



Llywodraeth Cymru
Welsh Government

Ein cyf/Our ref ATISN 27270

7 August 2026

Dear ,

ATISN 27270 – Request for Information

Thank you for your request which I received on 28 July 2026. You asked for:

Copies of all correspondence relating to Net Zero sent between Welsh Government Cabinet Ministers/Deputy Ministers (including First Minister and Deputy First Minister) from the day they assumed their posts to the date of this request. You were specific that this request was for all correspondence on this subject matter sent from one Minister to another (or more). You also asked that the request include, but not be limited to:

1. Emails, letters, messages, meeting notes, and other written communications exchanged between Ministers and/or their officials;
2. Correspondence that discusses, references, or forwards communications about Net Zero;
3. Attachments, briefing notes, reports, or documents shared as part of such correspondence.

I have thus interpreted the request at point 1 to include all communications between officials and one or more ministers, in addition to any exchanges directly between Ministers.

Our response

I can confirm that we hold information relating to your request. However, from my preliminary assessment, I find that that your request is likely to be unreasonably time consuming to deal with. I have set out the rationale below.

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. In all there are seven divisions we believe are likely to have information in scope of this request. As you ask for “Correspondence that discusses, references, or forwards communications about Net Zero”, it is possible that there may be information in other parts of Welsh Government, but as you ask specifically for information that was sent to Ministers, we believe it reasonable that the information you require will only be found in one of seven divisions.

We asked officials in one division to ascertain through initial searches how many briefings, communications or documents they held in the scope of the request. They identified a candidate list of 50 documents (plus attachments), but it is not possible to tell from keyword searches alone whether these documents are captured or not. In order to extract and collate the requested information, each of these documents must be extracted from our electronic filing system and then read. In addition to the communication, and subject to your point 3 above, officials must also extract the attachments, briefing notes, reports or other documents shared as part of these 50 communications. In an exercise, we found that the average time to review these individual communications was five minutes. This is a manual process and cannot be automated.

On this basis, and on the assumption that a similar number of communications will be found in each division, I calculate it would take over 29 hours to review all the relevant communications to see if they are captured by the request, and to extract and collate them. This does not include the additional time that may be required to redact any information from the documents that may be withheld under another exception.

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).¹ Under the EIRs, there is no appropriate costs ceiling below which public authorities must 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.”

I have concluded that your request meets the definition of manifestly unreasonable, owing to the burden it would place on the authority to comply with the request. I note that additionally, point 2 above, “correspondence that discusses, references or forwards communications...” potentially captures an unknown additional quantity of correspondence, other than just the Ministerial correspondence, that is likely to be very large and even more time consuming to locate.

¹ 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’.

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 and that releasing the information would help the public gain a better understanding of the policy process.

Your request does not specify what you are looking for, but asks only for all communications on a subject area. Without understanding what information you require, it is difficult to identify a specific public interest beyond the commitment to openness and transparency.

Against this, it is not in the public interest that Welsh Government expend considerable resource in locating, collating and extracting all information that merely mentions a policy area. Such a trawl of information will be expensive to complete, will pull a significant number of officials away from core policy work, and does not meet a clearly identifiable public interest.

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 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