Northern Pipeline Agency | Administration du pipe-line du Nord

Access to Information Act
Annual Report to Parliament 2025-2026

Northern Pipeline Agency

Canada

© His Majesty the King in Right of Canada, as represented by the Minister of Energy and Natural Resources, 2026

Cat. No. M176-8E-PDF
ISSN 2817-5433

This report is published separately in both official languages.

Aussi disponible en français sous le titre : Loi sur l’accès à l’information Rapport annuel au Parlement 2025-2026

Copies are available on the Northern Pipeline Agency website at:
https://northern-pipeline.canada.ca/reports-and-publications/northern-pipeline-agency-reports

Access to Information Act Annual Report to Parliament 2025-2026

Table of Contents

1. Introduction 1
2. Organizational Structure 2
3. Delegation Order 2
4. Performance 2025-2026 3
5. Training and Awareness 4
6. Policies, Guidelines, Procedures and Initiatives 4
7. Initiatives and Projects to Improve Access to Information 4
8. Summary of Key Issues and Actions Taken on Complaints 5
9. Proactive Publication under Part 2 of the ATIA 5
10. Monitoring Compliance 8
Annex A: Delegation Order 10

Access to Information Act Annual Report to Parliament 2025-2026

1. Introduction

This annual report describes how the Northern Pipeline Agency (NPA) met its responsibilities in administering the *Access to Information Act* during fiscal year 2025-2026.

The Access to Information Act

The *Access to Information Act* (ATIA) came into force on July 1, 1983, and further amended on June 21, 2019. The purpose of the *ATIA* is to enhance the accountability and transparency of federal institutions to promote an open and democratic society and to enable public debate on the conduct of those institutions.

Part 1 of the ATIA extends the present laws of Canada to provide a right of access to information in records under the control of a government institution in accordance with the principles that government information should be available to the public, that necessary exceptions to the right of access should be limited and specific, and that decisions about the disclosure of government information should be reviewed independently of government.

Part 2 of the ATIA sets out requirements for the proactive publication of information.

This report is prepared and tabled in accordance with section 20 of the *Service Fees Act* and section 94 of the ATIA, which requires that the head of every federal institution prepare and submit an annual report to Parliament on the administration of the Act in the institution during the fiscal year. It covers the period from April 1, 2025, to March 31, 2026.

The Northern Pipeline Agency

Description

The NPA was created with the proclamation of *the Northern Pipeline Act* in April 1978 to oversee planning and construction of the Canadian portion of the Alaska Highway Natural Gas Pipeline Project by the Foothills Group of Companies. The Minister of Energy and Natural Resources is responsible for the *Northern Pipeline Act,* and for the management and direction of the NPA and reporting to Parliament on its activities. The Deputy Minister Natural Resources Canada serves as the Commissioner and Deputy Head of the NPA. The NPA did not have any wholly owned subsidiaries at any time during the reporting period.

Mandate

The NPA mandate is twofold. First, it carries out Government of Canada responsibilities in relation to the pipeline and facilitates the efficient and expeditious planning and construction of the pipeline, taking into account local and regional interests, in particular

those of Indigenous Peoples. Secondly, it maximizes the social and economic benefits from the construction and operation of the pipeline while at the same time minimizing any adverse effect on the social and environmental conditions of the areas most directly affected by the pipeline.

The NPA acts as a single window between federal authorities and the project proponent, the Foothills Group of Companies, and between provincial and territorial governments, and the Government of the United States. In keeping with the *Northern Pipeline Act*, many regulatory powers of other Government of Canada departments and agencies related to the pipeline project are delegated to the NPA. This is not the case for those powers reserved exclusively to the Canada Energy Regulator or shared between the Canada Energy Regulator and the NPA.

2. Organizational Structure

Access to information-related activities for the NPA, such as the processing of requests under the ATIA, are handled by Natural Resources Canada's (NRCan) Access to Information and Privacy (ATIP) Secretariat, as per the NRCan-NPA Service Letter of Agreement. There were 0.012 full-time equivalents dedicated to support the NPA's access to information function during the reporting period.

Proactive Publication

Bill C-58, an act to amend the ATIA and the *Privacy Act* and to make consequential amendments to other acts, received royal assent and came into force on June 21, 2019. Bill C-58 modified the ATIA to include Part 2, adding a requirement for mandatory proactive publication of specific records produced by government institutions and Ministers' offices. The NRCan ATIP Secretariat plays a coordination and review function in relation to the proactive publication requirements. Collaboration between the NRCan ATIP Secretariat and the NPA ensures that the department's legislative proactive publication requirements are met. Section 9 of this report provides more detail on roles and responsibilities to ensure that proactive publication requirements are met.

3. Delegation Order

Section 95 of the ATIA provides that the head of a government institution may, by Delegation Order, designate one or more officers or employees of that institution to exercise or perform any of the powers, duties or functions of the head related to the administration of the ATIA.

See Annex A for information on the current delegation.

4. Performance 2025-2026

Multi-year trends 2023-2024 to 2025-2026

Number of requests received, responded to, and completed within legislated timelines: Between April 1, 2025 to March 31, 2026, the NPA received seven new access to information requests, representing a significant increase compared to the previous reporting periods, during which no requests were received in 2024-2025 and one request was received in 2023-2024 under the ATIA. This higher volume of ATIA requests was primarily attributed to a surge in requests for briefing notes following proactive disclosure.

The increase in requests in 2025-2026 also resulted in a corresponding higher volume of pages reviewed. A total of 504 pages were processed during 2025-2026, compared to no pages processed in 2024-2025 and 39 pages processed in 2023-2024.Despite the increase, all requests were completed within their legislative timeframes, resulting in a compliance rate of 100%. The NPA had no active requests at the end of the reporting period.

- **Completion Time:** Of the seven requests completed from April 1, 2025, to March 31, 2026:
    - three were completed within 1-30 days;
    - two were completed in 31-60 days; and
    - two were completed in 61-90 days.

Informal Requests: During the 2025-2026 fiscal year, the NPA did not receive any informal requests under the ATIA this is a slight decrease compared to the previous reporting period where the NPA received four informal requests.

Number of complaints received, responded to, and completed: From April 1, 2025, to March 31, 2026, the NPA did not receive any complaints. Similarly, no complaints were received in 2023-2024 or 2024-2025, and therefore no complaints were carried over from subsequent years.

Consultations received and/or completed from other institutions: The NPA did not receive or complete any consultation requests from another institution between April 1, 2025 and March 31, 2026. This trend is similar to the previous reporting periods; no consultation requests were received in 2023-2024 or 2024- 2025.

Application of extensions: During 2025-2026, extensions were applied to two (or 28.5%) of completed requests, compared to none in 2024-2025. Extensions were mainly required to conduct necessary consultations with other departments, and for the NRCan ATIP Secretariat to handle voluminous requests where meeting the original due date would interfere with its operations.

Requests for which records were “all disclosed” and “disclosed in part”: Between April 1, 2025, and March 31, 2026, the NPA completed seven access to

information requests. Of these:

- four requests (57%) had all records fully disclosed, and
- two requests (29%) were disclosed in part.
- The remaining request (14%) was fully excluded.

5. Training and Awareness

There were no access to information training or awareness activities provided to the NPA in fiscal year 2025-2026.

6. Policies, Guidelines, Procedures and Initiatives

Effective January 1, 2015, the NPA began to use the Open Government website to provide its monthly access to information summaries. The NPA relies on NRCan ATIP Secretariat to undertake this work and to lead any new policies, guidelines, procedures and initiatives.

The NPA did not implement or revise any policies, guidelines, or procedures during the reporting period.

Treasury Board Secretariat (TBS) removed the requirement to include the Statistical report in the annual report.

7. Initiatives and Projects to Improve Access to Information

As noted above, access to information-related activities for the NPA, such as initiatives and projects to improve access to information under the ATIA, are handled by NRCan ATIP Secretariat, as per the Service Letter of Agreement between the two entities. The following project, currently underway, aims to improve service to Canadians in the area of access to information, and to enhance transparency and accountability.

- **IT Modernization:** NRCan continues to advance its digital ATIP platform modernization through the implementation of a new cloud-hosted Request Processing Software Solution (RPSS). This initiative is replacing the NRCan's legacy system to improve efficiency, strengthen service delivery, and support a more secure, standardized ATIP program. NRCan selected the Amanda software as the next-generation, cloud-hosted Request Processing Software Solution. During the reporting period, the project achieved significant milestones, including completion of the discovery phase, finalization of business requirements and system design, establishment of the cloud hosting environment, and progress on security accreditation, training, and operational support planning. With these foundational activities substantially complete, the NRCan ATIP Secretariat remains on track for a production-ready deployment of the Amanda platform in late summer 2026.

8. Summary of Key Issues and Actions Taken on Complaints

There were no complaints or investigations initiated during this period or carried forward from the previous reporting period.

9. Proactive Publication under Part 2 of the ATIA

For the purposes of Part 2 of the ATIA, the NPA is a government entity, given that it is an institution that is listed in Schedule I.1 of the *Financial Administration Act*. To that end, the NPA is subject to sections 74 to 78, as well as sections 82 to 88 of the ATIA.

As noted above, the NPA has a Service Letter of Agreement with NRCan where internal services are provided by various departmental sectors. The NPA and each applicable NRCan sector lead receives or compiles with the required information subject to the proactive publication requirement. Prior to publishing, the information is reviewed through consultation with NPA and/or the NRCan ATIP Secretariat. Following review, the NPA or NRCan publishes the proactive publication requirement within the prescribed legislative timeline. The table below outlines key information related to the proactive publication process at the NPA:

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 by senior officer or employee	82	Within 30 days after the end of the month of reimbursement	No. No travel was undertaken.	Lead: NPA	Not applicable	Not applicable
Hospitality Expenses by senior officer or employee	83	Within 30 days after the end of the month of reimbursement	No. No hospitality was undertaken.	Lead: NPA	Not applicable	Not applicable
Reports tabled in Parliament	84	Within 30 days after tabling	Yes	Lead: NPA	100	https://northern-pipeline.canada.ca/reports-and-publications/northern-pipeline-agency-reports

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 Q4: Within 60 days after the quarter	No. No contracts were issued.	Lead: NPA	Not applicable	Not applicable
Grants & Contributions over $25,000	87	Within 30 days after the quarter	No. No G&Cs were issued.	Lead: NPA	Not applicable	Not applicable
Packages of briefing materials prepared for new or incoming deputy heads or equivalent	88(a)	Within 120 days after appointment	No. No packages were prepared for the new / incoming deputy head that arrived during the reporting period.	Lead: NPA	Not applicable	Not applicable
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	Yes.	Lead: NRCan	100	Briefing Note Titles and Numbers
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. No packages were prepared.	Lead: NPA	Not applicable	Not applicable
Applies to government institutions that are departments named in Schedule I to the *Financial Administration Act* or portions of the core public administration named in Schedule IV to that Act (i.e. government institutions for which Treasury Board is the employer)						
Reclassification of positions	85	Within 30 days after the quarter	No. No reclassification actions taken.	Lead: NPA	Not applicable	Not applicable

Apply to 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. No new or incoming minister during the reporting period.	Lead: NPA	Not applicable	Not applicable
Titles and reference numbers of memoranda prepared by a government institution for the minister, that is received by their office	74(b)	Within 30 days after the end of the month received	No. No items were sent to the Minister during the reporting period.	Lead: NPA	Not applicable	Not applicable
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 Common in June and December	No. No packages were prepared.	Lead: NPA	Not applicable	Not applicable
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. No packages were prepared.	Lead: NPA	Not applicable	Not applicable
Travel Expenses	75	Within 30 days after the end of the month of reimbursement	No. No travel was undertaken.	Lead: NPA	Not applicable	Not applicable

Hospitality Expenses	76	Within 30 days after the end of the month of reimbursement	No. No hospitality was undertaken.	Lead: NPA	Not applicable	Not applicable
Contracts over $10,000	77	Q1-3: Within 30 days after the quarter Q4: Within 60 days after the quarter	No. No contracts were issued.	Lead: NPA	Not applicable	Not applicable
Ministers' Offices Expenses	78	Within 120 days after the fiscal year	No. This consolidated report is currently published by TBS on behalf of all institutions.	Lead: TBS	Not applicable	Not applicable

The publications are available at the following web links:

- Open Government | Open Government, Government of Canada
- Natural Resources Canada
- Northern Pipeline Agency.

10. Monitoring Compliance

Monitoring ATIP compliance is a key component in enhancing performance and ensuring the right of access is upheld. The NRCan ATIP Secretariat employs the following tools and practices:

ATIP Weekly Planner: The NRCan ATIP Secretariat routinely monitors departmental ATIP performance using weekly tracking tools and dashboards. The ATIP Planner is shared with the Minister's Office, and highlights the overall year-to-date compliance rate for the NPA, the number of requests received, and the number of requests closed.

Inter-institutional Consultations: To support the TBS-issued guidance outlined in *Access to Information Implementation Notice 2022-01: Inter-institutional Consultations*, NRCan ATIP Secretariat limits inter-institutional consultations by consulting only when necessary and by sending courtesy consultations when appropriate. In doing so, NRCan ATIP Secretariat exercises discretion in applying certain exemptions warranted. In 2025-2026, NRCan ATIP Secretariat continued to ensure that decisions regarding inter-institutional consultations were well documented and clearly established.

Open Data: The NRCan ATIP Secretariat continues to assess the feasibility of making frequently requested information publicly available through informal

channels. Efforts included collaboration with a requester who developed a platform showcasing previously released requests, as well as engagement with program areas to determine whether other datasets can be proactively released.

Accuracy and Completeness: The NPA monitors the accuracy and completeness of proactive publication in accordance with established publication deadlines. This is achieved through a verification process of the published information and ongoing liaison on a semi-annual basis.

Annex A: Delegation Order

Positions	**Sections of the *Access to Information Act***
Deputy Minister	20(6)
Coordinator	7, 8(1), 9, 11(1) – (6), 12(2), 13 to 20(5), 21(1) to 24(1), 26, 27(1), 27(4), 28(2), 29(1), 33, 35(2)(b), 37(1)(b), 43(1), 44(2), 68, 69