

26 October 2026

Dear

**ATISN 27595 – Request for Information – SMART Flexible Innovation Support
Funding Award to Biofortuna Ltd (BeadBot™)**

Information requested

Thank you for your request which I received on 29 September 2026. You asked for:

1. The project title, project summary or description, and the SMART FIS strand under which the award was made.
2. The date of the grant offer and the approved project start and end dates.
3. The names of any subcontractors, suppliers, consultants, collaborators or knowledge-base partners named in the application, appraisal, grant offer letter or subsequent grant claims – in particular any organisation engaged to design, build, integrate or supply the BeadBot™ equipment or its components.
4. The approved breakdown of eligible project costs by category (for example staff costs, subcontracting or consultancy, capital equipment, materials) and the total grant awarded.

You also requested

“If you consider any part of this information exempt (for example under section 41 or section 43), please release the remainder with the exempt parts redacted and tell me which exemption applies to each item. If item 3 cannot be released in full, please at least confirm the number of third-party organisations involved, their type (e.g. private company, university, research centre) and their location (Wales, rest of UK, or overseas).”

Our response

A copy of the information I have decided to release is enclosed at Annex 1. This includes:

- The project title, project summary or description, and the SMART FIS strand under which the award was made.
- The date of the grant offer and the approved project start and end dates.

- Eligible costs relating to staff costs, overheads, materials and consumables, and capital equipment, together with the total SMART FIS grant awarded.

I have decided that some of the information is exempt from disclosure under section 43(2) (commercial interests) of the Freedom of Information Act 2000 and is therefore withheld. The reasons for applying this exemption, including the outcome of the public-interest test, are set out in Annex 2 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 2

Application of the exemption

The Welsh Government has decided to withhold the following information:

- The names, types, sectors and roles of the two third-party organisations involved in the project, including any organisation engaged to design, build, integrate or supply the BeadBot™ equipment or its components.
- The eligible project costs attributable to subcontracting or consultancy services, including any information that would enable those costs to be linked to an identifiable third-party organisation.

This Annex sets out the reasons why section 43(2) (commercial interests) of the Freedom of Information Act 2000 is engaged and the Welsh Government's subsequent consideration of the public-interest test.

The Welsh Government considers that disclosure of the names, types, sectors and roles of the two third-party organisations involved in the project would be likely to prejudice Biofortuna's commercial interests. When combined with other information already in the public domain, those details could enable the organisations to be identified and reveal commercially sensitive information about Biofortuna's procurement, resourcing and project-delivery arrangements.

Biofortuna has explained that disclosure of the withheld information could enable competitors to identify its technology sources and gain insight into its proprietary technology roadmap, ongoing areas of commercial innovation and project-delivery arrangements.

It has also confirmed that its arrangements with both third-party organisations were subject to confidentiality agreements, demonstrating that the parties took steps to protect information about their commercial relationships and technology-sourcing arrangements.

The Welsh Government has taken these representations into account as relevant supporting evidence but has not treated them, or the existence of the confidentiality agreements, as conclusive.

Having independently considered the withheld information, the information already in the public domain and the circumstances at the date of the request, the Welsh Government considers that disclosure would be likely to provide competitors and commercial partners with useful insight they would not otherwise possess into Biofortuna's development direction, external capabilities and procurement requirements.

This would be likely to weaken Biofortuna's competitive and negotiating position in future procurement and commercial activity. The Welsh Government is therefore satisfied that the identified prejudice is real, significant and causally linked to disclosure, rather than remote or speculative.

The Welsh Government also considers that disclosure of the eligible project costs attributable to subcontracting or consultancy services would be likely to cause commercial prejudice, particularly where those costs could be linked, directly or through other available information, to an identifiable third-party organisation and the services it supplied.

Public-interest test

Section 43(2) is a qualified exemption. The test must therefore balance transparency about the use of public funds against the real and significant commercial prejudice that could arise from linking the third-party organisations' identities, roles and associated project costs.

The Welsh Government has considered whether the public interest in disclosing the third-party organisations' identities, roles and associated project costs outweighs the public interest in maintaining the exemption. This assessment takes account of the information already in the public domain and the cumulative risk of jigsaw identification; it also distinguishes the withheld information from the limited aggregated information that can be released without identifying an organisation or attributing a financial value to its work.

Having considered the cumulative risk of jigsaw identification and the likely commercial consequences of linking the third-party organisations to the project-specific value of their work, the Welsh Government considers that disclosure would be likely to prejudice Biofortuna's commercial interests.

The linked identity-and-cost information was commercially sensitive at the date of the request. The Welsh Government is therefore satisfied that section 43(2) is engaged. As this is a qualified exemption, the Welsh Government has gone on to consider whether the public interest in maintaining the exemption outweighs the public interest in disclosure. This does not prevent the release of limited aggregated information that provides proportionate transparency without identifying a third-party organisation or attributing a financial value to its work.

Public-interest arguments in favour of disclosure

There is a clear public interest in openness and accountability concerning the use of public funds. Disclosure would provide further detail about how grant funding was used, support scrutiny of the eligible project costs and help the public understand the nature and scale of externally procured support.

This public interest is partly met by the information released in Annex 1 and by the following limited aggregated information:

The project involved two third-party organisations: one based in Wales and one based overseas. The organisations' names, types, sectors, specific roles and more precise locations are withheld because, individually or in combination with information already in the public domain, those details would be likely to enable identification of the organisations and expose the commercially sensitive relationship between the organisations, the services supplied and the associated project costs.

Public-interest arguments in favour of withholding

In maintaining the exemption, substantial weight has been given to the public interest in avoiding prejudice to Biofortuna's commercial interests.

For section 43(2) to apply, the prejudice must be real, actual or of substance, and there must be a causal link between disclosure and the identified harm. In this case, disclosure of the third-party organisations' identities, when combined with the project-specific value of their work, would reveal commercially useful information about Biofortuna's procurement and resourcing decisions, the value attributed to particular external expertise and the basis on which that expertise was obtained.

There is a likelihood, rather than a speculative possibility, that competitors could combine those details with information already in the public domain to infer Biofortuna's technical or regulatory requirements, reliance on external capability, stage of development and likely next steps.

Existing or prospective suppliers and commercial partners could also use the disclosed value as a benchmark in future negotiations. This would be likely to reduce Biofortuna's negotiating leverage and its ability to test the market and secure competitive terms, and could increase the cost of procuring comparable services. Disclosure would therefore be likely to place Biofortuna at a commercial disadvantage by giving counterparties and competitors information they would not otherwise possess.

The prejudice identified is therefore specific, foreseeable and causally connected to disclosure at the date of the request; it is not remote or hypothetical.

In the public-interest balance, there is significant weight in avoiding harm that would impair a grant recipient's ability to compete and negotiate effectively, particularly where the public interest in accountability for expenditure can be met to a substantial extent through disclosure of aggregated information that does not reveal the commercially sensitive link between the third-party organisations' identities and the value of their work.

Balance of the public-interest test

The public interest in transparency can be met to a meaningful extent through the information released in Annex 1 and by confirming the number and broad geographic distribution of the third-party organisations. Disclosure of their types, sectors, roles or more precise locations would add identifying detail and materially increase the risk of jigsaw identification when combined with other information already in the public domain.

That approach allows scrutiny of the use of public funding without providing the combination of details most capable of revealing Biofortuna's procurement, resourcing and project strategy.

Given the real and significant risk that disclosure of the third-party organisations' identities, roles and associated project costs would prejudice Biofortuna's competitive and negotiating position, the public interest in avoiding that harm outweighs the additional transparency that full disclosure would provide. The public-interest test therefore favours maintaining the exemption under section 43(2).