



EUROPEAN COMMISSION
 DIRECTORATE-GENERAL
 CLIMATE ACTION
 Directorate A – Strategy, Analysis and Planning
CLIMA.A.4 – Administration, Financial Affairs & Human Resources

Brussels
 CLIMA

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Advance copy by email:
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Subject: Your application for access to documents EASE 2023/3022

Dear Ms Jordan,

We refer to your requests for access to European Commission documents EASE 2023/3022 registered on 24 May 2023.

You request access to:

“All documentation (including but not limited to all email correspondence/attachments, messages/documents sent through whatsapp (or any other messaging service), attendance lists, agendas, background papers, transcripts, recordings and minutes/notes) relating to the meetings listed below:

7) *Dow Europe GmbH and Diederik Samsom, Stefanie Hiesinger on 27-09-2022*

Please note that due to the wide scope of your request, covering also areas falling under the responsibility of other Directorates-General, parts of your request have been attributed to other Directorates-General ⁽¹⁾ This reply relates only to the documents held by the Directorate-General for Climate Action. You will receive the replies from the other respective Directorates-General in due course.

Your application concerns the following documents:

Title	Registration	Reference
1. Meeting request with Dow_27.09.2022_Redacted	13/07/2023	Ares(2023)4876741
2. Meeting notes_ Dow Europe GmbH_27.09.2022_Redacted	13/07/2023	Ares(2023)4884541

⁽¹⁾ EASE 2023/3021 for the Secretariat-General of the Commission (SG)

With regard to all documents mentioned 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 they contain the following personal data:

- the names/initials and contact information of Commission staff members not pertaining to the senior management;
- the names/initials/handwritten signatures and contact details of other 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 documents, 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.

Please note that documents originating from third parties are disclosed to you based on Regulation (EC) No 1049/2001. However, this disclosure is without prejudice to the rules on intellectual property, which may limit your right to reproduce or exploit the released documents without the agreement of the originator, who may hold an intellectual property right on them. The European Commission does not assume any responsibility from their reuse.

Document 2 was drawn up for internal use under the responsibility of the relevant service of the Cabinet of EVP Timmermans. It solely reflects the service'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 to the Secretariat-General of the Commission within 15 working days upon receipt of this letter. You can submit it in one of the following ways:

by asking for a review via your portal ⁽²⁾ account (available only for initial requests submitted via the portal account),

or by mail:

⁽²⁾ <https://www.ec.europa.eu/transparency/documents-request>

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,

Rudy VAN HORENBEEK
Head of Unit