

EXPORT DEVELOPMENT CANADA
ANNUAL REPORT ON THE
ADMINISTRATION OF THE *ACCESS TO INFORMATION ACT*

April 1, 2017 to March 31, 2018

INTRODUCTION AND MANDATE

Export Development Canada (“EDC”) was established on October 1, 1969 (as Export Development Corporation) by the *Export Development Act* (the “EDA”). EDC is an agent of Her Majesty in Right of Canada and a Crown Corporation whose shares may be owned only by Canada. EDC is accountable for its affairs to Parliament through the Minister of International Trade. Its mandate is to support and develop, directly or indirectly, Canada’s export trade and Canadian capacity to engage in that trade as well as respond to international business opportunities. EDC’s mandate was amended in June 2017 to give an additional purpose of providing, directly or indirectly, development financing and other forms of development support in a manner that is consistent with Canada’s international development opportunities. Regulations enacted under the EDA clarify circumstances under which EDC may exercise certain powers. EDC provides trade financing, export credit insurance and bonding services, as well as foreign market expertise.

EDC incorporated Development Finance Institute Canada (DFIC) Inc. (“FinDev Canada”) as a wholly owned subsidiary in September 2017. The report on FinDev Canada’s administration of the *Access to Information Act* (the “Act”) for the period September 14, 2017 to March 31, 2018 is tabled separately.

EDC also incorporated Exinvest Inc. as a wholly owned subsidiary in 1995. The report on Exinvest’s administration of the Act for the period April 1, 2017 to March 31, 2018 is tabled separately.

The Act is a federal statute that provides a right of access to records under the control of certain federal government institutions, such as EDC, to Canadian citizens, permanent residents, as well as individuals and corporations located in Canada. EDC became subject to the Act on September 1, 2007.

EDC’s financial year aligns with the calendar year. In accordance with Treasury Board Secretariat (“TBS”) requirements, all government institutions subject to the Act must report on an April 1 to March 31 reporting cycle irrespective of their specific financial year.

This report is tabled in Parliament and prepared in accordance with section 72 of the Act.

THE PRIVACY AND ACCESS TO INFORMATION TEAM

The Privacy & Access to Information (“Privacy & ATI”) Team is part of the Compliance & Ethics Group. The Privacy and ATI Team administers the Act for EDC and is responsible for responding to all requests submitted to EDC under the Act.

During the 2017-2018 reporting period, the Privacy & ATI Team was comprised of three (3) full-time employees: the Manager, Privacy & ATI; and two Privacy & ATI Advisors. The Privacy & ATI Team reports to the Director, Compliance & Ethics who reports to the Vice-President and Chief Compliance & Ethics Officer. The Senior Vice-President and Chief Risk Officer, Enterprise Risk Management is the senior executive responsible for Privacy and Access to Information.

Within Compliance & Ethics, the Privacy & ATI Team is responsible for the development, coordination and implementation of effective policies and processes to manage EDC’s compliance with the Act. The Manager, Privacy & ATI acts as the point of contact for the Corporation in dealings with TBS, the Information Commissioner, and other government institutions on access to information matters.

Business Liaison Officers (“BLO”s) have been designated across the Corporation to coordinate team-specific access to information activities related to the processing of requests and provide guidance to colleagues on the administrative processes related to the Act.

DELEGATION OF AUTHORITY

The President and Chief Executive Officer (“President & CEO”) of EDC is designated as the head of the institution for the purposes of the Act.

Pursuant to section 73 of the Act, the President and CEO’s authority has been delegated to enable the Corporation meeting its legislated requirements. The President & CEO has delegated most of his powers and duties to: the Senior Vice-President and Chief Risk Officer, Enterprise Risk Management; the Vice-President and Chief Compliance & Ethics Officer; the Director, Compliance & Ethics; and the Manager, Privacy & ATI.

As requested by TBS, a copy of the delegation order is appended hereto as Appendix Q.

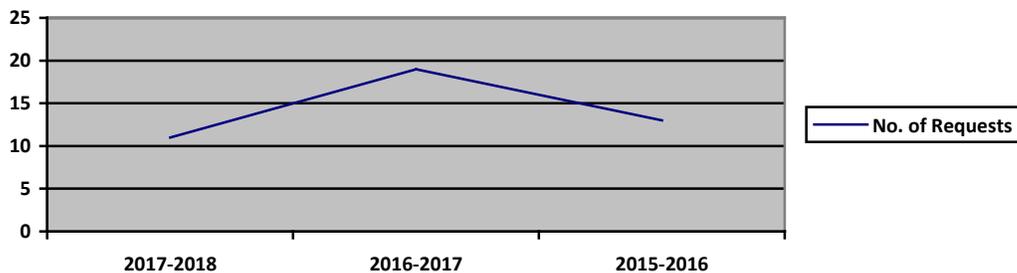
STATISTICAL REPORTS

Requests

As requested by TBS, the appended Statistical Reports cover a twelve-month period from April 1, 2017 to March 31, 2018. The following are highlights of the Statistical Reports appended hereto:

- EDC received eleven (11) new requests for information under the Act.
- Four (4) requests were carried over from the current reporting period to be completed during the next reporting period.
- Two (2) requests required an extension under section 9(1)(a) and 9(1)(b) of the Act due to consultation with another government department and high volume of records.
- The appended Statistical Report provide information related to the types of exemptions applied to the completed requests.

The number of requests received continues to be low and this is consistent with previous reporting periods. The chart below shows the trends for the past three (3) reporting periods.



Consultations

EDC must also respond to consultations pursuant to the Act from other government institutions in order to provide those institutions with recommendations regarding the release of information related to EDC.

From April 1, 2017 to March 31, 2018, nineteen (19) consultations were received from government institutions including: Global Affairs Canada; Department of Finance Canada; and Privy Council Office.

Informal Requests

During the reporting period, EDC responded to one (1) informal request, outside of the formal process under the Act.

TRAINING AND AWARENESS PROGRAM

During the reporting period, the Privacy & ATI Team continued to promote awareness of the Corporation's obligations under the Act through a variety of training approaches provided in both official languages.

Orientation Training

The Privacy & ATI Team presented at all Employee Orientation Training sessions held for new EDC employees. During the reporting period, nine (9) orientation sessions were held and four (4) customized training sessions were held for various business groups. A total of two hundred and thirty-five (235) employees received awareness training regarding EDC's obligations under the Act.

Privacy & ATI Website

EDC's internal Privacy & ATI Website is accessed through *livewire*, EDC's Employee Intranet. The internal Privacy & ATI Website includes Frequently Asked Questions as well as links to related Corporate Policies, the Privacy & ATI Service Request Form, EDC's Info Source page, privacy e-Modules and the ATI Online Tutorial.

Business Liaison Officer (BLO) Training

Based on the number of requests EDC receives annually, the Business Liaison Officer (BLO) training model consists of customized, 1:1 or small group training and guidance at the time a request is received. This customized approach supports EDC's legislative duty to assist requesters: by ensuring the BLO understands their obligations and deadlines; through immediate identification of any ambiguity within the request text requiring clarification with the requester; and by facilitating a collaborative approach between teams with regard to record retrieval with the intention of improving efficiencies and minimizing duplicate records.

INSTITUTION-SPECIFIC POLICIES, GUIDELINES AND PROCEDURES

EDC did not implement any new policies, guidelines or procedures related to access to information during the reporting period. EDC has established and reminds employees of their obligations under the following policies, guidelines and processes related to the Act:

- EDC Access to Information Policy;
- EDC Wrongdoings Policy;
- Procedures concerning subsection 67.1(1) of the Act;
- EDC Code of Conduct;
- BLO Checklist – Responding to Access to Information Requests; and
- BLO Checklist – Responding to Consultation Requests (from other Government institutions).

CORPORATE INITIATIVES

EDC Code of Conduct

EDC is committed to upholding the highest standards of personal and professional conduct. As such, EDC requires all employees to complete an annual review and sign off on EDC's Code of Conduct (the "Code"). EDC promotes the Code through various types of awareness communications to all employees, on a quarterly basis. The Code, together with the Values and Ethics Code for the Public Sector forms an integral part of EDC's ethical framework. It sets out the values and behaviours EDC employees must exemplify in our capacity as employees of a Crown corporation.

The Code includes EDC employee obligations under the Act, to help ensure effective and consistent administration and compliance with the Act and its regulations.

COMPLAINTS AND INVESTIGATIONS

During the reporting period, EDC received one (1) new complaint under the Act. The Office of the Information Commissioner ("OIC") conducted an investigation into this complaint and the complaint was settled.

EDC received four (4) complaints under the Act in the previous reporting period. The OIC is currently conducting investigations into these complaints.

The complaint received in 2015 has not yet been assigned an investigator.

MONITORING THE TIME TO PROCESS ACCESS TO INFORMATION REQUESTS

EDC utilizes the Access Pro Suite by CSDC Systems Inc. to manage all requests received under the Act. The software has a dashboard functionality which allows the Manager, Privacy & ATI to monitor the status and time taken to process access to information requests.

**TABLE OF AUTHORITY
DELEGATIONS OF AUTHORITY
PURSUANT TO SECTION 73 OF THE ACCESS TO INFORMATION ACT AND REGULATIONS
PRIVACY AND ACCESS TO INFORMATION (PRIVACY & ATI) TEAM**

Authorization

1. Authorization to exercise or perform powers, duties or functions of the head of the institution under the Access to Information Act and Regulations.

Access to Information – Section 73																																				
SECTIONS	4(2.1)	7(a)	7(b)	8(1)	9	11(2), (3),(4), (5),(6)	12 (2)(b)	12 (3)(b)	13	14	15	16	16.5	17	18	18.1	19	20	21	22	22.1	23	24	25	26	27 (1),(4)	28(1)(b),(2) (4)	29(1)	33	35(2)(b)	37(4)	43(1)	44(2)	52(2) (b),(3)	71(1)	72
PRESIDENT & CEO	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
SVP & CHIEF RISK OFFICER, ERM	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
VP &CCO	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
DIRECTOR, COMPLIANCE & ETHICS	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
MANAGER, COMPLIANCE & ETHICS	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Access to Information Regulations. Section 73																																				
SECTIONS	6(1)	7(2)	7(3)	8	8.1																															
PRESIDENT & CEO	X	X	X	X	X																															
SVP & CHIEF RISK OFFICER	X	X	X	X	X																															
VP & CCO	X	X	X	X	X																															
DIRECTOR, COMPLIANCE & ETHICS	X	X	X	X	X																															
MANAGER, ATIP COMPLIANCE & ETHICS	X	X	X	X	X																															

<i>Access to Information Act – Sections</i>		<i>Access to Information Regulations – Sections</i>	
4(2.1) Responsibility of government institutions	17 Exemption - Safety of individuals	28(1)(b),(2),(4) Third party-notification	6(1) Transfer of request
7(a) Notice when access requested	18 Exemption - Economic interests of Canada	29(1) Where the Information Commissioner recommends disclosure	7(1) Transfer of request
7(b) Giving access to record	18.1 Exemption - Economic interest of the Canada Post Corporation, Export Development Canada, the Public Sector Pension Investment Board and VIA Rail Canada Inc.	33 Advising Information Commissioner of third-party involvement	7(2) Search and preparation fees
8(1) Transfer of request to another government institution	19 Exemption - Personal Information	35(2)(b) Right to make representations	7(3) Production and programming fees
9 Extension of time limits	20 Exemption - Third-party information	37(4) Access to be given to complainant	8 Providing access to record(s)
11(2),(3),(4),(5),(6) Additional Fees	21 Exemption - Operations of Government	43(1) Notice to third party (application to Federal Court for review)	8.1 Limitations in respect of format
12(2)(b) Language of access	22 Exemption - Testing procedures, tests and audits	44(2) Notice to applicant (application to Federal Court by third party)	
12(3)(b) Access in an alternative format	22.1 Exemption – Audit working papers and draft audit reports	52(2)(b),(3) Special rules for hearings	
13 Exemption - Information obtained in confidence	23 Exemption - Solicitor-client privilege	71(1) Facilities for inspection of manuals	
14 Exemption - Federal-Provincial affairs	24 Exemption - Statutory prohibitions	72 Annual report to Parliament	
15 Exemption - International affairs and defence	25 Severability		
16 Exemption - Law enforcement and investigations	26 Exemption - Information to be published		
16.5 Exemption – <i>Public Servants Disclosure Protection Act</i>	27(1),(4) Third party-notification		

2. Titles

All of the above titles include their equivalent under any future designation.

3. Previous Authorities

All current authority designations executed by the President and Chief Executive Officer of EDC (e.g. the head of the corporation) (the "Designations"), are replaced by these Table of Authority and Table Notes without in any way affecting the validity of acts done pursuant to such Designations.



President & Chief Executive Officer

14 / 04 / 16

Date



Statistical Report on the Access to Information Act

Name of institution: EXPORT DEVELOPMENT CANADA

Reporting period: 2017-04-01 to 2018-03-31

Part 1: Requests Under the Access to Information Act

1.1 Number of requests

	Number of Requests
Received during reporting period	11
Outstanding from previous reporting period	2
Total	13
Closed during reporting period	9
Carried over to next reporting period	4

1.2 Sources of requests

Source	Number of Requests
Media	3
Academia	2
Business (private sector)	1
Organization	2
Public	3
Decline to Identify	0
Total	11

1.3 Informal requests

Completion Time							Total
1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	
0	1	0	0	0	0	0	1

Note: All requests previously recorded as “treated informally” will now be accounted for in this section only.

Part 2: Requests Closed During the Reporting Period

2.1 Disposition and completion time

Disposition of Requests	Completion Time							Total
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	
All disclosed	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	1	1	0	0	2
All exempted	3	0	0	0	0	0	0	3
All excluded	0	0	0	0	0	0	0	0
No records exist	2	1	0	0	0	0	0	3
Request transferred	0	0	0	0	0	0	0	0
Request abandoned	0	1	0	0	0	0	0	1
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	5	2	0	1	1	0	0	9

2.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
13(1)(a)	2	16(2)	0	18(a)	0	20.1	0
13(1)(b)	1	16(2)(a)	0	18(b)	0	20.2	0
13(1)(c)	0	16(2)(b)	0	18(c)	0	20.4	0
13(1)(d)	0	16(2)(c)	1	18(d)	0	21(1)(a)	2
13(1)(e)	0	16(3)	0	18.1(1)(a)	0	21(1)(b)	2
14	0	16.1(1)(a)	0	18.1(1)(b)	2	21(1)(c)	2
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)	2	16.1(1)(d)	0	19(1)	2	22.1(1)	0
15(1) - I.A.*	0	16.2(1)	0	20(1)(a)	0	23	2
15(1) - Def.*	0	16.3	0	20(1)(b)	1	24(1)	5
15(1) - S.A.*	0	16.4(1)(a)	0	20(1)(b.1)	0	26	0
16(1)(a)(i)	0	16.4(1)(b)	0	20(1)(c)	1		
16(1)(a)(ii)	0	16.5	0	20(1)(d)	1		
16(1)(a)(iii)	0	17	0				
16(1)(b)	0						
16(1)(c)	0						
16(1)(d)	0						

* I.A.: International Affairs Def.: Defence of Canada S.A.: Subversive Activities

2.3 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

2.4 Format of information released

Disposition	Paper	Electronic	Other Formats
All disclosed	0	0	0
Disclosed in part	0	2	0
Total	0	2	0

2.5 Complexity

2.5.1 Relevant pages processed and disclosed

Disposition of Requests	Number of Pages Processed	Number of Pages Disclosed	Number of Requests
All disclosed	0	0	0
Disclosed in part	6698	914	2
All exempted	0	0	3
All excluded	0	0	0
Request abandoned	0	0	1
Neither confirmed nor denied	0	0	0

2.5.2 Relevant pages processed and disclosed by size of requests

Disposition	Less Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
All disclosed	0	0	0	0	0	0	0	0	0	0
Disclosed in part	1	5	0	0	0	0	0	0	1	909
All exempted	3	0	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Request abandoned	1	0	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	5	5	0	0	0	0	0	0	1	909

2.5.3 Other complexities

Disposition	Consultation Required	Assessment of Fees	Legal Advice Sought	Other	Total
All disclosed	0	0	0	0	0
Disclosed in part	1	0	0	0	1
All exempted	0	0	0	0	0
All excluded	0	0	0	0	0
Request abandoned	0	0	0	0	0
Neither confirmed nor	0	0	0	0	0
Total	1	0	0	0	1

2.6 Deemed refusals

2.6.1 Reasons for not meeting statutory deadline

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

2.6.2 Number of days past deadline

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

2.7 Requests for translation

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

Part 3: Extensions

3.1 Reasons for extensions and disposition of requests

Disposition of Requests Where an Extension Was Taken	9(1)(a) Interference With Operations	9(1)(b) Consultation		9(1)(c) Third-Party Notice
		Section 69	Other	
All disclosed	0	0	0	0
Disclosed in part	2	0	1	0
All exempted	0	0	0	0
All excluded	0	0	0	0
No records exist	0	0	0	0
Request abandoned	0	0	0	0
Total	2	0	1	0

3.2 Length of extensions

Length of Extensions	9(1)(a) Interference With Operations	9(1)(b) Consultation		9(1)(c) Third-Party Notice
		Section 69	Other	
30 days or less	0	0	0	0
31 to 60 days	0	0	0	0
61 to 120 days	1	0	0	0
121 to 180 days	1	0	1	0
181 to 365 days	0	0	0	0
365 days or more	0	0	0	0
Total	2	0	1	0

Part 4: Fees

Fee Type	Fee Collected		Fee Waived or Refunded	
	Number of Requests	Amount	Number of Requests	Amount
Application	5	\$25	6	\$30
Search	0	\$0	0	\$0
Production	0	\$0	0	\$0
Programming	0	\$0	0	\$0
Preparation	0	\$0	0	\$0
Alternative format	0	\$0	0	\$0
Reproduction	0	\$0	0	\$0
Total	5	\$25	6	\$30

Part 5: Consultations Received From Other Institutions and Organizations

5.1 Consultations received from other Government of Canada institutions and organizations

Consultations	Other Government of Canada Institutions	Number of Pages to Review	Other Organizations	Number of Pages to Review
Received during reporting period	19	0	0	0
Outstanding from the previous reporting period	1	0	0	0
Total	20	0	0	0
Closed during the reporting period	19	0	0	0
Pending at the end of the reporting period	1	0	0	0

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

Recommendation	Number of Days Required to Complete Consultation Requests							Total
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	
Disclose entirely	7	0	0	0	0	0	0	7
Disclose in part	4	0	2	1	0	0	0	7
Exempt entirely	2	3	0	0	0	0	0	5
Exclude entirely	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	13	3	2	1	0	0	0	19

5.3 Recommendations and completion time for consultations received from other organizations

Recommendation	Number of Days Required to Complete Consultation Requests							Total
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	
Disclose entirely	0	0	0	0	0	0	0	0
Disclose in part	0	0	0	0	0	0	0	0
Exempt entirely	0	0	0	0	0	0	0	0
Exclude entirely	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

Part 6: Completion Time of Consultations on Cabinet Confidences

6.1 Requests with Legal Services

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

6.2 Requests with Privy Council Office

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

Part 7: Complaints and Investigations

Section 32	Section 35	Section 37	Total
1	0	0	1

Part 8: Court Action

Section 41	Section 42	Section 44	Total
0	0	0	0

Part 9: Resources Related to the *Access to Information Act*

9.1 Costs

Expenditures		Amount
Salaries		\$102,479
Overtime		\$0
Goods and Services		\$65,367
• Professional services contracts	\$65,367	
• Other	\$0	
Total		\$167,846

9.2 Human Resources

Resources	Person Years Dedicated to Access to Information Activities
Full-time employees	1.00
Part-time and casual employees	0.04
Regional staff	0.00
Consultants and agency personnel	4.00
Students	0.00
Total	5.04

Note: Enter values to two decimal places.