

Notice of Decision and Reasons for Decision

Applicant: 'EP7'
Agency: Department of Transport
Decision date: 22 June 2022
Exemptions considered: Sections 28(1)(b) 28(1)(c), 28(1)(d), 30(1)
Citation: 'EP7' and Department of Transport (Freedom of Information) [2022] VICmr170 (22 June 2022)

FREEDOM OF INFORMATION – internal working documents – Cabinet documents – Independent Broad-based Anti-corruption Commission (IBAC) investigation – V/Line Corporation – terms of reference

All references to legislation in this document are to the *Freedom of Information Act 1982* (Vic) (**FOI Act**) unless otherwise stated.

Notice of Decision

I have conducted a review under section 49F of the Agency's decision to refuse access to documents requested by the Applicant under the FOI Act.

My decision on the Applicant's request differs from the Agency's decision.

I am not satisfied the documents subject to review are exempt from release under sections 28(1)(b), 28(1)(c), 28(1)(d) and 30(1).

As I am satisfied it is practicable to provide the Applicant with an edited copy of the documents with irrelevant information deleted in accordance with section 25, access to documents is granted in part.

The Schedule of Documents in **Annexure 1** sets out my decision in relation to each document.

My reasons for decision follow.

Joanne Kummrow
Public Access Deputy Commissioner
22 June 2022

Reasons for Decision

Background to review

1. The Applicant made a request to the Agency seeking access to the following documents:

Documents detailing the steps taken by the Department of Transport and its agencies in response to the IBAC Lansdowne Inquiry and Report.
2. The Agency identified two documents falling within the terms of the Applicant's request and granted access to one document in part and refused access to one document in full under sections 28(1)(c), 28(1)(d), 30(1) and 33(1).
3. The Agency's decision letter sets out the reasons for its decision.
4. In summary, the Applicant's request relates to an investigation conducted by the Independent Broad-based Anti-corruption Commission (IBAC), identified as 'Operation Lansdowne', which held public examinations in mid-2017 into allegations of serious corruption at the V/Line Corporation (V/Line).

Review application

5. The Applicant sought review by the Information Commissioner under section 49A(1) of the Agency's decision to refuse access.
6. During the review, the Applicant indicated they do not seek access to personal affairs information in the requested documents. Accordingly, this information is irrelevant information for the purposes of section 25, which is discussed below.
7. The Agency was asked to provide submissions in support of its decision to refuse access to documents under section 28(1)(c) and 28(1)(d). I am satisfied the Agency has been afforded with a reasonable opportunity to provide those submissions.
8. I have examined a copy of the documents subject to review.
9. The Applicant and the Agency were invited to make a written submission under section 49H(2) in relation to the review.
10. I have considered all communications and submissions received from the parties.
11. In undertaking my review, I have had regard to the object of the FOI Act, which is to create a general right of access to information in the possession of the Government or other public bodies, limited only by exceptions and exemptions necessary to protect essential public interests, privacy and business affairs.
12. I note Parliament's intention the FOI Act must be interpreted so as to further the object of the Act and any discretions conferred by the Act must be exercised, as far as possible, so as to facilitate and promote the disclosure of information in a timely manner and at the lowest reasonable cost.
13. In conducting a review under section 49F, section 49P requires that I make a new or 'fresh decision'. Therefore, my review does not involve determining whether the Agency's decision is correct, but rather requires my fresh decision to be the 'correct or preferable decision'.¹ This involves ensuring my decision is correctly made under the FOI Act and any other applicable law in force at the time of my decision.

¹ *Drake v Minister for Immigration and Ethnic Affairs* (1979) 24 ALR 577 at 591.

Review of exemptions

Section 30(1) – Internal working documents

14. Section 30(1) has three requirements:

- (a) the document must disclose matter in the nature of opinion, advice or recommendation prepared by an officer or Minister, or consultation or deliberation that has taken place between officers, Ministers or an officer and a Minister;
- (a) such matter must be made in the course of, or for the purpose of, the deliberative processes involved in the functions of an agency or Minister or of the government; and
- (b) disclosure of the matter would be contrary to the public interest.

15. The exemption does not apply to purely factual material in a document.²

Do the documents disclose matter in the nature of opinion, advice or recommendation prepared by an officer or Minister, or consultation or deliberation that has taken place between officers, Ministers or an officer and a Minister?

16. It is not necessary for a document to be in the nature of opinion, advice or recommendation. Rather, it is enough that release of the document would disclose matter of that nature.³

17. The following information does not constitute matter in the nature of opinion, advice, or recommendation:

- (a) the recitation of present existing facts;⁴
- (b) the recording of events;⁵
- (c) a statement of intention;⁶ or
- (d) an email from an inspector giving an instruction.⁷

18. During the review, the Agency advised it also relies on section 30(1) to refuse access to Document 1. Document 1 contains the terms of reference for a review to be undertaken by another Victorian government agency.

19. Document 2 contains V/Line's response to the IBAC investigation.

20. Having considered the content and context of the documents, I am satisfied they contain information in the nature of opinion, advice and recommendations prepared by Agency officers for the purpose of section 30(1).

21. However, I am not satisfied all information exempted from release by the Agency under section 30(1) meets the first limb of the exemption as I consider certain information constitutes a description of

² Section 30(3).

³ *Mildenhall v Department of Education* (1998) 14 VAR 87.

⁴ *Pullen v Alpine Resorts Commission* (unreported, AAT of Vic, Macnamara DP, 23 August 1996).

⁵ *Re City Parking Pty Ltd* (1996) 10 VAR 17.

⁶ *Ibid.*

⁷ *Pritchard v Victoria Police* [2008] VCAT 913 at [16].

actions taken by agencies, instructions from the Secretary of the Agency to another Victorian government agency and the recitation of existing facts.

Were the documents made in the course of, or for the purpose of, the deliberative processes involved in the functions of an agency or Minister or of the government?

22. The term ‘deliberative process’ is interpreted broadly and includes any of the processes of deliberation or consideration involved in the functions of an agency, Minister or government.⁸
23. In *Re Waterford and Department of Treasury (No.2)*,⁹ former Victorian Administrative Appeals Tribunal held:

... “deliberative processes” [is] wide enough to include any of the processes of deliberation or consideration involved in the functions of an agency... In short, ...its thinking processes — the processes of reflection, for example, upon the wisdom and expediency of a proposal, a particular decision or a course of action.

24. I am satisfied the information was provided in the course of the Agency’s deliberative processes in responding to an IBAC investigation.

Would disclosure of the documents be contrary to the public interest?

25. While I do not consider most information in the documents is opinion, advice, recommendation or consultation between Agency officers, for completeness, I have considered whether disclosure of the documents would be contrary to the public interest.
26. In determining if disclosure of the documents would be contrary to the public interest, I must consider all relevant facts and circumstances remaining mindful the object of the FOI Act is to facilitate and promote the disclosure of information. In doing so, I have given weight to the following relevant factors:¹⁰
- (a) the degree of sensitivity of the issues discussed in the documents and the broader context giving rise to the creation of the documents;
 - (b) the right of every person to gain access to documents under the FOI Act;
 - (c) the stage of a decision or status of policy development or a process being undertaken at the time the communications were made;
 - (d) whether disclosure of the documents would be likely to inhibit communications between Agency officers, essential for the Agency to make an informed and well-considered decision or participate fully and properly in a process in accordance with the Agency’s functions and other statutory obligations;
 - (e) whether disclosure of the documents would give merely a part explanation, rather than a complete explanation for the taking of a particular decision or the outcome of a process, which the Agency would not otherwise be able to explain upon disclosure of the documents;
 - (f) the impact of disclosing documents in draft form, including disclosure not clearly or accurately representing a final position or decision reached by the Agency at the conclusion of a decision or process; and

⁸ *Brog v Department of Premier and Cabinet* (1989) 3 VAR 201 at 208.

⁹ [1984] AATA 67; (1984) 5 ALD 588; 1 AAR 1 at [58].

¹⁰ *Hulls v Victorian Casino and Gambling Authority* (1998) 12 VAR 483.

- (g) the public interest in the community being better informed about the way in which the Agency carries out its functions, including its deliberative, consultative and decision making processes and whether the underlying issues require greater public scrutiny.

27. The Agency submits:

pages 157 – 173 of document [2] contain a draft version of V/Line’s response that is publicly available on IBAC’s website. Although the differences between the draft and final document appear minor, the decision to exempt the material reflects concerns expressed by V/Line and aims to preserve the integrity of the final response published by IBAC (and which was also enclosed with the decision letter). Any assessment of the material for release would likely involve side-by-side comparison with the final version, to exempt material not reflective of the final decided version – providing a partial version of what has already been released. It is not proposed to release the document at this time.

28. On balance, I am satisfied disclosure of the documents would not be contrary to the public interest for the following reasons:

- (a) As noted in the Agency’s submission, the exempt material in Document 2 is a draft version of V/Line’s response to the IBAC investigation and the final version is available on IBAC’s website. I have reviewed both versions and the documents contain a substantial amount of similar information. In my view the document subject to review clearly reflects the Agency’s final position on this matter. Accordingly, I am of the view the sensitivity of the information has decreased, where it is already publicly available.
- (b) I acknowledge the Agency’s submission that Document 1 relates to sensitive and contentious issues. However, I am of the view the contents of the document do not reveal any substantive or sensitive information. Rather, it provides a high-level summary of the purpose and scope of a project conducted by the Agency.
- (c) I do not consider the release of Document 1 would prejudice an ongoing project and I am satisfied the IBAC investigation is a separate and independent process. The distinction between the two processes is clearly described in Document 1.
- (d) I acknowledge Agency officers must be able to openly and fully communicate their opinions and thoughts to ensure decisions are made properly. However, having considered the nature of the information, I am of the view its disclosure would not inhibit Agency officers from engaging in similar communications in the future. In doing so, I note the obligations on public sector employees to comply with the public sector values in section 7 of the *Public Administration Act 2004* (Vic) including responsiveness, impartiality and accountability.
- (e) I am not satisfied disclosure of the relevant information in the documents would negatively impact upon the nature or quality of advice and recommendations prepared by Agency officers for future or similar projects. I note the views of the Victorian Civil and Administrative Tribunal (**VCAT**) in *Graze v Commissioner for State Revenue*,¹¹ which observed the possibility of public scrutiny in some circumstances provides for better administrative decision making.
- (f) Given the significance of the IBAC investigation into allegations of serious corrupt conduct, I consider there is a strong public interest in the release of the documents which show the Agency’s responses to allegations of serious corruption within the public transport sector.

29. Accordingly, I am not satisfied the documents are exempt from release under section 30(1).

30. My decision in relation to section 30(1) is set out in the Schedule of Documents in **Annexure 1**.

¹¹ [2013] VCAT 869 at [25]-[27].

Section 28(1)(c) – A document containing a draft, extract or copy of a Cabinet document

31. In relation to Cabinet documents and the exemptions available under section 28(1):

It has been said that a document is not exempt merely because it has some connection with Cabinet, or is perceived by departmental officers or others as being of a character that they believe ought be regarded as a Cabinet document or because it has some Cabinet “aroma” about it. Rather, for a document to come within the Cabinet document exemption, “it must fit squarely within one of the four exceptions” in section 28(1) of the Act.^[11] But the language used to describe the exemptions is itself open to different interpretations.¹²

32. Section 28(1)(c) provides a document is an exempt document if it is a copy or a draft of, or contains extracts from, a document referred to in sections 28(1)(a), 28(1)(b) or 28(1)(ba).

33. A document is exempt from release under sections 28(1)(a), 28(1)(b) and 28(1)(ba) exempt if it is:

- (a) the official record of any deliberation or decision of the Cabinet;
- (b) a document that has been prepared by a Minister or on his or her behalf or by an agency for the purpose of submission for consideration by the Cabinet;
- (ba) a document prepared for the purpose of briefing a Minister in relation to issues to be considered by the Cabinet;
- ...

34. A document will be a copy of a Cabinet document if it is a reproduction of a Cabinet document, for example, a photocopy of a Cabinet submission.

35. A draft Cabinet document is a ‘preliminary version’ of the document. A document will not be considered a draft simply because it was created before the relevant Cabinet document or because there is information common to both a document and a Cabinet document. The relevant document should be a draft of the *actual* Cabinet document, and be preferably marked as ‘draft’ and not documents of ‘different kinds prepared by different agencies’.¹³

36. In relation to an extract from a Cabinet document, a document will usually contain a reproduction of part of the text or material from a Cabinet document such as a quote, paraphrase, or summary. Simply referring to a Cabinet document is not sufficient.¹⁴

37. In relation to whether a document contains an extract from a Cabinet document for the purpose of section 28(1)(c), VCAT President Justice Morris held in *Honeywood v Department of Human Services*:¹⁵

The question of whether a document contains extracts from a Cabinet submission has not been authoritatively determined. In *Smith v Department of Sustainability and Environment*^[2] I commented that it would appear that a document cannot “contain extracts from” a Cabinet document if it was created before the preparation of the Cabinet document. In *Mildenhall v Department of Education*^[3] it was suggested that a document will “contain extracts from” a Cabinet document if it contains a quotation or paraphrase of that document. Commonly a document that is an extract from another document will contain an attribution to the other document, but I accept that the absence of an attribution will not be fatal. The question will need to be determined by reference to all the evidence. In particular, the absence of an attribution will not be fatal where there is direct evidence before the

¹² *Ryan v Department of Infrastructure* [2004] VCAT 2346 at [33] (per VCAT President Justice Morris) quoting *Birnbauer v Department of Industry Technology and Resources* [1986] 1 VAR 279.

¹³ *Asher v Department of Infrastructure* (2006) 25 VAR 143.

¹⁴ *Mildenhall v DoE* (unreported, VCAT, Glover M, 16 April 1999).

¹⁵ (General) [2006] VCAT 2048 at [19].

tribunal of a process of extracting content from a Cabinet submission to be included in a document which is claimed to be exempt under section 28(1)(c) of the Act.

38. In *Honey Smith v Department of Sustainability and Environment*,¹⁶ Justice Morris earlier held:

There was another claim for exemption advanced that I will briefly comment on. This was a claim under section 28(1)(c) of the Act. The respondent submitted that the KPMG report (dated March 2003) contained “extracts from” the Cabinet submission dated 7 May 2003. Clearly the Cabinet submission dated 7 May 2003 is a document that was prepared by a minister for the purpose of submission for consideration by Cabinet. However I cannot accept the argument that the KPMG Report contains “extracts from” that Cabinet submission. It is true that the Cabinet submission contains passages which are identical to passages in the KPMG Report. I would characterise the Cabinet submission as containing “extracts from” the KPMG Report. However I cannot accept the argument that the reverse would apply, as the KPMG Report was a predecessor in time of the Cabinet submission. Notwithstanding what might have been said by Deputy President Macnamara in *Mildenhall No (2)*,^[3] I would doubt that the expression “extracts from” could operate so as to apply to a document that was a predecessor of the document that was referred to in paragraphs (a), (b) or (ba) of section 28(1).^[4]

39. The Agency was invited to provide evidence to support its view Document 1 is exempt from release under section 28(1)(c).

40. [Details of the Agency’s submission]. However, the Agency did not provide [description of specific document] or OVIC’s consideration. I am limited in the amount of information I can provide about the submission provided to support the Agency’s decision in relation to section 28(1)(c) as to do so would reveal information the Agency considers exempt.

41. I acknowledge the document may form part of a Cabinet submission. However, Document 1 was created before any Cabinet submission was drafted. As noted in the VCAT decisions above, a document cannot contain extracts from a Cabinet document if it was created before the preparation of the Cabinet document.¹⁷

42. Having examined the document and the information provided by the Agency, I am not satisfied that it is a copy or a draft of, or contains extracts from, a document referred to in sections 28(1)(a), 28(1)(b) or 28(1)(b).

43. Accordingly, I am not satisfied the document is exempt from release under section 28(1)(c).

44. My decision in relation to section 28(1)(c) is set out in the Schedule of Documents in **Annexure 1**.

Section 28(1)(d) – Disclosure of a document would disclose any deliberation or decision of the Cabinet

45. Section 28(1)(d) provides a document is an exempt document if its disclosure would involve the disclosure of any deliberation or decision of the Cabinet, other than a document by which a decision of the Cabinet was officially published.

46. A document will be exempt under section 28(1)(d) if there is evidence the Cabinet discussed and determined options or issues set out in a document.¹⁸

47. A decision of the Cabinet includes a course of action set, or a determination made as to the final strategy for a matter or a conclusion as to how a matter should proceed.¹⁹

¹⁶ (General) [2006] VCAT 1228 at [28].

¹⁷ *Honeywood v Department of Human Services* (General) [2006] VCAT 2048 at [19]; *Honey Smith v Department of Sustainability and Environment* (General) [2006] VCAT 1228 at [28].

¹⁸ *Smith v Department of Sustainability and Environment* (2006) 25 VAR 65; [2006] VCAT 1228 at [23].

¹⁹ *Della-Riva v Department of Treasury and Finance* (2005) 23 VAR 396; [2005] VCAT 2083 at [30].

48. Where a decision made by the Cabinet is subsequently made public, as is usually the case, releasing information about the outcome of a Cabinet decision does not necessarily disclose a decision or any deliberation of the Cabinet for the purposes of section 28(1)(d).²⁰
49. The Agency advised that the Cabinet has not deliberated or made any decision in relation to the issues considered in Document 1.
50. As such, I am not satisfied that disclosure of the document would involve the disclosure of any deliberation or decision of the Cabinet, where no such deliberation or decision has occurred.
51. Accordingly, I am not satisfied the document is exempt from release under section 28(1)(d).
52. My decision in relation to section 28(1)(d) is set out in the Schedule of Documents in **Annexure 1**.

Section 28(1)(b) – A document prepared by a Minister or on his or her behalf or by an agency for the purpose of submission for consideration by the Cabinet

53. For the purposes of completeness, I will also consider the application of section 28(1)(b) to the document, as I consider the Agency's submission is most relevant to this exemption.
54. Section 28(1)(b) provides a document is an exempt document if it is a document that has been prepared by a Minister or on his or her behalf or by an agency for the purpose of submission for consideration by the Cabinet.
55. A document will only be exempt under section 28(1)(b) if the sole purpose, or one of the substantial purposes, for which it was prepared, was for submission to Cabinet for its consideration. In the absence of direct evidence, the sole or substantial purpose of a document may be determined by examining the use of the document, including whether it was submitted to Cabinet.²¹
56. VCAT has recognised section 28(1)(b) turns upon the purpose for which a document was created, and it is not necessary to show the document was submitted to Cabinet.²² Nor is it necessary to prove Cabinet considered the document to satisfy the requirements of section 28(1)(b).²³
57. As stated by Morris J in *Ryan v Department of Infrastructure*:²⁴

It is important to observe that section 28(1)(b) of the Act does not extend to a document merely because the document has been prepared for the purpose of submission to the Cabinet. Rather the purpose of the preparation of the document must be for submission for consideration by the Cabinet. Hence documents will not fall within the exemption in section 28(1)(b) of the Act just because they were prepared with the intention of physically placing them before the Cabinet. Rather it is necessary to ask whether, at the time a document was prepared, the only purpose, or one of the substantial purposes, for the preparation of the document was for the purpose of submission for *consideration by* the Cabinet.

58. The Cabinet briefing purpose must be 'immediately contemplated' when the document is created. The exemption cannot apply merely because the Cabinet ultimately considered an issue.²⁵

²⁰ *Honeywood v Department of Innovation, Industry and Regional Development* (2004) 21 VAR 1453; [2004] VCAT 1657 at [26].

²¹ *Secretary to the Department of Treasury and Finance v Della Riva* [2007] VSCA 11 at [15].

²² *Ryan v Department of Infrastructure* [2004] VCAT 2346 at [34], citing *Asher v Department of Premier and Cabinet* [2002] VCAT 499, at [9]; *Wilson v Department of Premier and Cabinet* [2001] VCAT 663; (2001) 16 VAR 455 at 459.

²³ *Ibid.*

²⁴ [2004] VCAT 2346 at [36].

²⁵ *Hennessy v Minister Responsible for the Establishment of an Anti-Corruption Commission* [2013] VCAT 822.

59. The Agency submits the document will form part of a submission that may be submitted to the Cabinet. However, the Agency has not provided a copy of the relevant Cabinet submission and I note the document was produced over 12 months ago and is yet to be considered by the Cabinet.
60. Having reviewed Document 1, there is nothing on the face of the document to suggest it was prepared for the sole or substantial purpose of being submitted for consideration by the Cabinet.
61. Without further evidence from the Agency to suggest otherwise, I am of the view the document was prepared for the substantial purpose of setting out the terms of reference for a review to be undertaken by another Victorian government agency.
62. I am not satisfied the Agency has provided sufficient evidence to support a finding this document was prepared for the sole or for the substantial purpose of submission for consideration by a committee of the Cabinet.
63. Accordingly, I am not satisfied the document is exempt under section 28(1)(b).
64. My decision in relation to section 28(1)(b) is set out in the Schedule of Documents in **Annexure 1**.

Section 25 – Deletion of exempt or irrelevant information

65. Section 25 requires an agency to grant access to an edited copy of a document where it is practicable to delete exempt or irrelevant information and the applicant agrees to receiving such a copy.
66. Determining what is ‘practicable’ requires consideration of the effort and editing involved in making the deletions ‘from a resources point of view’²⁶ and the effectiveness of the deletions. Where deletions would render a document meaningless, they are not ‘practicable’, and release of the document is not required under section 25.²⁷
67. As noted above, the Applicant does not seek access to the personal affairs information of third parties.
68. I have considered the effect of deleting irrelevant information from the documents. I am satisfied it is practicable to do so, as it would not require substantial time and effort, and the edited documents would retain meaning.

Conclusion

69. On the information before me, I am not satisfied the documents are exempt from release under sections 28(1)(b), 28(1)(c), 28(1)(d) and 30(1).
70. As I am satisfied it is practicable to provide the Applicant with an edited copy of the documents with irrelevant information deleted in accordance with section 25, access to the documents is granted in part.
71. The Schedule of Documents in **Annexure 1** sets out my decision in relation to each document.

²⁶ *Mickelborough v Victoria Police (General)* [2009] VCAT 2786 at [31]; *The Herald and Weekly Times Pty Limited v The Office of the Premier (General)* [2012] VCAT 967 at [82].

²⁷ *Honeywood v Department of Human Services* [2006] VCAT 2048 at [26]; *RFJ v Victoria Police FOI Division (Review and Regulation)* [2013] VCAT 1267 at [140] and [155].

Review rights

72. If either party to this review is not satisfied with my decision, they are entitled to apply to VCAT for it to be reviewed.²⁸
73. The Applicant may apply to VCAT for a review up to 60 days from the date they are given this Notice of Decision.²⁹
74. The Agency may apply to VCAT for a review up to 14 days from the date it is given this Notice of Decision.³⁰
75. Information about how to apply to VCAT is available online at www.vcat.vic.gov.au. Alternatively, VCAT may be contacted by email at admin@vcat.vic.gov.au or by telephone on 1300 018 228.
76. The Agency is required to notify the Information Commissioner in writing as soon as practicable if either party applies to VCAT for a review of my decision.³¹

When this decision takes effect

77. My decision does not take effect until the Agency's 14 day review period expires.
78. If a review application is made to VCAT, my decision will be subject to any VCAT determination.

²⁸ The Applicant in section 50(1)(b) and the Agency in section 50(3D).

²⁹ Section 52(5).

³⁰ Section 52(9).

³¹ Sections 50(3F) and 50(3FA).

Annexure 1 – Schedule of Documents

Document No.	Date of Document	Document Description	No. of pages	Agency Decision	OVIC Decision	OVIC Comments
1.	[date]	Terms of Reference	6	<p>Refused in full</p> <p>Sections 28(1)(c), 28(1)(d)</p>	<p>Release in part</p> <p>Section 25</p> <p>The document is to be released except for the irrelevant personal affairs information on page six of the document which is to be deleted in accordance with section 25.</p>	<p>Section 30(1): For the reasons outlined in the Notice of Decision, I am not satisfied that information in this document is exempt under section 30(1).</p> <p>Section 28(1)(c): For the reasons outlined in the Notice of Decision, I am not satisfied this document is exempt from release under section 28(1)(c).</p> <p>Section 28(1)(d): For the reasons outlined in the Notice of Decision, I am not satisfied this document is exempt from release under section 28(1)(d).</p> <p>Section 28(1)(b): For the reasons outlined in the Notice of Decision, I am not satisfied this document is exempt from release under section 28(1)(b).</p> <p>Section 25: The Applicant does not seek access to the personal affairs information of third parties.</p> <p>I am satisfied it is practicable to provide the Applicant with an edited copy of this document with irrelevant information deleted in accordance with section 25.</p>

Document No.	Date of Document	Document Description	No. of pages	Agency Decision	OVIC Decision	OVIC Comments
2.	[date]	Ministerial Brief	178	Release in part Sections 30(1), 33(1)	Release in part Section 25 The document is to be released except for the irrelevant personal affairs information, which is to be deleted in accordance with section 25.	Section 30(1): See comments for Document 1. Section 25: See comments for Document 1.