

EUROPEAN COMMISSION

DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

General Affairs and Resources **Legal Affairs**

Brussels
Barnaby PACE
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Subject: Your application for access to documents under Regulation (EC) No 1049/2001 – Ref. GESTDEM No 2022/4254

Dear Mr Pace,

I refer to your message dated 22 July 2022 in which you made a request for access to documents. Such request has been registered with the above-mentioned reference number.

You requested access to the following documents:

- All documents—including but not limited to correspondence, emails, minutes, notes (hand written or electronic), audio or video recordings, verbatim reports, operational conclusions, lines to take, briefings, and presentations—related to the meeting on July 13 between Arunas Ribokas and Equinor ASA.

I consider your request to cover documents held up to the date of our reply to your initial application. Therefore, the following document falls within the scope of your application:

- Document 1: "Short debrief from a 30 minutes (physical) meeting with Equinor", held 13/07, A. Ribokas, *Ares* (2022)565944

With regard to the document 1 listed above, a complete disclosure of the identified documents is prevented by the exception concerning the protection of privacy and the integrity of the individual outlined in Article 4(1)(b) of Regulation (EC) No 1049/2001, because it contains the following personal data:

- the names/initials and contact details of natural persons.

Article 9(1)(b) of the Data Protection Regulation does not allow the transmission of these personal data, except if you prove that it is necessary to have the data transmitted to you for a specific purpose in the public interest and where there is no reason to assume that the legitimate interests of the data subject might be prejudiced. In your request, you do not express any particular interest to have access to these personal data nor do you put forward any arguments to establish the necessity to have the data transmitted for a specific purpose in the public interest.

Consequently, I conclude that, pursuant to Article 4(1)(b) of Regulation (EC) No 1049/2001, access cannot be granted to the personal data contained in the requested document, as the need to obtain access thereto for a purpose in the public interest has not been substantiated and there is no reason to think that the legitimate interests of the individuals concerned would not be prejudiced by disclosure of the personal data concerned.

Therefore, a redacted version of the document can be disclosed and is attached to this reply.

This document was drawn up for internal use under the responsibility of the relevant service of the Commission. It solely reflects the author's interpretation of the interventions made and does not set out any official position of the third parties to which the document refers, which was not consulted on its content. It does not reflect the position of the Commission and cannot be quoted as such.

In case you would disagree with this position, you are entitled, in accordance with Article 7(2) of Regulation (EC) No 1049/2001, to submit a confirmatory application requesting the Commission to review this position.

Such a confirmatory application should be addressed within 15 working days upon receipt of this letter to the Secretariat-General of the Commission at the following address:

European Commission Secretariat-General Transparency, Document Management & Access to Documents (SG.C.1) BERL 7/076 B-1049 Bruxelles

or by email to: sg-acc-doc@ec.europa.eu

Yours sincerely,

Martina DOPPELHAMMER
Head of Unit
p.o.
Marie-Laure CASONI
Deputy Head of Unit

Enclosure:

- Document 1, redacted.