

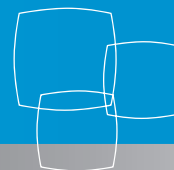


Industry
Canada

Industrie
Canada

PRIVACY ACT

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2014-15 Annual Report on the Privacy Act



**Annual Report
on the Administration
of the
*Privacy Act***

2014-2015

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Aussi offert en français sous le titre *Rapport annuel de 2014-2015 concernant la loi sur la protection des renseignements personnels*

Cat. No. Iu1-4/2E-PDF
ISSN 1925-7953

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PREFACE AND PURPOSE

The *Privacy Act* (Revised Statutes of Canada, Chapter A-1, 1985) was proclaimed on July 1, 1983.

The purpose of the *Privacy Act* “is to extend the present laws of Canada that protect the privacy of individuals with respect to personal information about themselves held by a government institution and to provide individuals with a right of access to that information” (Section 2 of the Act). The law also protects an individual’s privacy by preventing others from having access to that personal information and allows an individual specific rights concerning the collection and use of his/her information.

Section 72 of the *Privacy Act* requires that the head of every government institution prepare for submission to Parliament an annual report on the administration of this Act within the institution during each financial year.

This annual report is tabled in Parliament in accordance with section 72 of the *Privacy Act* and describes how Industry Canada administered its responsibilities for 2014-2015.

ABOUT THE ORGANIZATION

Industry Canada's Mandate

Industry Canada's mandate is to help make Canadian industry more productive and competitive in the global economy, thus improving the economic and social well-being of Canadians.

The many and varied activities Industry Canada carries out to deliver on its mandate are organized around three interdependent and mutually reinforcing strategic outcomes, each linked to a separate key strategy. The key strategies are shown in the illustration below.



Additional information is available on [Industry Canada's website](http://www.ic.gc.ca/eic/site/icgc.nsf/eng/h_00018.html) (http://www.ic.gc.ca/eic/site/icgc.nsf/eng/h_00018.html)

Information and Privacy Rights Administration

April 1, 2014, Information and Privacy Rights Administration (IPRA) was reporting to the Chief Information Office (CIO) but effective November 11, 2014, it became part of the Office of the Corporate Secretary (OCS) of Industry Canada. IPRA has a complement of 15 employees consisting of one Director, three managers, eight advisors and three support staff, all of whom are dedicated to processing access and privacy requests, as well as related functions.

IPRA is responsible for the implementation and management of programs and services relating to the administration of the *Access to Information Act* and *Privacy Act* (ATIP) for Industry Canada. Specifically, IPRA makes decisions on the disposition of access and privacy requests; promotes awareness of the legislation to ensure departmental responsiveness to statutory obligations; monitors and advises on departmental compliance with the Acts, regulations, procedures and policies; and acts as the spokesperson for the Department when dealing with the Treasury Board Secretariat, the Information Commissioner, the Privacy Commissioner, and other government departments and agencies. IPRA is also responsible for consulting with other federal departments and third parties with respect to ATIP requests received by Industry Canada.

Delegation of Authority

The existing ATIP Delegation Order was updated to reflect IPRA's new reporting structure and was approved by the Minister in November 2014. Pursuant to section 73 of the Acts, the Minister has delegated full authority to the Corporate Secretary, the Director and the Managers of IPRA. The designation of the Corporate Secretary position is for the purposes of providing strategic support and advice to the executive management of the Department concerning ATIP issues, if and when required. For all daily ATIP activities and operations, the Director and the Managers of IPRA exercise full responsibility (see Appendix B).

The Director of IPRA is responsible for the development, coordination and implementation of effective policies, guidelines and procedures to manage the Department's compliance with the Acts. The administration of the legislation within Industry Canada is managed by IPRA, but is also facilitated at the sector, branch and regional office levels. Each sector and corporate branch has an ATIP Liaison Officer (reporting to an Assistant Deputy Minister, Executive Director, etc.) who coordinates activities and provides guidance on the administrative processes and procedures of the Acts. IPRA, which is located in Ottawa, responds to all formal requests submitted to Industry Canada under both Acts.

ATIP Policies, Procedures and Business Practices

To improve the administration of the ATIP program, and to ensure that Treasury Board ATIP policies are respected and implemented, IPRA regularly develops and updates various internal guidelines, procedures, and business practices. IPRA communicates this information using various methods from direct interactions with departmental officials (i.e.: training and meetings), to publishing articles in the IC's weekly newsletter and/or posting on its intranet site. For example, in 2014-15, IPRA updated its intranet site to include guides on managing public consultations and privacy breaches.

IPRA continues to maintain its lean engineering practices by reviewing processes and eliminating redundant administrative activities to ensure a high-level compliance and performance as well as positive communications with its clients and stakeholders.

Training and Outreach

Enhanced awareness and knowledge of ATIP obligations on the part of departmental officials has shown to improve the quality of responses and the Department's rate of compliance with legal obligations.

IPRA updated its training products to reflect legislative and policy requirements, as well as to promote best practices in responding to ATIP requests and managing information. Throughout the reporting period, IPRA delivered 28 ATIP training/awareness sessions and was able to reach a total of 369 employees across the department. Most of this training was tailored to specific needs of various sectors.

Quarterly meetings continued to be held with Sector ATIP Liaison Officers throughout the reporting period. These meetings provided a forum to provide regular updates, discuss various ATIP issues, and ensure understanding of ATIP roles and responsibilities. Four meetings were held during the 2014-15 reporting period.

Finally, IPRA developed a series of messages designed to promote best practices and remind employees of legal and policy requirements related to privacy. These messages were communicated to all Industry Canada employees via the departmental weekly newsletter and were posted on the intranet site.

PRIVACY – TRENDS AND STATISTICS

Industry Canada's mandate is focused on Canadian businesses. The Department's programs and initiatives assist in building a more productive, competitive and knowledge-based economy for Canada. As a result, there are few privacy requests or privacy related issues.

A summarized statistical report on *Privacy Act* requests processed from April 1, 2014 to March 31, 2015 is found at Appendix A. An explanation and interpretation of the information contained in the statistical report follows.

Statistical Report – Interpretation and Analysis

Number of requests received and completed

In 2014-2015, the Department received 59 requests submitted under the *Privacy Act* as compared to 30 requests received during 2013-2014. This represents a 97 percent increase from the previous reporting period.

The Department completed 57 requests during this reporting period. However, following discussion with applicants, it was concluded that 53 percent consisted of information that was not under the control of Industry Canada and therefore, deemed either "abandoned" or "no records". The remaining six (6) requests were carried forward to the 2015-2016 reporting year.

In addition, the Department received and completed two (2) consultation requests from other government departments during the reporting period.

Nature of information requested

The privacy requests processed involved issues related to staffing exercises (such as rating guides and screening processes), performance, personal comments and/or bankruptcy files held by the Office of the Superintendent of Bankruptcy. This is in keeping with previous years.

Volume of pages processed

A total of 10,510 pages were processed and more than 7, 200 pages released during the reporting period.

Completion Time

The 57 requests were completed within the following timeframes:

- 26 within 1 to 15 days (45.6 percent)
- 17 within 16 to 30 days (29.8 percent)
- 13 within 31 to 60 days (22.8 percent)
- 1 within 61 to 120 days (1.75 percent)

Overall, 97 percent of these requests were completed within 60 days. With respect to monitoring the processing time of requests, IPRA has established the following business practices:

- Managers regularly review and monitor the status of privacy requests using the ATIP case management tool (Axxess-1);
- Managers conduct weekly operational meetings with staff to review work plans and establish priorities; and
- Managers report weekly to the Director on requests to be closed as well as on-time compliance.

Disposition of requests

The disposition of the 57 completed requests is as follows:

- 22 were disclosed in part (38.6 percent)
- 15 requests were abandoned (26.3 percent)
- 15 had no existing records (26.3 percent)
- 5 were fully disclosed (8.8 percent)

Limits to the right of access – Exemptions and Exclusions

Exemptions in accordance with sections 19 through 28 of the *Privacy Act* can be invoked to withhold information from being released to a requester. Several exempting provisions can be applied to withhold information in response to one request, and these are reported separately in the statistical report. However, the same exempting provision invoked to withhold information more than once within the same request is reported only once in the statistical report.

The statistics demonstrate that the Department only invoked three exempting provisions throughout the reporting period – sections 22, 26 and 27. This reflects the nature of the information held by the Department (i.e., personal information about other individuals contained in staffing files, legal advice, and administrative investigations carried out under the *Bankruptcy and Insolvency Act*).

The *Privacy Act* does not apply to published material, material available for purchase by the public, or confidences of the Queen's Privy Council for Canada, pursuant to sections 69 and 70 of the Act, respectively. No exclusions were invoked to refuse access to information during the reporting period.

Requests for Correction of Personal Information and Notations

No request for corrections or notations, were received for this reporting period. As a result, no monitoring processes were required during the reporting period.

Levelling of costs and human resources

IPRA

Total salary costs associated with IPRA administering the *Privacy Act* activities amounted to \$67,891 for this reporting period. Non-salary costs amounted to \$4,096 for a total cost of \$71,987.

The human resources required to administer the *Privacy Act* amounted to 0.84 full-time equivalents (FTE). This increases the FTE usage by 110 percent from the previous reporting period.

Department

Administrative costs as reported by program officials across the Department associated with retrieving, reviewing and providing information to IPRA amounted to \$15,044. The human resources outside of IPRA required to retrieve documents and provide recommendations totaled 0.23 FTEs.

Total Costs

The overall cost to administer the *Privacy Act* at Industry Canada amounts to \$87,031 for the reporting period. Total human resources required to administer the *Privacy Act* at Industry Canada for 2014-2015 was 1.07 FTEs.

Disclosures Under Subsection 8(2)(m)

Subsection 8(2) of the *Privacy Act* provides limited and specific circumstances under which institutions may disclose personal information without an individual's consent. Subsection 8(2)(m) allows institutions to release personal information if either the public interest in disclosure clearly outweighs any invasion of privacy that could result from the disclosure, or if the disclosure would clearly benefit the individual to whom the information relates.

During the reporting period, Industry Canada did not disclose personal information pursuant to paragraph 8(2)(m) of the *Privacy Act*.

Privacy Impact Assessments Completed During the Year

One privacy impact assessment (PIA) was completed during the reporting period. The PIA was a multi-institutional one involving Industry Canada (Competition Bureau), the Office of the Privacy Commissioner and the Canadian Radio-television and Telecommunications Commission.

The purpose of the PIA was to assess the privacy impacts arising from the administration and enforcement of Canada's Anti-Spam Legislation (CASL). The overall findings of the PIA confirmed that the administrative and enforcement activities to be undertaken in conjunction with CASL are likely to present a moderate risk to the privacy of individuals. A summary of the PIA is available [here](#).

Material Privacy Breaches

No material privacy breaches occurred during the reporting period.

Complaints, Audits, Investigations and Appeals

Applicants have the right of complaint pursuant to the Act and may exercise this right at any time during or after the processing of their request. The Department received six complaints during the reporting period – all of them concerning the extension of time limits.

The Office of the Privacy Commissioner (OPC) completed seven complaint investigations during the reporting period. The six time extension complaints were discontinued and one time

limit complaint (carried over from the previous reporting year) was considered well-founded by the OPC.

No court challenges were received during the reporting period, nor were any audits relating to the administration of the privacy legislation conducted during the reporting period.

APPENDIX A



Statistical Report on the *Privacy Act*

Name of institution: Industry Canada

Reporting period: 2014-04-01 to 2015-03-31

Part 1: Requests Under the *Privacy Act*

	Number of Requests
Received during reporting period	59
Outstanding from previous reporting period	4
Total	63
Closed during reporting period	57
Carried over to next reporting period	6

Part 2: Requests Closed During the Reporting Period

2.1 Disposition and completion time

Disposition of Requests	Completion Time							Total
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	
All disclosed	1	2	2	0	0	0	0	5
Disclosed in part	1	9	11	1	0	0	0	22
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
No records exist	10	5	0	0	0	0	0	15
Request abandoned	14	1	0	0	0	0	0	15
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	26	17	13	1	0	0	0	57

2.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
18(2)	0	22(1)(a)(i)	0	23(a)	0
19(1)(a)	0	22(1)(a)(ii)	0	23(b)	0
19(1)(b)	0	22(1)(a)(iii)	0	24(a)	0
19(1)(c)	0	22(1)(b)	2	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	0
19(1)(e)	0	22(2)	0	26	18
19(1)(f)	0	22.1	0	27	2
20	0	22.2	0	28	0
21	0	22.3	0		

2.3 Exclusions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
69(1)(a)	0	70(1)	0	70(1)(d)	0
69(1)(b)	0	70(1)(a)	0	70(1)(e)	0
69.1	0	70(1)(b)	0	70(1)(f)	0
		70(1)(c)	0	70.1	0

2.4 Format of information released

Disposition	Paper	Electronic	Other formats
All disclosed	5	0	0
Disclosed in part	5	17	0
Total	10	17	0

2.5 Complexity

2.5.1 Relevant pages processed and disclosed

Disposition of Requests	Number of Pages Processed	Number of Pages Disclosed	Number of Requests
All disclosed	90	83	5
Disclosed in part	9558	7133	22
All exempted	0	0	0
All excluded	0	0	0
Request abandoned	862	0	15
Neither confirmed nor denied	0	0	0
Total	10510	7216	42

2.5.2 Relevant pages processed and disclosed by size of requests

Disposition	Less Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
All disclosed	5	83	0	0	0	0	0	0	0	0
Disclosed in part	6	92	9	1517	4	1789	3	3735	0	0
All exempted	0	0	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Request abandoned	12	0	3	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	23	175	12	1517	4	1789	3	3735	0	0

2.5.3 Other complexities

Disposition	Consultation Required	Legal Advice Sought	Interwoven Information	Other	Total
All disclosed	0	0	0	0	0
Disclosed in part	0	1	11	0	12
All exempted	0	0	0	0	0
All excluded	0	0	0	0	0
Request abandoned	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0
Total	0	1	11	0	12

2.6 Deemed refusals

2.6.1 Reasons for not meeting statutory deadline

Number of Requests Closed Past the Statutory Deadline	Principal Reason			
	Workload	External Consultation	Internal Consultation	Other
1	1	0	0	0

2.6.2 Number of days past deadline

Number of Days Past Deadline	Number of Requests Past Deadline Where No Extension Was Taken	Number of Requests Past Deadline Where An Extension Was Taken	Total
1 to 15 days	0	1	1
16 to 30 days	0	0	0
31 to 60 days	0	0	0
61 to 120 days	0	0	0
121 to 180 days	0	0	0
181 to 365 days	0	0	0
More than 365 days	0	0	0
Total	0	1	1

2.7 Requests for translation

Translation Requests	Accepted	Refused	Total
English to French	0	0	0
French to English	0	0	0
Total	0	0	0

Part 3: Disclosures Under Subsections 8(2) and 8(5)

Paragraph 8(2)(e)	Paragraph 8(2)(m)	Subsection 8(5)	Total
0	0	0	0

Part 4: Requests for Correction of Personal Information and Notations

Disposition for Correction Requests Received	Number
Notations attached	0
Requests for correction accepted	0
Total	0

Part 5: Extensions

5.1 Reasons for extensions and disposition of requests

Disposition of Requests Where an Extension Was Taken	15(a)(i) Interference With Operations	15(a)(ii) Consultation		15(b) Translation or Conversion
		Section 70	Other	
All disclosed	2	0	0	0
Disclosed in part	12	0	0	0
All exempted	0	0	0	0
All excluded	0	0	0	0
No records exist	0	0	0	0
Request abandoned	0	0	0	0
Total	14	0	0	0

5.2 Length of extensions

Length of Extensions	15(a)(i) Interference with operations	15(a)(ii) Consultation		15(b) Translation purposes
		Section 70	Other	
1 to 15 days	0	0	0	0
16 to 30 days	14	0	0	0
Total	14	0	0	0

Part 6: Consultations Received From Other Institutions and Organizations

6.1 Consultations received from other Government of Canada institutions and other organizations

Consultations	Other Government of Canada Institutions	Number of Pages to Review	Other Organizations	Number of Pages to Review
Received during the reporting period	2	22	0	0
Outstanding from the previous reporting period	0	0	0	0
Total	2	22	0	0
Closed during the reporting period	2	22	0	0
Pending at the end of the reporting period	0	0	0	0

6.2 Recommendations and completion time for consultations received from other Government of Canada institutions

Recommendation	Number of Days Required to Complete Consultation Requests							Total
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	
All disclosed	2	0	0	0	0	0	0	2
Disclosed in part	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	2	0	0	0	0	0	0	2

6.3 Recommendations and completion time for consultations received from other organizations

Recommendation	Number of days required to complete consultation requests							
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total
All disclosed	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

Part 7: Completion Time of Consultations on Cabinet Confidences

7.1 Requests with Legal Services

Number of Days	Fewer Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

7.2 Requests with Privy Council Office

Number of Days	Fewer Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

Part 8: Complaints and Investigations Notices Received

Section 31	Section 33	Section 35	Court action	Total
6			0	6

Part 9: Privacy Impact Assessments (PIAs)

Number of PIA(s) completed	1
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Part 10: Resources Related to the Privacy Act**10.1 Costs**

Expenditures		Amount
Salaries		\$67,891
Overtime		\$0
Goods and Services		\$4,096
• Professional services contracts	\$0	
• Other	\$4,096	
Total		\$71,987

10.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0.84
Part-time and casual employees	0.00
Regional staff	0.00
Consultants and agency personnel	0.00
Students	0.00
Total	0.84

Note: Enter values to two decimal places.

Appendix B

Industry Canada / Industrie Canada

Access to Information Act and Privacy Act Delegation Order

Arrêté sur la délégation en vertu de la *Loi sur l'accès à l'information* et de la *Loi sur la protection des renseignements personnels*

The Minister of Industry Canada, pursuant to section 73 of the *Access to Information Act* and the *Privacy Act*, hereby designates the persons holding the positions set out in the schedule hereto, or the persons occupying on an acting basis those positions, to exercise the powers and functions of the Minister as the head of a government institution, under the section of the Acts set out in the schedule opposite each position. This Delegation Order supersedes all previous Delegation Orders

En vertu de l'article 73 de la *Loi sur l'accès à l'information* et la *Loi sur la protection des renseignements personnels*, le Ministre d'Industrie Canada délègue aux titulaires des postes mentionnés à l'annexe ci-après, ainsi qu'aux personnes occupant à titre intérimaire les-dits postes, les attributions dont il est, en qualité de responsable d'une institution fédérale, investie par les articles des lois mentionnées en regard de chaque poste. Le présent décret de délégation remplace et annule tout décret antérieur

Schedule / Annexe

<u>Position / Poste</u>	<i>Access to information Act and Regulations / Loi sur l'accès à l'information et règlements</i>	<i>Privacy Act and Regulations / Loi sur la protection des renseignements personnels et règlements</i>
Corporate Secretary / Secrétaire général	Full authority / Autorité absolue	Full authority / Autorité absolue
Director, Information and Privacy Rights Administration (IPRA) / Directeur (trice), Administration des droits à l'information et à la protection des renseignements personnels (ADIPRP)	Full authority / Autorité absolue	Full authority / Autorité absolue

Manager, IPRA /
Gestionnaire, ADIPRP

Full authority / Autorité
absolue

Full authority / Autorité
absolue

And / et

Senior Advisor IPRA /
Conseiller (ère) principal(e),
ADIPRP

Section / Articles: 7, 8(1), 9,
11(4)(5), 13, 14, 15, 16, 17,
18, 19, 20, 21, 22, 23, 24, 25,
26, 27(1), 68, 69

Section / Articles : 8(1), 14,
15, 19, 20, 21, 22, 23, 24, 25,
26, 27, 28, 69, 70

Dated, at the City of Ottawa
this *25* day of *NOVEMBER*, 2014

Date, en la ville d'Ottawa
ce *25* jour de *NOVEMBRE* 2014

THE HONOURABLE JAMES MOORE
MINISTER OF INDUSTRY CANADA



MINISTRE D'INDUSTRIE CANADA
L'HONORABLE JAMES MOORE