

Ref: EIR2026-046

22 July 2026

Dear [REDACTED]

We refer to your request for the following information received on July 10<sup>th</sup> 2026:

*"I am writing to make a new request for environmental information under the Environmental Information Regulations 2004 ("the EIR").*

*For the avoidance of doubt, I am not the individual who submitted request EIR2025-038 or the subsequent request for an internal review. I have no association with that requester or their correspondence. I recently came across the published internal review outcome and the accompanying explanatory note online, and having read those documents with interest, I noted that they disclose a considerable amount of information about the existence, discovery and handling of a draft report entitled Review of environmental monitoring data for Christmas Island (CI) 1957–1958.*

*My request arises solely from the information contained within that published internal review. I am not seeking to reopen the previous request, nor am I asking AWE to reconsider its earlier decisions or to disclose the same draft report again. Rather, the published review itself appears to identify a number of additional administrative, records management and document lifecycle records which were not themselves the subject of the original request but which may now exist as identifiable recorded information.*

*I would therefore be grateful if AWE could consider this as a new and separate request.*

*Where any part of the requested information is considered exempt or subject to an exception, I respectfully request that each item be considered independently, that any reasonably severable information be disclosed where possible, and that partial disclosure with appropriate redactions be considered rather than withholding entire documents.*

#### **1. Searches Undertaken**

*Please provide the recorded information describing the searches undertaken in response to the original request and the subsequent internal review.*

*In particular, please provide any records identifying:*

- the electronic systems, databases, repositories or document management systems searched;*
- whether SharePoint, Merlin, the Corporate Memory Archive, network drives, personal drives, archived storage, email systems or any other repositories were searched;*
- the dates on which searches were conducted;*
- the search terms used;*

- the individuals, teams or business units asked to conduct searches;
- the scope of those searches;
- any documented search strategy;
- records explaining why the draft document was not located during the original search but was subsequently identified during the internal review; and
- any records explaining what additional searches or enquiries resulted in the draft being located.

## 2. Metadata Relating to the Draft Report

*Please provide the recorded metadata for every version of the document entitled Review of environmental monitoring data for Christmas Island (CI) 1957–1958, including where available:*

- document title;
- file name(s);
- document reference numbers;
- document identifiers;
- version numbers;
- revision numbers;
- draft numbers;
- creation dates;
- modification dates;
- last accessed dates;
- publication dates (if applicable);
- document status (draft, review, final, superseded, archived, withdrawn etc.);
- author(s);
- contributors;
- reviewers;
- approvers;
- document owner;
- business area responsible;
- document classification;
- security classification history;
- file size;
- document format;
- storage location(s);
- SharePoint metadata;
- Merlin identifiers;
- audit logs;
- version history;
- revision history;
- change logs;
- tracked changes metadata;
- comments metadata;
- approval workflow metadata;
- records management identifiers;
- retention metadata;
- archive identifiers; and

*- any other metadata routinely associated with the document.*

*If the document originated as a Microsoft Office document before conversion to PDF, I also request any recorded metadata associated with the native document where held.*

### **3. Explanation of the Metadata**

*In addition to the metadata itself, please provide any recorded information explaining what the metadata demonstrates regarding the development of the report.*

*In particular, please identify:*

- how many draft versions existed;*
- which version AWE considers to be the "last version" referred to in the internal review;*
- whether earlier drafts still exist;*
- whether intermediate drafts were deleted or superseded;*
- whether any draft was ever designated as a final version;*
- whether any version underwent formal review or approval;*
- whether tracked changes or reviewer comments were incorporated; and*
- whether any version history or audit trail exists explaining the evolution of the document.*

### **4. Version History**

*Please provide any recorded information identifying:*

- every draft version of the report;*
- version comparison reports;*
- tracked changes;*
- reviewer comments;*
- editing comments;*
- revision summaries;*
- document comparison records;*
- review copies; and*
- records explaining the differences between successive versions.*

*If disclosure of the draft versions themselves is considered exempt, I request the version history and associated administrative records identifying their existence.*

### **5. Document Lifecycle**

*The published internal review states that the report was never finalised and was not formally issued or filed as a formal record.*

*Please provide any recorded information explaining:*

- when work on the report commenced;*
- whether the work was formally commissioned;*

- *who commissioned it;*
- *the purpose for which it was prepared;*
- *whether terms of reference existed;*
- *who authorised the work;*
- *who managed the project;*
- *who supervised the authors;*
- *whether progress meetings were held;*
- *whether review meetings were held;*
- *whether completion dates were set;*
- *when work ceased;*
- *why work ceased;*
- *why the report was never finalised;*
- *who decided not to finalise it;*
- *whether any recommendation was made not to complete or publish it;*
- *whether the report was superseded by another document;*
- *whether it remains an active record; and*
- *why it was not incorporated into AWE's formal record system.*

## **6. Records Management**

*Please provide recorded information concerning the records management of the report, including:*

- *records management policies applicable to draft technical reports;*
- *retention schedules;*
- *disposal schedules;*
- *archive policies;*
- *records explaining why no formal record copy existed;*
- *whether any versions have been destroyed;*
- *destruction logs;*
- *destruction certificates;*
- *disposal authorities;*
- *archive transfer records; and*
- *any audit records relating to the management of the report.*

## **7. Communication with the Ministry of Defence**

*The explanatory note indicates that AWE understands that the draft was shared with the Ministry of Defence.*

*Please provide any recorded information relating to that transmission, including:*

- *covering emails;*
- *covering letters;*
- *correspondence;*
- *meeting minutes;*
- *comments received from the Ministry of Defence;*
- *requests for amendments;*

- requests for clarification;
- review comments;
- internal discussions regarding MOD feedback; and
- records identifying when and how the document was transmitted.

#### 8. Related Records

*The published draft refers to numerous Merlin references and other internal records.*

*Rather than requesting the documents themselves at this stage, I request a schedule identifying the records referenced within the report, including:*

- Merlin reference number;
- document title;
- date;
- current status;
- whether the record remains held;
- whether it is archived; and
- whether it forms part of the Corporate Memory Archive or another repository.

#### 9. Records Concerning the Internal Review

*Please provide recorded information concerning the conduct of the internal review itself, including:*

- internal review submissions;
- review notes;
- recommendations;
- internal memoranda;
- review meeting notes;
- communications between reviewers;
- records explaining why the original conclusion changed;
- records explaining why disclosure of the draft was ultimately considered appropriate notwithstanding the reliance upon Regulation 12(4)(d); and
- any guidance or policies relied upon during the internal review."

We have considered your request under the Environmental Information Regulations 2004 (EIR).

A public authority may refuse a request under Regulation 12(4)(b) where it is manifestly unreasonable. Having carefully considered your request, AWE has concluded that Regulation 12(4)(b) applies.

Whilst we acknowledge that the request is framed as a new request, it concerns the same underlying subject matter as EIR2025-038 and the subsequent internal review, namely the draft document entitled *Review of environmental monitoring data for Christmas Island (CI) 1957-1958* and the circumstances surrounding its identification, management, review and disclosure.

Your request comprises nine substantial categories containing numerous individual elements. Collectively, these seek information concerning:

- searches undertaken in response to the original request and internal review;
- metadata relating to all versions of the draft report;
- explanations of metadata and document development;
- version histories, tracked changes and audit trails;
- document lifecycle and governance records;
- records management and disposal records;
- communications with the Ministry of Defence;
- schedules of records referenced within the report; and
- records relating to the conduct of the internal review.

To determine what information is held and whether it can be disclosed, AWE would be required to undertake extensive searches across multiple current and historic repositories, including document management systems, archived records, email systems, records management systems and business unit holdings.

Any information located would then require detailed examination to:

- identify whether it constitutes environmental information;
- separate environmental and non-environmental content where necessary;
- assess the applicability of a range of EIR exceptions;
- consider third-party interests;
- review personal data contained within records;
- assess potentially sensitive information relating to government, defence, security, scientific and technical activities; and
- consider redactions on a document-by-document basis.

Much of the information sought consists of administrative records, audit trails, metadata, version histories, search records and communications within AWE and between AWE and the MoD generated over an extended period and across multiple business areas.

The exercise required to identify, retrieve, review and assess all potentially relevant information would impose a grossly disproportionate burden on AWE.

The Commissioner has recognised that Regulation 12(4)(b) may apply where the burden of complying with a request would be substantial and disproportionate when considered in the context of the request as a whole.

We therefore consider the request to be manifestly unreasonable and that Regulation 12(4)(b) is engaged.

Regulation 12(4)(b) is subject to the public interest test.

We recognise the public interest in transparency concerning environmental information, the management of historical environmental records, and the decision-making processes associated with previous requests. Disclosure of environmental information supports openness, accountability and public understanding of matters relating to environmental monitoring.

However, there is also a significant public interest in protecting public authorities from disproportionate burdens that would divert finite resources from their core functions. Your request seeks an exceptionally broad range of information extending well beyond the environmental information discussed within the previous request and encompasses extensive administrative, governance, records management and review material. Compliance would require substantial searches and detailed review work across numerous systems.

We consider that the public interest in maintaining the exception outweighs the public interest in disclosure. Accordingly, AWE is refusing the request under Regulation 12(4)(b) of the EIR.

In accordance with Regulation 9, (Duty to Provide Advice and Assistance), we have considered whether the request could be refined into a more manageable form.

Should you wish to submit a fresh request, you may find it helpful to limit the scope to a specific category of information. For example:

- metadata associated with a specific identified version of the report.

A more targeted request may enable AWE to consider the information sought without the disproportionate burden created by the current request.

However, we must advise you that as the documents in question are over 12 years old, we anticipate that Regulation 12(4)(a) (information not held) will be applicable for several parts of your request

AWE's position is that it does not hold many of the categories sought (for example, formal version histories, destruction certificates, project management records, approval workflows, review meeting notes, audit logs, etc.).

You have also requested extensive metadata, search records, audit records and administrative information concerning the handling of the original request and internal review.

To the extent that if such information exists, much of it relates to the administration of information requests rather than environmental information itself.

Having reviewed the request, AWE does not hold additional environmental information of the nature and extent described within your request beyond that already identified during the handling of the original request and internal review.

For the avoidance of doubt, the published internal review established:

- that draft versions of the report were located;
- that the report had not been finalised;
- that it had not been formally issued as a finished report; and
- that the latest version of the draft was subsequently disclosed.

The internal review did not identify the existence of the extensive range of supporting records, metadata repositories, or lifecycle records described within your request.

AWE does not accept that the publication of the internal review gives rise to a reasonable basis for concluding that such information must exist or must be held.

Please remember to quote the reference number above in any future communications. If you have any queries regarding the content of this letter, please contact this office in the first instance.

If you are unhappy with the way your request has been handled you have a right to request an internal review within 40 days of receiving this letter, by writing to [information.requests@awe.co.uk](mailto:information.requests@awe.co.uk) or our postal address: Information Requests Team, AWE Aldermaston, Reading, RG7 4PR. If you are still unhappy after an internal review has been completed, under the provisions of Section 50 of the Freedom of Information Act 2000 you have the right to take your complaint to the Information Commissioner's Office. Please note the Commissioner will generally not consider a complaint until you have exhausted AWE's internal complaints process.

Yours sincerely,

AWE Information Requests Team