Request for Internal Review — FOI2025-049 (Designated Inspector)

Please accept this email as a formal request for internal review of the decision issued on 13 October 2025 under *section 44* of the *Freedom of Information Act 1992 (WA)*.

Dear Sir/Madam,

I am writing to request an internal review of the decision issued on 13 October 2025 concerning my access application Ref. FOI2025-049.

The decision refused access under section 26 of the *Freedom of Information Act 1992 (WA)* on the grounds that all reasonable steps had been taken to find the requested documents and that such documents do not exist.

I respectfully submit that this conclusion is based on an unduly narrow interpretation of scope and an inadequate search methodology, and therefore should be reconsidered.

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1. The Search Was Founded on an Unreasonably Narrow Interpretation of Scope

The decision appears to have limited the search to documents that explicitly and exclusively refer to "Designated Inspectors (DIs)".

However, the decision notice itself (paras 16 and 24) correctly identifies DIs as a subclass of General Inspectors under the *Animal Welfare Act 2002 (WA)*.

As such, the governance, performance, risks, and oversight of the DI program are inherently encompassed within the broader governance of the **Animal Welfare Inspectorate**.

Documents concerning the inspectorate's operations, briefings to Ministers, or communications with integrity agencies therefore fall within the ordinary meaning of the request.

To exclude such documents is an error of interpretation that renders the search incomplete.

2. The Search Methodology Was Consequently Flawed and Inadequate

The decision states that searches were conducted using keywords such as "designated inspector" and "designated inspection risk".

A reasonable search for ministerial or inter-agency accountability records would not be limited to those precise terms.

Documents relevant to the inspectorate's performance or oversight are likely to exist under broader descriptors such as:

- "animal welfare inspectorate"
- "animal welfare enforcement"
- "compliance performance report"
- "ministerial briefing animal welfare"
- "animal welfare risk assessment"

The absence of such search terms, and the lack of evidence that key custodians (e.g., Ministerial Liaison, Animal Welfare Policy, Compliance and Inspection branches) were consulted, indicates that **not all reasonable steps** were taken as required by section 26(1)(b)(ii) and the *OIC Reasonable Search Guidelines*.

3. The Decision's Implications Are Inherently Unlikely and Contrary to Good Administration

The decision implies that since 1 January 2022, DPIRD has:

- issued no ministerial or parliamentary briefings concerning the inspectorate's performance;
- held no correspondence or reporting with the OAG or Ombudsman regarding enforcement data gaps or risks; and
- recorded no formal risk assessments for this statutory function.

Such a total absence of accountability documentation would represent a **material governance anomaly**.

A more plausible explanation is that relevant records exist within broader functional categories (e.g., "General Inspectorate" or "Animal Welfare Compliance") but were not captured due to the narrow search scope.

4. Recordkeeping Obligations Under the State Records Act 2000

Under section 16(2)(b) of the *State Records Act 2000 (WA)*, DPIRD is required to "properly and adequately record the performance of the organisation's functions".

If no records exist for ministerial briefings or oversight reporting on the inspectorate, this raises questions about compliance with DPIRD's approved **Recordkeeping Plan**.

I therefore request that the reviewer confirm whether the RKP includes provisions for ministerial briefings, inspectorate operations, or risk management records, and whether these systems were searched.

5. Requested Outcome of Review

I respectfully request that:

- The decision of 13 October 2025 be set aside;
- A fresh, independent review be undertaken using **a broader and function-based search** (not merely a keyword search); and
- The scope explicitly include documents concerning the **Animal Welfare Inspectorate** as a whole, as this necessarily includes the DI function.

Thank you for your consideration. I look forward to receiving the outcome within the statutory timeframe.

Kind regards,
Hanyu Liu

---------- Original ----------
From: FOI <FOI@dpird.wa.gov.au>
Date: Mon, Oct 13, 2025 4:27 PM
To: Hanyu <liuhanyu2023@gmail.com>
Cc: FOI <FOI@dpird.wa.gov.au>
Subject: Re: FOD005-049 | Freedom of Information - Notice of Decision

OFFICIAL

Good afternoon, Hanyu

Please find attached the Notice of Decision for your Freedom of Information application (our ref: FOI2025-049) lodged with the Department of Primary Industries and Regional Development (DPIRD).

If you have any queries, please don't hesitate to contact me using the details below.

Thank you

Kind Regards

Courtney Taylor | A/Privacy and Information Access Coordinator
Enterprise Information Management
Department of Primary Industries and Regional Development
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Chat with me on Teams!

	Mon	Tue	Wed	Thur	Fri
Work Location	Office	Office	Home	Office	Office
	Office	Office	Home	Office	Office

Part-Time Hours