

ALBERTA
INFORMATION AND PRIVACY COMMISSIONER

Report on an Investigation Regarding the Disclosure of Personal Information
By the
Alberta Energy and Utilities Board
(Investigation #F3882)

March 7, 2007

Investigation Report F2007-IR-002

I. INTRODUCTION

[1] On November 9th, 2006 an article in the Edmonton Journal reported that personal information about residents near the community of Rocky Rapids was posted on the website of the Alberta Energy and Utilities Board (the "EUB" or the "Board"). The information had been collected from people who would be in the emergency planning zone of two sour-gas wells proposed by a company called West Energy Ltd. The information that was posted on the site included the names and addresses of residents, as well as "sensitive" comments received from them.

[2] The Commissioner felt the issue was significant enough that on November 20th, he decided to initiate an investigation on his own motion under the *Freedom of Information and Protection of Privacy Act* (the "FOIP Act" or the "Act"). The significance was determined by the perceived sensitivity of some of the data; the potential breadth of the disclosure because the information was alleged to have been placed on the Internet (contrary to the Act); and, the likelihood that investigating the issue could provide some helpful information for all public bodies who utilize the Internet to share information with the public. Section 53(1)(a) of the Act authorizes the Commissioner to conduct investigations to ensure compliance with any provision of the Act.

[3] The Commissioner authorized me to investigate this matter. This report contains my analysis of the issues and the findings of my investigation.

II. INVESTIGATION ISSUES

[4] The issues are:

1. Did the Alberta Energy and Utilities Board disclose personal information in compliance with section 40 of the FOIP Act?
2. Did the Alberta Energy and Utilities Board protect the personal information by making reasonable security arrangements against the risks of unauthorized access, collection, use, disclosure or destruction as required by section 38 of the FOIP Act?

III. APPLICATION OF THE *Freedom of Information and Protection of Privacy Act*

[5] Personal information is defined in section 1(n) of the Act as “*recorded information about an identifiable individual, including...the individual’s name, home or business address or home or business telephone number,... the individual’s ...marital or family status,...information about the individual’s health and health care history, including information about a physical or mental disability,...anyone else’s opinion about the individual, and the individual’s personal views or opinions, except if they are about someone else*”.

[6] The list in section 1(n) is not exhaustive and can also include, if found to be recorded information about an identifiable individual, facts and events discussed, observations made, the circumstances in which information is given, and the nature and content of the information.

[7] The Act allows for the disclosure of personal information by public bodies under limited circumstances and requires that the personal information be disclosed only to the extent necessary to fulfill the purpose for the disclosure [section 40(1) and (4)].

[8] Additionally, the Act places a duty on public bodies to protect personal information against certain risks such as unauthorized access, use and disclosure (section 38).

[9] The Alberta Energy and Utilities Board is a public body subject to the Act.

[10] The investigation conducted by the Commissioner’s Office included discussions with representatives from the EUB.

IV. CHRONOLOGY OF EVENTS

[11] West Energy Ltd., an energy exploration company (the "Organization"), applied for two well licences from the EUB. As part of that application process, on May 8th, 2006 the Organization provided a document, referred to as a Line List, to the EUB. The Line List contained the information at issue (noted below under heading V.). The document was, as is standard practice, submitted electronically. This form of submission automatically places the input onto the EUB's Integrated Application Registry (IAR). IAR is accessible via the EUB's website on the Internet.

[12] The application ~ a set of many documents ~ was originally filed by the Organization on March 31st, 2006. Because the application had deficiencies it was rejected by the application audit staff and a replacement requested. The original was superseded by the replacement application file on May 8th.

[13] On October 24th, 2006, the EUB was notified by a lawyer for one of the area residents that the Line List was available on IAR from the EUB's website. The EUB removed the Line List from public accessibility on IAR that same day.

[14] The Line List is to remain confidential until, at least, the outcome of this investigation. The EUB has also implemented a policy that all Line Lists associated with energy applications be assigned confidential status until the outcome of this investigation.

[15] The Organization is subject to the *Personal Information Protection Act* (referred to as "PIPA"). A second investigation under that statute was also opened by this Office. The disclosure provisions of PIPA were examined and an investigation report on the activities of the Organization was prepared. Though separate and distinct, this report and the PIPA report, P2007-IR-003, are intended to complement each other.

V. INFORMATION AT ISSUE

[16] The EUB disclosed the following personal information: the first and last name of the resident; the street or mailing address, city, postal code and phone number of where a resident may be contacted; a date indicating when the resident was contacted and whether the resident objects to the proposed applications; comments from or about the resident; the land description (referred to as the land location on the document that was disclosed and which may not coincide with the mailing address if, for instance, the owner does not permanently reside on the land); a category known as land interest (resident, business, public facility, etc.); and, a number corresponding to the Emergency Response Plan (ERP) map (which identifies where the resident is located on a map).

[17] There are 15 categories of information contained in columns on the Line List. Twelve of the categories/columns correspond to the type of information listed in the preceding paragraph. The remaining three ~ “Date of Contact”, “Type of Contact” and “Info Package” ~ are not personal information. There were 303 separate lines of entry; 248 lines contained personal information. The remaining 55 dealt with public facilities, businesses, schools, airports, etc.

[18] The column entitled “Comments” contained one of three types of information. One type was that the resident had no comments so the word “none” appears in the column. The second type was the concerns any particular resident had with an application; for example, safety issues, compensation concerns, land price concerns, air quality, noise levels, the impact on ranching and animals, evacuation concerns for residents and livestock, etc. These are the personal views or opinions of the residents so are considered personal information under section 1(n)(ix) of the Act.

[19] The third type was information that would be needed to execute an evacuation in the event of an emergency at one of the proposed wells; for example: cell phone numbers, statements that a house is not occupied, health issues (for instance, one resident needs electricity to run a health-related machine), vacation plans (identifies that a residence is vacant during certain months), and, in one case, the password used by a family for child safety purposes.

[20] With the exception of the three categories noted in paragraph 17 the information disclosed is personal information because it is information that is about identifiable individuals.

VI. BACKGROUND

[21] A brief summary of the mandate and operations of the EUB is helpful in understanding how the disclosure occurred.

[22] The EUB is a quasi-judicial tribunal authorized to issue licences, permits and other approvals relating to projects in the oil and gas industry. The licence application process is one of the EUB’s core business activities. In the course of processing applications for licences or other approvals the EUB is required by statute to determine whether any person may be directly and adversely affected by the Board’s decision on the application.

[23] Applicants ~ of which the Organization is one ~ are required to provide notice of the application to residents, occupants and owners of land within the notification areas prescribed by the Board for the particular type of application.

The applicant is also required to undertake direct consultation within a prescribed consultation area. The consultation instructions are contained in what is referred to as Directive 56 (which will be more fully explained later in this report).

[24] In association with certain types of applications, applicants are also required to prepare an Emergency Response Plan. Emergency Response Plans are, as its name suggests, the plan an applicant would follow to ensure, among other things, the safety of the persons who reside within the prescribed area were a safety emergency to occur. It includes details about how residents in an area would be evacuated. The Emergency Response Plan instructions are contained in what is referred to as Directive 71 (which will be more fully explained later in this report).

VII. ANALYSIS and FINDINGS

Collection of Personal Information

[25] While this investigation focuses on the disclosure and protection of personal information by the EUB, a complete examination also includes determining whether the collection of the personal information (that was subsequently disclosed) was authorized in the first place.

[26] The collection of personal information is dealt with in section 33 of the FOIP Act. The EUB identified section 33(a) as its authority to collect the information in question. Section 33(a) allows personal information to be collected by a public body when "...the collection of that information is expressly authorized by an enactment of Alberta or Canada...". An enactment is defined in the Interpretation Act to mean "an Act or a regulation or any portion of an Act or regulation". The investigation then turned to the acts and regulations that govern the public body.

[27] The *Alberta Energy and Utilities Board Act* (the "AEUB Act") states that:

- The "Board" means the Alberta Energy and Utilities Board (section 1);
- The Alberta Energy and Utilities Board is established as a corporation consisting of its members (section 2);
- The EUB includes members from the Energy Resources Conservation Board (the "ERCB") and the Public Utilities Board (the "PUB") (section 3);
- All matters that may be dealt with by the ERCB or the PUB under any enactment shall be dealt with by the EUB and are within the exclusive jurisdiction of the EUB (section 13).

[28] The *Oil and Gas Conservation Act* (the "OGC Act") and the *Oil and Gas Conservation Regulations* (AR 151/71) deal with identifying the type of information that can be collected by the Board. (Technically, the reference to "the Board" in

both the *OGC Act* and its *Regulation* means the Energy Resources Conservation Board. However, as noted in the preceding paragraph, matters dealt with by the ERCB are within the exclusive jurisdiction of the EUB.)

[29] Section 10 in the *Oil and Gas Conservation Act* states that:

10(1) *The Board may make regulations*

(a) prescribing the information that is to be included in or is to accompany any application under this Act or the regulations;...

[30] The regulation that prescribes the information to be included with an application is the *Oil and Gas Conservation Regulations (AR 151/71)*; it states that:

2.010(1) *An application for a licence shall*

(a) be made on the form prescribed for that purpose by, and obtainable from, the Board, and

*(b) include the documentation required by **Directive 56**, "Energy Development Application Guide and Schedules", published by the Board. (emphasis added.)*

[31] Therefore, it is Directive 56 that provides the detail of what can be collected. (A list of the information collected is provided in the table in Appendix 1 of this report.) Sections 7.10.2.1 and 7.10.2.2 of the Directive allow for the collection of the first and last names of the individuals; their telephone number, mailing address, and legal land description; a map locating where a party resides; a description of each party's interest in the land; and, the date when (if) non-objection was obtained from the party. These are the elements that were in columns 1 through 9, and 12 on the Line List and are also identified in the table in the Appendix.

[32] The information in columns 10, 13 and 14 are not considered personal information and are not dealt with in this report.

[33] Column 11 contained a EUB-generated number indicating that a formal objection had been received ~ which reveals an opinion about the application ~ though it indicated nothing further about the objection. Affected parties have a right to object to the application/licence or issuing of the licence by submitting an objection notice to the EUB. Section 26(2) of the *Energy Resources Conservation Act* (the "ERCA") allows for the collection of those objections.

26(1) *Unless it is otherwise expressly provided by this Act to the contrary, any order or direction that the Board is authorized to make may be made on its own*

motion or initiative, and without the giving of notice, and without holding a hearing.

(2) Notwithstanding subsection (1), if it appears to the Board that its decision on an application may directly and adversely affect the rights of a person, the Board shall give the person

(a) notice of the application,

(b) a reasonable opportunity of learning the facts bearing on the application and presented to the Board by the applicant and other parties to the application,

(c) a reasonable opportunity to furnish evidence relevant to the application or in contradiction or explanation of the facts or allegations in the application,

(d) if the person will not have a fair opportunity to contradict or explain the facts or allegations in the application without cross-examination of the person presenting the application, an opportunity of cross-examination in the presence of the Board or its examiners, and

(e) an adequate opportunity of making representations by way of argument to the Board or its examiners.

[34] The remaining information, the “Comments” column (#15) contained information that could be categorized three ways:

1. A statement that there was no comment (when the word “none” appears);
2. Comments about concerns a party had with the application/licence; and,
3. Comments that deal with emergency planning activities.

[35] Collecting the comments about the concerns of parties ~ or that there are none ~ is also a requirement under Directive 56, in section 7.10.2.6.

[36] The comments that deal with emergency planning activities are a requirement under another directive of the EUB’s, also referred to in the OCG Regulations in section 8.002(1).

*8.002(1) A licensee of a well or facility shall prepare a corporate ERP in accordance with **Directive 71**, Emergency Preparedness and Response Requirements for the Upstream Petroleum Industry, and any amendments to **Directive 71**, as published by the Board. (emphasis added.)*

(2) A licensee referred to in subsection (1) shall on request file its corporate ERP with the Board for review by the Board.

[37] Therefore, it is Directive 71 that provides the detail of what can be collected. Section 2.2 requires applicants to obtain from residents information needed for emergency planning purposes, and, for certain licence types, to submit it to the EUB. The Directive requires that applicants supply confirmation of contact with the residents, facilities, etc. in the emergency planning zone and includes the need for any comments from residents that would be necessary to effect a proper evacuation including medical concerns, information about children or animals, information about anyone needing specialized or immediate attention during an emergency, etc.

Indirect Collection

[38] The personal information was collected by the Organization and provided to the EUB. The FOIP Act requires that personal information be collected directly from the individual the information is about unless one of the conditions in section 34 applies. One of those conditions allows for “another method of collection [when it] is authorized by ...another Act or regulation under another Act...” [section 34(1)(a)(ii)]. In this case the *OGC Regulation (AR 151/71)* stipulates that an applicant must supply certain information further to Directives 56 and 71. Therefore the initial collection must be completed by an applicant (in this case, the Organization) and section 34(1)(a)(ii) allows for the indirect collection by the EUB.

Conclusion on Collection

[39] My conclusion is that the EUB had the authority to collect the information ~ that was eventually disclosed on its website ~ under Directives #56 and #71, and under section 26(2) of the ERCA.

Disclosure of Personal Information

[40] The investigation dealt with whether the EUB had the authority to disclose the personal information contained on the Line List. In this case, the Line List contained information collected under three separate authorities; Directive 56, Directive 71 and section 26(2) of the ERCA. The disclosure of the three information types must also be dealt with separately.

Disclosure of Application (Directive 56) Information ~ Discussion

[41] Personal information may be disclosed only under the circumstances identified in section 40 of the FOIP Act. One of those circumstances applies here.

40(1) *A public body may disclose personal information only*

...

(f) for any purpose in accordance with an enactment of Alberta or Canada that authorizes or requires the disclosure...".

[42] A release of the personal information is restricted further by section 40(4).

40(4) A public body may disclose personal information only to the extent necessary to enable the public body to carry out the purposes described in subsection (1), (2) and (3) in a reasonable manner.

[43] Again, the investigation turned to the enactments that govern the EUB.

[44] Section 29(3) of the *AEUB Act* states that “[t]he Board may make regulations prescribing rules of practice governing the Board’s procedure and hearings”. One of the regulations, referred to as the *AEUB Rules of Practice*, has the following provisions relative to this investigation.

2 *In these Rules,*

...

(p) *“proceeding” means a matter brought before the Board*

(i) by application,

(ii) by the Board on its own initiative, or

(iii) at the request of the Lieutenant Governor in Council;

...

12(1) Subject to this section, all documents filed in respect of a proceeding, including any submissions or other documents filed prior to the commencement of the proceeding, must be placed on the public record. (emphasis added.)

[45] It is clear that information must be collected by the EUB relative to an application. Information collected under Directive 56 is application information. An application is considered to be a proceeding further to section 2(p)(i) of the *AEUB Act*, above. Section 12(1) of the *AEUB Rules of Practice* states that information relative to a proceeding must be placed on the public record. While “public record” is not defined, its ordinary or conventional definition would allow for a disclosure unless section 40(4) limited it in some way.

Disclosure of Application (Directive 56) Information ~ Conclusion

[46] Section 40(4) of the FOIP Act limits the disclosure “to the extent necessary” to carry out the purpose. The “extent necessary” in this case is “all documents filed in respect of a proceeding”. Therefore I conclude that the EUB had the authority to disclose the Directive 56 information under section 40(1)(f) of the FOIP Act because another enactment, section 12(1) of the *AEUB Rules of Practice*, requires that full disclosure.

Disclosure of Objection (ERCA) Information ~ Discussion and Conclusion

[47] Objection information is part of the application process; as a result it is part of a proceeding. (In this circumstance the information is the acknowledgement that an objection was received; it is not the content of the objection.) Like the information collected under Directive 56, objection documents must be placed on the public record. Therefore I conclude that the disclosure was allowed under section 40(1)(f) of the FOIP Act because another enactment, section 12(1) of the *AEUB Rules of Practice*, requires that disclosure.

Disclosure of Emergency Planning (Directive 71) Information ~ Discussion

[48] The EUB confirmed that emergency response planning and plans are not part of the application process. This is supported by section 2.010(1) of the *OGC Regulation* which refers to “an application” and “documentation required by Directive 56” (see paragraph 29). Directive 71 (emergency planning information) refers to a separate process and the documentation collected under that authority is not referred to in the “public record” provision.

[49] Besides being a collection authority for emergency planning information, Directive 71 also provides for restrictions on disclosure. In the portion dealing with Conducting Public Involvement Programs, section 2.2.4, the following instruction is provided for applicants.

A licensee is required to obtain ...a 24-hour contact telephone number...number of occupants, specifying adults and preschool and school-age children; names of those with special needs, such as those who require evacuation assistance, requires early notification/communication, have no telephones, require transportation assistance, or for who there may be a language barrier; any additional concerns or comments; and any other information deemed necessary to ensure that effective emergency response procedures are developed.

*...Personal information is protected by the privacy provisions of the Freedom of Information and Protection of Privacy Act (FOIP) and **must be kept confidential at all times.***

In keeping with the spirit of FOIP, a licensee must only acquire information necessary to the ERP, and this information should only be provided to key emergency responders who require it for immediate response purposes in the event of an emergency and to the EUB. (emphasis added.)

[50] It is at this point where the actions of the Organization and the stated practices of the EUB converged resulting in the inadvertent disclosure. The EUB did not intend to have the emergency planning information put on its website and the same can likely be said of the Organization. The EUB did not in this case, nor does it in general practice, request that Directive 71 information be submitted via the IAR. The confusion results because it is unclear whether the Organization was aware or should have known that all information submitted via the IAR makes its way to a public website or whether the EUB's instructions are clear enough to enable an applicant to make that determination.

[51] The EUB ~ immediately upon being notified that the Line List was on the EUB website and that it contained sensitive information dealing with emergency planning ~ made the information confidential and removed it from its public website. This was done without prompting from this Office and suggests the seriousness with which the EUB is dealing with this issue.

Disclosure of Emergency Planning (Directive 71) Information ~ Conclusion

[52] I conclude that the EUB did not have the authority under section 40(1)(f) of the Act, or under any other provision of section 40, to disclose the emergency planning information contained in the Comments column (despite the absence of the intention on the part of the EUB to do so). Additionally, provisions in the Directive itself restrict disclosure. As there was no authority to disclose, it is not necessary to consider whether the release of that information exceeds the "extent necessary" criterion of section 40(4).

Protection of Personal Information

[53] The protection of personal information is dealt with in section 38 of the FOIP Act:

38 The head of a public body must protect personal information by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or destruction.

[54] The information collected by the EUB (relative to this investigation) is done through a variety of ways:

1. Directive 56 information is submitted electronically through the Digital Data Submission (DDS) to the Applications Branch and appears on the Integrated Application Registry (IAR);
2. Directive 71 information is hand-delivered or mailed to the Public Safety Group within the Public Safety/Field Surveillance Branch.
3. Objections are also handled by the Applications Branch and are primarily received via Canada Post. Some objections are received by e-mail and some are provided by the applicant within their application under Directive 56.

[55] These methods of receiving information, while necessary, can cause confusion. The disclosure covered in this report happened because the Organization blended some of the requirements of two Directives into one document and submitted it to the Applications Branch through the IAR. I note again that the IAR is accessible through the Internet.

[56] The EUB handles 60,000 applications a year (though most applications do not have an emergency planning component). Recognizing that the submission requirements that contain personal information form the minority of all documents submitted, it is not difficult to imagine that disclosure errors can occur particularly given the complexity of the application and emergency planning processes, and the considerable amount of information applicants must submit to the EUB.

[57] Section 38 of the FOIP Act requires the EUB to make reasonable security arrangements to guard against the risk of unauthorized disclosure. Proper instructions would form part of the security arrangements as would systems requirements and staff training. I note that the EUB does provide instructions to applicants; they are complicated and lengthy though necessarily so.

[58] Application information is electronically submitted to the Applications Branch. Emergency planning information is, usually, hand delivered or mailed to the Public Safety Group within the Public Safety /Field Surveillance Branch. From the perspective of an applicant, the distinction between the two branches may not be clear particularly since the instructions refer simply to the EUB.

[59] The information had originally been received by the EUB on March 31st, 2006 and found to be deficient. While it is not clear what the nature of the deficiencies were, it does show that the EUB has the opportunity (and may have *had* the opportunity, in this case) to inform applicants that personal information not intended for public release is contained on submissions to the IAR and to allow applicants the chance to resubmit the documentation to the IAR without the personal information gathered under Directive 71 (emergency planning information).

[60] Based on the above I conclude that the EUB did not make reasonable security arrangements to prevent the unauthorized disclosure of the personal information provided under Directive 71.

VIII. CONCLUSIONS

[61] I have concluded that the requirement under section 38 of the Act for reasonable security arrangements was not met, particularly arrangements to guard against unauthorized disclosure.

[62] I have concluded that the disclosure of most of the information in the Line List was authorized under section 40(1)(f) of the Act. That includes the information contained in columns 1 through 9, 11, 12 and the concerns-of-residents part of column 15. Information in columns 10, 13 and 14 are not personal information and I offer no opinion.

[63] I have concluded that the disclosure of the personal information in column 15 of the Line List dealing with emergency planning information was not allowed for under section 40(1)(f) and was not allowed for under any other provision in section 40(1) of the Act. The disclosure was therefore not authorized.

IX. RECOMMENDATIONS

[64] Clearly the EUB wants to adhere to the provisions of the FOIP Act. That the Board, before this Office was involved, removed the information at issue from public distribution (along with other information it merely thought might be at risk) indicates that. Additionally, I found that many of the actions of the EUB conform to the Act's provisions and that the disclosure would not have occurred had the Organization not included the requirements of the two Directives into a single submission contrary to the submission practices of the EUB. My recommendations, then, are intended to be tempered with that notion since they are, in the main, broad and general. However, the emergency planning information that was on the website for almost six months should not have been viewable by the public and the EUB should take steps to avoid the risk of a reoccurrence.

[65] In my opinion, the requirements in Directive 56 coupled with the "public record" stipulation in section 12(1) of the *AEUB Rules of Practice* do not reflect fair information practices. They were likely developed when the idea of data privacy was only beginning and when access to information was primarily limited to paper and did not have the enormous ease of use or availability of the Internet. In the past some measure of privacy was simply the result, it was not necessarily the objective; the use of the Internet has eroded even that degree of protection.

Additionally, the instructions provided for in Directive 71 ~ where the collection of very sensitive information can occur ~ are unclear and can appear to be inconsistent with the requirements of Directive 56 and with section 12(1) of the *AEUB Rules of Practice*.

[66] I recommend that the Board take this opportunity to review all its personal information collection and disclosure practices and determine what **needs** to be disclosed and what should be either withheld or have a limited disclosure. The review should cover the application, the application review, the emergency planning and the hearing processes to ensure they reflect both the privacy (and access) concerns of the public and the business and fairness requirements for the Board to carry out its mandate.

[67] I will mention one example to illustrate my recommendation for reviewing the disclosure practices of the Board. Directive 56 requires the collection of the names and concerns of residents in a designated area. While this information should be shared between the Board and the Organization/ Applicant, I remain unconvinced that that same information needs to be available to anyone who has access to the Internet.

[68] The EUB suggested that the disclosure of some of the information collected under Directive 56 has a public interest component for the residents in the designated area because it shows that an applicant is conforming to the Directive and it identifies the area so all residents are informed about the scope of the application (among other things). I am not suggesting that is to be fettered; in fact, disclosure to inform the public is also a fair information practice. However, I am suggesting that a review may help distinguish between the need to collect or disclose information and the convenience to collect or disclose.

[69] Section 12(2), (3) and (4) of the Rules deal with the request for confidentiality by a party to the proceeding. The inclusion of this provision suggests that the Legislature was at least open to the idea that confidentiality may be a concern for those involved. Since the personal information requirements of Directive 56 are determined by the Board, the need-to-know can also be examined by the Board.

[70] I recommend that the Board provide clear direction to applicants ~ and to the Organization in particular ~ that the Directive 56 information submitted via the Integrated Applications Registry is separate from the submission of information needed under Directive 71. Instructions should be clear whether the information is to be submitted electronically or by paper. Additionally, the IAR could be updated with systems prompts so applicants do not submit unnecessary personal information.

[71] Fair information practices propose that collection and disclosure practices have an education or at least a notification component for the public. Even though the personal information is collected by an applicant I recommend that the notification provided to the public on the EUB website and other information documents (e.g. pamphlets) be clear as to what personal information needs to be collected, how the personal information will be used and what personal information will be disclosed. The reason for this is that individuals who provide information to applicants do so under EUB requirements and thus are likely to refer to the EUB as one of the sources to inform them.

[72] I recommend that basic FOIP privacy training be provided for the Applications Branch staff and Public Safety Group within the Public Safety Field Surveillance Branch. This level of training could be accomplished in half day sessions.

[73] I want to thank the EUB staff who provided me with their time, expertise and assistance in investigating this issue.

[74] This case is now closed.

Submitted by,

Catherine Taylor
Portfolio Officer