



November 8, 2011

Ted Gerk
621 Grandview Road
Kelowna BC V1V 2C8

Dear Ted Gerk:

**Request for Information – Office of the Information and Privacy Commissioner
File F11-47206**

Thank you for your letter of October 31, 2011 expressing your concerns regarding s. 22.1 of the *Freedom of Information and Protection of Privacy Act* (FIPPA).

I agree with my predecessors that a mandatory exception based solely on the subject-matter of the record is a feature of outmoded access laws. The current international standard for exceptions to disclosure is that all exceptions should be harms based. I further agree that s. 22 of FIPPA is capable of protecting such information as would identify abortion service providers or patients or threaten their health or safety.

Sincerely,

Elizabeth Denham
Information and Privacy Commissioner
for British Columbia