## 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).

requested documents and that such documents do not exist.

Interpretation of Scope

incomplete.

Inadequate

"animal welfare inspectorate"

"animal welfare enforcement"

"compliance performance report"

"inspectorate risk assessment"

"ministerial briefing animal welfare"

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

of scope and an inadequate search methodology, and therefore should be reconsidered.

1. The Search Was Founded on an Unreasonably Narrow

I respectfully submit that this conclusion is based on an unduly narrow interpretation

## 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

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

inherently encompassed within the broader governance of the Animal Welfare

2. The Search Methodology Was Consequently Flawed and

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

## be limited to those precise terms. Documents relevant to the inspectorate's performance or oversight are likely to exist under broader descriptors such as:

A reasonable search for ministerial or inter-agency accountability records would not

The absence of such search terms, and the lack of evidence that key custodians

branches) were consulted, indicates that not all reasonable steps were taken as

(e.g., Ministerial Liaison, Animal Welfare Policy, Compliance and Inspection

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

issued no ministerial or parliamentary briefings concerning the

held no correspondence or reporting with the OAG or Ombudsman

Such a total absence of accountability documentation would represent a material

A more plausible explanation is that relevant records exist within broader functional

categories (e.g., "General Inspectorate" or "Animal Welfare Compliance") but were

recorded no formal risk assessments for this statutory function.

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

regarding enforcement data gaps or risks; and

inspectorate's performance;

not captured due to the narrow search scope.

whether these systems were searched.

governance anomaly.

2000

4. Recordkeeping Obligations Under the State Records Act

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

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".

5. Requested Outcome of Review I respectfully request that:

A fresh, independent review be undertaken using a broader 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

function-based search (not merely a keyword search); and

The decision of 13 October 2025 be set aside;

## ----- Original ------

From: FOI < FOI@dpird.wa.gov.au> Date: Mon, Oct 13, 2025 4:27 PM To: Hanyu < helloluna520@gmail.com > Cc: FOI < FOI@dpird.wa.gov.au >

Good afternoon, Hanyu

Thank you

Kind Regards

and Regional Development (DPIRD).

**Enterprise Information Management** 

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Tue

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Level 12, 140 William Street, Perth WA 6000

Wed

statutory timeframe.

Kind regards,

Hanyu Liu

**OFFICIAL** 

Please find attached the Notice of Decision for your Freedom of Information

Courtney Taylor | A/Privacy and Information Access Coordinator

Department of Primary Industries and Regional Development

**Thur** 

Office

Fri

Office

application (our ref: FOI2025-049) lodged with the Department of Primary Industries

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

Subject: Re: FOI2025-049 | Freedom of Information - Notice of Decision

Chat with me on Teams! Mon

Work

Location

waters.

Department of

person(s) to whom it is addressed as it may be confidential and contain legally privileged information. If you are not the intended recipient you are hereby notified that any perusal, use, distribution, copying or disclosure is strictly prohibited. If you have received this email in error, please immediately advise us by return email and delete the email document. This email and any attachments to it are also subject to copyright and any unauthorised reproduction, adaptation or

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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

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. DISCLAIMER: The information contained in this email (including attachments) is intended only for the use of the transmission is prohibited. This notice should not be removed.