CSA STAFF NOTICE 52-326
IFRS TRANSITION DISCLOSURE REVIEW

CSA/ACVM Canadian Securities Administrators Autorités canadiennes en valeurs mobilières

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Introduction

Canadian Securities Administrators (CSA) staff conducted a review to assess the extent and quality of International Financial Reporting Standards (IFRS) transition disclosure made by issuers in 2009 annual Management's Discussion & Analysis (MD&A). We compared the IFRS transition disclosure of 196 calendar year-end issuers to the disclosure guidance provided in CSA Staff Notice 52-320 *Disclosure of Expected Changes in Accounting Policies Relating to Changeover to International Financial Reporting Standards* (SN 52-320). SN 52-320 provides guidance on the requirement in Form 51-102F1 *Management's Discussion & Analysis* (Form 51-102F1) for an issuer's disclosure of expected changes in accounting policies related to IFRS changeover for the three year period prior to financial years beginning on or after January 1, 2011 (the changeover date).

We expected issuers to have provided in their 2009 annual MD&A a progress update on their IFRS changeover plans. In addition, issuers should have described the major identified differences between their current accounting policies and those they will be required to apply, or expect to apply, in preparing their IFRS financial statements.

Based on these expectations, our review focused on the disclosure of an issuer's IFRS changeover plan and the related discussion of the accounting policy effects of IFRS on the issuer's financial reporting. Overall, we found improvement in the amount and quality of IFRS transition disclosure provided by issuers. Issuers recognized the importance of this disclosure to their stakeholders and demonstrated a willingness to provide disclosure consistent with the guidance in SN 52-320. However, we identified areas where disclosure could be improved and consequently we asked, when appropriate, that these issuers confirm future MD&A filings would contain enhanced IFRS transition disclosure.

This notice summarizes the results of our review and provides additional guidance for issuers preparing their MD&A. We did not assess an issuer's preparedness for IFRS transition. That assessment is best done by an issuer's management, board of directors and external advisors. Issuers and their directors and advisors, should take this notice into account when assessing the extent to which future MD&A disclosure meets the requirements of securities legislation and their investors' need for meaningful IFRS disclosure.

It is critical that issuers communicate the potential impact of the IFRS changeover. Investors need to be properly informed during the IFRS transition on whether reported changes in financial performance relate to the adoption of different accounting standards or relate to a change in the issuer's business. Changes in accounting policies necessitated by transition to IFRS may result in greater volatility in reported results depending upon the issuer's industry and its entity-specific circumstances.

As discussed in SN 52-320, issuers should provide detailed information about the impacts of adopting IFRS in their 2010 interim and annual filings. Staff will continue to review IFRS transition disclosure provided by issuers as part of our continuous disclosure review program.

Investor Impact

The changeover from Canadian GAAP to IFRS could have a material impact on an issuer's business functions and reported financial results. Disclosure is important to assist investors in assessing an issuer's readiness to transition to IFRS and the related impact that the adoption of IFRS may have on the entity.

The disclosure expectations outlined in SN 52-320 for 2009 annual MD&A directs issuers to provide investors with the following information:

- A status update on their IFRS changeover plan, including a detailed discussion of each of the key elements of the plan;
- A discussion of the significant differences between the issuer's current accounting policies and those the issuer is required or expects to apply in preparing IFRS financial statements;
- A description of the impact that the above noted differences may have on the issuer's reported financial statements and results; and
- Whether the transition to IFRS has, or will, result in a change to the issuer's business functions and activities.

Issuers that provide sufficient information about their conversion process and its effects prior to the changeover date will reduce the level of investor uncertainty about IFRS readiness and inform readers about the potential for volatility in future reported results. This disclosure should lead to a more stable and less disruptive transition to IFRS, which will be beneficial to both issuers and their investors.

Summary of Findings

Overall, we found an improvement in the amount and quality of IFRS transition disclosure provided by issuers in their 2009 annual MD&A compared to the prior year. Such improvement should be expected since we are closer to the changeover date and issuers generally are farther along in implementing their changeover plans and assessing the impact of accounting policy differences. A summary of our findings follows:

- 95% of issuers reviewed disclosed their IFRS changeover plan, which is a significant improvement over the prior year. We did, however, note some areas where investors would benefit from more information. In particular, issuers should have provided an in-depth discussion of all key elements which were assessed as part of their changeover plan.
- 60% of issuers described milestones and anticipated timelines associated with each of the key elements of their IFRS changeover plan. All issuers should continue to focus on enhancing disclosure in this area so that investors can readily assess whether the project is progressing in accordance with the IFRS changeover plan.
- 82% of issuers identified significant accounting policy differences between Canadian GAAP and IFRS. However, issuers could improve their discussion of accounting differences to enhance investors'

understanding of the impact of adopting IFRS on the issuer. Specifically, disclosure should have linked accounting differences to various financial statement categories in the balance sheet or the income statement. Such disclosure would have provided a basis for discussing the quantified effects of IFRS conversion in future MD&A filings.

- 80% of issuers provided an update of IFRS transition information from disclosure made in 2008 annual MD&A and 2009 interim MD&A. This improvement over the prior year suggests that investors are generally being provided with information that is timely, reflecting an issuer's IFRS transition efforts.

Findings

This section discusses the results of our review in detail.

IFRS Changeover Plan

No Disclosure of a Changeover Plan

SN 52-320 states that if an issuer has developed an IFRS changeover plan, this plan should be disclosed in its MD&A. The vast majority of issuers reviewed, 95%, disclosed a changeover plan. This is a significant improvement over the prior year. For those issuers that did not provide IFRS disclosure, a reader was unable to assess whether the issuer is taking the appropriate steps to manage its transition to IFRS. If an issuer does not have a changeover plan, we generally believe this to be material information that should have been disclosed in its MD&A.

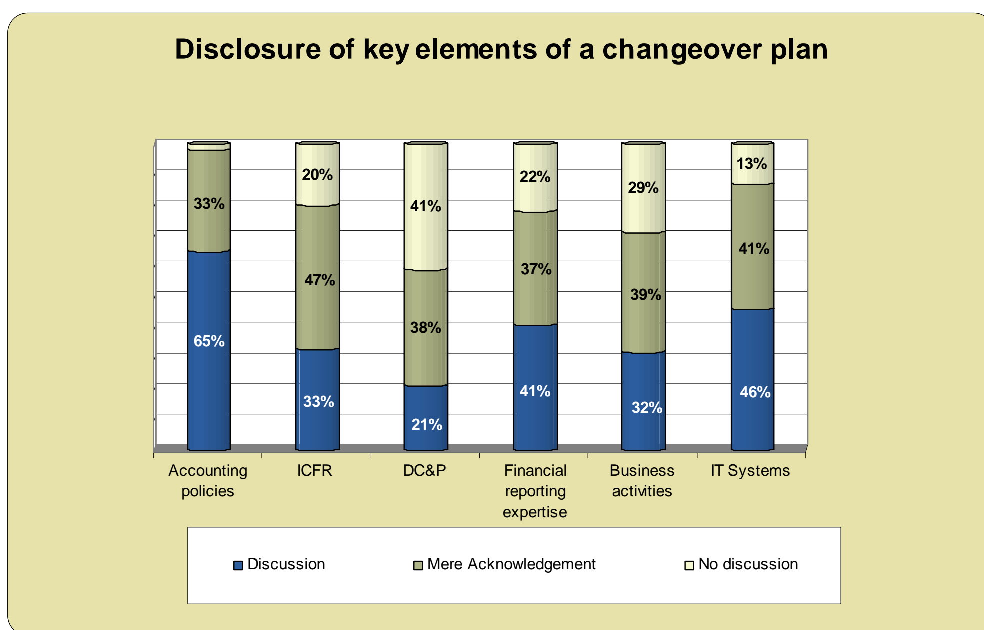
Given the short time remaining before the changeover date, we are concerned that issuers without a plan may be at greater risk of not meeting their future filing obligations. We asked issuers without a changeover plan to provide us with their assessment of how they intend to meet future reporting obligations in the absence of a comprehensive plan. Management and audit committees need to carefully consider this issue and the impact on their investors if they have not planned for IFRS transition.

If issuers continue filing financial statements using Canadian GAAP after the changeover date, the issuer's principal regulator may issue a cease trade order that will prohibit trading in securities of the issuer in accordance with the guidance in National Policy 12-203 *Cease Trade Orders for Continuous Disclosure Defaults.* Furthermore, if an issuer determines that it will not be able to prepare IFRS financial statements by the required deadlines after the changeover date, this will often be a material change that the issuer should immediately communicate to the securities marketplace by way of a news release and material change report in accordance with Part 7 of NI 51-102 *Continuous Disclosure Obligations.*

Disclosure of a Changeover Plan

As outlined in SN 52-320, discussion in the 2009 annual MD&A should have provided an update to an issuer's previously disclosed IFRS changeover plan. This includes an update on the key elements specific to the issuer's changeover plan that address the impact of IFRS and may include accounting policies, internal control over financial reporting (ICFR), disclosure controls and procedures (DC&P), financial reporting expertise, business activities, information technology systems (IT) or other elements. For the 95% of issuers that included IFRS

transition disclosure in their 2009 MD&A, the chart below shows the extent to which each of the potential key elements outlined in SN 52-320 were specifically addressed.



Generally, we noted improvement in the extent to which issuers discussed each of these key elements in their 2009 annual MD&A over the prior year. Many issuers provided entity-specific and comprehensive information that would be useful to investors. We did, however, note some areas where investors would benefit from more information. Specifically, we found that many issuers provided an in-depth discussion of certain key elements of their changeover plan, most commonly accounting policies and IT systems, while other key elements that were considered as part of their plan were not discussed.

In response to our comment letters, some issuers explained that they had assessed a specific element as part of their IFRS changeover plan and had determined there was no impact as a result of the changeover to IFRS. Rather than disclose the results of this assessment, issuers only discussed the elements that would likely be impacted by IFRS. A comprehensive discussion of the assessment, and related conclusion, for all key elements included in their changeover plan would have enhanced a reader's understanding of the IFRS impacts on the issuer and reduced the potential for investor uncertainty. As a result, we asked these issuers to discuss the complete results of this assessment in their next MD&A filing.

For each key element of an IFRS changeover plan discussed in MD&A, issuers should have described the significant milestones and anticipated timelines. This provides a reader with the information necessary to assess an issuer's readiness to meet the changeover to IFRS.

Our review found 60% of issuers described the significant milestones and anticipated timelines associated with each of the plan's key elements. While this represents an improvement over the prior year, issuers still need to focus on enhancing their disclosure in this area. We also noted that some issuers did not discuss conclusions

reached as these milestones were completed. It is important that issuers discuss the outcomes and implications associated with the completion of key milestones so that investors can readily assess whether the project is progressing in accordance with the changeover plan.

Identified Differences between Canadian GAAP and IFRS

As outlined in SN 52-320, issuers should have described the major identified differences between the issuer's current accounting policies and those the issuer is required to apply, or expects to apply, in preparing IFRS financial statements. Such differences should have included any difference due to an expected change in accounting policy even though the issuer's existing policy under Canadian GAAP is permissible under IFRS. The discussion should have been comprehensive enough for an investor to understand the impact of these policy changes on the issuer's financial statements.

Of the issuers reviewed, 82% identified differences between the accounting policies currently applied under Canadian GAAP and those policies required, or expected, to be applied under IFRS. However, we noted improvements could be made. For example, rather than simply listing the accounting standards to be adopted upon transition, and providing a limited description of accounting policy differences between Canadian GAAP and IFRS, an issuer should have explained the full implications of these differences on the issuer's expected reporting under IFRS. The discussion should have focused on only the policy differences that would likely be material to the issuer. While we expected this information to likely only be narrative for 2009, enhanced entity-specific disclosure would have provided an investor with information about the potential impact of identified IFRS accounting policy differences on an issuer's future balance sheet, income statement and key performance metrics.

Our review identified two types of accounting differences - differences that are common across various industries and differences that are industry-specific. We discuss each of these differences in more detail below and provide examples of entity-specific disclosures that may assist issuers in preparing their MD&A. These examples form only one part of a complete IFRS transition discussion and are for illustrative purposes only. Accordingly, they may not be sufficient or appropriate for any particular issuer depending on its circumstances and the needs of its investors. Responsibility for making sufficient and appropriate disclosure and complying with applicable securities legislation remains with issuers.

Common accounting policy differences

We reviewed issuers from various industries, including biotechnology, financial services, insurance, manufacturing, mining, real estate, oil and gas, retail, services and technology and found many accounting policy differences that were common to each of these industries. For differences that are common across industries and entities, it is imperative the issuer discuss the potential entity-specific impact of these differences on its financial reporting to increase an investor's understanding of the full implications of the IFRS transition. Some of the common accounting differences disclosed by issuers included impairment of assets, revenue recognition and property, plant and equipment. An example of entity-specific disclosure for each of these accounting differences is provided below.

Impairment of assets

Under IFRS, the methods for recognizing and measuring impairment losses vary from existing Canadian GAAP. Issuers commonly identified that IFRS only requires a one-step impairment process, which may increase the amount of recognized impairment losses. In addition, unlike existing Canadian GAAP, IFRS generally permits the reversal of impairment losses if there is a change in the estimate used to determine the asset's recoverable amount.

We found an issuer's disclosure was limited to identifying these IFRS differences. More meaningful information to investors would have identified and explained that such differences in the measurement and recognition of impairment losses and reversals could lead to increased income statement volatility under IFRS. We have provided below an entity-specific example of accounting policy disclosure related to the method of calculating impairment losses under IFRS.

Entity-Specific Impairment of Assets Disclosure:

Canadian GAAP generally uses a two-step approach to impairment testing: first comparing asset carrying values with undiscounted future cash flows to determine whether impairment exists, and then measuring impairment by comparing asset carrying values to their fair value (which is calculated using discounted cash flows). IAS 36 *Impairment of Assets* (IAS 36) uses a one-step approach for testing and measuring impairment, with asset carrying values compared directly with the higher of fair value less costs to sell and value in use (which uses discounted cash flows). This may potentially result in write-downs where the carrying value of assets were previously supported under Canadian GAAP on an undiscounted cash flow basis, but could not be supported on a discounted cash flow basis. This difference could lead to income statement and earnings volatility in future periods. The Company assessed the carrying value of its assets in accordance with IAS 36 and found that no impairment losses were required to be recognized as at the date of transition, January 1, 2010.

Revenue recognition

Revenue is often the single largest item reported in an issuer's financial statements. In addition to the direct impact that it has on an issuer's bottom line, investors also place great importance on revenue when making investment decisions. Our review found issuers were generally silent on revenue recognition accounting differences. We would have expected issuers to focus on the IFRS accounting standards governing revenue recognition, including the absence of detailed standards in IFRS compared to Canadian GAAP.

Disclosure addressing the potential timing differences in revenue recognition would have provided important information to readers of the issuer's financial statements. Absent this disclosure, an investor may have difficulty interpreting a change in accounting policy versus a change in an issuer's revenue generating activities during the

year of IFRS adoption. We have provided below an example of disclosure related to revenue recognition accounting policy differences specific to an entity.

Entity-Specific Revenue Recognition Disclosure:

In reviewing IAS 18 *Revenue*, we have determined that certain changes will be made in the manner in which we recognize revenue in arrangements that have multiple deliverables. In accordance with Canadian GAAP, we recognize revenue for all delivered elements in an arrangement when there is objective and reliable evidence of fair value for the undelivered elements (commonly referred to as the residual method). Under the residual method, the amount of consideration allocated to the delivered elements equals the total arrangement consideration less the fair value of the undelivered item. However, in accordance with IFRS, revenue is allocated and recognized for each separately identifiable component in a multiple deliverable arrangement. The residual method is not permitted. As a result, for certain arrangements, the amount and timing of revenue recorded for each identifiable components may differ under IFRS.

Property, plant and equipment (PP&E)

IAS 16 *Property, plant and equipment* requires separate accounting for the different components of an asset when the associated depreciation methods or rates are different. While existing Canadian GAAP also refers to componentization of PP&E, the requirements in IFRS on this issue are more explicit. IFRS also permits PP&E to be revalued to fair value at the end of each reporting period.

We found issuers generally discussed both of these differences. However, to have provided meaningful information to investors, issuers should have disclosed the effects of asset componentization on the balance sheet and depreciation expense in net income. For those issuers identifying the revaluation option as a possible alternative, disclosure would have provided the impact of the revaluation surplus amount on equity. An example of entity-specific disclosure on the effects of componentization of PP&E is provided below.

Entity-Specific Property, Plant and Equipment Disclosure:

The Company expects the carrying value of certain property, plant and equipment may decrease upon conversion to IFRS compared to the carrying value under Canadian GAAP. The decrease may result from increased depreciation expense due to asset componentization and the requirement to depreciate property, plant and equipment when the assets are available for use, rather than when the assets are put into use. Asset componentization, which may result in increased depreciation expense, involves breaking down an asset by identifying significant individual components and separately depreciating those individual components over their useful lives.

Industry specific accounting policy differences

While performing our review we also noted various industry issues. We have highlighted below some of the industry-specific issues identified in our review.

Mining

The most common accounting standard identified by issuers in the mining sector was IFRS 6 *Exploration for and Evaluation of Mineral Resources* (IFRS 6). IFRS 6 allows issuers to follow an approach similar to Canadian GAAP, and therefore, exploration and evaluation (E&E) expenditures can be either expensed or capitalized. Our review found that half of the mining issuers reviewed discussed this standard in enough detail for an investor to understand the policy choices available to the issuer under IFRS.

While we found many issuers plan to continue to apply their current accounting policy for E&E expenditure post-IFRS transition, not all issuers discussed the accounting policy they expect to adopt for these costs. Given that IFRS permits the alternative of expensing or capitalizing E&E expenditures, issuers should have had discussed their accounting policy choice, including any possible changes that this choice would likely have on its balance sheet and income statement. Alternatively, an issuer should have disclosed that it is still considering its accounting policy decision. Below is an example of entity-specific disclosure related to IFRS 6 accounting differences.

Entity-Specific Mining Disclosure:

IFRS 6, *Exploration for and Evaluation of Mineral Resources* (IFRS 6), applies to expenditures incurred on properties in the exploration and evaluation (E&E) phase. The E&E phase begins when an entity obtains the legal rights to explore a specific area and ends when the technical feasibility and commercial viability of extracting a mineral resource are demonstrable. IFRS 6 requires entities to select and consistently apply an accounting policy specifying which E&E expenditures are capitalized and which are expensed. Our project team is developing a policy that includes defining the E&E phase and accounting for E&E expenditures.

The Company expects to establish an accounting policy to expense, as incurred, all costs relating to E&E until such time as it is determined that a property has economically recoverable reserves. On adoption of IFRS, the carrying value of the unproven properties will be reduced to zero (at the transition date), with a corresponding adjustment to accumulated deficit. All subsequent E&E expenditure will be expensed as incurred until such time as it has been determined that a property has economically recoverable reserves.

Oil & Gas

Most oil and gas issuers currently apply full cost accounting under Canadian GAAP. Full cost accounting allows an issuer to capitalize costs incurred to locate, acquire and develop reserves for multiple projects in a cost

centre which may be a large geographical area. IFRS 6 limits this type of accounting to exploration and evaluation activities only. Costs incurred for all other activities must be accounted for on a successful efforts or comparable basis. Many issuers currently applying full cost accounting disclosed that they will have to revise their accounting policy for the recognition of these costs and assess the appropriateness of their current depletion policies. Issuers should also have described the potential impact on the key balance sheet and income statement areas that are expected to be affected as a result.

Some issuers also discussed the IFRS 1 *First-time Adoption of International Financial Reporting Standards* (IFRS 1) exemptions that were applicable. An entity that currently uses full cost accounting can elect to measure E&E assets at the amount determined under Canadian GAAP and to measure oil and natural gas assets in the development or production phases by allocating the amount determined under the Canadian GAAP to the underlying assets pro rata using reserve volumes or reserve values as of the date of adoption. This is a significant exemption that many oil and gas issuers expect to adopt, therefore, disclosure of this fact was expected. An example of an oil and gas issuer's PP&E disclosure is provided below.

Entity-Specific Oil and Gas Disclosure for PP&E:

Under Canadian GAAP, the Company follows the CICA's guidance on full cost accounting, while IFRS has no equivalent guideline. Under GAAP, the Company accounts for its petroleum and natural gas properties whereby all costs directly associated with the exploration and development of natural gas reserves are capitalized. Upon transition to IFRS, the Company will be required to adopt new accounting policies to account for certain of these expenditures.

According to IFRS 6, *Exploration for and Evaluation of Mineral Resources* (IFRS 6), pre-exploration costs must be expensed in the period incurred. Currently, the Company capitalizes and depletes pre-exploration costs; however, these costs have been insignificant for the Company in the past, therefore, this difference is not expected to be material.

IFRS 6 defines exploration and evaluation (E&E) expenditures under IFRS and states that, upon transition, the Company will need to reclassify all E&E expenditures that are currently included in PP&E on the balance sheet as E&E assets. Under IFRS, the Company will have the option to initially capitalize these costs as E&E assets on the balance sheet or expense them in the period incurred. The Company has not concluded at this time the preferred accounting policy for E&E assets.

Under IFRS, the Company will continue to capitalize development and production costs in PP&E on the balance sheet. However, the depletion basis for these costs will likely change from a country cost centre to a smaller unit of measure. The Company has not finalized the inputs to be utilized in the unit-of-production depletion calculation. Under GAAP, the Company calculates depletion expense using the unit-of-production method based on estimated proved natural gas reserves. The Company can comply with IFRS by using a reserve base of either proved reserves or proved plus probable reserves. The Company has concluded at this time that it will continue to use proved reserves as the basis, therefore this difference is not anticipated to be material.

Real estate

The real estate industry faces potential significant changes in financial reporting with the adoption of IFRS. IAS 40 *Investment Property* (IAS 40) gives issuers the option to record investment property at fair value on the balance sheet with the gains and losses recorded through income in each reporting period. Alternatively, an issuer can elect to continue measuring investment property using the historical cost model as currently required under Canadian GAAP; however, IFRS requires the fair value of the investment property to be disclosed in the financial statement notes.

We noted many issuers expect to use the fair value method to account for their investment properties. Given this is a significant difference from existing Canadian GAAP and will likely lead to greater volatility in reported results, issuers should have described the potential impact to the balance sheet and income statement resulting from this accounting policy choice. An example of entity-specific IAS 40 disclosure is provided below.

Entity-Specific Real Estate Disclosure:

IFRS defines investment property as property held by the owner to earn rental income, capital appreciation or both. Assets classified as income producing properties on the balance sheet of the Company qualify as investment property under IFRS.

Under IFRS, the Company has a choice of measuring investment property using the historical cost model or the fair value model. The cost model is generally consistent with Canadian GAAP and would require that the fair value be disclosed in the notes to the financial statements. Under the fair value model, investment property is measured at fair value, and changes in fair value are recorded through income each reporting period. Under the fair value model there are no charges for depreciation like under the cost model.

The Company expects to use the fair value model when preparing its IFRS financial statements. The Company has substantially completed the design of the investment property valuation process and has commenced implementation. The magnitude of the impact to the Company's balance sheet cannot be quantified at this time but is expected to be significant.

Quarterly Updates

SN 52-320 sets out an incremental approach to disclosure of the impact of IFRS changeover leading up to 2011. Issuers should provide more detailed disclosure in each successive reporting period as the changeover date approaches. Alternatively, disclosure should confirm that no progress has been made during the quarter.

Our review found that 80% of issuers provided an update on the status of their IFRS changeover plan when comparing disclosure in 2009 annual MD&A to 2009 Q3 interim MD&A. This represents an improvement over the quarterly progress updates provided by issuers in 2008. We expect updates in each reporting period in 2010.

Future Action

We expect incremental disclosure will become more robust and complete as transition approaches. It is critical for investors that issuers provide timely transition disclosure. Issuers with calendar year-ends only have the remaining reporting periods in 2010 to communicate the potential impact of IFRS transition. Since IFRS will be implemented in the first quarter of 2011 for calendar year-end issuers, we expect issuers to provide, through interim and annual 2010 MD&A disclosure, more detailed disclosure of their changeover plan and information about key decisions on policy choices under IFRS 1 and other standards to the extent these choices were not disclosed in 2009 MD&A.

As required by Form 51-102F1, disclosure of expected changes in accounting policies should include a discussion of the expected effect on the issuer's financial statements or a statement that the issuer cannot reasonably estimate the effect. During late 2009 and the first half of 2010, many companies started preparing quantitative information for the opening IFRS statement of financial position. As the process for preparing this information continues, more quantitative information will become available during 2010, and we believe it is important for investors to start to understand the quantitative impacts that they will begin to see in 2011. Given this, issuers should consider when they can communicate quantified information in their 2010 interim and annual MD&A prior to final approval of IFRS balances. For example, in communicating the expected effects of IFRS changeover on significant financial statement items, issuers may want to consider indicating, directionally, how significant asset and liability balances may change as a result of accounting policy decisions, or providing estimates of balances relating to the transition date balance sheet.

We will continue to review IFRS transition disclosure as part of our overall continuous disclosure review program. Issuers should anticipate staff requests for re-filings of MD&A in the future if an issuer has not met its disclosure obligations.

Questions

Allan Lim
Manager, Corporate Disclosure
British Columbia Securities Commission
Phone: 604-899-6780, Email: alim@bscs.bc.ca

Monika Jedrusiak
Securities Analyst
Alberta Securities Commission
Phone: 403-297-4879, Email: monika.jedrusiak@asc.ca

Ian McIntosh
Deputy Director, Corporate Finance
Saskatchewan Financial Services Commission
Phone: 306- 787-5867, Email: Ian.mcintosh@gov.sk.ca

Patrick Weeks
Corporate Finance Analyst
Manitoba Securities Commission
Phone: 204-945-3326, Email: patrick.weeks@gov.mb.ca

Kelly Gorman
Deputy Director, Corporate Finance
Ontario Securities Commission
Phone: 416-593-8251, Email: kgorman@osc.gov.on.ca

Heidi Franken
Senior Accountant, Corporate Finance
Ontario Securities Commission
Phone: 416-593-8249, Email: hfranken@osc.gov.on.ca

Kelly Mireault
Accountant, Corporate Finance
Ontario Securities Commission
Phone: 416-595-8774, Email: kmireault@osc.gov.on.ca

Nicole Parent
Analyste, Service de l'information continue
Autorité des marchés financiers
Phone: 514-395-0337 ext. 4455, Email: nicole.parent@lautorite.qc.ca

Jeff Harriman,
Securities Analyst
New Brunswick Securities Commission
Phone: 506-643-7856, Email: Jeff.Harriman@gnb.ca

Kevin G. Redden
Director, Corporate Finance
Nova Scotia Securities Commission
Phone: 902-424-5343, Email: reddenkg@gov.ns.ca