



**Decision of the Commissioner for Environmental Information
on an appeal made under article 12(5) of the European Communities
(Access to Information on the Environment) Regulations 2007 to 2018
(the AIE Regulations)**

Case: OCE-120546-L8F1K3, OCE-120551-L1C4T3, OCE-120552-N3B3F4, OCE-120553-K2P8N2, OCE-120559-S8Q1J5, OCE-120560-D9V5Q6, OCE-120561-Z5T1D9, OCE-120562-Z4D2N5, OCE-120563-C1G6J0, OCE-120568-P6Z6K4, OCE-120570-X3B8S0, OCE-120571-Q8Q2B4, OCE-120576-C9K5Y8, OCE-120577-M2G0Z0, OCE-120579-D7F0Z1, OCE-120580-P9G4W1, OCE-120581-L7J0K4, OCE-120582-V3X5B8, OCE-120583-G5D3T5

Date of decision: 27 July 2022

Appellant: Ms. X

Public Authority: Coillte

Issue: Whether Coillte was justified, under article 9(2)(a) of the AIE Regulations, in refusing access to information coming within the scope of 19 requests submitted by the appellant.

Summary of Commissioner's Decision: The Commissioner annulled Coillte's decision. He directed Coillte to undertake a fresh decision making process in respect of each of the 19 requests.

Right of Appeal: A party to this appeal or any other person affected by this decision may appeal to the High Court on a point of law from the decision, as set out in article 13 of the AIE Regulations. Such an appeal must be initiated not later than two months after notice of the decision was given to the person bringing the appeal.



Background

1. This case has its background in 19 separate communications submitted by the appellant to Coillte seeking access to information under the AIE Regulations. The details of the 19 requests and the reference numbers used by this Office, the appellant, and Coillte are set out in Appendix 1. For the purposes of this decision I will refer to the 19 requests as Requests 1-19. The 19 requests were submitted between 26 November 2021 and 8 January 2022, as follows:
 - 26 November 2021 – Requests 1 and 2 (two requests)
 - 30 November 2021 – Requests 3 and 4 (two requests)
 - 7 December 2021 – Requests 5, 6, 7, 8, 9, 10, 11, 12, and 13 (nine requests)
 - 9 December 2021 – Request 14 (one request) submitted
 - 16 December 2021 – Requests 15, 16, 17, and 18 (four requests)
 - 8 January 2021 – Request 19 (one request)
2. On 16 December 2021, Coillte sent separate emails to the appellant regarding six of the requests (Requests 3, 4, 6, 7, 12, and 14), informing her that, due to the complexity of the information requested, it required an extension in accordance with article 7(2)(b) of the AIE Regulations in order to make its decision. It specified that responses would issue not later than 29 January 2022 (Requests 3 and 4), 6 February 2022 (Requests 6, 7, 12), and 8 February 2022 (Request 14).
3. On 21 December 2021, Coillte wrote to the appellant, noting that she had made 23 separate requests between 17 November 2021 and 16 December 2021. Coillte explained that it had responded to three of those requests; however, regarding the remainder of the requests, it noted that “[i]t is not reasonable or possible for Coillte to entertain and process all these requests, even within the extended period of two months allowed for in cases of manageable but voluminous cases seeking a complex range of information. This is so, both generally and particularly at the present time, where dealing with the requests would also cause considerable difficulty for affected staff given year-end objectives/deadlines, as well as Christmas leave.” Coillte referred to article 9(2)(a) of the AIE Regulations, which provides that a public authority may refuse to make environmental information available where the request is manifestly unreasonable having regard to the volume or range of information sought. It indicated that it was of the view that the remainder of the requests would be refused on that basis and, accordingly, it was proposing to assist the appellant in avoiding a refusal by suggesting that she refine the aggregate scope of her remaining requests.
4. The appellant responded on the same day, indicating her position that Coillte should not conflate her individual requests and refining Request 1 (limiting it to the information sought at part 1) and Request 2 (limiting it to the information sought at parts 1 and 2). The appellant informed this Office that on 27 December 2021 that she notified Coillte that she did not wish to reformulate her other requests, however she was agreeable to a one month extension in respect of them.
5. On 13 January 2022, Coillte issued its original decision, noting that it was in respect of 21 requests submitted by the appellant, including Requests 1 to 19 (although it stated that Request 2 had not been refined and included incorrect dates for Request 1, 2 and 14). Coillte refused access to all of the information sought in full under article 9(2)(a) of the AIE Regulations. On 21 January 2022, the appellant sought an internal review and made submissions in respect of each of the requests. In doing so, she asked that each request be considered on its own merits and not in combination.



6. On 18 February 2022, Coillte issued its internal review decision, affirming its original decision under article 9(2)(a) of the AIE Regulations in respect of all 21 requests concerned. The general thrust of its position was that, due to the cumulative nature of the requests, the overall time and resources required to comply would impose a heavy burden on Coillte and unreasonably and disproportionately divert it from and disrupt it in performing its core functions, including its commercial activities. In support of its position, Coillte made a number of comments, including those summarised below:

- Coillte explained that the requests had been refused “due to their cumulatively unreasonable voluminousness and range.” It stated that the fact that so many requests were submitted within a short period of time increased the administrative burden on Coillte in responding to the requests within the timeframes specified in the AIE Regulations. It noted that if the requests had been staggered and spaced out to a greater degree, this may have facilitated Coillte in responding to the requests.
- Coillte stated that it would take over 125 hours to locate, identify and copy relevant records and involve approximately 12 members of staff across at least ten divisions. It indicated that while it may take less time to comply with some of the requests, others would take over 30 hours. It also indicated that the total estimate did not include the estimated time required for several very complex requests, which would take at least 14 hours each. It further stated that to gather the information relevant to the request dated 8 January 2022, would take a number of days.
- Coillte stated that while article 7(2)(b) of the AIE Regulations allows public authorities to extend the timeframe for response to two months due to the volume or complexity of the information requested. It pointed out that there is no provision to extend the timeframe further. It contended that the resources required to comply with the requests, ten of which were received on one day, would place an extraordinarily heavy burden on Coillte.
- Coillte outlined its understanding that the appellant had reformulated only three of the requests and noted its view that this did not have a significant and/or sufficient impact on the volume and range of information sought or the burden and cost, which it considered to be disproportionate. It outlined that the task required to be carried out to comply with the requests remained complex and voluminous.
- Coillte stated that it did not consider the information sought to be of a kind which one would expect to be organised by Coillte in a manner that enables its easy dissemination. It noted that this is because the requests “are particularly bespoke, and it requires an unrealistic level of prescience and/or specificity for Coillte to identify and disseminate same as a matter of course.”
- Coillte stated that it had considered whether the public interest in disclosure of the information outweighed the interest served by refusal. It outlined that it considered that public interests served by disclosure would be openness and transparency and by refusal would be avoiding the necessity to divert staff away from their normal activities, thereby causing substantial and unreasonable disruption to that work, and the efficient and effective performance of Coillte.



7. On 9 March 2022, the appellant submitted, and paid the required fees for, 19 separate appeals to my Office in respect of Requests 1 to 19. On 15 March 2022, she made further submissions on each separate appeal. In doing so, she included her view that the AIE Regulations do not allow for the aggregation of separate and unrelated requests for the purposes of determining refusal under article 9(2)(a) and her position on Coillte's duties under article 5 of the AIE Regulations.
8. I have now completed my review under article 12(5) of the Regulations. In carrying out my review, I have had regard to the correspondence between Coillte and the appellant as outlined above and to correspondence between my Office and both Coillte and the appellant on the matter. In addition, I have had regard to:
 - the Guidance document provided by the Minister for the Environment, Community and Local Government on the implementation of the AIE Regulations (the Minister's Guidance);
 - Directive 2003/4/EC (the AIE Directive), upon which the AIE Regulations are based;
 - the 1998 United Nations Economic Commission for Europe Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (the Aarhus Convention); and
 - The Aarhus Convention—An Implementation Guide (Second edition, June 2014) (the Aarhus Guide).
9. What follows does not comment or make findings on each and every argument advanced but all relevant points have been considered.

Scope of the Review

10. In accordance with article 12(5) of the AIE Regulations, my role is to review the public authority's internal review decision and to affirm, annul or vary it. Where appropriate in the circumstances of an appeal, I will require the public authority to make available environmental information to the appellant.
11. The scope of this review is concerned solely with whether Coillte was justified, under the provisions of the AIE Regulations, in refusing access to information coming within the scope of 19 requests submitted by the appellant.

Preliminary Matters

12. I consider that the scheme of the AIE Regulations, and of the AIE Directive upon which the AIE Regulations are based, makes it clear that there is a presumption in favour of release of environmental information.
13. A review by my Office is considered to be de novo, which means that it is based on the circumstances and the law at the time of my decision.
14. As noted above, the appellant submitted, and paid the required fees for, 19 separate appeals to my Office. In the circumstances of these appeals, where the public authority issued a single decision on all 19 requests at issue, and where the grounds for refusal are not directly related to the content of particular records, I have decided that a composite decision is appropriate.



15. Where a request has been reformulated, the date of receipt of that request is the date on which the request was reformulated.
16. Article 5 of the AIE Regulations and Article 7 of the AIE Directive place duties on public authorities to actively disseminate environmental information. It is not within my powers to examine the implementation of those provisions by public authorities. However, I would note that the exemption in article 9(2)(a) of the AIE Regulations is not intended to endorse any failure by a public authority to comply with its duties of dissemination of environmental under article 5 of the AIE Regulations and Article 7 of the AIE Directive. Furthermore, in every case, regard should be had to the purpose of the AIE Regime, as reflected in Recital 1 of the Preamble to the AIE Directive, which provides that “increased public access to environmental information and the dissemination of such information contribute to greater public awareness of environmental decision-making and, eventually, to a better environment.”
17. In its decisions and submissions to my Office, Coillte noted that it was established pursuant to the Forestry Act 1988 (as amended) to carry out the business of forestry and related activities on a commercial basis. Coillte stated that in exercise of those functions it sells land for a range of uses such as renewable energy, infrastructure, community projects, and commercial developments. Coillte outlined that it operates in a highly competitive forestry and timber supply market. Coillte stated that, accordingly, while it has a statutory remit it also operates under significant commercial pressures. I accept that the significant increase in the level of AIE activity over the past year has presented challenges for a number of public authorities, including Coillte. However, the fact remains that the administration of the AIE Regulations is a statutory obligation which should be afforded as much weight as any other statutory obligation or the carrying out of other operational or commercial functions.

Analysis and Findings

18. Article 9(2)(a) of the AIE Regulations provides that a public authority may refuse to make environmental information available where the request is manifestly unreasonable having regard to the volume or range of information sought. This provision seeks to transpose Article 4(1)(b) of the AIE Directive, which provides that Member States may provide for a request for environmental information to be refused if the request is manifestly unreasonable, and, in turn, is based on part of Article 4(3)(b) of the Aarhus Convention.
19. Article 9(2)(a) of the AIE Regulations must be read alongside article 10 of the AIE Regulations, which provides for certain limitations on the ability of a public authority to refuse environmental information. Article 10(3) of the AIE Regulations requires a public authority to consider each request on an individual basis and weigh the public interest served by disclosure against the interest served by refusal and article 10(4) of the AIE Regulations provides that the grounds for refusal of a request shall be interpreted on a restrictive basis having regard to the public interest served by disclosure. Article 10(5) of the AIE Regulations provides that nothing in article 8 or 9 shall authorise a public authority not to make available environmental information which, although held with information to which article 8 or 9 relates, may be separated from such information.



20. In this case, Coillte considered 21 requests submitted by the appellant, including the 19 requests at issue here, together. It then refused access to all of the information sought under article 9(2)(a) of the AIE Regulations. Coillte informed this Office that it concluded that a total of 21 of the appellant's requests, when considered in the round, were manifestly unreasonable. It also outlined that the primary reason for reaching this conclusion "was due to the cumulatively unreasonable voluminousness and range of the requests received". It further stated that because the requests were submitted within a short period of time, this increased the administrative burden on Coillte in responding to the requests within the timeframes provided for in the AIE Regulations.
21. The AIE Regulations do not provide a definition for what constitutes a request. A request for environmental information under the AIE Regulations must therefore be viewed in light of the Aarhus Convention and is best described as the occurrence of a member of the public seeking information from a public authority. In cases such as this, where the appellant sent multiple communications to Coillte, the practical implication is that some of these separate communications may reasonably be considered to constitute a single request, or a smaller number of requests. This could be done by combining communications on thematic or temporal lines. It is my view that this exercise ideally should be carried out with cooperation between the parties, as the streamlining of the number of requests, and therefore the number of responses required, would ordinarily be mutually beneficial for the efficiency of the process.
22. The appellant submitted the requests to Coillte over a short period of time, indeed a number of them were submitted on the same day and 18 of them were submitted within 20 days.
23. Whether dealing with 21 separate requests, or a smaller number of multi-part requests, it is incumbent upon Coillte to ensure that it complies with each of the requirements of the AIE Regulations. It is clear that the volume of information requested by the appellant represented a challenge for Coillte. It is important to note that both article 7(2)(b) of the AIE Regulations and Article 3(2)(b) of the AIE Directive specifically envisage that public authorities will deal with voluminous or complex requests, albeit in a longer timeframe.
24. Crucially in this case, there was no reference to any analysis that Coillte had carried out under article 10(5) of the AIE Regulations on whether or not parts of the request could be separated out in order to provide a response to those parts. From my review of the requests, it appears to me that some of the requested information is of a kind that I would expect to be readily available to Coillte for provision to the public, particularly given its obligation under article 5(1)(b) of the AIE Regulations to maintain environmental information in a manner that is readily reproducible and accessible. For example, parts of the appellant's communications ask for specific maps showing Coillte lands, or copies of audit reports, which are types of records that are routinely requested and provided under the AIE Regulations, and should not, in themselves, place an undue burden on Coillte. Moreover, where a request, or part thereof, involves a query about the basis for published information, such as from an annual report, there is a reasonable expectation that the background statistics or rationale for that published information would be available to Coillte.
25. In its internal review decision and its submissions to this Office, Coillte indicated that some of the requests could be processed in less time than others. However, it decided not to process these parts and instead decided to refuse all parts of all communications under article 9(2)(a) of the AIE Regulations. Article 10(5) of the AIE Regulations requires that, in circumstances where some of the requested information is subject to an exception, Coillte must still consider whether parts of the



request can be answered. This includes where Coillte is relying on article 9(2)(a) of the AIE Regulations in stating that parts of the request(s) are manifestly unreasonable.

26. As a consequence, Coillte has not justified its decision to refuse access to the information sought in the 19 appeals at issue, under article 9(2)(a) of the AIE Regulations. I consider that the most appropriate course of action is to annul the decision of Coillte in respect of the 19 appeals and direct it to undertake a fresh decision-making process in respect of each. In processing the requests afresh, Coillte should have full regard to the provisions of the AIE Regulations and should seek to work with the appellant to combine the requests, where appropriate. Given comments made by Coillte in its internal review decision regarding some of the information sought, I would note that generally, prior to considering whether article 8 or 9 of the AIE Regulations applies, a public authority should assess whether the information sought is held by or for them. As Coillte ought to be aware, article 7(5) is the relevant provision to consider when the question arises as to whether requested environmental information is held by or for a public authority, however if a public authority wishes to rely on article 7(5) of the AIE Regulations in refusing access, it must set out its reasons for doing so.

Decision

27. Having carried out a review under article 12(5) of the AIE Regulations, I hereby annul Coillte's decision under article 9(2)(a) of the AIE Regulations to refuse access to information coming within the scope of 19 requests submitted by the appellant. I direct Coillte to process the 19 requests afresh.

Right of Appeal

28. A party to the appeal or any other person affected by this decision may appeal to the High Court on a point of law from the decision. Such an appeal must be initiated not later than two months after notice of the decision was given to the person bringing the appeal.

Ger Deering
Commissioner for Environmental Information
27 July 2022



Appendix 1: Original Requests

No.	References and Date Submitted	Extract of Original Request
1	<p>Appellant Ref: AIE/2022/0003 Coillte Ref: 20210046 OCEI Ref: OCE-120546-L8F1K3</p> <p>Email Subject: Coillte holdings - (1) Sales to IForUT and (2) purchases in 2021</p> <p>Date: 26 November 2021</p> <p>Date Refined: 21 December 2021 (removed part 2)</p>	<ol style="list-style-type: none">1. "For the period commencing on 1 January 2009 to today, can you please provide, by email, a list of the location and the size (in hectares) of all holdings (comprising land and forests) sold by Coillte to IForUT (The Irish Forestry Unit Trust).2. For the period commencing 1 January 2021 to today, can you please provide, by email, a list of the location and the size (in hectares) of all holdings (comprising land and forests) bought by Coillte..."
2	<p>Appellant Ref: AIE/2022/0004 Coillte Ref: 20210047 OCEI Ref: OCE-120551-L1C4T3</p> <p>Email Subject: De-stocking of forestry sites on peat</p> <p>Date: 26 November 2021</p> <p>Date Refined: 21 December 2021 (removed part 3)</p>	<p>"...please provide, by email, in relation to the national forestry estate managed both by either Coillte Teoranta or Coillte Nature.</p> <ol style="list-style-type: none">1. For the period 1 January 2014 to today, a list, including both location and size in hectares, of all lands deforested due to being situated, either in part or wholly, on peat.2. A list, including location, size in hectares and the future proposed deforestation date, of all lands earmarked to be deforested due to being situated, either in part or wholly, on peat.3. A list, including both location and size in hectares, of all lands situated, either in part or wholly, on peat..."
3	<p>Appellant Ref: AIE/2022/0006 Coillte Ref: 20210052 OCEI Ref: OCE-120552-N3B3F4</p> <p>Email Subject: All-Ireland Pollinator Plan 2021-2025 (AIPP)</p> <p>Date: 20 November 2021</p>	<p>"...in relation to Coillte Teoranta, please provide, by email, the following information:</p> <ol style="list-style-type: none">1. A list of the location and size of all sites currently participating in and committed to the AIPP 2021- 2025 (please refer to Action Point 50, page 31 of the AIPP 2021-2025)2. A list of the location and size of all sites ear-marked to participate in and commit to the AIPP 2021-2025, together with the proposed future date for participation in and commitment to the AIPP 2021-2025.3. The AIPP lists 186 Action Points. A list of all those points to which Coillte Teoranta has committed action over the period 2021- 2025.4. Information on how the Action Points adopted by Coillte Teoranta (as noted in request No. 3 above) are monitored, by whom and how frequently.5. Information on how the Action Points adopted by Coillte Teoranta (as noted in request No. 3 above) are verified, by whom and how frequently.6. For the period from 1 January 2020 to today, provide, by email, all environmental information held by or for Coillte



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		<p>Teoranta in relation to the AIPP 2021-2025 and the proposed AIPP for the period prior to 1 January 2021. (You will note that Coillte was a partner organisation of the AIPP in late 2020.) Records to include, inter alia:</p> <p>Internal and external correspondence (any media) to include, inter alia, text and WhatsApp messages</p> <p>Consultations</p> <p>Drafts and reports</p> <p>Notes of all telephone conversation in relation to any part of the AIPP or the proposed AIPP if before 1 January 2021.</p> <p>Notes of all meetings (actual or virtual) in relation to any part of the AIPP or the proposed AIPP if before 1 January 2021.</p> <p>Investigations, either conducted internally or externally by any third parties, in relation to any part of the AIPP 2021-2025 or the proposed AIPP if before 1 January 2021.</p> <p>7. For the period from 1 January 2021 to today, provide by email, all information collated and obtained for possible inclusion in an annual update on the activities of Coillte Teoranta under the AIPP 2021-2025 (please refer to Action Point 47, page 30, of the AIPP 2021-2025). For the avoidance of doubt, please include all information obtained since 1 January 2021, even if it is intended or currently proposed to exclude/omit some of the information in any future public update..."</p>
4	<p>Appellant Ref: AIE/2022/0005 Coillte Ref: 20210049 OCEI Ref: OCE-120553-K2P8N2</p> <p>Email Subject: All-Ireland Pollinator Plan 2021-2025 (AIPP)</p> <p>Date: 30 November 2021</p>	<p>"...in relation to Coillte Nature, please provide, by email, the following information:</p> <ol style="list-style-type: none">1. A list of the location and size of all sites currently participating in and committed to the AIPP 2021-2025 (please refer to Action Point 50, page 31 of the AIPP 2021-2025)2. A list of the location and size of all sites ear-marked to participate in and commit to the AIPP 2021-2025, together with the proposed future date for participation in and commitment to the AIPP 2021-2025.3. The AIPP lists 186 Action Points. A list of all those points to which Coillte Nature has committed action over the period 2021- 2025.4. Information on how the Action Points adopted by Coillte Nature (as noted in request No. 3 above) are monitored, by whom and how frequently.5. Information on how the Action Points adopted by Coillte Nature (as noted in request No. 3 above) are verified, by whom and how frequently.6. For the period from 1 January 2020 to today, provide, by email, all environmental information held by or for Coillte Nature in relation to the AIPP 2021-2025 and the proposed AIPP for the period prior to 1 January 2021. (You will note



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		<p>that Coillte was a partner organisation of the AIPP in late 2020.) Records to include, inter alia: Internal and external correspondence (any media) to include, inter alia, text and WhatsApp messages Consultations Drafts and reports Notes of all telephone conversation in relation to any part of the AIPP or the proposed AIPP if before 1 January 2021. Notes of all meetings (actual or virtual) in relation to any part of the AIPP or the proposed AIPP if before 1 January 2021. Investigations, either conducted internally or externally by any third parties, in relation to any part of the AIPP 202-2025 or the proposed AIPP if before 1 January 2021.</p> <p>7. For the period from 1 January 2021 to today, provide by email, all information collated and obtained for possible inclusion in an annual update on the activities of Coillte Nature under the AIPP 2021-2025 (please refer to Action Point 47, page 30, of the AIPP 2021-2025). For the avoidance of doubt, please include <u>all</u> information obtained since 1 January 2021, even if it is intended or currently proposed to exclude/omit some of the information in any future public update...”</p>
5	<p>Appellant Ref: AIE/2022/0007 Coillte Ref: 20210055 OCEI Ref: OCE-120559-S8Q1J5</p> <p>Email Subject: Forestry Programme 2014-2020: Impact of forestry on tourism, including ecotourism</p> <p>Date: 7 December 2021</p>	<p>“...In relation to the Forestry Programme 2014-2020 and for the period from 1 January 2014 to today (both dates inclusive) please provide, by email, all information (including unpublished information) relating to the impact of forestry under the Forestry Programme 2014-2020 (both afforestation and reforestation) on tourism, including ecotourism. The information provided should include, inter alia:</p> <ul style="list-style-type: none">- Internal and external correspondence (any media, including text and WhatsApp messages)- Advice received, including legal advice, including drafts- Any analysis, review or consideration etc of any material and / or draft proposals relevant to the request- Consultations (including public consultations)- Draft reports and final reports (including all appendices or annexes)- Notes of all telephone conversations where any part of the conversation is relevant to the request- Notes of all meetings (actual or virtual), including agendas, where any part of the meeting is relevant to the request- Investigations, either conducted internally, or externally by any third parties, that are relevant to the request...”
6	<p>Appellant Ref: AIE/2022/0009 Coillte Ref: 20210057 OCEI Ref: OCE-120560-D9V5Q6</p>	<p>“...It is reported on Page 111 of the Coillte Annual Report 2020 that 'The Group's forest holdings comprise approximately 360,635 hectares of forest land.. and approximately 16,590 hectares of standing forest plantations established on leased</p>



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	<p>Email Subject: Coillte Annual Report 2020: Land holdings</p> <p>Date: 7 December 2021</p>	<p>land.' It is also reported on Page 8 that 'Coillte is the custodian of more than 440,000 hectares of land,....' Noting the above, please provide, by email, the following information:</p> <ol style="list-style-type: none">1. A list of lands not included within the forest holdings, (i.e. 440,000 plus hectares less 360,635 hectares = 79,365 plus hectares) including townland location, county location and size (in hectares).2. The primary non-forest use of the lands listed in (1) above.3. A list, including townland location, county location and size (in hectares) of the 16,590 hectares held on a leasehold basis..."
7	<p>Appellant Ref: AIE/2022/0010 Coillte Ref: 20210058 OCEI Ref: OCE-120561-Z5T1D9</p> <p>Email Subject: Coillte Annual Report 2020: Forestry sector employment</p> <p>Date: 7 December 2021</p>	<p>"...It is reported on Page 31 of the Coillte Annual Report 2020 that 'The forestry sector supports some 12,000 jobs - largely in rural Ireland...' Noting the above, please provide, by email, the following information:</p> <ol style="list-style-type: none">1. The sources of your information behind the statement that the forestry sector supports:<ol style="list-style-type: none">a) around 12,000 jobsb) largely in rural Ireland2. All information held by Coillte both substantiating and relating to the statements of round 12,000 forestry jobs, largely in rural Ireland..."
8	<p>Appellant Ref: AIE/2022/0011 Coillte Ref: 20210059 OCEI Ref: OCE-120562-Z4D2N5</p> <p>Email Subject: Coillte Annual Report 2020: Joint Forest Certification Audit</p> <p>Date: 7 December 2021</p>	<p>"...It is reported on Page 20 of the Coillte Annual Report 2020 that 'An excellent result obtained in the joint forest certification audit by FSC (Forest Stewardship Council) and PEFC (Programme for the Endorsement of Forest Certification) demonstrated Coillte's excellence in forest management...'</p> <p>Noting the above, please provide, by email, the following information :</p> <ol style="list-style-type: none">1. the joint forest audit undertaken by FSC (Forest Stewardship Council) and PEFC (Programme for the Endorsement of Forest Certification) referred to in the 2020 Annual Report.2. all communication between Coillte and FSC and PEFC, both before and after the joint audit, in connection with the joint audit referred to in the 2020 Annual Report. <p>The information provided should include, inter alia:</p> <ul style="list-style-type: none">- Internal and external correspondence (any media, including text and WhatsApp messages)- Notes of all telephone conversations where any part of the conversation is relevant to the request- Notes of all meetings (actual or virtual) , including agendas, where any part of the meeting is relevant to the request..."
9	<p>Appellant Ref: AIE/2022/0013 Coillte Ref: 20210061 OCEI Ref: OCE-120563-C1G6J0</p>	<p>"...It is reported on Page 22 of the Coillte Annual Report 2020 that, during 2020, Coillte purchased 412 hectares. Noting the above, please provide, by email, the following information:</p>



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	<p>Email Subject: Coillte Annual Report 2020: 412 Hectares purchased in 2020</p> <p>Date: 7 December 2021</p>	<ol style="list-style-type: none">1. A list of the lands purchased, including townland locations, county and size (in hectares)2. The primary use proposed in relation to each of the lands purchased, including proposed species mix if forestry is the primary use proposed by Coillte...”
10	<p>Appellant Ref: AIE/2022/0014 Coillte Ref: 20210062 OCEI Ref: OCE-120568-P6Z6K4</p> <p>Email Subject: Coillte Annual Report 2020: Average 816 employees</p> <p>Date: 7 December 2021</p>	<p>“...It is reported on Page 97 of the Coillte Annual Report 2020 that the average number of employees employed by Coillte during this year was 816.</p> <p>Noting the above, please provide, by email, the following information:</p> <ol style="list-style-type: none">1. The number and principal role of those employees working exclusively within Coillte Nature during 20202. The number and principal role of those employees working principally, but not exclusively, within Coillte Nature during 2020...”
11	<p>Appellant Ref: AIE/2022/0015 Coillte Ref: 20210063 OCEI Ref: OCE-120570-X3B8S0</p> <p>Email Subject: Coillte Annual Report 2020: Top 50 forests and visitor numbers</p> <p>Date: 7 December 2021</p>	<p>“...It is noted on Page 17 of the Coillte Annual Report 2020 that 'In the period March to December 2020, our top 50 forests experienced a c. 40% increase in visits to 2.2m ...'</p> <p>Noting the above, please provide, by email, the following information:</p> <ol style="list-style-type: none">1. The name, location and size of your top 50 forests2. For each of the top 50 forests, all data substantiating your statement that visitor numbers increased by c. 40% over the 9 month period to 31 December 2020.3. For each of the top 50 forests, all data substantiating your statement that total visits amounted to 2.2 million over the 9 month period to 31 December 2020...”
12	<p>Appellant Ref: AIE/2022/0016 Coillte Ref: 20210064 OCEI Ref: OCE-120571-Q8Q2B4</p> <p>Email Subject: National Peatlands Strategy 2015: Action Point 7</p> <p>Date: 7 December 2021</p>	<p>“...for the time period from 1 January 2015 to today (both dates inclusive), please provide, by email, all information in connection with Action Point 7 of the National Peatlands Strategy 2015.</p> <p>The information provided should include, inter alia:</p> <ul style="list-style-type: none">- Internal and external correspondence (any media, including text and WhatsApp messages)- Advice received, including legal advice, including drafts- Any analysis, review or consideration etc of any material and / or draft proposals relevant to the request- Consultations, including public consultations- Draft reports and final reports (including all appendices or annexes)- Notes of all telephone conversations where any part of the conversation is relevant to the request- Notes of all meetings (actual or virtual), including agendas, where any part of the meeting is relevant to the request- Investigations, either conducted internally, or externally by any third parties, that are relevant to the request...”
13	<p>Appellant Ref: AIE/2022/0017 Coillte Ref: 20210065</p>	<p>“...Coillte wrote to the LCC Planning Department on 7 August 2020. The letter was headed 'Review of Leitrim County</p>



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	<p>OCEI Ref: OCE-120576-C9K5Y8</p> <p>Email Subject: Letter dated 7 August 2020 to Leitrim County Council Planning Department</p> <p>Date: 7 December 2021</p>	<p>Development Plan' and was in response to the publication of the Leitrim County development Plan 2022-2028 Strategic Issues Paper, dated 17 June 2020.</p> <p>In this letter, Coillte wrote:</p> <p>‘Located at a range of scenic locations in the county, the Coillte estate is in a strong position to play a key role in supporting the provision of new tourism and recreation uses, including thematic tourism/ recreational projects at appropriate locations’.</p> <p>Noting the above, please provide the following information:</p> <ol style="list-style-type: none">1. A list of all Coillte's lands considered by Coillte to be located in 'scenic locations' in Leitrim, for purposes of the letter dated 7 August 2020. The list is to include the townland location and size of the lands (in hectares)...”
14	<p>Appellant Ref: AIE/2022/0018 Coillte Ref: 20210066 OCEI Ref: OCE-120577-M2G0Z0</p> <p>Email Subject: Coillte Nature</p> <p>Date: 9 December 2021</p>	<p>“...please provide, by email,</p> <ol style="list-style-type: none">1. a table with the approximate size and location (county and townland(s)) of the 2,400 hectares of native forests noted on your website.2. a table with the approximate size and location (county and townland(s)) of the 3,200 hectares of peatlands noted on your website.3. a table of the remaining over 82,400 hectares of land, noting the current primary use of the land, approximate size and location (county and townlands) <p>I am assuming that if you are unable to provide any information for Table 3, then your website may need to be amended to more accurately reflect the current extent of the estate managed by Coillte Nature...”</p>
15	<p>Appellant Ref: AIE/2022/0019 Coillte Ref: 20210068 OCEI Ref: OCE-120579-D7F0Z1</p> <p>Email Subject: Legal costs incurred by Coillte in the High Court case 208/453 MCA</p> <p>Date: 16 December 2021</p>	<p>“...Please provide, by email, the following information in relation to the High Court case 2018/453/MCA:</p> <ol style="list-style-type: none">1. Legal costs incurred by Coillte with regard to the legal team instructed by and acting for Coillte; and2. Legal costs of any party to the case, payable by Coillte, as a result of any Award as to Costs made by the Court...”
16	<p>Appellant Ref: AIE/2022/0020 Coillte Ref: 20210069 OCEI Ref: OCE-120580-P9G4W1</p> <p>Email Subject: Potential future wind energy project in Leitrim</p> <p>Date: 16 December 2021</p>	<p>“...Please provide, by email, the following information:</p> <ol style="list-style-type: none">1. Details of all locations (e.g. maps) currently being evaluated for wind farm energy development in Leitrim.2. Details of all information on environmental and landscape impacts (e.g. noise, ornithology etc.) received by Coillte (including all information in draft(s) format) either from external parties or from information/research undertaken by Coillte, for the sites currently indicated for future wind energy development in Leitrim3. A list of information on environmental and landscape impacts for which instructions have been issued by Coillte,



		<p>but where the information is currently awaited to be received by Coillte, in relation to the sites currently indicated for future wind energy development in Leitrim. Information requested to include the current estimated date of when Coillte will receive the requested information that is currently awaited.</p> <p>4. Information on the current date for the next review for the evaluations of locations for wind farm energy developments in Leitrim.</p> <p>The information provided should include, inter alia:</p> <ul style="list-style-type: none">- Internal and external correspondence (any media, including text and WhatsApp messages)- Advice received, including legal advice, including drafts- Any analysis, review or consideration etc of any material and / or draft proposals relevant to the request- Consultations, including public consultations- Draft reports and final reports (including all appendices or annexes)- Notes of all telephone conversations where any part of the conversation is relevant to the request- Notes of all meetings (actual or virtual), including agendas, where any part of the meeting is relevant to the request- Investigations, either conducted internally, or externally by any third parties, that are relevant to the request..."
17	<p>Appellant Ref: AIE/2022/0021 Coillte Ref: 20210070 OCEI Ref: OCE-120581-L7J0K4</p> <p>Email Subject: Lissinagroagh Wind Farm Project, Leitrim</p> <p>Date: 16 December 2021</p>	<p>"...Please provide, by email, the following information in relation to the Lissinagroagh Wind Farm Project in Co. Leitrim:</p> <ol style="list-style-type: none">1. All information in relation to the cost benefit analysis (or other economic analysis if this exists), to include all draft analysis undertaken in connection with the Lissinagroagh Wind Farm project.2. All information in relation to the business case for the project, including earlier draft business cases. In the event that there are differing versions of the business case, I am requesting that all versions/and all drafts of differing versions are supplied.3. All information that was submitted to the Coillte Board regarding this project.4. A copy of the decision of the Board to proceed with the project.5. A copy of all Board meeting minutes discussing this project <p>The information provided should include, inter alia:</p> <ul style="list-style-type: none">- Internal and external correspondence (any media, including text and WhatsApp messages)- Advice received, including legal advice, including drafts- Any analysis, review or consideration etc of any material and / or draft proposals relevant to the request- Consultations, including public consultations



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		<ul style="list-style-type: none">- Draft reports and final reports (including all appendices or annexes)- Notes of all telephone conversations where any part of the conversation is relevant to the request- Notes of all meetings (actual or virtual) , including agendas, where any part of the meeting is relevant to the request- - Investigations, either conducted internally, or externally by any third parties, that are relevant to the request..."
18	<p>Appellant Ref: AIE/2022/0022 Coillte Ref: 20210071 OCEI Ref: OCE-120582-V3X5B8</p> <p>Email Subject: Hen Harrier Conservation and the Forestry Sector in Ireland 2015 Report</p> <p>Date: 16 December 2021</p>	<p>"... please provide, by email, the following information:</p> <ol style="list-style-type: none">1. A map showing all Coillte forests located in squares G92, G93 and G94 of Figure 1 in the Hen Harrier Conservation and the Forestry Sector in Ireland 2015 Report. (If possible, also include on the map the boundaries of squares G92, G93 and G94)2. A table listing the townlands(s) locations of all Coillte forests located in squares G92, G93 and G94 of Figure 1 in the Hen Harrier Conservation and the Forestry Sector in Ireland 2015 Report.3. For the period 1 January 2015 to today (both dates inclusive) information on any hen harrier activity in any Coillte forest located in Leitrim (whether within squares G92, G93 and G94 or elsewhere in Leitrim) <p>The information provided should include, inter alia:</p> <ul style="list-style-type: none">- Internal and external correspondence (any media, including text and WhatsApp messages)- Advice received, including legal advice, including drafts- Any analysis, review or consideration etc of any material and / or draft proposals relevant to the request- Consultations, including public consultations- Draft reports and final reports (including all appendices or annexes)- Notes of all telephone conversations where any part of the conversation is relevant to the request- Notes of all meetings (actual or virtual), including agendas, where any part of the meeting is relevant to the request- Investigations, either conducted internally, or externally by any third parties, that are relevant to the request..."
19	<p>Appellant Ref: AIE/2022/0023 Coillte Ref: 20220002 OCEI Ref: OCE-120583-G5D3T5</p> <p>Email Subject: EIA Directive Annex II a - Leitrim Forest road applications dated 1 January 2021 to 31 December 2021 (both dates inclusive).</p> <p>Date: 8 January 2022</p>	<p>"...With reference to Paragraph 3 (a) of Annex IIa of the EIA Directive and for the time period from 1 January 2021 to 31 December 2021 (both dates inclusive), please provide, by email, all information submitted by Coillte to the Forest Service on any likely significant effects on the environment resulting from the 'expected residues and emissions and the production of waste' for any applications for development consent for forest roads (individual or cumulative) in County Leitrim..."</p>