



September 20, 2021

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Warren "Smokey" Thomas, President,  
JP Hornick, Chair, CAAT-A Bargaining  
Ontario Public Service Employees Union  
100 Lesmill Rd.  
Toronto, ON M3B 3P8

## **Re: Mediation Proposal**

Dear Smokey and JP:

As Smokey has instructed us, we are writing you in your capacity as OPSEU's chief agent and Chair of the Bargaining Team, respectively, because this matter involves the administration of our bargaining process and possible resolution.

At negotiations on Friday, September 17, 2021, the CAAT-A bargaining team proposed that the parties jointly engage the services of a mediator to assist the parties. While the colleges are trying to successfully conclude a Collective Agreement, we need to be very clear: we do not believe that mediation has any prospect of success so long as CAAT-A maintains its long list of demands. We have repeatedly advised the bargaining team of this.

There remain numerous outstanding questions that we have asked in an effort to find common areas and solutions. We even wrote the bargaining team about this concern on September 13, 2021 (copy attached).

We had hoped to have a discussion based on interests with the CAAT-A team in order to find common ground. They have refused and repeatedly asked instead that we table a full set of demands. We have done as the CAAT-A team has asked and have tabled a full set of management proposals. Our concern remains that with both the Union's and management's full demands on the table, bargaining will be long, difficult, and unsuccessful.

In an effort to secure a collective agreement renewal by September 30th, we have now tabled a without prejudice settlement offer that puts our full set of proposals aside and asks the CAAT-A bargaining team to do the same so that we may reach a collective agreement that addresses our shared areas of interest.

If the bargaining team is suggesting with Friday's mediation proposal that, as we have done with our long list, both parties put their long lists of demands aside and engage a mediator to

assist in settling based on an extension agreement with very few changes, we believe mediation may be a worthwhile exercise.

In view of the above, and because OPSEU is responsible for these matters, we would appreciate hearing from you with respect to the particulars of how the Union sees mediation working. We expect that the parties would share the cost of the mediator. Some of the questions we have are about the process include: how was the proposed mediator chosen? What is the expected timing? Will the Union agree that all discussions during the mediation are not public, will be without prejudice, and will not be disclosed by either party?

These are very important issues that we believe need to be addressed before we can engage in serious consideration of mediation.

Thank you very much, we look forward to hearing from you.

Sincerely,

A handwritten signature in black ink, appearing to be 'Graham Lloyd', written in a cursive style.

Graham Lloyd  
CEO

- c. Peter McKeracher, Vice-President, Labour Relations College Employer Council  
Laurie Rancourt, Chair, Academic Bargaining Team, Humber College