



EUROPEAN COMMISSION
DIRECTORATE-GENERAL
ENVIRONMENT
Circular Economy & Green Growth
Waste Management & Secondary Materials

Brussels
ENV.B.3/MP

Ms Kajsa Rosenblad
Only by e-mail: ask+request-8309-
4ba146df@asktheu.org

Subject: GESTDEM 2020/4253 - Plastics Industry Lobbying since 1st of May 2017

Dear Ms Kajsa Rosenblad,

We refer to your e-mail dated 06/07/2020 in which you make a request for access to documents, registered on 13/07/2020 under the above mentioned reference number

You request access to a list of all lobby meetings (including phone calls, conference calls etc) held by DG Environment since 1 May 2017 on single-use plastics as well as plastic packaging commitments. The list should include the names of the individuals and organisations participating; the date; and any minutes / notes produced.

I consider your request to cover documents held up to the date of your initial application, i.e. the 6th of July 2020. My services have identified documents in the scope of your application. Due to the volume of the request and as agreed by telephone the documents will be sent to you in different periods as we are still in the process of identifying documents that could be sent to you at a later stage. Please see the Annex with the first meetings identified.

With regard to the documents 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 personal data, in particular, 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.

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 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.

All the documents subject to your request 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.

In accordance with Article 7(2) of Regulation 1049/2001, you are entitled to make a confirmatory application requesting the Commission to review this position with regard to the refusal of disclosing personal data and the refusal of disclosing the two documents.

Such a confirmatory application should be addressed within 15 working days upon receipt of this letter to the Secretary-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 e-mail to: sg-acc-doc@ec.europa.eu

Yours faithfully,

Mattia PELLEGRINI
Head of Unit
(e-signed)