



EUROPEAN COMMISSION
SECRETARIAT-GENERAL

Directorate E - Single Market & Connectivity
The Director

Brussels
SG.E/JW

Ms Vicky Cann
Rue d'Edimbourg 26
1050 Brussels

Advance copy by email:
ask+request-7864-
ffbd7a4a@asktheeu.org

Subject: Your application for access to documents – GESTDEM 2020/2219

Dear Ms Cann,

We refer to your e-mail of 17 April 2020, in which you make a request for access to documents, registered on the same day under the abovementioned reference number.

In this e-mail, you requested access to ‘a list of all lobby meetings (including phone calls, conference calls, etc.)’ and ‘lobby emails or other correspondence’ by the Secretariat-General since 1 March 2020 in relation to ‘single-use plastics, including in the light of the developing coronavirus pandemic’ and to ‘include the names of the individuals and organisations participating; the date; and any minutes / notes produced’.

We have identified two documents as falling within the scope of your request. You will find these documents attached to this letter.

Please note that these documents are redacted, because they contain personal data¹. The disclosure of such personal data is prevented by Article 4(1)(b) of Regulation (EC) No 1049/2001². The Data Protection Regulation³ also prevents the transmission of personal data, except if you prove that it is necessary to have the data transmitted to you for a

¹ For instance names or initials and contact information of Commission staff members not pertaining to the senior management, names or initials and contact details of other natural persons, or handwritten signatures or abbreviated signatures of natural persons.

² Regulation (EC) No 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents.

³ Article 9(1)(b) of Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC, OJ L 295, 21.11.2018, p. 39.

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. As your request does not establish the necessity to have the data transmitted, I conclude that access cannot be granted to these personal data. In case you would disagree with this position, please note that you are entitled, in accordance with Article 7(2) of Regulation (EC) No 1049/2001, to submit a confirmatory application⁴ requesting the Commission to reconsider its position, within 15 working days upon receipt of this letter.

Yours sincerely,

e-signature
John WATSON

Enclosures:

Huhtamaki_Redacted.pdf
Huhtamaki reply_Redacted.pdf

⁴ Such a confirmatory application should be addressed 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