5 November 2026

Dear

Information requested – Reference: ATISN 26-0174

Thank you for your request which I received on 3 November 2026. You asked for:

information relating to inshore fish and shellfish surveys and monitoring around Wales from 2010 onwards.

We have considered your request under the **Environmental Information Regulations 2004 (EIR)**, as the information requested constitutes environmental information for the purposes of the Regulations.

Our response

Regulation 12(4)(b): manifestly unreasonable request

Regulation 12(4)(b) of the EIR provides that a public authority may refuse to disclose information where a request is manifestly unreasonable. This exception can apply where the cost and burden of complying with a request would be disproportionate. It is subject to the public-interest test and the presumption in favour of disclosure.

We estimate that responding to your request in full, as presently framed, would require **in excess of 300 hours of staff and supplier resource**.

Your request covers a number of separate fisheries and marine monitoring programmes over approximately 16 years. It seeks information concerning:

- inshore, estuary and Water Framework Directive fish surveys;
- bass monitoring;
- lobster, crab and spider crab surveys;
- scallop surveys;
- Skomer Marine Conservation Zone fish and shellfish monitoring; and
- inherited sea fisheries committee byelaws concerning minimum fish sizes.

The information is not held by the Welsh Government as a single, readily accessible dataset. Relevant information is held across different systems and formats and, in some instances, within databases maintained by third-party suppliers or by other public authorities.

Responding to the request in its entirety would require substantial work to identify and locate relevant records, retrieve and extract the required fields from different datasets, reconcile information held in different formats, convert information where necessary into a readable format, and review the resulting material to establish whether it can lawfully be disclosed.

For some datasets, particularly historical monitoring data, extraction would also require significant work by third-party suppliers and would incur associated supplier costs.

Taking these factors together, we consider that the scale and complexity of the work required to respond to the request in full would place a disproportionate burden on the Welsh Government. We have therefore concluded that regulation 12(4)(b) is engaged.

Public-interest test

Regulation 12(4)(b) is subject to the public-interest test. We have therefore considered whether, in all the circumstances of the case, the public interest in maintaining the exception outweighs the public interest in disclosure. We have also taken account of the presumption in favour of disclosure under the EIR.

In favour of disclosure, we recognise that there is a significant general public interest in openness and transparency concerning environmental information held by public authorities.

There is also a public interest in increasing understanding of Wales's marine environment and in facilitating research into the distribution, abundance and seasonality of fish and shellfish species. Making environmental monitoring information more accessible can support wider scientific research and enable the reuse of environmental information for purposes beyond those for which it was originally collected.

We have also taken into account that you have indicated that exact vessel positions and personal information are not required, that information at an approximate 1 km resolution would be sufficient, and that aggregated information could be useful if the underlying data cannot readily be provided. These factors reduce some of the potential difficulties associated with disclosure.

In favour of maintaining the exception, however, the request in its present form encompasses multiple distinct monitoring programmes and approximately 16 years of information. The information has not been collected and maintained as a single dataset capable of straightforward extraction in the format requested. Compliance would consequently require substantial specialist staff time and third-party supplier resource to locate, retrieve, extract, reconcile, convert and review the relevant material.

We consider that diverting more than 300 hours of specialist staff and supplier resource to a single information request would have a significant impact on the resources available to deliver the Welsh Government's fisheries functions and other work. There is a public interest in ensuring that finite public resources, including specialist staff time and public funds, are used effectively to deliver those functions.

We have carefully balanced these considerations. While we acknowledge the genuine public interest in access to and reuse of marine environmental information, we

consider that this does not outweigh the substantial and disproportionate burden that responding to the request in its present form would impose.

We have therefore concluded that, on balance, the public interest in maintaining the exception under regulation 12(4)(b) outweighs the public interest in disclosure of the full body of information requested.

This conclusion relates to the **breadth and scale of the request as presently framed**, rather than to the purpose for which you propose to use the information.

Advice and assistance

We would be willing to assist you in refining the request to a scope that may be more manageable.

For example, you may wish to consider:

- restricting the request to a particular monitoring programme or survey;
- restricting it to one or a small number of species or species groups;
- reducing the period covered by the request;
- prioritising particular geographical areas;
- requesting information that is already held in an aggregated or readily extractable format; or
- identifying which of the requested datasets is of greatest importance to your research so that this can be considered as a separate request.

A substantially narrowed request would need to be considered on its own terms, but reducing the number of programmes, years, species or data fields may enable us to identify information that can be provided without imposing the burden associated with the present request.

Where relevant information is already publicly accessible, we can also direct you to the appropriate published source, the following links may be of interest.

Natural Resources Wales / Skomer Marine Conservation Zone

The Specified Crustaceans (Prohibition on Fishing, Landing, Sale and Carriage) (Wales) Order 2015

The Whelk Fishing (Wales) Order 2019

The Scallop (Amendment of Minimum Conservation Reference Sizes) (Wales) Regulations 2026

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