

Access to Information 2024-2025

April 2024-March 2025



Contents

Ac	cess 1	to Information 2024-2025	1
1.	Intro	duction	3
	1.1	Canada Post's responsibility	3
	1.2	Canada Post and the Access to Information Act	4
2.	Orga	anizational Structure	5
	2.1	Governance	7
3.	Dele	gation Order	7
4.	Perf	ormance of the Access to Information Program in 2024-2025	7
	4.1	Volume of requests	9
	4.2	Sources	11
	4.3	Extensions	11
	4.4	Exemptions	12
	4.5	Consultations	13
	4.6	Complaints	14
5.	Trair	ning and awareness	15
6.	Polic	ies, guidelines and procedures	15
7.	Proa	ctive Publication Under Part 2 of the Act	16
8.	Initia	tives and projects to improve access to information	17
9.	Sum	mary of key issues and actions take on compliance	18
10.	Mon	itoring compliance	18
11.	Cond	clusion	19
Ар	pend	ix A – Delegation Order	.20
Ар	pend	ix C – Treasury Board of Canada Secretariat Statistical Report	. 26
Ар	pend	ix D – Supplemental Statistical Report on the Access to Information Act and	
Pri	vacy i	Act	.39

1. Introduction

The Access to Information Act (the Act) gives Canadian citizens, as well as corporations in Canada, the right to request access to records held by federal institutions including Crown corporations subject to the Act.

Canada Post Corporation (Canada Post or the Corporation) is pleased to submit to Parliament its Annual Report related to the administration of the Act, prepared in accordance with section 94 of the Act. Canada Post's financial year aligns with the calendar year and reporting is done annually. As required by the Treasury Board of Canada Secretariat, this report covers the period from April 1, 2024, to March 31, 2025.

1.1 Canada Post's responsibility

The Canada Post Group of Companies (the Group) consists of the core Canada Post segment and its non-wholly owned subsidiary Purolator Holdings Ltd. For part of 2024, the Group included subsidiaries SCI Group Inc. (up to March 1, 2024), and Innovapost Inc. (up to April 15, 2024).

In 2024, the Group employed more than 76,000 people (paid full-time and part-time employees, including temporary, casual and term employees), including over 62,300 in the Canada Post segment. The Group delivered approximately 6.6 billion pieces of mail, parcels and messages in 2024 to over 17.6 million addresses across Canada. The Canada Post segment operates the largest retail network in Canada, with over 5,700 post offices across the country. The Corporation has a mandate to conduct its operations on a self-sustaining financial basis, while providing a standard of service that meets the needs of the people of Canada.

In 2024, digital solutions continued to disrupt the company's Transaction Mail and Direct Marketing businesses. Canadians and Canadian businesses have witnessed an accelerated shift from peak mail volumes to digital commerce. Over the last two decades, Lettermail™ volumes have significantly declined. Canada Post delivered 70 per cent fewer pieces of mail per address in 2024 than in the peak mail year of 2006.

The parcel delivery industry has transformed over the past few years, resulting in increased competition on a global scale. Although the Canadian ecommerce market is expected to double over the next decade, Canada Post continues to struggle to retain or gain market share. Several constraints are restricting the company's success in the ecommerce market and adversely affecting Canada Post's overall performance. These constraints include limitations and inflexibility imposed by our collective agreements, a rigid regulatory and policy framework, the rapid expansion of (and competition from) low-cost, agile competitors, and the Corporation's ongoing financial challenges. Canadians expect Canada Post, its bargaining agents and its sole shareholder, the Government of Canada, to work together as stewards of the national postal service.

The goal is a self-sustainable postal service that has the flexibility to modernize and serve all Canadians in today's economy.

The needs of Canadians and Canadian businesses are changing significantly, and Canada Post must change with them. The Corporation continues to work with its shareholder and bargaining agents to address the significant structural, regulatory and financial issues facing the postal service, and ensure this critical national infrastructure is there for all Canadians long into the future. Canada Post is a lifeline for many Canadians, businesses, organizations and communities in every corner of the country. We're the only delivery company with the people, network and commitment to deliver to all of Canada. We understand the important role we play as a publicly owned corporation and a responsible corporate citizen.

Canada Post's revenue is generated in a highly competitive ecommerce and parcels market; its Parcels line of business generated 46 per cent (nearly \$2.8 billion) of the Corporation's revenue in 2024. With a mandate to fund operations with revenue from the sale of products and services – rather than taxpayer funding – it is even more critical that certain information not be disclosed due to its commercial sensitivity and the potential prejudice to Canada Post's position in this marketplace. While most government documents are non-commercial by definition, the opposite is true at Canada Post.

To reflect this operating reality, section 18.1(1)(a) was added to the Act in 2007, for Canada Post's exclusive use and to acknowledge the unique commercial context in which it operates.

As a Crown corporation that serves Canadians, Canada Post embraces the principle of transparency. The company is committed to its corporate environmental, social and governance (ESG) strategy, in which transparency is core to its foundation and objectives. The company's commitment to transparency is demonstrated in several ways, including the publication of a comprehensive Annual Report and quarterly reports about its business and financial performance, its Sustainability Report, postal services information guides, and through regular disclosures on canadapost.ca. In the context of access to information, transparency informs the approach to requests for information made under the Act.

1.2 Canada Post and the Access to Information Act

Canada Post has been subject to the *Access to Information Act* since September 1, 2007. The Corporation is strongly committed to meeting its statutory obligations. It is of paramount importance that a requesters' right of access is respected and balanced with the protection of commercially sensitive, confidential and third-party information.

Considering that approximately half of Canada Post's revenue is earned in the highly competitive ecommerce and parcel markets, it is even more critical that certain

information not be disclosed due to its commercial sensitivity and the potential prejudice to Canada Post's position in this marketplace. To reflect this operating reality, section 18.1(1)(a) was added to the Act in 2007, for Canada Post's exclusive use and to acknowledge the unique commercial context in which it operates.

As a Crown corporation that serves all Canadians, Canada Post embraces the principle of transparency. It is committed to its environmental, social and governance (ESG) strategy that considers transparency as an important foundational value and objective. This commitment is demonstrated in several ways, including the publication of a comprehensive annual report detailing its business and financial performance, the *Canada Postal Guide*, the *Sustainability Report* and through regular disclosures on **canadapost.ca**. In the context of access to information, transparency informs the approach to requests for information made under the Act.

2. Organizational Structure

The Access to Information and Privacy Directorate (the Directorate) is led by the ATI and Privacy Director, who also acts as the ATIP Coordinator. It is one of the portfolios under the responsibility of the General Manager of Corporate Compliance (CC). The CC team is within the Legal and Corporate Affairs Directorate.

The Directorate is responsible for the administration of the *Access to Information Act* and the *Privacy Act*, the operational accountability for the programs, the administration and processing of access requests received by Canada Post under both acts and the response to complaints from the Office of the Privacy Commissioner of Canada (OPC) and the Office of the Information Commissioner of Canada (OIC). The Directorate's portfolio is divided among two managers.

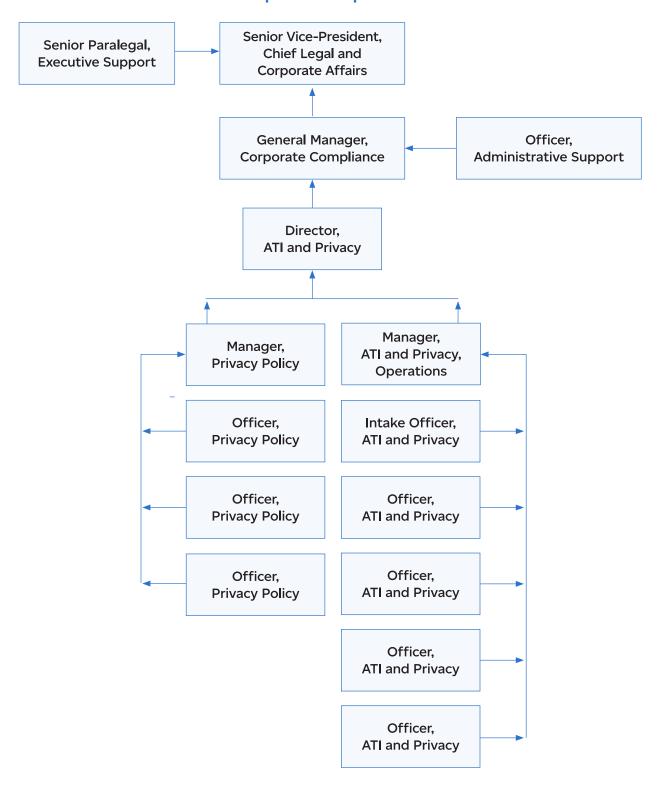
The ATI and Privacy Manager, Operations, oversees the processing of active access requests (under both acts), the performance of the program, and acts as the first level of approval of access requests. In 2024-2025, four ATI and Privacy officers and one intake officer were reporting to the ATI and Privacy Manager, Operations.

The Privacy Policy Manager is responsible for the administration of the *Privacy Act* and operational accountability for the privacy management program. The Privacy Office is the centre of excellence for privacy; data protection and anti-spam matters across the Corporation. It works with the lines of business and functional areas to proactively ensure that privacy is built into the design, development and implementation of products, services and programs. During the reporting period, the Privacy Office included two Privacy officers reporting to the Privacy Policy Manager. A third Privacy officer joined the Privacy Office, early in 2025.

In 2024-2025, Canada Post was not a party to any service agreements under section 96 of the *Access to Information Act*.

The chart below outlines our organizational structure as of March 31, 2025.

Corporate Compliance



2.1 Governance

The Directorate has the commitment and support of senior management and the Board of Directors to ensure that the Corporation meets its obligations under the Access to Information Act.

The ATI Advisory Committee, composed of Canada Post executives from key lines of business, has a mandate to support the Directorate from a corporate perspective. It was created in 2007 when Canada Post first became subject to the Act and meets monthly to provide strategic advice and guide the ATI P Directorate with respect to new requests received during the month. It also helps resolve and escalate issues related to the processing of active ATI requests.

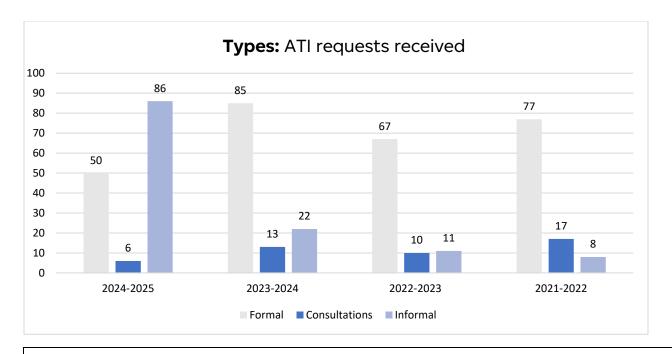
In addition, offices of primary interest (OPIs) have been identified under general managers across the Corporation. A network of liaison officers (LOs) represents OPIs to coordinate and liaise with the Access to Information Directorate in processing records for ATI requests.

3. Delegation Order

As required by the Treasury Board of Canada Secretariat, a copy of the delegation order is included in Appendix A.

4. Performance of the Access to Information Program in 2024-2025

During this reporting period, there was a significant increase in informal requests compared to the previous year. This shift is partly attributed to changes in intake procedures. When internal processes for obtaining records informally were already in place, requesters were directed to the appropriate internal OPIs to follow those established procedures. As a result, these requests were handled as informal rather than formal ATI requests.



Formal ATI requests: Requesters can seek to obtain corporate records under the control of Canada Post.

ATI consultations: Any record or set of records responding to a particular request that is transmitted from the ATI and Privacy Directorate of another government institution to Canada Post's ATI and Privacy Directorate for its review as well as the review of Canada Post's offices of primary interest. The consultations allow Canada Post to express any concerns with the disclosure of information contained in the set of records.

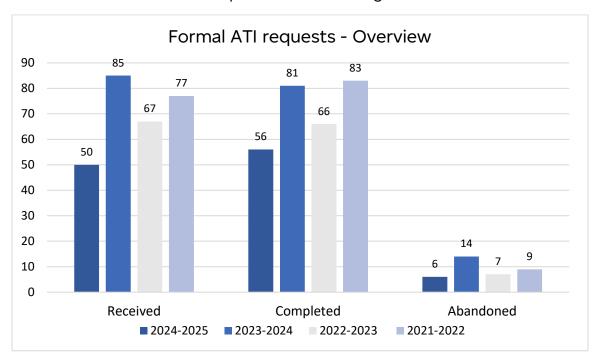
Informal ATI requests: Requesters can seek to obtain records that were released in a previous ATI request completed by the ATI and Privacy Directorate.

Although every ATI request is unique, the following subjects were of particular interest to Canadians in 2024-2025:

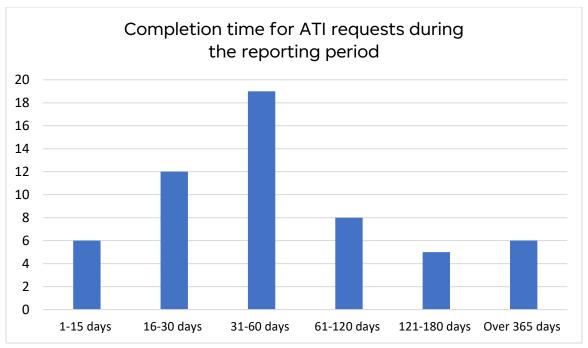
- Records detailing total bonus payouts and Executive compensation.
- Information related to the decommissioning of Canada Post vehicles.
- Records relating to Canada Post's fleet conversion to electric vehicles.
- Information pertaining to Canada Post Digital Strategy and Framework.
- Information pertaining to Canada Post Real Estate portfolio.
- Information regarding suspicious mail.
- Records concerning the firearms buy-back program.
- Information regarding financial difficulties.

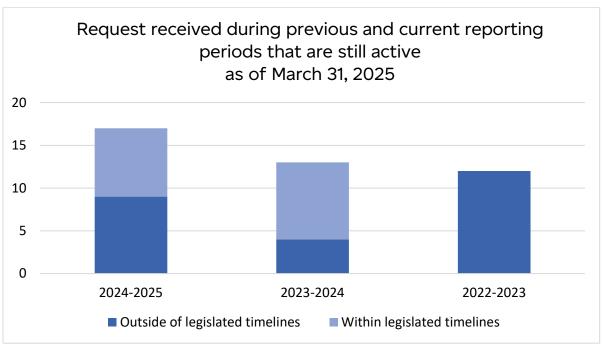
4.1 Volume of requests

There is a notable decrease in the receipt and processing of formal ATIs during this reporting period compared to the previous year. This reduction is partly due to changes in intake-level processes. Where an internal process already existed to obtain records informally, requesters were redirected to the appropriate internal business area to follow the established process for obtaining records.



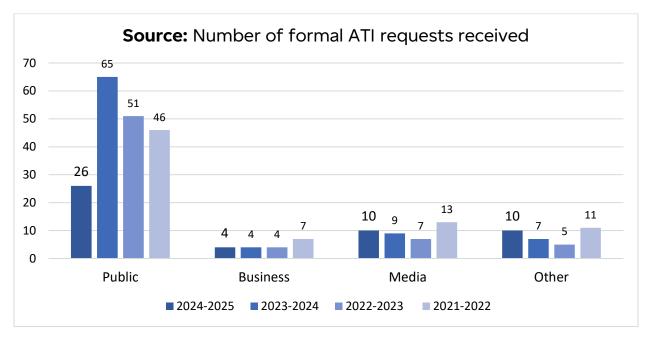
Several of the requests that were processed exceeding the legislative timelines involved large volumes of records and required coordination across multiple offices of primary interest.





Notably, some requests from previous reporting periods had already received partial releases.

4.2 Sources



Public: Includes any requester who has identified themselves as a Canada Post employee, customer or generally as a member of the public when submitting their request.

Business: Includes but is not limited to representatives of private sector companies or corporations, information brokers, lawyers, agents, consultants and paid lobbyists. This category also includes any requesters who have identified themselves as "Business" when submitting their request.

Media: Includes but is not limited to journalists, reporters (newspapers, television or other media sources) and researchers (newspapers, television or other media sources). This category also includes any requesters who have identified themselves as "Media" when submitting their request.

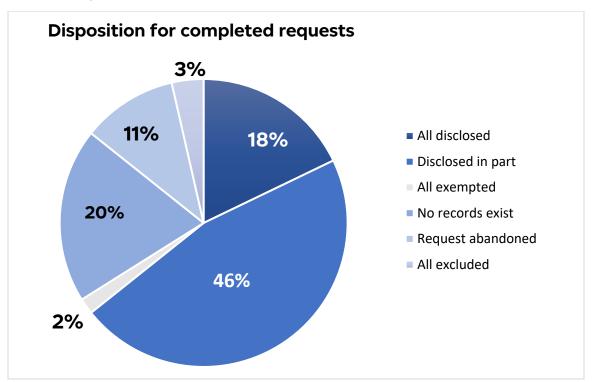
Other: Includes requests originating from academia and organizations (e.g., non-profit) when submitting their request.

4.3 Extensions

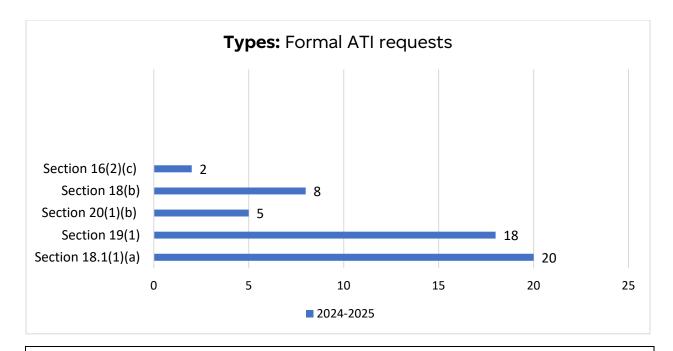
A total of 36 extensions were taken during the reporting period. Most extensions were required under section 9(1)(a) of the Act due to the large number of records involved and the fact that meeting the original time limit would unreasonably interfere with operations. Many of these requests involved retrieval of records from multiple record holders, a significant number of pages to review or a combination of these two factors.

Eleven extensions were taken under section 9(1)(b) for internal consultations or consultations with other government departments.

4.4 Exemptions



Overall, compared to the previous reporting period, a larger proportion of completed requests were partially disclosed. However, the categories of exemptions most frequently applied remain unchanged. These exemptions continue to reflect the nature of the organization as a Crown corporation that must be financially self-sustaining while operating in a highly competitive ecommerce and parcel delivery market.



Section 16(2)(c) – Information pertaining to the vulnerability of buildings or systems that could be expected to facilitate the commission of an offence.

Section 18(b) – Prejudice to the competitive position of a government institution or to interfere with contractual or other negotiations of a government institution.

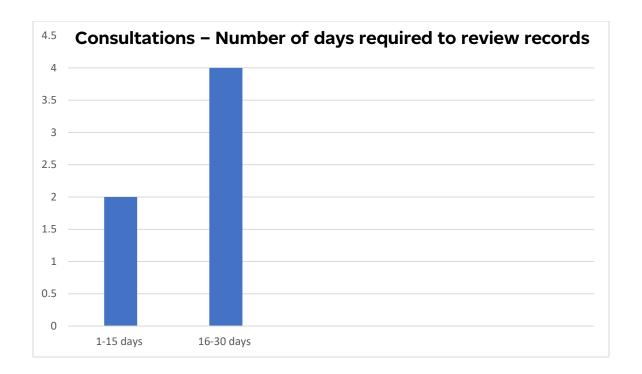
Section 18.1(1)(a) – Canada Post's financial, commercial or technical information that has consistently been treated as confidential.

Section 19(1) - Personal information.

Section 20(1)(b) – Financial, commercial, scientific or technical information that is confidential information supplied to a government by a third party and is treated consistently in a confidential manner by the third party.

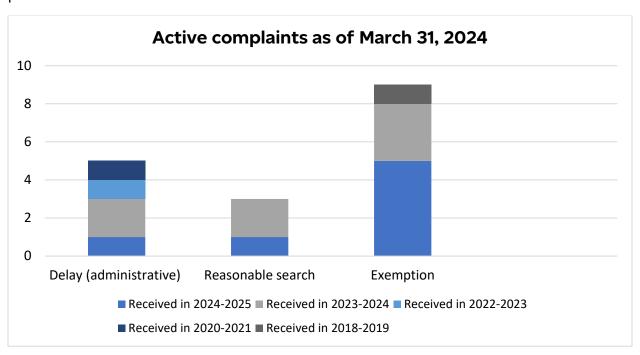
4.5 Consultations

During the reporting period, the Directorate received a total of 11 consultations from other government institutions and departments. The chart below illustrates the number of days required to review the records and provide a response to the consultation.



4.6 Complaints

Canada Post received seven complaints in 2024-2025, a 36% decrease, compared to the last reporting period. Out of the seven complaints received, one was due to delay and six were due to exemptions invoked. Five of the complaints are active, one was closed during the same reporting period, and one was closed after the reporting period ended.



5. Training and awareness

Several meetings were held with internal business areas to identify the appropriate OPIs for various record types and to provide education on the ATI process and obligations of the record holders. Best practices for record retrieval were also shared to enhance the efficiency of locating and submitting records to the ATI and Privacy officers.

Awareness and education on the *Access to Information Act* were delivered throughout the year to OPIs, LOs, and key stakeholders, focusing on the Act's requirements, roles, responsibilities, and obligations of record holders.

Throughout the reporting period, the Privacy Manager conducted a series of workshops on interpreting and applying various sections and principles of the Act. In 2024–2025, new members joined the broader team, and additional one-on-one coaching sessions were provided to these new members, focusing on the practical application of specific sections of the Act.

6. Policies, guidelines and procedures

During the reporting period, new and enhanced procedures, updated guidelines, and improved tools were implemented, including:

- Review and revisions to the Delegation of Authority under the ATIA and Privacy Act;
- Revised checklist to use when closing ATI files;
- Revised complaints process;
- Revised closing summary for ATI files;
- Several guidance documents were prepared as reference tools for the ATI and Privacy officers on the application of different sections of the Access to Information Act.

These guidelines are evergreen and, therefore, will be reviewed and revised as required.

7. Proactive Publication Under Part 2 of the Act

Canada Post is a Crown corporation listed in Schedule III, Part I of the *Financial Administration Act.* As such, the table below contains the proactive publication requirements that apply to Canada Post:

Legislative requirement	Section	Publication timeline	Canada Post requirement				
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	Х				
Hospitality expenses	83	Within 30 days after the end of the month of reimbursement	Х				
Reports tabled in Parliament	84	Within 30 days after tabling	Х				

In 2024-2025, the entirety of the information applicable to Canada Post above was published within the legislated timelines and requirements.

The publication of travel and hospitality expenses is the responsibility of the Corporate Travel team. As such, they prepare monthly disclosure reports, pertaining to travel and hospitality expenses. Each executive reviews these monthly reports. Once approved, they are provided to the Canada Post Web team to be published on the corporate website. The Corporate Travel team also prepares the annual travel aggregate report for publication on Canada Post's website.

The travel and hospitality expenses of Canada Post's Board of Directors and senior management is published on Canada Post's website on a monthly basis online: <u>Travel and hospitality expenses.</u>

The Directorate is responsible for publishing the annual reports tabled in Parliament on the following webpages of the Canada Post website:

- Access to information
- Privacy centre

The Directorate also sends the annual reports to the required institutions (the Office of the Information Commissioner of Canada and the Treasury Board of Canada Secretariat).

During the reporting period, Canada Post met its proactive publication requirements at a compliance rate of one hundred per cent (100%).

8. Initiatives and projects to improve access to information

During the reporting period, the Directorate implemented a major upgrade to its case management software and redaction program, which facilitated the processing and management of ATI requests. This modernization introduced automation for tasks previously performed manually and transitioned to a cloud-based infrastructure to enhance system speed, particularly for handling large requests. Both the legacy and upgraded systems are currently running concurrently.

Once all active files in the legacy system are closed, the transition is expected to significantly improve processing times. The software upgrade was fully completed on December 29, 2024.

In 2024, an action plan was developed to address the Deemed Refusal Rate (DRR) and ensure timely processing of all new requests. The plan focused on the root causes of the late files and put into place measures including new procedures and timelines to process requests. These efforts were reflected in a gradual decline of the DRR throughout the reporting period.

In 2022-2023, the Directorate identified commonly requested records and worked with key business areas to develop or leverage existing processes to obtain records, enabling Canadians to access information more quickly without submitting formal ATI requests. This initiative has continued and during the 2024-2025 year, a new approach was implemented with four business areas, allowing them to respond directly to requesters.

As a result, the ATI and Privacy Directorate has seen a significant decrease in similar requests, allowing more resources to be dedicated to processing larger, formal ATI requests. This trend is illustrated in the volume chart in section 4.

During the reporting period, the ATI and Privacy gap analysis was reviewed and updated to identify gaps and priority areas for improvement. As a result, several initiatives were undertaken including an action plan to reduce the DRR, the delegation of authority review, enhancements to the complaints process, new procedures, and other identified opportunities for improvement.

9. Summary of key issues and actions taken on compliance

The Directorate proactively engages and maintains an ongoing dialogue with the OIC to foster the relationship and promote a collaborative approach. Both parties are committed to effectively resolve outstanding complaints and, where possible, aim for early resolution.

During this reporting period, proactive measures were implemented with the objective of reducing formal complaints.

The ATIP Directorate engaged with requesters at the outset when it was necessary to suggest a reformulation of the request text to manage expectations and ensure the timely release of records.

Several workshops were delivered to the ATIP team which focused on the application of specific exemptions, exercise of discretion, and duty to assist.

A key challenge during the reporting period was balancing priorities between processing requests involving administrative (delay) complaints and meeting legislated timelines for active ATI and Privacy requests. Since ATI and Privacy officers are involved in both areas, the ATI and Privacy Manager, Operations, assumed a greater role in handling complaint files to help mitigate delays.

10. Monitoring compliance

The Directorate continued to seek opportunities to strengthen accountability to meet the legislative requirements. Several measures continue to be in place to monitor and evaluate the processing of ATI requests.

Canada Post uses Amanda 7 software by Granicus to manage all requests received under the *Access to Information Act*. The software has a functionality that allows us to monitor the status and time taken to process ATI requests.

On a weekly basis, the ATI and Privacy Manager, Operations meets with the ATI and Privacy Director to discuss status updates and challenges of all active ATI requests and strategize on approaches for specific requests. The frequency of these meetings has allowed the team to quickly work toward solutions and revise priorities to address any obstacles that would put files at risk of being late.

On a monthly basis, the Directorate prepares an internal report, which contains various statistics pertaining to the processing of access requests stemming from both acts, as well as status updates on active complaints received from the Office of the Privacy Commissioner of Canada and the Office of the Information Commissioner of Canada. This report is also presented to the General Manager of Corporate Compliance who leverages this information to provide briefings to senior executives and offices of

primary interest on key requests and broader issues or challenges pertaining to access to information.

The Directorate has continued to improve its internal process to identify incoming requests that could potentially be addressed informally and develop a collaborative approach with key stakeholders and business areas within the Corporation. The Directorate also thoroughly tracks the types of records and information requested. This allows Canada Post to identify important trends as well as flag the type of information that could be proactively disclosed by various means, such as the website, or other reports issued by Canada Post throughout the year. In addition, on a quarterly basis, this internal report is enhanced by information on legislative, policy and case law updates.

With respect to the inter-institutional consultations, a concerted effort has been made to exercise discretion to conduct consultations and only in instances where a full or partial release of the information contained in their records was considered. A reasonable timeline is provided to other institutions including status update inquiries. There is no formal monitoring of the frequency and the length of consultations with ATI and Privacy management.

The Corporate Travel team provides updates of the proactive publication of travel and hospitality expenses to the External Finance Reporting team. This internal monitoring is part of the Finance team's quarterly compliance monitoring.

11. Conclusion

Canada Post is committed to an approach to access to information that is aligned with the needs of Canadians for accountability and transparency of information. To that end, we continue to develop and implement the vision for the program. It is imperative to challenge the status quo, develop internal processes and innovative and tailored awareness and education. This improves operational efficiencies to ensure legislative obligations are met, develops accountabilities across the organization and increases transparency. While doing so, it is critical that the Corporation protects its proprietary and commercially sensitive information as well as the information of its partners, suppliers and customers in accordance with the Access to Information Act. This accountability is fundamental to these relationships and the trust they have in the Corporation. The right of access to corporate information of Canada Post is a right of all Canadians. Canada Post believes in being a transparent organization and in doing so, respects this fundamental right of access.

Appendix A – Delegation Order

<u>Canada Post Corporation</u> <u>Delegation Order</u>

The President and Chief Executive Officer of the Canada Post Corporation, Doug Ettinger, on this 22 day of 2021 pursuant to section 96(1) of the Access to Information Act, hereby designates the persons holding the positions set out in the schedule hereto to exercise the powers and perform the duties and functions of the President and Chief Executive Officer, the Head of the Institution, for the purposes of the Access to Information Act, as set out hereto in the schedule below.

Delegation of Powers, Duties or Functions Pursuant to Section 96(1) of the *Access to Information Act*

		Delegation Order					
Section	Power, Duties or Functions	Chief Executive Officer	Senior Vice- President, General Counsel and Sustainability	General Manager and Chief Privacy Officer (CPO)	Director, Access to Information and Privacy	Manager, Access to Information and Privacy	Officer, Access to Information and Privacy
4(2.1)	Duty to Assist: Responsibility of government institutions	Х	Х	Х	Х		
7(a)	Notice when access requested within 30 days	Х	Х	Х	Х	Х	
7(b)	Giving access to record or part thereof	Х	Х	Х	Х		
8(1)	Transfer of request to another government institution	Х	х	Х	х		
9	Extension of time limits for responding to request and issue notice	Х	х	Х	х		
11 (2)(3)(4)(5)(6)	Administration and Collection of fees	Х	Х	Х	Х	Х	
12(2)(b)	Language of access	Х	Х	Х	Х	Х	
12(3)(b)	Access in an alternative format	Х	Х	Х	Х	Х	

Exemption Provisions of the *Access to Information Act*

		Delegation Order					
Section	Power, Duties or Functions	Chief Executive Officer	Senior Vice- President, General Counsel and Sustainability	General Manager and Chief Privacy Officer (CPO)	Director, Access to Information and Privacy	Manager, Access to Information and Privacy	Officer, Access to Information and Privacy
13	Exemption – Information obtained in confidence from other gov'ts/organizations	Х	х	Х	х		
14	Exemption – Federal- provincial affairs	Х	Х	Х	Х		
15	Exemption – International affairs and defence	X	Х	Х	X		
16	Exemption – Law enforcement and investigations	Х	х	X	х		
16.5	Exemption – Public Servants Disclosure Protection Act	X	Х	Х	х		
17	Exemption – Safety of Individuals	Х	Х	Х	Х		
18	Exemption – Economic interests of Canada	Х	Х	Х			
18.1	Exemption – Economic interests of the Canada Post Corporation	Х	х	Х			
19	Exemption – Personal information	Х	Х	Х	х		
20	Exemption – Third-party information	Х	Х	Х	Х		
21	Exemption – Operations of Government	Х	Х	X	Х		
22	Exemption – Testing procedures, tests and audits	Х	Х	Х	Х		

			Delegation Order				
Section	Power, Duties or Functions	Chief Executive Officer	Senior Vice- President, General Counsel and Sustainability	General Manager and Chief Privacy Officer (CPO)	Director, Access to Information and Privacy	Manager, Access to Information and Privacy	Officer, Access to Information and Privacy
22.1	Exemption – Audit working papers and draft audit reports	Х	х	Х	х		
23	Exemption – Solicitor-client privilege	Х	Х	Х	Х		
24	Exemption – Statutory prohibitions against disclosure	Х	х	Х	х		

Other Provisions of the <u>Access to Information Act</u>

		Delegation Order					
Section	Power, Duties or Functions	Chief Executive Officer	Senior Vice- President, General Counsel and Sustainability	General Manager and Chief Privacy Officer (CPO)	Director, Access to Information and Privacy	Manager, Access to Information and Privacy	Officer, Access to Information and Privacy
25	Severability	Х	Х	X	Х		
26	Exception – refusal of access where info to be published	Х	Х	Х	Х		
27(1),(4)	Third-party notification	Х	Х	Х	Х	Х	
28(1)(b) (2),(4)	Third-party representations and decision	Х	Х	Х	Х		
29(1)	Disclosure of record where the Information Commissioner recommends disclosure	х	Х	Х			
33	Shall advise Information Commissioner of third party that has been notified when refusing to disclose record	х	Х	Х	х		
35(2)(b)	Right to make representations in course of investigation	Х	х	Х			

		Delegation Order						
Section	Power, Duties or Functions	Chief Executive Officer	Senior Vice- President, General Counsel and Sustainability	General Manager and Chief Privacy Officer (CPO)	Director, Access to Information and Privacy	Manager, Access to Information and Privacy	Officer, Access to Information and Privacy	
37(4)	Notice to Information Commissioner where access to record given previously withheld records	х	х	Х				
43(1)	Provide notice to third party upon application to Federal Court for judicial review by third party or OIC	х	Х	Х	х			
44(2)	Provide notice to applicant upon application to Federal Court for judicial review by third party or OIC	х	Х	Х	х			
52(2)(b)(3)	Request special rules for hearings	Х	х	Х	Х			
71(1)	Provide facilities for inspection of manuals and exclude exempted information	х	Х	Х	Х			
72	Prepare for submission of Annual Report to Parliament of the administration of this Act	×	х	Х				

Delegation of Powers, Duties or Functions Pursuant to the <u>Access to Information Regulations</u>

		Delegation Order						
Section	Power, Duties or Functions	Chief Executive Officer	Senior Vice- President, General Counsel and Sustainability	General Manager and Chief Privacy Officer (CPO)	Director, Access to Information and Privacy	Manager, Access to Information and Privacy	Officer, Access to Information and Privacy	
6(1)	Transfer of request	Х	Х	Х	X	Х		
7(2)	Search and preparation fees							
7(3)	Production and programming fees							
8	Providing access to record(s)	Х	X	X	Х	Х		
8.1	Limitations in respect to format	Х	Х	Х	Х	Х		

NB: The Director, Access to Information and Privacy, and the Managers of the Access to Information and Privacy programs are authorized to designate in writing a member of their staff to act on their behalf in case of absence or unavailability.

DATED, at the City of Delawa_, this _33__ day of Sept _____ 2021

Doug Ettinger, President and CEO, Canada Post Corporation

Appendix B – Canada Post Corporation wholly owned subsidiaries

1. Introduction

The information contained in this report relates to the administration of the *Privacy Act* at the following wholly owned subsidiaries of the Corporation from April 1, 2024, to March 31, 2025.

2. Activities

2.1 2875039 Canada Limited

As a holding company, 2875039 Canada Limited does not employ staff, but elects a director who is also the president and secretary of the company.

2875039 Canada Limited was incorporated on December 4, 1992, under the *Canada Business Corporations Act*. The company is a wholly owned subsidiary of Canada Post Corporation and holds interests in Purolator Holdings Ltd.

2.2 2875047 Canada Limited

As a holding company, 2875047 Canada Limited does not employ staff, but elects a director who is also the president and secretary of the company.

2875047 Canada Limited was incorporated on December 4, 1992, under the *Canada Business Corporations Act*. The company is a wholly owned subsidiary of Canada Post Corporation. It is currently inactive.

2.3 3906949 Canada Inc.

As a holding company, 3906949 Canada Inc. does not employ staff, but elects a director who is also the president and secretary of the company.

3906949 Canada Inc. was incorporated on June 15, 2001, under the *Canada Business Corporations Act*. The company is a wholly owned subsidiary of Canada Post Corporation and holds interests in 2875039 Canada Limited.

3. Delegation of Authority

There is no delegation of authority applicable to any wholly owned subsidiary of the Corporation.

4. Request Activity

Canada Post's wholly owned subsidiaries did not receive any *Access to Information Act* requests in 2024-25.

Appendix C - Treasury Board of Canada Secretariat Statistical Report

Government Gouvernement of Canada du Canada

Statistical Report on the Access to Information Act

Name of institution: Canada Post Corporation

Reporting period: <u>2024-04-01</u> to <u>2025-03-31</u>

Section 1: Requests Under the Access to Information Act

1.1 Number of requests

		Number of Requests
Received during reporting period	50	
Outstanding from previous reporting period		23
Outstanding from previous reporting period	12	
Outstanding from more than one reporting period	11	
Total		73
Closed during reporting period		56
Carried over to next reporting period		17
Carried over within legislated timeline	8	
Carried over beyond legislated timeline	9	

1.2 Sources of requests

Source	Number of Requests
Media	10
Academia	1
Business (private sector)	4
Organization	9
Public	26
Decline to Identify	0
Total	50

1.3 Channels of requests

Source	Number of Requests
Online	30
Email	16
Mail	4
In person	0
Phone	0
Fax	0
Total	50



26

Section 2: Informal requests

2.1 Number of informal requests

		Number of Requests
Received during reporting period	86	
Outstanding from previous reporting periods	7	
Outstanding from previous reporting period		
Outstanding from more than one reporting period	0	
Total		93
Closed during reporting period		88
Carried over to next reporting period	5	

2.2 Channels of informal requests

Source	Number of Requests
Online	7
Email	44
Mail	35
In person	0
Phone	0
Fax	0
Total	86

2.3 Completion time of informal requests

Completion Time

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
39	10	15	21	3	0	0	88

2.4 Pages released informally

Less Than Relea	•	100-! Pages Re		501-1000 Pages Released				More Tha Pages Re	
Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Pages Requests Released		Number of Requests	Pages Released	Number of Requests	Pages Released
0	0	0	0	0	0	0	0	0	0

2.5 Pages re-released informally

Less Than Relea	•	100-! Pages Re		501-1000 Pages Released		1001-5000 Pages Released		More Than 5000 Pages Released	
Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released
75	1,366	10	2,802	2	1,482	1	2,540	0	0

Section 3: Applications to the Information Commissioner on Declining to Act on Requests

	Number of Requests
Outstanding from previous reporting period	0
Sent during reporting period	0
Total	0
Approved by the Information Commissioner during reporting period	0
Declined by the Information Commissioner during reporting period	0
Withdrawn during reporting period	0
Carried over to next reporting period	0

Section 4: Requests Closed During the Reporting Period

4.1 Disposition and completion time

				Com	pletion Time	:		
Disposition of 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	1	1	7	1	0	0	0	10
Disclosed in part	1	5	9	5	5	0	1	26
All exempted	0	1	0	0	0	0	0	1
All excluded	1	1	0	0	0	0	0	2
No records exist	3	4	2	1	0	0	1	11
Request transferred	0	0	0	0	0	0	0	0
Request abandoned	0	0	1	1	0	0	4	6
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Declined to act with the approval of the Information Commissioner	0	0	0	0	0	0	0	0
Total	6	12	19	8	5	0	6	56

4.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests	Section	Number of Requests		
13(1)(a)	0	16(2)	1	18(a)	0	20.1	0		
13(1)(b)	1	16(2)(a)	0	18(b)	8	20.2	0		
13(1)(c)	0	16(2)(b)	0	18(c)	0	20.4	0		
13(1)(d)	0	16(2)(c)	2	18(d)	0	21(1)(a)	6		
13(1)(e)	0	16(3)	0	18.1(1)(a)	20	21(1)(b)	13		
14	0	16.1(1)(a)	0	18.1(1)(b)	0	21(1)(c)	0		
14(a)	0	16.1(1)(b)	0	18.1(1)(c)	0	21(1)(d)	1		
14(b)	0	16.1(1)(c)	0	18.1(1)(d)	0	22	0		
15(1)	0	16.1(1)(d)	0	19(1)	18	22.1(1)	0		
15(1) - I.A.*	0	16.2(1)	0	20(1)(a)	0	23	4		
15(1) - Def.*	0	16.3	0	20(1)(b)	5	23.1	0		
15(1) - S.A.*	0	16.4(1)(a)	0	20(1)(b.1)	0	24(1)	0		
16(1)(a)(i)	0	16.4(1)(b)	0	20(1)(c)	0	26	0		
16(1)(a)(ii)	0	16.5	0	20(1)(d)	0				
16(1)(a)(iii)	0	16.6	0			_			
16(1)(b)	0	17	2	1					
16(1)(c)	1	*		•					
16(1)(d)	0	^ I.A.: Interna	I.A.: International Affairs Def.: Defence of Canada S.A.: Subversive Activities						

4.3 Exclusions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
68(a)	2	69(1)	0	69(1)(g) re (a)	0
68(b)	0	69(1)(a)	0	69(1)(g) re (b)	0
68(c)	0	69(1)(b)	0	69(1)(g) re (c)	0
68.1	0	69(1)(c)	0	69(1)(g) re (d)	0
68.2(a)	0	69(1)(d)	0	69(1)(g) re (e)	0
68.2(b)	0	69(1)(e)	0	69(1)(g) re (f)	0
		69(1)(f)	0	69.1(1)	0

4.4 Format of information released

Paper	E-record	Other			
32	4	0	0	0	0

4.5 Complexity

4.5.1 Relevant pages processed and disclosed for <u>paper</u> and <u>e-record</u> formats

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
13,378	3,543	45

4.5.2 Relevant pages processed and disclosed by size of requests

		nan 100 rocessed	101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
Disposition	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	10	194	0	0	0	0	0	0	0	0
Disclosed in part	17	611	7	2366	0	0	2	3698	0	0
All exempted	0	0	1	388	0	0	0	0	0	0
All excluded	2	0	0	0	0	0	0	0	0	0
Request abandoned	5	0	0	0	0	0	0	0	1	6121
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Declined to act with the approval of the Information Commissioner	0	0	0	0	0	0	0	0	0	0
Total	34	805	8	2754	0	0	2	3698	1	6121

4.5.3 Relevant minutes processed and disclosed for <u>audio</u> formats

Number of Minutes Processed	Number of Minutes Disclosed	Number of Requests
0	0	0

4.5.4 Relevant minutes processed per request disposition for audio formats by size of requests

	Less than 60 Minutes processed					120 Minutes essed
Disposition	Number of requests	Minutes Processed	Number of requests	Minutes Processed	Number of requests	Minutes Processed
All disclosed	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0
All exempted	0	0	0	0	0	0
All excluded	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0
Declined to act with the approval of the Information Commissioner	0	0	0	0	0	0
Total	0	0	0	0	0	0

4.5.5 Relevant minutes processed and disclosed for <u>video</u> formats

Number of Minutes Processed	Number of Minutes Disclosed	Number of Requests
0	0	0

4.5.6 Relevant minutes processed per request disposition for video formats by size of requests

	Less than 60 Minutes processed		60-120 Minutes processed		More than 120 Minutes processed	
Disposition	Number of requests	Minutes Processed	Number of requests	Minutes Processed	Number of requests	Minutes Processed
All disclosed	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0
All exempted	0	0	0	0	0	0
All excluded	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0
Declined to act with the approval of the Information Commissioner	0	0	0	0	0	0
Total	0	0	0	0	0	0

4.5.7 Other complexities

Disposition	Consultation Required	Legal Advice Sought	Other	Total
All disclosed	0	0	0	0
Disclosed in part	6	0	0	6
All exempted	0	0	0	0
All excluded	0	0	0	0
Request abandoned	0	0	0	0
Neither confirmed nor denied	0	0	0	0
Declined to act with the approval of the Information Commissioner	0	0	0	0
Total	6	0	0	6

4.6 Closed requests

4.6.1 Number of requests closed within legislated timelines

	Requests closed within legislated timelines
Number of requests closed within legislated timelines	48
Percentage of requests closed within legislated timelines (%)	85.71428571

4.7 Deemed refusals

4.7.1 Reasons for not meeting legislated timelines

	Principal Reason					
Number of Requests Closed Past the Legislated Timelines	Interference with Operations / Workload	Other				
8	8	0	0	0		

4.7.2 Requests closed beyond legislated timelines (including any extension taken)

Number of Days Past Legislated Timelines	Number of Requests Past Legislated Timeline Where No Extension Was Taken	Number of Requests Past Legislated Timelines Where an Extension Was Taken	Total
1 to 15 days	2	0	2
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	6	6
Total	2	6	8

4.8 Requests for translation

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

Section 5: Extensions

5.1 Reasons for extensions and disposition of requests

Disposition of Requests Where	9(1)(a) Interference With	9(1)(b) Consultation		9(1)c Third-Party
an Extension Was Taken	Operations/ Workload	Section 69	Other	Notice
All disclosed	1	0	6	0
Disclosed in part	15	0	4	1
All exempted	0	0	0	0
All excluded	0	0	0	0
Request abandoned	0	0	0	0
No records exist	3	0	0	0
Declined to act with the approval of the Information Commissioner	6	0	0	0
Total	25	0	10	1

5.2 Length of extensions

Disposition of Requests Where	9(1)(a) Interference With	9(1)(b) Consultation		9(1)c Third-Party
an Extension Was Taken	Operations/ Workload	Section 69	Other	Notice
30 days or less	12	0	6	0
31 to 60 days	7	0	3	0
61 to 120 days	5	0	1	1
121 to 180 days	1	0	0	0
181 to 365 days	0	0	0	0
365 days or more	0	0	0	0
Total	25	0	10	1

Section 6: Fees

	Fee Collected Fee Waived		aived	Fee Refunded		
Fee Type	Number of Requests	Amount	Number of Requests	Amount	Number of Requests	Amount
Application	46	\$230.00	4	\$20.00	0	\$0.00
Other fees	0	\$0.00	0	\$0.00	0	\$0.00
Total	46	\$230.00	4	\$20.00	0	\$0.00

Section 7: Consultations Received from Other Institutions and Organizations

7.1 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	3	29	3	19
Outstanding from the previous reporting period	0	0	0	0
Total	3	29	3	19
Closed during the reporting period	3	29	3	19
Carried over to the next reporting period	0	0	0	0
Carried over beyond negotiated timelines	0	0	0	0

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

		Number of Days Required to Complete Consultation Requests						
Recommendation	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
Disclose entirely	1	0	0	0	0	0	0	1
Disclose in part	0	1	0	0	0	0	0	1
Exempt entirely	0	0	0	0	0	0	0	0
Exclude entirely	0	0	0	0	0	0	0	0
Consult other institution	0	1	0	0	0	0	0	1
Other	0	0	0	0	0	0	0	0
Total	1	2	0	0	0	0	0	3

7.3 Recommendations and completion time for consultations received from other organizations outside the Government of Canada

		Number of days required to complete consultation requests						
Recommendation	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	1	0	0	0	0	0	0	1
Disclosed in part	0	2	0	0	0	0	0	2
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	1	2	0	0	0	0	0	3

Section 8: Completion Time of Consultations on Cabinet Confidences

8.1 Requests with Legal Services

		han 100 rocessed		D Pages essed		O Pages essed		5000 rocessed		an 5000 rocessed
Number of Days	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

	Fewer than 100 101-500 Pa Pages Processed Processes		•	501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed		
Number of Days	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
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

8.2 Requests with Privy Council Office

	Fewer Than 100 101-500 Pages Pages Processed Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed			
Number of Days	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

Section 9: Investigations and Reports of Finding

9.1 Investigations

Section 32 Notice of intention to investigate	Subsection 30(5) Ceased to investigate	Section 35 Formal Representations
7	0	0

9.2 Investigations and Reports of finding

Section 37(1) Initial Reports

Received	Containing recommendations issued by the Information Commissioner	Containing orders issued by the Information Commissioner
0	0	0

Section 37(2) Final Reports

Received	Containing recommendations issued by the Information Commissioner	Containing orders issued by the Information Commissioner
0	0	0

Section 10: Court Action

10.1 Court actions on complaints

Section 41

Complainant (1)	Institution (2)	Third Party (3)	Privacy Commissioner (4)	Total
0	0	0	0	0

10.2 Court actions on third party notifications under paragraph 28(1)(b)

Section 44 – under paragraph 28(1)(b)	
0	

Section 11: Resources Related to the Access to Information Act

11.1 Allocated Costs

Expenditures	Amount	
Salaries	\$304,273	
Overtime	\$0	
Goods and Services		\$24,151
Professional services contracts	\$0	
Other	\$24,151	
Total		\$328,424

11.2 Human Resources

Resources	Person Years Dedicated to Access to Information Activities
Full-time employees	3.178
Part-time and casual employees	0.000
Regional staff	0.000
Consultants and agency personnel	0.000
Students	0.000

Resources	Person Years Dedicated to Access to Information Activities	
Total	3.178	

Note: Enter values to three decimal places.

Appendix D – Supplemental Statistical Report on the Access to Information Act and Privacy Act

*	Government	Gouvernement
不	of Canada	du Canada

Supplemental Statistical Report on the Access to Information Act and Privacy Act

Name of institution:	Canada Post Corporation			
D	2024 04 01	4	2025 02 24	
Reporting period:	<u>2024-04-01</u>	to	<u>2025-03-31</u>	

Section 1: Open Requests and Complaints Under the Access to Information Act

1.1 Enter the number of open requests that are outstanding from previous reporting periods.

Fiscal Year Open Requests Were Received	Open Requests that are Within Legislated Timelines as of March 31, 2025	Open Requests that are Beyond Legislated Timelines as of March 31, 2025	Total
Received in 2024-2025	8	2	10
Received in 2023-2024	0	2	2
Received in 2022-2023	0	4	4
Received in 2021-2022	0	0	0
Received in 2020-2021	0	1	1
Received in 2019-2020	0	0	0
Received in 2018-2019	0	0	0
Received in 2017-2018	0	0	0
Received in 2016-2017	0	0	0
Received in 2015-2016	0	0	0
Received in 2014-2015 or earlier	0	0	0
Total	8	9	17

1.2 Enter the number of open complaints with the Information Commissioner of Canada that are outstanding from previous reporting periods.

Fiscal Year Open Complaints Were Received by Institution	Number of Open Complaints
Received in 2024-2025	7
Received in 2023-2024	7
Received in 2022-2023	1
Received in 2021-2022	1
Received in 2020-2021	0
Received in 2019-2020	0
Received in 2018-2019	1
Received in 2017-2018	0
Received in 2016-2017	0
Received in 2015-2016	0
Received in 2014-2015 or earlier	0
Total	17

Section 2: Open Requests and Complaints Under the Privacy Act

2.1 Enter the number of open requests that are outstanding from previous reporting periods.

Fiscal Year Open Requests Were Received	Open Requests that are Within Legislated Timelines as of March 31, 2025	Open Requests that are <i>Beyond</i> Legislated Timelines as of March 31, 2025	Total
Received in 2024-2025	10	3	13
Received in 2023-2024	0	5	5
Received in 2022-2023	0	2	2
Received in 2021-2022	0	2	2
Received in 2020-2021	0	0	0
Received in 2019-2020	0	0	0
Received in 2018-2019	0	0	0
Received in 2017-2018	0	0	0
Received in 2016-2017	0	0	0
Received in 2015-2016	0	0	0
Received in 2014-2015	0	0	0
Received in 2013-2014 or earlier	0	0	0

Fiscal Year Open Requests Were Received	Open Requests that are Within Legislated Timelines as of March 31, 2025	Open Requests that are <i>Beyond</i> Legislated Timelines as of March 31, 2025	Total
Received in 2024-2025	10	з	13
Total	10	12	22

2.2 Enter the number of open complaints with the Privacy Commissioner of Canada that are outstanding from previous reporting periods.

Fiscal Year Open Complaints Were Received by Institution	Number of Open Complaints
Received in 2024-2025	6
Received in 2023-2024	0
Received in 2022-2023	0
Received in 2021-2022	0
Received in 2020-2021	0
Received in 2019-2020	0
Received in 2018-2019	0
Received in 2017-2018	0
Received in 2016-2017	0
Received in 2015-2016	0
Received in 2014-2015 or earlier	0
Total	6

Section 3: Social Insurance Number (SIN)

Did your institution receive authority for a new collection or new consistent use of the SIN in	No
2024-2025?	INO

Section 4: Universal Access under the Privacy Act

How many requests were received from confirmed foreign nationals outside of Canada in		
2024-2025?	0	