

13 January 2026

Dear

## **ATISN 26411 – Request for Information**

### **Information requested**

Thank you for your request which I received on 24 November 2025. We apologise for the delay in responding. You asked for the following information relating to the Sustainable Farming Scheme (SFS) Roundtable, chaired by the Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs:

#### **1. Meetings**

- A full list of all dates on which the SFS Roundtable has met to date (and any scheduled future meeting dates if they exist).

#### **2. Agendas & Minutes**

- Copies of the agenda for each meeting.
- Copies of the minutes for each meeting.
- Where full minutes are not available, please provide any summaries, action notes, or equivalent records.

#### **3. Papers & Briefing Packs**

For each meeting, please provide:

- Any briefing papers, evidence packs, reports, presentations, or documents circulated to members in advance or during the meeting.
- Any internal Welsh Government briefing prepared **for ministers or officials** relating to the Roundtable meetings.

#### **4. Membership & Attendance**

- A list of all organisations and individuals invited to join the SFS Roundtable.
- Attendance lists for each meeting, noting who attended, who sent apologies, and who represented each organisation.

#### **5. Communications**

- Copies of email correspondence between Welsh Government officials/Ministers and Roundtable members relating to:
  - the organisation of meetings
  - the purpose, remit, or expected outputs of the Roundtable
  - any follow-up actions issued as a result of the meetings

### **Our response**

I have decided that some of the information is exempt from disclosure under regulation 12(4)(d) of the Environmental Information Regulations and is therefore withheld. The reasons for applying these exceptions are set out in full at Annex A to this letter.

A copy of the information I have decided to release is enclosed, as follows:

1. The list of meetings is enclosed. See attached annex B.
2. The agendas, meetings and minutes are withheld under EIR regulation 12(4)(d).
3. This information is withheld under EIR regulation 12(4)(d).
4. The list of organisations invited is in the public domain, most recently published here: [Sustainable Farming Scheme 2026: scheme description](#). Individual attendance lists, however, constitute material withheld under 12(4)(d) as for point 2 above.
5. The remit information is enclosed. See attached annex C. The remainder of the information is withheld under EIR regulation 12(4)(d).

### **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](mailto: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 A

### Application of exemptions/exceptions

The Freedom of information Act/Environmental Information Regulations provide a right for anyone to ask a public authority to make requested information available to the wider public. As the release of requested information is to the world, not just the requester, public authorities need to consider the effects of making the information freely available to everybody. Any personal interest the requester has for accessing the information cannot override those wider considerations.

I have decided to withhold the following information:

- The agendas, meetings and minutes, papers, briefing packs and communications, briefings for ministers and officials are withheld under EIR regulation 12(4)(d).

This Annex sets out the reasons for the engagement of regulations 12(4)(d) Environmental Information Regulations and our subsequent consideration of the Public Interest Test.

### **Engagement of regulation12(4)(d) (material in the course of completion) of the Environmental Information Regulations**

The Welsh Government believes that the information described above should be exempt from disclosure. The information pertains to a set of roundtable discussions that have occurred under strict closed circumstances to create a safe space in which a free and frank exchange of ideas may occur to drive the development of policy with a wide range of industry stakeholders prior to all final decisions being made by Welsh Ministers.

It is the nature of the advice received and the discussions occurring in this forum that ideas will be discussed that will contain errors and flaws, and alternative ideas that did not or will not form part of the finished work. In order to ensure that these ideas are brought to the table and considered, it is necessary that the space be protected from publishing incomplete ideas and information into the public domain, which would circumvent the intention of creating the closed forum in the first place.

Final versions of some elements of the work are now complete and available in the public domain here: [Sustainable Farming Scheme 2026: scheme description](#) and [Sustainable Farming Scheme: business case](#).

Other elements are still in ongoing development or are yet to be developed, and as such placing such information in the public domain at this stage will undermine any future partnership work with stakeholders, and risks placing incomplete, misleading, or incorrect information into the public domain. This would be likely to impact on trust in government information, cause confusion in comparison to final versions already or yet to be published, and would be likely to undermine ongoing policy development in collaboration with stakeholders.

## **Public Interest Test**

In order to satisfy the public interest test in relation to the exemption(s), it is necessary to conclude that the public interest arguments in favour of withholding the information are sufficient to *outweigh* the public interest arguments in favour of release.

### **Public interest arguments in favour of disclosure**

There is a clear public interest in understanding the policy itself, and there is also a public interest in understanding how input from those involved in the roundtable has impacted upon the policy development.

### **Public interest arguments in favour of withholding**

It is not in the public interest that disclosure of information that is incomplete, inconsistent or incorrect be placed in the public domain. Neither is it in the public interest that a policy process that is designed to have a closed roundtable phase as well as an open consultation phase be undermined by release of information that may or may not form part of the policy, and may be incomplete, incorrect or inconsistent.

### **Balance of public interest test**

Because parts of the policy are now complete and in the public domain, while other parts of the policy remain in development with discussions at a sensitive stage, where the policy making process is designed to create a suitable safe space for the development of the policy, the question of the balance of the public interest must take account of when this request was received.

At this stage the balance of public interest clearly falls in favour of protecting the process and withholding the information. The public interest in favour of release is a strong one, but not one that requires release now. Our intention is to publish remaining elements when the policy design is complete.