

Question:

Please supply a copy of all correspondence (including email, letters and minutes of meetings) between the Department of Health (and anyone within) and the group MPANI for the years 2024, 2025 and 2026 to date?

Response:

Under Regulation 12(4)(b) of the Environmental Information Regulations (EIR), we are refusing your request as it is manifestly unreasonable due to the anticipated burden on existing resources within the Department. A Public Interest Test was completed, and in our view, this did not suggest that this exception should not be applied. This is attached at Annex A for your information.

You may wish to consider resubmitting your request into a more manageable scope.

For example, you may wish to:

- Narrow the timeframe (e.g. to 6–12 months),
- Limit the request to specific topics (e.g. air pollution or a particular planning application),
- Identify specific correspondents or teams.

Date response issued: 11/08/2026
Reference Number: DoH/2026-0179

PUBLIC INTEREST TEST

Request

Supply a copy of all correspondence (including email, letters and minutes of meetings) between the Department of Health (and anyone within) and the group MPANI for the years 2024, 2025 and 2026 to date.

Exception sought

Environmental Information Regulations 2004 section 12(4)(b) – the request for information is manifestly unreasonable.

Explanation of exception:

A request can be manifestly unreasonable for two reasons: firstly, if it is vexatious and secondly where it would incur unreasonable costs for a public authority or an unreasonable diversion of resources.

Public Interest Test

Public Interest in Disclosure:

Under the Environmental Information Regulations (EIR), regulated by the Information Commissioner's Office (ICO), there is a legal presumption in favour of disclosing environmental information. However, exceptions can be applied for specific reasons which can be found in section 12 of the Environmental Information Regulations 2004.

There is general public interest in the openness and transparency of government, and disclosure of any relevant documents within the records management system of the Department would promote transparency and accountability and comply with the intention of the Environmental Information Regulations.

Disclosure of any information could also foster improvement in public understanding of the Department's roles and responsibilities regarding environmental health and inform on matters that affect local communities. Disclosure may also inform public debate, enhance public confidence in how the Department engages with other departments in developing policy, and there is also inherent value in enabling the public to better understand how policy evolves over time.

Public Interest in Maintaining the Exception:

A Public Interest Test was completed for the use of Environmental Information Regulation 12(4)(b), and in our view this did not suggest that this exception should not be applied.

Over 1,500 documents within the dates of the request were identified on our digital records management system as containing words pertaining to the request. These words included 'MPANI' and 'Mineral Products Association'. These figures do not represent documents that hold information relevant to the specific request but that they hold the key words searched for. However, all documents would have to be reviewed for relevancy.

The branch responsible for completing this request (which was established in May 2026) currently only has one member of staff who would be able to undertake the task. Due to the time required to undertake a search through all 1,500 documents, consider the relevancy of each to the request, potentially seek third party consultation if required, and redact all appropriate information, fulfilling the request would severely disrupt the branch's ability to perform its core function and duties.

It should also be noted for information that MPANI is affiliated to the Mineral Products Association (MPA). The MPA (UK-wide) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries and represent their members' interests on policy, planning and technical matters with government departments, local authorities, professional trade bodies and other key audiences at European, national and local levels. The Department of Health in Northern Ireland is not a statutory consultee for planning applications within the Northern Ireland planning process.

Balance of Public Interest

The Department recognises the importance of transparency and the legitimate public interest in issues relating to the environment however on balance, the Department has concluded that the public interest in maintaining the exception outweighs the public interest in disclosure at this time.

Decision

The Department has determined that the exception provided under Environmental Information Regulation 12(4)(b) is engaged. Following application of the Public Interest Test, the Department has concluded that the public interest favours maintaining the exception. The Department therefore refuses this request at this time.