HEAD OFFICE
1 Swift Square,
Northwood, Santry,
Dublin 9, Ireland
T + 353 1 807 3800
F + 353 1 807 3838
E info@nsai.ie
NSAI.ie

Our Reference: AIE/02-20
Your Reference: FPL/642/02744

By email only

Mr FP Logue
fred.logue@fplogue.com

19th January 2023

REGIONAL CENTRE
Limerick
Plassey Park Road,
Castletroy, Limerick
T + 353 61 330 708
F + 353 61 330 698

INTERNATIONAL OFFICE
NSAI Inc.
20 Trafalgar Square
Suite 603
Nashua, NH 03063
T +1 603 882 4412
F +1 603 882 1985
E info@nsaiinc.com

NSAIinc.com

Re: Internal Review AIE request 02-20

Dear Mr Logue

I refer to your request dated 22 December 2022 ("**the review request**") on behalf of Public.Resource.Org Inc and Right to Know CLG ("**the Requesters**") made under the European Communities (Access to Information on the Environment) Regulations 2007 to 2018 (S.I. No. 133 of 2007, S.I. No. 662 of 2011, S.I. 615 of 2014 and S.I. No. 309 of 2018) ("**the AIE Regulations**"), requesting an internal review of the decision made by NSAI on 13 December 2022 refusing to grant access to the following standards ("**the Records**") under the AIE Regulations ("**the Decision**"):

I.S. EN ISO 14001:2004	Environmental management systems - Requirements with guidance for use (ISO 14001:2004)
I.S. EN ISO 14001:2015	Environmental management systems - Requirements with guidance for use (ISO 14001:2015)
I.S. EN ISO 14004:2010	Environmental management systems - General guidelines on principles, systems and support techniques (ISO 14004:2004)

I.S. EN ISO 14004:2016	Environmental management systems - General guidelines on implementation (ISO 14004:2016)
I.S. EN ISO 14015:2010	Environmental management - Environmental assessment of sites and organizations (EASO) (ISO 14015:2001)
I.S. EN ISO 14064-1:2012	Greenhouse gases - Part 1: Specification with guidance at the organization level for quantification and reporting of greenhouse gas emissions and removals (ISO 14064-1:2006)
I.S. EN ISO 14064-2:2012	Greenhouse gases - Part 2: Specification with guidance at the project level for quantification, monitoring and reporting of greenhouse gas emission reductions or removal enhancements (ISO 14064-2:2006)
I.S. EN ISO 14064-3:2012	Greenhouse gases - Part 3: Specification with guidance for the validation and verification of greenhouse gas assertions (ISO 14064-3:2006)
I.S. EN ISO 14065:2012	Greenhouse gases - Requirements for greenhouse gas validation and verification bodies for use in accreditation or other forms of recognition
I.S. EN ISO 14065:2013	Greenhouse gases - Requirements for greenhouse gas validation and verification bodies for use in accreditation or other forms of recognition (ISO 14065:2013)

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F + 353 61 330 698

INTERNATIONAL OFFICE
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Nashua, NH 03063
T +1 603 882 4412
F +1 603 882 1985
E info@nsaiinc.com

NSAIinc.com

1. Summary of internal review outcome

1.1 I was assigned to review your request and confirm I am unconnected with the Decision. I am of a higher rank than the officer who made the Decision.

1.2 For convenience, where I have used capitalised terms below these are intended to convey the same meaning as indicated in the Decision, unless otherwise stated.

1.3 I have examined all information relevant to your review request and have considered matters afresh. This comprises all of the information referred to and considered in the Decision, including:

(a) the content of the Records themselves;

(b) the terms of the Request and submissions made on behalf of the Requesters in support of access to the Records;

(c) the AIE Regulations;

(d) the Guidelines;

(e) the AIE Directive;

(f) the Aarhus Convention;

(g) the documents appended to the Decision (in the Annexes thereto);

(h) the submissions contained in your review request dated 22 December 2022.

1.4 For the avoidance of doubt, insofar as your letter dated 22 December 2022 is described by you as providing "*[a]n outline of our clients' comments on the refusal decision*", I have confirmed that NSAI has received no other comments or submissions on behalf of your clients. As such, the "*outline … comments*" provided in your letter dated 22 December 2022 are assessed by NSAI as representing the totality of the Requesters' submissions on this review.

1.5 I have decided to **affirm** the Decision, for the reasons set out in more detail below.

HEAD OFFICE
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F +1 603 882 1985
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2. Findings of Internal Review

2.1 Issue: whether Records within scope of AIE Regulations

2.1.1 I am satisfied that the that the Records:

(a) constitute information on the environment; and

(b) constitute information held by a public authority

for the reasons set out at § 2.1 of the Decision, and I adopt those reasons. I note from § 1 of the review request that no issue is taken by the Requesters with this aspect of the Decision.

2.2 Issue: general obligation to make Records available, subject to statute and the AIE Regulations

2.2.1 I consider there is a general obligation under Article 7(1) AIE Regulations on any "*public authority … notwithstanding any other statutory provision and subject only to these Regulations [to] make available to [an] applicant any environmental information, the subject of [a] request, held by, or for, the public authority*".

2.2.2 Therefore, as a starting point for this internal review, it should be borne in mind that there is a general obligation on NSAI under the AIE Regulations to make available environmental information held by it, subject only to the AIE Regulations and any grounds arising therein which would justify a refusal of the Request.

2.3 Issue: whether mandatory grounds for refusal of the Request arise in this case

2.3.1 I have considered Article 8 AIE Regulations and I am satisfied that no grounds exist which (subject to Article 10 AIE Regulations) would *mandate* a refusal of the

Request. I note no contention to the contrary is made in the submissions of the Requesters requesting a review of the Decision.

2.4 Issues: whether discretionary grounds for refusal of the Request arise in this case and whether intellectual property rights would be adversely affected by disclosure

2.4.1 I have considered Article 9 AIE Regulations which sets out certain discretionary grounds for refusal of access to environmental information. Article 9 states:

"*A public authority may refuse to make available environmental information where disclosure of the information requested would adversely affect –*

… (d) intellectual property rights."

2.4.2 Pursuant to Article 10(4) AIE Regulations, grounds for refusal of requests for environmental information must be interpreted restrictively:

"*The grounds for refusal of a request for environmental information shall be interpreted on a restrictive basis having regard to the public interest served by disclosure.*"

2.4.3 I am satisfied that the definition of "*intellectual property rights*", interpreted according to its ordinary meaning, encompasses copyrighted material. This is reinforced by the Guidelines, which confirm that the reference to "*intellectual property rights*" in Article 9(1)(d) AIE Regulations "*would be likely to include copyright protected material*".[1]

Issue: whether copyright exists in the Records

[1] Guidelines, § 12.5

HEAD OFFICE
1 Swift Square.
Northwood, Santry,
Dublin 9, Ireland
T + 353 1 807 3800
F + 353 1 807 3838
E info@nsai.ie

NSAI.ie

REGIONAL CENTRE
Limerick
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Castletroy, Limerick
T + 353 61 330 708
F + 353 61 330 698

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T +1 603 882 4412
F +1 603 882 1985
E info@nsaiinc.com

NSAIinc.com

2.4.4 I am satisfied that the Records should properly be considered copyrighted material, for the reasons set out at §§ 2.4.5 to 2.4.19 of the Decision, which I adopt.

2.4.5 In reaching this conclusion, I have considered the Requesters' submissions at **§ 2** of the review request, to the effect that the Records should not be considered protected by copyright.

2.4.6 At **§ 2a** of the review request, the Requesters submit that it is wrong to place reliance on the decision of the General Court in *Right to Know* because it is "*under appeal*" to the CJEU and because it concerns "*a different set of records requested under different legislation*".

2.4.7 First, I believe the Requesters are mistaken to suggest that reliance should not be placed on *Right to Know* simply because the judgment is under appeal. Unless and until such time as the CJEU reverses the judgment of the General Court in *Right to Know*, that judgment remains good law. At the time of reviewing the Decision, the CJEU has not delivered judgment on the appeal and the judgment General Court in *Right to Know* remains good law and should be relied upon by NSAI.

2.4.8 Secondly, while the Requesters are correct that *Right to Know* concerns "*a different set of records requested under different legislation*", I do not believe this to be germane to the issues under consideration. The judgment of the General Court *Right to Know* as regards the capacity of harmonised standards to enjoy copyright protection was expressed in general terms, and did not depend on the specific content of the records at issue in that case. The Requesters do not point to any specific difference between the Records and the records in *Right to Know* which should mean that the Records should be treated differently as regards their capacity to enjoy copyright protection.

HEAD OFFICE
1 Swift Square,
Northwood, Santry,
Dublin 9, Ireland
T + 353 1 807 3800
F + 353 1 807 3838
E info@nsai.ie

NSAI.ie

REGIONAL CENTRE
Limerick
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F + 353 61 330 698

INTERNATIONAL OFFICE
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F + 353 1 807 3838
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E info@nsaiinc.com

NSAIinc.com

2.4.9 Equally, the fact that the records requested in *Right to Know* were "*requested under different legislation*" is not germane to the issues under consideration. The findings of the General Court in *Right to Know* regarding the capacity of harmonised standards to enjoy copyright protection did not depend on the legislation under which access was requested. The Requesters do not explain in their submissions why the distinction in the legislation under which access was sought should mean that harmonised standards, although copyrighted in *Right to Know* according to the General Court, should not also be copyrights when requested under the AIE Regulations. A work is either sufficiently original to merit copyright protection, or it is not. The copyrightability or otherwise of a work is not affected by the legislation under which access to it might subsequently be requested, and the Requesters do not explain why it should be.

2.4.10 At **§ 2b** of the review request, the Requesters submit that the "*bald assertions*" of ISO and CEN to the effect that the Records are copyrighted are "*irrelevant since copyright is a legal concept and exists only to protect works which are original … and the classification is reserved only to the elements of a work which that* [sic] *are the expression of such creation.*"

2.4.11 I do not disagree with the Requesters either that copyright is a legal concept, or that the assertion of copyright by an author is not itself dispositive of the question whether that author's work is sufficiently original to merit copyright protection as a matter of law.

2.4.12 For the avoidance of any doubt, however, that is not what the Decision found. The Decision did not rely on assertions by ISO and CEN for the purpose of arriving at a conclusion as to the copyrighted nature of the Records. Indeed, at §§ 2.4.5 – 2.4.7 the Decision noted that the Records are subject to copyright claims by ISO and CEN but expressly stated at § 2.4.9 that "*the views of any party claiming copyright in specific material are not themselves dispositive of the merits of such a claim.*"

HEAD OFFICE
1 Swift Square.
Northwood, Santry,
Dublin 9, Ireland
T + 353 1 807 3800
F + 353 1 807 3838
E info@nsai.ie

NSAI.ie

REGIONAL CENTRE
Limerick
Plassey Park Road,
Castletroy, Limerick
T + 353 61 330 708
F + 353 61 330 698

INTERNATIONAL OFFICE
NSAI Inc.
20 Trafalgar Square
Suite 603
Nashua, NH 03063
T +1 603 882 4412
F +1 603 882 1985
E info@nsaiinc.com

NSAIinc.com

2.4.13 It was necessary to consider the copyright claims of ISO and CEN. A work might be in principle copyrightable but, where its author elects not to assert copyright over the work for whatever reason, this could be relevant to subsequent considerations such as whether intellectual property rights would be "*adversely affected*" by disclosure (Article 9(1)(d) AIE Regulations) and / or the balancing of the public interest against the interest served by refusal (Article 10(3) AIE Regulations).

2.4.14 The Requesters submit that the Records "*merely lists of technical procedures, thresholds, methodologies, templates etc which by their very nature are not original*" and there is no room for "*any form of free and creative choice since they are governed by their own standards….*"

2.4.15 I reject this submission, having considered the nature and content of the Records and for the reasons set out at § 2.4.10 onwards of the Decision, which I adopt. I am satisfied that, while the Records take into account the specific requirements provided for in the legislation which they support, the Records were nonetheless drafted by their authors in a manner sufficiently creative as to justify a conclusion that the Records reflect the personality of their authors as an expression of their free and creative choices. It is apparent from the length of the texts that several choices were made by the authors of the Records, including in relation to the structuring of the Records and the manner in which the information contained therein is presented, which renders the Records an original work of authorship. As already stated, is supported by the judgment of the General Court in *Right to Know*.

2.4.16 At **§ 2c** of the review request, the Requesters submit that the judgment in *James Elliott Construction* "*speaks for itself*" and "*couldn't be clearer*" in support of the argument that the Records are not protected by copyright.

HEAD OFFICE
1 Swift Square,
Northwood, Santry,
Dublin 9, Ireland
T + 353 1 807 3800
F + 353 1 807 3838
E info@nsai.ie

NSAI.ie

REGIONAL CENTRE
Limerick
Plassey Park Road,
Castletroy, Limerick
T + 353 61 330 708
F + 353 61 330 698

INTERNATIONAL OFFICE
NSAI Inc.
20 Trafalgar Square
Suite 603
Nashua, NH 03063
T +1 603 882 4412
F +1 603 882 1985
E info@nsaiinc.com

NSAIinc.com

2.4.17 However, the judgment in *James Elliott Construction* does not address the question whether harmonised standards can be properly considered copyrighted material. The judgment of the General Court in *Right to Know* held (at §§51-54) that "*it is in no way apparent from the judgment of 27 October 2016, James Elliott Construction … that the Court of Justice declared invalid the system of publication of harmonised standards laid down in Article 10(6) of Regulation No 1025/2012, by which only the references of those standards are to be published*", and concluded that the applicants in *Right to Know* were:

"*wrong to claim that, since the Court of Justice held in the judgment of 27 October 2016, James Elliott Construction (C-613/14, EU:C:2016:821) that the requested harmonised standards formed part of 'EU law', those harmonised standards should be freely accessible without charge with the result that no exception to the right of access can be applied to them.*"

2.4.18 In this regard I agree with the reasons provided in the Decision at §§ 2.4.13 – 2.4.19 and adopt same.

2.4.19 At **§ 2d** of the review request, the Requesters submit that the Decision "*has not dealt with the fact that the NSAI is required to actively disseminate the Records under Article 7(2)(a) of the AIE Directive since this provision includes EU and Irish law which the Court of Justice has already found to include the Records.*"

2.4.20 I reject this submission. Article 7(2)(a) Directive provides:

1. Member States shall take the necessary measures to ensure that public authorities organise the environmental information which is relevant to their functions and which is held by or for them, with a view to its active and systematic dissemination to the public, in particular by means of computer telecommunication and/or electronic technology, where available….

HEAD OFFICE
1 Swift Square,
Northwood, Santry,
Dublin 9, Ireland
T + 353 1 807 3800
F + 353 1 807 3838
E info@nsai.ie

NSAI.ie

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Limerick
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Castletroy, Limerick
T + 353 61 330 708
F + 353 61 330 698

INTERNATIONAL OFFICE
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T +1 603 882 4412
F +1 603 882 1985
E info@nsaiinc.com

NSAIinc.com

2. The information to be made available and disseminated shall be updated as appropriate and shall include at least:

(a) texts of international treaties, conventions or agreements, and of Community, national, regional or local legislation, on the environment or relating to it; …

2.4.21 I understand the Requesters' submission in this context to be that the Records are or amount to "*legislation … on the environment or relating to it….*" The Records were not composed or created by any legislative body and are not "*texts of … legislation, on the environment or relating to it….*" I reject this argument for the reasons set out at §§ 2.4.13 – 2.4.19 of the Decision, which I adopt.

Issue: whether intellectual property rights would be adversely affected by disclosure of the Records

2.4.22 I am satisfied that intellectual property rights would be adversely affected by disclosure of the Records, for the reasons set out at §§ 2.4.20 – 2.4.22 of the Decision, which I adopt.

2.4.23 In reaching this conclusion, I have considered the Requesters' submissions at **§3** of the review request to the effect that, even if the Records *are* protected by copyright, the "*exception in Regulation 9(1)(d) is not engaged.*"

2.4.24 At **§3a** of the review request, the Requesters submit that it is not a breach of copyright to grant access to the Records by virtue of s.76 Copyright and Related Rights Act 2000 ("**CRRA 2000**") which provides that it is "*not an infringement of copyright to undertake an act under statutory authority as is the case here.*"

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2.4.25 However, the issue to be considered herein is not simply whether granting disclosure of the Records would amount to an infringement of the copyright in the Records, which is the issue addressed by s.76 CRRA 2000. The issue under Article 9(1)(d) AIE Regulations is whether disclosure of the information "*would adversely affect … intellectual property rights*". The fact that NSAI might have a statutory defence under s.76 CRRA 2000 to any action for breach of copyright by ISO or CEN does not logically entail the proposition that NSAI cannot take the view that disclosure of the Records under the AIE Regulations would adversely affect the copyright contained therein. The Requesters' submission does not logically flow from the premise.

2.4.26 At **§ 3b** of the review request, the Requesters submit that there is "*no suggestion that the requestors' use of the Records, once released, would infringe any alleged copyright*", and they confirm any use of the Records will be confined to lawful acts.

2.4.27 I reject the argument that any undertaking or commitment not to breach copyright by the recipient of records released under the AIE Regulations must mean the grounds for refusal under Article 9(1)(d) AIE Regulations are "*not engaged.*" There can be no advance binding commitment on such a recipient, and NSAI is not confined to assessing the effect on intellectual property rights by reference to what the Requesters say will occur. For the avoidance of any doubt, this does not involve NSAI in any assumption that the Requesters would necessarily breach copyright. The relevant assessment must be made having regard to the fact that, in the event Article 9(1)(d) AIE Regulations were considered "*not engaged*", and the Request thus acceded to, the Records would in principle become available to the world at large, and the protection of intellectual property rights could not be relied upon as against any requesting party.

HEAD OFFICE
1 Swift Square,
Northwood, Santry,
Dublin 9, Ireland
T + 353 1 807 3800
F + 353 1 807 3838
E info@nsai.ie

NSAI.ie

REGIONAL CENTRE
Limerick
Plassey Park Road,
Castletroy, Limerick
T + 353 61 330 708
F + 353 61 330 698

INTERNATIONAL OFFICE
NSAI Inc.
20 Trafalgar Square
Suite 603
Nashua, NH 03063
T +1 603 882 4412
F +1 603 882 1985
E info@nsaiinc.com

NSAIinc.com

HEAD OFFICE
1 Swift Square.
Northwood, Santry,
Dublin 9, Ireland
T + 353 1 807 3800
F + 353 1 807 3838
E info@nsai.ie

NSAI.ie

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Limerick
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Castletroy, Limerick
T + 353 61 330 708
F + 353 61 330 698

INTERNATIONAL OFFICE
NSAI Inc.
20 Trafalgar Square
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T +1 603 882 4412
F +1 603 882 1985
E info@nsaiinc.com

NSAIinc.com

2.4.28 At **§ 3c** of the review request, the Requesters submit that NSAI or a copyright-holder could "*apply to the District, Circuit or High Court*" and "*litigat[e their] copyright claims*" as necessary.

2.4.29 I reject this submission. The fact that judicial remedies are in principle available for breach of copyright does not mean there would not be an adverse effect on intellectual property rights through disclosure. Such judicial redress has always been available for breach of copyright, and so it cannot have been the intention of the legislature that the existence of such redress means Article 9(1)(d) AIE Regulations is necessarily "*not engaged*" as a matter of principle, as the Requesters submit. Otherwise an adverse effect on intellectual property rights would never be capable of justifying discretionary refusal of access to environmental information, because it would always be open to the copyright-holder to sue to defend their interests.

2.4.30 On the contrary, the Guidelines specifically state that the reference to "*intellectual property rights*" in Article 9(1)(d) of the AIE Regulations "*would be likely to include copyright protected material*".[2]

2.4.31 At **§3d** of the review request, the Requesters submit that the "*income that would be allegedly lost has not been quantified or put in the context of the overall streams of the holders of the alleged* copyrights", but it is "*obvious*" the "*loss of revenue would be negligible.*"

2.4.32 I reject this submission. First, the Requesters have provided no evidence to support the contention that it is "*obvious*" that the "*loss of revenue would be negligible*". Furthermore, there is nothing in either Article 9(1)(d) AIE Regulations or elsewhere that establishes a specific minimum threshold of economic loss – whether in the context of the income stream of a copyright-holder or otherwise – which must be exceeded before Article 9(1)(d) AIE Regulations would be considered to be "*engaged*" (although it is accepted that

[2] Guidelines, § 12.5

any adverse effect on intellectual property rights requires to be weighed against the public interest in release of the Records (addressed below)).

2.4.33 Without prejudice to the above, the Requesters appear to consider that the relevant assessment as to whether intellectual property rights would be adversely affected can only be made having regard to the impact on intellectual property rights which would arise if the Records (and only the Records) were released to the Requesters (and only the Requesters). I reject this contention. NSAI is entitled to have regard to the implications of a grant of access to the Records for copyright in harmonised standards (containing environmental information) generally. This would necessarily be one of the "*effects*" of such a grant of access.

2.4.34 If the Requesters' argument were to be followed through to its logical conclusion, all copyrighted standards would, in principle, become available to the world at large. The adverse effect on intellectual property rights of standardisation organisations such as ISO and CEN could never even be considered, because the loss of revenue in the case of each individual request would be too small to "*engage*" Article 9(1)(d) AIE Regulations.

2.4.35 There is nothing I can see, whether in the text of Article 9(1)(d) AIE Regulations or elsewhere, to support the contention that the implications of disclosure can only be considered in the context of the impact on the intellectual property rights *attaching to the specific documents requested*. Notably, Article 9(1)(d) AIE Regulations refers to "*intellectual property rights*", without further qualification. It is not limited to (for example) "*the intellectual property rights inhering in the documentation requested*". Given the broad definition legislated for in the AIE Regulations, NSAI is entitled to have regard to the broad impact on copyright attaching to harmonised standards (containing environmental information) which would be inevitably caused by disclosure of the Records, including that copyright in such standards generally could not be relied upon to refuse disclosure under the AIE Regulations.

HEAD OFFICE
1 Swift Square,
Northwood, Santry,
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T + 353 1 807 3800
F + 353 1 807 3838
E info@nsai.ie

NSAI.ie

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NSAIinc.com

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2.4.36 Furthermore, it is incorrect to suggest that the Decision did not have regard to the quantum of loss which would arise. The Decision referred to Commission Staff Working Paper, SEC (2011) 671 final of 1 June 2011 which estimated that the costs of creating standards within the European standardisation organisations were estimated at €3bn in 2009, 93-95% of which costs are borne by industry, predominantly through revenues from the sale or licensing of standards. Accordingly, the revenues generated through the sale and licensing of standards are extremely substantial.

2.4.37 At **§ 3e** of the review request, the Requesters submit that the Decision means that the standardisation system "*systematically takes precedence over the right of access*" to standards, as access must always be refused. I reject this submission. A request for access under the AIE Regulations to a harmonised standard would always, as in the present case, fall to be determined based upon a consideration of the nature and content of the records. The fact that many, most or even all harmonised standards might be sufficiently original works as to legitimately be copyrighted, thereby engaging Article 9(1)(d) AIE Regulations, does not mean that the right of access under the AIE Regulations has thereby been "*systematically*" displaced. There is no numerical limit provided for in the AIE Regulations, beyond which refusal of disclosure becomes "*systematic*" and therefore unlawful.

2.4.38 The Requesters have therefore misconstrued the Decision insofar as they contend that the Decision means harmonised standards *per se* constitute a "*category of information*" not subject to disclosure. To use the Requesters' language, the "*category of information*" which is capable of being refused is information whose disclosure may "*adversely affect … intellectual property rights*". Refusal of access to this "*category of information*" is expressly provided for in Article 9(1)(d) AIE Regulations, on discretionary grounds and subject to being weighed against the public interest in disclosure.

HEAD OFFICE
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F + 353 1 807 3838
E info@nsai.ie

NSAI.ie

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NSAI.ie

2.4.39 **§3f** of the review request does not set out a discrete ground of review not already addressed above.

2.5 Issue: weighing the public interest served by disclosure against the interest served by refusal

2.5.1 I am satisfied that the public interest served by refusal outweighs the public interest served by disclosure in this case, for the reasons set out at § 2.5 of the Decision, which I adopt.

2.5.2 In reaching this conclusion, I have considered the Requesters' submissions at **§ 4** of the review request, to the effect that the public interest favours release of the Records.

REGIONAL CENTRE
Limerick
Plassey Park Road,
Castletroy, Limerick
T + 353 61 330 708
F + 353 61 330 698

INTERNATIONAL OFFICE
NSAI Inc.
20 Trafalgar Square
Suite 603
Nashua, NH 03063
T +1 603 882 4412
F +1 603 882 1985
E info@nsaiinc.com

NSAIinc.com

2.5.3 At **§ 4a** of the review request, the Requesters submit that "*the alleged copyright will exist one way or the other*" and "*the point of copyright is to allow authors to make their works available*", therefore "*no impact on copyright*" arises from disclosure.

2.5.4 I reject this submission. The copyright-holders in this case do "*make their works available*": as explained at § 2.5.24 of the Decision, "*harmonised standards are generally available to be purchased through the NSAI webstore and copies are available to be viewed at NSAI Headquarters subject to terms and conditions which* inter alia *protect the copyright inhering in standards….*" The question under consideration is whether the Records should also be made available *separately*, under the AIE Regulations. In determining that question, it is clearly open to NSAI to consider the impact of disclosure on intellectual property rights. Making a work available through access via the AIE Regulations – rather than through purchase or *in situ* examination subject to copyright terms, thereby protecting and vindicating copyright – would have a serious adverse impact on copyright interests, contrary to the Requesters' submissions.

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2.5.5 At **§ 4b** of the review request, the Requesters submit that the public interest factors in favour of refusal "*must be made by reference to the content of the Records*" and "*a quantification of the degree and likelihood of the harm anticipated by release to the requestors of the Records and nothing else.*" The Requesters submit this harm would be "*negligible relative to the size of ISO and CEN and bearing in mind NSAI is state funded.*"

2.5.6 I reject this submission. The Requesters provide no authority for the proposition that, in weighing the public interest in disclosure against the interests favouring refusal, the only harm which can be considered by NSAI is that exclusively related to "*release … of the Records and nothing else*", to the exclusion of implications for intellectual property rights inhering in other similar standards and the standardisation system generally. As already set out above, Article 9(1)(d) AIE Regulations refers to "*intellectual property rights*" in the plural and in general terms, and is not confined solely to the intellectual property rights attaching to the individual Records.

2.5.7 At **§ 4c** of the review request, the Requesters submit that the Decision failed to take into account the fact that the Records concern environmental management and greenhouse gases and therefore is important "*in the context of combating climate change and halting biodiversity loss*".

2.5.8 This is incorrect. The Decision clearly set out the nature of the Records and the standards contained therein, which relate to such matters as *inter alia* environmental management and environmental management systems, quantification and reporting of greenhouse gas emissions and removals, reductions, removal enhancements, validation and verification of greenhouse gas assertions. The Decision acknowledged that the Records constituted measures directed towards the protection of elements of the environment. The Decision addressed (at § 2.5.6 onwards) the "*particular*" public interest in the disclosure of harmonised standards containing *any* environmental information, and noted that public access to such environmental information contributes to "*a better environment*".

HEAD OFFICE
1 Swift Square,
Northwood, Santry,
Dublin 9, Ireland
T + 353 1 807 3800
F + 353 1 807 3838
E info@nsai.ie

NSAI.ie

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Limerick
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F + 353 1 807 3838
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2.5.9 Beyond that, the Requesters' argument as to the importance of access to the Records "*in the context of combating climate change and halting biodiversity loss*" is pitched at a very general level, with no explanation or evidence regarding the exact importance of the Records in that context. Accordingly, it is not possible to respond to the Requesters' submissions in this respect in greater detail.

2.5.10 Insofar as the Requesters refer again at **§ 4c** of the review request to the argument that the Records are "*part of EU and Irish law*" and "de facto *mandatory*", the Decision expressly acknowledged the "*significant role*" played by harmonised standards "*in terms of ensuring compliance with EU legislation of processes, products and/or services placed on the European single market and are a fundamental feature of the so-called 'New Approach' (as revised under the 'New Legal Framework').*" I adopt the reasoning set out at §§ 2.5.7 – 2.5.9 of the Decision, which recognises the public interest arising here.

2.5.11 However, I am equally satisfied to adopt the reasoning set out at §§ 2.5.10 – 2.5.23 of the Decision weighs the serious and significant public interests which would be served by refusing access to the Records and concludes that, on balance, those interests outweigh the public interests which would be served by disclosure of the Records.

2.5.12 **§ 4d** of the review request does not set out a discrete ground of review not already addressed above.

2.6 Issue: *in situ* examination

2.6.1 At **§ 5a** of the review request, the Requesters note that "*the internal review* [sic] *has not dealt with in-situ consultation of the Records and we would ask that this be considered in the internal review decision*" as it would "*facilitate a more focussed submission on why electronic copies should be provided and therefore this is an additional public interest factor specifically in relation to the form and manner of access.*"

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2.6.2 As stated in the Commissioner's Decision dated 21 October 2022 (ref. OCE-100065-V5F5W9) at § 23: "*it is only when it has been determined that information should properly be released that article 7(3) of the AIE Regulations can be engaged*". The Requesters' submissions in this regard relate to the form and manner of access to the Records under Article 7(3), not the question of access itself. As access to the Records is being refused pursuant to this review of the Decision, the question of the form and/or manner of access to the Records – including *in situ* examination – does not arise for consideration in the circumstances.

2.7 Result

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2.7.1 On review of the Decision, I adopt the findings and reasons in the Decision in their entirety. I reject the submissions made on the review request, for the reasons already stated above.

2.7.2 Pursuant to Article 11(2)(a) AIE Regulations, therefore, I **affirm** the Decision.

3. Right of Appeal

3.1 In accordance with Article 12(3) AIE Regulations you may appeal this decision to the Commissioner for Environmental Information. If you wish to appeal, you must do so within one month of receipt of this notification, to:

The Office of the Commissioner for Environmental Information,
6 Earlsfort Terrace, Dublin 2, D02 W773.
Phone: +353-1-639 5689
Email: info@ocei.ie

3.2 It is also possible to appeal online, see the website of the Commissioner for further details https://www.ocei.ie/.

3.3 The fee for such an appeal is €50 or €15 if you are the holder of a medical card or the dependent of the holder of a medical card.

4. Contact details

Please contact me at +353 1 807 3800 or **enda.mcdonnell@nsai.ie** if I can assist you in any matter relating to your request.

Yours sincerely,

Enda McDonnell

Enda McDonnell

Director of Standards & Metrology

HEAD OFFICE
1 Swift Square.
Northwood, Santry,
Dublin 9, Ireland
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F + 353 1 807 3838
E info@nsai.ie

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