

1 July 2026

Dear

ATISN 27126 – Request for Information

Thank you for your request which I received on 22 June 2026. You asked for:

All information shared by the Welsh Government with Pembrokeshire County Council since 1 January 2018 relating to four named individuals, Cole Farms Ltd., and Cwm Farm, Llawhaden, Pembrokeshire. You said this was to include but not be limited to:

- Animal welfare matters;
- Animal health matters;
- Livestock identification and traceability;
- Animal movements;
- Cattle, sheep, pig, poultry or other livestock records;
- Agricultural compliance matters;
- Cross-compliance inspections;
- Rural Payments Wales investigations or referrals;
- Environmental compliance matters;
- Planning, land-use or agricultural regulatory issues;
- Enforcement actions, investigations, complaints, referrals or intelligence reports;
- Communications concerning potential breaches of legislation, regulations, licence conditions, or statutory obligations;
- Any reports or correspondence sent to, shared with, or discussed with Pembrokeshire County Council by Welsh Government departments.

You asked to be provided with:

1. Copies of all relevant reports, communications, correspondence, emails, letters, meeting notes, briefing notes, memoranda, referrals, notifications, and records.
2. The dates on which such information was provided to Pembrokeshire County Council.
3. The Welsh Government department or body responsible for providing the information.
4. Any reference numbers associated with the reports or communications.

Our response

I can confirm that we hold information relating to your request. From my preliminary assessment, I find that that your request is likely to be very time consuming to deal with.

In the first instance, I am of the view that the information you want me to search for is environmental information and as such I 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'. The areas you say should be included are areas where information held would thus be environmental information.

I 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 understand the scope of this request, officials undertook preliminary work to identify where information may lie and what would be necessary to extract and collate that information. Your request, just limited to the policy areas you have highlighted (and you expressly state it should not be limited to just these) requires us to search across eight policy divisions. Your request captures emails and other written records. I have had replies from most policy divisions, and find that on average, they believe 5 officials per division will have emails that may be in scope of this request. In order to determine if emails are in scope, it is necessary for those officials to manually review such emails. The returns indicate that, on average, 50 emails must be reviewed per person. This is a manual review, that involves using keyword searching to find the emails, opening and reading the email, and then saving any emails that are found to be in scope. In an exercise, we found this manual review took on average 3 minutes per email. On this basis alone, I estimate that the time required to locate just the emails in scope of your request would be 8 (divisions) x 5 (officials) x 50 (emails) x 3 (minutes) = 6000 minutes, or 100 hours of work.

In addition to the search of emails, we would need to conduct searches of our registered files, which, considering the very broad framing of this search, would be likely to result in a similarly extensive search, requiring manual review of many documents. However, since the email search alone is excessive, it is clear that the whole request is excessive, and 100 hours of work is very much the lower bound for this request.

Public Interest Test

Reg 12(4)(b) is subject to the public interest test. I have given consideration to the public interest in disclosing the information. The Welsh Government recognises the general public interest in openness and transparency.

However, in this case there does not appear to be a clearly identified public interest explaining why all communications and records that merely mention named individuals or entities, across a whole raft of policy areas, has any particular public interest. If the request were focused on the type of information that you hope would be held, it would better enable us to locate and consider the public interest for such information, but in the absence of any countervailing public interest, it would not be in the public interest that Welsh Government spend considerable resource, at public expense, searching for any information across so many policy areas.

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 not deploying our resources at the expense of 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.

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