



REVIEW REPORT 302-2016

Ministry of the Economy

March 28, 2017

Summary:

The Ministry of the Economy severed certain information from a 1001 page record pursuant to subsections 17(1)(a), 19(1)(b), 19(1)(c)(i), (ii), (iii) and 29(1) of *The Freedom of Information and Protection of Privacy Act* (FOIP). The Commissioner found that subsections 17(1)(a) and 29(1) of FOIP applied to only portions of the record and recommended release of the rest of the record. He also found that the Ministry did not respond within legislative timelines and recommended that the Ministry closely monitor its response times to ensure the measures it has taken for improvement are effective.

I BACKGROUND

[1] On August 29, 2016, the Ministry of the Economy (the Ministry) received an access to information request for the following information:

Copies of all letters and emails received by the Ministry related to the acquisition of Partial Grid Cells, in particular but not limited to those received from North Arrow Minerals Inc.

[2] The Applicant requested e-mails for the years 2012 to 2016. The Ministry responded to the Applicant on December 19, 2016. It released some records in full. It also released other records while severing information pursuant to subsections 17(1)(a), 19(1)(b), 19(1)(c)(i), (ii), (iii) and 29(1) of *The Freedom of Information and Protection of Privacy Act* (FOIP). Finally, the Ministry indicated that it withheld some records in full pursuant to subsection 19(1)(b) of FOIP.

[3] The Applicant was dissatisfied with the Ministry's response. On December 21, 2016, he requested a review by my office. My office notified both the Applicant and the Ministry of our intention to undertake the review on December 28, 2016. My office also notified 12 third parties of the review. Later, the Ministry indicated there were only nine relevant third parties.

II RECORDS AT ISSUE

[4] The responsive record consists of 1001 pages. A majority of the record has been released to the Applicant. The Ministry has severed only passages from many pages of the record pursuant to section 8 of FOIP.

[5] The Ministry applied subsection 17(1)(b) of FOIP to 34 pages in full and 39 other passages.

[6] The Ministry has applied subsection 19(1)(b) of FOIP to 41 pages in full. It also applied this exemption to 263 passages throughout the other 960 pages. The Ministry also applied subsections 19(1)(c)(i), (ii) and (iii) of FOIP to one of these passages.

[7] For details about the severing of the record pursuant to subsections 17(1)(b), 19(1)(b) and (c), please see Appendix A of this report.

[8] Finally, on the majority of pages, the Ministry has severed information pursuant to section 29(1) of FOIP.

III DISCUSSION OF THE ISSUES

[9] The Ministry qualifies as a government institution pursuant to subsection 2(1)(d)(i) of FOIP.

1. Did the Ministry respond to the Applicant within the legislative timelines?

[10] Subsection 7(2) of FOIP requires government institutions to respond to access to information requests within 30 days after the request is made. Subsection 7(2) provides:

7(2) The head shall give written notice to the applicant within 30 days after the application is made:...

[11] Based on the information, it took the Ministry 113 days in total to respond to the Applicant's access request.

[12] Section 12 of FOIP enables government institutions to extend the 30 days prescribed in subsection 7(2) for a reasonable period not exceeding 30 days.

[13] Twenty-four days after receiving the access request, the Ministry provided the Applicant with a fee estimate and extended the deadline for 30 days. The Ministry had six days remaining of the 30 day timeline in which to respond to the Applicant's request. The timeline would have been put on hold until the Applicant paid 50% of the estimated fee as a deposit. In this case, it only took the Applicant four days to pay the fee. The Ministry reported that it was fairly certain that he would pay the deposit. However, it may have taken the Applicant longer than four days. In that time, the Ministry's circumstances may have changed so that a time extension was not needed. I urge the Ministry only to use time extensions when it is necessary to do so.

[14] After the Applicant paid the deposit, it took 85 days until the Ministry provided the final response.

[15] The Ministry recognized that it did not meet legislated timelines. It reported that, by August of 2016, it had a 65% increase in the number of access to information requests, year over year, with the same number of employees processing them. It also reported that it saw an increase in the number of Requests for Review from approximately 2 per year to about 15 per year.

[16] In response, the Ministry reported that it had taken a number of measures to address this situation including finding opportunities to clarify requests with Applicants and supporting search efforts made in divisions of the Ministry.

[17] The Ministry also is considering some additional steps to address this issue such as decreasing the number of approvers required in the access to information process, developing training material for those who search for records and a greater focus on records management.

[18] I encourage the Ministry to monitor its response times closely to ensure that the measures it is taking to improve are effective.

2. Does subsection 17(1)(a) of FOIP apply to the record?

[19] Subsection 17(1)(a) of FOIP provides:

17(1) Subject to subsection (2), a head may refuse to give access to a record that could reasonably be expected to disclose:

(a) advice, proposals, recommendations, analyses or policy options developed by or for a government institution or a member of the Executive Council;

[20] My office has considered this exemption many times in the past. The exemption is meant to allow for candor during the policy-making process, rather than providing for the non-disclosure of all forms of advice. The established test that my office uses to determine the applicability of this exemption is as follows:

1. Does the information qualify as advice, proposals, recommendations, analyses or policy options?

2. The advice, recommendations, proposals, analyses and/or policy options must:

i) be either sought, expected, or be part of the responsibility of the person who prepared the record; and

ii) be prepared for the purpose of doing something, for example, taking an action or making a decision; and

iii) involve or be intended for someone who can take or implement the action.

3. Was the advice, recommendations, analyses and/or policy options developed by or for the public body?

Pages 83, 101 and 392

[21] The Ministry has severed the same passage from pages 83 and 101 and a different passage from page 392 pursuant to subsection 17(1)(a) of FOIP. The Ministry indicated that these passages qualify as advice. My office has defined advice as the analysis of a situation or issue that may require action and the presentation of options for future action, but not the presentation of facts.

[22] Upon review of the record, the passage on pages 83 and 101 gives a clear direction. It does not qualify as advice. Further, all of the passages also provide an opinion with respect to the Applicant. This would qualify as the personal information of the Applicant pursuant to subsection 24(1)(h) of FOIP and should be provided to the Applicant.

[23] The first part of the test is not met and subsection 17(1)(a) of FOIP does not apply to the passages on pages 83 and 101 and 392 of the record.

Pages 406 to 413

[24] These pages are versions of an e-mail chain. The Ministry has indicated that the passages on these pages to which it has applied subsection 17(1)(a) qualify as advice.

[25] The same passage appears on pages 406, 408 and 411. This passage discusses a fault in the MARS system. It gives a view on the system. Upon review, there is no proposed action to be taken or decision to be made. As such, it does not qualify as advice.

[26] In response to the passage above, the passage on page 408 communicates the author's decision to communicate this view to someone. This decision appears to be independent of what was communicated in the previous passage. It does not qualify as advice.

[27] Finally, one passage is severed on page 411 which expresses a view. It does not qualify as advice. Subsection 17(1)(a) of FOIP does not apply to the passages severed on pages 406 to 413.

Pages 483 to 515

[28] In its submission, the Ministry described this group of records as email strings originating from a contractor hired by the Ministry to conduct research on the Ministry's behalf. It indicated that the e-mail contains recommendations and policy options as well as advice. These records relate to the evaluation of a certain computer system.

[29] My office has said that recommendations relate to a suggested course of action as well as the rationale for a suggested course of action. Recommendations are generally more explicit and pointed than advice. Policy options are closely related to advice and recommendations and refer to the concise setting out of the advantages and disadvantages of particular courses of action.

[30] The subject line of the e-mails and name of attachments that appear on pages 483, 496, 510, 512, 513, 514 and 515 do not qualify as or reveal advice, recommendations or policy options. As such, subsection 17(1)(a) of FOIP does not apply to these passages.

[31] The first paragraph severed pursuant to subsection 17(1)(a) of FOIP on page 483 is facts and views given by the author. No course of action is suggested. The exemption does not apply. This paragraph is repeated on pages 496, 510, 513 and 515.

[32] The second paragraph severed pursuant to subsection 17(1)(a) of FOIP on page 483 gives a recommendation regarding a particular issue. As it is given by a contractor who was hired to do work on the Ministry's behalf, I am also satisfied that the other parts of the test are met. Subsection 17(1)(a) of FOIP applies to this paragraph. It is repeated on pages 496, 510, 513 and 515.

[33] With respect to the first paragraph found on page 496, it is mostly made up of questions posed by Ministry staff. This does not qualify as advice, recommendations or policy options. The only exception is the sentence regarding monthly meetings. This may

qualify as advice; however the Ministry has not addressed the other portions of the test. As such, subsection 17(1)(a) of FOIP does not apply.

[34] The paragraph severed pursuant to subsection 17(1)(a) of FOIP simply thanks the contractor for her work and communicates the Ministry's plans going forward. This does not qualify as advice, recommendations or policy options. This paragraph is repeated on pages 512 and 515. Subsection 17(1)(a) of FOIP does not apply to these passages.

[35] The remaining paragraphs severed pursuant to subsection 17(1)(a) of FOIP simply pass information and suggest a meeting to discuss the information. This would not qualify as advice, recommendations or policy options. Subsection 17(1)(a) of FOIP does not apply.

[36] Finally, the Ministry has applied subsection 17(1)(a) of FOIP to 12 pages of attachments prepared by the contractor. These appear twice in the record. The first page is a list of flaws that have been discovered in MARS. This would not qualify as advice, recommendations or policy options. No course of action is suggested in this document. The other 11 pages is a print out from MARS. It contains raw data that does not contain advice, recommendations or policy options. Subsection 17(1)(a) of FOIP does not apply to these attachments.

[37] For details on where I have found that subsection 17(1)(a) of FOIP applies, please see Appendix A.

3. Does subsection 19(1)(b) of FOIP apply to the record?

[38] Subsection 19(1)(b) of FOIP provides:

19(1) Subject to Part V and this section, a head shall refuse to give access to a record that contains:

...

(b) financial, commercial, scientific, technical or labour relations information that is supplied in confidence, implicitly or explicitly, to a government institution by a third party;

[39] My office has established the following test for subsection 19(1)(b) of FOIP:

1. Is the information financial, commercial, scientific, technical or labour relations information?
2. Was the information supplied by the third party to a public body?
3. Was the information supplied in confidence implicitly or explicitly?
4. Does the third party consent to release of the information?

[40] The record is composed mostly of e-mail strings and attachments. While the Ministry has withheld some pages in full pursuant to subsection 19(1)(b) of FOIP, it has generally withheld certain passages from the remaining pages.

[41] The record contains information involving nine third parties. The Ministry has grouped the records by third party. All of the third parties were invited to make submissions for the purpose of this review; only one has provided a submission.

[42] I will begin my analysis of the Ministry's application of subsection 19(1)(b) of FOIP by considering whether the information was supplied implicitly or explicitly in confidence.

[43] When addressing this part of the test, for all information involving nine different third parties, the Ministry's submission stated: "The very nature of the emails themselves is confidential; these are for-profit industry companies asking questions of a government official in order to conduct their business." The submission also explained that the nine third party businesses have a long established relationship with the Ministry. Over time, a level of trust has developed with the Ministry which encourages a frank exchange of information between the parties. Without this trust, the Ministry stated that the third party would simply not contact the Ministry. It also stated that the Ministry treats all communications with third parties in a consistent manner.

[44] The Ministry asserts that all of the information was provided implicitly in confidence. Implicitly means that the confidentiality is understood even though there is no actual statement of confidentiality, agreement, or other physical evidence of the understanding that the information will be kept confidential.

[45] The Ministry submitted that it treats all communications with third parties consistently, but it did not provide a policy or other material describing what that means and how it ensures that it is understood by all Ministry staff members. I note that the Ministry has severed only some information from the record pursuant to subsection 19(1)(b) of FOIP, while other information has been released to the Applicant. It has not demonstrated that it has treated the information consistently. More significantly, it has not explained how its practice of treating the material consistently was understood by all nine third parties before the information was supplied to the Ministry. The Ministry's submission has not persuaded me that the information severed from the record pursuant to subsection 19(1)(b) of FOIP was supplied implicitly in confidence.

[46] As noted, one third party, made a submission for the purpose of our review of subsection 19(1)(b) of FOIP. The Ministry has severed nine passages from three pages of e-mails in the record and a one page attachment in full with respect to this third party. In its submission, the Third Party has also addressed whether this information was provided implicitly or explicitly in confidence.

[47] First, the Third Party noted that the e-mails were sent explicitly in confidence by its legal counsel. It noted that the e-mails contained a standard confidentiality notice at the bottom of the e-mail. I have found that standard automatic confidentiality statements at the end of emails do not, on their own, make the documents confidential. It is just one factor that we consider when determining whether the information was explicitly supplied in confidence. In this case, the confidentiality statement indicates that the e-mail "is confidential and legally privileged". I note that the e-mail was not between the lawyer and the client, but sent on behalf of the client to the Ministry. Legal privilege does not exist. Therefore, I am not satisfied that the disclaimer was explicitly added to the e-mail to supply the information in question in confidence to the Ministry.

[48] The Third Party's submission also stated that it was also provided implicitly in confidence. It stated that it had an expectation that the Ministry would keep the information confidential. This is not the same as having an understanding with the Ministry that specific information would be held in confidence before it was supplied;

which is the requirement for this exemption. It said that “confidentially was understood” because confidentiality is a “fundamental component” of its relationship with the Ministry. It did elaborate on this relationship. Finally, it said that both the Ministry and itself have consistently treated the records “in a manner that indicates a concern for their protection from disclosure and have remained confidential since they were supplied to the Ministry”. It did not indicate how it knew the Ministry has treated the records in this manner.

[49] I am not persuaded that any of the information in question has been supplied implicitly or explicitly in confidence. Subsection 19(1)(b) of FOIP does not apply.

4. Does subsection 19(1)(c) of FOIP apply to the record?

[50] Subsection 19(1)(c) of FOIP provides:

19(1) Subject to Part V and this section, a head shall refuse to give access to a record that contains:

...

(c) information, the disclosure of which could reasonably be expected to:

(i) result in financial loss or gain to;

(ii) prejudice the competitive position of; or

(iii) interfere with the contractual or other negotiations of;

a third party;

[51] For these provisions to apply there must be objective grounds for believing that disclosing the information would result in the harm alleged. The parties do not have to prove that a harm is probable, but need to show that there is a “reasonable expectation of harm” if any of the information were to be released. For all of the subsections of this provision, the following three part test can be applied to determine whether disclosure of records or information could reasonably be expected to cause the harm alleged:

1. Is there a clear cause and effect relationship between the disclosure and the harm which is alleged?
2. Is the harm caused by the disclosure more than trivial or inconsequential?
3. Is the likelihood of the harm genuine and conceivable?

[52] The Ministry applied this exemption to one passage on page 18 of the record. The passage discusses who has ownership of certain parcels of land and who may have a right of claim to the land.

[53] In its submission, the Ministry stated that release of the record could result in an undue loss of revenue, be detrimental to the competitive position of the third party because a competitor had access to this information, and may lead to more difficult contractual negotiations of the third party. It did not elaborate on any specific harms.

[54] The Ministry stated that the passage in question was insider information and could provide the Applicant, who is a competitor to this particular third party, with an unfair advantage.

[55] Ownership of land is public information. Further, the record alludes to the fact that the process should be captured by MARS. In my Review Report 235-2016, I discussed how the information in MARS should be publically available. I do not see a clear cause and effect relationship between the disclosure and a specific harm.

[56] I am not persuaded that subsection 19(1)(c) of FOIP applies to the record.

5. Did the Ministry properly apply subsection 29(1) of FOIP to the record?

[57] Subsection 29(1) of FOIP provides:

29(1) No government institution shall disclose personal information in its possession or under its control without the consent, given in the prescribed manner, of the individual to whom the information relates except in accordance with this section or section 30.

[58] In order for subsection 29(1) to apply, the information severed in the record must first be found to qualify as “personal information” pursuant to subsection 24(1) of FOIP. The Ministry has stated that some information in the record qualifies as personal information pursuant to subsection 24(1)(e) of FOIP. I have also found personal information pursuant to subsections 24(1)(b) and (k) of FOIP. These subsections state:

24(1) Subject to subsections (1.1) and (2), “**personal information**” means personal information about an identifiable individual that is recorded in any form, and includes:

...

(b) information that relates to the education or the criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved;

...

(e) the home or business address, home or business telephone number or fingerprints of the individual;

...

(k) the name of the individual where:

(i) it appears with other personal information that relates to the individual; or

(ii) the disclosure of the name itself would reveal personal information about the individual.

[59] Most of the material severed by the Ministry can be described as business card information such as the names, titles, companies, phone numbers, addresses and e-mail addresses of the authors of the third party e-mails. My office has said in the past that business card information does not qualify as personal information when found with work product. Work product is information generated by or otherwise associated with an individual in the normal course of performing his or her professional or employment responsibilities, whether in a public or private setting. Work product is also not considered personal information.

[60] The Ministry noted that subsection 24(1)(e) explicitly states that the business phone number or address of an individual is personal information. It also noted that subsection 29(1) of FOIP is mandatory and there is no opportunity to exercise discretion in this case. Business phone numbers and addresses would qualify as personal information if the

record was personal in nature. The majority of the records in question qualify as work product, so the business card information does not qualify as personal information. I also note that the Ministry did release the business card information of all of the Ministry employees.

[61] I recommend that the Ministry release all business card information to the Applicant.

[62] Upon review of the record, there are certain other passages that have been severed by the Ministry that do qualify as personal information. One passage discusses the author's views as it relates to his experience at a different job. This qualifies as personal information of the author pursuant to subsection 24(1)(b) of FOIP because it is employment history. Two other passages that are severed multiple times throughout the document describes the authors' vacation time. This would qualify as personal information pursuant to subsection 24(1)(k)(i) of FOIP. The Ministry should continue to withhold this information. Details of these passages are found in Appendix A.

IV FINDINGS

[63] I find that the Ministry did not respond to the Applicant's request within legislated timelines.

[64] I find that subsections 17(1)(a) and 29(1) of FOIP apply to portions of the record.

[65] I find that subsections 19(1)(b) and (c) of FOIP do not apply to the record.

V RECOMMENDATIONS

[66] I recommend that the Ministry monitor its response times closely to ensure that the measures it is taking to improve are effective.

[67] I recommend that the Ministry release more information to the Applicant as described in Appendix A.

Dated at Regina, in the Province of Saskatchewan, this 28th day of March, 2017.

Ronald J. Kruzeniski, Q.C.
Saskatchewan Information and Privacy
Commissioner

Appendix A

Information severed pursuant to subsection 29(1) of FOIP

The following passages qualify as personal information pursuant to subsection 24(1)(b) or (k) of FOIP and should be withheld pursuant to subsection 29(1) of FOIP:

- The third passage severed pursuant to subsection 29(1) on page 386 and all other instances.
- The second passage severed pursuant to subsection 29(1) on page 395 and all other instances.
- The second passage severed pursuant to subsection 29(1) on page 626 and all other instances.

Information severed pursuant to subsection 17(1)(a) of FOIP

Page	Passage on Page	Exemption	Applies?	Withhold/Release
83, 101	1	17(1)(a)	No	Release
392	1	17(1)(a)	No	Release
406	1	17(1)(a)	No	Release
408	1	17(1)(a)	No	Release
	2	17(1)(a)	No	Release
411	1	17(1)(a)	No	Release
	2	17(1)(a)	No	Release
483	1	17(1)(a)	No	Release
	2	17(1)(a)	No	Release
	3	17(1)(a)	No	Release
	4	17(1)(a)	Yes	Withhold
484-495	In full	17(1)(a)	No	Release
496	1	17(1)(a)	No	Release
	2	17(1)(a)	No	Release
	3	17(1)(a)	Yes	Withhold
	4	17(1)(a)	No	Release
	5	17(1)(a)	No	Release
	6	17(1)(a)	No	Release
	7	17(1)(a)	No	Release
498-509	In full	17(1)(a)	No	Release
510	1	17(1)(a)	No	Release
	2	17(1)(a)	No	Release
	3	17(1)(a)	No	Release
	4	17(1)(a)	No	Release
	5	17(1)(a)	Yes	Withhold
	6	17(1)(a)	No	Release

Page	Passage on Page	Exemption	Applies?	Withhold/Release
512	1	17(1)(a)	No	Release
	2	17(1)(a)	No	Release
	3	17(1)(a)	No	Release
	4	17(1)(a)	No	Release
	5	17(1)(a)	No	Release
513	1	17(1)(a)	No	Release
	2	17(1)(a)	No	Release
	3	17(1)(a)	Yes	Withhold
514	1	17(1)(a)	No	Release
	2	17(1)(a)	No	Release
	3	17(1)(a)	No	Release
515	1	17(1)(a)	No	Release
	2	17(1)(a)	No	Release
	3	17(1)(a)	Partly	Withhold in part

Information severed pursuant to subsections 19(1)(b) and (c) of FOIP

Page	Passage on page	Exemption(s)	Applies?	Withhold/Release
2	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
	3	19(1)(b)	No	Release
	4	19(1)(b)	No	Release
	5	19(1)(b)	No	Release
3	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
	3	19(1)(b)	No	Release
4	1	19(1)(b)	No	Release
5	1	19(1)(b)	No	Release
7	1	19(1)(b)	No	Release
8	1	19(1)(b)	No	Release
9	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
11	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
12	1	19(1)(b)	No	Release
13	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release

Page	Passage on page	Exemption(s)	Applies?	Withhold/Release
	3	19(1)(b)	No	Release
	4	19(1)(b)	No	Release
14	1	19(1)(b)	No	Release
16	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
18	1	19(1)(b), 19(1)(c)(i), (ii),(iii)	No	Release
	2	19(1)(b)	No	Release
19	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
20	1	19(1)(b)	No	Release
21	1	19(1)(b)	No	Release
22	1	19(1)(b)	No	Release
25	1	19(1)(b)	No	Release
27	1	19(1)(b)	No	Release
29	1	19(1)(b)	No	Release
30	In full	19(1)(b)	No	Release
31	In full	19(1)(b)	No	Release
33	1	19(1)(b)	No	Release
35	1	19(1)(b)	No	Release
37	1	19(1)(b)	No	Release
40	1	19(1)(b)	No	Release
43	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
45	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
47	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
50	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
53	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
57	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
60	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
62	In full	19(1)(b)	No	Release
63	In full	19(1)(b)	No	Release
64	1	19(1)(b)	No	Release

Page	Passage on page	Exemption(s)	Applies?	Withhold/Release
65	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
67	In full	19(1)(b)	No	Release
70	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
74	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
79	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
108	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
	3	19(1)(b)	No	Release
109	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
120-129	In full	19(1)(b)	No	Release
130	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
	3	19(1)(b)	No	Release
	4	19(1)(b)	No	Release
	5	19(1)(b)	No	Release
	6	19(1)(b)	No	Release
	7	19(1)(b)	No	Release
	8	19(1)(b)	No	Release
	9	19(1)(b)	No	Release
	10	19(1)(b)	No	Release
	11	19(1)(b)	No	Release
	12	19(1)(b)	No	Release
131	1	19(1)(b)	No	Release
132	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
	3	19(1)(b)	No	Release
	4	19(1)(b)	No	Release
	5	19(1)(b)	No	Release
	6	19(1)(b)	No	Release
	7	19(1)(b)	No	Release
	8	19(1)(b)	No	Release
	9	19(1)(b)	No	Release
	10	19(1)(b)	No	Release
	11	19(1)(b)	No	Release
133	1	19(1)(b)	No	Release

Page	Passage on page	Exemption(s)	Applies?	Withhold/Release
	2	19(1)(b)	No	Release
	3	19(1)(b)	No	Release
	4	19(1)(b)	No	Release
134	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
	3	19(1)(b)	No	Release
	4	19(1)(b)	No	Release
	5	19(1)(b)	No	Release
135	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
	3	19(1)(b)	No	Release
	4	19(1)(b)	No	Release
	5	19(1)(b)	No	Release
	6	19(1)(b)	No	Release
	7	19(1)(b)	No	Release
	8	19(1)(b)	No	Release
	9	19(1)(b)	No	Release
	10	19(1)(b)	No	Release
	11	19(1)(b)	No	Release
137	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
	3	19(1)(b)	No	Release
138	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
	3	19(1)(b)	No	Release
	4	19(1)(b)	No	Release
	5	19(1)(b)	No	Release
	6	19(1)(b)	No	Release
	7	19(1)(b)	No	Release
	8	19(1)(b)	No	Release
	9	19(1)(b)	No	Release
	10	19(1)(b)	No	Release
	11	19(1)(b)	No	Release
	12	19(1)(b)	No	Release
	13	19(1)(b)	No	Release
140	In full	19(1)(b)	No	Release
141	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
	3	19(1)(b)	No	Release
	4	19(1)(b)	No	Release

Page	Passage on page	Exemption(s)	Applies?	Withhold/Release
142	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
	3	19(1)(b)	No	Release
	4	19(1)(b)	No	Release
	5	19(1)(b)	No	Release
	6	19(1)(b)	No	Release
143	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
	3	19(1)(b)	No	Release
	4	19(1)(b)	No	Release
	5	19(1)(b)	No	Release
	6	19(1)(b)	No	Release
	7	19(1)(b)	No	Release
	8	19(1)(b)	No	Release
	9	19(1)(b)	No	Release
153	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
	3	19(1)(b)	No	Release
157	In full	19(1)(b)	No	Release
158	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
	3	19(1)(b)	No	Release
168	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
	3	19(1)(b)	No	Release
172	In full	19(1)(b)	No	Release
174	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
	3	19(1)(b)	No	Release
175	1	19(1)(b)	No	Release
179	1	19(1)(b)	No	Release
180	1	19(1)(b)	No	Release
181	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
	3	19(1)(b)	No	Release
185	1	19(1)(b)	No	Release
187	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
	3	19(1)(b)	No	Release
188	1	19(1)(b)	No	Release

Page	Passage on page	Exemption(s)	Applies?	Withhold/Release
192	1	19(1)(b)	No	Release
194	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
195	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
200	1	19(1)(b)	No	Release
201	1	19(1)(b)	No	Release
202	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
	3	19(1)(b)	No	Release
208	1	19(1)(b)	No	Release
210	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
	3	19(1)(b)	No	Release
211	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
216	1	19(1)(b)	No	Release
218	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
	3	19(1)(b)	No	Release
219	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
223	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
	3	19(1)(b)	No	Release
	4	19(1)(b)	No	Release
227	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
228	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
233	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
	3	19(1)(b)	No	Release
	4	19(1)(b)	No	Release
238	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
	3	19(1)(b)	No	Release
	4	19(1)(b)	No	Release
243	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release

Page	Passage on page	Exemption(s)	Applies?	Withhold/Release
244	In full	19(1)(b)	No	Release
245	In full	19(1)(b)	No	Release
246	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
247	In full	19(1)(b)	No	Release
248	In full	19(1)(b)	No	Release
300	In full	19(1)(b)	No	Release
301	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
	3	19(1)(b)	No	Release
	4	19(1)(b)	No	Release
302	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
	3	19(1)(b)	No	Release
303	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
	3	19(1)(b)	No	Release
	4	19(1)(b)	No	Release
364	In full	19(1)(b)	No	Release
365	1	19(1)(b)	No	Release
366	In full	19(1)(b)	No	Release
367	1	19(1)(b)	No	Release
371	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
373	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
	3	19(1)(b)	No	Release
375	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
	3	19(1)(b)	No	Release
376	1	19(1)(b)	No	Release
378	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
	3	19(1)(b)	No	Release
	4	19(1)(b)	No	Release
379	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
381	1	19(1)(b)	No	Release
382	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release

Page	Passage on page	Exemption(s)	Applies?	Withhold/Release
	3	19(1)(b)	No	Release
	4	19(1)(b)	No	Release
383	In full	19(1)(b)	No	Release
384	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
	3	19(1)(b)	No	Release
	4	19(1)(b)	No	Release
	5	19(1)(b)	No	Release
	6	19(1)(b)	No	Release
385	1	19(1)(b)	No	Release
388	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
389	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
	3	19(1)(b)	No	Release
	4	19(1)(b)	No	Release
	5	19(1)(b)	No	Release
390	1	19(1)(b)	No	Release
	2	19(1)(b)	No	Release
391	In full	19(1)(b)	No	Release
394	1	19(1)(b)	No	Release
397	In full	19(1)(b)	No	Release
398	In full	19(1)(b)	No	Release
399	1	19(1)(b)	No	Release
400	In full	19(1)(b)	No	Release
401	In full	19(1)(b)	No	Release
402	1	19(1)(b)	No	Release
738-742	In full	19(1)(b)	No	Release
743	1	19(1)(b)	No	Release
763	1	19(1)(b)	No	Release
783-787	In full	19(1)(b)	No	Release