

Friday 21 November 2025

Dear

ATISN 26360 – Attending COP30

Information requested

Thank you for your request which I received on 11/11/2025. You asked for:

- Information regarding attendance of Welsh Government Representatives to COP30 in Brazil.
- Information about how many air miles would have been generated for travel to and from the event
- Information on the cost of accommodation, flights and other expenditure
- Information about how many representatives and the name of the Minister or title of staff members

Our response

A copy of the information I have decided to release is available below.

There were no Welsh Government attendees at COP30 in Belém.

However, one Welsh Government climate change official attended events co-hosted by the COP30 Presidency in the lead up to COP30 in Rio de Janeiro, Brazil.

We do not hold the information regarding the air miles of their associated travel.

The cost of accommodation was £298.45, the cost of return flights was £1,679.38, rail travel cost £105.85 and other expenses totalled £433.81.

I have decided that some of the information is exempt from disclosure Regulation 13 (1) Environmental Information Regulations and is therefore withheld due to it relating to personal information. The reasons for applying these exemptions are set out in full at Annex B to this letter.

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,

Annex B

Regulation 13 - Personal Data

Regulation 13 of the EIRs sets out an exception from the right to know if the information requested is personal information protected by the General Data Protection Regulation (GDPR) and Data Protection Act 2018 (DPA). Personal data is defined in the GDPR as:

“any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”

We have concluded that, in this instance, the information in relation to the job title of a junior Welsh Government official amounts to personal data.

Under Regulation 13 of the EIRs, personal data is exempt from release if disclosure would breach one of the data protection principles set out in Article 5 of the GDPR. We consider the principle being most relevant in this instance as being the first. This states that personal data must be:

“processed lawfully, fairly and in a transparent manner in relation to the data subject”

Guidance from the Information Commissioner's Office (Personal information (section 40 and regulation 13) v 1.3) states (at p11):

- The starting point is to consider whether it would be fair to the data subject to disclose their personal data. The key considerations in assessing this are set out in the section on Fairness below.
- If disclosure would not be fair, then the information is exempt from disclosure.

This approach was endorsed by the Court of Appeal in the case of *Deborah Clark v the Information Commissioner and East Hertfordshire District Council* where it was held:

“The first data protection principle entails a consideration of whether it would be fair to disclose the personal data in all the circumstances. The Commissioner determined that it would not be fair to disclose the requested information and thus the first data protection principle would be breached. There was no need in the present case therefore to consider whether any other Schedule 2 condition or conditions could be met because even if such conditions could be established, it would still not be possible to disclose the personal data without breaching the DPA” (paragraph 63).

In this instance, the personal data is the job title of a junior Welsh Government official, which has been redacted:

The Welsh Government official who attended COP30 is not a senior member of staff and would not expect their name or any other personal data to be released in this context. The official does not have an openly public facing role and therefore we believe that they would have no expectation that this information would be made public. We believe release of this information would be unfair and would breach the first data protection principle as the official would be easily identified by looking up the job title on the world wide web.

For those reasons, the information is being withheld under Regulation 13 of the EIRs. This is an absolute exemption and not subject to the public interest test.