

November 15, 2015
Selina Williams, Corporate Officer Town of Gibsons
474 South Fletcher Road
Box 340
Gibsons BC V0N 1V0

RE: Execution of FOI 2015-07

Dear Ms. Williams:

We are troubled by the manner in which FOI 2015-07 was executed and we have identified a number of issues, which we hope you will remedy as soon as possible.

It appears to us that a number of methods have been used to obstruct access to information by making FOI 2015-07 released material difficult to navigate, including meaningless information, using sweeping and inconsistent justifications to redact documents and omitting key documents from the released materials.

Of the 1666 pages released, at least 289 documents are useless, for these reasons:

- **Unrelated documents.** 64 pages are totally off topic. Including a 12-page brochure, an 18-page article about rent review in Alberta, a brochure about what arbitration is and how it works, a letter about shipping bicycles to Africa.
- **Unidentifiable documents.** Numerous pages are redacted, including page numbers.
- **Duplicates:** Many documents are doubles, triples and in some cases even multiples of 5.
- **Random pages.** Maps unconnected to documents, empty pages, pages with random photos, many of them in duplicate.
- **32 Pages without information.** Empty, or only a name. E.g. Page1296.
- **Documents not in chronological order.** Not only does the lack of order make it difficult to read the FOI, it also makes maps and illustrations meaningless because it is unclear where or to what they belong.
- **Page numbers have been tampered with.** This has rendered the Record of Information Severed or Documents Withheld useless.

We feel you have used sweeping, inconsistent and lacking justifications to redact information that we have a right to access under the Act.

- **“Legal Advice”**

- Used as a rationale to redact indiscriminately with no explanation or summary of any redacted legal advice given.
- Used as rationale to redact for some documents, yet other legal advice *is* released. E.g. page 1125 the town’s lawyer writes to the CAO Emanuel Machado on December 9, 2013 and the information is not redacted, nor should it be. Yet on page 1120, that very same document is found as a double and the content is redacted.

- **No justification given for many redactions.** E.g. pages 1295-1297, and 1327-1330.

There are numerous missing documents in the released material. Examples include:

1. Staff meeting notes.
2. Documents received by the town from the provincial government.
3. Numerous email attachment documents referenced throughout the FOI release.

Exorbitant fees have been charged and fee waiver requests ignored.

GABC has only sought information through FOI about matters, which are of keen public interest and which we have been unable to access through other means. We are committed to and consistently demonstrate that we will and do share information retrieved through FOI with the public through numerous media. Yet we were charged \$1,400.00 for this FOI release. Formal responses from the town ignore our fee waiver requests and the fact that GABC widely distributes FOI released information that is of great interest to the local community via our website www.gibsonsalliance.ca, Facebook page and local mailing list gibsonsalliance@gmail.com.

We request the you please provide us with the following:

1. All missing documents, including staff meeting notes, communications with the Provincial Government, email attachments and other documents not released;
2. Proper numbering for documents between page numbers 1367 and 1480, so that the Record of Information Severed or Documents Withheld can be used;
3. A summary of the legal advice for all 37 entries listed as “Legal Advice” on the Record of Information Severed or Documents Withheld;
4. Justifications for redactions on pgs 1273, 1295-1297, and 1327-1330; and
5. Pursuant to the Freedom of Information and Privacy Act, Part 6, 75 (5)(b) we request a refund of the fees we have paid to the town of Gibsons for FOI 2015-07.

Thank you for your time and consideration.

Suzanne Senger, for Gibsons Alliance of Business and Community Society