Countryside Agencies' Open Information Network
Environmental Information Regulations Guidance Note No 1

The 'Environmental Exception' and access to information on sensitive features

Version

V1.3.3

Introduction

This document provides guidance for public bodies (particularly the Countryside Agencies) when managing public access to biodiversity information under the Environmental Information Regulations 2004.

Legal Framework and Conservation Background

The Environmental Information Regulations 2004 give public bodies, a legal duty to give free access to their environmental[1] information[2]. The regulations were created to enable compliance with the UK's commitments under the Aarhus Convention on Access to Information, Public Participation in Decision-making, and Access to Justice in Environmental Matters, and with the EU Directive 2003/4/EC on public access to environmental information. However, the Regulations list a number of potential exceptions allowing a public body to withhold the release of information. One of these exceptions relates to Regulation 12(5)(g): -

Regulation 12(5)(g) says:

(5) For the purposes of paragraph (1)(a), a public body may refuse to disclose information to the extent that its disclosure would adversely affect -

(g) the protection of the environment to which the information relates

However, this is not an absolute exception, in each case the decision to withhold must be subject to a 'public interest test'.

The Environmental Exception can be used to withhold information in a range of circumstances, including, for example, details of sites prior to legal designation, or to avoid harm caused by damage to important partnerships with landowners or volunteer recorders.

However, in practice it usually applies to 'sensitive features' which may be at risk of harm if particular information about their location is released to the public. Sensitive features are species, habitats or geological formations which, due to factors such as rarity, fragility or attractiveness, are particularly vulnerable to harm caused by collecting, damage, disturbance or commercial exploitation. Examples include, the detailed locations of hen harrier nests or the location of Killarney fern populations. Note that while the principles and criteria presented

[1] 'Environmental' is taken to mean any aspect of species, habitats, geological features and details of the physio-chemical environment and the interrelations between and within these.
[2] 'Information' in this context refers to raw data, aggregated data, products created from these (interpretations) as well as descriptive text. The terms 'information', 'data' and 'dataset' will be used interchangeably.

here may also be applicable to other sorts of information (eg. Archaeological features) they have been developed specifically with biodiversity information in mind.

This exception must be considered alongside other legal exceptions which may also apply, for example, commercial confidentiality, health and safety or intellectual property rights.

Background to the Guidance Note

DEFRA and the Information Commissioner's Office (ICO) have published guidance on the interpretation of EIR 2004. However, this guidance is general in nature, and the Countryside Agencies' Open Information Network[3] has recognised the need for more detailed, sector specific guidance for those bodies that deal primarily with biodiversity information.

Therefore, the Network are publishing a series of EIR Guidance Notes to aid the development of a legally valid, consistent and defendable approach. The Information Commissioner's Office has reviewed the Guidance Note and accepts it as valid, sector specific advice.

Current membership of the Countryside Agencies Open Information Network		
Countryside Agency	English Nature	
Countryside Council for Wales	Forestry Commission	Scottish Natural Heritage
Joint Nature Conservation Committee	National Biodiversity Network Trust	
Environment and Heritage Service Northern Ireland		
Invited organisations		
Information Commissioner's Office	DEFRA	Environment Agency
Scottish Executive		

Principles

The Network supports the principle that, wherever possible, environmental information should be freely available to all. Generally this benefits the environment by increasing awareness, enabling better decision-making and reducing risk of damage.

However, in a small number of cases, public access to information can result in environmental harm. The Network recognises that in such cases, availability of information may need to be controlled; although the presumption remains in favour of release and restrictions will be interpreted narrowly.

Good Practice

The following points represent the Network's standard of good practice for managing 'sensitive information'.

1) **Identify sensitive environmental information**
   As a first step, information holders need to identify any information which is regarded as 'sensitive'. Sensitive information is any which, if released to the public would result in an 'adverse effect' on the feature in question. A number of factors need to be taken into account when determining sensitivity, including type and level of threat, vulnerability of the feature, type of information, and whether it is already publicly

[3] The Network is an inter-agency group, set up in 2004, which exists to share experience and good practice in the area of open access to information.

available.

Therefore, the Network supports a criteria-driven approach to identifying sensitive information. The criteria and how to use them are described on page 5.

2) **Maintain a list of sensitive features**
The practical implementation of the criteria within an organisation may be made more efficient through the adoption of a 'sensitive feature list', i.e. an agreed list of those features and information types that are considered sensitive by that organisation, based on the criteria on page 5. The list would provide guidance to staff and promote a consistent approach to the issue. However, inclusion on the list does not imply automatic confidentiality in all cases, as each request for sensitive information would need to be considered independently and be subject to a public interest test – see below. The list should be reviewed regularly in the light of changes in the condition of the features or the nature of the threat they are under.

3) **Maintain adequate descriptions of datasets and document access issues**
All datasets (whether single information sources or collations) should be accompanied by good quality metadata. This would include information on, for example, originator/owner, creation dates, subject matter, collection methods, etc.

In particular, there should be a clear documentation of the 'Access Constraints' which could include, for example, an indication of which parts of the dataset are sensitive (if any), reasons for sensitivity and conditions under which release is possible.

4) **Release as much information as possible**
It is not justifiable to withhold an entire dataset simply because it contains some sensitive information. Where there is a mixture of information of differing sensitivity, reasonable efforts should be make to separate out or redact (black-out/delete) sensitive parts. New datasets should be provided in a format in which sensitive and non-sensitive information can be easily separated, for example, in a report, sensitive information may be presented in a separate 'confidential appendix'.

In addition, it may be possible to release sensitive information under certain conditions, for example, at a coarser geographic scale which does not reveal the exact location, or in some other summary format. Where the cost of doing this will be significant these would need to be borne by the third party requesting access.

5) **Communicate and negotiate with third party information providers**
Countryside Agencies hold information which belongs to third parties and has been voluntarily provided to the agency (e.g. from individual volunteer recorders, voluntary-sector organisations or landowners). The third party may hold a different view to the Agency about the sensitivity and access constraints of a given dataset. Although the Agency can take the third party's view into consideration, there may be circumstances when it may be obliged by law to release the information to the public against the third party's wishes.

Wherever possible, third party information providers should be informed of this situation and their views established. If there is a difference of opinion, the Agency should make efforts to negotiate, identifying genuine (rather than perceived) risks, in order to come to an agreement. If this is not possible, then any disparity should be

recorded. In certain cases, the Agency may decide to return or refuse to accept the information.

Please also see Countryside Agencies' Open Information Network EIR Guidance Note No 2.

6) Ensure appropriate storage and dissemination of information

Sensitive information shall be stored securely. All sensitive/confidential information should be labelled as such and, if necessary, kept in separate, locked filing systems, or password protected folders or databases with limited staff access.

Sensitive information should not be published or otherwise disseminated. Those responsible for such activities within an organisation e.g. staff involved in publications, interpretation, PR, libraries or web-sites need to understand and apply the Agency's policy on sensitive information.

7) Adopt a pragmatic approach to historical information

These good practice standards should be applied to all new datasets received by an Agency. Ideally, the same standards should also be applied to historic datasets, however, in many cases the size of the backlog is so great that the task would be impractical (at least in the short term). Therefore, it is recommended that priority is given to certain key datasets, for example, those which are used regularly or have formed the basis of key decisions or advice, and those which are requested by the public.

8) Promote approach across conservation sector

The Network members will promote these good practice standards throughout their own organisation and across the conservation sector, including to stakeholders and other partners. Successful promotion is critical if the trust within the sector is to be maintained.

9) Apply the public interest test

When a request for sensitive information is received and a public body is minded to refuse the request, then the 'public interest test' must be applied. That is, if the public interest in disclosing the information outweighs the public interest in withholding it, the information must be disclosed. The criteria on page 5 should be used to aid the decision-making process.

10) Restricted Release of Environmentally Sensitive Information

There are circumstances where environmentally sensitive information, that would normally be withheld, may need to be released to specific individuals for an environmental benefit, eg environmental consultants undertaking environmental impact assessments (EIAs].

You cannot release such information in response to an EIR request, as this would make it publicly available, so you can provide it under a licence, with specific conditions. However, refusal to release under the EIRs must be justified. The refusal must be legitimate and formal and should not be reduced to a 'paper exercise'. See EIR Guidance Note 4 - Restricted Release of Sensitive Information for details.

References

DEFRA (2005 – Chapter 7, Guidance for the Environmental Information Regulations 2004, Department for Environment, Food and Rural Affairs.
ICO (2004) – An Introduction to the EIR exceptions, Information Commissioner's Office.
Steve Wilkinson (2004) – Internal document on Refusing disclosure of information to protect the environment, Draft, Joint Nature Conservation Committee.
Peter Coutts (2005) – Internal Guidance on the EIR exceptions, Draft, Countryside Council for Wales.

Criteria for sensitive features and datasets

Column A describes 10 criteria which indicate when a feature or a dataset can be regarded as 'sensitive'. The criteria have been listed in approximate order of importance. They should be used as part of a risk assessment on whether an 'adverse effect' would occur if the information was released. An integral part of this will be considering the scale of any impact as well as the likelihood of it occurring. Release should only be granted following the application of the public interest test.

The criteria are designed for use in association with the best practice guidance (above) and not in isolation. They should be used as a guide only and are not a substitute for professional judgement.

1. **Risk of Harm** An assessment of whether the taxon is subject to harmful human activity.
2. **Impact of Harm** An assessment of the sensitivity of the taxon to the harmful human activity.
3. **Sensitivity of Data** An assessment on whether the release of data will increase harm.
4. **Decision on release & Category of sensitivity** A balanced decision regarding the release of the data and a determination of the category of sensitivity, and thus the level of generalisation, of the data for release.

Criteria For Assessing The Environmental Sensitivity Of Data		
A: Criterion (Indication of 'sensitivity')	**B: Explanation**	**C: Examples**
Step 1 : Risk of Harm Occurring - An assessment of whether the feature is at risk from a harmful human activity.		

1.1	The feature is at risk from a damaging human activity, which is affected by public availability of information.	Most features at risk are attractive, interesting, desirable or rare. Types of activity which could cause environmental harm include: - • Disturbance to birds or mammals by people wanting to see them at close quarters; • Trampling caused by visitors viewing or photographing plants; • Collecting of invertebrates, plants or birds' eggs. • Badger baiting or illegal hunting; • Persecution of raptors; • Commercial exploitation of scarce species. Releasing information about such features could increase the level of activity and thus the extent of the harm.	• Golden Oriole are sought after by both egg collectors and bird watchers and are very vulnerable to disturbance. • Killarney Fern is naturally rare and prized by gardeners, and specimens are at risk of being dug up by collectors.
1.2	There is established evidence of current or recent harmful activity to the feature.	This test of harm is stronger than that in the Freedom of Information Act 2000, in which some exemptions apply if the information '*would, or would be likely to, prejudice...'. Therefore, there must be appropriate evidence to support the probability of harm, not merely an assertion or feeling of harm. Appropriate evidence could include an evidence-based risk analysis that takes into account the probability and the potential impact of misuse of that information.	In some places, activities such as badger baiting or egg collecting were once common but are now virtually unknown. The fear of harm may remain, but this is unlikely to be sufficient grounds to withhold information.
Step 2 : Impact of Harm - An assessment of the vulnerability of the feature to the harmful human activity.			
2.1	The feature has characteristics that make it particularly vulnerable to the harmful activity.	Thriving populations of common species can recover from occasional incidents of harm, and these would not meet this criterion. However, other features are vulnerable to even small levels of damage, because for example:- • Small population size; • Population which is already in decline or threatened; • Very localised UK distribution or a large percentage of the feature occurs in a single location;	Fresh-water pearl-mussel is already on the verge of extinction in Wales. Illegal pearl-fishing kills the mussels and can wipe out local populations.

		• Low reproductive rate; • Newly colonised in an area; • Particularly fragile and slow to recover from damage; • The harm is particularly catastrophic to the feature. The fact that the feature is legally protected or scheduled, appears on a list of conservation concern or in a Red Data Book, is alone, *insufficient* to meet this criterion.	
2.2	The feature is at risk in the area/region in question.	It is not appropriate to apply a national blanket policy, so it is important to identify where a feature is at risk and where it is not. For example, a species may be relatively common in England but rare in Wales; similarly, badger digging may be a particular problem in one region or county but not elsewhere. Furthermore, certain sites provide a high level of physical protection, for example, by using wardens. Therefore, in regions and sites where the feature is not at risk, in general information should be released freely. (NB. Legislative protection e.g. site designated as SSSI, does not necessarily provide actual physical protection.)	Sites where the Large Blue butterfly has been introduced are carefully wardened, so release of these locations is acceptable.
Step 3 : Assess the Impact of Releasing Data - An assessment on whether the release of wildlife data will increase harm.			
3.1	The information is of a type which could actually enable someone to carry out a harmful activity.	For most sensitive species, it is only information that describes the ***actual location*** of the nest or plant population etc that could lead to harm. In general, most other information will confer little or no advantage on someone seeking to locate a feature or carry out a particular activity, and withholding such information can rarely by justified. E.g. general ecological information, research findings, conservation plans and objectives etc. Furthermore, many species are only vulnerable during part of their lifecycle, for example, during the breeding period when threats like disturbance or egg-collecting may apply. Therefore, in general, information relating to the rest of the lifecycle should not be restricted.	• For otter, the location of active holts may be considered sensitive, but a report describing the ecology, location of spraints, distribution and future conservation plans for otter in an area may not. • Although the sporophyte (spore-producing) phase of Killarney Fern is rare and collectable, the gametophyte phase is more common and of little interest. Therefore, there are few grounds for withholding information about the

			location of gametophytes.
3.2	The information is at a precision or scale that allows someone to accurately locate the feature.	If information about locations of sensitive features is presented at a detailed or large-scale (e.g. 6-figure grid reference, or point data on a 1:25,000 scale map) it will, in most cases, allow the feature to be easily located, and disclosure may be harmful. However, information presented at a coarse or small-scale or in a vague or aggregated way (e.g. 2-figure grid-reference, occurrence represented on a 10km square grid) will, in most cases, confer little or no advantage in enabling someone to locate the feature, and it may be safely released. Other similar issues may also apply. For example, the location of a sighting of a very mobile or migratory species may confer little advantage in relocating that species. Whereas, the opposite would apply to a species which was site-faithful or exhibited very predictable behaviour.	The location of Grey Seal pupping sites is unlikely to be considered sensitive providing it is released at a scale of 10km sq or coarser, but could be if released at a more detailed scale.
3.3	Disclosure would allow the locations of sensitive features to be derived through combination with other information sources.	In some case, a sensitive feature may be closely correlated in the field with some other non-sensitive habitat, species or geological formation. Therefore, it may be possible for an individual to derive detailed locations for a sensitive feature indirectly using a combination of information sources. It is important to consider this when responding to multiple requests for information.	The Dark Bordered Beauty moth is highly collectable and threatened. It is associated with Aspen. Thus, releasing detailed locations of Aspen and vague locations of Dark Bordered Beauty may allow the exact locations of the latter to be derived.
3.4	Disclosure would damage the ability of a conservation organisation to achieve a specific conservation objective.	Sometimes it is necessary to take very pragmatic decisions to achieve conservation aims and objectives. On rare occasions, it may be necessary to refuse to release biodiversity information, because it would compromise a scientific study or significantly damage relationships with others (e.g. landowners, volunteer information providers), without whose support it would not be possible to achieve the desired end. It is necessary to state clearly what the adverse effects would be. This criterion can be applied over any length of time and so includes longer-term objectives.	A landowner does not want a Salmon survey made public for fear of illegal fishing, and threatens to break off communication with the Agency. The Agency does not regard Salmon as a sensitive species but withholds the information on the grounds that it is dependent on the landowner's cooperation to achieve important conservation objectives and avoid harm to the river.

3.5	The information is *not* already publicly available.	Much biodiversity information is already widely available and it is nonsensical to be secretive for the sake of it. The location of species at 'honeypot' sites is an example. Also, consider whether information is circulating freely within the community of people likely to cause the harm, even if it is not more widely known. However, limited publication, such as where there is a restricted distribution list should not alone be construed as being '*widely available'*. There is no need to allow general release of information in such cases.	The existence of Ospreys at Loch Garten nature reserve in Scotland is well known and publicised.
Step 4 : Balanced Decision to Release, Restrict or Withhold Access to Data			
A	On balance, releasing information would *not* increase the risk of harm to the feature.		•
B	On balance, restricting access to the full detail of data would *not* increase the risk of harm to the feature.		•
C	On balance, withholding information would *not* increase the risk of harm to the feature.	In some instances, withholding sensitive information can cause more harm than good. For example: - • Ignorance about the location of a feature can increase the risk of accidental or inadvertent damage. • If the presence of a sensitive feature is widely known, more people can watch out for potential harm. • On SSSIs an offence is only committed if a landowner or third party *intentionally* causes damages. So full knowledge of the protected features nullifies a defence of inadvertent damage. In such cases, the risks caused by withholding information should be weighed against the benefits.	• Rare deadwood invertebrates may be destroyed by landowners innocently clearing and burning fallen timber, unless they are informed of their presence. • Urban badger setts often benefit from being watched over by sympathetic human neighbours.

Version	Date	Comments
1	19/01/2005	First draft produced by Steve Wilkinson (JNCC). This was created following a meeting of the Countryside Agencies' Open Information Network with representatives from EN, SNH, CCW, EHS, JNCC, NBNT and FC. It was based on a document which was circulated at the meeting to generate discussion. Original material was derived from the NBN's document on data exchange principles.
1.1 WORKING COPY	8/6/2005	Second draft produced by Steve Wilkinson and Kathryn Hewitt (CCW) following comments from the Network meeting of the 9th March and subsequent consultation. WORKING COPY
1.2	3/8/2005	Minor changes in response to suggestions from the Countryside Agencies' Open Information Network
1.3	13/11/2007	Some reordering of the criteria to provide a more logical framework to better aid decision-makers

Annex A

Annex 1 – Example form which could be used to maintain an audit trail around decisions relating to requests for release of information under EIR.

Assessment of feature sensitivity to the release of Information under The Environmental Information Regulations 2004 **Part 1 of 2**										
Reference										
Feature										
Information										
Date										
Status	**Draft/Final***									
Opinion	It is the opinion of [Insert name of Public Body] that the feature to which the release of the information relates **is/is not*** sensitive to that information release and therefore is to be **withheld/released** under the Regulations. This opinion is based on the assessment carried out on criteria 1–10 in Part 2 of this document. Accordingly, but subject to any direction to the contrary the information **will/will not*** be made generally available to the public as of the date of this opinion.									
The table in Part 2 describes 10 criteria which have been summarised here. These criteria are considered by [Insert name of Public Body] to indicate when a feature or a dataset can be regarded as 'sensitive'. The criteria have been listed in approximate order of importance. They were used as a guide when assessing whether an 'adverse effect' would occur if the information was released. Release should only be granted following the application of the public interest test. The criteria are designed for use in association with the best practice guidance. They should be used as a guide only and are not a substitute for professional judgement. This opinion shall not be used as a statement of opinion unless its status is marked 'Final'.										
Sensitive ✓✗?	**Assessment for the feature and information in question to be considered 'sensitive'**									
Criterion	**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**	**10**
Result										

Part 2 of 2 – Criterion Assessment				
	A: Criterion (Indication of 'sensitivity')	**B: Explanation**	**C: Conclusion**	**D: Assessment of Sensitivity – Yes/No**
1	The feature is at risk from a damaging human activity, which is affected by public availability of information.	Most features at risk are attractive, interesting, desirable or rare. Types of activity which could cause environmental harm include: - • Disturbance to birds or mammals by people wanting to see them at close quarters; • Trampling caused by visitors viewing or photographing plants; • Collecting of invertebrates, plants or birds' eggs. • Badger baiting or illegal hunting; • Persecution of raptors; • Commercial exploitation of scarce species. Releasing information about such features could increase the level of activity and thus the extent of the harm.		
2	The feature has characteristics that make it particularly vulnerable to the harmful activity.	Thriving populations of common species can recover from occasional incidents of harm, and these would not meet this criterion. However, other features are vulnerable to even small levels of damage, because for example:- • Small population size; • Population which is already in decline or threatened; • Very localised UK distribution or a large percentage of the feature occurs in a single location; • Low reproductive rate; • Newly colonised in an area; • Particularly fragile and slow to recover from damage; • The harm is particularly catastrophic to the feature. The fact that the feature is legally protected or scheduled, appears on a list of conservation concern or in a Red Data Book, is alone, *insufficient* to meet this criterion.		

Part 2 of 2 – Criterion Assessment				
	A: Criterion (Indication of 'sensitivity')	**B: Explanation**	**C: Conclusion**	**D: Assessment of Sensitivity – Yes/No**
3	There is established evidence of current or recent harmful activity to the feature.	This test of harm is stronger than that in the Freedom of Information Act 2000, in which some exemptions apply if the information '*would, or would be likely to, prejudice...'. Therefore, there must be appropriate evidence to support the probability of harm, not merely an assertion or feeling of harm. Appropriate evidence could include an evidence-based risk analysis that takes into account the probability and the potential impact of misuse of that information.		
4	The information is of a type which could actually enable someone to carry out a harmful activity.	For most sensitive species, it is only information that describes the ***actual location*** of the nest or plant population etc that could lead to harm. In general, most other information will confer little or no advantage on someone seeking to locate a feature or carry out a particular activity, and withholding such information can rarely by justified. E.g. general ecological information, research findings, conservation plans and objectives etc. Furthermore, many species are only vulnerable during part of their lifecycle, for example, during the breeding period when threats like disturbance or egg-collecting may apply. Therefore, in general, information relating to the rest of the lifecycle should not be restricted.		

Part 2 of 2 – Criterion Assessment				
	A: Criterion (Indication of 'sensitivity')	**B: Explanation**	**C: Conclusion**	**D: Assessment of Sensitivity – Yes/No**
5	The information is at a precision or scale that allows someone to accurately locate the feature.	If information about locations of sensitive features is presented at a detailed or large-scale (e.g. 6-figure grid reference, or point data on a 1:25,000 scale map) it will, in most cases, allow the feature to be easily located, and disclosure may be harmful. However, information presented at a coarse or small-scale or in a vague or aggregated way (e.g. 2-figure grid-reference, occurrence represented on a 10km square grid) will, in most cases, confer little or no advantage in enabling someone to locate the feature, and it may be safely released. Other similar issues may also apply. For example, the location of a sighting of a very mobile or migratory species may confer little advantage in relocating that species. Whereas, the opposite would apply to a species which was site-faithful or exhibited very predictable behaviour.		
6	The feature is at risk in the area/region in question.	It is not appropriate to apply a national blanket policy, so it is important to identify where a feature is at risk and where it is not. For example, a species may be relatively common in England but rare in Wales; similarly, badger digging may be a particular problem in one region or county but not elsewhere. Furthermore, certain sites provide a high level of physical protection, for example, by using wardens. Therefore, in regions and sites where the feature is not at risk, in general information should be released freely. (NB. Legislative protection e.g. site designated as SSSI, does not necessarily provide actual physical protection.)		

Part 2 of 2 – Criterion Assessment				
	A: Criterion (Indication of 'sensitivity')	**B: Explanation**	**C: Conclusion**	**D: Assessment of Sensitivity – Yes/No**
7	On balance, witholding information would *not* increase the risk of harm to the feature.	In some instances, withholding sensitive information can cause more harm than good. For example: - • Ignorance about the location of a feature can increase the risk of accidental or inadvertent damage. • If the presence of a sensitive feature is widely known, more people can watch out for potential harm. • On SSSIs an offence is only committed if a landowner or third party *intentionally* causes damages. So full knowledge of the protected features nullifies a defence of inadvertent damage. In such cases, the risks caused by withholding information should be weighed against the benefits.		
8	The information is *not* already widely publicly available	Much biodiversity information is already widely publicly available and it is nonsensical to be secretive for the sake of it. The location of species at 'honeypot' sites is an example. Also, consider whether information is circulating freely within the community of people likely to cause the harm, even if it is not more widely known. However, limited publication, such as where there is a restricted distribution list should not alone be construed as being '*widely available'*. There is no need to allow general release of information in such cases.		

Part 2 of 2 – Criterion Assessment				
	A: Criterion (Indication of 'sensitivity')	**B: Explanation**	**C: Conclusion**	**D: Assessment of Sensitivity – Yes/No**
9	Disclosure would damage the ability of a conservation organisation to achieve a specific conservation objective.	Sometimes it is necessary to take very pragmatic decisions to achieve conservation aims and objectives. On rare occasions, it may be necessary to refuse to release biodiversity information, because it would compromise a scientific study or significantly damage relationships with others (e.g. landowners, volunteer information providers), without whose support it would not be possible to achieve the desired end. It is necessary to state clearly what the adverse effects would be. This criterion can be applied over any length of time and so includes longer-term objectives.		
10	Disclosure would allow the locations of sensitive features to be derived through combination with other information sources.	In some case, a sensitive feature may be closely correlated in the field with some other non-sensitive habitat, species or geological formation. Therefore, it may be possible for an individual to derive detailed locations for a sensitive feature indirectly using a combination of information sources. It is important to consider this when responding to multiple requests for information.		