

Dear Sir/Madam,

Pursuant to section 43 of the *Freedom of Information Act 1992 (WA)* (the Act), I request an internal review of the decision issued by Ms Courtney Taylor on 8 September 2025 in relation to FOI2025-017.

I seek this review on the following grounds.

## Ground 1 – Misconstruction of Scope

The decision interprets my request as limited to documents “specifically relating to DIs which is separate to that for General Inspectors”. This is an unreasonably narrow and illogical construction.

- Legal/operational position: Designated Inspectors (DIs) are a subclass of General Inspectors under the Animal Welfare Act 2002. Any SOP, policy, or risk assessment that governs General Inspectors necessarily governs DIs.
- FOI principle: Where documents exist that partly fall within scope, the agency is required to provide edited copies (s.24), not exclude them outright. GI-level documents containing DI content are plainly within scope.

I therefore request that the review consider all GI-level documents that refer to or govern DIs, and provide edited copies where appropriate.

## Ground 2 – Inadequate Searches

The decision asserts that “reasonable searches” were undertaken, but does not particularise custodians, systems, or search terms. This is insufficient.

I request that the review:

- Identify the **custodians** searched (e.g. Animal Welfare Policy, Operations & Compliance, Governance & Standards, Ministerial Liaison Unit, AWAC secretariat, Office of the DG/Deputy DG).
- Identify the **systems** searched (Objective Nexus, Ministerial brief logs, risk registers, Outlook/Exchange).
- Identify the **keywords** used (“designated inspector”, “DI”, “designate\*”, “general inspector”, “AWAC”, “brief/ministerial/committee”, “SOP/guideline/manual”, “risk”, “audit”, “compliance”, “record-keeping”, “reporting”).

Without this detail it is impossible to accept that “all reasonable steps” were taken as required by s.26.

## Ground 3 – AWAC Holdings

The decision claims DPIRD does not hold AWAC documents because AWAC is an independent body. This is insufficient.

- It is unclear whether DPIRD provides secretariat or administrative support to AWAC. If so, DPIRD may hold agendas, minutes, or correspondence.
- If DPIRD does not hold such documents, it should identify the relevant holding authority or consider a transfer under s.15.

The review should clarify DPIRD’s actual role in supporting AWAC and whether AWAC-related documents are held in DPIRD systems.

## Ground 4 – Procedural Fairness

The decision dismisses my request for explicit confirmation (in the event of no documents) as “out of scope”. This mischaracterises the request.

- I did not seek creation of new documents; I sought explicit confirmation of a search outcome.
- Providing a written s.26 statement is consistent with procedural fairness and with the duty to assist under s.11.

The review should require DPIRD to provide such explicit confirmations where no documents are held.

## Strategic Context

This decision cannot be considered in isolation.

- FOI2025-008 (now before the OIC) revealed a vacuum of enforcement outcome records.
- FOI2025-017 now reveals, through its narrow reasoning, an apparent vacuum of governance records (SOPs, risk assessments, AWAC oversight).
- FOI2025-022 (pending) concerns ministerial briefings and external integrity engagement.

Together, these applications reveal systemic accountability failure: **no records of outcomes, no records of governance, no records of reporting**.

This pattern will be drawn to the attention of the OIC and Ombudsman as evidence of a broader maladministration risk.

## Outcome Sought

I request that the original decision be set aside and that:

- 1. DPIRD re-process the application using a reasonable construction of scope, including GI-level documents with DI content, providing edited copies as required.
- 2. DPIRD disclose search methodology (custodians, systems, keywords) to demonstrate reasonable steps were taken.
- 3. DPIRD clarify whether it holds AWAC documents via secretariat/administrative support, or identify the responsible holding authority.
- 4. DPIRD provide explicit written confirmations where no documents are held, consistent with s.26.

Kind regards,

Hanyu

----- Original -----

**From:** FOI <FOI@dpiird.wa.gov.au>  
**Date:** Mon, Sep 8, 2025 4:47 PM  
**To:** helloluna520@gmail.com <helloluna520@gmail.com>  
**Cc:** FOI <FOI@dpiird.wa.gov.au>  
**Subject:** Re: FOI2025-017 - Notice of Decision

OFFICIAL

Good afternoon Hanyu

I refer to your access application (**FOI2025-017**) lodged on the 10 July 2025 with the Department of Primary Industries and Regional Development (DPIRD).

Please find attached a Notice of Decision in relation to your application.

If you have any queries, please contact me using the details below.

Kind regards

**Clare Kuzimski** | Privacy and Information Access Officer

Enterprise Information Management

Information Services | Corporate Services

Department of Primary Industries and Regional Development

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Onsite: Mon, Weds and Fri Remote: Tues and Thurs

FOI2025-017 - Notice of Decision (A14608396) - View



Department of  
Primary Industries and  
Regional Development

Protect  
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DPIRD acknowledges the Traditional Custodians of Country, the Aboriginal people of the many lands that we work on and their language groups throughout Western Australia and recognise their continuing connection to the land and waters.

We respect their continuing culture and the contribution they make to the life of our regions and we pay our respects to their Elders past, present and emerging.

Artwork: “Kangaroos going to the Waterhole” by Willarra Barker.

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