

Annual Report to Parliament on the *Access to Information Act* 2025-2026

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Annual Report on CCC's Administration of the Access to Information Act

Introduction

The *Access to Information Act* (ATIA), enacted in 1983 and amended in 2019, provides individuals in Canada with a right of access to records under the control of federal government institutions. The principles encompassed by the ATIA are that government information should be available to the public, that exceptions to the right of access should be limited and specific, and that decisions on the disclosure of information should be reviewed independently of government.

The ATIA is intended to complement existing procedures for obtaining government information and is not to limit in any way the type of information that is normally available to the public, thereby denoting the importance of informal access and proactive disclosure.

This report is prepared and tabled in Parliament in accordance with section 94 of the *Access to Information Act.*

The Canadian Commercial Corporation (CCC) is a federal Crown corporation accountable to the Parliament of Canada through the Minister of International Trade. CCC's mandate is to facilitate the export of Canadian goods and services and act as Canada's international contracting and procurement agency. The institution did not have any wholly owned subsidiaries at any time during the reporting period.

One of the Corporation's primary activities involves the establishment of government-to-government contracts with foreign government buyers to provide goods and services available for export from Canada. CCC then enters into contracts with Canadian exporters to fulfill the requirements of the government-to-government contracts. The procurement and contracting services CCC provides for the benefit of Canadian exporters allows them to access markets where risk, transparency and competitiveness require a government-to-government arrangement. While CCC is actively engaged in the aerospace, defence, security and infrastructure sectors, it also supports emerging and developing export markets where foreign governments may require additional capacity to undertake complex and timely projects.

CCC also plays an important role in administering the Canada-US Defence Production Sharing Agreement (DPSA), which allows Canadian exporters to compete for procurement opportunities with the US Department of Defense on a level playing field with US-based companies. The Corporation also procures goods and services on behalf of other federal government institutions to assist the Government of Canada in delivering in-kind aid contributions worldwide.

Organizational Structure

The responsibilities under the *Access to Information Act* are fulfilled by the Corporation's Legal Services. In the 2025-2026 reporting period, the Access to Information and Privacy (ATIP) Office was managed by Legal Counsel with support from an ATIP consultant. The office was responsible for processing requests

for information, preparing internal and external reports, developing and reviewing internal policies and procedures, providing training and advice, and ensuring that CCC is compliant with the ATIA, its regulations and related policy instruments. The Legal Counsel responsible for ATIP reported to the Vice President, Legal Services, General Counsel and Corporate Secretary, who has delegated authority under the ATIA and is also designated as CCC's ATIP Coordinator for the purpose of receiving requests under the *ATIA*.

Proactive publication of travel and hospitality expenses (ATIA, sections 82 and 83) was fulfilled by the Travel Management Analyst. The proactive publication of reports tabled in Parliament pursuant to section 84 of the ATIA is fulfilled by CCC's Corporate Services. For a breakdown of the groups and positions responsible for meeting each applicable proactive publication requirement under Part 2 of the ATIA.

CCC was not a party to any service agreements under section 96 of the *Access to Information Act* during this reporting period.

Delegation Order

The head of CCC, as defined by the ATIA, is the President and Chief Executive Officer. Pursuant to section 95 of the ATIA, the President may delegate all or some of their authority under the ATIA.

By way of a Delegation Order, the President delegated all of their powers, duties and functions under the ATIA to the Vice-President, Legal Services, General Counsel and Corporate Secretary.

A copy of the Delegation Order is attached at Annex A.

Performance Overview

The following chart provides an overview of key data about formal requests, as reflected in the 2025-2026 Statistical Report, and provides information about multi-year trends. The institution saw an increase in requests received under the ATIA compared to the previous fiscal year. CCC responded to 90% of requests within the legislated timelines. While CCC's performance is measured in terms of the percentage of requests completed within the legislated time limit, the volume and complexity of individual requests can greatly impact those results.

Formal Requests	This year (FY 2025-2026)	Trend	Last year (FY 2024-2025)
Number of requests received	7	↑	6
Number of requests closed	10	↑	4
Total number of pages processed	399	– ↑	96
Percentage completed within time limit	90%	–	100%

CCC had three outstanding requests from the previous reporting period and received seven new requests

under the ATIA, for a total workload of 10 requests. All 10 requests were closed during the reporting period.

Of the 10 completed requests, one request (10%) was disclosed in full, seven requests (70%) were disclosed in part, one request (10%) resulted in no responsive records, and one request (10%) was abandoned. Of the completed requests, two were completed within 16 to 30 days, three within 31 to 60 days, two within 61 to 120 days, one within 121 to 180 days, and two within 181 to 365 days.

CCC completed 90% of requests within legislated timelines. One request was completed beyond the legislated timeline by fewer than 15 days following the expiry of an extension that had been taken under the Act due to consultations with other government departments.

During the reporting period, CCC took six extensions under section 9 of the ATIA. Two extensions were taken pursuant to paragraph 9(1)(a) due to interference with operations or workload considerations, while four extensions were taken pursuant to paragraph 9(1)(c) to allow for third-party consultations.

As of the last day of the reporting period, CCC had no active access to information requests and no requests carried over to the next fiscal year. CCC also had no active complaints before the Office of the Information Commissioner as of March 31, 2026.

The following table provides data on consultations received from other Government of Canada institutions and other government organizations. During the reporting period, CCC received eight consultation requests, compared to five during the previous reporting period. Including two consultations carried over from the previous fiscal year, CCC completed 10 consultation requests involving 511 pages. All consultations were completed within negotiated timelines, and no consultations were carried over to the next reporting period.

Consultations from other Institutions	This year (FY 2025-2026)	Trend	Last year (FY 2024-2025)
Number of consultations received	8	↑	5
Total number of pages consulted	511	↑	388
Average completion time in days	42	↓	74

* No data available

Training and Awareness

All employees undertake mandatory annual training on CCC's Code of Conduct and Business Ethics, which includes a section on confidentiality, disclosure of information and transparency. There is a summary of employee ATIP obligations on CCC's internal portal as a resource for employees.

During the reporting period, CCC shared guidance through its internal portal that was circulated to all employees for awareness. The guidance provided background on key access to information and records management responsibilities, including the appropriate use of instant messaging and mobile communications, the use of corporate devices and applications for business purposes, the requirement to conduct fulsome searches for responsive records, and the role of employees in supporting the review of records for potential exemptions under the *Access to Information Act*.

Policies, Guidelines, and Procedures

During the reporting period, CCC did not implement any new policies, guidelines, or procedures pertaining to access to information or proactive publication requirements under Part 2 of the ATIA.

Initiatives and Projects

CCC implemented a *Transparency and Disclosure Policy* in 2019 that designates the proactive disclosure of information pertaining to its business, and continues to publish information about its responsible business conduct policies, transactions, business events, disclosure of wrongdoing, and diversity and inclusion. The information can be found on CCC's Transparency and Disclosure webpage. CCC did not implement any new initiatives or projects during the reporting period.

Key Issues and Complaints

CCC did not have any active complaints, nor were any issues raised during the reporting period.

Proactive Publication

CCC is considered a government institution for the purpose of Part 2 of the *Access to Information Act*, and as such, is subject to the following proactive publication requirements:

Proactive Publication Requirements Table

Legislative Requirement	**Section of ATIA**	**Publication Timeline**	**Does requirement apply to your institution? (Y/N)**	**Internal group(s) or positions(s) responsible for fulfilling requirement**	**% of proactive publication requirements published within legislated timelines***	**Link to web page where published****
Apply to all Government Institutions as defined in section 3 of the *Access to Information Act*						
Travel Expenses	82	Within 30 days after the end of the	Y	Financial Services	0%	https://www.ccc.ca/en/about/t

		month of reimbursement				ravel-and-hospitality/
Hospitality Expenses	83	Within 30 days after the end of the month of reimbursement	Y	Financial Services	0%	https://www.ccc.ca/en/about/travel-and-hospitality/
Reports tabled in Parliament	84	Within 30 days after tabling	Y	Communications Services	100%	https://www.ccc.ca/en/about/transparency-and-disclosure/

CCC posted its travel and hospitality expenses on a quarterly cadence rather than the required monthly schedule.

Monitoring Compliance

CCC did not monitor the time taken to process access to information requests during the reporting period and the information provided in section 11.2 of the statistical report is based on best estimates. CCC uses an excel sheet to track the processing of requests for administrative and statistical purposes. A summary of active and closed requests and any outstanding complaints are reported to the Board of Directors on a quarterly basis. Legal Services reviews contracts to ensure that any agreements pertaining to information sharing include provisions that comply with legislative ATIA requirements. The expense reports for travel and hospitality disclosure are approved by the Manager of Finance Operations and occasionally reviewed by Internal Audit.

Annex A: Delegation Order

Annex A

CCC
Canadian Commercial Corporation
Corporation Commerciale Canadienne

Delegation Order

The President and Chief Executive Officer of the Canadian Commercial Corporation, pursuant to section 95 of the *Access to Information Act* and section 73 of the *Privacy Act*, hereby designates the persons holding the positions set out in the schedule hereto, or the persons occupying on an acting basis those positions, to exercise the powers, duties and functions of the President and Chief Executive Officer as the head of the Canadian Commercial Corporation, under the provisions of the Act and related regulations set out in the schedule opposite each position. This designation replaces all previous delegation orders.

Dated, at the City of Ottawa, this _14th ___ day of May, 2021.

Arrêté de délégation

En vertu de l'article 95 de la *Loi sur l'accès à l'information* et de l'article 73 de la *Loi sur la protection des renseignements personnels*, le Président et Chef de la direction de la Corporation Commerciale Canadienne délègue aux titulaires des postes mentionnés à l'annexe ci-après, ainsi qu'aux personnes occupant à titre intérimaire lesdits postes, les attributions dont il est, en qualité de responsable de la Corporation Commerciale Canadienne, investi par les dispositions de la Loi ou de son règlement mentionnées dans l'annexe en regard de chaque poste. Le présent document remplace et annule tout arrêté antérieur.

Fait à la ville d'Ottawa, le __14___ jour de mai 2021.

Bobby Kwon
President and Chief Executive Officer / Président et Chef de la direction

Collaborative, Credible, Competitive • Collaboration, Crédibilité, Compétitivité

Canada

CCC
Canadian Commercial Corporation
Corporation Commerciale Canadienne

Schedule / Annexe

Position / Poste	*Access to Information Act* and Regulations / *Loi sur l'accès à l'information et Règlement*	*Privacy Act* and Regulations / *Loi sur la protection des renseignements personnels et Règlement*
Vice-President Legal Services, General Counsel and Corporate Secretary / Vice-président Services juridiques, avocat générale et secrétaire de la Corporation	Full authority / Autorité absolue	Full authority / Autorité absolue
Law Clerk / Adjointe Judiciaire	Sections 4(2.1), 9, 11(2) and 27 of the *Access to Information Act* / L'articles 4(2.1), 9, 11(2) and 27 de la *Loi sur l'accès à l'information*	Section 15(a) of the *Privacy Act* / L'article 15(a) de la *Loi sur la protection des renseignements personnels*