

05/02/2026

Dear

ATISN 26577, ATISN 26578, ATISN 26589, ATISN 26595 and ATISN 26618

Thank you for your requests relating to Community Energy Wales and associated delivery bodies.

Our response

In the first instance, I am of the view that the information your request relates to is environmental information and as such I have considered your request under the Environmental Information Regulations 2004 (EIRs). 'Environmental information' is defined in the Regulations as (inter alia) 'information on measures (including administrative measures), such as policies, legislation, plans, programmes, environmental agreements, and activities affecting or likely to affect the state of the elements of the environment, such as air and atmosphere, water, soil, land, landscape and natural sites, and also factors such as substances, energy, noise, radiation or waste likely to affect the state of the elements of the environment above'.

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."

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 projects in question and decisions made regarding this subject. The Welsh Government also recognises the public has an interest in how their money is to be, or has been, used to ensure Government gets the best value from the public purse.

A substantial volume of the information requested is stored on our Electronic Document and Records Management System, known as iShare, and within Outlook e-mail accounts for individual officials. iShare is the corporate repository for the

majority of information created and received by Welsh Government officials in the course of their duties that must be retained for business or historical purposes. Further information about iShare can be found under Section 7 of our Information and Records Management policy, which is available on the Welsh Government [website](#).

Documents are saved on iShare using naming conventions appropriate to the effective recording of information for our own purposes. Setting our systems in this way, and in line with our Records Management policy, enables effective delivery and will not necessarily lend themselves to being easily interrogated for generic requests for information. Where the Welsh Government believes providing such information would involve tasks that would be time consuming to deal with, in line with our obligations under the section 45 Code of Practice, we inform the requester of that fact and invite them to narrow down or re-focus their requests.

Due to the scope of your request, 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 which are already stretched and on balance, it is considered the public interest would be better served by not deploying our resources in these numerous requests but instead 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 a lot more specific about what information you particularly wish to obtain, including by reducing the number of requests relevant to the information required. If you do refine your request in this way, this will be treated as a new request.

To help refine your request regarding meetings and engagement, please see the published information which specifies Ministerial engagement and lists Ministerial meetings: [Ministerial meetings and engagements | GOV.WALES](#).

Please also note that several requests for information covered by this response include questions where we consider information has been provided in previous responses. For example, you have requested information about grants and other financial support given to Community Energy Wales and associated delivery bodies, and on compliance, monitoring and due diligence, along with evidence of Ministerial decisions, all of which have been shared in previous responses. Please refer to published responses for:

ATISN [25805](#)

ATISN [25184](#)

ATISN [25195](#)

ATISN [26279](#)

ATISN [26331](#)

ATISN [26346](#)

All published Freedom of Information responses can be viewed here: [Publications | GOV.WALES](#).

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: Freedomofinformation@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