



EUROPEAN COMMISSION

DIRECTORATE-GENERAL FOR INTERNAL MARKET, INDUSTRY, ENTREPRENEURSHIP
AND SMES

Sustainable Industry and Mobility

Energy Intensive Industries and Raw Materials

Brussels
GROW.C.2/HMCV/srm

Matteo Civillini
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By registered letter with
acknowledgment of receipt by email
[ask+request-9009-
a93054cf@asktheeu.org](mailto:ask+request-9009-a93054cf@asktheeu.org)

Dear Mr Civillini,

Subject: Your application for access to documents – GESTDEM 2021/0581

We refer to your e-mail of 04 February 2021 in which you make a request for access to documents, registered on 05 February 2021 under the above-mentioned reference number.

You request access to All documents - including but not limited to policy papers, proposals, briefings, reports - which have been produced and/or issued by Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs and include any of the following words/phrases: “deep-sea mining”, “seabed mining”, “marine minerals”

Your application concerns the following documents:

1. Briefing letter on EIT Raw Materials (ERMA) Kick-off Meeting, 19 November 2020
2. Reply to an open letter to Friends of the Earth Europe organisation, 13 November 2020, Ares(2020)6691348

With regard to the document 2. listed above, a complete disclosure of the identified document 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 and contact details of other natural persons;
- handwritten signatures/abbreviated signatures 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 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.

You may reuse public documents, which have been produced by the European Commission or by public and private entities on its behalf based on the Commission Decision on the reuse of Commission documents. You may reuse the documents disclosed free of charge and for non-commercial and commercial purposes provided that the source is acknowledged and that you do not distort the original meaning or message of the documents. Please note that the Commission does not assume liability stemming from the reuse.

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
Unit C.1. 'Transparency, Document Management and Access to Documents'
BERL 7/076
B-1049 Brussels, or by email to: sg-acc-doc@ec.europa.eu

Yours faithfully,

(e-signed)
Peter Handley
Head of Unit