

22 January 2026

Dear

**ATISN 26442 / 26567**

**Information requested**

Thank you for your request which I received on 3 December 2025 and 13 January 2026. I apologise for the delay in responding to your first request.

You asked for:

- Copies of all minutes of all meetings held by the Marine Nitrates Development Taskforce to date.
- The dates of each meeting.
- A list of attendees (or represented organisations)
- Any accompanying papers, reports, or presentations considered during these meetings.

**Our response**

The information you requested is enclosed.

I would also like to draw your attention to the public updates published by the Welsh Government setting out the progress of the Taskforce, including through Written Statements on 10 October and 17 December 2025. Further updates will be provided in the future as the work of the Taskforce progresses.

**Regulation 13– Personal data**

Regulation 13(1) together with the conditions in Regulation 13(2)(a)(i) and 13(2)(a)(ii) provides an absolute exemption if disclosure of the personal data would breach any of the data protection principles.

‘Personal data’ is defined in sections 3(2) and (3) of the Data Protection Act 2018 (‘the DPA 2018’) and means any information relating to an identified or identifiable living individual. An identifiable living individual is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the individual.

We have concluded that, in this instance, the information requested contains third party personal data.

Under Regulation 13(1) of the EIRs, personal data is exempt from release if disclosure would breach one of the data protection principles set out in Article 5 of the GDPR. We consider the principle being most relevant in this instance as being the first. This states that personal data must be:

*“processed lawfully, fairly and in a transparent manner in relation to the data subject”*

The lawful basis that is most relevant in relation to a request for information under the FOIA is Article 6(1)(f). This states:

*“processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child”.*

In considering the application of Article 6(1)(f) in the context of a request for information under FOIA it is necessary to consider the following three-part test:-

- **The Legitimate interest test:** Whether a legitimate interest is being pursued in the request for information;
- **The Necessity test:** Whether disclosure of the information/confirmation or denial that it is held is necessary to meet the legitimate interest in question;
- **The Balancing test:** Whether the above interests override the interests, fundamental rights and freedoms of the data subject.

Our consideration of these tests is set out below:

### **1. Legitimate interests**

We recognise that there is potentially a legitimate interest in the identification of specific taskforce representatives for the purposes of transparency and public accountability, particularly where a question may arise around appropriate levels of decision making or authority.

### **2. Is disclosure necessary?**

The request asks for participants **or** represented organisations, and the release clearly fulfils the latter. The information supplied shows clear organisational ownership and is not meaningfully enhanced by including individuals’ data, nor is it a necessary part of fulfilling the stated request.

### **3. The balance between legitimate interests and the data subject’s interests or fundamental rights and freedoms**

I have concluded that on balance, disclosure of individual details is not necessary in this case. Individual taskforce participants are clearly appointed representatives of their

organisations rather than participating in an individual capacity. They have participated in meetings with a reasonable expectation that their personal information was not intended for publication. Participants comprise a variety of organisational seniorities and contribute in different capacities. Where individuals' information is

referred to from background papers, the data subject is unlikely to be aware that their participation in other fora may result in their personal information being released in a public forum.

### **Next steps**

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 Email: [Freedom.ofinformation@gov.wales](mailto: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.

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

Yours sincerely