closed tendering privileges unions

National Post

Friday, September 07, 2012

Page FP13

By Terrance Oakcy

Copyright

Page 02

Withheld pursuant to/removed as

Copyright

Clunn, Karen E LBR:EX

From: Hughes, Trevor LBR:EX
Sent: Wednesday, May 9, 2012 5:41 PM
To: Ayers, Jake LBR:EX
Subject: Fw: Next step on union disclosure

Fyi.

----- Original Message -----

From: Hughes, Trevor LBR:EX
Sent: Wednesday, May 09, 2012 05:41 PM
To: Henderson, Kim N LCTZ:EX; Blakely, John H LBR:EX
Cc: Clunn, Karen E LBR:EX; Greer, David GCPE:EX
Subject: Re: Next step on union disclosure

Thanks for this. David gave me a heads'-up on this yesterday. I will start working on the text and connect with David and John to round it out.
T.

----- Original Message -----

From: Henderson, Kim N LCTZ:EX
Sent: Wednesday, May 09, 2012 05:34 PM
To: Hughes, Trevor LBR:EX; Blakely, John H LBR:EX
Cc: Clunn, Karen E LBR:EX
Subject: Next step on union disclosure

Hi, we've been asked to write a letter from MMM to the federal government expressing our support for the private members bill on union disclosure using our messaging that we developed on why we are in favor.

I suspect we need to check in with IGR on protocol here given that this is a private members bill, I wonder in this case if the letter would be addressed to the house leader and copied to labour minister? John, can you please connect with IGR and get this advice.

While we've been asked to get a draft ready, hitting send will be decision on its own.

K.

Clunn, Karen E LBR:EX

From: Ayers, Jake LBR:EX
Sent: Friday, March 30, 2012 10:35 AM
To: Blakely, John H LBR:EX
Cc: Hughes, Trevor LBR:EX; Tanner, Michael A LBR:EX
Subject: RE: Russ Hiebert's Bill

Yes. I will work on that.

With respect to yesterday's budget, I think the short answer is that I could not see any specific reference to the union disclosure issue. However, I would note this piece I have copied below about charities, as it does have some interesting parallels...

Enhancing Transparency and Accountability for Charities

Copyright

From: Blakely, John H LBR:EX
Sent: Thursday, March 29, 2012 5:55 PM
To: Ayers, Jake LBR:EX
Cc: Hughes, Trevor LBR:EX; Tanner, Michael A LBR:EX
Subject: Russ Hiebert's Bill

Jake,

May I ask you to do a short briefing note for the minister (or an update to an earlier note) on this private members' bill and the current status? I guess the key point now (which may be relevant for our legislation) is that this has made it through second reading, and that there is a chance at least that this will become law.

By the way, I was speculating (to myself) a bit to the effect that something about this might be said today in the federal budget – since Hiebert's bill purports to be an amendment to the Income Tax Act. Is it fair to say that my speculation was idle and has not amounted to anything?

Thanks

Clunn, Karen E LBR:EX

From: Ayers, Jake LBR:EX
Sent: Monday, March 26, 2012 4:18 PM
To: Blakely, John H LBR:EX; Tanner, Michael A LBR:EX; Hughes, Trevor LBR:EX
Subject: RE: Bill C-377

For what it's worth..the opposition take on what the progress of this bill represents:

"Usually when a bill is private member's business, other members of Parliament are less likely to attack it, because they understand it is the single hobby horse of a single MP who has a right to put forward his or her point of view. In this case, there is strong reason to believe that is a planned, orchestrated plant of this offensive, odious piece of legislation, using the member for South Surrey-White Rock-Cloverdale as a vehicle for the government to express its views of contempt and prejudice against the labour movement that has given us so much throughout the history of this country."

-----Original Message-----

From: Blakely, John H LBR:EX
Sent: Monday, March 26, 2012 3:46 PM
To: Tanner, Michael A LBR:EX; Hughes, Trevor LBR:EX; Ayers, Jake LBR:EX
Subject: FW: Bill C-377

Fyi...an email conversation that I had with one of my federal contacts.

Thanks,

-----Original Message-----

From: Blakely, John H LBR:EX
Sent: Monday, March 26, 2012 3:44 PM
To: 'anthony.giles@labour-travail.gc.ca'
Subject: RE: Bill C-377

s.16

Thanks again,

John

-----Original Message-----

From: anthony.giles@labour-travail.gc.ca [mailto:anthony.giles@labour-travail.gc.ca]
Sent: Monday, March 26, 2012 1:55 PM
To: Blakely, John H LBR:EX
Subject: RE: Bill C-377

s.16

Cheers,

Tony Giles

s.17

-----Original Message-----

From: Blakely, John H LBR:EX [mailto:John.Blakely@gov.bc.ca]

Sent: 2012-03-26 4:02 PM

To: Giles, Anthony J [NC]

Subject: FW: Bill C-377

s.16

All the best,

John Blakely

Executive Director, Labour Policy and Legislation Ministry of Labour, Citizens' Services and
Open Government Government of British Columbia

1-250-356-9987

-----Original Message-----

From: Tanner, Michael A LBR:EX

Sent: Monday, March 26, 2012 12:44 PM

To: Ayers, Jake LBR:EX

Cc: Hughes, Trevor LBR:EX; Blakely, John H LBR:EX

Subject: RE: Bill C-377

Jake - you are right. When I checked the fed website on March 14 at 6:30pm Pacific time, it wasn't showing as having passed second reading. But you are correct about status showing now.

-----Original Message-----

From: Ayers, Jake LBR:EX
Sent: Monday, March 26, 2012 11:49 AM
To: Tanner, Michael A LBR:EX
Subject: RE: Bill C-377

So it looks to me like this has been referred to the standing committee on finance. I couldn't find any notice of meeting indicating when that committee will deal with C-377 (sometimes in the committee stage there is advance warning of upcoming meetings dealing with specific issues). Is this what you meant when you said it is not done "second reading"? I think I would say it is done second reading and has been referred to the committee...?

-----Original Message-----

From: Tanner, Michael A LBR:EX
Sent: Wednesday, March 14, 2012 6:33 PM
To: Hughes, Trevor LBR:EX
Cc: Blakely, John H LBR:EX; Ayers, Jake LBR:EX
Subject: RE: Bill C-377

No. They did not finish second reading today.

-----Original Message-----

From: Hughes, Trevor LBR:EX
Sent: Wednesday, March 14, 2012 4:28 PM
To: Tanner, Michael A LBR:EX
Cc: Blakely, John H LBR:EX
Subject: Bill C-377

Looks like it was in second reading again today. Did they finish second reading today?

Clunn, Karen E LBR:EX

From: Tanner, Michael A LBR:EX
Sent: Wednesday, February 22, 2012 7:05 PM
To: Henderson, Kim N LCTZ:EX
Cc: Ayers, Jake LBR:EX; Blakely, John H LBR:EX; Hughes, Trevor LBR:EX
Subject: FW: Fed Private Members Bill

In the following email, Jake provided some comments and links related to the federal private bill...which we've confirmed was introduced and passed first reading in an amended form on Dec 5, 2011 and began second reading Feb 6, 2012 (one session; second reading not finished). In this email, I've pulled a couple of paragraph's from the second reading speeches of the bill's sponsor, MLA Russ Hiebert, regarding the issue of administrative burden for unions. We couldn't find a specific reference to a "template", he does allude to filling out "several pages on an electronic form" (highlighted). As Jake notes, the Bill talks about disclosing the info in the "prescribed form".

JUST ABOVE LINE 1110:

Mr. Georgetti also raises a concern that compliance with this bill may be costly for unions. I disagree for three reasons. First, unions already file detailed financial returns with the CRA, providing much of the information that would be required by this bill. This is a point Mr. Georgetti has acknowledged. Second, this bill would not require audited statements. Therefore, filing would not impose any additional outside expense on labour organizations. Filing could generally be prepared by their own bookkeeping or financial personnel. Finally, because of bookkeeping software and electronic filing, the cost of compliance with these sorts of requirements has dropped considerably from where it might have been in generations past.

The government's document production cost will be minimal once the electronic production system, the database and the website are in place.

JUST ABOVE LINE 115:

Further, the member complained about the additional costs he believed disclosure would cause unions to incur. As I mentioned, using tax software and electronic filing, the costs to labour organizations would be quite minimal. Filing is not a new activity for unions. Unions already file tax returns each year. Much of the information proposed to be collected under this bill is already required. The difference, of course, is that this information would be made public. However, that difference alone would create no cost for labour organizations.

The member has raised the concern that the filing requirement could be onerous for small locals of perhaps a few dozen members. That is again not so. Small locals are, by definition, small spenders and may not have spent anything in several of the categories mentioned in the bill. What can be easier than putting a zero on several pages of an electronic form? I believe that the experience of charities over the last 35 years is instructive. The process has not bogged down charities, which, unlike unions, are often run by volunteers alone. The process has not cost them significant sums of money, and the same would be true for labour organizations.

The debate on this bill is just getting under way. Some have already taken a position on it. I would encourage those who have already stated opposition to the bill to consider the following facts. The bill would not tell union leaders how to spend their money or restrict them in any way. The bill would not place a substantial burden or expense on unions. Unions are already engaged in responsible accounting. Many unions are already publicly reporting this financial information to members and others. Finally, all unions are already filing much of this information with the Canada Revenue Agency through their tax returns.

From: Ayers, Jake LBR:EX
Sent: Wednesday, February 22, 2012 5:41 PM
To: Tanner, Michael A LBR:EX

Cc: Hughes, Trevor LBR:EX
Subject: RE: Fed Private Members Bill

So the key difference between this Bill C-377 and the original C-317 is that the latest bill (C-377) does not amend the part of the Income Tax Act which allows union dues to be tax deductible. Bill C317 (the original one) would have amended that part of the income tax so that ONLY dues paid to unions in compliance with the NEW disclosure requirements would be deductible. The Speaker ruled that that aspect of the Bill effectively amounted to a tax increase and therefore a Private Member is restricted from tabling such a bill. The new Bill (C-377) just moves straight into creating new requirements for disclosure under the Income Tax Act (the same requirements that were in the old bill). Presumably though, union dues to non compliant unions would still be deductible under the C-377 amendments. One other difference between the two bills is that the new bill (C-377) includes a penalty provision – contraventions are liable on summary conviction to a fine of \$1000 per day of non compliance.

Here is the Parliament website info on the Bill

<http://www.parl.gc.ca/LegisInfo/BillDetails.aspx?Language=E&Mode=1&billId=5295287>

Second reading debates thus far:

<http://www.parl.gc.ca/HousePublications/Publication.aspx?Pub=Hansard&Doc=74&Parl=41&Ses=1&Language=E&Mode=1>

As I see it, this hasn't gone to committee yet (I assume at this point that unless the government picks it up, it will die on the order paper). It also looks to me like this was introduced in December.

I read through pretty quick but did a search and did not anything about a template. I would note though that the Bill talks about disclosing the info in the "prescribed form".

There is some talk there about what unions already have to provide to the CRA which is new to me...

Link to Russ Hiebert's website on the issue (I already sent you this link)

<http://www.c377.ca/en/>

PS. I think you should send this to John.

From: Tanner, Michael A LBR:EX
Sent: Wednesday, February 22, 2012 5:06 PM
To: Ayers, Jake LBR:EX
Subject: FW: Fed Private Members Bill

Can you see if you can find the second reading debate....

From: Hughes, Trevor LBR:EX
Sent: Wednesday, February 22, 2012 5:04 PM
To: Henderson, Kim N LCTZ:EX; Tanner, Michael A LBR:EX
Subject: RE: Fed Private Members Bill

As noted by Joel, it is now Bill C-377 and was re-introduced in November and second reading started Feb 6.

<http://www.parl.gc.ca/LEGISInfo/BillDetails.aspx?Language=E&Mode=1&billId=5295287>

From: Henderson, Kim N LCTZ:EX
Sent: Wednesday, February 22, 2012 4:54 PM

To: Tanner, Michael A LBR:EX
Cc: Hughes, Trevor LBR:EX
Subject: Fed Private Members Bill

Hi Michael. The Minister mentioned today that she understood that the federal private members bill on union disclosure was at second reading? She said that it was mentioned in second reading that templates would be provided to unions to assist with the administrative burden of complying.

I am surprised to hear this is at 2nd reading, we understood it was dismissed. Can you check this out?

k.

Clunn, Karen E LBR:EX

From: Ayers, Jake LBR:EX
Sent: Wednesday, February 22, 2012 5:09 PM
To: Tanner, Michael A LBR:EX
Subject: RE: Fed Private Members Bill

In the mean time

<http://www.c377.ca/en/>

From: Tanner, Michael A LBR:EX
Sent: Wednesday, February 22, 2012 5:06 PM
To: Ayers, Jake LBR:EX
Subject: FW: Fed Private Members Bill

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From: Henderson, Kim N LCTZ:EX
Sent: Wednesday, February 22, 2012 4:54 PM
To: Tanner, Michael A LBR:EX
Cc: Hughes, Trevor LBR:EX
Subject: Fed Private Members Bill

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I am surprised to hear this is at 2nd reading, we understood it was dismissed. Can you check this out?

k.

Clunn, Karen E LBR:EX

From: Ayers, Jake LBR:EX
Sent: Wednesday, February 22, 2012 5:03 PM
To: Tanner, Michael A LBR:EX
Subject: RE: Fed Private Members Bill

This is interesting. It looks to me like MP Russ Hebert introduced a second bill on the same subject. Bill C-377. While this bill has been introduced and read for a first time, it has not gone to second reading. Here is the Bill. Haven't looked carefully to see how it is different in order to comply with the speakers ruling...

<http://www.parl.gc.ca/HousePublications/Publication.aspx?Language=E&Mode=1&Docid=5303183&File=24>

From: Tanner, Michael A LBR:EX
Sent: Wednesday, February 22, 2012 4:57 PM
To: Ayers, Jake LBR:EX
Subject: FW: Fed Private Members Bill

From: Hughes, Trevor LBR:EX
Sent: Wednesday, February 22, 2012 4:56 PM
To: Henderson, Kim N LCTZ:EX; Tanner, Michael A LBR:EX
Subject: RE: Fed Private Members Bill

<http://www.parl.gc.ca/LEGISInfo/BillDetails.aspx?Language=E&Mode=1&billId=5146724>

Found the link which confirms the bill was discharged and dropped November 4. My only conclusion is that the Minister must have heard about another (related?) bill at second reading...?

From: Henderson, Kim N LCTZ:EX
Sent: Wednesday, February 22, 2012 4:54 PM
To: Tanner, Michael A LBR:EX
Cc: Hughes, Trevor LBR:EX
Subject: Fed Private Members Bill

Hi Michael. The Minister mentioned today that she understood that the federal private members bill on union disclosure was at second reading? She said that it was mentioned in second reading that templates would be provided to unions to assist with the administrative burden of complying.

I am surprised to hear this is at 2nd reading, we understood it was dismissed. Can you check this out?

k.

**MINISTRY OF LABOUR, CITIZENS' SERVICES AND OPEN GOVERNMENT
BRIEFING NOTE**

Prepared by: Labour

Ref: 96171

Date: March 30, 2012

I PREPARED FOR: Honourable Dr. Margaret MacDiarmid, Minister

FOR INFORMATION

TOPIC: Union Financial Disclosure

II ISSUE:

Federal private member's bill requiring public disclosure of union financial information.

III BACKGROUND:

On October 3, 2011, Russ Hiebert, Member of Parliament for South Surrey White Rock/Cloverdale, introduced a private member's bill (C-317) in the House of Commons. Bill C-317 would amend the *Canada Income Tax Act* and require all "labour organizations" and "labour trusts"¹ to file a standardized set of financial statements with the Canada Revenue Agency. Those statements would then be posted on a federal government website for public viewing. Because Bill C-317 proposed that the tax exemption status of union dues be negated where the union was not in compliance with the new disclosure requirements, the Speaker of the House ruled that Bill C-317 was effectively a spending bill and could therefore only be introduced by government (i.e., not as a private members bill). Accordingly, Bill C-317 died on the order paper. However, MP Russ Hiebert reintroduced an amended version of the bill, as Bill C-377, which focused only on the disclosure aspects (i.e., it does not contemplate the elimination of tax exemption status of union dues).

Under the *Canada Income Tax Act*, registered charities are required to disclose certain financial information, which can then be made available to the public. Bill C-377 attempts to treat labour organizations more like charities in that detailed financial disclosure is required in exchange for the tax exemptions that are provided under the *Income Tax Act* (like charitable donations, union dues are tax deductible). Mr. Hiebert states that:

"With public disclosure, Canadians will be able to gauge the effectiveness, financial integrity and health of their unions...The principle is, just like charities, labour organizations receive a public benefit and the public should be informed how that public benefit is being used."

Bill C-377 requires that the specific financial details be disclosed in accordance with rules prescribed by regulation. However, the bill itself also lays out numerous specific requirements for disclosure, which would be in addition to anything prescribed in a regulation. For example, the bill requires disclosure of information revealing (among other things):

- Regular financial statements (e.g., statements of assets, liabilities etc.)
- Salaries, stipends, benefits, travel expenses, of officers, directors, and trustees
- Detailed information accounting for the costs and time spent on political and lobbying activities.

¹ "Labour Organizations" and "Labour Trusts" are defined quite broadly in the bill. While the focus of the bill appears to be on unions and union trusts (e.g., union held pension plans), the current wording of the bill may effectively apply the disclosure requirements to union organizations such the BC Federation of Labour, as well as employer organizations who represent their members in labour relations matters.

- Statement of disbursements on "labour relations activities" (i.e., activities associated with the negotiating and enforcement of collective agreements).

IV DISCUSSION:

Although private members' bills very rarely become law, there is some speculation (by the opposition and in the media) in this case that the government will support the bill (or some amended version of the bill). On March 14, 2012, Bill C-377 passed second reading in the House of Commons and has now been referred to the Standing Committee on Finance.

Initial reaction to the bill from the union community has been negative. For example, Ken Georgetti, President of the Canadian Labour Congress, has characterized the bill as an attack on unions and that it is "an attempt to create an issue that doesn't exist." A recent article by Tom Sigurdson (Executive Director of the British Columbia and Yukon Territory Building and Construction Trades Council) also characterized the bill as an attack on trade unions and argued that the bill was addressing a non-existent "problem" given the democratic nature of Canadian unions and the existing access of union members to financial information.

The Bill has received public support from some groups such as the Canadian Labourwatch Association, Merit Canada (representing non-union construction companies), and the Fraser Institute.

V CONCLUSION:

The Ministry of Labour, Citizens' Services and Open Government will continue to monitor the development of Bill C-377 as well the reaction to it from the public and from the labour community.

PREPARED BY:

Jake Ayers
Senior Policy Advisor
250 953-3344

REVIEWED BY:

John Blakely
Executive Director
250 356-9987

Kim Henderson
Deputy Minister

s.17

Clunn, Karen E LBR:EX

From: Underwood, Brad FIN:EX
Sent: Tuesday, May 22, 2012 3:41 PM
To: Hughes, Trevor LBR:EX
Subject: Bill C-377 Letter to Minister Flaherty
Attachments: Letter from MKF to Minister Flaherty re Bill C-377 - May 16 2012.docx

FYI Trev.

This is the letter that I sent up to my ADM today, same one we looked at last week. I was directed to get it moving up the chain today, so sent it to my ADMO first,

s.13

s.13

Sorry I couldn't wait on it any longer.

B

Honourable James Flaherty
Minister of Finance
Finance Canada
140 O'Connor Street
Ottawa, Ontario
K1A 0G5

Dear Honourable Minister:

I am writing to you to express the views of the Government of British Columbia with respect to Bill C-377, a private member's bill titled *An Act to Amend the Income Tax Act (Requirements for Labour Organizations)*. I understand that the Bill has completed second reading and was referred to the Standing Committee on Finance on March 14, 2012.

As we understand it, the Bill is designed to require the public disclosure of the finances of trade unions. In second reading of the Bill, Mr. Russ Hiebert noted that the Bill "is in line with the greater transparency that we are demanding from government departments, public agencies and native reserves." As unions are tax exempt and union dues are 100 percent tax deductible, federal and provincial governments are forgoing significant amounts of tax revenue each year. B.C. agrees that the public, as well as the union membership, deserve to know how labour unions spend their money. In support of the Bill, Mr. Hiebert also noted the results of a 2011 Nanos poll that 83 percent of Canadians and 86 percent of union members indicated they want unions to provide public financial disclosure.

In the past year, the Government of British Columbia has made a clear commitment to encourage more openness and transparency. Based on what we have seen as a result of this increased level of disclosure, it is clear that these amendments will encourage discussion and improve accountability. B.C.'s open government policies were written into law through amendments to the *Freedom of Information and Privacy Protection Act* in the fall of 2011. This mandate has resulted in government sharing more information with its citizens, and has provided more opportunities for them to participate in decisions that make a difference in their lives.

We support the principles behind Mr. Hiebert's Bill, since they are consistent with those underlying our government's views on transparency. We believe that Canada should be adopting financial disclosure requirements for unions, which is a common practice in other countries such as the United States and Australia. In B.C., while unions are required to provide financial disclosure to their members, very few make such

information publicly available. Because unions have an important voice, influence public policy, and have tax exempt status, they should be more transparent and accountable for their spending decisions.

However, as currently drafted, there appears to be an inadvertent flaw in the bill that needs to be addressed. As you may be aware, B.C. Ministry of Finance officials have brought to the attention of your staff a concern that Bill C-377 may, without intending to do so, include jointly trustee pension plans under the definition of "labour trust". Such a designation would put B.C.'s joint-trust model at a disadvantage relative to other public pension plan models. We believe that the approach developed in B.C. is a model for the future. It makes employers and employees equally responsible for maintaining the financial soundness of public pension plans. This model has been instrumental in ensuring that B.C.'s public pension plans are well-managed and that we do not amass the huge unfunded liabilities that we see in many other jurisdictions. As a consequence, B.C.'s model has garnered much interest internationally and from provinces looking for ways to reform their pension plans.

In conclusion, the Government of British Columbia supports the principles of transparent financial disclosure embodied in Bill C-377, however we feel that it would be strengthened by an amendment that address an inadvertent flaw that would negatively impact well-governed pension plans such as ours.

I would be pleased to discuss with you the Province's views on Bill C-377.

Yours truly,

Kevin Falcon
Minister

pc: Honourable Christy Clark, Premier

Margaret MacDiarmid, Minister of Labour, Citizens' Services and Open Government

Russ Hiebert, Member of Parliament, South Surrey-White Rock-Cloverdale

Kim Henderson, Deputy Minister, Ministry of Labour, Citizens' Services and Open Government

Peter Milburn, Deputy Minister, Ministry of Finance

Clunn, Karen E LBR:EX

From: Molnar, Rory FIN:EX
Sent: Tuesday, May 15, 2012 9:46 AM
To: Hughes, Trevor LBR:EX; Blakely, John H LBR:EX
Cc: Underwood, Brad FIN:EX; Greer, David LCTZ:EX; Craven, Paul IGRS:EX
Subject: RE: Letter from MMM to Minister Flaherty re Bill C-377 - May 10 2012 (2) - RMBU.docx

Thx Trevor.

From: Hughes, Trevor LBR:EX
Sent: Tuesday, May 15, 2012 9:42 AM
To: Molnar, Rory FIN:EX; Blakely, John H LBR:EX
Cc: Underwood, Brad FIN:EX; Greer, David GCPE:EX; Craven, Paul IGRS:EX
Subject: RE: Letter from MMM to Minister Flaherty re Bill C-377 - May 10 2012 (2) - RMBU.docx

Attached as requested. << File: Letter from MMM to Minister Flaherty re Bill C-377 - May 11 2012.docx >>

From: Molnar, Rory FIN:EX
Sent: Tue, May 15, 2012 9:00 AM
To: Blakely, John H LBR:EX
Cc: Underwood, Brad FIN:EX; Hughes, Trevor LBR:EX; Greer, David GCPE:EX; Craven, Paul IGRS:EX
Subject: RE: Letter from MMM to Minister Flaherty re Bill C-377 - May 10 2012 (2) - RMBU.docx

Hi John

Our DM wants a briefing on this tomorrow morning. Could I get a copy of the latest draft so that he has the background? We need something by about 10 this morning so he can have a chance to review it beforehand. Thanks.

Rory Molnar
Executive Director, Intergovernmental Fiscal Relations
BC Finance - (250) 387-7511

From: Craven, Paul IGRS:EX
Sent: Monday, May 14, 2012 4:32 PM
To: Blakely, John H LBR:EX
Cc: Molnar, Rory FIN:EX; Underwood, Brad FIN:EX; Hughes, Trevor LBR:EX; Greer, David GCPE:EX
Subject: RE: Letter from MMM to Minister Flaherty re Bill C-377 - May 10 2012 (2) - RMBU.docx

John,

s.13, s.16

From: Blakely, John H LBR:EX
Sent: Friday, May 11, 2012 4:14 PM

To: Craven, Paul IGRS:EX

Cc: Molnar, Rory FIN:EX; Underwood, Brad FIN:EX; Hughes, Trevor LBR:EX; Greer, David GCPE:EX

Subject: FW: Letter from MMM to Minister Flaherty re Bill C-377 - May 10 2012 (2) - RMBU.docx

Paul, Rory and Brad,

Thanks for this. We will accept the changes to this letter, and send it up to Kim Henderson for her review. Please note that in light of your changes, I made one further change (tracked in the attached document) to remove some duplication. We'll keep you posted on next steps.

s.13, s.16

Thanks,

From: Craven, Paul IGRS:EX

Sent: Friday, May 11, 2012 3:02 PM

To: Blakely, John H LBR:EX

Cc: Molnar, Rory FIN:EX; Underwood, Brad FIN:EX; Hughes, Trevor LBR:EX; Greer, David GCPE:EX; Craven, Paul IGRS:EX

Subject: Letter from MMM to Minister Flaherty re Bill C-377 - May 10 2012 (2) - RMBU.docx

<< File: Letter from MMM to Minister Flaherty re Bill C-377 - May 10 2012 (2) - RMBU.docx >>

Hi John,

Thanks for your draft yesterday. Here is a revised letter that incorporates comments from Finance which will hopefully work. Finance brought to my attention that the joint trust model has figured prominently in debates recently and therefore important to address. See below.

s.13, s.16

s.13, s.16

Please let me know what you think.

Paul

During Estimates debate on ICBC, Minister Falcon said...

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