

June 25, 2021

**VIA EMAIL** ali.naraghi@greenpeace.org

Greenpeace Canada  
33 Cecil Street  
Toronto, ON M5T 1N1

**Attention: Ali Naraghi**

Dear Sir:

**Re: Notice to Participant for Response  
Reply to Letter from Greenpeace Canada (the “Participant”)**

I am in receipt of your letter of June 22, 2021, which contained several requests with respect to the Notice to Participant for Response of June 18, 2021 (the “Notice”). I provide my responses to those requests here.

*Is the Notice a notice under s. 13 of the Public Inquiries Act?*

The Notice was not intended to be a s. 13 notice. As I indicated in the Notice, I do not intend to make findings of misconduct. I have granted you standing as a Participant for Response on the basis that you have been identified as being potentially involved in an anti-Alberta energy campaign. Under the Terms of Reference, I may grant standing to those who may be directly or substantially affected by the subject-matter of the inquiry or those who have a clearly ascertainable interest or perspective to assist the inquiry to fulfill its mandate.

I am sensitive to the concerns you or others may have with this potential finding, so, in an abundance of caution and having full regard to my obligations with respect to procedural fairness, I provided you the Notice and invite you to respond. The Final Report will benefit from your participation and particularly to the extent you can verify or correct the information on which I have based the potential findings.

*If the Participant decides not to file submissions and/or evidence, will findings be made with respect to the Participant?*

The Notice indicated that I would not make any finding with respect to the Participant until I have had an opportunity to consider and analyze any submissions the Participant makes in this process. However, if the Participant chooses not to make submissions, then the potential finding may stand as

a finding in the Final Report, if not otherwise amended in light of other submissions or evidence that may arise from this process.

I encourage and welcome you to provide any submissions and/or evidence to assist me in meeting my mandate to deliver a fair, balanced and comprehensive report to Albertans.

*Have all documents in the possession of the Inquiry that reference the Participant been made available in the Dataroom?*

The documents on which I have relied in making potential findings with respect to the Participant are identified in the sections of the draft report included in the Dataroom; copies of these documents will be accessible via hyperlink and/or in the Dataroom.

As for documents in the possession of the Inquiry that may reference the Participant but that have not been relied upon, if any exist, I do not intend to provide those in the Dataroom. As you can imagine, many thousands of documents have been collected in the course of this Inquiry, but only those relied upon in the draft report have been identified in the Dataroom.

*What are the findings and/or documents relied upon with respect to any findings with respect to the Participant?*

The potential findings with respect to the Participant being involved in anti-Alberta energy campaign are addressed in Part III of the draft Report, and there is a separate section in respect of each Participant. Participants will be given access to the portion of Part III pertaining to their organization. The documents relied upon are identified in that section and copies of these documents will be accessible via hyperlink and/or in the Dataroom.

I have also included Part IV on foreign funding. I would direct your attention specifically to the heading "Foreign funding received by Canadian ENGOs". The documents relied upon in this Part are similarly identified and accessible.

Finally, I have provided in large part the remainder of the draft Report in the interest of providing context and inviting other comments you may have.

*When will access to the Dataroom be granted?*

Access to the Dataroom will be available shortly and the Inquiry will email you as soon as content is uploaded for your review, which is anticipated to be by Tuesday morning, June 29, 2021.

Again, I thank you for your participation in this process. Subject to further notice, the deadline for responses is July 16, 2021 and the deadline for preparing the Final Report remains July 30, 2021. I remain of the view that the time and other limits for response are reasonable in light of the nature and scope of the potential findings, and the fact that the supporting documentation is in the public record. Of course, I remain open to hearing concerns you may have with the process as you proceed and to

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considering what further opportunities may be appropriate in the interest of procedural fairness, to the extent they may be within my power to grant.

Yours truly,



**J. Stephens Allan**

**Commissioner, Public Inquiry into Anti-Alberta Energy Campaigns**