



Australian
National
University

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Tom Orsag

Via Email: foi+request-10873-55b26ce9@righttoknow.org.au

Freedom of Information Request 202300115
Notification of Practical Refusal- Request Consultation Process

Dear Mr Orsag,

On 16 November 2023, the Australian National University received your request seeking access to documents under the *Freedom of Information Act 1982* (the Act).

I, Kathryn Dan, am an officer authorised under section 23(1) of the Act to make decisions in relation to FOI requests.

I am writing to inform you that I believe that the work involved in processing your request in its current form would substantially and unreasonably divert the resources of this agency from its other operations, and on that basis, I intend to refuse your request under s24AA of the FOI Act.

This refusal is due to the combination of the size and broad scope of your request.

Before I make a final decision to do this, you have an opportunity to revise your request. This is called a 'request consultation process' as set out under section 24AB of the FOI Act. You have 14 days to respond to this notice in one of the ways set out below.

Why I intend to refuse your request

In your request you sought the following:

The Australian National University
Canberra 2600, ACT Australia

'I request access to financial reports or any other reports that contain numerical data for the period 1 January 2013 – 1 November 2023 that record the University's purchase, sale or ownership of shares or funds (domestic or international) in the following companies:

- 1. Aecom**
- 2. Aerojet Rocketdyne**
- 3. Airbus Group**
- 4. Babcock International**
- 5. BAE Systems**
- 6. Bechtel**
- 7. Boeing**
- 8. BWX Technologies**
- 9. CH2M Hill**
- 10. Charles Stark Draper Laboratory**
- 11. Engility Holdings**
- 12. European Aeronautic Defence & Space**
- 13. General Dynamics**
- 14. Goodrich Corporation**
- 15. Fluor Corporation**
- 16. Honeywell International**
- 17. Huntington Ingalls Industries**
- 18. ITT Corporation**
- 19. Jacobs Engineering**
- 20. Larsen & Toubro**
- 21. Leonardo-Finmeccanica**
- 22. Lockheed Martin**

- 23. Moog Inc.**
- 24. Northrop Grumman**
- 25. Orbital ATK**
- 26. Raytheon [now RTX]**
- 27. Redhall Group**
- 28. Rockwell Collins Inc**
- 29. Rolls Royce Holdings**
- 30. Safran**
- 31. SAIC Inc**
- 32. Serco Group**
- 33. Textron**
- 34. Thales**
- 35. Thyssenkrupp**
- 36. Walchandnagar Industries'**

After considering the scope of your request in its entirety and undertaking initial search and retrieval processes, the initial documents that have been provided to the FOI function (71 in total, with an average page count of 8) will require extensive third party consultation with a range of entities. As such, your request as it currently stands amounts to an unreasonable diversion of the University's resources under FOI legislation.

My assessment of the time and resources it would take to process your request appropriately includes, but is not limited to, the following elements:

- Search and retrieval processes
- Initial review/discussion of documents to assess their relevance to scope
- Internal and external consultations regarding the content of documents

- Processing documents (formatting and converting from different file types to PDF)
- Validating and discussing exemptions
- Applying redactions
- Developing decision letter and other correspondence associated with your request
- QA Review of all documentation
- Finalisation of documentation for circulation.

You may consider revising your request by reducing the scope to something that is less resource intensive to process. For example, by providing more specific information about exactly what documents/issues/information you are interested in, the University will be able to pinpoint the relevant documents more quickly and avoid using excessive resources to process any documents that you may not be interested in.

Before the end of the consultation period, you must do one of the following things, in writing:

- Revise your request to remove the practical refusal reason;
- Tell us that you do not wish to revise the request; or
- Withdraw the request.

The consultation period runs for 14 days and starts on the day after you receive this notice.

If you revise your request in a way that adequately addresses the practical refusal grounds outlined above, we will recommence processing it. (Please note that the time taken to consult you regarding the scope of your request is not taken into account for the purposes of the 30-day time limit for processing your request.)

If you do not do one of the three things listed above during the consultation period, your request will be taken to have been withdrawn and you will be advised as such in writing.

Contact officer

If you would like to revise your request or have any questions regarding any of the above, please contact me via foi@anu.edu.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Dan', written over a light grey rectangular background.

Kathryn Dan
Associate Director
Records and Archives