

Edward Jones
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Our ref: NR176210
Date: 31 July 2020

Dear Mr Jones,

Freedom of Information Act 2000 ("FOIA") Request

I write in response to your request dated 24 June 2020 made to the Environment Agency Pension Fund (EAPF) under the FOIA. We apologise for the length of time it has taken to respond to your request.

We have considered your request under the provisions of the Freedom of Information Act 2000 / Environmental Information Regulations 2004 (EIR). The Act requires that we respond to requests by advising you whether or not information is held, and if so by providing you with that information.

EIR Regulation 3(2) states that information is held if it is in our possession and has been produced or received by us, or it is held by another person on our behalf at the time the request is received.

You require 'The full details of what the Environment Agency Pension Fund currently invests in, including the name and amounts of each asset class or investment being held.' and further breakdown.

Full details of our holdings in Excel format are available on our website [here](#). These are due to be updated to holdings as of 31 March 2020 by August. I hope that this gives you the detail you require but please do come back if this is not the case.

On the [EAPF website](#) you will also find our latest annual report and financial statements, as well as a range of material describing our approach to responsible investment.

Please note that our permission for you to use this information is subject to you complying at all times with the terms of the Open Government Licence, which can be accessed here: <http://www.nationalarchives.gov.uk/doc/open-government-licence/version/3/>.

Information not held

In this case, some of the information you have requested is not held by the Environment Agency, and we are therefore refusing this aspect your request on the grounds that there is no information we can provide.

The third point of your request asks for:

"3) The industrial sector of each investment e.g. Aerospace & Defense, Oil & Gas Producers, Pharmaceuticals & Biotechnology, Media, Banks, Mining, Government, Automobiles, Financial Services, Housing and any other sectors that the Pension Fund holds investments in. Examples of Pension Funds which have previously included this data in their publicly released investments include Buckinghamshire and Derbyshire. (i)"

The Environment Agency does not hold one unified source of data for this information and does not hold one classification of industry sector. Therefore we are not able to provide you with this data. We

are in the process of testing a product to enable us to publish this information in the future as part of our holdings data.

Where a request is for environmental information, the Regulations allow us to refuse to disclose it if the exception at EIR Regulation 12(4)(a) applies. The regulation states that a public authority may refuse to disclose environmental information to the extent that it does not hold that information when an applicant's request is received.

It is not possible for us to conduct a public interest balancing test because the reason for non-disclosure is that the information is not held.

We trust that the above clearly sets out the EAPF's position with regards to your request. Please do not hesitate to contact me if you have any questions. Likewise if you are not satisfied you can contact us within 2 calendar months to ask for our decision to be reviewed. We shall review our response to your request and give you our decision in writing within 40 working days.

If you are still not satisfied following this, you can raise a concern with the Information Commissioner, who is the statutory regulator for Freedom of Information and the Environmental Information Regulations. The contact details are:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 0303 123 1113
Website: <http://ico.org.uk>

Yours sincerely,

Environment Agency Pension Fund