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Canadian Grain Commission
2024-25
Annual Report to Parliament
Access to Information Act

Canada

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Annual Report to Parliament on the *Access to Information Act*

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1. Introduction

The Canadian Grain Commission (CGC) presents to Parliament its *Annual Report on the Administration of the Access to Information Act (*the "Act") for fiscal year 2024-25 (April 1, 2024 to March 31, 2025). This report is prepared and tabled in accordance with section 94 of the Act.

The Act gives Canadian citizens, permanent residents and any person or corporation present in Canada a right to access records of government institutions that are subject to the Act. The Act maintains that government information should be made available to the public, necessary exceptions to the right of access should be limited and specific, and decisions on the disclosure of government information should be reviewed independently of government.

In accordance with the Treasury Board of Canada Secretariat (TBS) requirements, this report provides an overview of the activities of the CGC in administering its responsibilities under the Act. The CGC does not have any non-operational ("paper") subsidiaries, consequently, this report does not include reporting obligations for such entities. This report should be considered along with the CGC's 2024-25 *Annual Report to Parliament on the Administration of the Privacy Act*, which is tabled separately.

The CGC is a federal government department, which administers the provisions of the *Canada Grain Act* (CGA). The CGC's mandate, as set out in the CGA, is to, "in the interests of producers, establish and maintain standards of quality for Canadian grain and regulate grain handling in Canada, to ensure that grain is a dependable commodity for domestic and export markets".

The CGC's Core Responsibility is Grain Regulation, or, to regulate grain handling in Canada and to establish and maintain science-based standards for Canadian grain. The CGC regulates the handling of 21 grains grown in Canada to protect producer rights and ensure the integrity of grain transactions.

The Departmental Results of this Core Responsibility are that domestic and international markets regard Canadian grain as dependable and safe and that farmers are fairly compensated for their grain. The CGC supports its Core Responsibility through its programs: Grain Quality, Grain Research, and Safeguards for Grain Farmers.

2. Access to Information and Privacy Office structure

The CGC is supported by Agriculture and Agri-Food Canada's (AAFC) Access to Information and Privacy (ATIP) office who assists in processing and responding to access to information and privacy requests received by the CGC.

The CGC's Chief Operating Officer is responsible for the coordination and implementation of policies, guidelines, and procedures to ensure compliance with the *Access to Information Act* and the *Privacy Act*.

The CGC has an ATIP Coordinator whose key responsibilities include:

- Ensuring timely processing of all ATIP requests and coordinating with AAFC's ATIP office for processing the CGC's ATIP requests;
- Providing senior management and all departmental staff with advice and guidance on ATIP-related matters;
- Responding to and managing privacy breaches and inquiries;
- Proactively disclosing summaries of closed access requests on the CGC website;
- Preparing annual reports to Parliament and maintaining the CGC Info Source chapter; and
- Developing and updating Personal Information Banks (PIBs).

For a breakdown of the group(s) and/or position(s) responsible for meeting each applicable proactive publication requirement under Part 2 of the *Access to Information Act*, see the section "Proactive Publication under Part 2 of the ATIA", below.

3. Delegation of authority

The Chief Commissioner of the CGC is responsible for responding to requests made under the Act. Subsection 95(1) of the Act provides for the delegation of the powers, duties and functions designated by the Act.

The Chief Operating Officer of the CGC heads CGC operations and reports to the Chief Commissioner. This position has full delegated authority of the powers, duties and functions designated by the Act.

The delegation of authority instrument for the administration of the Act is appended hereto as Annexes A and B.

4. Performance under Part 1 of the Access to Information Act, 2024–25

During the 2024-25 reporting period, the CGC processed four requests for information under the Act.

Number of access to information (ATI) requests

Year	Outstanding	Received	Completed	Carried Forward
2020-2021	0	6	6	0
2021-2022	0	1	1	0
2022-2023	0	2	2	0
2023-2024	0	2	2	0
2024-2025	0	4	3	1

Access requests received and completed

- The CGC received four new requests for information under the Act, one of which was carried forward into the next reporting period.
- Of the completed requests, 3,252 pages of the 4,238 pages reviewed were released.

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Exemptions or exclusions invoked

- The CGC invoked exemptions for 16(1)(c), 16(2)(c), 19(1), 20(1)(b), 21(1)(b), 21(1)(c) and 23.
- The CGC did not invoke any exclusions during the reporting period.

Processing time for requests and extensions

- During the reporting period, the CGC completed three requests for information:
  - one request was completed within 31-60 days;
  - two were completed within 61 to 120 days.
- The Act allows extensions beyond the 30-day statutory time frame for specific reasons. The CGC required extensions due to the volume of relevant records requiring review and to undertake consultations with third parties.

Informal requests

- The CGC also responds to informal requests for information from the public. Informal requests are generally requests for previously released records under a formal access request.
- There were 11 informal requests received during this reporting period.

Consultations

- The CGC must also respond to consultations pursuant to the Act from other government institutions to provide those institutions with recommendations regarding the release of information related to the CGC.
- During the reporting period, the CGC received two consultation requests from other government institutions.

Number of Pages to Review for Consultations

- The number of pages reviewed by the CGC for other institutions totaled 111.

Year	Outstanding	Received	Completed	Carried Forward
2020-2021	0	14 (28 pages)	14	0
2021-2022	0	12 (48 pages)	12	0
2022-2023	0	9 (59 pages)	9	0
2023-2024	0	0	0	0
2024-2025	0	2 (111 pages)	2	0

Summary

Overall, the CGC received 17 requests during the reporting period. This includes four requests for information, 11 informal requests, and two requests to review pages for other institutions. All completed requests were “disclosed in part”.

The CGC received significantly more requests in this reporting period compared to the previous reporting period (17 total requests were received in 2024-25 compared to three requests in 2023-24).

In compliance with TBS requirements, summaries of the CGC’s completed ATI requests can be found on the Government of Canada’s Open Government website.

5. ATIP training and education

The CGC continues to raise awareness about information and records management practices and procedures within the organization. During the reporting period, formal ATIP training was not provided to CGC employees. The ATIP coordinator is up to date on training requirements and takes part in TBS educational sessions as they become available.

6. Policies, guidelines, procedures and engagement

The CGC did not implement any new or revise any existing access to information policies, guidelines, or procedures during the 2024-25 reporting period.

The CGC was not party to any service agreements under section 96 of the Act during the 2024-25 reporting period.

7. Proactive Publication under Part 2 of the ATIA

The CGC is subject to Part 2 of the Act and is responsible for meeting several proactive publication requirements and ensuring that the applicable requirements are met within the legislative timeline identified in the Act. The CGC has procedures and systems in place to identify and track records that are required to be proactively disclosed. For example, the CGC proactively publishes information on contracts over $10,000, briefing note titles, reclassifications of positions, and travel and hospitality. Information is posted to the CGC’s Transparency web page.

In the 2024-25 reporting period, 100% of CGC records that were subject to proactive publications requirements were disclosed. 93% of the CGC’s proactive publication requirements were disclosed within legislated timelines. 7% of the CGC’s proactive publication requirements were disclosed outside of legislated timelines (mainly due to staff turnover and resource limitations).

Proactive Publication Requirements

The following table shows the 2024-25 results associated with the CGC's proactive disclosure requirements.

Legislative Requirement	Section of ATIA	Publication Timeline	Does requirement apply to your institution? (Y/N)	Internal group(s) or positions(s) responsible for fulfilling requirement	% of proactive publication requirements published within legislated timelines	Link to web page where published
Apply to all Government Institutions as defined in section 3 of the *Access to Information Act*						
Travel Expenses	82	Within 30 days after the end of the month of reimbursement	Y	Finance Division	91%	Transparency
Hospitality Expenses	83	Within 30 days after the end of the month of reimbursement	Y	Finance Division	100%	Transparency
Reports tabled in Parliament	84	Within 30 days after tabling	Y	Innovation and Strategy Division	100%	Transparency
Apply to government entities or Departments, agencies, and other bodies subject to the Act and listed in Schedules I, I.1, or II of the *Financial Administration Act*						
Contracts over $10,000	86	Q1-3: Within 30 days after the quarter Q4: Within 60 days after the quarter	Y	Finance Division	91%	Transparency
Grants & Contributions over $25,000	87	Within 30 days after the quarter	Y	Finance Division	NIL – no agreements in place	Transparency

Legislative Requirement	Section of ATIA	Publication Timeline	Does requirement apply to your institution? (Y/N)	Internal group(s) or positions(s) responsible for fulfilling requirement	% of proactive publication requirements published within legislated timelines	Link to web page where published
Packages of briefing materials prepared for new or incoming deputy heads or equivalent	88(a)	Within 120 days after appointment	Y	EA to Chief Commissioner	100%	Transparency
Titles and reference numbers of memoranda prepared for a deputy head or equivalent, that is received by their office	88(b)	Within 30 days after the end of the month received	Y	EA to Chief Commissioner	100%	Transparency
Packages of briefing materials prepared for a deputy head or equivalent's appearance before a committee of Parliament	88(c)	Within 120 days after appearance	Y	EA to Chief Commissioner	NIL – no packages prepared	Transparency
Applies to government institutions that are departments named in Schedule I to the *Financial Administration Act* or portions of the core public administration named in Schedule IV to that Act (i.e. government institutions for which Treasury Board is the employer)						

Legislative Requirement	Section of ATIA	Publication Timeline	Does requirement apply to your institution? (Y/N)	Internal group(s) or positions(s) responsible for fulfilling requirement	% of proactive publication requirements published within legislated timelines	Link to web page where published
Reclassification of positions	85	Within 30 days after the quarter	Y	Human Resources Division	60%	Transparency
Apply to Ministers' Offices (therefore apply to any institution that performs proactive publication on behalf of a Minister's Office)						
Packages of briefing materials prepared by a government institution for new or incoming ministers	74(a)	Within 120 days after appointment	N			
Titles and reference numbers of memoranda prepared by a government institution for the minister, that is received by their office	74(b)	Within 30 days after the end of the month received	N			
Package of question period notes prepared by a government institution for the minister and in use on the last	74(c)	Within 30 days after last sitting day of the House of Common in June and December	N			

Legislative Requirement	Section of ATIA	Publication Timeline	Does requirement apply to your institution? (Y/N)	Internal group(s) or positions(s) responsible for fulfilling requirement	% of proactive publication requirements published within legislated timelines	Link to web page where published
sitting day of the House of Commons in June and December						
Packages of briefing materials prepared by a government institution for a minister's appearance before a committee of Parliament	74(d)	Within 120 days after appearance	N			
Travel Expenses	75	Within 30 days after the end of the month of reimbursement	N			
Hospitality Expenses	76	Within 30 days after the end of the month of reimbursement	N			
Contracts over $10,000	77	Q1-3: Within 30 days after the quarter	N			

Legislative Requirement	Section of ATIA	Publication Timeline	Does requirement apply to your institution? (Y/N)	Internal group(s) or positions(s) responsible for fulfilling requirement	% of proactive publication requirements published within legislated timelines	Link to web page where published
		Q4: Within 60 days after the quarter				
Ministers' Offices Expenses Note: This consolidated report is currently published by TBS on behalf of all institutions.	78	Within 120 days after the fiscal year	N			

8. Initiatives and Projects to Improve Access to Information

Requests received by the CGC under the Act are monitored by AAFC's ATIP office using an automated system. The workflow case management tool used by AAFC tracks all actions and due dates, stores relevant records requiring review, maintains audit logs, promotes the use of standard templates, allows extensive search capability to facilitate analysis and generates progress and statistical reports. The CGC continues to assess and streamline processes to improve access to information.

9. Access complaints, investigations and audits

The Act provides a system of review to help ensure federal institutions comply with their obligations. Under this system of review, a requester may file a complaint with the Information Commissioner of Canada, who will investigate the matter on behalf of the requester. After the complaint investigation is carried out, the Commissioner issues a finding on the matter and determines whether an institution handled the request properly.

The CGC received no complaints during the reporting period.

No audits in relation to the CGC's obligations under the Act were carried out during the reporting period.

10. Monitoring timelines

Requests received under the Act by the CGC are monitored by AAFC's ATIP office using an automated system to ensure the timely processing of ATIP requests.

The CGC's ATIP Coordinator monitors the time to process access to information requests by completing an internal tracking log spreadsheet, which is updated to reflect key dates and activities for all requests including deadlines. Senior management is kept apprised of the access to information activities, as required.

CGC staff responsible for proactive publication requirements under the Act monitor the accuracy and completeness with internal procedures and tracking documents.

11. Closing

In summary, the CGC received 17 requests under Part 1 of the Act during the reporting period. This includes four requests for information, 11 informal requests, and two requests to review pages for other institutions. This compares with three requests in 2023-24. All processed requests were completed within legislated deadlines. The CGC is fully committed to both the spirit and the intent of the Act to ensure openness and transparency within the CGC and with the Canadian public.

Annex A – *Access to Information Act* Delegation Order - Canadian Grain Commission

***Access to Information Act* Delegation Order - Canadian Grain Commission**

The Chief Commissioner of the Canadian Grain Commission, pursuant to section 95(1) of the *Access to Information Act*, hereby delegates the persons of the CGC holding the positions set out in the schedule hereto, or the persons occupying on an acting basis those positions, to exercise the powers and perform the duties and functions of the Chief Commissioner as the head of a government institution under the sections of the Act as set out in the schedule opposite each position. This Delegation Order supersedes all previous orders.

David Hunt
Chief Commissioner

Signed on: September 10, 2025

Annex B – Delegation of authority instrument for the administration of the *Access to Information Act*

Sections of the *Access to Information Act*

Sections	Powers, Duties or Functions	Chief Operating Officer
4(2.1)	Responsibility of government institutions	X
7(a)	To notify applicant and to give access to the record	X
7(b)	Giving access to records	X
8(1)	To transfer to another institution or to accept transfer from another institution	X
9	To extend time limits	X
11(2)	Waiver of fee	X
12(2)b)	To have record translated in the public interest	X
12(3)(b)	To have record made accessible in alternative format	X
13	To exempt information obtained in confidence	X
13(2)	To disclose with consent of the other government	X
14	To exempt information re: federal – provincial affairs	X
15	To exempt information re: international affairs and defence	X
16	To exempt information re: law enforcement and investigations	X
16.5	To exempt information re: Public Servant Disclosure Protection Act	X
17	To exempt information re: safety of individuals	X
18	To exempt information re: economic interests of Canada	X
19	To exempt personal information	X
20	To exempt third party information	X
21	To exempt information re: advice and recommendations	X
22	To exempt information re: testing procedures, tests and audits	X
22.1	To exempt information re: Audit working papers and draft audit reports	X
23	To exempt information re: solicitor client privilege	X
24	To exempt information re: statutory prohibitions	X
25	To sever exempt information from records and to disclose the remaining information	X
26	To Refuse access when information is published	X
27(1)	To notify third party of intent to disclose	X
27(4)	To extend time limit for third party notification process	X
28(1)(b)	Review representations of third parties	X
28(2)	To waive the requirement of third parties providing representation in writing	X
28(4)	To notify third party of decision	X
33	To advise Information Commissioner of third-party Involvement	X
35(2)(b)	To have the right to make representations to Information Commissioner	X

Sections	Powers, Duties or Functions	Chief Operating Officer
37(4)	To provide access to complainant pursuant to Information Commissioner's recommendation	X
43(2)	To provide notification to third party (application to Federal Court for review)	X
44(2)	To notify applicant that third party has applied for Court review	X
52(2)(b), (3)	Special rules for hearing	X
94	To prepare annual report to Parliament	X
Legend: X = has delegated authority		

Sections of the *Access to Information Regulations*

Sections	Powers, Duties or Functions	Chief Operating Officer
6(1)	Transfer of request	X
7(2)	Search and preparation fees	X
7(3)	Production and programming fees	X
8	Providing access to record(s)	X
8.1	Limitation in respect of format	X
Legend: X = Has delegated authority		