

*ACCESS TO INFORMATION AND PROTECTION OF PRIVACY ACT, 2015*  
*STATUTORY REVIEW 2020*  
*RECOMMENDATIONS*

**THE ATIPP COORDINATOR**

**RECOMMENDATION**

**Administrative**

- That the head of each public body provide each designated ATIPP coordinator with a formal mandate letter.
- That the Classification and Organization Design section of Treasury Board develop a job description and classification for the position of full-time coordinator.
- That each coordinator sign an oath/affirmation of confidentiality addressing their particular obligations as coordinators.

**THE APPLICANT**

**RECOMMENDATION**

That the *Act* be amended to:

- Require the full name and contact information of the applicant for all requests.  
[Appendix K, s. 11(2)(a.1)]

- Make it clear that the anonymity of an applicant continues to apply following the final response to the applicant. [Appendix K, s. 12(4)]
- Provide that within 5 days of receiving a request, public bodies may ask for identity verification (for personal information requests) or clarification of the request, and applicants must respond within 30 days or their request will be considered abandoned. [Appendix K, s. 11.1]
- Stop the clock on time limits for final responses while waiting for an applicant's response to a request for clarification or identity verification. [Appendix K, s. 11.1(3)]

## THE REQUEST PROCESS

Fees and Costs

## RECOMMENDATION

That the *Act* be amended to:

- Allow public bodies to charge the cost of time spent identifying, locating, retrieving, reviewing, severing and redacting records for individual requests in excess of 35 hours, subject to the existing estimate, waiver, review and other provisions of section 26. [Appendix K, s. 8(3), s. 25]
- Allow public bodies to charge fees per page for physical reproduction of records in excess of 100 pages. [Appendix K, s. 25(1)(b)]

### Administrative:

- That the responsible minister revise the current cost schedule to reflect the recommendations in this report.

Record Format

**RECOMMENDATION**

- That the *Act* be amended to specify that when a record exists in a format specifically requested, a public body should provide it in that format when it is reasonably practicable. Otherwise, it can be provided in a format either agreed upon with the applicant or that does not materially change the content. (Any record provided, regardless of format, remains subject to redaction in accordance with the exceptions in the *Act*.) [Appendix K, s. 20(6) and (7)]

**Administrative**

- That the OCIO and the ATIPP Office make available to the smaller public bodies basic training and information responding to requests for a record in a particular format.

Transfer of Requests

**RECOMMENDATION**

- That the *Act* be amended to expand the window for transferring requests between public bodies to 10 days. [Appendix K, s. 14(1)]

**Administrative:**

- That concurrently with the transfer of an access request to another public body, the transferring coordinator notify the ATIPP Office of the transfer.

Advisory Response

## RECOMMENDATION

- That the *Act* be amended to remove the requirement for advisory responses. [Appendix K, s. 15]

### **Administrative:**

- That acknowledgement letters be automatically generated and sent to applicants when a coordinator confirms receipt of a request.

Disregarding a Request

## RECOMMENDATION

That the *Act* be amended to:

- Extend the period in which to apply for a disregard to 10 days. [Appendix K, s. 21(1)]
- Remove the ability to apply to disregard a request on the basis of unreasonable interference with the public body. [Appendix K, s. 21(1)(a)]
- Stop the clock on time limits for final responses while waiting for the commissioner's approval of a disregard application. [Appendix K, s. 21(3)]
- Allow the head of a public body to approve disregard applications in cases of requests for information otherwise accessible to any applicant and requests from unidentifiable applicants. The commissioner must be notified in writing. [Appendix K, s. 5(2)(a), s. 21.1]

### **Administrative:**

- That where the head of a public body disregards a request, the coordinator of the public body notify the ATIPP Office of the disregard and reasons therefor.

## Vexatious Applicants

## RECOMMENDATION

That the *Act* be amended to:

- Allow the head of a public body to ask the commissioner to declare an applicant to be a vexatious applicant for a period of time determined by the commissioner. [Appendix K, s. 21.2]
- Allow an applicant to appeal a vexatious applicant declaration to the court and allow the court to make an appropriate order. [Appendix K, s. 54.1, s. 60(4)]

## Time Limits and Extensions

## RECOMMENDATION

That the *Act* be amended to:

- Allow the head of a public body to approve, in specified circumstances, an extension to the time limit for a response of up to 10 days based on a written recommendation from the coordinator. The commissioner must be notified in writing. [Appendix K, s. 23.1]
- Allow the head of a public body and an applicant to agree to an extension to the time limit for a response. The commissioner must be notified in writing. [Appendix K, s. 23.1]

**Administrative:**

- That where the head of a public body approves an extension, the coordinator notify the ATIPP Office of the reasons for and length of the extension.

## INFORMATION MANAGEMENT AND INFORMATION TECHNOLOGY ISSUES

### RECOMMENDATIONS

#### Administrative:

- That OCIO and the ATIPP Office conduct a review of the HP Records Manager and Online Tracking System with a view to system integration and/or a meaningful reduction of effort arising from the duplication of systems.
- That OCIO, the ATIPP Office and relevant department(s) conduct a review of the Online Request System with a view to making the online system available to such other public bodies who may wish to avail of it.
- That OCIO and the ATIPP Office investigate and take steps as are appropriate to provide coordinators with pre-authorized, continuous access to frequently searched email accounts.
- That the Government Records Committee constituted under the *Management of Information Act* review its guidelines and policies with respect to the identification and disposal of transitory emails.
- That the head of each public body subject to the *Management of Information Act* ensure that their record management system properly reflects the approved guidelines for transitory records and that the identification and appropriate disposal of transitory emails is carried out accordingly.
- That each public body not subject to the *Management of Information Act* review the content of and compliance with any existing guidelines for the disposal of transitory emails, or develop guidelines forthwith.

### EXCEPTIONS TO ACCESS

Cabinet Confidences

## RECOMMENDATION

- That the *Act* be amended to remove “decisions” from the definition of “Cabinet record”. [Appendix K, s. 27(1)(e)]

Local Public Body Confidences

## RECOMMENDATION

That the *Act* be amended to:

- Make it clear that privileged meetings of a municipal council committee have the same exceptions to disclosure as privileged meetings of the council. [Appendix K, s. 28(1)(c)]
- Remove regulation-making authority relating to privileged meetings of a local public body or committee. [Appendix K, s. 116(f)]

Solicitor-Client Privilege

## RECOMMENDATION

- That the *Act* be amended to make it clear that the OIPC can require the production to it of records over which solicitor-client privilege is claimed when production is determined to be absolutely necessary to assess the claim for privilege, but no production may be ordered when the privilege relates to advice given in respect of an ATIPP matter. [Appendix K, s. 97]
- That the *Act* be amended to provide that the commissioner’s right of entry and examination and copying of a record does not extend to a record over which solicitor-client privilege is claimed. [Appendix K, s. 98]

**Suggestion:**

- That public bodies support claims of solicitor-client privilege with a solicitor’s affidavit and a listing and description of each document.

Settlement Privilege

**RECOMMENDATION**

- That the *Act* be amended to include settlement privilege in subsection 30(2). [Appendix K, s. 30(2)]

Confidential Evaluations

- That the *Act* be amended to include an exception to disclosure of the confidential assessment of research carried out under the authority of the Health Research Ethics Authority. [Appendix K, s. 32(f)]

Workplace Investigations

**RECOMMENDATION**

That the *Act* be amended to:

- Extend the definition of “workplace investigation” to include others holding a position within a public body. [Appendix K, s. 33(1)(c)(i) and (iii)]
- Provide a mandatory exception to access for all relevant information created or gathered for the purpose of a workplace investigation, but allow discretionary disclosure of the final report of a workplace investigation to a complainant or respondent, or otherwise where in the public interest. [Appendix K, s. 33(2) and (3)]
- Require the head of a public body to disclose to an applicant a statement provided by the applicant for the purpose of a workplace investigation. [Appendix K, s. 33(4)]

- Remove the *House of Assembly Act* and *House of Assembly Accountability, Integrity and Administration Act* inquiries from s. 33. [Appendix, s. 33(1.1)]
- Allow the head of a public body to refuse access to information relating to workplace conduct provided in confidence, including opinions about another individual. [Appendix K, s. 33(5)]

#### Intergovernmental Relations

### RECOMMENDATION

- That the *Act* be amended to extend the intergovernmental relations exception to all Indigenous self-governing bodies. [Appendix K, s. 2(1.1), s. 34(1)(a)(v), s. 34(1)(b)]

#### Conservation

### RECOMMENDATION

- That the *Act* be amended to extend the harm-based exception to information about species and populations which the head of a public body has reasonable grounds to believe are in need of protection. [Appendix K, s. 36(b)]

#### Third Party Commercial Interests

### RECOMMENDATION

That the *Act* be amended to:

- Remove the requirement that information has to have been supplied in confidence from the exception for disclosure harmful to third parties' business interests. [Appendix K, s. 39]
- Provide a mandatory exception for trade secrets. [Appendix K, s. 39(1)(a)]

- Provide a 20-year sunset clause on third-party business information. [Appendix K, s. 39(4)]
- Make the exception for disclosure harmful to third parties' business interests subject to the public interest override. [Appendix K, s. 9(2)]

Third Party Notification

RECOMMENDATION

That the *Act* be amended to:

- Allow public bodies to consult with third parties while considering requests for information the release of which might be harmful to their interests. [Appendix K, s. 19(1)]
- Require a third party who files a complaint or an appeal to provide a copy of the complaint or notice of appeal to the public body. [Appendix K, s. 19(5)(c)]

Information Technology Security

RECOMMENDATION

- That the *Act* be amended to provide a discretionary harm-based exception to access for information technology security information. [Appendix K, s. 31.1]

**Administrative**

- That the OCIO and the ATIPP Office provide to the smaller public bodies basic information and guidance on the types of information technology security information and the records which may contain such information.

Testing Procedures and Audits

**RECOMMENDATION**

- That the *Act* be amended to provide a discretionary harm-based exception to access for test-related information. [Appendix K, s. 5(1)(f), s. 41.1]

**PUBLIC INTEREST OVERRIDE**

**RECOMMENDATION**

- That the *Act* be amended to extend the public interest override to all discretionary exceptions, to third party commercial interests, and to the final report of a workplace investigation. [Appendix K, s. 9, s. 33(3)(b)]

**SUNSET CLAUSES**

**RECOMMENDATION**

- That the *Act* be amended to replace the 50-year sunset clause on archived records in sections 38 and 39 with a 20-year sunset clause with no reference to archived records. [Appendix K, s. 38(2), s. 39(4)]

**SUBMISSIONS OF THE NEWFOUNDLAND AND LABRADOR VETERINARY MEDICAL ASSOCIATION**

### RECOMMENDATION

- That the *Act* be amended to exclude treatment records created by a public body veterinarian for fee for service treatment that would not otherwise be provided by a public body veterinarian if a private veterinarian were available. [Appendix K, s. 5(1)(n)]

### SUBMISSIONS OF THE OFFICE OF THE SPEAKER OF THE HOUSE OF ASSEMBLY

The “Next Sitting” of the House of Assembly

### RECOMMENDATION

That the *Act* be amended to:

- Provide the Lieutenant-Governor-in-Council with the authority to recommend additions to Schedule B. [Appendix K, s. 4]
- Require the Selection Committee to provide no more than three candidate names to the Speaker when choosing a new commissioner. [Appendix K, s. 85(5)]
- Give the formal responsibility for bringing forward the resolution naming a new commissioner to the government House Leader. [Appendix K, s. 85(6) and (7)]

#### Suggestions:

- That any disclosure by the Speaker of the names of the recommended candidates during the consultation process, and any subsequent sharing of those names by the party leaders with their members, be on the clear understanding and expectation of confidentiality.

- That consideration be given to including a definition of “sitting of the House of Assembly” when used in the legislation respecting statutory offices, including *ATIPPA, 2015*.

## SUBMISSIONS OF THE STATUTORY OFFICES OF THE HOUSE OF ASSEMBLY

Office of the Auditor General

### RECOMMENDATION

That the *Act* be amended to:

- Make clear that the exception to disclosure for statutory office records extends to those offices’ audit functions. [Appendix K, s. 41(c)]
- Make the Office of the Auditor General subject to *ATIPPA, 2015*. [Appendix K, s. 2(x)(v.1)]

## OFFICE OF THE INFORMATION AND PRIVACY COMMISSIONER

### RECOMMENDATION

- That the *Act* be amended to allow the commissioner to designate a person who will assume their powers and duties in the event of their absence or a vacancy in the office of commissioner. [Appendix K, s. 103.1]

The Office of the Information and Privacy Commissioner as a Public Body

### RECOMMENDATION

- That the *Act* be amended to provide that where the OIPC is responding to a request in its capacity as a public body, procedural or administrative matters that would otherwise be referred to the OIPC be referred to the Office of the

Citizens' Representative and that matters requiring a level of adjudication be referred to the Supreme Court. [Appendix K, s. 51.1]

Compellability of OIPC Personnel as Witnesses

#### RECOMMENDATION

- That the *Act* be amended to remove the non-compellability of OIPC personnel as witnesses in proceedings involving an offence under the Act or a charge of perjury. [Appendix K, s. 99(3)]

OIPC Investigations and Section 8.1 of the *Evidence Act*

#### RECOMMENDATION

- That the *Act* be amended to repeal section 101. [Appendix K, s. 101]

### MUNICIPALITIES

#### RECOMMENDATION

That the *Act* be amended to:

- Provide that only one person can be designated as the head of a local public body. [Appendix K, s. 109(1), (2)(a), (3) and (4)]
- Allow local public bodies to designate a person not on staff as a coordinator or as the head of the public body under exceptional circumstances, when approved by the commissioner. [Appendix K, s. 110(3) and (4)]

**Administrative:**

- That Government develop a cost-reimbursement process whereby municipalities established under the Municipalities Act, 1999 may be reimbursed for all or a portion of the marginal costs incurred in responding to ATIPP requests.
- That Government establish a Municipality ATIPP Team to determine and review as required the resources reasonably needed by municipalities to administer ATIPP in each municipality.

## RECOMMENDATIONS 4 AND 16 OF THE MUSKRAT FALLS INQUIRY

### RECOMMENDATION

That the *Act* be amended to:

- Provide that a public inquiry is not a public body for ATIPP purposes. [Appendix K, s. 2(x)(x)]
- Include s. 28 of the *Public Inquiries Act, 2006* in Schedule A. [Appendix K, Schedule A (o.1)]

**Suggestion:** That government consider amending the *Energy Corporation Act* to provide that the corporation is required to provide to the responsible minister such information as may be requested by the minister.

## PUBLICATION SCHEMES, INFORMATION DIRECTORIES AND PROACTIVE DISCLOSURE

Proactive Disclosure

### RECOMMENDATION

That the *Act* be amended to:

- Require the creation of publication schemes by all public bodies other than small municipalities and others exempted by regulation. [Appendix K, s. 111]
- Require public bodies other than local public bodies to develop and publish categories of records and information that will be published routinely. [Appendix K, s. 111.1]
- Provide that the categories for proactive disclosure will include ministerial briefing notes, executive travel expense reports, records presently listed in paragraphs 29(2)(b) to (k), and others specified by regulation. [Appendix K, s. 111.1(5)]
- Allow the commissioner to comment on and recommend improvements to publication schemes and proactive disclosure. [Appendix K, s. 95(1)(i)]
- Delay the coming into effect of the publication scheme and proactive disclosure provisions until January 1, 2023.

**Administrative:**

- That public bodies should complete a proposed publication scheme and submit it to the OIPC for review and comment prior to the requirement coming into force.

**PROTECTION OF PRIVACY**

**RECOMMENDATION**

- That the *Act* be amended to require a public body to develop and publish policies and procedures for the protection of personal information. [Appendix K, s. 72.2]

**RECOMMENDATION**

That the *Act* be amended to:

- Define “common or integrated program or service”. [Appendix K, s. 2(e.1)]
- Require non-departmental public bodies to prepare preliminary assessments and, if required, privacy impact assessments, with the option of submitting them to the commissioner for review and comment. [Appendix K, s. 2(w), s. 72.1]
- Specify that the commissioner has the authority to monitor compliance with the requirement to conduct privacy assessments and to make recommendations for improvement. [Appendix K, s. 95(1)(h)]

#### **Administrative:**

- That privacy impact assessments received by heads of non-departmental public bodies may optionally be also sent to the ATIPP Office for review and comment.

#### **Suggestions:**

- That smaller public bodies seek guidance from the ATIPP Office and the OIPC as needed when considering the privacy impacts of any program or service.
- That a public body developing a common or integrated program or service should consider both notifying the ATIPP Office at an early stage of the development of the program or service and also submitting the PIA to that office for its review and comment.

Information Sharing Agreements

## RECOMMENDATION

#### **Administrative:**

- That in the course of conducting a privacy impact assessment involving a common or integrated program or service, public bodies consider whether an information sharing agreement is reasonably required for the protection of personal information the disclosure of which may be permitted under paragraph 68(1)(u).

Artificial Intelligence

## RECOMMENDATION

That the *Act* be amended to:

- Define “automated decision system”. [Appendix K, s. 2(a.2)]
- Define “algorithmic impact assessments” and require that any public body planning to implement an automated decision system complete one and, if requested, provide it to the commissioner. [Appendix K, s. 2(a.1)]
- Require that public bodies notify the commissioner when developing a program or service using automated decision systems. [Appendix K, s. 95(1)(f) and (g)]
- Require public bodies to keep records of the decision-making processes of automated decision systems. [Appendix K, s. 72.3]
- Include monitoring and commenting on automated decision systems in the general powers and duties of the commissioner. [Appendix K, s. 72.3(4)]

## Privacy Breach Reporting

## RECOMMENDATION

- That the *Act* be amended to reflect consistency in the requirements to report a privacy breach to the commissioner and to the affected individual and to allow the head of a public body, on notification to the commissioner, to refrain from notifying the individual concerned if there is a risk of significant harm to another person. [Appendix K, s. 64]

**Administrative:**

- That all public bodies report privacy breaches to the ATIPP Office as well as to the OIPC.

## Prospective and Third Party Privacy Complaints

## RECOMMENDATION

That the *Act* be amended to:

- Allow complainants to file prospective complaints about privacy breaches. [Appendix K, s. 73(1) and (2)]
- Remove the requirement for individual consent to the filing of a privacy complaint. [Appendix K, s. 73(1) and (2)]

## Anonymity of Privacy Complaints

## RECOMMENDATION

- That the *Act* be amended to allow the commissioner to accept a privacy complaint from a person who wishes to remain anonymous, if their identity is not relevant to the investigation. [Appendix K, s. 73(6), (7) and (8)]

## POLITICAL PARTIES AND PERSONAL INFORMATION

## RECOMMENDATION

**Administrative:**

- That government proceed expeditiously with the development of a regulatory and oversight regime covering the collection, use and disclosure of personal information by registered political parties.

## ALUMNI ENGAGEMENT

### RECOMMENDATION

That the *Act* be amended to:

- Allow post-secondary educational bodies to use personal information in alumni records for outreach and engagement purposes. [Appendix K, s. 67]
- Allow alumni to request that their personal information cease to be used for outreach and engagement activities. [Appendix K, s. 67(2)(c)]

## COMPLAINTS, RECOMMENDATIONS AND APPEALS

Parties to a Complaint

### RECOMMENDATION

- That the *Act* be amended to provide that when a complaint is made regarding information withheld due to third party business interests, the third party is considered a party to the complaint. [Appendix K, s. 44(1.1)]

Complaint Investigation Process

### RECOMMENDATION

That the *Act* be amended to:

- Allow an additional five days for parties to a complaint to make representations to the commissioner and for the initial informal resolution process. [Appendix K, s. 44(2) and (4)]

- Reduce the commissioner’s optional extension to the informal resolution process by five days. [Appendix K, s. 44(5)]

### Suggestions:

- If a complaint contains insufficient particulars to allow a public body to identify the circumstance in question and respond meaningfully, the OIPC should seek further particulars from the complainant. If no such particulars are forthcoming, the OIPC should consider refusing to investigate the complaint.
- The OIPC formally advise the complainant and the public body of the cessation of the informal resolution process.
- The OIPC advise the complainant and the public body no later than five days following the cessation of the informal process of the general conclusions of the OIPC with respect to the complaint and the likely recommendation(s).
- After being so notified, the complainant and the public body be given five days within which to provide the OIPC with a final written submission, should they so choose.

Extent of the Appeal Right

## RECOMMENDATION

That the *Act* be amended to:

- Allow a person to file a complaint for failure to comply with a obligation under the *Act*. [Appendix K, s. 42]
- Allow the commissioner to make recommendations that a public body take steps to comply with a legal obligation under the *Act* and delete the reference to “failure to act”. [Appendix K, s. 42(1) and (2)(a), s. 47(e), s. 52(1), (2)(a), and (3), s. 56(4)(b), s. 59(1), s. 83(1)]

- Allow the head of a public body to apply to court for a declaration that the public body is not required to comply with that recommendation. [Appendix K, s. 50(1)(c)]
- Allow the commissioner to file an order with the court directing the head of the public body to take steps to comply with an obligation under the *Act*. [Appendix K, s. 51(2)(c)]
- Allow an applicant or third party to commence an appeal in court of a public body's decision not to take steps to comply with an obligation under the *Act*. [Appendix K, s. 54(1) and (2)]
- Allow the court to make an order it considers appropriate should it determine that a public body has not complied with an obligation under the *Act*. [Appendix K, s. 54(1)(c), s. 60(1)(d)]
- Remove the option for the commissioner to recommend that a public body reconsider a decision. [Appendix K, s. 47(b)]

Deemed Acceptance and the Appeal Right

## RECOMMENDATION

That the *Act* be amended to:

- Provide that when the head of a public body has not responded to a recommendation of the commissioner and is thus considered to have complied with it, the commissioner will give written notice of this to the complainant, the public body, and any notified third parties. [Appendix K, s. 49(3) and (4), s. 54(2)]

The Court Process

## RECOMMENDATION

- That the Act be amended to provide that unless otherwise ordered, an appeal shall be subject to case management under Rule 18A.06 and the first step in the proceeding following the filing of the notice of appeal shall be a case management meeting. [Appendix K, s. 57]

Application to the Supreme Court for a Declaration

## RECOMMENDATION

- That the *Act* be amended to make clear that when a public body seeks a declaration by the court that it is not required to comply with a recommendation of the commissioner, it is by way of an *ex parte* application. [Appendix K, s. 50(2), s. 79(1)(a)]

## OTHER ISSUES

Whistleblower Protection

## RECOMMENDATION

**Suggestion:**

- That government consider whether or not any public body now subject to *ATIPPA, 2015*, subject to *PIDA*, should by regulation be considered a public body for *PIDA* purposes.

## SCHEDULE A

*Energy Corporation Act*, SNL 2007 C. E-11.01

## RECOMMENDATION

- That section 5.4 of the *Energy Corporation Act* be amended to allow the standard *ATIPPA* request, review, recommendation and declaration/appeal processes. [Appendix K]
- That *ATIPPA, 2015* be amended to extend the section 9 public interest override provision to section 5.4 of the *ECA*. [Appendix K, s. 9(2.1)]
- That the *Energy Corporation Act* be amended to limit the application of section 5.4 only to hydrocarbon-related information in Nalcor's custody. (Appendix K)

**Suggestion:** That government considering amending the *Energy Corporation Act* to provide that the corporation is required to provide to the responsible minister such information as may be requested by the minister.

*Evidence Act*, RSNL 1990, c. E-16 and *Patient Safety Act*, SNL 2017 c. P-3.01

## RECOMMENDATION

- That the *Act* be amended to section 8(1) of the *Evidence Act* from Schedule A. [Appendix K, Schedule A (f)]

*Fish Inspection Act*, RSNL 1990 c. F-12

## RECOMMENDATION

- That the *Act* be amended to remove section 5(1) of the *Fish Inspection Act* from Schedule A. [Appendix K, Schedule A (h)]

Fisheries Act, SNL 1995, c. F-12.1

## RECOMMENDATION

- That the *Act* be amended to remove section 4 of the *Fisheries Act* from Schedule A. [Appendix K, Schedule A (i)]

*Innovation and Business Investment Corporation Act*, DNL 2018 c. 1-7.1

## RECOMMENDATION

- That section 21 of the *Innovation and Business Investment Corporation Act* be amended to allow the standard *ATIPPA* request, review, recommendation and declaration/appeal processes. [Appendix K]

**Suggestion:** That government consider an amendment to *ATIPPA, 2015* to extend s. 9 public interest override provision to s. 21 of the *Innovation and Business Investment Corporation Act*. [Appendix K]

*Oil and Gas Corporation Act*, SNL 2019 c. O-6.1

## RECOMMENDATION

- That section 23 of the *Oil and Gas Corporation Act* be amended to allow the standard *ATIPPA* request, review, recommendation and declaration/appeal processes. [Appendix K]

**Suggestion:** That government consider an amendment to *ATIPPA, 2015* to extend the s. 9 public interest override provision to s. 23 of the *Oil and Gas Corporation Act*.

*Workplace Health, Safety and Compensation Act*, RSNL 1990 c. W-11

**RECOMMENDATION**

- That the *Act* be amended to remove section 18 of the *Workplace Health, Safety and Compensation Act* from Schedule A. [Appendix K, Schedule A (t)]

