



Foreign &
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Vicky Cann
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31 July 2017

Dear Ms Cann

FREEDOM OF INFORMATION ACT 2000 - REQUEST REF: 0648-17

Thank you for your emails of 3rd and 5th of July asking for information under the Freedom of Information Act (FOIA) 2000. You asked:

03 July 2017 13:36

Memos and reports on EU securitisation dossiers discussions in Council

"I would like to receive all reports / memos made by officials from the UK Government which reported on Council discussions on either of the following dossiers: "Common rules on securitisation and creating a European framework for simple, transparent and standardised securitisation" and "the proposal amending Regulation (EU) No 575/2013 on prudential requirements for credit institutions and investment firms"."

03 July 2017 13:37

Proposals for amendment on EU securitisation dossiers

"I would like to request a copy of all proposals for amendment made by the UK Government on "Common rules on securitisation and creating a European framework for simple, transparent and standardised securitisation" and on "the proposal amending Regulation (EU) No 575/2013 on prudential requirements for credit institutions and investment firms"."

05 July 2017 17:52

Lobby contacts on EU securitisation dossiers

"Thanks for your reply. Since 1 Jan 2017 would be a suitable starting point for this request."

"I would like to request all emails, letters, briefing papers, between the following lobby organisations and the UK Government, and all agendas and minutes of meetings which included the following lobby organisations on "Common rules on securitisation and creating a European framework for simple, transparent and standardised securitisation" and "the proposal amending Regulation (EU) No 575/2013 on prudential requirements for credit institutions and investment firms". The list of lobby organisations are:

- Prime Collateralised Securities (PCS) UK Limited*
- Association for Financial Markets in Europe*
- The Alternative Investment Management Association Limited*
- Bank of America Merrill Lynch*
- EuroABS Limited*
- British Bankers' Association*
- Arch Mortgage Insurance plc*
- AXA Investment Managers*
- The Society of Motor Manufacturers and Traders (SMMT)*
- HSBC*
- Barclays*
- Lloyds Group*
- Jaguar*
- Vauxhall Motors"*

I can confirm that the FCO does hold information relevant to your request.

Section 12 of the Freedom of Information Act makes provision for public authorities to refuse requests for information where the cost of dealing with them would exceed the appropriate limit. The limit has been specified in the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004. For central government the appropriate limit is set at £600. This represents the estimated cost of one or more persons spending 3 ½ working days in determining whether the Department holds the information, and locating, retrieving and extracting it. Your request as presently formulated is widely-framed and I estimate that it will take more than 3 ½ working days to locate, retrieve and extract this information. In these circumstances we are not obliged under the Act to comply with your request. You may therefore wish to refine your request to narrow its scope to bring it within the appropriate limit.

Our initial searches indicate that your requests engage the cost limit due to the number of records which would need to be examined to identify relevant information.

It may be that if you were to narrow your requests, for example, by providing a more specific date range and being more specific about the type of information that you are interested in, we may be able to help you. This would allow us to conduct a targeted search of our records which may narrow the request sufficiently to bring it in under the cost exemption. However, I cannot guarantee that this would be the case. We estimate that a reduced time frame to 2017 only might still engage the cost limit. Please be aware that, even if you are able to narrow your request to bring it within the cost limit, it is possible that some information may still be withheld under other exemptions.

The Information Commissioner's Office (ICO) has published guidance on the aggregation of requests and you may wish to consult this before deciding whether and when to submit further requests. Please see paragraphs 39 to 51 in the guidance at the link below:

https://ico.org.uk/media/for-organisations/documents/1199/costs_of_compliance_exceeds_appropriate_limit.pdf

Please note that any new request will be given a separate reference number and we will then consider whether we can provide the information requested within the appropriate cost limit. This would of course be subject to the consideration of whether any of the other exemptions under the FOI Act apply.

If you would like to request a review of our decision, or if you wish to make a complaint, please write to the FOI and DPA Team at Room K4.04, King Charles Street, London SW1A 2AH, or by e-mail to foi-dpa.imd@fco.gov.uk. Please note that you have 40 working days from the date of this letter in which to submit a request for an internal review.

You can apply directly to the Information Commissioner. However, the Information Commissioner will not normally make a decision unless you have first exhausted the complaints procedure provided by the FCO. The Information Commissioner can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Yours sincerely,

ECOFIN Section, UK Representation to the EU



We keep and use information in line with the Data Protection Act 1998. We may release this personal information to other UK government departments and public authorities.