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OSLER

Toronto

August 12, 2014

Catherine Gleason-Mercier
Direct Dial: 416.862.4247
cgleasonmercier@osler.com

Montréal

Calgary

Ottawa

Sent by Registered Mail

New York

Department of Canadian Heritage
155 Eddy Street
Gatineau, Quebec KIA 0M5

Dear Madam/Sir:

Access to Information Request – FIFA Women's World Cup 2015

This letter constitutes a request for information under the *Access to Information Act* (R.S.C., 1985, c. A-1).

On Aug. 6, 2014, Department of Canadian Heritage Spokesman Pierre Manoni was quoted in *The Toronto Star* as stating, via email, "Decisions regarding the playing surface at the FIFA Women's World Cup 2015 are the responsibility of FIFA."¹

Pursuant to this statement, I hereby request a copy of all records, as defined below, or communications possessed by the Department of Canadian Heritage showing that FIFA dictated, controlled, or was otherwise responsible for the playing surface to be used at the FIFA Women's World Cup Canada 2015.

By "records," I mean copies of any and all drafts or final versions of correspondence, including, but not limited to: electronic mail, instant messages, and/or letters; and any and all drafts or final versions of: memoranda, meeting agendas, and any other documents that were created, prepared, sent, edited, or received by Sport Canada and its officers and employees.

Pursuant to the *Access to Information Act*, I anticipate receiving all responsive records within 30 days. If you deny this request in part, please produce the documents to which I am entitled to access. If you choose to deny this request in whole or in part, I anticipate receiving a written notice within 30 days explaining why you believe I am not entitled to any or all of the records described above.

¹ Zoe McKnight, *Replacing artificial turf for Women's World Cup not easy, experts warn*, *The Toronto Star*, Aug. 6, 2014, available at www.thestar.com/sports/soccer/2014/08/06/replacing_artificial_turf_for_womens_world_cup_not_safe_expert_warns.html.

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Canadian Heritage – Sport Canada
c/o The Honorable Bal Gosal, Minister of Sport
Sport Canada
155 Eddy Street, 16th Floor
Gatineau, Quebec KIA 0M5

Dear Sir:

Access to Information Request – FIFA Women's World Cup 2015

This letter constitutes a request for information under the *Access to Information Act* (R.S.C., 1985, c. A-1).

I hereby request a copy of all records, as defined below, possessed by Sport Canada regarding the FIFA Women's World Cup Canada 2015, the 2026 FIFA World Cup, and providers of artificial turf surfaces.

1. With respect to the FIFA Women's World Cup Canada 2015, I request copies of:
 - (i) any records referencing stadiums where the FIFA Women's World Cup Canada 2015 qualifying and final rounds are to be played;
 - (ii) any records referencing "turf," "artificial turf," "grass overlays," "temporary grass," "permanent grass," "natural grass,"; and
 - (iii) any records referencing the FIFA "2-star" rating for artificial turf.

I likewise request a record of all communications between Sport Canada and any other entity or individual regarding the FIFA Women's World Cup Canada 2015, including but not limited to any officer or employee of B.C. Pavilion Corporation, FIFA, the Canadian Soccer Association, and the National Organizing Committee for the FIFA Women's World Cup Canada 2015.

2. With respect to the 2026 FIFA World Cup, I request a copy of records or communications relating to a Canadian bid, or plans to make such a bid, to host the 2026 FIFA World Cup.

3. With respect to providers of artificial turf surfaces, I hereby request copies of records and communications referencing any company, corporation, or business that supplies, installs, or maintains artificial turf playing surfaces at any stadium site hosting a FIFA Women's World Cup Canada 2015 match, including but not limited to any records or communications regarding payments from such artificial turf companies to the Canadian Soccer Association or FIFA.

By "records," I mean copies of any and all drafts or final versions of correspondence, including, but not limited to: electronic mail, instant messages, and/or letters; and any and all drafts or final versions of: memoranda, meeting agendas, and any other documents that were created, prepared, sent, edited, or received by Sport Canada and its officers and employees.

Pursuant to the *Access to Information Act*, I anticipate receiving all responsive records within 30 days. If you deny this request in part, please produce the documents to which I am entitled to access. If you choose to deny this request in whole or in part, I anticipate receiving a written notice within 30 days explaining why you believe I am not entitled to any or all of the records described above.

If you anticipate any copying or other costs associated with this request, please provide me with an estimate prior to incurring those costs.

Please send the request records and any correspondence associated with this request to the undersigned.

Finally, please do not hesitate to contact me regarding any aspect of this request. Thank you for your consideration.

Yours very truly,



Catherine Gleason-Mercier
CGM:am

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Sent by Registered Mail

B.C. Pavilion Corporation
c/o Ken Cretney, President & CEO
Suite 200 – 999 Canada Place
Vancouver, BC
V6C 3C1

Dear Sir:

Access to Information Request – FIFA Women's World Cup 2015

This letter constitutes a request for information under the *Access to Information Act* (R.S.C., 1985, c. A-1).

I hereby request a copy of all records, as defined below, possessed by B.C. Pavilion Corporation (“PavCO”) regarding the FIFA Women’s World Cup Canada 2015 and providers of artificial turf surfaces.

1. With respect to the FIFA Women’s World Cup Canada 2015, I hereby request a copy of any record possessed by PavCO regarding the field surface for the FIFA Women’s World Cup Canada 2015, including but not limited to records of any documents referencing “turf,” “artificial turf,” “grass overlays,” “temporary grass,” “permanent grass,” “natural grass,” and the “FIFA 2-star” rating for artificial turf.

I likewise request a record of all communications between PavCO and any other entity or individual regarding the field surface for the FIFA Women’s World Cup Canada 2015, including but not limited to any officer or employee of Sport Canada, FIFA, the Canadian Soccer Association, and the National Organizing Committee for the FIFA Women’s World Cup Canada 2015.

2. With respect to providers of artificial turf surfaces, I hereby request copies of records and communications referencing any company, corporation, or business that supplies, installs, or maintains artificial turf playing surfaces at any stadium site hosting a FIFA World Cup Canada 2015 match, including but not limited to any records or communications regarding payments from such artificial turf companies to the Canadian Soccer Association or FIFA.

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By "records," I mean copies of any and all drafts or final versions of correspondence, including, but not limited to: electronic mail, instant messages, and/or letters; and any and all drafts or final versions of: memoranda, meeting agendas, and any other documents that were created, prepared, sent, edited, or received by PavCO and its officers and employees.

Pursuant to the *Access to Information Act*, I anticipate receiving all responsive records within 30 days. If you deny this request in part, please produce the documents to which I am entitled to access. If you choose to deny this request in whole or in part, I anticipate receiving a written notice within 30 days explaining why you believe I am not entitled to any or all of the records described above.

If you anticipate any copying or other costs associated with this request, please provide me with an estimate prior to incurring those costs.

Please send the request records and any correspondence associated with this request to the undersigned.

Finally, do not hesitate to contact me regarding any aspect of this request. Thank you for your consideration.

Yours very truly,



Catherine Gleason-Mercier
CGM:am