Financial Transactions and Reports Analysis Centre of Canada

Centre d'analyse des opérations et déclarations financières du Canada

FINTRAC

2025–26 Annual Report on the Administration of the *Access to Information Act*

September 1, 2026



Safe Canadians, Secure Economy

Canada

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1. Introduction

This Report to Parliament, which is prepared and tabled in accordance with Section 94 of the *Access to Information Act*, describes the activities of the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC) in administering this Act during fiscal year 2025–26. This report should be considered along with FINTRAC's 2025–26 *Annual Report on the Administration of the Privacy Act*, which is tabled separately.

The purpose of the *Access to Information Act* (hereafter the "Act") is to provide a right of access to information held by government institutions. It does so in accordance with three principles: information should be 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. FINTRAC is not reporting on behalf of wholly owned subsidiaries or non-operational institutions.

2. About FINTRAC

FINTRAC is Canada's financial intelligence unit and anti-money laundering and anti-terrorist financing supervisor and plays a critical role in combatting money laundering, terrorist activity financing, sanctions evasion and threats to the security of Canada. The Centre has two core responsibilities framed around a duty to protect the personal information with which it is entrusted.

First, FINTRAC is responsible for ensuring compliance with Part 1 and 1.1 of the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* and its associated Regulations. This legal framework establishes obligations for specified businesses to develop a compliance regime in order to identify clients, monitor business relationships, keep records, and report certain types of financial transactions to FINTRAC. These obligations allow for certain economic activities to be more transparent, which helps prevent and deter nefarious individuals and organizations from using Canada's legitimate economy to launder the proceeds of their crimes, finance terrorist activities and/or evade sanctions. FINTRAC is committed to working with businesses to help them understand and comply with their obligations. The Centre also takes firm action when it is required to ensure that businesses take their responsibilities seriously. This includes undertaking compliance enforcement action such as follow-up examinations, the development and monitoring of action plans imposed on businesses, the levying of administrative monetary penalties, and the provision of non-compliance disclosures to law enforcement. The Centre also maintains a registry of Canadian-based money services businesses and foreign money services businesses that direct and provide services to persons and entities in Canada.

Second, FINTRAC generates actionable financial intelligence that assists Canada's law enforcement, national security agencies, and international partners in combatting money laundering, terrorism financing, sanctions evasion and threats to the security of Canada. In addition, the Centre produces strategic financial intelligence for federal policy and decision-makers, the security and intelligence community, businesses across the country, international partners and other stakeholders. FINTRAC's strategic intelligence provides a wide analytic perspective on the nature, scope and threat posed by money laundering, terrorism financing and sanctions evasion.

3. The Access to Information and Privacy Office

FINTRAC's Access to Information and Privacy (ATIP) Office is responsible for leading, coordinating and undertaking the Centre's access to information and privacy responsibilities. The ATIP Office is part of FINTRAC's Communications Group and led by the Executive Communications Lead, who reports directly to FINTRAC's Director and Chief Executive Officer. The Executive Communications Lead, who is also the Centre's Chief Privacy Officer, is responsible for the overall management of all access to information and privacy matters within FINTRAC.

FINTRAC's ATIP Office consists of an ATIP Coordinator and two Senior ATIP Advisors. Key responsibilities of the ATIP Office include:

- developing and implementing policies, procedures and guidelines to ensure FINTRAC's compliance with the Act and the *Privacy Act*;
- ensuring the timely processing of access to information and privacy requests, and meeting proactive disclosure obligations;
- providing advice, guidance and awareness activities to FINTRAC employees, contractors and students on ATIP-related matters;
- representing FINTRAC in its discussions and negotiations with external stakeholders, including other government departments, third parties, the Treasury Board of Canada Secretariat, the Office of the Information Commissioner, the Office of the Privacy Commissioner and the general public;
- maintaining Personal Information Banks and conducting privacy impact assessments; and
- preparing annual reports on the administration of the Act and the *Privacy Act* for Parliament and publishing FINTRAC's Info Source Chapter.

To support the ATIP Office in meeting its legislative obligations, FINTRAC has established a collaborative network comprised of representatives from all sectors and relevant units within the Centre. These representatives are responsible for coordinating requests, providing guidance on the Act within their work units and liaising with the ATIP Office on all ATIP-related matters. For a breakdown of the units responsible for meeting each applicable proactive publication requirement under Part 2 of the *Access to Information Act*, see section 9, "Proactive publication".

FINTRAC is not party to any service agreements under section 96 of the Act.

4. Delegation of authority

Order in Council P.C. 2000-1066 designates the Director and Chief Executive Officer of the Centre as head of FINTRAC for the purposes of administering the Act and FINTRAC's privacy program. Pursuant to Section 73 of the Act, FINTRAC's Director and Chief Executive Officer delegated the authority to exercise the powers, functions and duties under the Act to FINTRAC's Executive Communications Lead and its ATIP Coordinator. These functions have full-delegated authority

under the Act and the *Privacy Act*, in accordance with the delegation of authority instrument approved by the Director and Chief Executive Officer in March 2023.

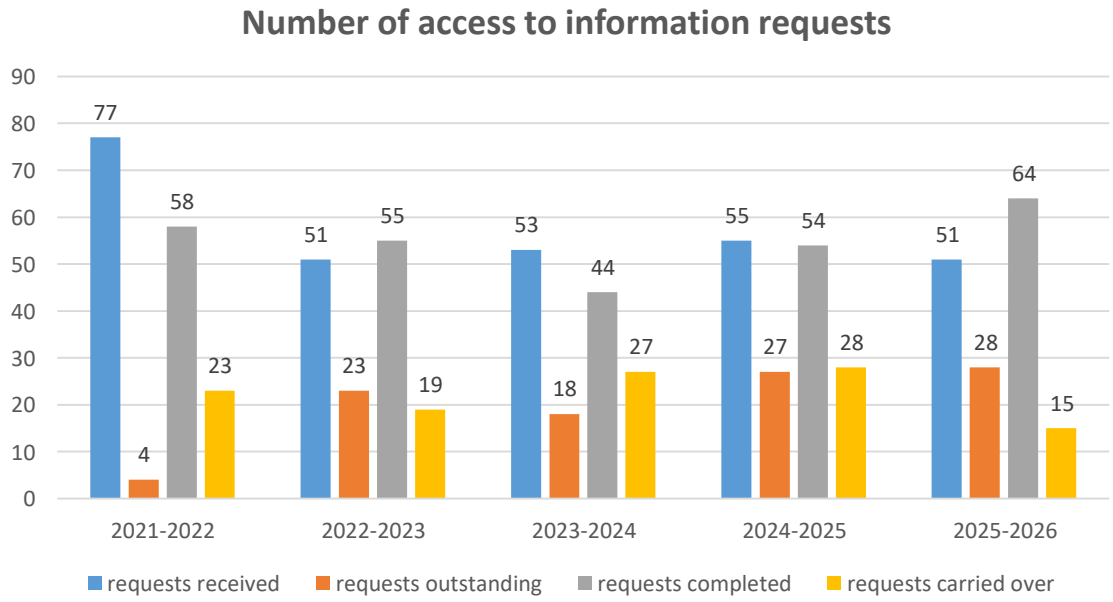
A copy of the Director and Chief Executive Officer's Delegation Order is available at Annex A.

5. Statistical overview and accomplishments

Performance of access request case activity

During the reporting period of April 1, 2025 to March 31, 2026, there was a 7% decrease in the number of access requests received by FINTRAC (51) as compared to the previous year (55). FINTRAC also managed 28 requests that were outstanding from a previous year, bringing the total caseload to 79. Of these, FINTRAC closed 64 requests in 2025–26:

- 10 requests were completed in 1-15 days
- 18 requests were completed in 16-30 days
- 6 requests were completed in 31-60 days
- 8 requests were completed in 61-120 days
- 8 requests were completed in 121-180 days
- 1 request was completed in 181-365 days
- 13 requests were completed in more than 365 days



Of the 79 requests active during 2025–26, 15 were carried over to 2026–27. Of those, 9 were carried over within the legislated timeline. Of the remaining 6 that were carried over beyond legislated timelines, 1 request was received in 2025–26 and 5 were carried over from previous fiscal years and are delayed due to unfinished consultations.

In 2025–26, FINTRAC’s on-time response rate decreased to 81% from 87% in the previous reporting year. The Centre’s on-time response rate is once again well above the federal government's overall average response rate of 65% in 2024–25. FINTRAC’s response to many requests required the intensive review of complex records, including extensive internal and external consultations.

Disposition of completed access requests

FINTRAC completed 64 access to information requests in 2025–26:

- In 5 cases, representing 8% of the overall cases, the applicant received full disclosure of the information requested (22 pages).
- In 29 cases, representing 45% of the overall cases, the applicants received a partial disclosure of the information requested (a combined 31,227 pages).
- In 2 cases, representing 3% of the overall cases, the applicant received a response that the information requested was fully withheld from disclosure.
- In 3 cases, representing 5% of the overall cases, it was determined that no responsive records existed.
- In 7 cases, representing 11% of the overall cases, FINTRAC responded that it was unable to acknowledge the existence of information.
- In 18 cases, representing 28% of the overall cases, the applicants abandoned their requests.

Completion times and extensions of access requests

The Act allows extensions beyond the 30-day statutory period for specific reasons. Of the 64 completed requests during the reporting period, 52 were finalized within the established deadline (the 30-day statutory or an extended deadline pursuant to Section 9 of the Act). Due to delays resulting from internal and/or external consultations, as well as operational pressures, 12 requests were completed after their established deadline.

In 2025–26, FINTRAC required an extension to the original 30-day statutory deadline in 14 instances. The following is a breakdown of these cases:

- Paragraph 9(1)(a) was invoked 7 times to overcome workload pressures and operational constraints.
- Paragraph 9(1)(b) was invoked 5 times to complete consultations with other government institutions.
- Paragraph 9(1)(a) and (b) were invoked 21 times to overcome workload pressures and to complete consultations with other government institutions.
- Paragraph 9(1)(a) and (c) were invoked 1 time to overcome workload pressures and to complete consultations with a third party.

Consultations under the Act

Consultations undertaken between institutions are an essential part of processing requests under the Act. They afford institutions that have an interest in the records proposed for disclosure with

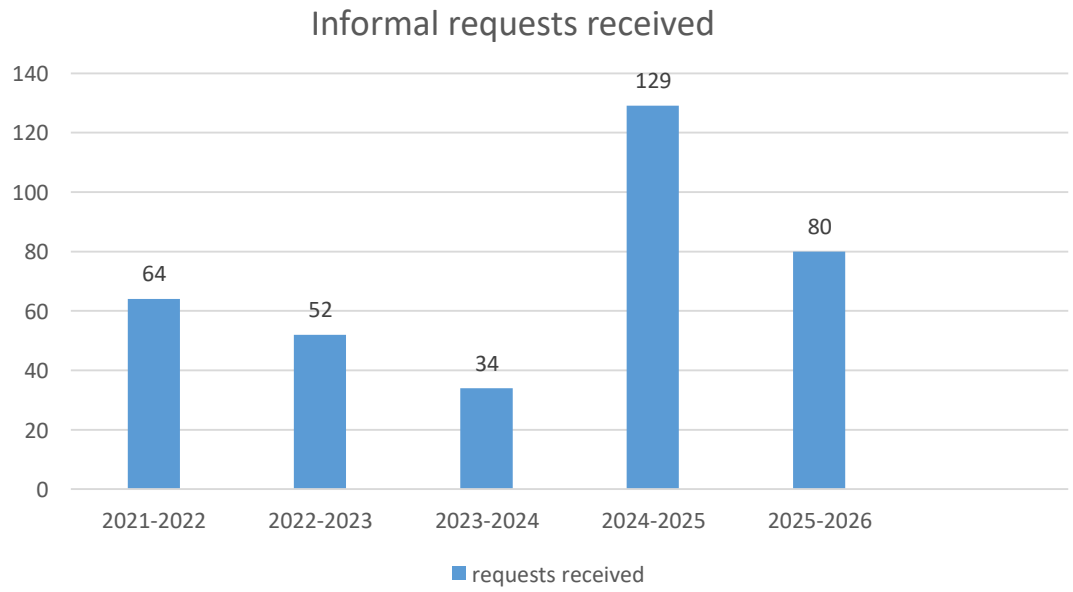
an opportunity to make recommendations to the processing institution. For this reporting period, FINTRAC completed 29 consultation requests received from other Government of Canada institutions.

Complaints and investigations of access requests

Subsection 30(1) of the Act describes how the Office of the Information Commissioner receives and investigates complaints from individuals regarding the processing of requests under the Act. During 2025–26, FINTRAC received 3 new access to information complaints to manage alongside 14 others that were outstanding from previous years. Of the 17 active complaints, FINTRAC worked closely with the Office of the Information Commissioner, provided representations in a timely manner, and resolved 14, the majority of which were discontinued or not well-founded. At the close of 2025–26, FINTRAC continued to manage 3 complaints under the Act, 1 of which was received within the reporting period and the remaining 2 were received in 2024–25. All 3 active complaints are in respect to information FINTRAC withheld from release under the Act.

Informal requests

In 2025–26, FINTRAC received 80 informal requests for copies of records released in previously processed requests, all of which were responded to within the reporting year. The following chart shows the number of informal requests received by FINTRAC over the past five years.



6. ATIP awareness and education

Information protection is integral to FINTRAC's mandate. As such, the Centre requires its employees (including students and contractors) to have a heightened awareness of security, privacy, information management and access to information. The FINTRAC *Code of Conduct,*

Values and Ethics specifically describes employees' legal obligations to protect information under the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* and makes reference to the *Privacy Act*, the *Canadian Charter of Rights and Freedoms*, the *Access to Information Act*, and the Centre's privacy, security and information management policies. Adherence to the *Code of Conduct, Values and Ethics* is a condition of employment for every FINTRAC employee.

The following training and awareness activities took place during the reporting period:

- The ATIP Office published monthly information notices regarding access to information and privacy protection on FINTRAC's intranet site.
- The ATIP Office raised awareness by providing day-to-day coaching and targeted information sessions to ATIP representatives across the Centre. In 2025–26, 5 training sessions were delivered to 9 employees. This focused training fosters a spirit of collaboration and has been essential to the success of FINTRAC's broader ATIP program.
- The ATIP Office provides training and awareness sessions to employees tailored to the needs of specific operational groups. The ATIP Office delivered 3 access to information and privacy awareness sessions to 193 employees during the 2025–26 period.
- FINTRAC employees completed the following online learning courses at the Canada School of Public Service:
    - Access to Information and Privacy Fundamentals (32 employees)

Access to information and privacy protection messaging is also incorporated in mandatory Information Management awareness sessions and in New Employee Orientation Training.

7. New access to information-related policies and procedures

Responding to recommendations from the Office of the Information Commissioner, FINTRAC's ATIP Office enhanced its record retrieval process by requiring an attestation from all employees performing search activities to locate responsive records. The attestation serves to document the retrieval parameters undertaken and demonstrates that FINTRAC is meeting its reasonable search obligations under the Act.

8. Access to information program performance and monitoring

FINTRAC's automated case management system facilitates timely responses to requests, documents important actions and decisions, and monitors performance. The system also includes an audit log, has extensive search capabilities to enable analysis of previously processed information, and generates progress and statistical reports. FINTRAC uses the centralized platform ATIP Online Management Tool to receive requests under the Act and communicate with applicants.

FINTRAC is committed to transparency and to helping requesters gain access to readily available information whenever possible. The ATIP Office works closely with sector representatives on all aspects of requests, including ensuring that it is appropriately consulting with FINTRAC partners on information that may affect them if disclosed to the public.

The ATIP Office works with its operational colleagues to assess the implications of making more information available on the Open Government website, and how it can best accommodate frequent recurring requests for specific information. Of note, FINTRAC regularly receives and responds to requests for specific statistical details from its holdings of financial transaction reports. Such requests frequently require significant effort and review to produce data that is comprehensive enough to assist the requestor, while ensuring that the integrity and security of FINTRAC's financial intelligence is protected.

The ATIP Office provides updates to senior management within FINTRAC's corporate governance, as well as providing briefings on ATIP files to FINTRAC's Executive Committee.

9. Proactive publication

As per the Directive on Proactive Disclosure, FINTRAC has an established process in place to ensure the Centre meets all proactive publication requirements under Part 2 of the Act. The Directive sets out the roles and responsibilities for all proactive publishing obligations. The ATIP Office is responsible for ensuring and documenting FINTRAC's compliance with the Act's requirements.

The following table identifies the proactive disclosure requirements and 2025–26 performance of FINTRAC under Part 2 of the Act, Sections 82 to 88.

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	Yes	Finance and Administration	100	https://search.open.canada.ca/travel
Hospitality Expenses	83	Within 30 days after the end of the month of reimbursement	Yes	Finance and Administration	100	https://search.open.canada.ca/hospitality
Reports tabled in Parliament	84	Within 30 days after tabling	Yes	Communications / ATIP Office	100	https://search.open.canada.ca/open

						data/?collection=parliament_report
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	Yes	Finance and Administration	100	https://search.open.canada.ca/contracts
Grants & Contributions over $25,000	87	Within 30 days after the quarter	No	n/a	n/a	n/a
Packages of briefing materials prepared for new or incoming deputy heads or equivalent	88(a)	Within 120 days after appointment	Yes	Communications / ATIP Office	No instances	https://search.open.canada.ca/opendata/?collection=transition
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	Yes	Communications / ATIP Office	100	https://search.open.canada.ca/briefing_titles
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	Yes	Communications / ATIP Office	100	https://search.open.canada.ca/opendata/?collection=parliament_committee_deputy

10. Closing

FINTRAC remains fully committed to applying the spirit and intent of the Act to ensure openness, transparency and consistency when processing requests within its organization and when responding to the Canadian public.

ANNEX A

Financial Transactions and Reports Analysis Centre of Canada

Ottawa, Canada K1P 1H7

Centre d'analyse des opérations et déclarations financières du Canada

Ottawa, Canada K1P 1H7

DELEGATION ORDER
ARRÊTÉ DE DÉLÉGATION DE POUVOIRS

Access to Information Act and *Regulations*
Loi sur l'accès à l'information et règlements

Pursuant to Section 95 of the *Access to Information Act*, the Financial Transactions and Reports Analysis Centre of Canada's Director and Chief Executive Officer delegates the full authority to exercise the powers, functions and duties under the *Access to Information Act* to the Manager of Communications and Chief Privacy Officer, and to the Access to Information and Privacy Coordinator. This delegation order also applies to persons occupying any of these positions on an acting basis.

En vertu de l'article 95 de la *Loi sur l'accès à l'information*, la directrice et présidente-directrice générale du Centre d'analyse des opérations et déclarations financières du Canada délègue au gestionnaire des Communications et chef de la protection des renseignements personnels, et au coordonnateur de l'Accès à l'information et de la protection des renseignements personnels les pouvoirs et fonctions qui lui sont attribués par cette même loi. Le présent arrêté s'applique également aux personnes occupant les postes susmentionnés par intérim.

This designation takes effect as of March 31, 2023
La présente désignation entre en vigueur le 31 mars 2023

Paquet, Sarah

Digitally signed by: Paquet, Sarah
DN: CN = Paquet, Sarah C = CA O = GC
OU = FINTRAC-CANAFE
Date: 2023.03.29 17:53:09 -04'00'

Sarah Paquet
Director and Chief Executive Officer
Financial Transactions and Reports Analysis Centre of Canada
Directrice et présidente-directrice générale
Centre d'analyse des opérations et déclarations financières du Canada