



ANNUAL REPORT TO PARLIAMENT ON THE *ACCESS TO INFORMATION ACT*

For the reporting period of
April 1, 2025 to March 31, 2026

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Introduction

The *Access to Information Act* (R.S.C. 1985, c. A-1) came into force on July 1, 1983. It grants Canadian citizens, permanent residents and persons residing in Canada the right to access information contained in federal government records, except for those types of information that are subject to exceptions or exclusions. Section 94 of the *Access to Information Act* requires the head of each federal agency to submit an annual report to Parliament on the administration of the Act within its institution during the fiscal year.

1. Description of the report

This report is submitted pursuant to section 94 of the *Access to Information Act*. It provides an overview of the activities carried out by the Quebec Port Authority (hereinafter referred to as “the Authority”) in the area of access to information during the reference period from April 1, 2025 to March 31, 2026.

The Authority, a not-for-profit shared governance organization, was established on May 1, 1999, following the adoption of the *Canada Marine Act*.

This report also aims to meet the reporting requirements, where applicable, of the Authority’s non-operational subsidiary (15854997 CANADA INC.).

2. Mission

The mission of the Authority is to promote and develop maritime trade, to serve the economic interests of the Québec City region and of Canada, and to ensure its profitability in a way that respects both the community and environment.

3. Organisational structure

From April 1, 2025 to March 31, 2026, the Chief, Legal Services and Corporate Secretary served as the *Access to Information Act* Coordinator for the Authority and held the delegated authority for this role (see the delegation of authority attached as Appendix “A”).

She was supported in access to information tasks by Legal Counsel responsible for access to information, as well as by an administrative assistant, both of whom work more broadly within the Authority’s legal services function.

As per established practices, all formal access to information requests are submitted via the email address demande-acces@portquebec.ca, which is monitored daily by the Authority’s Access to Information Officer. In collaboration with the Coordinator, the Officer ensures that all requests are processed diligently and in accordance with the provisions of the Act. This team operates within a secure digital environment. A separate file is opened for each request to ensure confidentiality.

Under Part 2 of the Act, the administrative assistant of Legal Services is responsible for proactively publishing travel and hospitality expenses duly approved by the Authority on the Government of Canada’s website (<https://registry.open.canada.ca/>).

With respect to service contracts under section 96 of the *Access to Information Act*, the Authority did not provide any services related to access to information during the current reporting period.

4. Delegation of Authority

For the period covered, the *Access to Information Act* Coordinator was Sarah-Ève Pelletier, Chief, Legal Services and Corporate Secretary. She was responsible for decision-making regarding the application of the various provisions of the *Access to Information Act* (see the delegation of authority attached as Appendix “A”).

5. 2025-2026 Findings according to Part 1 of the *Access to Information Act*

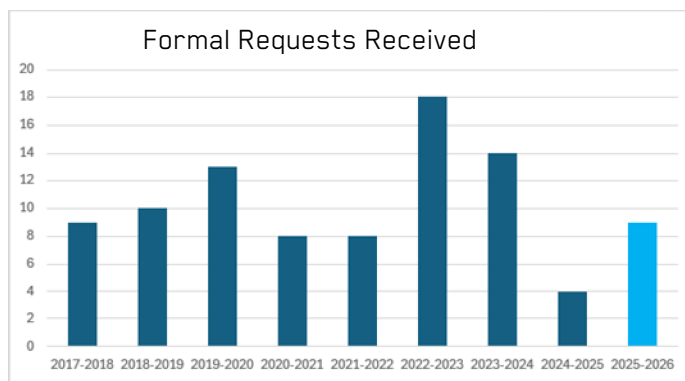
Part 1 of the *Access to Information Act* addresses official requests received by federal institutions, which must be processed in accordance with prescribed rules. In spring 2026, the Authority submitted its statistical reports in both official languages, covering both the *Access to Information Act* and the *Privacy Act*. These reports account for official requests and exclude those received through unofficial channels. The following sections highlight key findings from these reports and provide contextual analysis.

5.1 Number of requests processed

Between April 1, 2025 and March 31, 2026, the Administration received 9 formal requests. These requests came from the public and commercial sectors and are represented as follows:

Sector	Number	Percentage
Public	3	33,3 %
Organization	0	0 %
Media	0	0 %
Academic	0	0 %
Commercial	6	66,6 %

Compared to the previous year, namely the period from April 1, 2024 to March 31, 2025, the Administration had processed 4 requests under the *Access to Information Act*. This represents an increase of 225 %.



At the end of the 2025–2026 period, these 9 requests had been processed, and none were carried forward to the 2026–2027 period.

5.2 Processing Time

During the reporting period:

- 3 requests were processed within a maximum of 15 days.

- 1 request was processed within 15 to 30 days.
- 1 request was processed within 31 to 60 days.
- 3 requests were processed within 61 to 120 days.
- 1 request was processed within 121 to 180 days.

In total, for the 2025–2026 period, 44% of requests were answered within the initial timeframe prescribed by the Act.

5.3 Deadline Extensions

Five requests were subject to extensions of the time limit. Four requests were processed within 31 to 120 days, while one request was processed within 121 to 180 days. These extensions were justified on two grounds: first, the large number of pages to be processed, as well as the number of items per page that required the application of an exclusion or exemption from disclosure; and second, the requirement to provide notice to third parties and obtain their representations.

As the Administration does not have a dedicated access to information office, this work is instead distributed according to the organizational structure set out in section 4, where access to information represents only one part of the portfolios assigned. Accordingly, the ground for extension provided for in section 9(1)(a) of the Act, namely that complying with the initial time limit prescribed by the Act in connection with the request would seriously interfere with the operation of the institution, is applicable in this case. Furthermore, as the APQ conducts business with multiple private companies as well as municipal, provincial, and federal levels of government, certain requests required notices to third parties and the obtaining of their representations, as provided for in sections 27 and 28 of the Act. An extension of the initial time limit is therefore necessary to consult these third parties in accordance with the requirements set out in the Act.

5.4 Number of pages processed and disclosed

During the 2025-2026 reporting period, 1,053 pages were processed and disclosed. Some of these pages were partially released, meaning that portions were redacted in accordance with the disclosure exceptions provided under the Act.

For the previous period (2024-2025), the number of pages processed and disclosed was 4,052.

5.5 Exceptions and exclusions

The *Access to Information Act* provides for several exemptions and exclusions under which an institution may refuse—or is required to refuse—the disclosure of certain information.

For the 2025-2026 reporting period, the Authority invoked the following exceptions:

- Sections 18(a), (b), (c) and (d) 18 a
- Section 19(1)
- Section 20(1)(a), (b), (b.1), (c) and (d)

5.6 Percentage of requests for which the disposition of records was “full disclosure” and the percentage for which it was “partial disclosure”

For the 2025-2026 reporting period, the table below shows the percentage of requests for which the disposition of records was full disclosure and the percentage for which it was partial disclosure. In addition, the Authority did not hold any records responsive to one of the requests received, and therefore no documents were disclosed in that case.

Disclosure Type	%
Full disclosure	0%
Partial disclosure	75%
No document found responding to the request	25%

5.7 Consultations

No consultation requests from other institutions were forwarded to the Authority during the reporting period.

5.8 Active complaints

During the 2025-2026 reporting period, the Authority did not receive any new complaints. The Authority received 2 investigation notices from the Information Commissioner of Canada pursuant to section 32 of the Act. In one case, the file resulted in the termination of the investigation; in the second, the investigation process is ongoing and the file remains active.

5.9 Costs

The total estimated cost of implementing the *Access to Information Act* for the Authority is \$114,110. These costs include, among other things, the processing of requests and files with the Office of the Information Commissioner and the production of the annual report and statistical reports. They also include an external professional services contract valued at \$60,270, which enabled the Authority to fulfill its obligations under the Act during a period when Authority staff were absent for an extended period.

6. Training and Awareness

The Authority remains committed to training and maintaining a workforce with specialized expertise, capable of continuing to provide the highest quality service to both internal and external clients. To that end, the individuals holding the positions of *Access to Information Act* and *Privacy Act* Coordinator and Access to Information Officer are both members of the Barreau du Québec. They, along with all members of the team described in section 4 above, regularly participate in access to information training offered through the government GCCollab platform.

It is important to note that each new employee of the Authority is met with individually to inform them of the requirements and applicability of the *Access to Information Act* and the *Privacy Act*. During the 2025-2026 reporting period, 25 new employees received training on the requirements of the *Access to Information Act* and the *Privacy Act*.

Finally, training sessions are provided to administrative staff on procedures related to proactive publication. In addition, the internal data collection cycle is now aligned with other organizational processes.

7. Access to Information Framework

7.1 Measures to ensure public access to information

During the 2025-2026 reporting period, the Authority updated its Info Source page, which lists its activities and the information holdings it maintains. This information is compiled for submission to the Treasury Board Secretariat. Info Source is intended to help the public access government information and exercise the rights granted under the *Access to Information Act* and the *Privacy Act*.

Throughout the reference period, the Authority maintained its profile on the Government of Canada's Completed Access to Information Requests portal, allowing members of the public who wish to obtain a copy of documents published in response to requests listed on the government website to make such a request.

7.2 Policies, directives and procedures

During the reference period, the Authority maintained its policies and guidelines related to access to information and the protection of personal information, in accordance with the requirements of the Treasury Board Secretariat.

The Authority no longer requires the payment of the \$5.00 fee for new access to information requests submitted directly to it through its platforms (see section 9.2 for further context), as of 2024.

The Authority also applies an internal proactive publication procedure to strengthen the accuracy, completeness and timeliness of published information. In particular, to better align with the administrative cycle, travel and hospitality expenses are now compiled and published in a centralized and standardized manner. This makes it easier to obtain the required information in a timely manner from all relevant sectors (see the Table of Proactive Publication Requirements attached as Appendix "B").

8. Improving Access to Information

8.1 Initiatives and Projects

Following the forward-looking analysis undertaken during the previous year, the Authority concluded that developing a specialized technological tool for processing large and complex access to information requests is not justified given the volume of requests it receives. It also considers that the development of such a tool would be better undertaken by a central authority, which could then make it available to all institutions subject to the Act, thereby enabling more efficient use of public resources and greater consistency in practices.

In addition, the master table designed to compile all data required by the Treasury Board Secretariat for the statistical reports on access to information and personal information requests has been completed. Its implementation now provides significant efficiency gains in preparing monthly and annual statistical reports, while promoting more structured, consistent and reliable data collection.

Finally, in the context of two access to information requests formulated in very general terms and consequently likely to require the processing of a considerable volume of records, the Authority assisted the requester in better identifying their needs, clarifying the scope of the requests, and agreeing on the most appropriate way to respond. It became apparent that the information sought by the requester was better suited to a question addressed to the Communications department

than to an access to information request. While ensuring that the requester remained entirely free to proceed under the *Access to Information Act*, the requester chose to withdraw the requests once the information sought had been obtained directly from members of the Authority's senior management. This exceptional approach was successful in the circumstances, allowing the requested information to be provided efficiently through a transparent and cooperative approach. The Authority will consider using this approach again when the nature of the request lends itself to it and the requester concerned consents to it.

8.2 Summary of key issues and measures taken on complaints or investigations

During the current reporting period, two investigations were initiated by the Information Commissioner. No application for judicial review was filed with the Federal Court and no appeal was filed with the Federal Court of Appeal.

Regarding the first of these investigations, following the disclosure of a greater portion of the information contained in the documents previously shared, the requester indicated that they were satisfied and withdrew their request, thereby bringing the investigation to an end.

Regarding the second investigation, the Authority sent the requester a new response with revised partial disclosure of the requested documents. As this file is still being processed by the Information Commissioner, the Authority will be able to report on the lessons learned once it is concluded.

The Authority has drawn lessons from access to information requests involving a very large number of pages. The experience gained confirms the importance of establishing, from the outset of processing, a rigorous and consistent work method, particularly with respect to document organization, version tracking and the recording of actions taken. These practices promote more efficient processing of requests, facilitate communication with stakeholders, and help ensure the accuracy of the information reported in statistical reports and responses provided to requesters.

Following an analysis of the issue and consultations with potential suppliers, the Authority concluded that developing a document-processing tool designed specifically for access to information and incorporating artificial intelligence would not be justified at this time, given the costs and implementation complexity relative to the volume of requests. It therefore continues to use PDF processing software to perform this work semi-manually. However, development of such a software solution by a centralized organization, which could then make it available to institutions subject to the Act, would represent an interesting avenue, particularly by allowing the costs and resources required for its design and maintenance to be shared.

APPENDIX “A”

Instrument of Delegation of
Authorities – *Access to Information
Act* and *Privacy Act*

In effect since April 29, 2024

Instrument of Delegation of Authorities

Notes regarding delegation

The purpose of this section is to establish the management framework for the *Access to Information Act* and the *Privacy Act*. In accordance with section 73 of the *Privacy Act* and section 73 of the *Access to Information Act*, I, the undersigned, Olga Farman, President and CEO of the Québec Port Authority, delegate to its Chief, Legal Services and Corporate Secretary, Ms. Sarah-Ève Pelletier, the power to perform the duties of Access to Information and Privacy Coordinator under the provisions of the aforementioned statutes.

This delegation of authority has been in effect since April 29, 2024, as initially authorized by Mr. Mario Girard, former President and CEO of the Québec Port Authority. It was renewed by Ms. Olga Farman, current President and CEO.

Privacy Act

8(2) <i>j</i>)	Disclose personal information for research purposes.
8(2) <i>m</i>)	Disclose personal information in the interest of the public or a person.
8(4)	Retain a copy of requests received under paragraph 8(2)(e) and the documents that were transmitted.
8(5)	Notify the Privacy Commissioner of any disclosure of personal information under paragraph 8(2)(m).
9(1)	Retain a record of use.
9(4)	Notify the Privacy Commissioner of consistent uses and update the index accordingly.
10	Include personal information in personal information banks.
14	Respond to requests for access to personal information within 30 days of receiving them, and give access to the information or notify the applicant otherwise.
15	Extend the time limit permitted to respond to a request for access.
17(2) <i>b</i>)	Determine whether it is necessary to have the requested information translated.
17(3) <i>b</i>)	Alternative format.
18(2)	As necessary, refuse to disclose personal information contained in an exempt bank.

19(1)	Refuse to disclose personal information that was obtained in confidence from another government.
19(2)	As necessary, disclose personal information requested under subsection 19(1) if the government from which the information was obtained consents to the disclosure or makes the information public.
20	As necessary, refuse to disclose information the disclosure of which could reasonably be expected to be injurious to the conduct of federal-provincial affairs.
21	As necessary, refuse to disclose information the disclosure of which could reasonably be expected to be injurious to the conduct of international affairs or defence.
22	As necessary, refuse to disclose information prepared by an investigative body or information the disclosure of which could reasonably be expected to be injurious to the enforcement of any law or the security of penal institutions.
22.1(1)	The Privacy Commissioner shall refuse to disclose any personal information requested that was obtained or created by the Commissioner or on the Commissioner's behalf in the course of an investigation. [Applies only to the Privacy Commissioner.]
22.2	The Public Sector Integrity Commissioner shall refuse to disclose any personal information requested that was obtained or created by the Commissioner or on the Commissioner's behalf in the course of an investigation into a disclosure made under the <i>Public Servants Disclosure Protection Act</i> or an investigation commenced under section 33 of that Act. [Applies only to the Public Sector Integrity Commissioner.]
22.3	Refuse to disclose personal information requested that was created for the purpose of making a disclosure under the <i>Public Servants Disclosure Protection Act</i> or in the course of an investigation into a disclosure under that Act.
23	As necessary, refuse to disclose information prepared by an investigative body for the purpose of determining whether to grant security clearances.
24	As necessary, refuse to disclose information that was collected by the Correctional Service of Canada or the Parole Board of Canada while the individual who made the request was under sentence for an offence, if the situation corresponds to what is provided for in this section.
25	As necessary, refuse to disclose information the disclosure of which could reasonably be expected to threaten the safety of individuals.
26	As necessary, refuse to disclose information about an individual other than the individual who made the request, and refuse to disclose such information where the disclosure is prohibited under section 8.

27	As necessary, refuse to disclose information that is subject to solicitor-client privilege.
28	As necessary, refuse to disclose information that relates to the physical or mental health of the individual who requested it where the examination of the information by the individual would be contrary to the best interests of the individual.
31	Receive notice from the Privacy Commissioner of the intention to carry out an investigation.
33(2)	In the course of an investigation, have an opportunity to make representations to the Privacy Commissioner.
35(1)	Receive a report from the Privacy Commissioner containing the findings of the investigation, and give notice to the Commissioner of any action taken.
35(4)	Give a complainant access to personal information after giving notice to the Privacy Commissioner that access will be given, in accordance with paragraph 35(1)(b).
36(3)	Receive the Privacy Commissioner's report containing the findings of an investigation of an exempt bank.
37(3)	Receive the Privacy Commissioner's report presenting the findings of the audit of an observation.
51(2)b)	Request that hearings pertaining to the cases described in section 51 be heard and determined in the National Capital Region.
51(3)	Request and have the opportunity to make representations during hearings pertaining to the cases described in section 51.
72(1)	Prepare an annual report to Parliament.
77	Fulfill the responsibilities that are conferred upon the head of an institution under section 77 of the Act and are not mentioned above.

Privacy Regulations

9	Provide reasonable facilities and set a time for the examination of personal information.
11(2)	Provide notification that the requested corrections have been made.

11(4)	Provide notification that the requested corrections were refused.
13(1)	As necessary, authorize the disclosure of an individual's personal information relating to their physical or mental health to a duly qualified medical practitioner or psychologist in order that the practitioner may provide an opinion as to whether disclosure of the information would be contrary to the best interests of the individual.
14	As necessary, disclose to an individual personal information relating to their physical or mental health in the presence of a duly qualified medical practitioner or psychologist.

Access to Information Act

4(2.1)	Make every reasonable effort to assist people making requests for access to information, respond to their questions accurately and completely, and provide timely access to documents in the format requested.
7a)	Notify the person who made the request for access.
7b)	Authorize access to the record.
8(1)	Transfer the request to another institution.
9	Extend the time limit.
11(2), (3), (4), (5), (6)	Additional fees.
12(2)	Language of access to information.
12(3)	Access to information in an alternative format.
13	Exemptions – Information obtained in confidence.
14	Exemptions – Federal-provincial affairs.
15	Exemptions – International affairs and defence.
16	Exemptions – Law enforcement and investigations.
16.1	Exemptions – Records relating to investigations, examinations and audits conducted by the Auditor General, the Commissioner of Official Languages, the Information Commissioner and the Privacy Commissioner.

16.2	Exemptions – Records relating to investigations conducted by the Commissioner of Lobbying.
16.3	Exemptions – Records relating to investigations and examinations conducted in accordance with the <i>Canada Elections Act</i> .
16.4	Exemptions – Records relating to investigations conducted by Public Sector Integrity Commissioner.
16.5	Exemptions – Records relating to the disclosure of information under the <i>Public Servants Disclosure Protection Act</i> .
17	Exemptions – Safety of individuals.
18	Exemptions – Economic interests of Canada.
18.1	Exemptions – Economic interests of the Canada Post Corporation, Export Development Canada, the Public Sector Pension Investment Board, and VIA Rail Canada Inc.
19	Exemptions – Personal information.
20	Exemptions – Third party information.
20.1	Exemptions – Third party information obtained by the Public Sector Pension Investment Board.
20.2	Exemptions – Third party information obtained by the Canada Pension Plan Investment Board.
20.4	Exemptions – Contracts of performing artists or the identity of anonymous donors of the National Arts Centre Corporation.
21	Exemptions – Operations of government.
22	Exemptions – Auditing procedures.
22.1	Exemptions – Audit working papers and draft audit reports.
23	Exemptions – Solicitor-client privilege.
24	Exemptions – Statutory prohibitions.

25	Severability.
26	Exemptions – Information to be published.
27(1), (4)	Notice to third parties.
28(1), (2), (4)	Notice to third parties.
29(1)	Disclosure of information on the recommendation of the Information Commissioner.
33	Advise the Information Commissioner of the involvement of a third party.
35(2)	Right to make representations.
37(4)	Access to be given to a complainant.
43(1)	Notice to third parties (application for review by the Federal Court).
44(2)	Notice to the person who requested the record (application for review by the Federal Court, presented by a third party).
52(2), (3)	Special rules for hearings.
71(1) (2)	Exclusion of exempt information from manuals.
72	Prepare an annual report to Parliament.
77	Responsibilities that are conferred upon the head of an institution under section 77 of the Act and are not mentioned above.

[Access to Information Regulations'](#)

6(1)	Transfer a request.
7(2)	Fees relating to search and preparation.
7(3)	Fees relating to production and programming.
8	Give access to records.
8.1	Limitations in respect of format.

Signed in Québec, Province of Québec, on this 29th day of April 2024.



Mario Girard

President and CEO

Signed in Québec, Province of Québec, on this 13th day of August 2026.



Olga Farman

President and CEO

APPENDIX “B”

Proactive Publication Requirements Table

Proactive Publication Requirements Table

Legislative Requirement	Section of ATIA	Publication Timeline	Does requirement apply to your institution? (Y/N)	Internal group(s) or position(s) responsible for fulfilling requirement	% of proactive publication requirements published within legislated timelines ¹	Link to web page where published
Apply to all Government Institutions as defined in section 3 of the <i>Access to Information Act</i>						
Travel Expenses	82	Within 30 days after the end of the month of reimbursement	Yes	Senior management group	60 % ²	Open Government Platform
Hospitality Expenses	83	Within 30 days after the end of the month of reimbursement	Yes	Senior Management group	60% ³	Open Government Platform
Reports tabled in Parliament	84	Within 30 days after tabling	Yes	SLE (Senior manager or employee)	100 %	Reports tabled in Parliament

¹ For the purposes of counting proactive publication requirements, monthly or quarterly reports are considered a single publication.

² The Administration aims to comply with the 30-day time limit to the greatest extent possible. However, depending on the availability of information at the time of the internal collection process, this period may be extended.

³ Idem.

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	No			
Q4: Within 60 days after the quarter	No	Q4: Within 60 days after the quarter				
Legislative Requirement	Section of ATIA	Publication Timeline	Does requirement apply to your institution? (Y/N)	Internal group(s) or position(s) responsible for fulfilling requirement	% of proactive publication requirements published within legislated timelines*	Link to web page where published**
Grants and Contributions over \$25,000	87	Within 30 days after the quarter	No			
Packages of briefing materials prepared for new or incoming deputy heads or equivalent	88(a)	Within 120 days after appointment	No			
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	No			

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	No			
Apply to government institutions that are departments named in Schedule I to the <i>Financial Administration Act</i> or portions of the core public administration named in Schedule IV of that Act (i.e. government institutions for which the Treasury Board is the employer)						
Reclassification of positions	85	Within 30 days after the quarter	No			
Legislative Requirement	Section of ATIA	Publication Timeline	Does requirement apply to your institution? (Y/N)	Internal group(s) or position(s) responsible for fulfilling requirement	% of proactive publication requirements published within legislated timelines*	Link to web page where published
Ministers' Offices (therefore apply to any institution that performs proactive publication on behalf of a Minister's Office)						
Packages of briefing materials prepared by a government institution for new or incoming ministers	74(a)	Within 120 days after appointment	No			
Titles and reference numbers of memoranda prepared by a government institution for the minister, that is	74(b)	Within 30 days after the end of the month received	No			

received by their office						
Package of question period notes prepared by a government institution for the minister and in use on the last sitting day of the House of Commons in June and December	74(c)	Within 30 days after last sitting day of the House of Commons in June and December	No			
Packages of briefing materials prepared by a government institution for a minister's appearance before a committee of Parliament	74(d)	Within 120 days after appearance	No			
Travel Expenses	75	Within 30 days after the end of the month of reimbursement	No			
Hospitality Expenses	76	Within 30 days after the end of the month of reimbursement	No			

Contracts over \$10,000	77	Q1-3: Within 30 days after the quarter / Q4: Within 60 days after the quarter	No			
Ministers' Offices Expenses / Note: This consolidated report is currently published by TBS on behalf of all institutions.	78	Within 120 days after the fiscal year	No			