



Department of  
**Agriculture, Environment  
and Rural Affairs**

An Roinn

**Talmhaíochta, Comhshaoil  
agus Gnóthaí Tuaithe**

Department of

**Fairmin, Environment  
an' Kintra Matthers**

[www.daera-ni.gov.uk](http://www.daera-ni.gov.uk)

Our reference: DAERA 25/501

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Waste Permitting Team  
Lisburn NIEA  
17 Antrim Road  
Lisburn  
BT28 3AL

Tel: 02890569596

Email: [daera.informationmanager@daera-ni.gov.uk](mailto:daera.informationmanager@daera-ni.gov.uk)

3rd October 2025

Dear [REDACTED]

### **The Environmental Information Regulations (EIRs) 2004**

With regard to your *request for information received by the Department* on the 8<sup>th</sup> September 2025 which sought the following information:

#### **EIR Information Requested:**

Subject: EIR Request – Environmental Monitoring and Inspection Records: Lisbane Landfill, Tandragee

Under the Environmental Information Regulations 2004 (EIR), I am requesting recorded information regarding site monitoring, inspections, and environmental performance at Lisbane Landfill, Lisbane Road, Tandragee, County Armagh.

This request aims to support transparency around environmental oversight and potential impacts from waste operations on the local community.

If you are deaf or have a hearing difficulty you can contact the Department via the Next Generation Text Relay Service by dialling 18001 + telephone number.

**INVESTORS IN PEOPLE**  
We invest in people Standard

Please provide the following, covering approximately the last 10 years, or the available data range:

1. Inspections and Oversight
  - o Records of site inspections, monitoring visits, and compliance checks.
  - o Any reports from external consultants, contractors, or independent auditors engaged in regulatory inspections or assessments.
2. Environmental Monitoring Data
  - o Groundwater and leachate monitoring data (summaries and raw data if available).
  - o Air quality and odour monitoring data, including any mitigation measures in place.
  - o Environmental performance reports submitted by the operator or required by NIEA.
  - o Relevant correspondence or evaluations concerning environmental impact.
3. Hazardous Waste Records
  - o Any specific records or assessments related to hazardous waste management, including asbestos if applicable.

Please provide the information in electronic format (e.g. PDF, spreadsheet) where possible. I am happy to accept phased disclosure if needed.

I would appreciate confirmation of receipt of this request, along with the expected timeframe for your response. If you withhold any information, please state the relevant exemption(s) and reasoning.

Yours faithfully,

██████████

I can advise that the Department has completed its search and can confirm that it holds the information you have requested.

Unfortunately, the Department has determined your request to be Manifestly Unreasonable, on the grounds of cost and considered Regulation 12 (4) (b) of the Environmental Information Regulations to be engaged. As part of the legislation the Department is required to consider the public interest in disclosure, therefore a Public Interest Test has been conducted and is attached below this letter as Annex A for your information.

In summary, the Department has determined the cost to retrieve, review and extract documents associated would cost the Department an estimated £2,728.33, although this is likely to be much higher.

A table has been provided below detailing how the Department has reached this decision.

The NIEA has identified at least 3,274 records relating to the Lisbane landfill , that would be relevant under your very wide information request. The time required to

review each record will vary based on the relevant details requested for each record. An estimated 2 minute review time has been used for the cost calculation of reviewing each record, however, the average time will likely be higher.

Number of potential records identified	Time to review each record and extract information	Time taken @ £25/hr of staff time	Total
3274 records	3274 x 2 minutes = 6,548 minutes	6548/60 = 109.13 hours x £25 =	£2,728.33

The Department will consider a refined request which is more manageable and, therefore, not manifestly unreasonable. For example you could request the annual reports for the past 5 years – these include monitoring results and other information.

If you require any clarification, believe any part of your request has been overlooked, misunderstood or misinterpreted, please contact me in the first instance to see if it is a matter that can be resolved.

If you are unhappy with the manner in which your request for information has been handled or the decision to release/withhold information, you have the right to request a formal review by the Department.

If you wish to do so, please contact The Review Section either by e-mailing [daera.informationmanager@daera-ni.gov.uk](mailto:daera.informationmanager@daera-ni.gov.uk) or by post at The Department of Agriculture, Environment and Rural Affairs, Data Protection & Information Management Branch, Floor 2, Jubilee House, 111 Ballykelly Road, Ballykelly, Limavady BT49 9HP, within two months from the date of this letter.

If after such an internal review you are still unhappy with the response, you have the right to appeal to the Information Commissioner at Wycliffe House, Water Lane, Wilmslow, CHESHIRE, SK9 5AF, who will undertake an independent review of the Department's decision.

Yours sincerely,

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████████████████████

## APPENDIX A

### Public Interest Test – Environmental Information Regulations

#### Reference Number – DAERA/25-501

#### Requested Information:

Subject: EIR Request – Environmental Monitoring and Inspection Records: Lisbane Landfill, Tandragee

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#### Exemption / Exceptions under consideration

Regulation 12(4)(b) – Manifestly Unreasonable

### **Reasons why the public interest would favour disclosure:**

- Everyone has the right to access environmental information.

Disclosure of the information would provide confidence that the regulators decision making processes have been carried out fairly and without fear or favour.

### **Reasons why the public interest would favour withholding:**

- Complying with the volume of information requested would apply an unjustified level of disruption to staff already working in difficult circumstances due to already busy workloads.
- Searching at least 3274 records would commit excessive time and resources at a time when the Department is facing other committing priorities.

### **Conclusion**

Following consideration of the Public Interest Test, the Department has decided that it would not be in the public interest to fulfil the request made by the requestor. The Department considers this to be manifestly unreasonable based on the cost and burden of dealing with the request and consequent diversion of resources in dealing with this query. Advice has been provided to refine the request.

[REDACTED]