

**Freedom of Information Act 2000 (FOIA)  
Environmental Information Regulations 2004 (EIR)**

**Decision notice**

**Date:** 31 March 2026

**Public Authority:** Department for Energy Security & Net Zero  
3-8 Whitehall Place  
London  
SW1A 2EG

**Decision (including any steps ordered)**

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1. The complainant requested information from the Department for Energy Security & Net Zero (DESNZ) related to chemtrails.
2. The Commissioner's decision is that, on the balance of probabilities, DESNZ does not hold the requested information. Regulation 12(4)(a) of the EIR therefore applies to the request. DESNZ complied with its duties under regulation 9 (advice and assistance) and but breached regulation 10 (transfer of request).
3. The Commissioner does not require DESNZ to take any steps.

## Background

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4. DESNZ advised the Commissioner 'chemtrails' refers to a conspiracy theory claiming that the white trails seen behind high altitude aircraft on a clear day contain secret chemical sprays intended for a covert atmospheric spraying programme, such as for weather modification or population control. DESNZ stated there is no evidence for this and that such claims spread misinformation<sup>1</sup>. DESNZ explained that these white trails are in fact water vapour condensation trails as explained in this article on the government website<sup>2</sup>.
5. DESNZ further advised the Commissioner that 'geoengineering' is a broad term encompassing greenhouse gas removal technologies (GGRs), which remove greenhouse gases from the atmosphere, and solar radiation modification (SRM), which describes a proposed set of technologies that could cool the Earth largely by reflecting some of the Sun's energy back into space. DESNZ advised the Commissioner that the UK Government is not in favour of using SRM, citing uncertainties and risks, and has no plans to deploy it<sup>3</sup>.
6. DESNZ advised the Commissioner that ARIA was created by an Act of Parliament, and is sponsored by the Department for Science, Innovation, and Technology. ARIA's website<sup>4</sup> says it "empowers scientists and engineers to pursue research that is too speculative, too hard, or too interdisciplinary to pursue elsewhere". DESNZ advised that ARIA's "Exploring Climate Cooling" programme<sup>5</sup> does not fund deployment of SRM or research to facilitate deployment. ARIA is not involved in chemtrail activity or deliberate chemical spraying in the UK.

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<sup>1</sup> <https://weather.metoffice.gov.uk/climate-change/atmospheric-modification-and-geoengineering>

<sup>2</sup> <https://www.gov.uk/government/publications/contrails-and-chemtrails-frequently-asked-questions/contrails>

<sup>3</sup> <https://www.gov.uk/government/publications/geo-engineering-research-the-government-s-view/uk-governments-view-on-greenhouse-gas-removal-technologies-and-solar-radiation-management>

<sup>4</sup> <https://aria.org.uk/about-aria/>

<sup>5</sup> <https://www.aria.org.uk/opportunity-spaces/future-proofing-our-climate-and-weather/exploring-climate-cooling/>

It also stated that ARIA's Exploring Climate Cooling programme does not fund technologies to "dim the sun". Instead, it supports cautious, controlled research to understand scientific processes<sup>6</sup>.

## Request and response

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7. The complainant made the following information request to DESNZ on 25 April 2025:

"I would like to know about the Geo-Engineering that has been published recently, specifically about the 'Chemtrails'. I would like to know the following:

1.

a: What Chemicals/Compounds are used in them, and any other Ingredients?

b: A breakdown, by percentage of the amount of what Ingredients are used?

c: How long has it been going on, and has the Chemical make-up changed?

d: If the Chemical make-up has changed, what was used previously?

2.

a: Which company/companies has the contract to do the spraying?

b: How often are they sprayed and for how long?

c: When did the meeting/s take place to decide this, and every person who was in the meeting/s?

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<sup>6</sup> <https://www.aria.org.uk/opportunity-spaces/future-proofing-our-climate-and-weather/exploring-climate-cooling/faqs/>

If you can, I would like to know whatever relevant information you have for the past 10 years on the subject, if not, the most up to date info would suffice.”

8. On 7 May 2025, DESNZ responded to the request saying “the Department holds no information in scope.” It explained to the complainant that ‘chemtrails’ are aircraft water vapour condensation trails or contrails. It offered the following explanation to the complainant:

“There is no deliberate chemical spraying being carried out in the skies over the UK as part of a geoengineering programme or using technologies typically collectively referred to as solar radiation modification (SRM). The only spraying activity that is permitted is regulated aerial spraying of pesticides and herbicides in agricultural practices: <https://www.hse.gov.uk/pesticides/using-pesticides/general/aerial-spraying.htm>. Crop spraying is always carried out at low altitude.

‘Chemtrails’ is a term used by some people who claim that the white trails often seen trailing behind high altitude aircraft on a clear day contain undisclosed chemical agents intended for a covert atmospheric spraying programme. These white trails are in fact water vapour condensation trails as explained in this article on the government website: <https://www.gov.uk/government/publications/contrails-and-chemtrails-frequently-asked-questions/contrails>

The Government’s policy position is that it is not deploying SRM and has no plans in place to do so.”

9. On 12 May 2025, the complainant submitted an internal review request and raised several issues about DESNZ’s initial response as follows:

“You said there is no deliberate spraying being carried out in the skies over the UK. I find this to be untrue, the ARIA project to ‘dim the sun’ I was referring to must use some kind of Chemical/Compound to block out the Sun.

I would like to know what they are please. I would be grateful if you could answer the questions that I asked in the original E-mail”.

10. On 6 June 2025, DESNZ responded and upheld its position that it did not hold any information. It said:

"The Department's above response is consistent with what the Government has always maintained; that it is not deploying SRM and has no plans in place to do so. Therefore, no information was held that would have answered your request. I am not aware of any evidence that there has been deliberate chemical spraying in UK skies for purposes of geoengineering."

11. As regards the complainant's queries in his request for internal review (ie: 'the ARIA project to 'dim the sun' I was referring to'), DESNZ provided the following advice and assistance to the complainant about the ARIA programme:

Your original request did not specify any reference to ARIA's recently announced programme and the ARIA programme makes no mention of 'chemtrails,' therefore this does not change the Department's previous response.

ARIA's Exploring Climate Cooling programme does not fund deployment of SRM, large or sustained field trials, or research to facilitate deployment of technologies to "dim the sun". The programme will conduct cautious, controlled research to gather critical missing scientific data to better understand the risks and impacts of potential climate cooling approaches, including SRM. The focus is strictly on foundational research to understand fundamental scientific processes, including modelling, monitoring and observation and, where necessary, carefully controlled, small-scale outdoor experiments. These small-scale experiments will be subject to strict oversight and governance, tightly constrained in size, scale and duration, and will be subject to an environmental impact and legal assessment to be made publicly available before the experiment takes place.

More detail can be found on ARIA's website: see <https://www.aria.org.uk/opportunity-spaces/future-proofing-our-climate-and-weather/exploring-climate-cooling/>. "

## Scope of the case

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12. The complainant complained to the Commissioner about the handling of the request on 3 July 2025. The complainant did not accept that DESNZ did not hold any information falling within the scope of their request. They said:

"I have seen multiple articles about 'Dimming the sun', I questioned what was being sprayed to achieve this and I got told there is no

deliberate chemical spraying taking place, I do not agree with the response I got. I would like to have the true answers to the questions I originally asked”

13. The Commissioner considers that the scope of his investigation is to consider:
- whether DESNZ holds information within the scope of the request;
  - whether DESNZ provided the complainant with reasonable advice and assistance under regulation 9; and
  - whether DESNZ complied with regulation 10 (transfer of requests) in responding to the request.

## **Reasons for decision**

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### **Regulation 12(4)(a) – information not held**

14. Under regulation 5(1) of the EIR and subject to a number of EIR provisions, a public authority that holds environmental information shall make it available on request.
15. Regulation 12(4)(a) of the EIR states that a public authority may refuse to disclose information “to the extent that it does not hold that information when an applicant’s request is received.”
16. In cases where there is a dispute over whether information is held, the Commissioner applies the civil test of the balance of probabilities in making his determination. The Commissioner is not required to prove beyond doubt that DESNZ do or do not hold the information. Following the case of O’Grady v IC, EA/2019/0318/P, when determining a complaint, the Commissioner makes a decision based on the “balance of probabilities” - that is, more likely than not.
17. The Commissioner will consider the complainant’s evidence and arguments. He will also consider the actions taken by DESNZ to check that the information is not held and he will consider any other reasons offered by DESNZ to explain why the information is not held. The Commissioner will also consider any reason why it is inherently likely or unlikely that information is not held.
18. For clarity, if a public authority does not hold recorded information that falls within the scope of the request, the Commissioner cannot require the authority to take any further action.

The complainant's position

19. The complainant considers that DESNZ should hold information within the scope of the request arguing that: "I have seen multiple articles about 'Dimming the sun', I questioned what was being sprayed to achieve this and I got told there is no deliberate chemical spraying taking place, I do not agree with the response I got".

DESNZ's position

20. During the course of his investigation, the Commissioner asked DESNZ for an explanation of its search strategy and which business areas and individuals were consulted to identify information falling within the scope of the request ie requests for information about geo-engineering, solar geo-engineering trials, 'chemtrails', the ARIA Project, "dimming the sun", etc. He also asked other questions, as is his usual practice, relating to how DESNZ established whether or not it held information falling within the scope of the request.
21. DESNZ's position is that it does not hold information within the scope of the request. In its submissions to the Commissioner, DESNZ explained that:
- 'Chemtrails' is a term used by some people who claim that the white trails often seen behind high altitude aircraft on a clear day contain undisclosed chemical agents intended for a covert atmospheric spraying programme. This is a conspiracy theory: there is no evidence to support these claims which are resulting in the spreading of misinformation. The "chemtrails" conspiracy often claims that these trails are evidence of widespread, covert atmospheric spraying of dangerous chemicals for various malign purposes, including weather modification or population control. As explained to the complainant, this is a misconception; these white trails are in fact water vapour condensation trails;
  - DESNZ explained that no deliberate atmospheric spraying of chemicals for the purpose of geo-engineering is taking place in the UK, nor has any such spraying taken place over the last 10 years;
  - DESNZ argued that the original request asked for specific information relating to "chemtrail" activity from the last 10 years and that the questions in the original request were worded in a way that assumed such 'chemtrail' activity was taking place;
  - DESNZ argued that it cannot hold information from the last 10 years that is related to an activity that is not currently happening and has

not happened in those last 10 years. Therefore, in line with its approach to these kinds of questions, DESNZ said it sought to correct and reassure the requester that no such activity is taking place;

- In the internal review request, DESNZ noted that the requester mentioned 'ARIA' for the first time and also referred to 'dimming the sun;'
- DESNZ advised that it therefore provided the following advice and assistance to the complainant about the ARIA programme in its review response - that ARIA is a recently established body, it provided the complainant with a link to ARIA's website and information about ARIA's Exploring Climate Cooling programme. DESNZ advised the complainant that ARIA will "conduct cautious, controlled research to gather critical missing scientific data to better understand the risks and impacts of potential climate cooling approaches, including SRM" and that this will involve "carefully controlled, small-scale outdoor experiments. These small-scale experiments will be subject to strict oversight and governance, tightly constrained in size, scale and duration, and will be subject to an environmental impact and legal assessment to be made publicly available before the experiment takes place."
- At the time of the original request (25 April 2025), DESNZ explained that ARIA had not undertaken any outdoor experiments and had not announced which projects it would fund. DESNZ explained to the requester that the programme referred to above is not designed to block out the sun, release any toxic materials, or fund deployment of SRM. DESNZ also explained that ARIA do not carry out any activity related to 'chemtrails', so DESNZ considered that it did not hold any information in scope of the request;
- In submissions to the Commissioner DESNZ advised that for more information on ARIA's planned experiments, the public can refer to the FAQs on ARIA's website<sup>7</sup>. In particular, DESNZ noted that the FAQs state that:
  - "While a number of ARIA's funded outdoor experiments will examine if clouds can be made slightly more reflective for short

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<sup>7</sup> <https://aria.org.uk/opportunity-spaces/future-proofing-our-climate-and-weather/exploring-climate-cooling/faqs/>

periods (a few hours), these experiments will be strictly confined in size and time, and should have no effect noticeable to the human eye.

- Two experiments (UK and Australia) will spray natural seawater into the sky to measure its effect on cloud reflectivity. Any cloud effect will be tiny, brief (dissipating within 24 hours), and should not be noticeable to the human eye. Another experiment will launch weather balloons (US and/or UK) with secured milligram amounts of natural mineral dusts into the stratosphere. All the materials will be returned to the ground for recovery and analysis by scientists. Crucially, no materials will be released."
- DESNZ's submissions outlined to the Commissioner that its climate science and SRM policy teams have handled a significant volume of correspondence relating to both "chemtrails" and SRM over the last 10 years;
- Information requests made to DESNZ relating to "chemtrails" are handled by the DESNZ climate science team. DESNZ explained that, as the "chemtrails" concept has no basis in any UK research programmes, or any scientifically researched atmospheric interventions, it does not conduct a search in these cases. DESNZ stated that "we cannot hold information on the details of an activity that is not taking place". As there is no basis for the "chemtrails" concept or evidence of activity, DESNZ argued they are confident that DESNZ holds no information in scope that would answer the questions in the requester's original request;
- Information requests made to DESNZ relating to ARIA and its Exploring Climate Cooling programme are handled by the climate science team and the SRM policy leads who have led engagement with ARIA on their work in this area. DESNZ SRM policy leads have regular engagement with ARIA and would be aware of any recent developments in ARIA's work. DESNZ argued that as ARIA is not carrying out any activity relating to "chemtrails", it considered, as set out above, that it did not hold any information in scope as it cannot hold information on an activity that is not taking place;
- DESNZ argued that if ARIA were undertaking any activity such as those outlined in "chemtrails" theory, and if the Government held information to this effect, it would be held by DESNZ's climate science team or SRM policy team listed above;

- DESNZ explained they have not consulted with any other government departments or external bodies on this specific request. As stated above, due to the expertise and day-to-day responsibilities of the DESNZ climate science and SRM policy teams, and its regular stakeholder engagement including with other government departments on SRM, if ARIA were undertaking any activity such as those outlined in "chemtrails" theory, and if the Government held information to this effect, it would be held by these teams.

#### The Commissioner's conclusion

22. The Commissioner has carefully reviewed the submissions of both parties and their arguments put forward.
23. The Commissioner can see from the above bullet points that DESNZ has stated that "chemtrails" are a false concept with no scientific basis and confirmed that its position is that no atmospheric spraying has taken place in the UK in the past 10 years. DESNZ's position is that the original request assumed such chemtrail activity was occurring, and DESNZ could not hold information on something that has not happened.
24. The Commissioner appreciates that the complainant has raised a specific ground of complaint, both as part of the internal review process and in submissions to support their complaint, which set out why, in their view, the DESNZ should hold information relevant to their request.
25. The Commissioner asked DESNZ during the course of his investigation if it had considered seeking to clarify the original request with the complainant as the Commissioner noted that the original request's wording stated "I would like to know about the Geo-Engineering that has been published recently, specifically about the 'Chemtrails'.". The Commissioner notes that the request for internal review provides context to, and clarification of, the request, ie the complainant's reference to "multiple articles about 'Dimming the sun'".
26. The Commissioner therefore queried with DESNZ whether it was possible that the original request had a wider interpretation as it referred to recently published articles about geo-engineering. The Commissioner is aware from his own research that at the time of the

request there were various articles in the news published about the ARIA project<sup>8</sup>.

27. DESNZ responded to the Commissioner that "the original request asks for information relating to "chemtrail" activity from the last 10 years. It made no mention of ARIA who are in addition not involved in this activity. This is a query that the climate science team has repeatedly answered over many years, and the "chemtrails" theory is widespread and often in the media, so the Department saw no reason to seek clarification."
28. DESNZ went on to explain that "For the internal review which mentioned ARIA, we provided the requester with a link to ARIA's website, which included a tab at the top of the page that links to FAQs, and text to highlight that ARIA are only carrying out small-scale experiments and looking into emerging climate cooling approaches, not conducting widespread chemical spraying in the UK. As the requester was originally interested in "chemtrails" and as outlined above, ARIA are not involved in this activity, we did not consider that the requester would wish to contact ARIA."
29. The Commissioner accepts DESNZ's position in the specific circumstances of this case. The Commissioner acknowledges that his own guidance<sup>9</sup> states that a public authority should respond to a request based on the objective wording of the request itself and that a public authority is not expected to search for the history and context behind a request. Here, the main body of the original request contained a clear list of detailed questions about chemtrails and a passing reference to geo-engineering articles. It was therefore reasonable, in the Commissioner's view, for DESNZ to respond to the objective meaning of the request, namely, to answer the chemtrail questions (by providing a not held response), and to not seek further clarification at that time about any other context behind the request.

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<sup>8</sup> <https://www.manchestereveningnews.co.uk/news/uk-news/experiments-dim-sun-given-green-31495956>;  
<https://www.theguardian.com/environment/2025/apr/22/uk-scientists-outdoor-geoengineering-experiments>

<sup>9</sup> <https://ico.org.uk/for-organisations/foi/freedom-of-information-and-environmental-information-regulations/interpreting-and-clarifying-requests/>

30. As set out above, the complainant subsequently provided further context to his request, and specifically referred to ARIA and to “dimming the sun”. The Commissioner observes that, on receipt of this further context, DESNZ duly provided the complainant with advice and assistance by providing information about ARIA, details of the relevant ARIA project that the complainant had likely enquired about, and a link to ARIA’s website. DESNZ explained to the complainant that it was ARIA, not DESNZ, that was going to conduct research to better understand the risks and impacts of potential climate cooling approaches, including SRM.
31. DESNZ therefore set out in the internal review general information about the small scale experiments that ARIA was going to conduct and provided a link to the relevant part of ARIA’s website that contained information about this. The Commissioner has considered this further below under ‘advice and assistance’.
32. Whilst the Commissioner recognises that the complainant does not consider that DESNZ has fulfilled the request, DESNZ has provided a clear explanation of why it does not hold recorded information falling within the scope of the original request. No evidence is available to the Commissioner which would indicate that DESNZ holds recorded information falling within the scope of the request.
33. Furthermore, the Commissioner is satisfied that DESNZ has set out persuasive arguments about why it (and ARIA) did not hold information about chemtrails. He accepts that DESNZ’s conclusion that it does not hold any information falling within the scope of the request is a reasonable one in the circumstances.
34. In conclusion, the Commissioner finds, on the balance of probabilities, the DESNZ does not hold any recorded information falling within the scope of the request. It ought therefore to have cited the exception provided by regulation 12(4)(a), although the Commissioner observes that this does not affect his substantive decision in this case.

### **Public interest test**

35. Regulation 12(4)(a) of the EIR is a qualified exception, and therefore requires a public authority to carry out a public interest test.
36. The Commissioner considers it evident that it cannot be in the public interest to require a public authority to disclose information that it does not hold. In any event, the Commissioner is mindful that the EIR does not require a public authority to create or generate recorded information in order to respond to a request. Accordingly, the Commissioner could

not require DESNZ to take remedial steps even if he were to uphold the complaint.

37. The Commissioner also finds that the presumption in favour of disclosure cannot affect matters, because there can only be a presumption in favour of disclosure of information that is capable of being disclosed.

## **Procedural matters**

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### **Regulation 9 – advice and assistance**

38. Regulation 9 of the EIR requires a public authority to provide those making, or wishing to make, an information request with reasonable advice and assistance.
39. In his internal review request, the complainant for the first time referred to “the ARIA project to ‘dim the sun’”, rather than a list of questions about chemtrails.
40. In its internal review response, as set out above, DESNZ therefore provided the complainant with detailed information about the new body called ARIA but confirmed that ARIA was not involved in chemtrail activity or deliberate chemical spraying in the UK. It also stated that ARIA’s Exploring Climate Cooling programme does not fund deployment of SRM, large or sustained field trials, or research to facilitate deployment of technologies to “dim the sun”. However, DESNZ did explain that ARIA was going to conduct research to better understand the risks and impacts of potential climate cooling approaches, including SRM. DESNZ set out in the internal review general information about the small scale experiments that ARIA was going to conduct and provided a link to the relevant part of ARIA’s website that contained information about this.
41. Further, in order to be of assistance to the complainant, DESNZ provided the complainant with links to potential sources of relevant information on ARIA’s website<sup>10</sup> which included a tab at the top of the page that links to

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<sup>10</sup> <https://aria.org.uk/opportunity-spaces/future-proofing-our-climate-and-weather/exploring-climate-cooling/>

wide ranging Frequently Asked Questions (FAQs) about the ARIA project.<sup>11</sup> These FAQs written by ARIA contain answers to questions such as “What experiments do you expect to take place in the UK” and “Are you funding activities to block the sun”, “Will any of the experiments release toxic materials into the atmosphere?”.

42. The Commissioner notes that the complainant disputed DESNZ’s assertion that there was no deliberate chemical spraying taking place. He also notes DESNZ’s description of experiments that would spray natural seawater into the sky, and that would launch weather balloons containing natural mineral dusts into the stratosphere. The Commissioner is of the opinion that DESNZ has provided this additional information in order to assist the complainant’s understanding of the wider projects. However, he also notes that relevant information would be held by ARIA rather than DESNZ.
43. On that basis, the Commissioner is satisfied that DESNZ provided reasonable and appropriate advice and assistance in the specific circumstances of this case. Therefore the Commissioner finds that DESNZ complied with its obligation under regulation 9 of the EIR.

### **Regulation 10 – transfer of requests**

44. Regulation 10 of the EIR applies when a public authority does not hold some or all of the requested information, but believes that another public authority does hold it. The public authority receiving the request is required to either transfer the request to the other public authority, or inform the requester of the name and address of that public authority.
45. Whilst regulation 10 allows public authorities to choose between transferring a request or providing contact details, the Commissioner’s guidance recommends providing contact details. This course of action is better in keeping with data protection legislation and gives the requester the opportunity to refine their request before submitting it to the appropriate public authority, should they wish to do so.
46. While DESNZ provided a general link to ARIA’s website to the complainant in the internal review response it did not directly advise the complainant

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<sup>11</sup> <https://aria.org.uk/opportunity-spaces/future-proofing-our-climate-and-weather/exploring-climate-cooling/faqs/>

how they might be contacted. The Commissioner notes that DESNZ said it did not consider that the complainant would wish to contact ARIA, although it did direct the complainant generally to ARIA's website.

47. However, the Commissioner considers that it was likely that the complainant would want to contact ARIA to request information from it about the small scale experiments that ARIA was going to conduct. The Commissioner therefore finds that DESNZ breached regulation 10 in failing to advise the complainant of ARIA's contact details.
48. As the Commissioner does not consider that the complainant would have difficulty locating the contact details for ARIA, given the link it provided to ARIA's website, he considers that it would be disproportionate to order DESNZ to take any remedial steps.

#### **Regulation 14 – refusal notices**

49. Regulation 14(3) states that the refusal notice must specify the reasons not to disclose the information requested including any exception relied on.
50. The Commissioner records that DESNZ failed to cite any EIR exceptions in its original refusal notice or in its internal review response. While it provided an explanation of DESNZ's reasons not to disclose the information requested, it should have specifically cited that it was relying on regulation 12(4)(a) of the EIR.

## Right of appeal

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51. Either party has the right to appeal against this decision notice to the First-tier Tribunal (Information Rights). Information about the appeals process may be obtained from:

First-tier Tribunal (Information Rights)  
GRC & GRP Tribunals,  
PO Box 9300,  
LEICESTER,  
LE1 8DJ

Tel: 0203 936 8963

Fax: 0870 739 5836

Email: [grc@justice.gov.uk](mailto:grc@justice.gov.uk)

Website: [www.justice.gov.uk/tribunals/general-regulatory-chamber](http://www.justice.gov.uk/tribunals/general-regulatory-chamber)

52. If you wish to appeal against a decision notice, you can obtain information on how to appeal along with the relevant forms from the Information Tribunal website.
53. Any Notice of Appeal should be served on the Tribunal within 28 (calendar) days of the date on which this decision notice is sent.

**Catherine Hey**  
**Senior Case Officer**  
**Information Commissioner's Office**  
**Wycliffe House**  
**Water Lane**  
**Wilmslow**  
**Cheshire**  
**SK9 5AF**