



REVIEW REPORT 108-2022

Ministry of Agriculture

November 15, 2022

Summary: The Applicant submitted an access to information request to the Ministry of Agriculture (Agriculture). Agriculture consulted with a third party. Agriculture ultimately made the decision to release 146 pages of records, with portions redacted pursuant to subsections 19(1)(b) and 29(1) of *The Freedom of Information and Protection of Privacy Act* (FOIP). The Applicant appealed to the Commissioner. The Commissioner found that Agriculture properly applied subsections 19(1)(b) and 29(1) of FOIP to a small portion of the responsive records, but not to all the portions to which Agriculture applied the exemptions. The Commissioner recommended that Agriculture continue to withhold the portions where he found Agriculture properly applied subsections 19(1)(b) and 29(1) of FOIP, but to release the remainder to the Applicant

I BACKGROUND

[1] On March 11, 2022, the Ministry of Agriculture (Agriculture) received the following access to information request:

[Name 1] Barn LSD [Land Description].

- Land Location [Name 2] Barn-BLK/ Par A Plan [Number] Ext 00. Rm 335
- Spread sheets of volume of application and Land Location plus approval of new lands being spread on for past 15 years.

[Name 1] Barn LSD [Land Description].

Land Locations. [Name 2] Barn BIK/Par A-plan [Number] Ext 00. Rm 335. Original Land, Sign up Sheet for the approval of these barns.

- [Name of Agriculture Employee]'s file, or report, and detail accounts of discussion [sic] that took place at RM meeting in Okla office, 2010 or 2011.

- Copy of water tests that were done. Plus complaints to [Name of Agriculture Employee].

[2] On March 15, 2022, Agriculture emailed a third party business, Olymel, pursuant to section 34 of *The Freedom of Information and Protection of Privacy Act* (FOIP). Agriculture advised the third party that it (Agriculture) had received an access to information request which contains information as described in subsection 19(1) of FOIP. Agriculture said it was considering releasing the information pursuant to subsection 19(3) of FOIP, but that section 34 of FOIP required it to provide notice to Olymel so that Olymel can make representations as to why access should be denied. Agriculture attached a copy of the records to the email.

[3] In an undated letter, Olymel provided a response to Agriculture. Olymel indicated it was willing to “release some of the data you are looking to provide”. However, Olymel objected to the release of the names and land locations of farms. Olymel explained:

Releasing the information identifying farmers and land locations would cause undue hardship for the farmers involved and cause irreparable harm to our farmer relationships, which are critical for our operations in the Lintlaw area.

[4] In a letter dated April 20, 2022, Agriculture responded to the Applicant. Agriculture said:

Certain records you have requested contain third party information and are redacted subject to provisions in subsection 19(1)(b) of *The Freedom of Information and Protection of Privacy Act* (the Act). Additionally, some of the information in the attached records has been redacted because it contains personal information as defined under section 24 of the Act.

[5] Then, in another email dated April 25, 2022, Agriculture contacted Olymel. Attached to the email was a 10-page document. Agriculture asked Olymel to highlight the areas in the document over which Olymel has “3rd party concerns”.

[6] In an email dated April 28, 2022, Olymel responded to Agriculture. Olymel indicated it was okay with the records being released if the names, phone numbers and land locations were redacted. It also noted that pages 8, 9, and 10 of the 10-page document make third parties “readily identifiable”.

- [7] On May 25, 2022, my office received a request for review from the Applicant.
- [8] On July 21, 2022, my office notified Agriculture, Olymel, and the Applicant that it would be undertaking a review.
- [9] On September 19, 2022, my office received a submission from Agriculture.
- [10] My office did not receive a submission from the third party or the Applicant.

II RECORDS AT ISSUE

- [11] In a review, my office asks that government institutions provide the records at issue and an index of records. The records at issue are the records that are redacted in part or in full. The records at issue should be paginated.
- [12] In this case, there are 297 pages of records at issue. I derived this number based on the number of pages of records provided by Agriculture to the third party in its email dated March 15, 2022. Attached to that email, there were 287 pages of records provided to the third party. Then, in its email dated April 25, 2022, Agriculture provided an additional 10 pages of records for the third party to review.
- [13] The total number of records provided to the Applicant was 146 pages (which Agriculture redacted in part). Based on a review of the 146 pages provided to the Applicant, I note that 11 of the 146 pages were not a part of the 297 pages that Agriculture provided to Olymel. Agriculture provided these 11 pages in full to the Applicant, so these 11 pages are not at issue in this review. However, Agriculture did not provide 161 pages of the 297 to the Applicant. In other words, 161 pages were redacted in full and withheld from the Applicant.
- [14] Agriculture prepared an index of records that reflected the 146 pages of records it provided to the Applicant, in part. It should have prepared an index of records that reflects the 297 pages of records at issue.

[15] In the interest of efficiency, my office has organized the records at issue as follows:

- Record 1 is the 287 pages of records that were attached to Agriculture’s email dated March 15, 2022 to Olymel. My office has paginated the pages from 1 to 287.
- Record 2 is the 10-page document that was attached to Agriculture’s email dated April 25, 2022 to Olymel. My office has paginated the pages from 1 to 10.

[16] The records are related to waste or manure management plans, including manure application agreements, inspection reports, and a complaint regarding the application of manure.

[17] The Appendix will have greater detail regarding my findings and recommendations for each record and page.

III DISCUSSION OF THE ISSUES

1. Do I have jurisdiction?

[18] Agriculture is a “government institution” as defined by subsection 2(1)(d)(i) of FOIP. Therefore, I find that I have jurisdiction to conduct this review.

[19] Olymel is a “third party” as defined by subsection 2(1)(j) of FOIP.

2. Did Agriculture properly apply subsection 19(1)(b) of FOIP?

[20] In its submission, Agriculture provided arguments as to how subsection 19(1)(b) of FOIP applies to the records withheld from the Applicant.

[21] 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;

[22] My office uses the following three-part test to determine if subsection 19(1)(b) of FOIP applies:

1. Is the information financial, commercial, scientific, technical or labour relations information of a third party?
2. Was the information supplied by the third party to a government institution?
3. Was the information supplied in confidence implicitly or explicitly?

(*Guide to FOIP*, Chapter 4, “Exemptions from the Right of Access”, updated April 30, 2021 [*Guide to FOIP*, Ch. 4], pp. 198-202)

[23] The following is an analysis to determine if the three-part test has been met.

1. Is the information financial, commercial, scientific, technical or labour relations information of a third party?

[24] In its submission, Agriculture asserted that the redacted information is “commercial in nature”. It said:

The information is related to manure spreading pricing and client information. Releasing records containing identifiable client information and Olymel’s pricing structure would have a negative effect to their business in relation to trust and competitive position within the industry.

[25] “Commercial information” is information relating to the buying, selling or exchange of merchandise or services. This can include third party associations, past history, references and insurance policies and pricing structures, market research, business plans, and customer records (*Guide to FOIP*, Ch. 4, p. 198).

[26] Based on a review of the records, my office noted that some of the redacted information would be commercial information. This includes manure application agreements between

Olymel and farmers/producers. Such agreements include a breakdown of the fees to be paid per acre and total dollar amounts agreed to be paid.

- [27] However, I do not find that all the redacted information qualifies as commercial information. For example, the analytical laboratory reports of manure samples are not commercial information. However, such information qualifies as “scientific information.” My office’s *Guide to FOIP* defines “scientific information” as:

Scientific information is information exhibiting the principles or methods of science. The information could include designs for a product and testing procedures or methodologies. It is information belonging to an organized field of knowledge in the natural, biological or social sciences or mathematics. In addition, for information to be characterized as scientific, it must relate to the observation and testing of specific hypothesis or conclusions and be undertaken by an expert in the field. Finally, scientific information must be given a meaning separate from technical information.

(*Guide to FOIP*, Ch. 4, p. 198-199)

- [28] Not all of the redacted information, though, qualifies as commercial or scientific information. Nor would the information qualify as financial, technical or labour relations information. For example, Agriculture redacted the business telephone or fax numbers of the third party or of a rural municipality on pages 202, 235, 237, 253, 256, and 274 of Record 1 does not qualify as financial, commercial, scientific, technical or labour relations information. Further, the 10 pages of Record 2 contains information such as the Applicant’s concerns. Such information is not financial, commercial, scientific, technical or labour relations information. The first part of the test is not met for such information. I will, however, still consider such information in my analysis of subsection 29(1) of FOIP later in this Report.

- [29] Therefore, I am satisfied that only some of the information meets the first part of the test.

2. Was the information supplied by the third party to a government institution?

- [30] “Supplied” means provided or furnished. Information may qualify as “supplied” if it was directly supplied to a government institution by a third party, or where its disclosure would

reveal or permit the drawing of accurate inferences with respect to information supplied by a third party (*Guide to FOIP*, Ch. 4, p. 200).

[31] Records can still be “supplied” even when they originate with the government institution (i.e., the records still may contain or repeat information extracted from documents supplied by the third party). However, the third party objecting to disclosure will have to prove that the information originated with it and that it is confidential (*Guide to FOIP*, Ch. 4, p. 200).

[32] In its submission, Agriculture said:

...the information was supplied by the third party to the Ministry of Agriculture for the purpose of site inspections pursuant to the *Agricultural Operations Act*. This information consisted of manure spreading applications, reinspection reports and communication between Olymel and the Ministry of Agriculture.

[33] Based on a review of the records, I note that Olymel supplied information to Agriculture for the purpose of site inspections pursuant to *The Agricultural Operations Act*, including manure application agreements and information recorded in inspection reports. Next, I will need to consider whether the information was supplied in confidence from Olymel to Agriculture.

3. Was the information supplied in confidence implicitly or explicitly?

[34] “In confidence” usually describes a situation of mutual trust in which private matters are relayed or reported. Information obtained in confidence means that the supplier of the information has stipulated how the information can be disseminated. For confidence to be found, there must be an implicit or explicit agreement or understanding of confidentiality on the part of both the government institution and the third-party providing the information (*Guide to FOIP*, Ch. 4, p. 202).

[35] In its submission, Agriculture asserted that the information was supplied in confidence implicitly.

[36] Earlier, I quoted Agriculture as saying that the information was supplied pursuant to *The Agricultural Operations Act*. When there is a compulsory legislative requirement to supply information, the information will not ordinarily be confidential. The exception to this is if the relevant legislation expressly states that such information is deemed to have been supplied in confidence (*Guide to FOIP*, Ch. 4, p. 204; [Review Report 172-2019](#) at paragraph [30]).

[37] Section 19 of *The Agricultural Operations Act* requires that a person with an intensive livestock operation to operate it in accordance with a waste storage plan approved by the Minister of Agriculture. Section 19 of *The Agricultural Operations Act* provides:

19(1) No person shall store the waste from an intensive livestock operation that belongs to a class prescribed as a class of intensive livestock operation for which a waste storage plan is required, except in accordance with a waste storage plan approved by the minister.

(2) No person shall manage the waste from an intensive livestock operation that belongs to a class prescribed as a class of intensive livestock operation for which a waste management plan is required, except in accordance with a waste management plan approved by the minister.

[38] Section 8 of *The Agricultural Operations Regulations* sets out what types of information must be provided, including written agreements with landowners and the location of the lands to be used for manure application:

8(1) A waste management plan for land utilization of manure produced from an intensive livestock operation must:

(a) provide the annual volume of manure produced, based on accepted standard values or specific management practices;

(b) estimate the nutrient level of nitrogen, phosphate and potassium in the manure as determined by accepted standard values or by specific manure testing;

(c) specify whether the form of the manure is solid or liquid;

(d) specify the method of manure application and the season of application;

(e) specify the expected crop nutrient requirements based on the crop production area or on specific cropping practices;

(f) specify the annual rate of manure application based on estimated crop nutrient requirements and accepted manure utilization factors;

(g) specify the land area available for the annual application of manure;

(h) provide written agreements to spread manure on land other than land controlled by the person who operates the intensive livestock operation where that person does not control sufficient land for the safe utilization of the manure from the intensive livestock operation;

(i) provide a map to identify the location of lands to be used for manure application; and

(j) provide any additional information that may be required by the minister.

[Emphasis added]

[39] Neither *The Agricultural Operations Act* nor *The Agricultural Operations Regulations* expressly state that such information is deemed to have been supplied in confidence. This would include agreements between Olymel and farmers/producers and the legal land descriptions of the lands used for manure application. As such, I find that the information that was legislatively required to be supplied is information that was not supplied in confidence. I find that Agriculture did not properly apply subsection 19(1)(b) of FOIP to the information that Olymel is legislatively required to provide to Agriculture.

[40] However, I am satisfied that other information that is not legislatively required to be supplied, such as the fees to be paid per acre and the total dollar amounts to be paid found within the manure application agreements between Olymel and the farmers/producers was supplied in confidence. I find that Agriculture properly applied subsection 19(1)(b) of FOIP to this type of information that is not legislatively required to be supplied.

[41] The Appendix summarizes my findings and recommendations.

3. Did Agriculture properly apply subsection 29(1) of FOIP?

[42] In its letter dated April 20, 2022 to the Applicant, Agriculture said it was redacting information that qualified as “personal information” as defined under section 24 of FOIP.

To determine if information is personal information pursuant to subsection 24(1) of FOIP, it must be: 1) about an identifiable individual, and 2) personal in nature.

[43] When a government institution identifies “personal information” of a third party individual in a record, it should be relying on subsection 29(1) of FOIP to withhold the information. 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.

[44] In its submission, Agriculture did not provide any arguments as to how information qualifies as “personal information” as defined by subsection 24(1) of FOIP. Therefore, my office must make the determination on the face of the record.

[45] Based on a review of the records provided to the Applicant, Agriculture wrote the letters “PI” next to the redacted information it identified as personal information. The redacted information included the telephone numbers for the Rural Municipality of Hazel Dell, producers/farmers, and Olymel employees, as well as the names of producers/farmers.

[46] In the past, I have found that “business card information” of individuals acting in a work-related capacity is information that is not personal in nature. ([Review Report 301-2019](#) at paragraphs [13] to [15]). As such, the telephone numbers for the Rural Municipality of Hazel Dell No. 335 as well as Olymel employees do not qualify as personal information as defined by subsection 24(1) of FOIP. I find, therefore, that Agriculture did not properly apply subsection 29(1) of FOIP to this type of information as it appears in the records.

[47] Regarding the telephone numbers of producers/farmers, where the telephone number is the individual’s home telephone number, such information qualifies as personal information pursuant to subsection 24(1)(e) of FOIP. As such, I find that Agriculture properly applied subsection 29(1) of FOIP to the home telephone numbers of producers/farmers as this type of information appears in the records.

[48] The Appendix summarizes my findings and recommendations.

4. Did Agriculture meet its obligations under section 8 of FOIP?

[49] Section 8 of FOIP provides:

8 Where a record contains information to which an applicant is refused access, the head shall give access to as much of the record as can reasonably be severed without disclosing the information to which the applicant is refused access.

[50] “Severability” is the principle described in section 8 of FOIP requiring that information be disclosed if it does not contain, or if it can be reasonably severed from, other information that the head of a government institution is authorized or obligated to refuse to disclose under the Act (*Guide to FOIP*, Chapter 3, “Access to Records, updated June 29, 2021 [Guide to FOIP, Ch. 3], p. 44).

[51] In order to comply with section 8 of FOIP, a line-by-line analysis of the record at issue is required to determine which exemptions apply to which portions of the record and what can reasonably be severed. The government institution is required to sever those portions that may qualify for a mandatory or discretionary exemption and release the balance of the record to the applicant.

[52] For the 146 pages that Agriculture provided to the Applicant, I note that Agriculture did indeed sever portions of the records to which it believes exemptions applied and released the remainder to the Applicant pursuant to section 8 of FOIP.

[53] However, as I mentioned earlier, Agriculture withheld 161 pages of records in full from the Applicant. It does not appear Agriculture conducted a line-by-line review of these 161 pages of records.

[54] Further, in its letter to the Applicant dated April 20, 2022, Agriculture did not inform the Applicant that it was withholding 161 pages of records in full from them. While

government institutions have the ability to withhold records in full, they should inform applicants of the number of pages they are withholding in full as part of their duty to assist to respond to access requests openly, accurately and completely pursuant to subsection 5.1(1) of FOIP.

[55] I find that Agriculture has not met its obligations under section 8 of FOIP. I recommend that Agriculture develop and implement policies and/or procedures to ensure it is processing access to information requests pursuant to section 8 of FOIP.

IV FINDINGS

[56] I find that Agriculture did not properly apply subsection 19(1)(b) of FOIP to the information that Olymel is legislatively required to provide to Agriculture (see Appendix).

[57] I find that Agriculture properly applied subsection 19(1)(b) of FOIP to some of the information that is not legislatively required to be supplied (see Appendix)

[58] I find Agriculture did not properly apply subsection 29(1) of FOIP as I outlined at paragraph [46] of this Report (see Appendix).

[59] I find that Agriculture properly applied subsection 29(1) of FOIP to the home telephone numbers of producers/farmers as I outlined at paragraph [47] of this Report (see Appendix).

[60] I find that Agriculture has not met its obligations under section 8 of FOIP.

V RECOMMENDATIONS

[61] I recommend that Agriculture develop and implement policies and/or procedures to ensure it is processing access to information requests pursuant to section 8 of FOIP.

[62] I recommend that Agriculture continue to withhold or release information in the records as set out in the Appendix.

Dated at Regina, in the Province of Saskatchewan, this 15th day of November, 2022.

Ronald J. Kruzeniski, K.C.
Saskatchewan Information and Privacy
Commission

Appendix				
Record 1				
OIPC Review Page Number	Applicant's Copy Page Number	Exemptions applied by Agriculture Released by Agriculture	IPC Finding	IPC Recommendation
1	1	19(1)(b) of FOIP	19(1)(b) of FOIP does not apply.	Release.
2		Withheld in full – no exemption cited.	19(1)(b) of FOIP does not apply.	Release.
3		Withheld in full – no exemption cited.	19(1)(b) of FOIP does not apply.	Release.
4		Withheld in full – no exemption cited.	19(1)(b) of FOIP does not apply.	Release.
5		Withheld in full – no exemption cited.	19(1)(b) of FOIP does not apply.	Release.
6		Withheld in full – no exemption cited.	19(1)(b) of FOIP does not apply.	Release.
7		Withheld in full – no exemption cited.	19(1)(b) of FOIP does not apply.	Release.
8		Withheld in full – no exemption cited.	19(1)(b) of FOIP does not apply.	Release.
9		Withheld in full – no exemption cited.	19(1)(b) of FOIP does not apply.	Release.
10		Withheld in full – no exemption cited.	19(1)(b) of FOIP does not apply.	Release.
11		Withheld in full – no exemption cited.	19(1)(b) of FOIP does not apply.	Release.
12		Withheld in full – no exemption cited.	19(1)(b) of FOIP applies to the dollar amounts in the columns “Fee per Acre”, “Early payment discount per acre” and “Net Fee/Acre”.	Withhold dollar amounts in the columns “Fee per Acre”, “Early payment discount per acre” and “Net Fee/Acre” pursuant to 19(1)(b) of FOIP. Release remainder.
13	2	19(1)(b) of FOIP.	19(1)(b) of FOIP does not apply.	Release.
14	3	19(1)(b) of FOIP.	19(1)(b) of FOIP does not apply.	Release.
15	4	19(1)(b) of FOIP.	19(1)(b) of FOIP does not apply.	Release.
16	5	19(1)(b) of FOIP.	19(1)(b) of FOIP does not apply.	Release.
17		Withheld in full – no exemption cited.	19(1)(b) applies to the dollar amounts in the columns “Early payment discount per acre” and “Net Fee/Acre”.	Withhold dollar amounts in the columns “Early payment discount per acre” and “Net Fee/Acre” pursuant to 19(1)(b) of FOIP. Release remainder.

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18	64	Released		
19 to 47		Withheld in full – no exemption cited.	19(1)(b) of FOIP does not apply.	Release.
48	6	Released		
49	7	Names redacted pursuant to 19(1)(b) of FOIP.	19(1)(b) of FOIP does not apply.	Release.
50	8	Released		
51	9	Names redacted pursuant to 19(1)(b) of FOIP.	19(1)(b) of FOIP does not apply.	Release.
52	10	Names redacted pursuant to 19(1)(b) of FOIP.	19(1)(b) of FOIP does not apply.	Release.
53	11	Names redacted pursuant to 19(1)(b) of FOIP.	19(1)(b) of FOIP does not apply.	Release.
54	12	Names redacted pursuant to 19(1)(b) of FOIP.	19(1)(b) of FOIP does not apply.	Release.
55	13	Names redacted pursuant to 19(1)(b) of FOIP.	19(1)(b) of FOIP does not apply.	Release.
56	14	Names redacted pursuant to 19(1)(b) of FOIP.	19(1)(b) of FOIP does not apply.	Release.
57	15	Names redacted pursuant to 19(1)(b) of FOIP.	19(1)(b) of FOIP does not apply.	Release.
58	16	Names redacted pursuant to 19(1)(b) of FOIP.	19(1)(b) of FOIP does not apply.	Release.
59	17	Names redacted pursuant to 19(1)(b) of FOIP.	19(1)(b) of FOIP does not apply.	Release.
60	18	Released		
61	19	Released		
62	20	Released		
63	21	Released		
64 to 93		Withheld in full – no exemption cited.	19(1)(b) of FOIP does not apply.	Release.
94	22	Released		
95 to 116	23 to 44	Names redacted pursuant to 19(1)(b) of FOIP.	19(1)(b) of FOIP does not apply.	Release.
117	45	Released		
118 to 121	46 to 49	Names redacted pursuant to 19(1)(b) of FOIP.	19(1)(b) of FOIP does not apply.	Release.
122	50	Released		
123	51	Released		
124	52	Names redacted pursuant to 19(1)(b) of FOIP.	19(1)(b) of FOIP does not apply.	Release.
125	53	Released		
126	54	Released		

127 to 132	55 to 60	Names redacted pursuant to 19(1)(b) of FOIP.	19(1)(b) of FOIP does not apply.	Release.
133	61	Released		
134	62	Released		
135	63	Names redacted pursuant to 19(1)(b) of FOIP.	19(1)(b) of FOIP does not apply.	Release.
136		Withheld in full – no exemption cited.	19(1)(b) of FOIP does not apply.	Release.
137 to 195		Withheld in full – no exemption cited.	19(1)(b) of FOIP does not apply.	Release.
196		Withheld in full – no exemption cited.	19(1)(b) of FOIP applies to the dollar amounts in the columns “Early payment discount per acre” and “Net Fee/Acre”. 29(1) of FOIP applies to the home telephone number.	Withhold dollar amounts in the columns “Early payment discount per acre” and “Net Fee/Acre” pursuant to 19(1)(b) of FOIP. Withhold the home telephone number pursuant to 29(1) of FOIP. Release remainder.
197			19(1)(b) of FOIP applies to the dollar amounts in the columns “Early payment discount per acre” and “Net Fee/Acre”.	Withhold dollar amounts in the columns “Early payment discount per acre” and “Net Fee/Acre” pursuant to 19(1)(b) of FOIP. Release remainder.
198		Withheld in full – no exemption cited.	29(1) of FOIP applies to the home telephone numbers in the “Phone” column.	Withhold home telephone numbers in the “Phone” column pursuant to 29(1) of FOIP. Release remainder.
199		Withheld in full – no exemption cited.	29(1) of FOIP applies to the home telephone numbers in the “Phone” column.	Withhold home telephone numbers in the “Phone” column pursuant to 29(1) of FOIP. Release remainder.
200			19(1)(b) of FOIP applies to the dollar amounts in the columns “Early payment discount per acre” and “Net Fee/Acre”.	Withhold dollar amounts in the columns “Early payment discount per acre” and “Net Fee/Acre” pursuant to 19(1)(b) of FOIP.

			29(1) of FOIP applies to the home telephone number.	Withhold the home telephone number pursuant to 29(1) of FOIP. Release remainder.
201	65	Released		
202	66	19(1)(b); 29(1) of FOIP.	19(1)(b) of FOIP does not apply. 29(1) of FOIP does not apply.	Release.
203	144	Released		
204	146	Released		
205	67	19(1)(b) of FOIP.	19(1)(b) of FOIP does not apply.	Release.
206	68	Released		
207	69	Released		
208 to 210		Withheld in full – no exemption cited.		Release.
211		Withheld in full – no exemption cited.	19(1)(b) of FOIP applies to the dollar amounts in the columns “Base Fee per Acre”, “Early payment Discount per Acre”, “Net Fee/Acre”, “Total Due by Dec 31, 2010”, “Total Due After Dec 31, 2010” pursuant to 19(1)(b) of FOIP.	Withhold dollar amounts in the columns “Base Fee per Acre”, “Early payment Discount per Acre”, “Net Fee/Acre”, “Total Due by Dec 31, 2010”, “Total Due After Dec 31, 2010” pursuant to 19(1)(b) of FOIP. Release remainder.
212		Withheld in full – no exemption cited.		Release.
213		Withheld in full – no exemption cited.	19(1)(b) of FOIP applies to the dollars amounts in the columns “Early Payment Discount Per Acre”, “Net Fee/Acre” pursuant to 19(1)(b) of FOIP.	Withhold dollar amounts in the columns “Early Payment Discount Per Acre”, “Net Fee/Acre” pursuant to 19(1)(b) of FOIP.
214 to 219		Withheld in full – no exemption cited.		Release.
220		Withheld in full – no exemption cited.	29(1) of FOIP applies to the phone number.	Withhold the phone number pursuant to 29(1) of FOIP. Release remainder.
221		Withheld in full – no exemption cited.		Release.
222	70	19(1)(b) of FOIP.	19(1)(b) of FOIP does not apply.	Release.

223	71	19(1)(b) of FOIP.	19(1)(b) of FOIP does not apply.	Release.
224	72	19(1)(b) of FOIP.	19(1)(b) of FOIP does not apply.	Release.
225	73	19(1)(b) of FOIP.	19(1)(b) of FOIP does not apply.	Release.
226	74	19(1)(b) of FOIP.	19(1)(b) of FOIP does not apply.	Release.
227	75	Released		
228	76	Released		
229				Release.
230				Release.
231	77	19(1)(b) of FOIP.	19(1)(b) of FOIP does not apply.	Release.
232	78	19(1)(b) of FOIP.	19(1)(b) of FOIP does not apply.	Release.
233	79	19(1)(b); 29(1) of FOIP.	29(1) of FOIP applies to the seven-digit phone number that appears in the email dated November 18, 2010 timestamped 8:37 a.m.	Withhold the seven-digit phone number in the email dated November 18, 2010 timestamped 8:37 a.m. pursuant to 29(1) of FOIP. Release remainder.
234	80	19(1)(b); 29(1) of FOIP.	Neither 19(1)(b) nor 29(1) of FOIP apply.	Release.
235	81	19(1)(b); 29(1) of FOIP.	Neither 19(1)(b) nor 29(1) of FOIP apply.	Release.
236	82	Released		
237	83	19(1)(b); 29(1) of FOIP.	Neither 19(1)(b) nor 29(1) of FOIP apply.	Release.
238 to 249	84 to 95	Released		
250	96	19(1)(b) of FOIP.	19(1) of FOIP does not apply.	Release.
251	97	Released		
252	98	19(1)(b) of FOIP.	19(1) of FOIP does not apply.	Release.
253	99	19(1)(b); 29(1) of FOIP.	Neither 19(1)(b) nor 29(1) of FOIP apply.	Release.
254	100	Released		
255	101	Released		
256	102	19(1)(b); 29(1) of FOIP.	Neither 19(1)(b) nor 29(1) of FOIP apply.	Release.
257 to 267	103 to 113	Released		
268	114	19(1)(b) of FOIP	19(1)(b) of FOIP does not apply.	Release.
269 to 271	115 to 117	Released		
272	118	19(1)(b) of FOIP	19(1)(b) of FOIP does not apply.	Release.
273	119	Released		
274	120	19(1)(b); 29(1) of FOIP.	Neither 19(1)(b) nor 29(1) of FOIP apply.	Release.
275 to 287	121 to 133	Released		
Pages 134 to 143 and 145 were provided to the Applicant				
Record 2				

OIPC Review Page Number	Applicant's Copy Page Number	Exemptions applied by Agriculture Released OR by Agriculture	Finding	Recommendation
1		Withheld in full – no exemption cited.		Release.
2		Withheld in full – no exemption cited.		Release.
3		Withheld in full – no exemption cited.		Release.
4		Withheld in full – no exemption cited.	29(1) of FOIP applies to the phone number of renter in the notes dated November 18, 2010.	Withhold the phone number in the November 18, 2010 notes pursuant to 29(1) of FOIP. Release remainder.
5		Withheld in full – no exemption cited.		Release.
6		Withheld in full – no exemption cited.		Release.
7		Withheld in full – no exemption cited.		Release.
8		Withheld in full – no exemption cited.		Release.
9		Withheld in full – no exemption cited.		Release.
10		Withheld in full – no exemption cited.	19(1)(b) of FOIP applies to the dollar amounts in the “Base Fee per Acre”, “Early Payment Discount Per Acre”, “Net Fee/Acre”, “Total Due by December 31, 2010” and “Total Due After December 31, 2010” columns.	Withhold the dollar amounts in the “Base Fee per Acre”, “Early Payment Discount Per Acre”, “Net Fee/Acre”, “Total Due by December 31, 2010” and “Total Due After December 31, 2010” columns pursuant to 19(1)(b) of FOIP.