

2 June 2026

Dear

Thank you for your request, which we received on 3rd May 2026. You asked for the following information:

For the last 5 financial years the:

1. Total compensation paid for poultry culled under statutory avian influenza control measures.
2. Total number of poultry culled under statutory avian influenza control measures.
3. Any internal summaries, briefing notes, or reports produced in the last five years that outline:
 - total public expenditure on avian influenza related culls
 - sector level exposure within the poultry industry
 - financial pressures or budget impacts arising from avian influenza outbreaks
4. Regional or county level totals for avian influenza related compensation payments

Our response

1. £5,771,802.9. This figure relates to compensation for poultry culled under statutory avian influenza control measures in Wales only (for the last 5 financial years).
2. The Welsh Government does not hold this information. However, we believe the Animal and Plant Health Agency may hold this information.
3. We can confirm Welsh Government holds some of the information that is captured by part 3, but this is withheld under EIR Regulation 12(4)(b) – Manifestly Unreasonable. See Annex A to this letter for my full reasons for applying this exception.

4.

County	Total compensation payments £ (last 5 financial years)
Pembrokeshire	4,010,499.27
Powys	1,286,091.49
Denbighshire	211,730
Anglesey	184,730.14
Wrexham	78,545
Gwynedd	207.00

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

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

Annex A: Application of Exceptions

Regulation 12(4)(b) – Manifestly Unreasonable

We can confirm that we hold information relating to question 3 of your request. From our preliminary assessment, we find that that your request is likely to be very time consuming to deal with.

In the first instance, we are of the view that the information you want us to search for is environmental information and as such we have considered your request under the Environmental Information Regulations 2004 (EIRs). ‘Environmental information’ is defined in the Regulations as (inter alia) ‘information on measures (including administrative measures), such as policies, legislation, plans, programmes, environmental agreements, and activities affecting or likely to affect the state of the elements of the environment, such as air and atmosphere, water, soil, land, landscape and natural sites, and also factors such as substances, energy, noise, radiation or waste likely to affect the state of the elements of the environment above’.

We have concluded that your request is both voluminous and complex and will be very time consuming to deal with. Under the EIRs, there is no appropriate costs limit above which public authorities are not required to deal with requests for information. However, Reg 12(4)(b), manifestly unreasonable request, can apply if the cost or burden of dealing with a request is too great. This position was confirmed in the Upper Tribunal case of *Craven v The Information Commissioner and the Department of Energy and Climate Change* [2012] UKUT442 (AAC).

“Taking the position under the EIR first, it must be right that a public authority is entitled to refuse a single extremely burdensome request under regulation 12(4)(b) as “manifestly unreasonable”, purely on the basis that the cost of compliance would be too great (assuming, of course, it is also satisfied that the public interest test favours maintaining the exception). The absence of any provision in the EIR equivalent to section 12 of FOIA makes such a conclusion inescapable.”

In order to provide you with the information that you have requested, searches must be undertaken across all Welsh Government divisions that may hold information in scope. This includes, but is not limited to, the Office of the Chief Veterinary Officer, Emergency Response, Health and Public Health. In initial searches of electronic files in one division, we have already identified over 120 documents of various sizes and complexity which may be related to your request. Each of these documents would need to be manually reviewed to consider whether they are wholly or partially within scope of your request, and to locate extract and collate the information you require.

To determine if these relate to any of the three subject areas you have outlined it would be necessary for all these documents be extracted and read. Based on a sample exercise, this process took no less than 5 minutes per document, and for longer documents, this took up to 15 minutes. On average we estimate that we require 10 minutes per document to conduct this manual review.

We estimate this initial sample of 120 documents is likely to be repeatable in other divisions with information in scope, and that there will thus not be less than 480

documents requiring this manual review, and thus we believe that 80 hours of work would be required to answer this part of your request, which cannot be automated. This, therefore, meets the definition of “voluminous and complex” and cost of compliance would be excessive.

Public Interest Test

Reg 12(4)(b) is subject to the public interest test. We have given consideration to the public interest in disclosing the information. The Welsh Government recognises the general public interest in openness and transparency and that releasing the information would help the public gain a better understanding of the topics in question and decisions made to improve policy and guidelines on the control of avian influenza. The matter of avian influenza is clearly of public interest, as is the accountability of government for expenditure, and transparency in the implementation and development of policy.

However, question 3 of the request doesn't just capture reports, for which Welsh Government is committed to publishing in the public domain, but all notes and internal summaries (which may also include email summaries) in any area of Welsh Government, whether administrative or regarding the development of policy or collection of evidence. As Welsh Government is committed to transparency on this subject, the public interest described above would be met in publication of reports, without the need to capture all notes and memos that went into the process.

The Welsh Government therefore considers the balance of the public interest lies in favour of refusing your request. This is because it is believed your request would place a substantial and unreasonable burden on Welsh Government resources, which are already stretched, and on balance, it is considered the public interest would be better served by deploying our resources in undertaking core work. As part of these considerations, we have applied the statutory presumption in favour of disclosure under Reg12(2) of the Regulations, but our view is that the significant burden that this request would impose outweighs the public interest in releasing this information.

Your request is therefore refused under Reg 12(4)(b) – manifestly unreasonable, of the EIRs, for the reasons outlined above. Nevertheless, we have decided to interpret this narrowly only to question 3 of your request, so that we may disclose information to you on the other questions.

The Welsh Government publishes a practical guide on making requests for information on GOV.WALES: [Requesting information from the Welsh Government](#).

This will explain how you may wish to narrow down and focus your request, e.g., by describing the information you hope to locate, as well as any associated dates or other information that would assist us in identifying and locating the information you require.