

Dear

ATISN 27335 - Pandemic Influenza Vaccine

Thank you for your request to Welsh Government for information under the Freedom of Information Act (2000) received on 12 August 2026.

I interpreted your request as follows:

Information in relation to the decision taken on 27 July 2026 to extend an advance purchase agreement for the supply of a pandemic influenza vaccine:

1. **Decision documentation**
 - a. *The full decision paper, submission, business case or equivalent document presented to the Minister or other decision-maker.*
2. **Supporting advice and analysis**
 - a. *Substantive financial, legal, procurement, clinical, public health and risk assessments relied upon in reaching the decision.*
3. **Agreements**
 - a. *Copies of any agreement, variation, extension, participation agreement, memorandum of understanding or other contractual document governing Welsh Government participation in, or access to, the UK pandemic influenza vaccine advance purchase arrangement.*
 - b. *If participation is through UKHSA, DHSC or another UK Government body rather than directly with the manufacturer, provide the relevant agreement.*
4. **Financial commitments**
 - a. *The Welsh Government's actual or potential financial commitments under the arrangement, including:*
 - i. *extension costs;*
 - ii. *any annual or fixed payments;*
 - iii. *vaccine pricing (where held);*
 - iv. *obligations arising if the agreement is activated following a pandemic declaration.*
 - b. *Where costs depend on variables, please provide the relevant pricing mechanisms or contractual provisions.*
5. **Minimum and maximum commitments**
 - a. *Any legally binding minimum vaccine purchase commitment, including dose volumes and associated costs.*
 - b. *The maximum number of doses available to Wales and the maximum financial exposure of the Welsh Government.*
6. **Duration**
 - a. *The original term of Wales' participation, extension date and duration, any further extension options, and the current expiry date on which Wales' current commitment expires.*
7. **Procurement**
 - a. *Please confirm whether this relates to the UK-wide procurement for the Advance Purchase Agreement for Influenza Pandemic Specific Vaccines awarded to Seqirus UK Limited.*
 - b. *If so, provide records explaining:*
 - i. *Welsh Government involvement in the procurement;*

- ii. *assessment of the procurement outcome;*
 - iii. *the basis for selecting Seqirus; and*
 - iv. *the terms under which Wales accesses vaccine supply.*
- 8. **Alternative options considered**
 - a. *Any substantive analysis of alternatives, including non-participation, separate procurement, or alternative suppliers/arrangements.*
- 9. **Decision-making correspondence**
 - a. *Correspondence forming part of the decision-making process concerning the extension or financial/contractual terms of Wales' participation between Welsh Government officials and UKHSA, DHSC, Seqirus (or its representatives); and other UK devolved administrations.*

Our Response

The information requested relates to the extension of the UK-wide Advance Purchase Agreement (APA) for the supply of a pandemic-specific influenza vaccine. The procurement and associated commercial negotiations are being led by the UK Health Security Agency (UKHSA) on behalf of the four UK Administrations and remain ongoing.

We have consulted UKHSA regarding the potential impact of disclosure. UKHSA has advised that the negotiations remain at a commercially sensitive stage and that disclosure of information relating to the proposed arrangements would be likely to prejudice its ability to negotiate effectively and secure the best possible commercial outcome for participating administrations, including Welsh Government.

The information requested includes material relating to contractual arrangements, financial commitments, pricing structures, procurement considerations, risk allocation, options appraisals and correspondence concerning the extension of the APA. This information was supplied by UKHSA or generated in connection with the ongoing procurement and negotiations.

Disclosure at this stage would be likely to reveal the commercial positions, negotiating approaches, requirements and assumptions of the parties involved and would be likely to prejudice the commercial interests of UKHSA, Welsh Government and the supplier. We have therefore concluded that the information is exempt from disclosure under section 43(2) of the Freedom of Information Act 2000.

We have also considered whether any meaningful information could be disclosed in part. Given the extent to which the requested information is interconnected with live commercial negotiations, we do not consider that meaningful disclosure could be achieved through redaction without risking the prejudice identified above.

Section 43(2) is a qualified exemption, and we have considered the public interest in disclosure. We recognise the public interest in openness, transparency and accountability in relation to public expenditure, pandemic preparedness and government decision-making, particularly where arrangements exist to ensure the availability of vaccines in the event of a future pandemic. We also note that information relating to the existing Advance Purchase Agreement is already publicly available - [UKHSA Announces New UK-based Vaccine Deal](#).

The information requested, however, relates to negotiations concerning the extension of those arrangements and includes information that is not currently in the public domain. There is a stronger public interest in enabling UKHSA to negotiate effectively on behalf of the participating administrations and secure the best possible value for money for the taxpayer.

We have therefore concluded that, at this time, the balance of the public interest favours withholding the information under section 43(2) of the Freedom of Information Act 2000.

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,