

August 27, 2026

BY EMAIL - PRIVATE AND CONFIDENTIAL

Bruce Keating
President & Chief Executive Officer
Newfoundland and Labrador Liquor Corporation
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Keri-Lynn Power, LLB (Hons), LLM
Committee Chair
ATIPPA Statutory Review Committee 2025
2nd Floor, Beothuck Building
20 Crosbie Place
St. John's, NL A1B 3Y8

Re: Statutory Review of the Access to Information and Protection of Privacy Act, 2015

Dear Ms. Power,

Thank you for the opportunity to provide input to the statutory review of the Access to Information and Protection of Privacy Act, 2015 (ATIPPA, 2015).

The Newfoundland and Labrador Liquor Corporation (NLC) is a Crown corporation operating in a commercial environment while also fulfilling its obligations as a public body under ATIPPA. We appreciate the importance of the review process and the Committee's focus on ensuring that the legislation continues to support transparency, accountability, and the protection of personal information in an evolving technological and privacy landscape.

From NLC's perspective, the operational impact of ATIPPA is relatively limited compared with many parts of core government. The Corporation typically receives approximately 10 to 15 access requests annually. These requests are generally straightforward in nature and have not imposed a significant administrative burden on the organization. NLC has found that the existing legislative framework provides an effective basis for responding to requests and meeting its obligations under the Act.

Consistent with this experience, NLC does not have any significant concerns regarding the current operation of ATIPPA, nor do we have specific recommendations for legislative amendment arising from our own experience. The existing framework has generally worked well for the Corporation and has allowed us to balance our responsibilities for transparency and privacy protection in a practical and effective manner.

While we are not advancing specific proposals, NLC recognizes that other public bodies, stakeholders, subject matter experts, and members of the public may identify opportunities to strengthen the legislation, particularly in areas contemplated by the Terms of Reference, including privacy protection, emerging technologies, privacy governance, and breach management. Should the Committee conclude that enhancements are warranted in these or other areas within the scope of the review, NLC would be supportive of measures that strengthen the overall effectiveness of the legislation while maintaining a practical and workable framework for public bodies.

We appreciate the opportunity to contribute to the review and would be pleased to provide any additional information that may assist the Committee in its work.

Yours truly,

A handwritten signature in black ink, appearing to read 'Bruce Keating', with a stylized flourish at the end.

Bruce Keating

President & Chief Executive Officer
Newfoundland and Labrador Liquor Corporation