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Our File: ORO 2-571054-2  
Notre dossier:

Your File:  
Votre dossier:

December 23, 2015

**VIA FACSIMILE**

Roger Bilodeau, Q.C.  
Registrar  
Supreme Court of Canada  
301 Wellington Street  
Ottawa, Ontario  
K1A 0J1

Dear Sir:

**Re: Mounted Police Association of Ontario/Association De La Police Montee De L'Ontario and B.C. Mounted Police Professional Association on their own behalf and on behalf of all members and employees of the RCMP  
Court File No.: 34948**

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The Attorney General of Canada responds to the letter filed by the intervener Canadian Police Association (CPA).

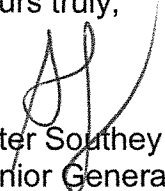
CPA was granted intervener status in this appeal by Order of Lebel J. dated July 25, 2013. That Order specifically provided "The interveners are not entitled to raise new issues or to adduce further evidence or otherwise to supplement the record of the parties."

CPA is not a party, and has no standing to make submissions in this motion. It, and all other interveners were served with the Attorney General's motion as a courtesy.

Though further response should be unnecessary, the Attorney General of Canada also notes that in as far as the CPA supports the position of the MPAO, the Attorney General of Canada has responded to those submissions in her reply to the parties. In response to the CPA suggestion that the RCMP be required to recognise particular associations as workplace representatives, the Attorney General of Canada notes that this would amount to the RCMP providing an advantage to certain associations over others which may also wish to seek to represent RCMP members. Such a suggestion should not be entertained by this Court.

The Attorney General of Canada submits that this Court should wholly disregard the improper submissions of the intervener CPA.

Yours truly,

  
Peter Southey  
Senior General Counsel  
Business & Regulatory Law Division  
PS:jt

c. All Parties