

Dear

ATISN 27544 – Species reintroduction

Thank you for your request which I received on 21 September 2026, and your follow-up clarification, which I received on 1 October 2026. You asked for:

Recorded communications (internal and external) regarding species introductions between 2020 and 2026, and all records specifically relating to reintroduction of the White-Tailed Eagle.

You further clarified that you were particularly interested in reintroductions and licensing, and were interested in the following species:

Beaver, White-Tailed Eagle and Golden Eagle.

Our response

I have decided that this information is exempt from disclosure under regulation 12(4)(b) of the Environmental Information Regulations and is therefore withheld. The reasons for applying this exemption are set out below.

Regulation 12(4)(b) allows public authorities to refuse a request for information which is “manifestly unreasonable”. Guidance from the Information Commissioners Office (ICO) states that this exception can apply where cost of compliance with the request would be 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.”

In assessing whether the cost or burden of dealing with a request is “too great”, the ICO advises that public authorities need to consider the proportionality of the burden or costs involved and decide whether they are clearly or obviously unreasonable, for example the resources available to respond to the request, including the extent to which the public authority would be distracted from delivering other services.

You have requested a very large amount of documentation. For instance, you ask for “Recorded communications, meeting minutes, and written exchanges within the Welsh Government, and between the Welsh Government and external stakeholders, regarding [beaver, golden eagle and white-tailed eagle] reintroductions between 2020 and 2026.” You have added that you are “particularly interested in records on reintroductions and licensing.”

A search of our electronic records system has revealed the following numbers of documents which may be captured by the requested information:-

Beavers – 31,069 results

White-tailed eagles – 35,415 results

Golden eagles – 9,927 results

In total, there are 76,411 documents that would need to be reviewed to confirm whether they are captured. Although care has been taken to remove duplicate records when searching, the results may still contain some instances of duplication. Reviewing a document is a manual process. The document must be opened and read to see if it contains information in scope. Our sampling exercises show this takes approximately one minute per document. We thus estimate that this would constitute some 1,273 hours of work. This does not include time taken for preparation and redaction of materials found to be captured by the request, or preparation of the requested summary table, which would be considerable.

Unlike section 12 of the FoIA, Regulation 12(4)(b) is subject to the public interest test. The public interest in withholding this information includes the amount of work requested, which has a clear cost to the public purse, and also to the delivery of public policy. The nature of what has been requested requires that this request be handled by the relevant policy team. There are very significant calls on the work of the team. To carry out this request they would be required to cease their public tasks in this policy area. This would be to the detriment of public policy, which would clearly not be in the public interest.

Furthermore, in relation to the public interest test, it is determined that public interest in the information would be low. A review has been undertaken of Ministerial correspondence received since 2000 on the subject of these species. In that timeframe I have found just 22 separate items of correspondence which were either answered by officials, or received a letter from the relevant Welsh Minister.

In the absence of a strong countervailing public interest in responding to this request, we are of the view that the public interest favours withholding of this information. No public interest argument has been presented for the release of this information.

As there is no prevailing public interest in collating and releasing the information you request, I have decided not to provide you with this information.

You may wish to refine your request by narrowing its scope and being more specific about what information you particularly wish to obtain, including any dates or period of time relevant to the information required. You could start by identifying exactly what it is you wish to know/understand, and perhaps focus on a single species. If you do refine your request in this way, this will be treated as a new request. I would be happy to meet with you to discuss this further if that would be helpful.

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