**2 November 2026**

Dear

**ATISN 26-0070**

Thank you for your request, which I received on **20 October 2026**.

Your request relates to Welsh Government Freedom of Information response **ATISN 27570 (Castell Howell)**, published in October 2026.

You requested:

**1.** The original request and covering correspondence relating to ATISN 27570 – Castell Howell

**Our response**

Please see the information we hold. Some information has been withheld under s40(2) of the freedom of Information Act, 2000. Full details of our application of this exemption is set out in Annex A

**From:** [Exempt s40(2)]
**Sent:** 25 September 2026 09:48
**To:** Freedom of Information Officer
**Subject:** Freedom of Information request – financial support to Castell Howell Foods Ltd

Dear Information Rights Unit,

Under the Freedom of Information Act 2000, please provide the following information for the period 1 March 2020 to 31 March 2022:

1. Every grant, loan or other financial support paid by the Welsh Government to Castell Howell Foods Ltd (or any company in its group), including payments under the Economic Resilience Fund. For each, please give the scheme name, date, amount and whether it was a grant or a loan.
2. Whether Castell Howell Foods Ltd received a loan under the Covid-19 Wales Business Loan Scheme or any other Development Bank of Wales fund, if the Welsh Government holds this.
3. The total amount paid by the Welsh Government to each local authority in lieu of centrally supplied shielding food boxes, by authority.
4. Any contract or agreement between the Welsh Government and Castell Howell Foods Ltd relating to the supply or distribution of food during the Covid-19 pandemic, with its value.

If any part of this request would exceed the cost limit, please tell me which parts can be answered within it, in line with your duty under section 16 to advise and assist.

I would prefer to receive the information electronically.

Yours faithfully,

[Exempt, s40(2)]

**Our Response**

**07/10/2026** FOI release 27570: Castell Howell Foods | GOV.WALES

**2.** All subsequent correspondence with the requester concerning the request

**From:** [Exempt, s40(2)]
**Sent:** 08 October 2026 18:31
**To:** [Exempt, s40(2) LGHRRS - Food
**Subject:** Re: ATISN 27570 – FOI Request – Castell Howell

Dear [Exempt, s40(2)],

Thank you for your reply to my request, ATISN 27570. Before I decide whether to ask for an internal review, there are a few points I'd be grateful if you could clear up.

First, the list under question 1 goes A, B, C and then E, with no D. Has an item been left out or withheld? If it has been withheld, could you tell me which exemption you've relied on?

Second, my request asked for the scheme name for each payment and whether it was a grant or a loan, but the reply only says "COVID fund" or "COVID funds". Could you give me the scheme behind each payment and confirm which were grants and which were loans? Two of the figures are also rounded (£520K and £87K), so I'd appreciate the exact amounts.

Third, which parts of the Welsh Government were searched? I'm thinking in particular of Economic Resilience Fund payments made through Business Wales, which I suspect wouldn't sit with the food team.

I see this as clarifying my original request rather than making a new one, so a short reply covering the three points would be fine.

Kind regards,

[Exempt, s40(2)]

**ATISN 27570 – Further Clarification**

**From:** [Exempt, s40(2)]
**Sent:** 26 October 2026 12:05
**To:** [Exempt, s40(2) LGHRRS - Food
**Subject:** Re: ATISN 27570 – Response to follow up questions

Dear [Exempt, s40(2)],

Thank you for your email seeking clarification of our response, received 08/10/2026.

Following receipt of your clarification request, we undertook further searches of Welsh Government records relating to financial support provided to companies within the Castell Howell Foods group during the period **1 March 2020 to 31 March 2022**. As a result of these additional searches, we identified further grant payments that fall within the scope of your request, and which were not included in our original response. We apologise for this omission.

**A. Missing item in the original response**

The omission of item D from the original response was a drafting error. No information was withheld and no exemption was applied. Further searches have now been completed and all information identified as falling within the scope of your request is set out below.

**B. Scheme name, type of support and amounts Grants Awarded**

Further searches have now been completed, and we can confirm that the grants listed below represent all grant payments identified within the scope of your request for the period specified. The amounts shown are the actual amounts paid and recorded in Welsh Government systems. They have not been rounded and are reported to the nearest pound.

*Economic Resilience Fund – ERF
*Small Medium Enterprise – SME

**Castell Howell Foods Ltd**

- ERF Non-*SME - 1 July 2020 - **£522,000**
- ERF Sector Specific 1 - 9 March 2021 - **£150,000**
- ERF Sector Specific 2 - 6 April 2021 - **£250,000**

**Celtica Foods Ltd**

- ERF SME - 25 June 2020 - **£87,000**
- ERF Sector Specific 1 - 12 February 2021 - **£65,337**

**Farm Fresh**

- ERF SME - 1 July 2020 - **£51,000**
- ERF Sector Specific 1 - 29 January 2021 - **£58,361**

**Upton (Farm Frozen Foods)**

- ERF SME - 19 May 2020 - **£37,500**
- ERF Sector Specific 1 - 11 February 2021 - **£24,000**
- ERF Sector Specific 2 - 12 April 2021 - **£23,900**

We can confirm that all payments listed above were provided as **grant funding and not loans**. We can also confirm that these represent the final amounts paid to the recipients identified and that no further grant payments have been identified through our searches for the period covered by your request.

**C. Searches Undertaken**

Relevant information was identified through searches of Welsh Government financial and business support records. Additional searches were undertaken following receipt of your clarification request, resulting in the identification of the grant payments listed above

**D. Economic Resilience Fund**

The grants detailed above were awarded through the Economic Resilience Fund (ERF), including ERF Small Medium Enterprise (SME), ERF Non-SME and ERF Sector Specific funding rounds.

I trust this clarifies the position.

Yours sincerely,

[Exempt, s40(2)]

Food Division
Welsh Government

**3. Any information held identifying a company, organisation, media outlet or other third party on whose behalf the request was submitted**

I can confirm that the Welsh Government does not hold information that identifies the requestor's company, organisation, media outlet or third party on whose behalf the request was submitted.

**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:

**Information Rights Unit**
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

E-mail: **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

Website: **www.ico.org.uk**

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

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:

**Freedom of Information Act 2000: Section 40(2)**

Section 40(2) together with the conditions in section 40(3)(a)(i) or 40(3)(b) provides an absolute exemption if disclosure of the personal data would breach any of the data protection principles.

'Personal data' is defined in sections 3(2) and (3) of the Data Protection Act 1998 ('the DPA 2018') and means any information relating to an identified or identifiable living individual. An identifiable living individual 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 the individual.

We have concluded that, in this instance, the information requested contains third party personal data.

Under Section 40(2) of the FOIA, 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"*
The lawful basis that is most relevant in relation to a request for information under the FOIA is Article 6(1)(f). This states:
*"processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child".*
In considering the application of Article 6(1)(f) in the context of a request for information under FOIA it is necessary to consider the following three-part test:-

- **The Legitimate interest test**: Whether a legitimate interest is being pursued in the request for information;
- **The Necessity test**: Whether disclosure of the information/confirmation or denial that it is held is necessary to meet the legitimate interest in question;
- **The Balancing test**: Whether the above interests override the interests, fundamental rights and freedoms of the data subject.

Our consideration of these tests is set out below:

## 1. Legitimate interests

The Welsh Government recognises there is a legitimate interest in being able to identify individuals involved in any discussions (to help understand the reason for their involvement).
The Welsh Government cannot identify any other legitimate interest in you or the public receiving the personal data captured by your request.

## 2. Is disclosure necessary?

The Welsh Government is of the view that it is not necessary to disclose the personal information caught by your request. The substance of the information requested, and our response to those requests, can be fully understood without identifying the individuals concerned.

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## 3. The balance between legitimate interests and the data subject's interests or fundamental rights and freedoms

As it has been concluded it is not necessary to disclose the personal information caught by the request, there is no requirement to balance the rights and interests of those individuals against the rights, under FOIA, of the requester. To conclude, as release of the information would not be legitimate under Article 6(1)(f), and as no other condition of Article 6 is deemed to apply, release of the information would not be lawful within the meaning of the first data protection principle. It has therefore been withheld under section 40 of the Freedom of Information Act. Section 40 is an absolute exemption and not subject to the public interest test.