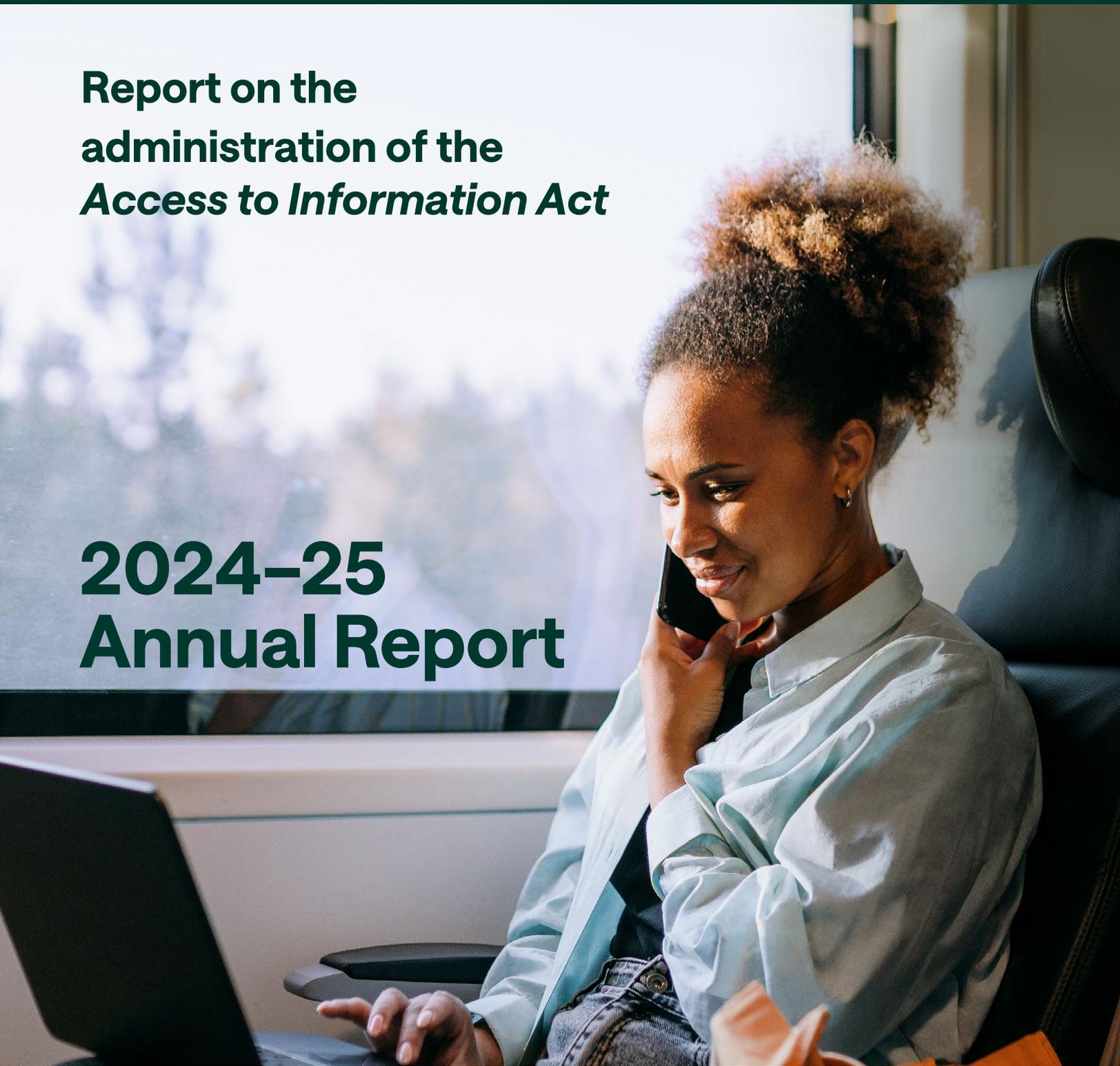


**Report on the
administration of the
*Access to Information Act***

**2024–25
Annual Report**



ALTO 

High-Speed Train

Annual Report 2024-25

Access to Information Act

VIA HFR – VIA TGF Inc.

1. INTRODUCTION

The *Access to Information Act* (“**ATIA**”) provides a right of access to information in records under the control of government institutions, including any parent Crown corporation and any wholly owned subsidiary of such a corporation within the meaning of subsection 83(1) of the *Financial Administration Act*. This right of access is consistent with the principles that government information should be available to the public, that necessary exceptions to the right of access should be limited and specific, and that decisions on the disclosure of government information should be reviewed independently of government. The ATIA also contains requirements for the proactive publication of certain information.

This Annual Report 2024-25, prepared by VIA HFR – VIA TGF Inc. (operating under the name Alto) (the “**Institution**”) and covering the period from April 1, 2024 to March 31, 2025 (the “**reporting period**”), is tabled in Parliament pursuant to section 94 of the ATIA. This is the Institution’s second report.

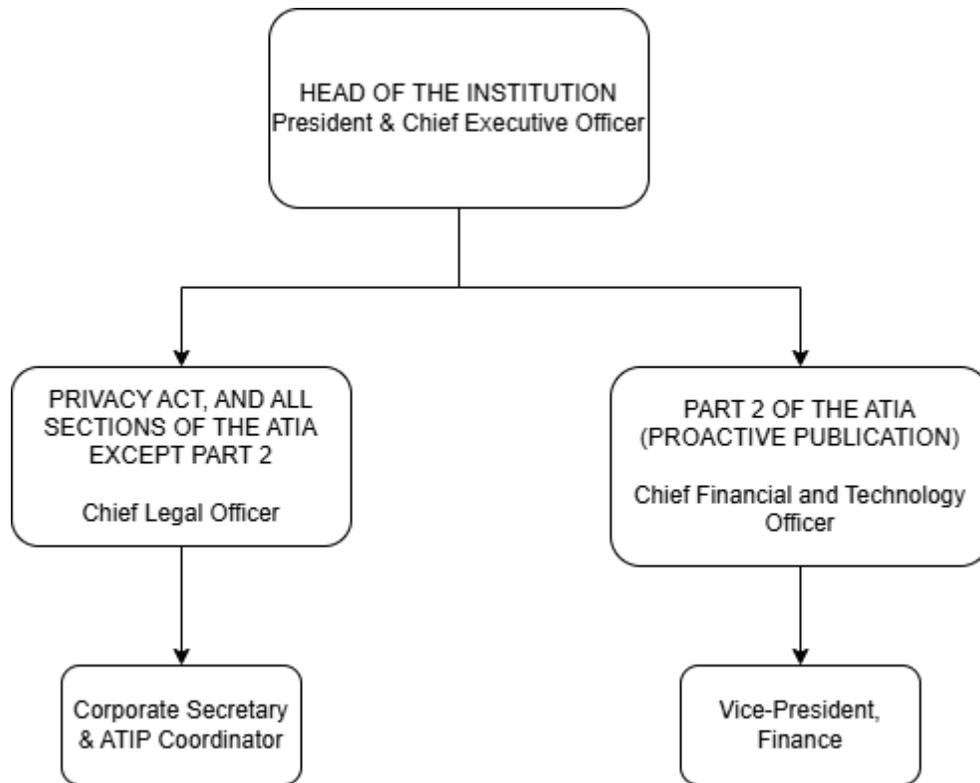
The Institution is a federal Crown corporation whose mandate, per Order in Council P.C. 2022-0259, is to “develop and implement the High Frequency Rail project, including the design, construction, financing, operation and maintenance of passenger rail services in Ontario and Quebec through one or more agreements with the private sector, in cooperation with the Minister of Transport”. In February 2025, the Institution received additional direction from the Government of Canada to develop a high-speed rail service, partnering with Cadence, the private developer partner.

The Institution had no non-operating subsidiaries during the reporting period.

2. ORGANIZATIONAL STRUCTURE

The Institution is a wholly-owned subsidiary of VIA Rail Canada Inc. but operates at arm’s length from it and acts as a parent Crown corporation under the *Financial Administration Act*, with certain exceptions, pursuant to Order in Council P.C. 2022-0260. The Institution was incorporated on November 29, 2022 under the *Canada Business Corporations Act*, and became operational in 2023. It reports directly to Parliament through the Minister of Transport and Internal Trade.

The following is the organizational structure of the Institution’s Access to Information and Privacy Office as of March 31, 2025.



For a breakdown of the group(s) and/or position(s) responsible for meeting each applicable proactive publication requirement under Part 2 of the ATIA, see the section “Proactive Publication under Part 2 of the ATIA” below.

No services were invoiced to the Institution during the reporting period for assistance in fulfilling access to information obligations.

The Institution was not party to any service agreement under section 96 of the ATIA during the reporting period.

3. DELEGATION ORDER

A delegation of all powers and responsibilities of the head of the Institution under the ATIA (with the exception of proactive publication requirements under Part 2 of the ATIA, which are not subject to formal delegation) was formalized and documented at the beginning of the reporting period and updated most recently on October 15, 2024. This delegation remained in effect throughout the reporting period and is attached hereto as **Schedule A**.

4. PERFORMANCE

During the reporting period, the Institution received twenty-eight (28) requests for access to information under the ATIA:

- Twenty (20) requests were processed within the reporting period, and all of those (100%) were processed within prescribed deadlines.
 - None of those twenty (20) requests required a time extension (0%).
 - All (20) requests were processed within 16 to 30 days (100%).
 - One (1) request resulted in full disclosure (5%).
 - Fifteen (15) requests resulted in partial disclosure (75%).
 - No records existed in response to the remaining four (4) requests (20%).
- Eight (8) requests were still active as of the last day of the reporting period, all of which were received during the reporting period.
 - Two (2) requests were abandoned after the end of the reporting period.
 - The other six (6) requests were subject to extension:
 - One (1) was extended for 305 days, over and above of the first 30 days.
 - One (1) was extended for 120 days, over and above the first 30 days.
 - Four (4) was extended for 30 days, over and above the first 30 days, and are now closed.
 - Of the six (6) extensions, all were attributable to the large scope of the requests and/or the searches required to respond thereto. In two (2) instances, extensions were also required to provide notices to third parties.

During the reporting period, the Institution did not receive any complaint(s) from the Information Commissioner of Canada, for the different categories of complaint:

- No (0) administrative complaints;
- No (0) refusal complaints; and
- No (0) complaints settled during the period.

During the reporting period, the Institution received two (2) consultations from other government institutions. Both consultations were responded to within the reporting period and within the prescribed deadlines.

5. TRAINING AND AWARENESS-RAISING

During the reporting period, the Institution held an awareness session to inform employees of the importance of ATI.

After the end of the reporting period, the Institution expanded its Access to Information and Privacy Office. With the help of these additional resources, the Institution is currently developing a more comprehensive training program.

6. POLICIES, GUIDELINES AND PROCEDURES

The Institution's Access to Information Policy was developed during the reporting period and approved by its Board of Directors, effective May 28, 2024. The Policy is aligned with the Treasury Board of Canada Secretariat's policy on access to information. It reiterates the main obligations under the ATIA and sets out guidelines on how to respond to requests for information under the ATIA, on disclosure obligations, and on the development of training and awareness programs for employees.

During the reporting period, the Institution:

- Set up an electronic tracking system to improve the management of requests and deadlines; and
- Revised standardized forms for proactive publication under Part 2 of the ATIA to improve process efficiency.

7. INITIATIVES AND PROJECTS TO IMPROVE ACCESS TO INFORMATION

During the reporting period, the Institution did not implement significant initiatives or projects to improve access to information.

The Institution is setting up a legal watch to ensure that representatives of the Institution directly involved in compliance keep abreast of the latest and best practices in managing requests for access to information.

8. SUMMARY OF KEY ISSUES AND ACTIONS TAKEN ON COMPLAINTS

No complaints were received or concluded during the reporting period and there were no pending complaints as of the end of such period.

9. PROACTIVE PUBLICATION UNDER PART 2 OF THE ATIA

The proactive publication requirements under Part 2 of the ATIA applicable to the Institution are indicated in the following table. The Institution publishes such information on the "Transparency and Trust" page of its public website at <https://altotrain.ca/en/transparency-and-trust/>.

During the reporting period, the Institution published on its website, within the time limits prescribed by law, all of its proactive publication requirements due in respect of individuals who were then designated as "senior officers or employees" within the meaning of the ATIA.

The Institution's Vice-President, Finance, is responsible for ensuring that proactive publication requirements are complied with, under the general oversight of the Institution's Chief Financial and Technology Officer.

LEGISLATIVE REQUIREMENT	SECTION OF THE ATIA	PUBLICATION TIMELINE	INSTITUTIONAL REQUIREMENTS	COMPLIANCE RATE FOR PROACTIVE PUBLICATIONS
ALL GOVERNMENT INSTITUTIONS AS DEFINED IN SECTION 3 OF THE ATIA				
Travel Expenses	82	Within 30 days after the end of the month of reimbursement	Y	100%
Hospitality Expenses	83	Within 30 days after the end of the month of reimbursement	Y	100%
Reports tabled in Parliament	84	Within 30 days after tabling	Y	100%
GOVERNMENT ENTITIES OR DEPARTMENTS, AGENCIES, AND OTHER BODIES SUBJECT TO THE ATIA AND LISTED IN SCHEDULES I, I.1, OR II OF THE <i>FINANCIAL ADMINISTRATION ACT</i>				
Contracts over \$10,000	86	T1-3: Within 30 days after the quarter T4: Within 60 days after the quarter	N	
Grants and contributions over \$25,000	87	Within 30 days after the quarter	N	
Packages of briefing materials prepared for new or incoming deputy heads or equivalent	88(a)	Within 120 days after appointment	N	
Titles and reference numbers of memoranda prepared for a deputy head or equivalent, that are received by their office	88(b)	Within 30 days after the end of the month received	N	
Packages of briefing materials prepared for a deputy head or equivalent's appearance before a committee of Parliament	88(c)	Within 120 days after appearance	N	
GOVERNMENT INSTITUTIONS THAT ARE DEPARTMENTS NAMED IN SCHEDULE I TO THE <i>FINANCIAL ADMINISTRATION ACT</i> OR PORTIONS OF THE CORE PUBLIC ADMINISTRATION NAMED IN SCHEDULE IV TO THAT ACT (I.E. GOVERNMENT INSTITUTIONS FOR WHICH TREASURY BOARD IS THE EMPLOYER)				
Reclassification of positions	85	Within 30 days after the quarter	N	

LEGISLATIVE REQUIREMENT	SECTION OF THE ATIA	PUBLICATION TIMELINE	INSTITUTIONAL REQUIREMENTS	COMPLIANCE RATE FOR PROACTIVE PUBLICATIONS
MINISTERS				
Packages of briefing materials prepared by a government institution for new or incoming ministers	74(a)	Within 120 days after appointment	N	
Titles and reference numbers of memoranda prepared by a government institution for the minister, that are received by their office	74(b)	Within 30 days after the end of the month received	N	
Package of question period notes prepared by a government institution for the minister and in use on the last sitting day of the House of Commons in June and December	74(c)	Within 30 days after the last sitting day of the House of Commons in June and December	N	
Packages of briefing materials prepared by a government institution for a minister's appearance before a committee of Parliament	74(d)	Within 120 days after appearance	N	
Travel Expenses	75	Within 30 days after the end of the month of reimbursement	N	
Hospitality Expenses	76	Within 30 days after the end of the month of reimbursement	N	
Contracts over \$10,000	77	T1-3: Within 30 days after the quarter T4: Within 60 days after the quarter	N	
Ministers' Offices Expenses *This consolidated report is currently published by the Treasury Board Secretary on behalf of all institutions.	78	Within 120 days after the fiscal year	N	

10. MONITORING COMPLIANCE

From time to time during the reporting period, the Institution conducted reviews of its obligations under the ATIA and the Privacy Act to ensure (i) that information disclosed in response to an access to information request or consultation is accurate, complete, and compliant, and (ii) that responses provided to access requests or consultations also protect the confidentiality of individuals' personal information.

In addition, the internal control framework for financial reporting is used to provide reasonable assurance that the Institution complies with proactive publication requirements under Part 2 of the ATIA.

Other than the above, no documented monitoring exercises were carried out during the reporting period given the absence of complaints and the low number of requests and consultations received.

**SCHEDULE A
DELEGATION ORDER**

(appended)

DELEGATION ORDER

ACCESS TO INFORMATION ACT PRIVACY ACT

I, the undersigned, Chief Executive Officer of VIA HFR – VIA TGF INC., pursuant to section 95 of the *Access to Information Act* and section 73 of the *Privacy Act*, hereby delegate to the persons holding the positions set out in the appendix, or the persons occupying those positions on an acting basis, the authority to exercise the powers, duties and functions vested in the Chief Executive Officer as the head of VIA HFR – VIA TGF INC. under the provisions of the *Access to Information Act* and *Privacy Act* and their related regulations.

This delegation order replaces and repeals all previous delegation orders.

Signed in the City of Montreal,
this 15th day of October, 2024

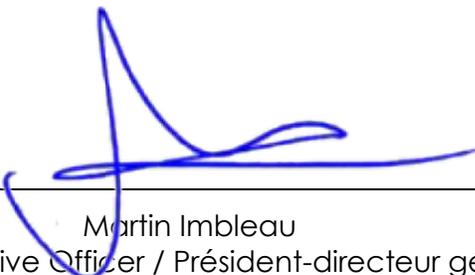
ARRÊTÉ DE DÉLÉGATION

LOI SUR L'ACCÈS À L'INFORMATION LOI SUR LA PROTECTION DES RENSEIGNEMENTS PERSONNELS

Je, soussigné, président-directeur général de VIA HFR – VIA TGF INC., conformément à l'article 95 de la *Loi sur l'accès à l'information* et à l'article 73 de la *Loi sur la protection des renseignements personnels*, délègue par les présentes aux titulaires des postes indiqués en annexe, ou aux personnes occupant ces postes par intérim, les attributions, les fonctions et les pouvoirs dont le président-directeur général est investi en tant que responsable de VIA HFR – VIA TGF INC. aux termes de la *Loi sur l'accès à l'information*, de la *Loi sur la protection des renseignements personnels* et des règlements afférents.

Le présent document remplace et annule tout arrêté de délégation antérieur.

Signé dans la ville de Montréal,
le 15^e jour d'octobre 2024



Martin Imbleau
Chief Executive Officer / Président-directeur général

APPENDIX / ANNEXE

Delegation of powers, duties and functions under section 95 of the Access to Information Act and section 73 of the Privacy Act

Délégation d'attributions, fonctions et pouvoirs en vertu de l'article 95 de la Loi sur l'accès à l'information et de l'article 73 de la Loi sur la protection des renseignements personnels

Position / Poste	Access to Information Act and Regulations / Loi sur l'accès à l'information et réglementation afférente	Privacy Act and Regulations / Loi sur la protection des renseignements personnels et réglementation afférente
Chief Legal Officer / Chef de la direction des affaires juridiques	Full authority / Pleine autorité	Full authority / Pleine autorité
Corporate Secretary and Access to Information and Privacy Coordinator / Secrétaire corporatif et Coordinatrice de l'accès à l'information et de la protection des renseignements personnels	Full authority / Pleine autorité	Full authority / Pleine autorité