



OIA23-0294

20 June 2023

Shane Gibson  
fyi-request-22605-1e4e671b@requests.fyi.org.nz

Dear Shane Gibson

Thank you for your email of 25 May 2023 requesting information relating to a response to your previous information request (our reference: OIA23-0231). Your new request has been considered under the Official Information Act 1982 (OIA).

In your email of 25 May, you asked the following questions:

- *What financial system are you currently using which means you are not able to easily export this information?*
- *What is the estimated effort to make this data available?*
- *Where is the main complexity or effort which will result in the substantial effort to provide it?*

You previously requested that the Ministry for Primary Industries (MPI) supply you with data on all payments made during the 2021/2022 financial year. MPI declined your request under section 18(f) of the OIA because of the substantial collation and research that would have been required to respond to your request. Our decision to refuse was based on several reasons, which we will explain.

MPI makes thousands of individual payments every financial year. To complete your request, MPI would need to review every payment made over the last financial year prior to releasing that information to you. We would need to consult with our vendors and other payees to determine whether this information could be released to you. It may be commercially prejudicial, subject to an obligation of confidence, or be unable to be released for another reason.

For your reference, we defined 'collation' as being the cumulative body of work required to retrieve specified records and incorporate them into a finalised document form whereby release decisions can then be made.

MPI is a large organisation, and for the period covered by your request, we paid over 31,000 invoices to 4,540 payees. MPI uses products from 'Technology One' to manage our finances. Our systems are able to output a list of all payments made during the 2021/2022 financial year.

Using a definition of 'supplier' to mean 'companies and organisations MPI receives goods and services from', we would need to check records to confirm which payees and invoices meet this definition and can thereby be treated as in scope of your request. Some payees on our system would not be in scope, as they relate to MPI staffing or reimbursements for board members. The task of checking these records can only be undertaken manually and would

need to be completed by our Finance team as this task requires specific professional knowledge and expertise.

On the assumption each supplier record takes five minutes to check, this manual check would still take a single staff member dedicated to only this task just over nine weeks to complete. All suppliers need to be verified. Some will be relatively easy to verify, while others will take much longer, as it can be difficult to source the information required to verify.

Based on an estimated five minutes to check each supplier or 12 suppliers per hour = 378 hours; 378 hours/40 hours per week = 9.5 weeks. This figure does not account for personal leave or statutory holidays.

On top of this figure, we would need to corroborate information with the MPI Business Units which undertook the original purchases, to confirm specific details in the source records in our finance system.

The effort to review thousands of individual payments and consult with each vendor and payee, would have an unreasonable impact on the day-to-day operations of MPI.

Separate from the considerations of the use of s18(f) of the OIA we would need to undertake a number of consultations to ensure the correct application of the grounds in sections 6 and 9(2) of the OIA, to ensure that the release of this information does not prejudice:

- the commercial interests of certain suppliers, where the release of their name and a total spend is specific enough to prejudice their commercial interests;
- MPI's ability to carry out market tenders for some products and services, where the release of spending figures would thwart our ability to achieve the best market price; and
- MPI's ability to carry out any of its regulatory or enforcement functions.

For these reasons, I do not believe that the remedies in section 18A of the OIA, namely charging for this information, or extending the time frame for a response would allow your response to be granted, due to the overall size of the data set and the time it would take to process it for release.

I encourage you to review the financial information that MPI provides as part of our Annual Review. You are welcome to make a more specific request for information at any time, and we will endeavour to provide you with such information.

Should you have any concerns with this response, I would encourage you to raise these with the Ministry for Primary Industries at [Official.InformationAct@mpi.govt.nz](mailto:Official.InformationAct@mpi.govt.nz). Alternatively, you are advised of your right to also raise any concerns with the Office of the Ombudsman. Contact details are: Office of the Ombudsman, PO Box 10152, Wellington 6143 or at [info@ombudsman.parliament.nz](mailto:info@ombudsman.parliament.nz).

Yours sincerely



Tina Cornelius  
**Chief Financial Officer**