



Llywodraeth Cymru
Welsh Government

Our ref: ATISN 16921
Date: 19 December 2022

Dear ,

ATISN 16921 – Welsh Government relations with the State of Qatar

Thank you for your request which I received on 1 December 2022. You asked for:

- 1. All governmental engagements with Qatari officials regarding investment opportunities between Wales and the State of Qatar since January 2018.*
- 2. The dates of these engagements and the ministers who attended from both sides.*
- 3. A breakdown of Qatari state investment in Wales on a sector-by-sector basis.*
- 4. Any written correspondence issued by the Welsh Government to the State of Qatar on human rights issues in the Gulf region since 5 June 2022.*
- 5. The Qatari officials present at meetings attended by the Welsh First Minister and the Welsh Minister for the Economy during their visit to Qatar for the FIFA World Cup.*

Some of the information you have requested is detailed below.

Some of the information you have requested is exempt from disclosure and I have set out my reasonings at **Annex A**.

1. No meetings have taken place between Welsh Government officials and Qatar Government officials to discuss investment opportunities in the timeframe specified. Meetings to discuss investment opportunities have taken place with organisations outside of government but this information is exempt from publication under Section 29 (the Economy).

2. Details of Ministerial meetings are exempt under Section 21 and Section 22 of the Freedom of information Act 2000 – information accessible by other means and information intended for future publication. A register of all ministerial meetings and engagements is published online every quarter in accordance with the Ministerial Code and can be found here [Ministerial meetings and engagements | GOV.WALES](#). The information for the financial year 2022-23 will be published after March 2023.
3. South Hook LNG in Pembrokeshire is the only Qatari-owned company that is operating in Wales, known to Welsh Government. Its majority shareholder is Qatar Energy and, according to [Companies House records](#), it was incorporated in Wales in 2003.
4. The information requested is exempt under Section 21 (Information accessible to applicant by other means) and/or Section 27 (International Relations) of the Freedom of Information Act 2000.

The Minister for Economy wrote to the Qatar Ambassador to the UK on 9 November 2022 following comments made by a Qatar world cup ambassador. He outlined a summary of this letter during a statement to the Senedd on 15 November 2022. A link to the statement is at: <https://record.assembly.wales/Plenary/13045#A75801> (paragraph 203 onwards). Therefore, section 21 applies.

Section 27 is a qualified exemption, and a Public Interest Test has been applied to the full detail of the requested correspondence.

5. The Welsh Government does not have a record of this information.

If you are dissatisfied with the Welsh Government's handling of your request, you can ask for an internal review within 40 working days of the date of this response. Requests for an internal review should be addressed to the Welsh Government's Freedom of Information Officer at:

Information Rights Unit
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

or e-mail: Freedom.ofinformation@gov.wales

Please remember to quote the ATISN reference number above.

You also have the right to complain to the Information Commissioner. The Information Commissioner can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone: 0303 123 1113

Website: www.ico.org.uk

However, please note that the Commissioner will not normally investigate a complaint until it has been through our own internal review process.

Yours sincerely

Reasons for Exempting Information

Section 21: Information accessible to applicant by other means

The exemption states:

(1) Information which is reasonably accessible to the applicant otherwise than under section 1 is exempt information.

(2) For the purposes of subsection (1) —

(a) information may be reasonably accessible to the applicant even though it is accessible only on payment, and

(b) information is to be taken to be reasonably accessible to the applicant if it is information which the public authority or any other person is obliged by or under any enactment to communicate (otherwise than by making the information available for inspection) to members of the public on request, whether free of charge or on payment.

(3) For the purposes of subsection (1), information which is held by a public authority and does not fall within subsection (2)(b) is not to be regarded as reasonably accessible to the applicant merely because the information is available from the public authority itself on request, unless the information is made available in accordance with the authority's publication scheme and any payment required is specified in, or determined in accordance with, the scheme.

Section 22: Information intended for future publication

The Welsh Government believes that Section 22 is applied in relation to the requested information. Section 22 of the Freedom of Information Act is subject to the public interest test. This means that in order to withhold information under its provisions, any personal interest of the requester notwithstanding, it has to be shown that the public interest in withholding the information outweighs that in releasing it.

Public interest arguments in favour of release

The general presumption of openness and transparency, which the Freedom of Information Act aspires to.

Public interest arguments in favour of withholding

This information is published as a requirement of the Ministerial Code. This information will be published, along with details of other Ministerial visits overseas, according to the usual schedule. The information for the financial year 2022-23 will be published after March 2023. The Welsh Government acknowledges the public interest in openness and transparency, and it is a long-standing requirement that details of Ministerial visits overseas, including the costs, are published in line with the Ministerial Code.

Therefore, we believe the public interest would be better served in the information being published at the appropriate time. To that end, I believe the information should be withheld under s22 of the Act, until it is published in due course at the following links: [Ministerial Code information publication: 5th assembly | GOV.WALES](#) and <https://gov.wales/ministerial-code-information-publication-5th-assembly>.

Section 27: International Relations

The exemption states:

Section 27(1) Information is exempt if its disclosure would, or would be likely to, harm UK interests which are set out in the exemption.

Sections 27(2) and (3) provide an exemption for information obtained in confidence from another state, international organisation or international court.

Section 27(4) provides an exemption from the duty to confirm or deny whether information is held if doing so would or would be likely to prejudice the interests protected by section 27(1) or would involve the disclosure of confidential information protected by section 27(2).

Public interest arguments in favour of release

The Welsh Government acknowledges the general public interest in openness and transparency that release would engender. Further, we recognise that there is public interest in understanding the process by which the Welsh Government discusses certain policy matters and that the release of the information could lead to greater transparency and openness in the way the Welsh Government conducts business with other administrations, which can improve accountability and public trust.

Public interest arguments in favour of withholding

I have considered the information held and believe that releasing the details of the letter would be prejudicial to the Welsh Government's future ability to have frank and open discussions with international stakeholders, including governments, and would affect the Welsh Government's ability to gather information to conduct effective policy making across a wide number of areas with other countries and governments. It is important that we maintain a relationship with individual governments and countries and the release of this information will inhibit the openness of discussions and engender distrust.

Disclosure of the information would be likely to result in trust and confidence being eroded and a reluctance to share information which would be likely to prejudice relations between both parties on both this and other matters, particularly where the withheld information involves a subject matter which may still pertain to current and or future considerations by the Welsh Government. Such prejudice would not be in the public interest.

Furthermore, the release of this information would result in the erosion of trust with other countries and governments not directly affected by the disclosure of this information, who would view its release with distrust in the Welsh Government's ability to maintain confidentiality in discussions and correspondence with them.

I believe therefore that the balance of the public interest falls in favour of withholding the withheld information for the reasons outlined above.

Section 29(1): The Economy

The exemption states that information is exempt if its disclosure would, or would be likely to prejudice:

- (a) the economic interests of the United Kingdom or of any part of the United Kingdom, or
- (b) the financial interests of any administration in the United Kingdom

This is a qualified exemption; therefore, a public interest test has been undertaken.

Public interest arguments in favour of release

The Welsh Government acknowledges the general public interest in openness and transparency that release of this information would engender. Furthermore, I recognise that there is public interest in understanding the process by which the Welsh Government generates investment into Wales and that the release of the information could lead to greater transparency and openness in the way the Welsh Government conducts business which can improve accountability and public trust.

Public interest arguments in favour of withholding

One of the key objectives of the Welsh Government is to grow the Welsh economy. The Welsh Government invests significant resource in identifying and engaging with companies that are making investment decisions, to try to ensure that Wales is considered as part of those decision-making processes.

We believe that the early release of information relating to discussions with potential investors would be likely to prejudice those discussions with the result that some, or all, of the potential investors decide to invest elsewhere. The disclosure of information at such an early stage in discussions would be likely to instil a sense of distrust amongst potential investors at the Welsh Government's ability to maintain a confidence. The result of this would be the potential loss of new investors, and a subsequent loss to the economy of Wales.

I believe therefore that the balance of the public interest falls in favour of withholding the withheld information for the reasons outlined above.

For this reason, the exemption at s29(1) is engaged.