



3rd April 2025

Right to Know

requests@righttoknow.ie

Re: AIE request AIE.25.020

Dear Sir/Madam,

We refer to your request for a review of the decision made by this Department on 25 February and 4 March not to release the records to which you requested access under the European Communities (Access to Information on the Environment) Regulations 2007 to 2018 (S.I. No. 133 of 2007, S.I. No. 662 of 2011 , S.I. No. 615 of 2014 and S.I. 309 of 2018) (hereafter referred to as the AIE Regulations).

Your original request was for:

- 1) Minutes of any Meeting of the Bovine TB Stakeholder Forum in 2024 since Meeting 20 (22 May 2024), together with copies of any presentations circulated at these meetings, and any data/reports provided to farming organisations after the meetings

- 2) Bovine TB Stakeholder Forum – Meeting 20, Date: 22 May 2024
 - a) DAFM Presentation circulated (Disease Trends Update)
 - b) Research Update presentation circulated
 - c) Simon More, UCD critique of the TB eradication programme presentation circulated
 - d) DAFM data provided to farming organisation in response to request for statistics in respect of animals where PCR test carried out
 - e) DAFM data provided to farming organisation request analysis of C10 herds who are now in a breakdown

- 3) Bovine TB Stakeholder Forum – Meeting 19, Date: 27 February 2024



- a) Minister's response to the letter from the IWG Chairman on the Wildlife Programme
- b) Summary document of the work of the TB Forum and IWG to date
- c) Department provided an update on wildlife figures in terms of vaccination, culling and staffing
- d) DAFM presentation - Disease Trends Update The Department presented TB Disease Trends 2022-2024 which examined the increase in rolling totals of TB reactors and restricted herds
- e) ESRI behavioural report findings on Bovine TB
- f) Simon More presented preliminary results on a study "Is badger vaccination, in combination with existing cattle-based controls sufficient to eradicate bTB from Ireland?"

4) Minutes of any Meeting of the Finance Working Group – since Meeting 16, 24th February 2023 together with copies of any presentations circulated at these meetings, and any data/reports provided to farming organisations after the meetings

5) Minutes of the Bovine TB Stakeholder Forum's Implementation Working Group (IWG) – since Meeting 39, 03 September 2024, together with copies of any presentations circulated at these meetings, and any data/reports provided to farming organisations after the meetings

- a) DAFM update on disease situation by county
- b) DAFM data analysis on movement of animals between herds

6) Bovine TB Stakeholder Forum's Implementation Working Group (IWG) – Meeting 38, 02 July 2024

a) DAFM records on minority herds who do not carry out TB tests and are trade restricted (cannot sell on the open market). It is unclear from minutes if this data was made available to farming organisations and/or IWG members, so please consider this request for the records regardless of whether provided or not, in summary format as aggregated by DAFM for reporting purposes

For context on above please see

<https://www.gov.ie/en/collection/d3baf-tb-forum/>



<https://www.gov.ie/en/collection/217aa-finance-working-group/>

Wila Bruce and Aishling Cronin were assigned to review your request. We made a decision on your review request on 3rd April 2025. Our decision on review is an entirely new and separate decision on your request and is explained below.

We are varying the original decision in respect of item 3 (f) as this report has now been published. See link to the final report [Evaluating the effectiveness of badger vaccination combined with cattle test-and-removal in managing Bovine Tuberculosis: Insights from a two-host and multi-route transmission model - ScienceDirect](#)

We must inform you that we have not found any grounds to reverse the other decisions made by the initial decision-makers and accordingly we affirm their decision to refuse access to the records requested under Article 9 (2) (c) and (d) of the AIE Regulations.

The records contain information used in the course of completion, and also concerns internal communications of public authorities.

9 (2) A public authority may refuse to make environmental information available where the request—

(c) concerns material in the course of completion, or unfinished documents or data, or

(d) concerns internal communications of public authorities, taking into account the public interest served by the disclosure.

We are refusing access to records in accordance with Article 11.

In arriving at a decision on your request, we confirm that we have had regard to the provisions of Article 10 of the Regulations, as a decision to refuse to disclose information under Articles 8 and/or 9 must not be taken in isolation from the relevant provisions in Article 10.

In line with Article 10(3), our deliberations have included weighing the public interest served by disclosure against the interest served by refusal.



Under Article 12 of the AIE Regulations you may appeal this decision, by writing to the Commissioner for Environmental Information at the address given below:

Office of the Commissioner for Environmental Information
6 Earlsfort Terrace
Dublin 2
D02 W773
Phone: +353-1-639 5689

It is also possible to appeal on the website of the Commissioner www.ocei.gov.ie.

If you wish to appeal, you should do so within **1 month** of this notification. The fee for such an appeal is €50 or €15 if you are the holder of a medical card or the dependent of a holder of a medical card.

We can be contacted at Wila.Bruce@agriculture.gov.ie and Aishling.Cronin@agriculture.gov.ie to answer any questions you may have, and to assist you generally in this matter.

Yours sincerely,

Aishling Cronin
Assistant Principal Officer
Ruminant Animal Health Policy Division

Wila Bruce
Assistant Principal Officer