

April 11, 2016

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BC Environmental Assessment Office

**RE: Brief on EAO Public Comment Site Taken over by Pro-Ajax Manipulation**

Please find attached a Brief written to outline a problem with the public input process to the BC EAO website.

We wanted to bring this to your awareness.

We hope you will investigate as suggested and handle the information obtained from the site with scrutiny.

Furthermore, it just came to our attention that after April 6<sup>th</sup>, the Sierra Club drafted a form letter for some anti-Ajax groups to be circulated. We have not seen any significant impact on the process from that letter, but will investigate in the near future. To our knowledge, the Sierra Club form is not one that changed upon a page refresh and did not try to simulate being individually written.

**Respectfully,**

**Cynthia Ross Friedman, PhD**  
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Vice-Chair, Thompson Rivers University Faculty Association Human Rights Committee  
<mailto:Cross@tru.ca>

**and**

**Peter Tsigaris, PhD**  
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## A Brief on EAO Public Comment Site Taken over by Pro-Ajax Manipulation

This brief is written to inform the BC EAO and the CEAA of a serious issue with the EAO public comment site. Public comments started on January 26<sup>th</sup> and will end on April 11<sup>th</sup>. This brief addresses data from the start date of January 26<sup>th</sup> until April 5<sup>th</sup>.

During this interval there were 1372 comments. Of these comments 49 percent were local, 24 percent were from outside the local area and 27 percent did not specify location. The results if taken in total indicate that there are more comments that support the mine (58%) relative to those comments that do not support or are concerned with the mine (42%). 92% of people from outside the local area were in favour of Kamloops having the mine next to its borders. 86 percent of these outside Kamloops pro-Ajax comments used form letters or pre-written letters.

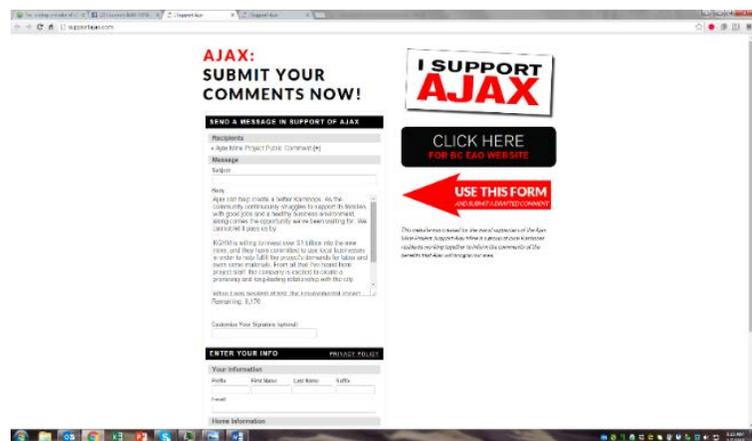
The percentage of duplicated form letters from the pro-Ajax people is 65.1 percent, while the duplicated comments from those opposed to the mine is only 2.3 percent. If duplicated comments are removed from the count, the overwhelming majority, 67 percent, is against or concerned with the open pit mine. If one considers only non-duplicated letters from either local or unknown locations, the percentage concerned with the mine increases to 70 percent of the comments.

The impact of duplication using form letters is significant. It would appear that the site has been manipulated with numerous pre-written relatively lengthy messages (form letters) from pro-Ajax groups. This has the potential of distorting the views and opinion of the community on this controversial project. Kamloops citizens screening the site might conclude comments are overwhelmingly in favor of the project when in fact this is far from the truth. This could bias the motivation to participate and give further input, and puts the citizens who are manually entering their input at a disadvantage relative to the group that can enter with automation.

### How the Manipulation Works

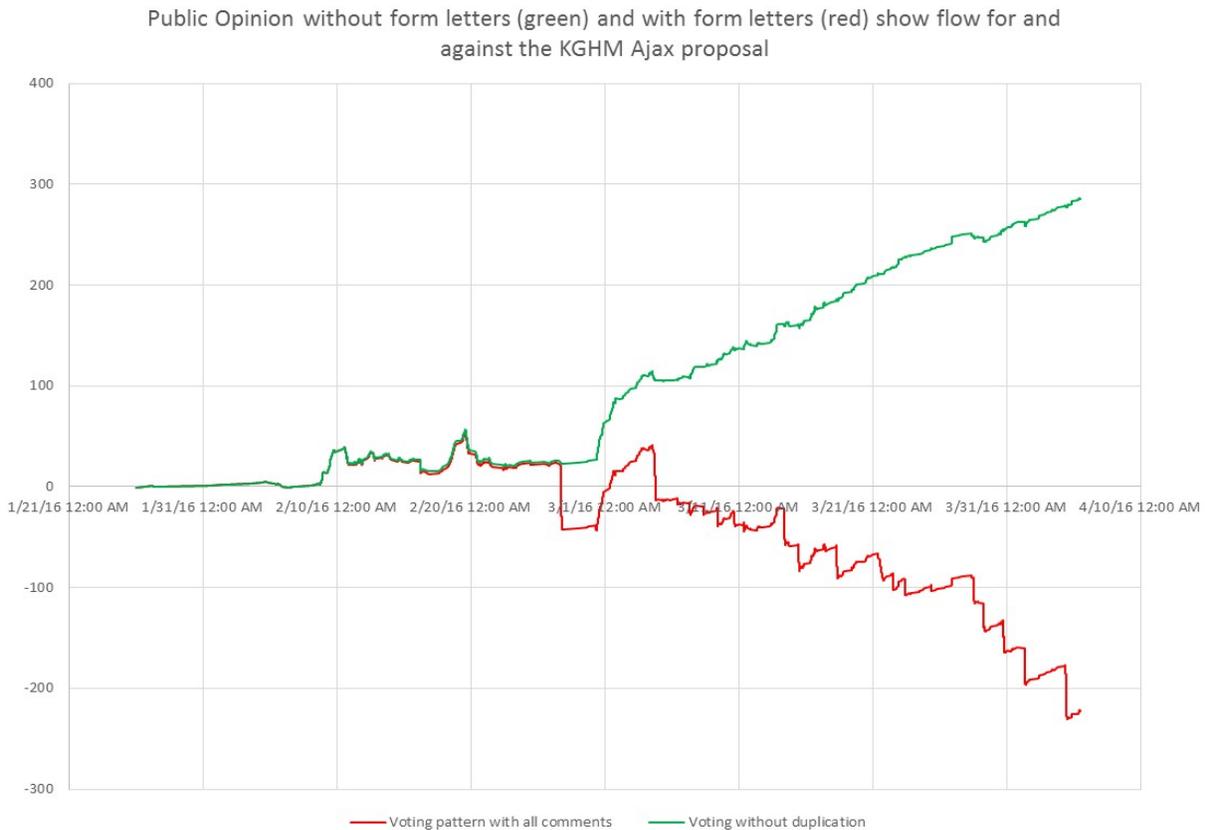
It is important for BC EAO and CEAA to determine who is behind this manipulation, which has the potential to influence the outcome of public opinion. First, a support website, <http://supportajax.com> has been designed in order to speed up the process of submission. It is extremely easy to submit. One enters some personal information and then presses the submit button and the letter goes directly to the BC EAO website. The message formats (form letters) change very often. Every time the webpage is reloaded a different message appears. A screenshot of the website is shown in Figure 1. On March 3<sup>rd</sup> 2016 the site appeared on the support Ajax Facebook page. But the start of these letters was even before March 3<sup>rd</sup> 2016. Two form letters appeared in massive numbers on the public comment website on February 26<sup>th</sup> 2016. Sixty-six comments within a few hours were submitted and not one opposed the project. Most of these messages on this particular day were from outside

Figure 1: Snapshot from <http://supportajax.com>



Kamloops (76 percent). In fact, this event changed the majority to being in favor. In other words, outsiders were changing and influencing the public opinion using the two form letters. The other community groups took notice and encouraged their members to write in. These manual and non-duplicated entries did offset the large volume of the automated entries of the February 26<sup>th</sup> event. Since then, form letters have been arriving continuously. From early March until April 5<sup>th</sup> the pro-Ajax comments outnumbered those against or concerned with the project. Form letters do not arrive only via the supporters' Facebook website, but also by other unknown means.

Figure 2 below shows the pattern of public opinion through time. The red is all comments and the green is without the form letters. Above zero means opinion is stronger against the project, while below zero means opinion is stronger in favour of the project. An increase means a growing anti-Ajax vote, while a decrease means a growing pro-Ajax vote. The vertical axis counts the net number of comments at a particular point in time in the process. If one looks at the website as it exists now, the information given is that shown by the red line. If the form letters are removed, then the perception of the viewer would be as shown by the green line. Note that there is a specific date when the form letters began to have a major impact on the makeup of the comments.



## **Form Messages from Votervoice.net in the USA**

The support website is designed by votervoice.net. Votervoice.net is a company from the United States of America that provides “Powerful technology and personalized service for public affairs professionals”. This company is in the business to build and launch advocacy campaigns quickly. It tracks campaign progress with real-time activity reports. It mobilizes supporters with targeted messages. It also provides value newsletters, surveys, and scorecards. For more information see <https://info.votervoice.net/>). There is a significant cost associated with this service and it would be of interest to determine who paid for this service.

## **A Serious Examination of the Entire Public Comments Record Must Be Undertaken**

It seems that the EAO public comment site has become a popularity contest. These duplicated comments are written in such a way to inflate the importance and value of Labor Force, Employment and Training, Business, Project benefits and Economic growth. In other words, visitors seeing the comments on the BC EAO website get an inflated view of these topic areas, which could influence the site user.

We think this brings up ethical issues. First, these messages are not authentic personal contributions. Second, the exact same message is submitted numerous times from different people in different locations. Third, people not living in the Kamloops area will not face the negative effects of the project. Fourth, many of the messages are submitted concurrently in very small time intervals. This is worrisome and creates serious mistrust in the public system. Finally, it creates an unfair advantage for those using automated entries.

We believe that this manipulation has led to distrust of the BC EAO public comments process. Who is behind these actions remains unknown but trust has been shaken. The BC EAO public comments do not represent the true picture of the views of the community of Kamloops. Comments have been biased in favour of business, economic growth, project benefits, labor force, employment and training, when in fact the community is very concerned with human health, air quality, property values and the regulatory process. The BC EAO should be extremely careful when screening these messages and should investigate who is behind the funding of the activities of votervoice.net which has used its “powerful technologies” to influence public opinion on a controversial project.

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The data were analyzed by Dr. Peter Tsigaris, Professor, Thompson Rivers University, Kamloops, B.C. Data are available upon request via email <mailto:ptsigaris@tru.ca>.