

<b>Reference</b>	FOI-2709241, FOI-2709242
<b>Received date</b>	27/09/2024
<b>Response date</b>	24/01/2025
<b>Subject</b>	Climate finance
<b>Status</b>	Withheld, S27, S36

### **Request summary**

#### **FOI-2709241**

In "[Rapid review: UK aid's international climate finance commitments](#)", ICAI refers to an "internal planning document" stating that "between 89% – 92% of the £11.6 billion is already planned (although the proportion that is approved is lower at 68%)".

It also refers to "other internal documentation" that refers to the unlikelihood of being able to stand up enough new programming in the remaining timeline.

Under the Freedom of Information Act 2000 and/or Environmental Information Regulations 2004, please could you provide me with all the internal documents mentioned above.

#### **FOI-2709242**

##### **Original request received 27/09/2024:**

In "[Rapid review: UK aid's international climate finance commitments](#)", ICAI refers to the tripling of UK adaptation finance from £500m in 2019 to £1.5bn in 2025.

The report also states that "in recent years the UK has not sustained the balance between mitigation and adaptation. The proportion of adaptation financing decreased from the 47% reported between 2016 and 2020, to below 40% in 2023".

Under the Freedom of Information Act 2000 and/or Environmental Information Regulations 2004, please provide me with the following:

- The annual £ value of UK climate finance dedicated to adaptation and the £ value of UK climate finance dedicated to mitigation in the years 2016 through to 2023. These should be the figures provided to ICAI by the government, which were used to calculate the % figures quoted above.
- If there are other types of climate finance that make up the total figures for each year besides adaptation and mitigation, please include the £ values for them over this period as well. In total, all the figures provided should add up to the total international climate finance (ICF) provided by the UK government annually between 2016-2023.

**Clarification received 22/10/2024:**

Would it be possible for ICAI to provide me with the percentages for each year over this time period, as provided for the climate finance review?

**Response**

Thank you for your Freedom of Information Requests of 27 September and 22 October 2024 relating to ICAI's climate finance review. I apologise for the length of time it has taken to respond definitively.

I can confirm that ICAI does hold information in scope of your requests. However, we are withholding this information under Sections 27 and 36 of the Freedom of Information Act (FOIA).

In accordance with the Information Commissioner's Office's guidance on consultation with third parties, ICAI has consulted FCDO, where the information originated, in order to help consider whether the information is suitable for disclosure. Our response reflects this consultation.

ICAI considers that the information is caught by s27(1), as disclosure of it would harm UK interests which are set out in the exemption. Climate and Nature finance negotiations remain live policy issues and releasing the information would prejudice ongoing international climate negotiations and would be detrimental to the UK's foreign policy objectives. The publication of internal government discussions on the ICF has the potential to undermine the UK's role within these negotiations, as well as undermine the trust and confidence other states and international organisations have in the UK.

Section 27 is a qualified exemption and is subject to a public interest test. Broadly, this means that the information should only be withheld under the exemption where the public interest in doing so outweighs that in favour of disclosure.

ICAI acknowledges that there are arguments in favour of disclosing the information, in that disclosure may further the understanding of and participation in current public debate issues around climate change and international climate finance. However, there is also a public interest in ensuring that the UK enjoys effective international relations with other states and organisations in order to further its foreign policy aims. We consider that the public interest in withholding the material concerned outweighs that in its disclosure.

ICAI considers that the information is caught by s36(c) (as disclosure of it would be likely to prejudice the effective conduct of public affairs). The s36 exemption requires a determination by a 'qualified person' that disclosure of the requested information would have one of the specified prejudicial effects.

The ICAI Commissioner, Liz Ditchburn, is the 'qualified person' for ICAI for the purposes of s36 of FOIA. She considers that the information you have requested is

caught by s36(c) and should also be withheld on that basis. In coming to this conclusion, she has been mindful of the fact that when FCDO has been asked for the same information previously it has withheld the information under s35 of FOIA (relating to the formulation and development of government policy) and applied its own public interest test before coming to that conclusion.

Section 36 is also qualified exemption and is subject to a public interest test. In favour of disclosure is the public interest in increased transparency regarding government's activities on meeting climate finance commitments which can build public trust and aligns with ICAI's mandate to hold the government accountable. Disclosure might also contribute to debate on how the UK is addressing its ICF commitment, which is an area of clear public interest.

However, there is also a public interest in preserving a safe space for officials and Ministers to discuss and debate live policy issues, and exchange views on available options freely and frankly, away from external interference and distraction. Another argument in favour of non-disclosure is the need for ICAI to maintain the effectiveness of its role in scrutinising government.

To discharge this role ICAI must have access to government information and relies on the cooperation of government departments to share information. If ICAI were to disclose information that originated in FCDO in contravention of that department's considered views as to why that information should rightly be withheld under FOIA, FCDO would likely be less willing to share information with ICAI in future. Therefore, on balance, Ms Ditchburn has concluded that the public interest favours the maintenance of the exemption under s36 and the information should be withheld.

If you would like us to carry out an internal review of this decision, please contact us at: [icai-enquiries@icai.independent.gov.uk](mailto:icai-enquiries@icai.independent.gov.uk).

If, after any internal review, you are still not satisfied with our response, you can complain or appeal to the Information Commissioner's Office.