

ALBERTA ENERGY REGULATOR

PROCEEDING ID 449

IN THE MATTER OF the *Responsible Energy Development Act*, SA 2012, c R-17.3 ("**REDA**") and the Regulations and Rules made there under;

AND IN THE MATTER OF Application Nos. 1945552, 1945553, 001-00496728, 001- 00496729, 001-00496730, 32212208, and 32900389 under the *Coal Conservation Act*, RSA 2000, c C-17, the *Environmental Protection and Enhancement Act*, RSA 2000, c E-12, the *Water Act*, RSA 2000, c W-3, and the *Public Lands Act*, RSA 2000, c P-40, and the Regulations made thereunder (collectively, the "**Applications**"), made by Summit Coal Inc. ("**Summit**")

**RESPONSE SUBMISSIONS OF AWA and CPAWS NAB
TO SUMMIT'S MOTION FOR RECONSIDERATION
DATED AUGUST 6, 2025**

August 15, 2025

I. INTRODUCTION

1. Alberta Wilderness Association (“AWA”) and Canadian Parks and Wilderness Society, Northern Alberta Chapter (“CPAWS NAB”) oppose Summit’s reconsideration request dated August 6, 2025 (the “Request”) for the Alberta Energy Regulator (“AER”) to reconsider its July 23, 2025 decision denying Summit’s motion to cancel the hearing in this proceeding (the “Decision”). The Request is procedurally improper, substantively without merit, and, if granted, would undermine the AER’s ability to fulfill key aspects of its mandate.
2. The Request raises two primary issues:
 - a. whether the AER should exercise its discretion to reconsider the Decision; and
 - b. if so, whether the AER should vary or confirm the Decision.
3. In addition, AWA and CPAWS NAB submit that two preliminary issues must be addressed at the outset: (1) the proper scope of this reconsideration, and (2) the proper procedure for requesting reconsideration. Both go directly to the integrity of the AER’s process.
4. The only decision properly before the AER is its July 23, 2025 Decision denying Summit’s motion to cancel the hearing.¹ While Summit also seeks to revisit other decisions, such as those issued on October 3, 2024 and February 7, 2025, those decisions are not within the scope of this Request and cannot be addressed on this motion. Summit’s attempt to improperly broaden the scope of its Request and reopen decisions made many months ago, after numerous procedural and substantive steps have been taken in reliance on them, undermines the predictability, orderliness, and efficiency that are essential to the AER’s mandate.

¹ Motion of Summit Coal Inc. to the Chief Executive Officer of the Alberta Energy Regulator (August 6, 2025) (“Summit’s Reconsideration Request”), at para 1.

5. Further, AWA and CPAWS NAB oppose Summit's request to have the matter decided by the CEO. Neither the governing legislation, the regulations, nor established practice permit a party to direct a reconsideration request to the CEO. This is not an isolated procedural misstep, it is the latest in a series of attempts by Summit to prevent the hearing from proceeding at all. Seeking to bypass the normal route threatens both the integrity of the AER's process and the rights of AWA and CPAWS NAB to a fair, properly constituted hearing. The AER should firmly reject these tactics.
6. In any event, the Request fails to meet the stringent test for reconsideration, which requires showing extraordinary circumstances that provide exceptional and compelling grounds to revisit a decision. The Decision not to cancel the hearing was reasonable, firmly grounded in the legislative and regulatory framework, and consistent with established precedent. Summit has identified no statutory provision or precedent authorizing, let alone requiring, cancellation of a hearing while opposing parties remain.
7. Summit's Request, in substance, is a thinly veiled collateral attack on the AER's settled decisions granting AWA and CPAWS NAB full participant status. Having chosen not to challenge those rulings when they were made, Summit now seeks to re-litigate them under the guise of cancelling the hearing, advancing the unfounded premise that these parties lack equal procedural rights. This tactic is contrary to REDA, unsupported by precedent, and aimed at stripping AWA and CPAWS NAB (and future parties) of the status and rights the AER has already confirmed.
8. For these reasons, and those set out in detail below, the Request should be dismissed in its entirety, or in the alternative, the Decision should be confirmed.

II. SUBMISSIONS

A. Preliminary Issues

i. The Proper Scope of this Reconsideration

9. Summit's Request seeks reconsideration of the AER's July 23, 2025 Decision.²

Although the Request purports to be limited to that Decision, Summit attempts to expand its scope by asking the AER to "set out the AER's views" on additional matters arising from earlier decisions, including those dated October 3, 2024 and February 7, 2025.³

10. This amounts to a clear attempt to improperly expand the scope of reconsideration to matters long settled. Summit offers no explanation for failing to appeal or seek reconsideration of those prior decisions at the time they were made. Instead, it chose to remain silent, allowing numerous procedural steps and substantive rulings to occur in reliance on those decisions.

11. Summit cannot now revisit or re-litigate these settled matters. REDA section 42 does not provide a backdoor for parties to rehash grievances or mount broad attacks on prior procedural rulings. Its purpose is narrow and reserved for genuine reconsideration of specific errors or new evidence.⁴ Summit's attempt to use section 42 as means to vent its general frustrations with the process distorts its function.

² Summit's Reconsideration Request, at para 1.

³ Summit's Reconsideration Request, at paras 5-6. Despite limiting its request to Exhibit 89, Summit also focuses its Request on AER's decision to grant a hearing (Exhibit 3) and to grant full participant status to various Indigenous groups (Exhibits 37 to 40).

⁴ Past reconsideration decisions have focused on specific errors or new evidence in relation to a particular decision. For example see Alberta Energy Regulator, *Request for Reconsideration No 1956259* (2 July 2025), online (pdf): <<https://www.aer.ca/prd/documents/decisions/regulatory-appeal-decision/1956259-20250702.pdf>>; also see: Alberta Energy Regulator, *Request for Reconsideration No.: 1942728, Request for Reconsideration of Suncor's McClelland Lake Wetland Complex Operational Plan for the Fort Hills Oil Sands Project (Operational Plan)* (November 23 2023), online (pdf): <<https://www.aer.ca/documents/decisions/regulatory-appeal-decisions/1942728-20231123.pdf>>.

12. Permitting a party to improperly expand the scope of its reconsideration request to revisit decisions made months earlier would fundamentally undermine the principles of certainty and predictability that are essential to the AER's regulatory process. While Summit invokes the need for certainty and predictability, its approach contradicts these principles. Allowing reconsideration of long-finalized decisions would also set a troubling precedent by encouraging parties to delay requests for reconsideration for months or even years. This would create significant uncertainty and risk unravelling years of procedural progress, to the detriment of all stakeholders and the orderly administration of proceedings.

13. Summit also seeks to use this Request to invite the AER to "reconsider the currently limited roles of AER hearing commissioners within the AER more broadly."⁵ This invitation is plainly beyond the scope of the reconsideration and cannot be properly addressed on this motion. Broader policy questions of this nature are unsuited to resolution within the confines of a request focused on a specific decision in a particular proceeding. They require broader public consultation and a deliberate decision-making process. Accordingly, the AER should decline to entertain this inappropriate expansion of the reconsideration scope.

14. In summary, the AER must reject any effort to broaden the reconsideration beyond the July 23, 2025 Decision. Upholding the proper scope is essential to maintaining procedural fairness, preserving the integrity of the regulatory process, and safeguarding the AER's ability to fulfill its statutory mandate effectively.

ii. The Proper Procedure for Requesting Reconsideration

15. AWA and CPAWS NAB submit that Summit's decision to address its Request directly to the CEO was improper and inconsistent with established practice of directing reconsideration requests to the Regulatory Appeals Coordinator. The

⁵ Summit's Reconsideration Request, at para 20.

governing rules do not authorize an applicant to choose its decision-maker, and past practice has consistently been to submit such requests through the established channels.⁶

16. In its August 8, 2025 decision on Summit's adjournment motion, the AER expressly directed parties not to send correspondence to the CEO.⁷ Further, Summit has cited no instance, nor are AWA and CPAWS NAB aware of any, where a reconsideration request was sent directly to the CEO. The established practice has been to submit these requests to the Regulatory Appeals Coordinator for processing in accordance with the AER's standard procedures.
17. While AWA and CPAWS NAB acknowledge that the CEO may have authority to hear reconsiderations in some cases, it is not for Summit to dictate who will decide its Request based on its perception of a favourable outcome. REDA section 12(1) provides that where the AER conducts a hearing in respect of a reconsideration, "the hearing must be conducted... by a panel of one or more Hearing Commissioners selected by the Chief Hearing Commissioner."⁸ Although the legislation is silent on the procedure where no hearing is held, it does not follow that the requesting party may select its own decision-maker. That determination rests solely with the AER.
18. Summit relies on the CEO's general responsibility for the day-to-day operations of the AER as a basis to request that the CEO decide its Request. However, operational oversight does not equate to authority over reconsideration decisions. In fact, REDA expressly prohibits the CEO from being appointed as a hearing commissioner, the

⁶ For example: Ecojustice, *Request for Reconsideration of Administrative Penalty Director's Decision No 202408-009* (27 November 2024), online (pdf): <<https://ecojustice.ca/wp-content/uploads/2024/11/2024-11-27-Request-for-Reconsideration.pdf>>; also see: Alberta Wilderness Association, *Request for Reconsideration No 1942728* (21 June 2023), online (pdf): <[20230621_lt_mcc_fhosp_awa_reply_to_suncor_aer_reconsider.pdf](#)>.

⁷ 2025-08-08 AER to Parties re Motion Decision, at page 1.

⁸ REDA, s 12(1).

very role empowered to hear reconsideration hearings, thereby underscoring that such decisions ordinarily fall outside the CEO's mandate.⁹

19. This is not an isolated procedural misstep on the part of Summit. Summit's plea to the CEO is the latest in a pattern of attempts to circumvent the established process.

Throughout this proceeding, Summit has:

- a. sent letters directly to the AER rather than filing motions in the prescribed manner, despite being told that such correspondence was improper;¹⁰
- b. attempted to side-step the regulatory process altogether by appealing directly to the Minister;¹¹ and
- c. now seeks to involve the CEO directly.

20. Such tactics undermine the integrity of this process and should be firmly rejected.

21. Only the AER has the authority to determine who will hear a reconsideration request without a hearing. Summit has provided no compelling reason to depart from the standard and legislated practice whereby the chief hearing commissioner selects a panel of one or more hearing commissioners. Upholding that practice in this case will preserve the impartiality, orderliness, and integrity of the AER's decision-making framework.

⁹ REDA, s 11(3) and 12(1)(c).

¹⁰ Exhibit 74; and Exhibit 81 in which the AER reminds Summit that "Parties were made aware via the letter dated March 3, 2025 (exhibit 53.0) that 'all participants in proceeding 449 are directed to make further motions formally and in accordance with section 44 of the *Rules*.'"

¹¹ 2025-08-01 – AWA and CPAWS NAB Response to Motion to Adjourn ("**AWA and CPAWS Response to Motion to Adjourn**"), Appendix 2 titled "Brian MacDonald Letter to Minister Biran Jean on behalf of Valory Resources (July 28, 2025)."

B. The AER Should Decline to Reconsider the Decision

i. Summit Has Not Met the Test for Reconsideration

22. The AER applies a strict and well-established test when exercising its discretion under REDA section 42 to reconsider a decision. This discretion exists to address extraordinary circumstances such as the emergence of new information or the discovery of an error so fundamental that leaving the decision in place would render it without value or merit. It is not intended as a substitute appeal process for parties dissatisfied with the outcome. Given the appeal mechanisms already available under REDA and the need for finality and certainty in its decisions, the AER will only reconsider where there are exceptional and compelling grounds to do so. Mere disagreement with the decision is not sufficient.¹²
23. There is no new information before the AER since its July 23, 2025 Decision. It follows that Summit can only succeed if it demonstrates an error so profound that it would be absurd not to revisit the Decision. Summit has not met this high threshold. As will be discussed below, the Decision not to cancel the hearing was reasonable, consistent with the governing legislative and regulatory framework, aligned with past AER decisions, and falls squarely within the AER's mandate to ensure the efficient, safe, orderly, and environmentally responsible development of Alberta's energy and mineral resources.
24. Further, Summit's Request is an attempt to invoke section 42 as a backdoor appeal, seeking to re-argue matters already determined and thereby eroding the finality and certainty that are fundamental to the AER's process. It also constitutes a collateral attack on the rights of AWA and CPAWS NAB, both of whom are full participants to this proceeding and entitled to the same procedural rights as any other party.¹³ By

¹² Alberta Energy Regulator, *Request for Reconsideration No 1956259* (2 July 2025), online (pdf): <<https://www.aer.ca/prd/documents/decisions/regulatory-appeal-decision/1956259-20250702.pdf>>, at page 2.

¹³ Exhibits 41 and 42.

attempting to cancel the hearing altogether, Summit is effectively seeking to deny these parties their right to be heard on the merits. Such tactics are antithetical to procedural fairness, contrary to the proper administration of justice, and inconsistent with the AER's statutory mandate. The Request should be dismissed outright.

ii. The AER Correctly Interpreted and Applied Relevant Legislation and Precedent

25. Contrary to Summit's submission, the Decision panel (the "**Panel**") did not disregard Summit's arguments on REDA section 34. The Panel expressly acknowledged Summit's interpretation,¹⁴ but correctly found that subsection 34(1) permits the AER to grant a hearing at its sole discretion, and that nothing in subsections 34(2) or 34(3) constrain AER's ability to hold a hearing where the AER considers it appropriate.
26. Section 34(2) sets out the circumstances in which a hearing is mandatory. Section 34(3) merely affirms that persons who may be directly and adversely affected are entitled to be heard if a hearing is held. Where section 34(2) is not engaged, the AER's decision to hold a hearing is guided by its statutory mandate and the non-exhaustive factors in REDA section 7 (discussed below).
27. The Panel therefore made no error in its interpretation or application of section 34. Nothing in this section requires the AER to cancel the hearing in these circumstances and the Panel's Decision not to cancel the hearing was reasonable. Summit's disagreement with the Panel's interpretation does not amount to a legal error and certainly does not render the Decision without merit such that it would be absurd not to reconsider it.
28. The Panel also correctly recognized that, once the AER grants party status under Rules 9(1) and 9(2), there is no legal distinction between participants who are

¹⁴ Exhibit 89, at page 2.

directly and adversely affected and those who are not.¹⁵ AWA and CPAWS NAB, as full participants, are entitled to the same procedural rights as any other party. Summit's attempt to revisit or diminish that status is irrelevant and improper. The Panel properly rejected Summit's line of argument on three separate occasions.¹⁶

29. Likewise, the Panel reasonably applied Rules 6.2 and 7. These provisions are permissive, guiding the AER's discretion rather than imposing mandatory constraints.¹⁷ A discretionary power to consider certain factors does not create a legal obligation to apply them in a particular way, and the AER commits no error by exercising that discretion differently than Summit would prefer.

30. Furthermore, AWA and CPAWS NAB's status as parties was not dependent on the presence of other parties that may be directly and adversely impacted by the project. AWA demonstrated unique expertise in wildlife and habitat conservation in the Kakwa and Little Smoky regions, as well as concerns about impacts on water quality and aquatic species. CPAWS NAB showed established conservation work in the Kakwa–Little Smoky–Swan Hills area, identified methodological flaws in Summit's reclamation plan, and offered expertise in mitigation planning. Both offered non-duplicative, relevant evidence capable of materially assisting the Panel.¹⁸

31. These are legitimate considerations for the AER when deciding to grant participation under Rule 9. They also align with several of the considerations set out in Rule 7 for

¹⁵ Exhibit 89, at pages 3 and 4.

¹⁶ Exhibit 89, at page 4 where the Panel states “This is an argument that has been heard and denied at the participation stage, and again in the panel's procedural decision in Exhibit 53.0. For clarity, the panel granted participation to CPAWS NAB and AWA. Any further challenges to the participation decisions will be construed as a collateral attack.”

¹⁷ *Alberta Energy Regulator Rules of Practice*, Alta Reg 99/2013 (“**Rules**”) at ss 6.2 and 7, both of which state that “The Regulator may....”.

¹⁸ Exhibits 41 and 42.

determining whether to hold a hearing. For example, AWA and CPAWS NAB's participation applications raised:

- 7(b): unresolved objections;
- 7(c): inadequate efforts by Summit to address those objections;
- 7(g): the potential for substantial and adverse effects on high-quality wildlife habitat;
- 7(h): the potential for substantial and adverse effects on the aquatic environment, including water quality and aquatic life; and
- 7(j): the potential to raise information that could materially assist the Panel.¹⁹

32. Therefore, the granting of participant status to AWA and CPAWS NAB was not contingent on other parties being directly and adversely affected. Rather, their participation was intrinsically linked to the same considerations that supported holding the hearing in the first place. The decision to grant the hearing was never meant to be solely dependent on the presence of directly and adversely affected parties. Summit's fixation on the absence of directly affected parties is unsupported by REDA or the Rules.

33. The Panel's Decision is also entirely consistent with precedent. The AER has never cancelled a hearing while full participants with standing and active opposition remain. The only examples Summit identifies involve cancellations after *all* objectors had withdrawn. These are fundamentally different circumstances. The Panel did not impose an unreasonable onus or ignore relevant precedent; it correctly found that Summit had failed to establish any precedent supporting its position.²⁰

¹⁹ Rules, s 7.

²⁰ Exhibit 89, at page 4 where the Panel found, "The examples provided by Summit of prior AER decisions to cancel a hearing were situations in which all parties to the hearing withdrew. This is not the same situation.... The caselaw cited advises us that a duty of procedural fairness is "highly contextual" and "eminently variable". We are not persuaded that the circumstances in this proceeding warrant cancelling the hearing."

34. Adopting Summit's approach would require the AER to create an entirely new precedent – cancelling hearings despite the continued opposition of full participants. This would undermine established procedural rights and the integrity of the hearing process. The absence of any such precedent underscores why Summit's request should fail.

35. As the party seeking reconsideration, Summit bears the burden of demonstrating extraordinary and compelling grounds. It has identified no statutory provision or precedent authorizing, let alone requiring, cancellation of a hearing while full participant objectors remain. At most, Summit posits alternative interpretations of the legislation. That is insufficient to meet its burden and falls far short of the high standard for reconsideration.

iii. Summit's Request is a Collateral Attack on AWA and CPAWS NAB's Party Status

36. Since AWA and CPAWS NAB applied for, and were granted, full participant status in this proceeding, Summit has pursued a sustained campaign to demean, discredit, and undermine their role. Summit has made no secret of its view that AWA and CPAWS NAB should never have been recognized as full participants, despite the AER's clear and final determinations to the contrary.²¹ This Request is nothing more than an attempt to re-litigate and overturn those decisions under the guise of seeking to cancel the hearing. Such conduct constitutes an improper collateral attack on settled procedural rulings.

37. From the outset, Summit opposed AWA and CPAWS NAB's participation solely on the ground that they were not "directly and adversely affected," disregarding the other factors under Rule 9. The AER nevertheless granted full participant status based on those other factors. Summit did not appeal or seek reconsideration of those decisions, and they are not open to challenge now.

²¹ Exhibits 41 and 42.

38. Summit has nonetheless sought to discredit and undermine AWA and CPAWS NAB's participation, even resorting to defamatory remarks. Examples include:
- a. Repeatedly characterizing AWA and CPAWS NAB as "private organizations"²² despite both having membership open to the public and broad public support across Canada;²³
 - b. Repeatedly stating that AWA and CPAWS NAB have "no connection to the area"²⁴ despite both having members and supporters who live and work in the Grande Cache. For example, CPAWS NAB alone has over 300 supporters who work in the greater Grande Prairie region, which includes the Grande Cache.²⁵
 - c. Repeatedly and intentionally mischaracterizing AWA's participation as being about improving fundraising.²⁶ This is a gross distortion of AWA's request to participate, which clearly articulated its responsibility to its supporters and its mission to advocate for Alberta's air, land, water, and wildlife.²⁷
 - d. Stating that it would not be prepared to pay any costs to AWA and CPAWS NAB despite this decision resting squarely with the AER.²⁸
39. This Request repeats the same improper theme by fabricating a non-existent hierarchy among full participants to diminish AWA and CPAWS NAB's legal rights. As the Panel correctly recognized, neither REDA nor the Rules create such distinctions. Once granted full participant status under Rule 9, a party enjoys the same procedural fairness and due process rights as any other party, regardless of

²² Exhibits 52, 74 and 83.1.

²³ Exhibits 41 and 42.

²⁴ Exhibits 80 and 83.1.

²⁵ Exhibits 41 42.

²⁶ Exhibits 52; also see Summit's Reconsideration Request, at para 77.

²⁷ Exhibit 23.

²⁸ Exhibit 52; also see AWA and CPAWS Response to Motion to Adjourn, Appendix 2.

whether they are directly and adversely affected. The Panel’s reasoning on this point is set out below:²⁹

Once the panel has granted participation, there is no distinction between participants, as is confirmed by the following definitions in the *Rules*:

1(i.1) “participant” means, except in Division 2 of Part 5, a person who is permitted by the Regulator under section 9 or 31.2 to participate in a hearing on an application or regulatory appeal, but does not include an applicant or a requester;

(j) “party” means

- (i) in the case of a hearing on an application,
 - (A) an applicant, or
 - (B) a participant...

40. Meanwhile, Summit’s interpretation would have the AER create a distinction between different categories of full participants where none exist. Not only is this position inconsistent with the Rules and an attack on AWA and CPAWS NAB procedural rights, but it also threatens the participatory rights of all full participants who do not meet a narrow threshold that the AER did not impose. This is not a reasonable or credible reading of the legislative framework and, as discussed above, is without precedent.

41. Summit’s interpretation also runs contrary to the AER’s mandate to provide for the environmentally responsible development of energy and mineral resources in Alberta.³⁰ That mandate necessarily extends to participants with expertise on environmental impacts, even if they are not directly and adversely affected. The AER’s focus on the environmental impacts of projects is evident throughout its past decisions and reports.³¹ AWA and CPAWS NAB have raised ongoing, credible

²⁹ Exhibit 89, at page 3.

³⁰ REDA, s 2(1)(a).

³¹ *Livingstone Landowners Group v Northback Holdings Corporation*, 2025 ABAER 6; also see *Benga Mining Limited, Grassy Mountain Coal Project, Re* (2021), 2021 ABAER 010, online: <https://static.aer.ca/prd/documents/decisions/2021/2021ABAER010.pdf>.

concerns about the project's effects on wildlife habitat, water quality, and aquatic species that speak directly to this aspect of the AER's mandate.

42. Naturally, Summit's interpretation would not only undermine the AER's ability to fulfill its environmental mandate in this proceeding, but by effectively stripping the rights of all parties with legitimate environmental concerns, it would also compromise the AER's ability to carry out that mandate in future matters.
43. In summary, the AER granted AWA and CPAWS NAB full participant status because their contributions are relevant and speak directly to the AER's mandate, regardless of direct adverse impact. Summit's reconsideration is an overt attempt to re-litigate the AER's decisions granting AWA and CPAWS NAB full participant status and an attempt to impose additional requirements for participation that do not exist. The AER should firmly reject Summit's Request as both procedurally improper and substantively baseless.

iv. Unresolved Issues Necessitate a Hearing

44. In Appendix A of its Request, Summit purports to set out its position on the conditions proposed by AWA and CPAWS NAB. Summit did not consult AWA or CPAWS NAB on the sufficiency of these conditions, nor does the list accurately reflect the full set of conditions proposed or the concerns raised. AWA and CPAWS NAB's primary position remains that the project should not be approved; however, should approval be granted, it must incorporate robust and effective conditions to mitigate its impacts.
45. In any event, the adequacy of Summit's response to the concerns raised by AWA and CPAWS NAB cannot be resolved through a reconsideration request. These substantive unresolved issues require a full review of the complete record, including party submissions, evidence, and expert testimony. The continued dispute over the

project's adverse environmental impacts and the appropriateness of proposed conditions can only be properly addressed at a full hearing, where all parties have the opportunity to participate and present their positions.

C. Alternatively, the AER's Decision Should be Confirmed

46. As set out herein, AWA and CPAWS NAB submit that Summit has not met the stringent test for reconsideration and, as such, the AER should deny its Request. Alternatively, in the event the AER exercises its discretion to hear the Request, the AER should confirm the Decision for the reasons set out herein.

III. RELIEF

47. Reconsideration requests under REDA section 42 are not intended to provide a platform for a party to air its general grievances with the AER's process, nor to serve as a backdoor appeal to re-litigate decisions it disagrees with. Reconsiderations are equally not intended as a means to mount a collateral attack on the rights of opposing parties. Permitting such misuse would undermine the integrity of the AER's processes, disrupt the orderly administration of hearings, and erode the procedural protections afforded to all participants. For these reasons, and those set out above, AWA and CPAWS NAB respectfully request that the AER refuse to exercise its sole discretion to reconsider the Decision, or alternatively, confirm the Decision.

Respectfully submitted this 15th day of August, 2025.



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