

Dear

ATISN 27252 – BOVINE TB

Information requested

Thank you for your request which I received on 23 July 2026 and clarified on 28 July 2026 where you asked for:

Copies of all information relating to meetings held by the Rural Resilience and Sustainability Department during the period 12 May 2026 to 23 July 2026 in which bovine tuberculosis (bovine TB) was discussed, referenced, or otherwise mentioned.

Our response

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).

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 begin to understand the scope of this request, officials undertook preliminary illustrative work, based on meetings attended by 2 officials (the Chief Veterinary Officer for Wales and the Head of Bovine TB Policy) to identify the extent of the meetings, where information may lie and what would be necessary to extract and collate that information. I acknowledge, however, that your request is far wider than this, spanning a number of teams and Divisions within the Rural Resilience and Sustainability Department.

The Chief Veterinary Officer for Wales and the Head of Bovine TB Policy attended at least 77 meetings during the time period requested. Therefore, in order to provide you with part of the information that you have requested would require searches to be undertaken in respect of at least 77 meetings. I conservatively estimate it would take, on average, 20 minutes to consider whether each meeting falls within the scope of your request and to extract and collate the requested information. This

would need to be replicated across multiple teams and divisions within the Rural Resilience and Sustainability Department to furnish you with all the information you have requested and would take significantly longer.

Public Interest Test

Public Interest Test Reg 12(4)(b) is subject to the public interest test. I have considered 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 meetings that have taken place where bovine TB has been mentioned. The matter is clearly of public interest given the sometimes-contentious nature of bovine TB policy.

The Welsh Government 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.

You may wish to refine your request by narrowing its scope by being more specific about what information you particularly wish to obtain, including any dates or period relevant to the information required. If you do refine your request in this way, this will be treated as a new request.

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