

October 07, 2025

Dear Applicant:

Re: Your request for access to information under Part II of the Access to Information and Protection of Privacy Act [Our File #: HCS/155/2025]

On September 11, 2025, the Department of Health and Community Services (HCS) received your request for access to the following records:

- **Any reports or datasets on the number of gender-affirming "top surgeries" (mastectomies) and gender-affirming "bottom surgeries" (e.g. orchiectomy, scrotoplasty, vaginoplasty, phalloplasty, metoidioplasty, oophorectomy, hysterectomy, and penectomy) performed by year between 2000-2025 on those at or above the age of majority (adults) and/or those under the age of majority (minors).**
- **Any reports or datasets on the number of unique patients at or above the age of majority (adults) and/or those under the age of majority (minors) prescribed gender-affirming "hormone therapy" (puberty blockers or cross-sex hormones) by year between 2000-2025.**
- **Any reports or datasets on the number of total visits and/or unique patients at or above the age of majority (adults) and/or those under the age of majority (minors) to specialized at gender clinics by year between 2000-2025.**

On that same day, after discussions with the ATI Coordinator, you agreed to narrow your request to:

- **Any reports or datasets on the number of unique patients at or above the age of majority (adults) and/or those under the age of majority (minors) prescribed gender-affirming "hormone therapy" (puberty blockers or cross-sex hormones) by year between 2000-2025.**

On September 12, 2025, the ATI Coordinator informed you that the HCS is unable to determine whether these prescriptions were for gender-affirming care purposes and that it would not have responsive records prior to 2005. Also on the 12th, you agreed to receive data from the entire Newfoundland and Labrador Prescription Drug Program (NLPDP) client group for the available period, that is, from 2005 to 2025 (year to date September 11, 2025).

A decision has been made by the Department of Health and Community Services to provide access to requested information. In accordance with your request for a copy of the records, the information has been outlined in the table below.

Fiscal Year	Unique Clients
2005-2006	3,378
2006-2007	4,686
2007-2008	5,426
2008-2009	5,517
2009-2010	5,410
2010-2011	5,769
2011-2012	6,022
2012-2013	6,338
2013-2014	6,509
2014-2015	6,591
2015-2016	6,806
2016-2017	7,067
2017-2018	7,269
2018-2019	7,490
2019-2020	7,770
2020-2021	7,687
2021-2022	7,771
2022-2023	8,267
2023-2024	8,830
2024-2025	9,445
2025-2026*	8,024

*data to September 19, 2025

Please note that the number of “Unique Clients” corresponds to the total client group of the Newfoundland and Labrador Prescription Drug Program (NLPDP), as HCS does not have this data broken down by age or age group.

Additionally, please be aware that the following drug classes were used to compile the above data. It is important to note that the NLPDP does not capture patient diagnosis and that these drug classes may be used not only in gender-affirming treatment but also (not limited to) menopause, blood pressure, fertility, prostate cancer, endometriosis, polycystic ovary syndrome.

- G03BA03 - Testosterone
- G03CA03 - Estradiol
- G03CA57 - Conjugated Estrogens
- L02AE02 - Leuprorelin
- C03DA01 - Spironolactone (anti-androgen)

- L02AE02 - Luprolide (GnRHa)
- G03DA04 - Progesterone
- G03DA02 - Medroxyprogesterone Acetate
- G03AC06 - Medroxyprogesterone Acetate (depo) (less-likely to be used but not impossible)
- G03HA01 - Cyproterone

Please be advised that you may ask the Information and Privacy Commissioner to review the processing of your access request, as set out in section 42 of **Access to Information and Protection of Privacy Act, 2015** (the “Act”) (a copy of this section has been enclosed for your reference). A request to the Commissioner must be made in writing within 15 business days of the date of this letter or within a longer period that may be allowed by the Commissioner.

The appeal may be addressed to the Information and Privacy Commissioner is as follows:

Office of the Information and Privacy Commissioner
2 Canada Drive
P. O. Box 13004, Stn. A
St. John’s, NL. A1B 3V8

Telephone: (709) 729-6309
Toll-Free: 1-877-729-6309
commissioner@oipc.nl.ca

You may also appeal directly to the Supreme Court within 15 business days after you receive the decision of the public body, pursuant to section 52 of the Act (a copy of this section has been enclosed for your reference).

Please be advised that this request may be published on the [Completed Access to Information Requests](#) website. Requests will be posted when possible, but no sooner than three business days after a response is sent electronically, or five business days where a response is sent by mail. Please note that requests for personal information will not be posted online. Additional details regarding the process for publishing requests online can be found [here](#).

If you have any further questions, please feel free to contact me via e-mail at ATIPP-Health@gov.nl.ca.

Sincerely,

Ana Carolina de Almeida
Access to Information Coordinator

Access or correction complaint

42. (1) A person who makes a request under this Act for access to a record or for correction of personal information may file a complaint with the commissioner respecting a decision, act or failure to act of the head of the public body that relates to the request.

(2) A complaint under subsection (1) shall be filed in writing not later than 15 business days.

(a) after the applicant is notified of the decision of the head of the public body, or the date of the act or failure to act; or

(b) after the date the head of the public body is considered to have refused the request under subsection 16(2).

(3) A third party informed under section 19 of a decision of the head of a public body to grant access to a record or part of a record in response to a request may file a complaint with the commissioner respecting that decision.

(4) A complaint under subsection (3) shall be filed in writing not later than 15 business days after the third party is informed of the decision of the head of the public body.

(5) The commissioner may allow a longer time period for the filing of a complaint under this section.

(6) A person or third party who has appealed directly to the Trial Division under subsection 52(1) or 53(1) shall not file a complaint with the commissioner.

(7) The commissioner shall refuse to investigate a complaint where an appeal has been commenced in the Trial Division.

(8) A complaint shall not be filed under this section with respect to

a) a request that is disregarded under section 2;

b) a decision respecting an extension of time under section 23;

c) a variation of a procedure under section 24; or

d) an estimate of costs or a decision not to waive a cost under section 26.

(9) The commissioner shall provide a copy of the complaint to the head of the public body concerned.

Direct appeal to Trial Division by an applicant

52. (1) Where an applicant has made a request to a public body for access to a record or correction of personal information and has not filed a complaint with the commissioner under section 42, the applicant may appeal the decision, act or failure to act of the head of the public body that relates to the request directly to the Trial Division.

(2) An appeal shall be commenced under subsection (1) not later than 15 business days

(c) after the applicant is notified of the decision of the head of the public body, or the date of the act or failure to act; or

(d) after the date the head of the public body is considered to have refused the request under subsection 16(2).

(3) Where an applicant has filed a complaint with the commissioner under section 42 and the commissioner has refused to investigate the complaint, the applicant may commence an appeal in the Trial Division of the decision, act or failure to act of the head of the public body that relates to the request for access to a record or for correction of personal information.

(4) An appeal shall be commenced under subsection (3) not later than 15 business days after the applicant is notified of the commissioner's refusal under subsection 45(2).