

28/03/2024

Re: Freedom of Information request 202405 – Request Part-Granted.

Dear _____,

I refer to your request, dated and received on the 1st of February 2024 and extended on the 27th of February 2024, which you have made under the Freedom of Information Act 2014 (FOI Act) for records held by the Land Development Agency (the LDA).

You requested:

Pursuant to the Freedom of Information Act 2014, I hereby request access to records held by the Land Development Agency (LDA) concerning the tender process for the Cost Rental Application Software & Services, with the reference number 13th November 2023. This request is aimed at understanding the comprehensive evaluation process and the basis of the award decision.

The specific information requested includes:

1. **Detailed Scoring:** *A breakdown of the scoring for each category in the evaluation process for all bidders, including Bynaric.*
2. **Evaluators' Information:** *Names, roles, and the professional relationship of each evaluator with the winning bidder, Keyholder.*
3. **Selection Process for Inviting Tenders:** *Documentation detailing how and why Keyholder was invited to participate in this tender.*
4. **Communications with Keyholder:** *Any records of communication between LDA and Keyholder before, during, and after the tender process. This includes emails, letters, and memos.*
5. **Scheduled Demonstrations or Presentations:** *Records of any scheduled product demonstrations or presentations by Keyholder, including calendar entries, Teams, Zoom, or in-person meeting records, as well as any sign-in/out records at LDA facilities related to Keyholder.*
6. **Purpose and Outcomes of Meetings:** *The roles of participants and the reasons for any meetings with Keyholder, including any outcomes or decisions made as a result.*
7. **Keyholder's Tender Response:** *A copy of the tender response submitted by Keyholder, subject to redaction of commercially sensitive information.*

I wish to inform you that I have decided to Part-Grant your request on the 28th of March 2024.

The purpose of this letter is to explain that decision.

1. Findings, particulars and reasons for decisions to deny access.

Details of your request were provided to the relevant sections within the LDA to identify records held which were within the scope of your request.

The FOI Act 2014 provides that in certain circumstances, a public body may refuse the release of certain records or part thereof. As such a number of redactions have been applied to the attached records and some records were withheld from release. These redactions and records withheld are detailed in the Schedule of Records **Appendix 1**.

For clarity I will individually address each of the seven parts of your request.

Part 1

In respect of Part 1 of your request where you requested *Detailed Scoring: A breakdown of the scoring for each category in the evaluation process for all bidders, including Bynaric* I wish to inform you that I am refusing your request under section 36(1)(b) & 36(1)(c).

Section 36 states that:

Commercially Sensitive Information

36. (1) Subject to subsection (2), a head shall refuse to grant an FOI request if the record concerned contains

(b) financial, commercial, scientific or technical or other information whose disclosure could reasonably be expected to result in a material financial loss or gain to the person to whom the information relates, or could prejudice the competitive position of that person in the conduct of his or her profession or business or otherwise in his or her occupation, or

(c) information whose disclosure could prejudice the conduct or outcome of contractual or other negotiations of the person to whom the information relates.

I am satisfied that the release of information contained within these records would prejudice the competitive position of the supplier by making the proprietary information publicly known.

This information is therefore commercially sensitive in accordance with the provisions of section 36 of the Act.

Furthermore, I am mindful of the advice of the Information Commissioner in case 98188 that “unsuccessful tender information which is commercially sensitive generally remains confidential after the award of a contract, and the public interest lies in protecting that information from disclosure.”

I am cognisant of the fact that the release of certain information under the Act is, in essence, a release to the public at large. How each potential supplier scored in each category in their respective submissions to the LDA is not known to competitors or the public in general. If the records were made available to you it is reasonable to expect that it would prejudice the ability of the suppliers and others to compete in other contracts or negotiations in the future as competitors would be aware of their pricing structure and products.

I am of the view that the release of the scoring of the tender applications could reasonably be expected to result in a material financial loss by the applicants as it could prejudice their competitive position in the conduct of their business. The placing of the scoring into the public domain could also reasonably be expected to give a competitive advantage to other companies seeking similar contracts with public bodies.

The applicants’ current customers and / or competitors may become aware of specific needs of the LDA which could prejudice any current or future negotiations with these and other providers and undermine competitive procurement processes. I am also satisfied that the release of certain commercial information contained within these records would prejudice the competitive position of the LDA.

Therefore, I am refusing the release of the records under the provisions of section 36(1)(b) & 36(1)(c) as they contain commercially sensitive information.

Public Interest Test

There is a Public Interest Test associated with section 36 of the FOI Act whereby my decision must be made having fully considered the harm and public interest relevant to this request.

I have considered the public interest issues which arise in your request, and have taken account of the following factors in favour of release:

- Ensuring openness and transparency of organisational functions to the greatest possible extent.
- The public interest in members of the public exercising their rights under the FOI Act.
- That there is more than just a transitory interest by the public in this information being released.
- The right to commercial confidentiality is outweighed by the needs of the public.

In considering the public interest factors which favour withholding the records as detailed in part 1 of your request, I have taken account of the following:

- Allowing a public body to hold commercial information without undue access by members of the public.

- The public interest is not best served by releasing these records.
- That the LDA can conduct its commercial activities with external stakeholders in a confidential manner.
- That there is no overriding public interest that outweighs the individual's right to privacy in this case commercial activities.

Having balanced the public interest factors both for and against the release, I decided that the public interest in preserving the information and the reasonable expectation that information can be maintained in a confidential manner by the LDA outweighs the public interest which would be served were the detail released to you.

Part 2

In respect of Part 2 of your request where you requested *Evaluators' Information: Names, roles, and the professional relationship of each evaluator with the winning bidder; Keyholder* I wish to inform you that I am granting your request.

Details of this part of your request were provided to the relevant section within the LDA to identify records held which were within the scope of your request.

The information provided below has been abstracted from records held by the LDA's procurement department.

	Name	Role
Evaluator	Shani Gilbert	Letting Property Manager
Evaluator	Lucia Kelly	Senior Letting Manager
Reviewer	Enda McGuane	Head of Asset Management
Reviewer	Máiréad Monaghan	Letting Property Manager

Part 3

In respect of Part 3 of your request where you requested *Selection Process for Inviting Tenders: Documentation detailing how and why Keyholder was invited to participate in this tenderer* I wish to inform you that I am part- granting your request.

Details of this part of your request were provided to the relevant sections within the LDA to identify records held which were within the scope of your request. The attached records have been identified as relating to this request.

The Land Development Agency routinely redacts the email addresses and mobile phone numbers of personnel as these are part of the IT Security infrastructure.

Please note that under Section 38 of the FOI Act 2014, the LDA are required to consult with third parties to which information that comes under Sections 36 and 37 of the Act relates. I have carried out this consultation in accordance with the Act.

I wish to inform you that I am refusing a number of records in whole or in part in accordance with Section 36(1) and Section 37(1) of the FOI Act. These records are included in the Schedule of Records in **Appendix 1**.

Section 36-Commercially Sensitive Information

- (1) Subject to subsection (2), a head shall refuse to grant an FOI request if the record concerned contains*
- a) trade secrets of a person other than the requester concerned*
 - b) financial, commercial, scientific or technical or other information whose disclosure could reasonably be expected to result in a material financial loss or gain to the person to whom the information relates, or could prejudice the competitive position of that person in the conduct of his or her profession or business or otherwise in his or her occupation, or*
 - c) information whose disclosure could prejudice the conduct or outcome of contractual or other negotiations of the person to whom the information relates.*

Section 37-Personal Information

- (1) Subject to this section, a head shall refuse to grant an FOI request if, in the opinion of the head, access to the record concerned would involve the disclosure of personal information (including personal information relating to a deceased individual).*

Personal information is defined at Section 2 of the FOI Act and includes the following:

Section 2 -- Interpretation

2. (1) In this Act-

"personal information" means information about an identifiable individual that, either-

- (a) would, in the ordinary course of events, be known only to the individual or members of the family, or friends, of the individual, or*
- (b) is held by an FOI body on the understanding that it would be treated by that body as confidential,*

and, without prejudice to the generality of the foregoing, includes-

- (iii) information relating to the employment or employment history of the individual,*
- (v) information relating to the individual in a record falling within section 11(6)(a).*
- (vii) information relating to any criminal history of, or the commission or alleged commission of any offence by, the individual,*

Harm Test and Public Interest Test

There is a Harm Test and Public Interest Test associated with sections 36 and 37 of the FOI Act whereby my decision must be made having fully considered the public interest relevant to this request.

The Harm test has been considered and it is believed that the release of these documents will have a likely prejudice on the reasonable expectation that information provided to and held by the LDA can be maintained in a confidential manner, which outweighs the public interest that would be served were the records released to you.

I have considered the public interest issues which arise in your request and have taken account of the following factors in favour of release:

- Ensuring openness and transparency of organisational functions to the greatest possible extent.
- The public interest in members of the public exercising their rights under the FOI Act.
- That there is more than just a transitory interest by the public in this information being released.
- The right to privacy is outweighed by the needs of the public.

In considering the public interest factors which favour withholding the records, I have taken account of the following:

- The best course of action which is in the public interest with regard to these records.
- That the LDA can conduct its business with external stakeholders in a confidential manner.
- Maintaining the security infrastructure of the Agency's IT systems.
- Allowing a public body to hold commercially sensitive and personal information without undue access by members of the public.
- The public interest is not best served by releasing of these records.
- Protecting the flow of information to public bodies.
- Ensuring public bodies can carry out their duties without intrusion by the public.

Having reviewed the records for your request, I find there is no exceptional circumstance in this particular case that would warrant release of these particular records and therefore my decision is to find that the public interest is best served by refusal.

Part 4

In respect of Part 4 of your request where you requested *Any records of communication between LDA and Keyholder before, during, and after the tender process. This includes emails, letters, and memos* I wish to inform you that I am part- granting your request.

Details of part 4 of your request were provided to the relevant sections within the LDA to identify records held which were within the scope of your request.

I wish to inform you that I am refusing a number of records in whole or in part in accordance with Section 36(1) and Section 37(1) of the FOI Act. These records are included in the Schedule of Records in **Appendix 1**.

As already referenced in part 3 of this letter, the LDA as a matter of course, redacts the mobile phone numbers and email addresses of employees as these are part of the body's IT security management.

I am satisfied that a number of records include the Intellectual Property of a supplier and are therefore commercially sensitive information under the meaning of Section 36 (1)(a) and 36 (1)(b). Please note that under Section 38 of the FOI Act 2014, the LDA are required to consult with third parties to which information that comes under Sections 36(3) and 37(5)(a) of the Act relates. I have carried out this consultation in accordance with the Act.

Section 36-Commercially Sensitive Information

- (2) Subject to subsection (2), a head shall refuse to grant an FOI request if the record concerned contains*
- a) trade secrets of a person other than the requester concerned*
 - b) financial, commercial, scientific or technical or other information whose disclosure could reasonably be expected to result in a material financial loss or gain to the person to whom the information relates, or could prejudice the competitive position of that person in the conduct of his or her profession or business or otherwise in his or her occupation, or*
 - c) information whose disclosure could prejudice the conduct or outcome of contractual or other negotiations of the person to whom the information relates.*

Under the FOI Act, records are released without any restriction as to how they may be used and thus, release under the FOI Act, is in effect, and regarded as being released to the world at large. As a result, I am conscious of my obligations to retain commercial information in a confidential and secure manner and prevent commercially sensitive information from being released into the public domain unnecessarily.

Section 37-Personal Information

- (1) Subject to this section, a head shall refuse to grant an FOI request if, in the opinion of the head, access to the record concerned would involve the disclosure of personal information (including personal information relating to a deceased individual).*

Personal information is defined at Section 2 of the FOI Act and includes the following:

Section 2 -- Interpretation

2. (1) In this Act-

"personal information" means information about an identifiable individual that, either-

- (a) would, in the ordinary course of events, be known only to the individual or members of the family, or friends, of the individual, or*
- (b) is held by an FOI body on the understanding that it would be treated by that body as confidential, and, without prejudice to the generality of the foregoing, includes-*

(iii) information relating to the employment or employment history of the individual,

(v) information relating to the individual in a record falling within section 11(6)(a).

(vii) information relating to any criminal history of, or the commission or alleged commission of any offence by, the individual,

Harm Test and Public Interest Test

There is a Harm test and Public Interest Test associated with sections 36 and 37 of the FOI Act whereby my decision must be made having fully considered the public interest relevant to this request.

The Harm test has been considered and it is believed that the release of these documents will have a likely prejudice on the reasonable expectation that information provided to and held by the LDA can be maintained in a confidential manner, which outweighs the public interest that would be served were the records released to you.

I have considered the public interest issues which arise in your request and have taken account of the following factors in favour of release:

- Ensuring openness and transparency of organisational functions to the greatest possible extent.
- The public interest in members of the public exercising their rights under the FOI Act.
- That there is more than just a transitory interest by the public in this information being released.
- The right to privacy is outweighed by the needs of the public.

In considering the public interest factors which favour withholding the records, I have taken account of the following:

- The best course of action which is in the public interest with regards to these records.
- That the LDA can conduct its business with external stakeholders in a confidential manner.
- Protecting the security of the LDA's IT systems.
- Allowing a public body to hold commercially sensitive and personal information without undue access by members of the public.
- The public interest is not best served by releasing these records.
- Protecting the flow of information to public bodies.
- Ensuring public bodies can carry out their duties without intrusion by the public.

Having reviewed the records for your request, I find there is no exceptional circumstance in this particular case that would warrant release of these particular records and therefore my decision is to find that the public interest is best served by refusal.

Part 5

In respect of Part 5 of your request where you requested *Records of any scheduled product demonstrations or presentations by Keyholder, including calendar entries, Teams, Zoom, or in-person meeting records, as well as any sign-in/out records at LDA facilities related to Keyholder* I wish to inform you that I am granting your request.

Details of your request were provided to the relevant sections within the LDA to identify records held which were within the scope of your request.

The requested records are attached to this decision letter for your information.

Please note that the meeting held on the 11th of August 2023 was a preliminary market consultation in advance of the tender the purpose of which was to allow the LDA to communicate with the market and those who intended to engage with the LDA to gain more information and understanding of what was available on the market as well as refining the LDA's objectives.

Part 6

In respect of Part 6 of your request where you requested *The roles of participants and the reasons for any meetings with Keyholder, including any outcomes or decisions made as a result* I wish to inform you that I am part-granting your request.

Details of your request were provided to the relevant sections within the LDA to identify records held which were within the scope of your request.

I wish to inform you that I am part granting this section of your request subject to the redaction of a portion of a record in accordance with Section 37(1) of the FOI Act. These records are included in the Schedule of Records in **Appendix 1**.

The name of a staff member of a third party is redacted from the record as I am satisfied that this compromises of personal information for the purposes of the Act.

Section 37-Personal Information

(1) Subject to this section, a head shall refuse to grant an FOI request if, in the opinion of the head, access to the record concerned would involve the disclosure of personal information (including personal information relating to a deceased individual).

Personal information is defined at Section 2 of the FOI Act and includes the following:

Section 2 -- Interpretation

2. (1) In this Act-

"personal information" means information about an identifiable individual that, either-

(a) would, in the ordinary course of events, be known only to the individual or members of the family, or friends, of the individual, or

(b) is held by an FOI body on the understanding that it would be treated by that body as confidential,

and, without prejudice to the generality of the foregoing, includes-

(iii) information relating to the employment or employment history of the individual,

(v) information relating to the individual in a record falling within section 11(6)(a).

Harm Test and Public Interest Test

There is a Harm Test and Public Interest Test associated with section 37 of the FOI Act whereby my decision must be made having fully considered the public interest relevant to this request.

The Harm test has been considered and it is believed that the release of these documents will have a likely prejudice on the reasonable expectation that information provided to and held by the LDA can be maintained in a confidential manner, which outweighs the public interest that would be served were the records released to you.

I have considered the public interest issues which arise in your request and have taken account of the following factors in favour of release:

- Ensuring openness and transparency of organisational functions to the greatest possible extent.
- The public interest in members of the public exercising their rights under the FOI Act.
- That there is more than just a transitory interest by the public in this information being released.
- The right to privacy is outweighed by the needs of the public.

In considering the public interest factors which favour withholding the records, I have taken account of the following:

- The best course of action which is in the public interest with regard to these records.
- That the LDA can conduct its business with external stakeholders in a confidential manner.
- Allowing a public body to hold personal information without undue access by members of the public.
- The public interest is not best served by releasing of these records.
- Protecting the flow of information to public bodies.
- Ensuring public bodies can carry out their duties without intrusion by the public.

Having reviewed the records for your request, I find there is no exceptional circumstance in this particular case that would warrant release of these particular records and therefore my decision is to find that the public interest is best served by refusal.

Part 7

In respect of Part 7 of your request where you requested *A copy of the tender response submitted by Keyholder, subject to redaction of commercially sensitive information* I wish to inform you that I am part-granting your request.

Details of your request were provided to the relevant sections within the LDA to identify records held by us which were within the scope of your request.

I wish to inform you that I am refusing a number of records in whole or in part in accordance with Section 36(1) and Section 37(1) of the FOI Act. These records are included in the Schedule of Records in **Appendix 1**.

I am satisfied that this is commercially sensitive information as set out in the FOI Act. I am mindful of the Information Commissioners' guidance, that while each record must be considered on its own merits, that successful tender information loses its confidentiality in relation to price and quantity of a supplied good or service, it otherwise generally qualifies as commercially sensitive information for the purposes of Sections 36(1)(b) and (c) of the FOI

Act. Depending on the circumstances, product information can also be considered commercially sensitive under Section 36(1)(b). As information provided such as the capabilities and user interface of the software could allow a competitor to replicate the product, I am satisfied that this is commercially sensitive information.

Other successful tender information which is commercially sensitive (for example, details of the internal organisation of a tenderer's business, analysis of the requirements of the public body, or detailed explanations as to how the tenderer proposed to meet these requirements) may remain confidential. Disclosure in the public interest ordinarily would not be required, unless it were necessary to explain the nature of goods or services purchased by the public body.

Certain other information in these records is personal information as defined under the Act. Additionally, the LDA as a matter of course redacts the mobile phone numbers and email addresses of employees as these are part of the body's IT security management.

Section 36-Commercially Sensitive Information

(1) Subject to subsection (2), a head shall refuse to grant an FOI request if the record concerned contains

- a) trade secrets of a person other than the requester concerned*
- b) financial, commercial, scientific or technical or other information whose disclosure could reasonably be expected to result in a material financial loss or gain to the person to whom the information relates, or could prejudice the competitive position of that person in the conduct of his or her profession or business or otherwise in his or her occupation, or*
- c) information whose disclosure could prejudice the conduct or outcome of contractual or other negotiations of the person to whom the information relates.*

Section 37-Personal Information

(1) Subject to this section, a head shall refuse to grant an FOI request if, in the opinion of the head, access to the record concerned would involve the disclosure of personal information (including personal information relating to a deceased individual).

Personal information is defined at Section 2 of the FOI Act and includes the following:

Section 2 -- Interpretation

2. (1) *In this Act-*

"personal information" means information about an identifiable individual that, either-

(a) would, in the ordinary course of events, be known only to the individual or

members of the family, or friends, of the individual, or

(b) is held by an FOI body on the understanding that it would be treated by that body as confidential,

and, without prejudice to the generality of the foregoing, includes-

- (iii) information relating to the employment or employment history of the individual,*
- (v) information relating to the individual in a record falling within section 11(6)(a).*

Harm Test and Public Interest Test

There is a Harm test and Public Interest Test associated with sections 36 and 37 of the FOI Act whereby my decision must be made having fully considered the public interest relevant to this request.

The Harm test has been considered and it is believed that the release of these documents will have a likely prejudice on reasonable expectation that information provided to and held by the LDA can be maintained in a confidential manner, which outweighs the public interest that would be served were the records released to you.

I have considered the public interest issues which arise in your request and have taken account of the following factors in favour of release:

- Ensuring openness and transparency of organisational functions to the greatest possible extent.
- The public interest in members of the public exercising their rights under the FOI Act.
- That there is more than just a transitory interest by the public in this information being released.
- The right to privacy is outweighed by the needs of the public.

In considering the public interest factors which favour withholding the records, I have taken account of the following:

- The best course of action which is in the public interest with regard to these records.
- That the LDA can conduct its business with external stakeholders in a confidential manner.
- That the LDA can protect its IT Security infrastructure.
- Allowing a public body to hold commercially sensitive and personal information without undue access by members of the public.
- The public interest is not best served by releasing of these records.
- Protecting the flow of information to public bodies.
- Ensuring public bodies can carry out their duties without intrusion by the public.

Having reviewed the records for your request, I find there is no exceptional circumstance in this particular case that would warrant release of these particular records and therefore my decision is to find that the public interest is best served by refusal.

1. Right of Appeal

In the event that you are unhappy with this decision you may appeal against it. If you need to make such an appeal, you can do so by writing to the Freedom of Information Unit, the Land Development Agency, 2nd Floor, Ashford House, Tara Street, Dublin 2 or by e-mail to foi@lda.ie.

Please note that a fee applies. This fee has been set at €30 (€10 for a Medical Card holder). Payment should be made by way of bank draft, money order, postal order or personal cheque, and made payable to Head of Finance, Land Development Agency, 2nd Floor, Ashford House, Tara Street, Dublin 2.

Payment can be made by electronic means, using the following details:

The Land Development Agency DAC

IE61AIBK93101264101092

BIC: AIBKIE2D

You must ensure that your FOI reference number (**FOI 202405**) is included in the payment details.

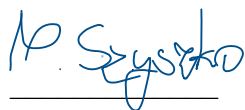
You should make your appeal within 4 weeks of the date of this notification, where a day is defined as a working day excluding the weekend and public holidays. However, the making of a late appeal may be permitted in appropriate circumstances. The appeal will involve a complete reconsideration of the matter by a more senior member of the staff of this body.

Please be advised that the Land Development Agency replies under the Freedom of Information Act may be released into the public domain via our website at lda.ie.

Personal details in respect of your request have, where applicable, been removed to protect confidentiality.

Should you have any questions or concerns regarding the above, please contact me by telephone on (01) 9103400.

Yours sincerely,



Monika Szyszko,

Senior Compliance Manager

Appendix 1: Schedule of Records

Requester name:		Request Re:202405			
Record number	Description of document	Deletions	Relevant section of FOI Act	Reasons for deletion	Decision Maker's decision
Part 1					
1	Part 1 Record 1 (2 pages)	Commercially sensitive information – entire document	Section 36	Commercially sensitive information	Refuse
2	Part 1 Record 2 (5 pages)	Commercially sensitive information – entire document	Section 36	Commercially sensitive information	Refuse
Part 2					
NA	NA – extracted in decision letter	NA – extracted in decision letter	NA	NA	Grant
Part 3					
3	Part 3 Record 1 (4 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
4	Part 3 Record 2 (2 pages)	Names, contact details of non-LDA personnel, emails and mobile numbers of LDA employees	Sections 37	Personal Information	Part-grant
5	Part 3 Record 3 (1 page)	Names, contact details of non-LDA personnel, emails and mobile numbers of LDA employees	Sections 37	Personal Information	Part-grant
6	Part 3 Record 4 (1 page)	Names, contact details of non-LDA personnel, emails and mobile numbers of LDA employees	Sections 37	Personal Information	Part-grant
7	Part 3 Record 5 (15 pages)	NA	NA	NA	grant
8	Part 3 Record 6 (15 pages)	NA	NA	NA	grant
9	Part 3 Record 7 (2 pages)	Names, contact details of non-LDA personnel, emails and mobile numbers of LDA employees	Sections 37	Personal Information	Part-grant
10	Part 3 Record 8 (3 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
11	Part 3 Record 9 (2 pages)	Names, contact details of non-LDA personnel, emails and mobile numbers of LDA employees	Sections 37	Personal Information	Part-grant
12	Part 3 Record 10 (2 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile	Sections 36, 37	Personal Information	Part-grant

		numbers of LDA employees, commercially sensitive material		Commercially sensitive	
13	Part 3 Record 11 (5 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
Part 4					
14	Part 4 record 1 (6 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
15	Part 4 record 2 (1 pages)	Names, contact details of non-LDA personnel	Sections 37	Personal Information	Part-grant
16	Part 4 record 3 2 (pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
17	Part 4 record 4 (7 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
18	Part 4 record 5 (4 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
19	Part 4 record 6 (9 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
20	Part 4 record 7 (6 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
21	Part 4 record 8 (7 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant

22	Part 4 record 9 (7 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
23	Part 4 record 10 (6 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
24	Part 4 record 11 (9 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
25	Part 4 record 12 (3 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
26	Part 4 record 13 (7 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
27	Part 4 record 14 (2 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
28	Part 4 record 15 (2 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
29	Part 4 record 16 (2 pages)	Names, contact details of non-LDA personnel, emails and mobile numbers of LDA employees	Sections 37	Personal Information	Part-grant
30	Part 4 record 17 (3 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
31	Part 4 record 18 (8 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant

32	Part 4 record 19 (1 page)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
33	Part 4 record 20 (1 page)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
34	Part 4 record 21 (1 page)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
35	Part 4 record 22 (4 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
36	Part 4 record 23 (5 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
37	Part 4 record 24 (5 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
38	Part 4 record 25 (3 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
39	Part 4 record 26 (1 page)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
40	Part 4 record 27 (2 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
41	Part 4 record 28 (1 page)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees,	Sections 36, 37	Personal Information Commercially sensitive	Part-grant

		commercially sensitive material			
42	Part 4 record 29 (2 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
43	Part 4 record 30 (2 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
44	Part 4 record 31 (6 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
45	Part 4 record 32 (5 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
46	Part 4 record 33 (5 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
47	Part 4 record 34 (4 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
48	Part 4 record 35 (1 page)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
49	Part 4 record 36 (1 page)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
50	Part 4 record 37 (1 page)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant

51	Part 4 record 38 (1 page)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
52	Part 4 record 39 (1 page)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
53	Part 4 record 40 (1 page)	Names, contact details of non-LDA personnel	Sections 37	Personal Information	Part-grant
54	Part 4 record 41 (1 page)	Names, contact details of non-LDA personnel	Sections 37	Personal Information	Part-grant
55	Part 4 record 42 (1 page)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
56	Part 4 record 43 (1 page)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
57	Part 4 record 44 (1 page)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
58	Part 4 record 45 (1 page)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
59	Part 4 record 46 (1 page)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
60	Part 4 record 47 (1 page)	Names, contact details of non-LDA personnel	Sections 37	Personal Information	Part-grant
61	Part 4 record 48 (1 page)	Names, contact details of non-LDA personnel	Sections 37	Personal Information	Part-grant
62	Part 4 record 49 (1 page)	Names, contact details of non-LDA personnel	Sections 37	Personal Information	Part-grant
63	Part 4 record 50 (1 page)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees,	Sections 36, 37	Personal Information Commercially sensitive	Part-grant

		commercially sensitive material			
64	Part 4 record 51 (1 page)	Names, contact details of non-LDA personnel,	Sections 37	Personal Information	Part-grant
65	Part 4 record 52 (1 page)	Names, contact details of non-LDA personnel	Sections 37	Personal Information	Part-grant
66	Part 4 record 53 (1 page)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
67	Part 4 record 54 (1 page)	Names, contact details of non-LDA personnel	Sections 37	Personal Information	Part-grant
68	Part 4 record 55 (1 page)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
69	Part 4 record 56 (1 page)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
70	Part 4 record 57 (3 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
71	Part 4 record 58 (2 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
72	Part 4 record 59 (2 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
73	Part 4 record 60 (3 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
74	Part 4 record 61 (2 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant

75	Part 4 record 62 (3 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
76	Part 4 record 63 (5 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
77	Part 4 record 64 (4 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
78	Part 4 record 65 (3 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
79	Part 4 record 66 (32 pages)	refuse	Section 36	Commercially sensitive	refuse
80	Part 4 record 67 (4 pages)	refuse	Section 36	Commercially sensitive	refuse
81	Part 4 record 68 (2 pages)	refuse	Section 36	Commercially sensitive	refuse
82	Part 4 record 69 (1 page)	refuse	Section 36	Commercially sensitive	refuse
83	Part 4 record 70 (7 pages)	refuse	Section 36	Commercially sensitive	refuse
84	Part 4 record 71 (6 pages)	refuse	Section 36	Commercially sensitive	refuse
85	Part 4 record 72 (6 pages)	refuse	Section 36	Commercially sensitive	refuse
86	Part 4 record 73 (6 pages)	refuse	Section 36	Commercially sensitive	refuse
87	Part 4 record 74 (1 page)	refuse	Section 36	Commercially sensitive	refuse
88	Part 4 record 75 (1 page)	refuse	Section 36	Commercially sensitive	refuse
89	Part 4 record 76 (1 page)	refuse	Section 36	Commercially sensitive	refuse
90	Part 4 record 77 (1 page)	refuse	Section 36	Commercially sensitive	refuse
91	Part 4 record 78 (1 page)	refuse	Section 36	Commercially sensitive	refuse
92	Part 4 record 79 (1 page)	refuse	Section 36	Commercially sensitive	refuse
93	Part 4 record 80 (1 page)	refuse	Section 36	Commercially sensitive	refuse
94	Part 4 record 81 (1 page)	refuse	Section 36	Commercially sensitive	refuse

95	Part 4 record 82 (2 pages)	refuse	Section 36	Commercially sensitive	refuse
96	Part 4 record 83 (1 page)	refuse	Section 36	Commercially sensitive	refuse
97	Part 4 record 84 (1 page)	refuse	Section 36	Commercially sensitive	refuse
98	Part 4 record 85 (1 page)	refuse	Section 36	Commercially sensitive	refuse
99	Part 4 record 86 (21 pages)	refuse	Section 37	Personal Information	refuse
100	Part 4 record 87 (7 pages)	refuse	Section 37	Personal Information	refuse
101	Part 4 record 88 (4 pages)	refuse	Section 37	Personal Information	refuse
102	Part 4 record 89 (5 pages)	refuse	Section 37	Personal Information	refuse
103	Part 4 record 90 (6 pages)	refuse	Section 37	Personal Information	refuse
104	Part 4 record 91 (2 pages)	refuse	Section 37	Personal Information	refuse
105	Part 4 record 92 (6 pages)	refuse	Section 37	Personal Information	refuse
106	Part 4 record 93 (4 pages)	refuse	Section 37	Personal Information	refuse
107	Part 4 record 94 (4 pages)	refuse	Section 37	Personal Information	refuse
108	Part 4 record 95 (2 pages)	refuse	Section 37	Personal Information	refuse
109	Part 4 record 96 (4 pages)	refuse	Section 37	Personal Information	refuse
110	Part 4 record 97 (3 pages)	refuse	Section 37	Personal Information	refuse
111	Part 4 record 98 (1 page)	refuse	Section 37	Personal Information	refuse
112	Part 4 record 99 (1 page)	refuse	Section 37	Personal Information	refuse
113	Part 4 record 100 (1 page)	refuse	Section 37	Personal Information	refuse
114	Part 4 record 101 (1 page)	refuse	Section 37	Personal Information	refuse
115	Part 4 record 102 (2 pages)	refuse	Section 37	Personal Information	refuse
116	Part 4 record 103 (3 pages)	refuse	Section 37	Personal Information	refuse
117	Part 4 record 104 (2 pages)	refuse	Section 37	Personal Information	refuse
118	Part 4 record 105 (6 pages)	refuse	Section 37	Personal Information	refuse
119	Part 4 record 106 (4 pages)	refuse	Section 37	Personal Information	refuse
120	Part 4 record 107 (1 page)	refuse	Section 37	Personal Information	refuse
121	Part 4 record 108 (1 page)	refuse	Section 37	Personal Information	refuse
122	Part 4 record 109 (4 pages)	refuse	Section 37	Personal Information	refuse

123	Part 4 record 110 (1 page)	refuse	Section 37	Personal Information	refuse
124	Part 4 record 111 (21 pages)	refuse	Section 37	Personal Information	refuse
125	Part 4 record 112 (3 pages)	refuse	Section 37	Personal Information	refuse
126	Part 4 record 113 (39 pages)	refuse	Section 37	Personal Information	refuse
127	Part 4 record 114 (2 pages)	refuse	Section 37	Personal Information	refuse
128	Part 4 record 115 (39 pages)	refuse	Section 37	Personal Information	refuse
129	Part 4 record 116 (2 pages)	refuse	Section 37	Personal Information	refuse
130	Part 4 record 117 (2 pages)	refuse	Section 37	Personal Information	refuse
131	Part 4 record 118 (2 pages)	refuse	Section 37	Personal Information	refuse
132	Part 4 record 119 (2 pages)	refuse	Section 37	Personal Information	refuse
133	Part 4 record 120 (2 pages)	refuse	Section 37	Personal Information	refuse
134	Part 4 record 121 (1 page)	refuse	Section 37	Personal Information	refuse
135	Part 4 record 122 (2 pages)	refuse	Section 37	Personal Information	refuse
136	Part 4 record 123 (1 page)	refuse	Section 37	Personal Information	refuse
137	Part 4 record 124 (2 pages)	refuse	Section 37	Personal Information	refuse
138	Part 4 record 125 (1 page)	refuse	Section 37	Personal Information	refuse
Part 5					
139	Part 5 record 1 (1 page)	NA	NA	NA	Grant
Part 6					
140	Part 6 record 1 (2 pages)	Name and email address of non-LDA personnel	Section 37	Personal information	Part grant
141	Part 6 record 2 (1 page)	NA	NA	NA	Grant
142	Part 6 record 3 (1 page)	NA	NA	NA	Grant
Part 7					
143	Part 7 Record 1 (6 pages)	refuse	Section 36	Commercially sensitive	refuse
144	Part 7 Record 2 (8 pages)	Names, emails and phone numbers of non-LDA personnel, emails and mobile numbers of LDA employees, commercially sensitive material	Sections 36, 37	Personal Information Commercially sensitive	Part-grant
145	Part 7 record 3 (1 page)	refuse	Section 36	Commercially sensitive	refuse
Total number of pages					561
Total number of pages for full release					62
Total number of pages for partial release					189
Total number of pages being withheld					310