

21 September 2021

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**Re: Letter to Smokey**

Dear Graham:

Thank you for your communication on 20 September 2021 regarding our proposal for both parties to consent to pre-conciliation mediation. The CAAT-A Bargaining Team was pleased to learn that you are considering the proposal, pending clarification of a few questions.

We appreciate your offer to set your proposals aside and engage in mediation toward a negotiated settlement. During consultation with our Local Presidents and Bargaining Advisory Committee, they made it clear that the offer of settlement that you tabled on Wednesday is not acceptable. That said, they were wholly in favour of pursuing pre-conciliation mediation.

We agree that mediation is a worthwhile exercise, and we are willing, without prejudice, to set aside our current proposals and work with the mediator to determine the scope of these discussions. While our members sent a modest list of 17 demands to the table, we are certainly willing to have a mediator assist the parties in determining a path forward to an agreement.

Further, we certainly agree that both teams can work with the mediator to determine ground rules that govern both parties, including what are normal foundational rules in mediation: that the discussions during mediation are not public, are without prejudice, and will not be disclosed by either party.

With regard to your questions about timing, our goal is still to reach a settlement by September 30. While we fundamentally disagree with your summary of our bargaining history to date this round, we understand that both teams' perspectives will certainly need to be shared during our discussions.

To be clear, we have not chosen a mediator, only proposed one based on past experience. In 2014, Peter Simpson was acceptable to both teams and helped them reach a negotiated settlement. That he is familiar to both the CEC and CAAT-A/OPSEU/SEFPO, along with his familiarity with the sector, is what led our team to recommend him. This was intended as a suggestion, and based on availability. We note that in other of your proposals you suggested Gerry Lee as a mediator, and William Kaplan as an arbitrator as well.

It has been the common practice for both parties to share costs, but I will leave that to President Thomas to confirm.

We trust that this addresses the questions you've posed in your letter, thank you for sharing your thoughts, and look forward to your response.

Sincerely,

JP Hornick

On behalf of the CAAT-A Bargaining Team