

Dear

ATISN 26841 Internal Review Response – Head of Governance Policy

An internal review of your request for information under the Freedom of Information Act 2000 ('the Act') dated 27 March 2026 (reference ATISN 26841) has been undertaken. This followed your email correspondence of 30 April (addressed to the Freedom of Information Officer) in which you requested an *'internal review under Regulation 11 of the Environmental Information Regulations 2004... undertaken by someone who is independent of the Climate Change and Environmental Sustainability Directorate, the Strategy and Change Team and the policy area whose conduct and records are the subject of this request'*.

Please note that an internal review is concerned only with the outcome and/or handling of the request for information.

The review has now been completed, and this letter sets out the outcome of the review.

In your request for information regarding the Head of Governance Policy, dated 27 March, you requested disclosure of:

1. Any policy papers, briefing notes, draft policy documents, reports or internal memoranda produced, authored, commissioned or substantively contributed to by the Head of Environment Governance Policy during the period specified, where the subject matter relates to environmental governance, environmental regulation or environmental policy in Wales.
2. Any ministerial submissions, advice notes or briefing materials prepared for Welsh Government ministers during the period specified where the Head of Environment Governance Policy has provided input or contribution.
3. Any meeting minutes, agendas, notes or action logs for meetings attended by the Head of Environment Governance Policy during the period specified where environmental policy, environmental regulation, water quality, sewage discharge, river management or related environmental matters were discussed.
4. Any programme board papers, working group papers or governance documents produced during the period specified where the Head of Environment Governance Policy participated or contributed.
5. Any recorded information identifying the policy areas, workstreams or programme activity assigned to or undertaken by the Head of Environment Governance Policy during the period specified.
6. Any internal correspondence, including emails or other recorded communications, held by Welsh Government during the period specified which record substantive policy discussion or input from the Head of Environment Governance Policy on matters relating to environmental governance, environmental regulation or environmental policy.

In relation to your request for recorded information, the Welsh Government response stated that for points 2, and 6, no information was held as the Head of Environment Governance Policy had not provided input to any Ministerial submissions, advice notes or briefing

materials and there was no information held in relation to substantive policy discussion or input for the period requested.

For point 4, it was confirmed that a Programme Board had not been established at this time, and no timescales had been agreed.

Points 1 and 3 were deemed to be exempt under section 12(4)(d).

Information related to Point 5 had already been released via a separate Freedom of Information request (ATISN 26782), which was sent to you on the 8 April 2026.

Internal review response

As required, this review has been undertaken independently of the team who were the subject of the original request. I understand the points you raise in respect to the original response being issued by the Policy and Governance team and your concerns that this constituted a conflict of interest. However, I would like to reassure you that this is standard procedure when responding to Freedom of Information requests.

The internal review has reassessed whether reasonable and proportionate searches were undertaken to identify recorded information within the scope of your request and the rationale supporting any exemptions.

The review has established that officials within the Policy and Governance team undertook searches to establish whether any recorded information was held which matched the description of your request, set out in points 1 to 6 of your email. These searches were adequately and sufficiently undertaken and included electronic records such as emails, drafts, internal notes, meeting papers and records of workshops with stakeholders.

I find that officials correctly interpreted the request as being for information that recorded substantive policy discussion, which would include those led by (i.e. produced, authored, commissioned) or substantively contributed to by the Head of Environmental Governance, and confirm that none is held in relation to points 2 and 6 in your original request.

Purely administrative emails, which were described in your request for a review, do not appear to be what you asked for in your original Freedom of Information request. Should you require any recorded information beyond this, it will be treated as a new request.

Information which was deemed to fall under 12(4)(d) (responses to points 1 and 3 in your original request) has been reviewed. I found that the searches were adequately undertaken and included consideration of any information that might fall within the search criteria. I also found that with regards to the public interest test, as set out in Annex A of the original response letter, your request was considered with reference to the Environmental Information Regulations and careful thought was given to the public interest arguments in favour of release and those public interest arguments in favour of withholding.

I have considered these points, and in the interest of transparency, the following information is appended:

A schedule of the meetings attended by the Head of Environment Governance is listed below:

Date and title	Role in meeting	Internal/external	Minutes held
2 March- Regular catch up WG/Defra- Environmental strategies and governance	Introduction to Defra colleagues, listening.	External	No (Meeting cancelled by DEFRA)
5 March- Nutrient trading mapping policy interdependency and uncertainty	Listening / learning.	External	No
12 March- Environmental Principles and Integrating	Listening / learning / reviewing future work plan.	Internal	No
24 March- NRW/WG forum- shaping the development of the Natural Resources	Presenting, facilitating workshop	External	Yes (in draft form as this is part of a series of three meetings over a period of time which will come to a single combined record on conclusion)

In addition, the following two documents, Annex A and B are appended to this letter. Annex A is a proposed approach to policy development work, and Annex B relates to a draft specification for a PhD research student placement. These documents are included as although they are part of the wider policy-making process, they relate to planned work, rather than detailed policy discussions.

Should you remain dissatisfied, you have the right to complain to the Information Commissioner's Office ('ICO'). The ICO contact details were provided in the response on 29 April.

Should you consider that there has been maladministration in the handling of and/or response to your request for information, you have the option to make a complaint to the Public Services Ombudsman for Wales:

Public Services Ombudsman for Wales
1 Ffordd yr Hen Gae
Pencoed
Bridgend
CF35 5LJ
Email: ask@ombudsman-wales.org.uk

Yours sincerely,

Jo Larner
Deputy Director Vaccinations

Annex A – Environment Governance Policy – year plan

Environment Governance Policy (*Side comment by REDACTED 09 March 2026 13:15 – I've highlighted in yellow where I think there is cross over – suggest we pull these into a joint plan*)

Priorities for 12 months

1. Environmental Governance/Principles statement
2. Mapping of the relevant legislation
3. Ambition of the Directorate – Directorate event
4. Themes and supporting policy options – a menu for a new administration

1. Environmental Governance/Principles statement

Actions

Ensure close relationship with IEAPW and new OEGW

Ensure alignment with Natural Resource Policy refresh via Environmental Governance and NRP programme board

Review integrated impact assessment to best understand how the principles can be applied into policy making

Understand other vehicles and steps for policy making that the principles could be integrated into

Understand other relevant legislation and where it can be applied in tandem/complimentary within the policy making

Map internal and external stakeholders in conjunction with NRP

Consultation undertaken

Create resources including presentation, comms pack and simplified guide/plan on a page (*Side comment by REDACTED 09 March 2026 12:03 – suggestion we do this within the programme board as there will be a lot of overlap*)

Disseminate principles to various stakeholders using clear communication resources possibly events/meetings

Measure – how do we know we did well?

- Statement complete and accepted, clear links within the statement to other relevant legislation
- Stakeholders informed and actively applying principles within policy making
- Reference resources available for stakeholders to refer to
- The principles have been embedded in the processes used for impact assessment.

2. Map relevant and complimentary legislation, strategies, plans and policies

Actions

Define 'relevant' in the context of the principles/directorate.

Research current legislation, policy, strategies and plans relevant to the environmental governance principles. (*Side comment by REDACTED 11 March 2026 09:56 – phd placement*).

Meet with other departments within and outside of the directorate to understand policy relevant to them and potential impacts on the implementation of the principles (*Side comment by REDACTED 11 March 2026 09:58 – REDACTED to find NRW link*).

Identify any possible conflicting proposals or commitments e.g house building vs nutrients/habitats directive and NBB and map by hierarchy e.g legal duty vs commitment vs ambition.

List relevant groups run by or attended by Welsh Government and specifically their remit

Measure – how do we know we did well?

Definition written (3/4 lines) of what 'relevant' and 'complimentary' means in context of the principles

- Central repository of files in ishare of relevant plans, strategies, policy and legislation organised by type
- Document stating the relationship, complementary items and possible conflicts of all

3. Ambition of the Directorate – Directorate event

Actions

Discuss concept for the day with *REDCATED* – propose a look back and **a look forward**. What environment legislation has Wales implemented that was unique or trail blazing?
What do the new gov want to deliver- this is the mission. Some stuff carries on regardless, some will be new. This is the new governments agenda. Take stock.
Prepare 4/5 case studies with examples ‘Hero schemes’ and ‘on the ground’ improvement. Collect statistics and identify people impacted positively. Could try - recycling rates/circular economy, plastic bag charge, single use plastics bill, Storm overflow approach vs England.
Prepare interactive activity? What does good look like to you- Lifestyle, culture, environment- ‘coloured in picture’ of the future. Where do you live? What does it look like? What does it smell like (spring blossoms not car exhaust)? What does it sound like? Could we have a large board to fill in in the foyer during the day.
Prepare workshop including breakout rooms for forward look/setting the ambition and ‘what does good look like’ and how do we get there?

Evidence- how do we measure the impact of what we do?

Ministerial attendance- set the expectation of the department- this is what we can do...

Book venue

Confirm attendees

Prepare MS forms feedback form for staff (is there an existing employee engagement survey?) with QR code link – anonymous.

Send diary marker

Measure – how do we know we did well?

- Engaged staff/feedback of the day collected
- Clear vision on how each department contributes to the directorate’s success – this can be used to set targets long and short term
- Draft programme of work for 12/24 months

4. Themes and supporting policy options – a menu for a new administration

Actions

Understand the key environment themes within each manifesto- Food security, pollution, etc for each party
Map each of the principles, strategy, legislation, plans and groups that already exist to support these key themes (using priority #2 work above)
Outline in broad terms what actions could be taken further on each topic and what might limit action
Create clear and non technical offering for new ministers use. Should include links to each department.
Note conflicts within manifestos. An example net zero vs stock numbers.

Measure – how do we know we did well?

- Document created with existing policy, plans, strategies and legislation mapped to themes within manifesto
- Non technical document produced for use by the new administration

Annex B – PhD placement - draft 1.

3-month Environmental Principles/Natural Resources Policy Placement

Objective

To support the implementation of the new Environment (Principles, Governance and Biodiversity Targets) (Wales) Bill, helping to embed the principles within policy and decision making across the public sector. The key objective is to research and identify relevant environmental targets, strategies, policies, commitments and regulations applying in Wales to improve clarity around where the principles should apply.

Drivers

There is a need to communicate with a variety of stakeholders their duties under the requirements of the new ‘Environment (Principles, Governance and Biodiversity Targets) (Wales) Bill. This research will also

support stakeholder engagement around a revised Natural Resources Policy and the future environmental governance legislative framework.

In order to make the most from the opportunities around implementation, and to be clear, to simplify and to reduce confusion about their obligations WG will produce a pack of resources to disseminate to stakeholders (working title) 'your decision making for the environment'. This pack will include reference to other relevant legislation, the principles, published targets or external commitments all in one place.

To create this resource pack we must know all the relevant and applicable national environment targets and requirements.

Action

Research published materials to gather commitments. You can make use of Welsh Government library services to do so.

Document each commitment, whether it is still relevant, when it is due, who it applies to etc. you may start with Water Framework Regulations, 30 by 30 etc. commitments.

Include links to all published documentation when possible and save copies in a new ishare folder for future reference. Where possible please also save any guidance, resources or communication pieces related to each commitment.

The items for inclusion could be duties that are placed on Welsh Ministers, local authorities, Natural Resources Wales, other public bodies or persons who are appointed to undertake statutory functions such as the Well-Being of Future Generations Commissioner. We are looking for reporting etc requirements that **apply in relation to Wales.**

For each of these reports, reviews etc, what we need recorded is:

- the section number and Act where the duty to report etc is found;
- a very short summary (just a line or two) setting out what the duty entails;
- on whom the duty to prepare a report etc is placed (eg Welsh Ministers);
- the timing and frequency of the reporting etc duty – eg annual, within one year of Senedd elections etc;
- to whom the report, action plan, review etc must be sent and any publication or laying requirements (eg record if a report or review needs to be laid before the Senedd);

An example of how this could be presented is below.

Commitment	Originator organisation	Name	Whats required and who does it apply to	By when	Hyperlink	What resources already exist or were produced at the time
Legal	WG	Water Framework Directive	'Good' status for waterbodies, all Wales. Monitored and reported by NRW.	2027		
Manifesto						
		30 by 30		2030		

At the end of your placement you will be asked to present your work internally.

It may be worth considering where this work can be taken next, particularly in terms of ranking/prioritising those which should be considered in stakeholder resources, benchmarking environmental performance against other nations, or identifying where there may be a risk of not meeting expectations and the likely consequences of this.

Key contacts

- **REDACTED**
- **REDACTED**
- **REDACTED**
- ...