



Department for Business, Energy & Industrial Strategy

Science & Innovation for Climate &
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Department for Business, Energy &
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Our ref : EIR2021/19571

31 August 2021

Dear Geoff Beacon,

Thank you for your email of 6th August where you requested the following information:

Thank you for your reply of 5h August 2021, which says requests EIR2021/11713 and EIR2021/11710 both exceed the cost limits for FOI requests. Please accept the following FOI request:

Searching backwards from 1st April 2021 please supply documents written by the Department for Business, Energy and Industrial Strategy, which mention GWP*, until 80% of the cost limit on FOI requests is reached.

Your requests have been considered under the Environmental Information Regulations 2004 ('the EIRs') on the basis that the information you have asked for falls within the definition of 'environmental information' in the EIRs.

The Department wishes to be as open as possible in answering requests, and to help people obtain the information they are looking for. Unfortunately, in this case to determine whether the Department holds the information you requested and to locate, retrieve and extract the information would require a substantial volume of work. It is unfortunately not possible, as you have requested, to search for documents until 80% of the cost limit of FOI requests is reached.

This is because the terms in your request are very broad. We would need to search across many teams to identify all items in scope of your request and this would be a manifestly unreasonable burden on the Department. The Information Commissioner's Office guidance confirms that the costs of considering if information is exempt can be taken into account as relevant arguments under EIR Regulation 12(4)(b).

After careful examination of your request under the EIRs, we have determined that Regulation 12(4)(b) would apply. Regulation 12(4)(b) states that a public authority may refuse to disclose information to the extent that the request for information is manifestly unreasonable.

In applying the exception, we have considered the public interest test in respect of your requests. We have applied a presumption in favour of disclosure as required by Regulation 12(2). We acknowledge that there is a public interest in the information you have requested. Greater transparency makes Government more accountable to the electorate and increases trust and also enables the public contribution to policy making to become more effective. However, your requests are too broad. Gathering the information you have requested would involve a significant cost and diversion of resources from the teams concerned and the Department's other work. Therefore, we will not process your requests as currently drafted.

Specifically, it is impossible to search for GWP* on our system as the asterisk acts as a 'wild card' in the search functionality. For example when searching for documents on GWP on the system between 01/01/2019 and 04/05/2021 there were 8673 hits in 102 locations across the department. It is impossible to know which refer to "GWP*" without manually going through each hit.

We understand your interest in this important subject, as one of many approaches to comparing the climate impact of different greenhouse gases, the Department of Business Energy and Industrial Strategy has a research interest in GWP* and what it can tell us about the effect of different pollutants on the atmosphere. GWP100 is the agreed common metric used for reporting Greenhouse gas emissions internationally, and consequently for the UK's Carbon Budgets, and is consistent with the analysis underpinning both regimes. On the basis of existing agreements and the available evidence we are not currently considering adoption of alternative metrics, such as GWP*, for our national emissions reporting or accounting processes. Given the nature of your requests, you may wish to refine it by narrowing its scope and being more specific concerning the precise nature of the information you wish to obtain. You may consider reducing the scope of your request. This will help us determine whether we are able to locate and provide all the relevant information.

If you are dissatisfied with the handling of your request, you have the right to ask for an internal review. Internal review requests should be submitted within two months of the date of receipt of the response to your original request and should be addressed to the Information Rights & Records Unit. It would be helpful if you can tell us why you are dissatisfied with the response to your request so we may address this during the internal review.

Information Rights & Records Unit
Department for Business, Energy and Industrial Strategy
1 Victoria Street
London
SW1H 0ET
Email: FOI.Requests@beis.gov.uk

Please remember to quote the reference number above in any future communications.

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. Complaints can be made to the Information Commissioner via their website at: <https://ico.org.uk/make-a-complaint/official-information-concerns-report/official-information-concern/>.

Yours sincerely,

Science and Innovation for Climate & Energy