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Canadian Grain Commission
2024-25
Annual Report to Parliament
Privacy Act

Canada

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Privacy Act

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1. Introduction

The Canadian Grain Commission (CGC) presents to Parliament its *Annual Report on the Administration of the Privacy 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 72 of the Act.

The purpose of the Act is to 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.

In accordance with Treasury Board of Canada Secretariat (TBS) requirements, this report provides an overview of the CGC’s activities 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 CGC’s 2024-25 *Annual Report to Parliament on the Administration of the Access to Information 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 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'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).

During the 2024-25 reporting period the CGC was not party to any service agreements under section 73.1 of the Act.

3. Delegation of authority

The Chief Commissioner of the CGC is responsible for responding to requests made under the Act. Section 73(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 leads 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 2024-25

Privacy requests received and completed

- The ATIP office received four new requests under the Act in 2024-25. This compares with zero new requests in 2023-24.

Number of privacy requests

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

Exemptions or exclusions invoked

- During the reporting period, the CGC invoked three exemptions under section 26 (personal information about individuals other than the requester).
- No exclusions were invoked during the reporting period.

Extensions

- The Act allows extensions beyond the 30-day statutory time frame for specific reasons, such as the volume of relevant records associated with a request or required consultations with other government departments.
- During the reporting period, there was one time extension required because of difficulties accessing the records.

Consultations

- The CGC must respond to consultations pursuant to the Act from other government institutions in order to provide those institutions with recommendations regarding the release of information of interest to CGC.
- No privacy consultation requests were received from other institutions during the reporting period.

Requests for correction of personal information and notations

- No requests were received from individuals seeking a correction or notation to their personal information pursuant to subsection 12(2) of the Act.

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 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. Privacy polices, guidelines, and procedures

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

7. Initiatives and Projects to Improve Privacy

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 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.

8. Privacy complaints, investigations and audits

No complaints were received in relation to CGC obligations under the Act. No investigations or audits were carried out.

9. Material privacy breaches

In May 2014, TBS launched the updated *Guidelines for Privacy Breaches* based on changes made to the *Directive on Privacy Practices*. The updated guidelines and directive establish a mandatory requirement for departments to report all material privacy breaches to the Office of the Privacy Commissioner and TBS. In accordance with the Guidelines, a breach is defined as "material" if the breach "involves sensitive personal information and could reasonably be expected to cause serious injury or harm to the individual and/or involves a large number of affected individuals."

There were no material privacy breaches reported by CGC during fiscal year 2024-25.

10. Privacy impact assessments

Privacy impact assessments (PIAs) are used to determine whether privacy risks may be present in new or existing CGC programs or initiatives that manage personal information for administrative purposes.

The CGC did not complete any PIAs during the reporting period.

11. Public Interest Disclosures

Paragraph 8(2)(m) of the Act allows for the disclosure of personal information without the consent of the individual in specific circumstances. During the reporting period, no such disclosures were made under that paragraph.

12. 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 privacy requests.

The CGC's ATIP Coordinator monitors the time to process privacy 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 privacy activities on a strict need-to-know basis.

13. Closing

In summary, the CGC received four privacy requests during the 2024-25 fiscal year. All requests received were closed during the reporting period. The CGC is fully committed to both the spirit and the intent of the Act. The CGC will continue to work proactively to protect the personal information of its employees and the Canadian public that is under its control.

Annex A – *Privacy Act* Delegation Order - Canadian Grain Commission

Privacy Act Delegation Order - Canadian Grain Commission

The Chief Commissioner of the Canadian Grain Commission (CGC), pursuant to section 73(1) of the *Privacy 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 *Privacy Act*

Sections of the *Privacy Act*

Sections	Powers, Duties or Functions	Chief Operating Officer
8(2)(j)	To disclose personal information for research of statistical purposes	X
8(2)(m)	To disclose personal information in the public interest or to benefit an individual	X
8(4)	To maintain records of requests from investigative bodies	X
8(5)	To notify Privacy Commissioner of disclosures in the public interest	X
9(1)	To maintain record of any use not included in InfoSource and attach to the personal information involved	X
9(4)	To notify Privacy Commissioner of consistent use of personal information and update index	X
10	To include personal information in personal information banks	X
14	To notify applicant and to give access to the record	X
15	To extend time limit and notify applicant	X
17(2)(b)	To determine the necessity for translation or interpretation of record	X
17(3)(b)	Access to personal information in alternative format	X
18(2)	To refuse to disclose information contained in an exempt bank	X
19(1)	To exempt personal information obtained in confidence from another government	X
19(2)	To disclose with consent of the other government	X
20	To exempt personal information re: federal-provincial affairs	X
21	To exempt information re: international affairs and defence	X
22	To exempt information re: law enforcement and investigation	X
22.3	To exempt information re: Public Services Disclosure Protection Act	X
23	To exempt information re: security clearances	X
24	To exempt personal information re: individuals sentenced for an offense	X
25	To exempt personal information re: safety of individuals	X
26	To exempt personal information about another individual	X

Sections	Powers, Duties or Functions	Chief Operating Officer
27	To exempt personal information re: solicitor-client privilege	X
28	To exempt personal information re: medical records	X
31	Notice of intention to investigate	X
33(2)	To make representations to the Privacy Commissioner during an investigation	X
35(1)	To respond to Privacy Commissioner's recommendations	X
35(4)	To provide access to applicant pursuant to Privacy Commissioner's recommendation	X
36(3)	To receive Privacy Commissioner's report of finding of investigation of exempt bank	X
37(3)	To receive report of Privacy Commissioner's finding after compliance investigation	X
51(2)(b)	To request that Section 51 hearing be held in the National Capital Region	X
51(3)	To request and be given right to make representations in Section 51 hearing	X
72(1)	To prepare annual report to Parliament	X
Legend: X = has delegated authority		

Sections of the *Privacy Regulations*

Sections	Powers, Duties or Functions	Chief Operating Officer
9	Reasonable facilities and time provided to examine personal information	X
11(2)	Notification that correction to personal information has been made	X
11(4)	Notification that correction to personal information has been refused	X
13(1)	Disclosure of personal information relating to physical or mental health may be disclosed to a duly qualified medical practitioner or psychologist in order to provide an opinion as to whether disclosure of the information would be contrary to the best interests of the individual	X
14	Disclosure of personal information relating to physical or mental health may be made to a requestor in the presence of a qualified medical practitioner or psychologist	X
Legend: X = Has delegated authority		