

**Subject:** EIR(07)04 - Request for Internal Review

**From:** Nick Hildyard

**Date:** Mon, 20 Aug 2007 18:49:50 +0100

**To:** Information Access, sent by email

Dear Ms Rashid,

EIR(07)04

This is a request for an internal review of the ECGD's decision of 24th July 2007 not to provide me with the full Impact Questionnaire for the Shin Wolsuing Nuclear Power Plant in Korea, on the basis that some of this information is "not relevant" to my request.

We note that you have considered this request under the EIR regulations. However neither these regulations nor the Freedom of Information Act entitle the ECGD to withhold information because it is deemed to be irrelevant. We note your failure to cite any specific exemptions on which you wish to rely, contrary to what is required by the regulations. In addition, you appear not have made any attempt to consider the public interest in the disclosure of the information requested. .

We make the following brief points though we reserve the right to raise other points before the Information Commissioner.

1. Impact Questionnaires were specifically introduced by ECGD for the purpose of obtaining information about the potential environmental impacts of projects. We would argue that all the information in the Impact Questionnaire for the Shin Wolsuing nuclear plant is thus of relevance under the Environmental Information Regulations.
2. As set out above, ECGD gives no indication of the issues which it has deemed to be "not relevant". However, assuming that the form used was similar to the standard form that appears on ECGD's website, it would appear that ECGD has redacted information relating to independent impact assessments of the project, details of the use of natural resources by the project, details of expected greenhouse gas emissions, and details of social and human rights impacts -- all of which are clearly of relevance to our request and which also constitute information that falls within the Environmental Information Regulations.

We look forward to hearing from you with confirmation that the redacted information will be provided to us as quickly as possible.

Yours Sincerely,

Nicholas Hildyard  
The Corner House