



Ministry  
of Defence



DE&S Policy Secretariat

DESSEC-PolSecLE-JSC-WPNS@mod.gov.uk

Defence Equipment & Support  
Maple 0a #2043  
MOD Abbey Wood  
Bristol BS34 8JH

Reference: FOI2024/06956

13 June 2024

Dear [REDACTED]

Thank you for your email of 30 April 2024, requesting the following information:

1. *Does the MOD procure or utilise any wound healing products that contain chitin or chitosan?*
2. *If so, please provide a list of such products including:*
  - a. *Type, name and brand of product*
  - b. *Supplier(s) of the product(s)*
  - c. *Quantity procured or utilised in the last year (if possible)*

I am treating your correspondence as a request for information under the Freedom of Information Act 2000 (FOI Act).

A search for the information has now been completed within the Ministry of Defence (MOD), and I can confirm that information in scope of your request is held. I can confirm that the MOD purchases one wound healing product that contains chitosan: Chitosan Laminated Haemostatic Gauze – Celox Rapid Z Fold. The supplier for this product is Medtrade Products Limited.

It has proved necessary to withhold some information in accordance with qualified exemptions of the FOI Act. Section 26 (Defence) provides an exemption for information if its disclosure would, or would be likely to, prejudice the capability, effectiveness or security of any relevant forces. Section 43 (Commercial Interests) concerns information which if disclosed would or would likely prejudice the commercial interests of any person (including defence contractors and the public authority holding it).

As the exemptions are qualified, it was necessary to undertake a Public Interest Test to determine whether the balance for withholding the information outweighs that for disclosure. General arguments in favour of release were that full disclosure would demonstrate the MOD's commitment to openness and transparency; and make the UK Government more accountable to the electorate. The FOI Act also contains a presumption for release. However, releasing information on the quantities of wound healing products purchased would allow for estimates to be made of operationally sensitive information such as predicted casualty rates, as well as estimates of unit purchase costs which are commercially sensitive. Disclosing commercially sensitive information such as unit purchase costs would have a chilling effect on the MOD's corporate commercial reputation with current and future suppliers. Companies could be deterred from bidding for contracts and sharing commercially sensitive information with the

MOD which they would not normally divulge to third parties if they are unsure about whether their information would be protected. This would have a direct impact on the ability of the MOD to obtain best value for money for the taxpayer when conducting competitions.

Given the arguments described above, on balance, it was determined that the information should be withheld under Section 26(1)(b) (Defence) and Section 43(2) (Commercial Interests). The level of prejudice against release of this exempted information has been set at "would be likely to".

Under Section 16 (Advice and Assistance) of the FOI Act I can advise you that the contract award notice for the contract with Medtrade Products Limited for the supply of Celox Rapid Z Fold can be viewed on the contractsfinder website at the following link:

<https://www.contractsfinder.service.gov.uk/notice/be97aaf7-0aca-4553-a0a4-869777f23a53?origin=SearchResults&p=1>

If you have any queries regarding the content of this letter, please contact this office in the first instance. If you wish to complain about the handling of your request, or the content of this response, you can request an independent internal review by contacting the Information Rights Compliance team, Ground Floor, MOD Main Building, Whitehall, SW1A 2HB (e-mail CIO-FOI-IR@mod.gov.uk). Please note that any request for an internal review should be made within 40 working days of the date of this response.

If you remain dissatisfied following an internal review, you may raise your complaint directly to the Information Commissioner under the provisions of Section 50 of the Freedom of Information Act. Please note that the Information Commissioner will not normally investigate your case until the MOD internal review process has been completed. The Information Commissioner can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Further details of the role and powers of the Information Commissioner can be found on the Commissioner's website at <https://ico.org.uk/>.

Yours sincerely,

DE&S Policy Secretariat