

Our ref: C/16/00137

23 December 2015

Mr Gerard McPhee  
10 McCubbin Street  
KEW EAST VIC 3102

Dear Mr McPhee,

**CONFIDENTIAL  
PROVIDED IN CONFIDENCE**

**Application for Review under Section 49(A) of the *Freedom of Information Act* 1982**

Please find enclosed a copy of the Notice of Decision in respect of your application for review under section 49A of the *Freedom of Information Act* 1982 (**the FOI Act**).

I am required under section 49P(3)(b) to advise you that, under section 50(1)(b) of the FOI Act, you have a right to apply to the Victorian Civil and Administrative Tribunal (**the Tribunal**) for a review of my decision.

If you decide to apply to the Tribunal for a review of my decision, section 52(5) provides that you must do so within 60 days of notice of my decision on your application for review under section 49A being provided to you.

Yours sincerely



Michael Ison  
**Acting Freedom of Information Commissioner**



## NOTICE OF DECISION

### Application for Review under section 49A of the *Freedom of Information Act 1982*

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Our Reference:	C/16/00137
Applicant:	Gerard McPhee
Agency:	Mount Buller & Mount Stirling Alpine Resort Management Board

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Date of Original Request:	24 June 2015
Date of Decision by Agency:	10 August 2015

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Type of Decision for Review:	Section 49A(1)(a) — Refusal to grant access to a document in accordance with a request
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Date Application for Review Received:	28 August 2015
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Review Decision Made By:	Michael Ison Acting Freedom of Information Commissioner
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Date of Review Decision:	23 December 2015
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## Notice of Decision

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This is a Notice of Decision in respect of an application under section 49A(1)(a) of the *Freedom of Information Act* 1982 (**the FOI Act**) for review concerning a decision of the Mount Buller & Mount Stirling Alpine Resort Management Board (**the Agency**).

My decision on the original request under review is that –

- (a) The Applicant be granted access, in part, to Document 1, with:
- the names of the occupants listed for the reasons, 'Staff accommodation for winter' or 'Staff accommodation', to be deleted pursuant to section 33(1) of the FOI Act;
  - the second name in the range '29/07/2015 30/07/2015', to be deleted pursuant to section 33(1) of the FOI Act;
  - the second name in the range '31/08/2014 1/09/2014', to be deleted pursuant to section 33(1) of the FOI Act;
  - all other personal affairs information to be released.
- (b) The Applicant be denied access, in full, to Document 3, pursuant to sections 30(1), 34(4)(a) and 25 of the FOI Act.
- (c) The Applicant be denied access, in full, to Document 4, pursuant to sections 30(1) and 34(4)(a) of the FOI Act.

## Reasons for Decision

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### The Initial FOI Request

1. On 24 June 2015, the Applicant made a request under section 17 of the FOI Act to the Agency.
2. The request sought access to –

#### **Black Forest Lodge**

I require the visitor days/occupancy nights of each “official visitor” to Black Forest Lodge, and to the extent known, the organizations they represent and the purpose of the visit. I only require this for the past five years.

By “Official Visitor” I mean anyone employed or representing any state government department or statutory authority...

...

#### **Business Case**

I am seeking the May 2011 updated business case for the Corn Hill link road. I am not seeking earlier documents in this FOI request.

#### **Master Plan V2**

Please supply the October 2010 Part 2 of the Master Plan.

3. The request related to the planning of a new road between Mount Buller and Mount Stirling.

### The Agency's Decision

4. By letter dated 10 August 2015, the Agency, through one of its officers (the decision maker), responded to the Applicant's request.
5. The Agency identified three documents as falling within the terms of the Applicant's request.
6. The Agency granted access, in part, to two documents and denied access, in full, to one document, claiming exemptions under section 30, 33 and 34(4)(a) of the FOI Act.

7. With respect to its application of section 30 of the FOI Act, the Agency stated –

...because the information is an internal working document, is speculative in nature and in draft form, and consequently could engender uninformed and unnecessary public debate. This is a section 30 exemption.

...

In relation to the May 2011 Business Case Update, the document is exempt from release pursuant to section 30 of the Act, namely that it is an internal working document the release of which would be contrary to the public interest. The basis for this decision is that the document would disclose matter in the nature of opinion, advice and recommendations of the Board in the course of its deliberative processes, and would be contrary to public interest in that it relates to an ongoing project that has not yet been finalised or put out to public tender, that by its release it could disadvantage the Board in any future commercial negotiations, and could engender uninformed and unnecessary public debate in circumstances where the project is not yet finalised and its commercial and other objectives are still under review.

8. With respect to its application of section 33 of the FOI Act, the Agency stated –

In relation to the Black Forest Lodge Accommodation Records – Chart of Accommodation Records from 2010 to 2015, to partially release the information, but with personally identifying information redacted, pursuant to section 33 of the Act. The basis for this decision is that the accommodation of persons at the Lodge is a personal matter to those individuals, in that persons accommodated were not performing in their official capacities whilst in their accommodation.

9. With respect to its application of section 34(4)(a) of the FOI Act, the Agency stated –

Appendix 7: Preliminary Economic Assessment, Page 8 of the SGS Report, Table 1, breakdown of financial totals. Indicative costs information would be likely to disadvantage the Board in negotiating and/or tendering for some of the listed projects. This is a section 34(4)(a) exemption.

Appendix 7: Preliminary Economic Assessment, Page 9 of the SGS Report, the individual totals listed per site which show the private investment potentially expected to be leveraged per site. These projects are yet to be released publically or go to tender, and would be likely to disadvantage the Board if the amounts were released publically.

### **Additional Document**

10. By letter dated 23 September 2015, the Agency's legal representative provided an additional document the subject of this review. In its letter it stated that –

The appendix was inadvertently omitted from the previously supplied 2011 Business Case Update, and we apologise for any inconvenience.

11. Access to the additional document was denied to the Applicant in full, pursuant to sections 30(1) and 34(4)(a) of the FOI Act.

### **Application for Review under Section 49A**

12. By form dated 28 August 2015, the Applicant made application for a review of the decision of the Agency in respect of his request for access to documents.

### **Opportunity to Make Written Submissions**

13. By letter dated 31 August 2015, the Applicant was given an opportunity to make a written submission supporting his application for review.
14. As at the date of this decision, a written submission has not been received from the Applicant. However, I note that extensive submissions were attached to his Application for review.
15. By letter dated 31 August 2015, the Agency was given an opportunity to make a written submission.
16. By email dated 15 September 2015, the Agency's legal representative made a written submission.
17. I have considered all written communications and submissions provided to me.

### Documents Subject of this Review

18. On 11 September 2015 and 24 September 2015, the Agency provided copies of the following documents the subject of this review –

No.	Description	Pages	Agency Decision
1	Black Forest Lodge Accommodation Records	1	Released in part s 33
2	Mt Buller Master Plan Report Volume 2	218	Released in part ss 30, 34(4)(a)
3	May 2011 Business Case Update	40	Denied in full ss 30, 34(4)(a)
4	Appendix 1 to May 2011 Business Case Update	9	Denied in full ss 30, 34(4)(a)

19. By telephone on 11 November 2015, the Applicant advised a staff member of my office that he does not require a review of the material deleted from Document 2. Accordingly, Document 2 is not subject of this review.

### Right to Access

20. Under section 13 of the FOI Act, every person has a legally enforceable right to obtain access, in accordance with the FOI Act, to a document of an agency or an official document of a Minister, other than an exempt document.
21. Part IV of the FOI Act identifies the various categories of exempt documents. It also defines what constitutes exempt documents.

## Application of Section 33(1)

22. The Agency applied section 33(1) of the FOI Act to deny access, in part, to Document 1.
23. Section 33 of the FOI Act provides –

### 33 Document affecting personal privacy

- (1) A document is an exempt document if its disclosure under this Act would involve the unreasonable disclosure of information relating to the personal affairs of any person (including a deceased person).

...

- (9) In this section—

***information relating to the personal affairs of any person*** includes information—

- (a) that identifies any person or discloses their address or location; or
- (b) from which any person's identity, address or location can reasonably be determined.

### Nature of Exemption

24. A document is exempt under section 33(1) of the FOI Act if two conditions are satisfied –
- (a) disclosure of the document under the FOI Act must 'involve' the disclosure of information relating to the 'personal affairs' of a person; and
- (b) such disclosure must be 'unreasonable'.
25. Section 33(9) makes it clear that information relating to the 'personal affairs' of a person includes information that identifies any person or discloses their address or location or by which this can be reasonably determined.

Do the documents contain personal affairs information?

26. Document 1 is a spreadsheet containing details of 'Official Visitors' who were occupants at the Black Forest Lodge, which is accommodation owned by the Agency.
27. In his FOI request, the Applicant specified that an 'Official Visitor' for the purpose of his request is –
- ...anyone employed or representing any state government department or statutory authority.
28. Document 1 contains the names of the 'Official Visitors' who were occupants at the Black Forest Lodge between 2010 and 2015, as well as the name of the organisation or agency they were representing or employed by at the time.
29. I am satisfied that the names of the occupants constitute personal affairs information. Furthermore, where the name of the organisation could reveal the identity of the occupant, I am satisfied that it constitutes personal affairs information as well.

Does disclosure involve the unreasonable disclosure of personal affairs information?

30. I have considered the following factors in deciding whether disclosure of the personal information contained in the document would amount to unreasonable disclosure of the personal affairs of any person –
- (a) The circumstances in which the information was obtained;
  - (b) The Applicant's interest in the information to be disclosed;
  - (c) The nature of the information to be disclosed;
  - (d) Whether the individual whose personal affairs are included in the documents would be likely to object to the release of that information;

- (e) Whether any public interest would be promoted by the release of the information;
  - (f) The likelihood of further disclosure of the personal information, should it be released; and
  - (g) Whether the disclosure of information relating to the personal affairs of any person would, or would be reasonably likely to, endanger the life or physical safety of any person.
31. The Agency has not provided me with any information regarding the attitude to the release of the information of any of the individuals whose information is contained in the documents under review.
32. The Applicant is interested in obtaining access to the accommodation records because he suspects that –
- ...persons charged with preparing reports critical to planning are accommodated and supported outside the scope of any official visit...and may be a conflict of interest.
33. In his application for review, the Applicant submitted that –
- The attendance of persons at publically funded accommodation...is not a personal matter. Guests of [the Agency] receive a significant benefit and thus the matter is one of a query about public expenditure and probity rather than personal affairs.
34. In its submission on behalf of the Agency, the Agency's legal representative stated that there would be no public interest benefit through the release of the personal affairs information.
35. I note that the Applicant describes this matter as a 'query about public expenditure'. Although I cannot determine whether disclosure would benefit the public interest in this instance, the notion of querying public expenditure is in the public interest and is a factor I have taken into account.

36. In *AB v Department of Human Services*<sup>1</sup>, it was stated in relation to the application of section 33 of the FOI Act that –

The file of a government department is likely to contain the names of many departmental officers. In the normal course there will be no justification for deleting their names.

37. In its submission dated 15 September 2015, the Agency's legal representative stated that disclosure of the personal affairs information would be unreasonable because –

The persons were not acting in their official capacities whilst being accommodated...or otherwise performing official duties. They were engaged in private activities, in their personal time.

38. Document 1 lists the 'reason' for each individual's accommodation. I accept that 'Staff Accommodation for winter' and 'Staff Accommodation' constitutes private activities in personal time and is a consideration against disclosure. However, other reasons such as 'Board Meeting', 'RAFC meeting' and 'Official opening Snow season', suggest that the occupants were not engaged in purely private activities and that they may have been acting in their official capacities.
39. An internet search revealed that some of the individuals were acting in their official capacities during their stay at the Black Forest Lodge. Furthermore, there are publicly available documents that state that some of those individuals were guests at the Black Forest Lodge.
40. Many of the names contained in Document 1 are of Agency officers. It also contains the names of previous Agency board members as well as board members from the Falls Creek Alpine Resort Management Board and the Mt Hotham Resort Management Board, which are both statutory entities like the Agency, established under the *Alpine Resorts (Management) Act 1997*.
41. The other individuals named in Document 1 are current or previous members of parliament.

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<sup>1</sup> [2001] VCAT 2020

42. I have taken into account that senior departmental officers and members of parliament are decision makers within the public sphere. They are at an appropriate level to be accountable for the decision making of the department or organisation they represent. I consider the public availability of their names and other information on the internet, to reflect the public accountability of their roles.
43. On the other hand, two individuals identified in Document 1 do not share the same level of public recognition. I note that administrative staff are generally not accountable for the conduct and decision making of an organisation and do not expect their personal affairs information to be publicly available.
44. The Applicant operates an internet website where he has published documents obtained through the FOI process. Although it is clear that he may further disseminate the information contained in the document, I note that portions of the personal affairs information contained in Document 1 are already available in the public sphere. Furthermore, the information contained in the document is not particularly sensitive, being only the names of individuals and the organisations they represent.
45. I am of the view that consideration of whether disclosure of the personal affairs information would, or would be reasonably likely to, endanger the life or physical safety of any person, is not applicable in the circumstances.
46. I also note the right of every person to obtain access to documents under the FOI Act.

47. Having taken all relevant factors into account, I am satisfied that in this instance, disclosure of personal affairs information: is not unreasonable for the following:

- current and previous members of parliament; and
- current and previous board members or executive-level Agency and other senior departmental officers, who were guests at the Black Forest Lodge for reasons other than 'Staff Accommodation for winter' or 'Staff Accommodation'.

### **Application of Section 30**

48. The Agency applied section 30(1) to deny access, in full, to Documents 3 and 4.

49. Section 30(1) of the FOI Act provides –

#### **30 Internal working document**

- (1) Subject to this section, a document is an exempt document if it is a document the disclosure of which under this Act—
- (a) would disclose matter in the nature of opinion, advice or recommendation prepared by an officer or Minister, or consultation or deliberation that has taken place between officers, Ministers, or an officer and a Minister, in the course of, or for the purpose of, the deliberative processes involved in the functions of an agency or Minister or of the government; and
  - (b) would be contrary to the public interest.

#### Nature of the exemption

50. Section 30(1) has three requirements –

- (a) The document must disclose matter in the nature of opinion, advice or recommendation prepared by an officer or Minister or consultation or deliberation that has taken place between officers, Ministers or an officer and a Minister; and

- (b) Such matter must be made in the course of, or for the purpose of, the deliberative processes involved in the functions of an agency or Minister or of the government; and
  - (c) Disclosure of the matter would be contrary to the public interest.
51. The exemption does not apply to documents that contain purely factual material (section 30(3)).

Does the document disclose matter in the nature of opinion, advice or recommendation, or consultation or deliberation?

52. In *Halliday v Office of Fair Trading*<sup>2</sup> the Administrative Appeals Tribunal held that 'opinion, advice or recommendation' conveys a meaning of matters in the nature of a 'personal view', 'an opinion recommended or offered' or 'a presentation worthy of acceptance'.
53. A document that does not contain opinion, advice or recommendation may still meet the requirements of the exemption if it discloses consultation or deliberations between officers of the Agency.
54. If disclosure of the document would not disclose matter in the nature of an opinion, advice or recommendation, nor consultation or deliberation, then there is no need to consider the remaining requirements of section 30(1).
55. Document 3 is comprised of 40 pages. It is an addendum to a business case that was endorsed in 2008. The purpose of the addendum is to review the original business case and to update it with relevant developments that have occurred since it was endorsed.
56. Document 4 is comprised of nine pages. It is the appendix to Document 3.

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<sup>2</sup> Unreported AAT of Vic, Coghlan PM 20 July 1995

57. Document 3 contains some information that is purely factual, however, large portions of it are in the nature of opinion, recommendation and consultation.

58. Document 4 consists of cost assumptions, revenue assumptions and estimated cash flow analyses in relation to the project, prepared by external consultants for the Agency. I am satisfied that this material constitutes matter in the nature of consultation.

Was the opinion, advice, recommendation, consultation or deliberation disclosed in the document provided in the course of, or for the purpose of, the deliberative processes of the Agency?

59. The term 'deliberative process' has been interpreted widely and includes any of the processes of deliberation or consideration involved in the functions of an agency, Minister or government.<sup>3</sup>

60. In *Re Waterford and Department of Treasury (No. 2)*<sup>4</sup> the Administrative Appeals Tribunal held that –

...“deliberative processes” [is] wide enough to include any of the processes of deliberation or consideration involved in the functions of an agency... In short, ...its thinking processes — the processes of reflection, for example, upon the wisdom and expediency of a proposal, a particular decision or a course of action.

61. I am satisfied that the planning for a road between Mt Buller and Mt Stirling is a deliberative process of the Agency, and that the material in the nature of opinion, advice, recommendation and consultation contained in the documents was provided for that purpose.

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<sup>3</sup> *Brog v Department of Premier and Cabinet* (1989) 3 VAR 201 at 208

<sup>4</sup> (1981) 1 AAR 1

Would disclosure of the documents be contrary to the public interest?

62. I have had regard to the following relevant factors when considering whether disclosure of the documents would be contrary to the public interest –

- (a) The right of every person to obtain access to documents under the FOI Act;
- (b) The degree of sensitivity of the issues involved in the deliberations;
- (c) The likelihood that disclosure would be likely to lead to confusion and ill-informed debate<sup>5</sup>;
- (d) The state of the policy development process when the documents were created;
- (e) The likelihood that disclosure would inhibit the independence of officers or the making of proper and detailed research and submissions;
- (f) The likelihood that disclosure would create mischief one way or another;
- (g) The significance of the documents<sup>6</sup>; and
- (h) The nature of the information and the nature of the documents.<sup>7</sup>

63. In its decision letter, the Agency stated that release of Documents 3 and 4 would be against the public interest because –

...it relates to an ongoing project that has not yet been finalised or put out to public tender... and could engender uninformed and unnecessary public debate in circumstances where the project is not yet finalised and its commercial and other objectives are still under review.

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<sup>5</sup> *Birrell v Department of State Development* [2001] VCAT 1258 at 15

<sup>6</sup> *Re Halls and Victorian Casino and Gaming Authority* (1998) 12 VAR 483

<sup>7</sup> *Friends of Mallacoota Inc v Department of Planning and Community Development* [2011] VCAT 1889 at 51

64. In his application for review, the Applicant stated that –

My appeal is based on the understanding that the Buller/Stirling Alpine Resort Management Board has used the business case as a final and formal document... [it] can no longer be considered “an internal working document.”

65. The Victorian Alpine Resorts Infrastructure Project List categorises the ‘Mt Buller – Mt Stirling Link Rd’ project in the ‘Tier 1: Business Case Stage’.

66. The Victorian Alpine Resorts Development Program (VARDP) policy provides that a project at the ‘business plan stage’, has ‘probable funding sources identified and ready to pursue’, a ‘detailed business case indicating project viability and strategic fit’, and planning, approvals and discussions at an advanced stage.

67. Although the Alpine Resorts Co-ordinating Council and the Agency have endorsed the project, I do not accept the Applicant’s submission that the business case ‘can no longer be considered “an internal working document”’. The business case is at a stage where ‘probable funding sources’ are identified, however, those sources may still be subject to further conditions.

68. In its submission, the Agency’s legal representative stated that –

Consideration of the Project is still underway and final options have not yet been resolved.

69. I am satisfied that the policy and project development detailed in Documents 3 and 4 is at an advanced stage, but that it is still subject to change. Accordingly, it is not a document that reflects the final decision of the Agency.

70. The Agency’s legal representative further submitted that –

...public disclosure of deliberative exercises might constrain and fetter dialogue and debate among board members in connection with those deliberative exercises. Board members should be free to consider all sorts of different options without the concern of being publicly scrutinised in that endeavour.

71. I note that this project has generated significant controversy from various interested groups and individuals. There is some opposition against the proposed construction of the road between Mount Buller and Mount Stirling. As a result, there is a heightened degree of sensitivity in the issues involved in the deliberations.
72. Considering the controversy surrounding the matter, I am of the view that disclosure of a document that does not reflect a final decision, could create mischief and lead to confusion or ill-informed debate.
73. Having considered all relevant factors, I am satisfied that disclosure of the matters in the nature of consultation, opinion, advice and deliberation contained in Documents 3 and 4 would be contrary to the public interest.

#### **Application of Section 34(4)**

74. The Agency applied section 34(4) to deny access, in full, to Documents 3 and 4.
75. Section 34(4) of the FOI Act provides –

#### **34 Documents relating to trade secrets**

(4) A document is an exempt document if—

(a) it contains—

- (i) a trade secret of an agency; or
- (ii) in the case of an agency engaged in trade or commerce—information of a business, commercial or financial nature—

that would if disclosed under this Act be likely to expose the agency unreasonably to disadvantage.

### Nature of Exemption

76. A document is considered to be an exempt document under section 34(4)(a) of the FOI Act, if –

- (a) The Agency is engaged in trade or commerce; and
- (b) The document contains information of a business, commercial or financial nature;
- (c) The disclosure of which, would be likely to expose the Agency unreasonably to disadvantage.

### Is the Agency engaged in trade or commerce?

77. The Agency is involved in planning for a project to construct a road between Mt Buller and Mt Stirling.

78. Accordingly, I am satisfied that the Agency is engaged in commerce.

### Do the documents contain information of a business, commercial or financial nature?

79. Document 3 contains a financial analysis, funding strategy and procurement assessment.

80. Document 4 contains various cost assumptions and cash flow analyses.

81. I am satisfied that this material is information of a business and financial nature.

Would disclosure be likely to expose the Agency unreasonably to disadvantage?

82. I note that, as stated by O'Bryan J in *Accident Compensation Commission v Croom*<sup>8</sup> –

...the word “disadvantage” in the context of trade or commerce and information of a business, commercial or financial nature means injury of a financial kind.

83. In *Asher v Department of Innovation, Industry and Regional Development*, Judge Bowman stated<sup>9</sup> –

Whilst “disadvantage” does not have to be proved strictly in terms of dollars and cents, it does not extend, for example, to embarrassment. The argument of the Department based upon damage to reputations is a nonsense.

84. The Agency’s legal representative submitted that –

The board has not yet tendered this project to contractors, and the release of this information would be likely to disadvantage the board in any future commercial negotiations...relevant financial parameters, contractual contingency amounts, profit margins, risk assessments, procurement options and procurement methodologies shows the Board’s intentions and contractual priorities.

85. In my view, it is an unreasonable disadvantage if disclosure of the documents would result in disadvantage in commercial negotiations.

86. The Agency’s legal representative further submitted that –

This information should not be released prior to commencing commercial negotiations with third parties, as such third parties could exploit that information to the Board’s disadvantage.

87. I am also of the view that it is an unreasonable disadvantage, if disclosure would expose the Agency to a risk of third parties exploiting the information disclosed.

88. Accordingly, I am satisfied that disclosure would be likely to expose the Agency unreasonably to disadvantage.

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<sup>8</sup> *Accident Compensation Commission v Croom* [1991] 2 VR 322 at 331.

<sup>9</sup> *Asher v Department of Innovation, Industry and Regional Development* [2005] VCAT 2702 at 25

## Application of Section 25

89. I am of the view that Document 3 contains material that is not exempt under the FOI Act.
90. Section 25 requires an agency or Minister to grant access to a copy of a document containing exempt or irrelevant material if it is practicable for the agency or Minister to delete the exempt or irrelevant material and if the applicant indicates that he or she would wish to have access to such a copy.
91. The Tribunal<sup>10</sup> has previously considered the concept of it being 'practicable' for an agency or Minister to delete exempt or irrelevant matter and grant access to the redacted copy of a document. The two necessary elements involve –
- (a) The ease with which the agency or Minister is able to make deletions to the document in order to make it not exempt; and
  - (b) The efficacy of the outcome of making such deletions, that is, whether the redacted document is meaningful.
92. It would not be difficult to delete exempt material from Document 3, however, as extensive portions of the document constitute exempt material, I am of the view that that the redacted document would not remain meaningful.
93. Accordingly, I am satisfied that it would not be practicable to disclose a copy of Document 3 edited pursuant to section 25 of the FOI Act.

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<sup>10</sup> *Honeywood v Department of Human Services* [2006] VCAT 2048

## Decision

My decision on the original request under review is that –

- (a) The Applicant be granted access, in part, to Document 1, with:
- the names of the occupants listed for the reasons, 'Staff accommodation for winter' or 'Staff accommodation', to be deleted pursuant to section 33(1) of the FOI Act;
  - the second name in the range '29/07/2015 30/07/2015', to be deleted pursuant to section 33(1) of the FOI Act;
  - the second name in the range '31/08/2014 1/09/2014', to be deleted pursuant to section 33(1) of the FOI Act;
  - all other personal affairs information to be released.
- (b) The Applicant be denied access, in full, to Document 3, pursuant to sections 30(1), 34(4)(a) and 25 of the FOI Act.
- (c) The Applicant be denied access, in full, to Document 4, pursuant to sections 30(1) and 34(4)(a) of the FOI Act.
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Michael Ison

**Acting Freedom of Information Commissioner**

23 December 2015