



EUROPEAN COMMISSION

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

**Ecosystems I: Chemicals, Food, Retail
REACH**

Brussels,
GROW/F1/KH/nt
grow.f.1(2021) 6995877

Ms Francesca Cicculi
ask+request-9859-07b9c47e@asktheeu.org

**Subject: Your application for access to documents
Ref GestDem No 2021/5104**

Dear Ms Cicculi,

We refer to your email of 17/08/2021 in which you make a request for access to documents, registered on 19/08/2021 under the above-mentioned reference number.

Your application was as follows:

“For the period between 1 January 2017 to date:

- a list of all lobby and industry meetings and/or calls held by the Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs, including any Cabinet Members and/or officials, during which “PFAS” and/or “C604” and/or “PFOA” and/or “GenX” were discussed. The list should include: date, individuals attending and organisational affiliation, as well as the issues discussed;*
- all minutes and other reports of these meetings and/or calls;*
- all documents prepared for the purpose of the meetings issued both in preparation and after the meetings took place.*
- all correspondence, including attachments (i.e. any emails, mail correspondence or telephone call notes) between the Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs, including any Cabinet Members and/or officials, and any lobby group and/or industry representative discussing “PFAS” and/or “C604” and/or “PFOA” and/or “GenX”.”*

Please note that this letter is the second and last part of our reply.

For this second reply, we have identified 13 documents falling in the scope of your request. Please see the details in the attached document register.

Please note that, since some of the documents listed in the attached document register also originate from a third party, the originators have been consulted.

Having examined the documents requested under the provisions of Regulation (EC) No 1049/2001 regarding public access to documents, we have come to the conclusion that documents 2, 3, 8, 9 and 10, listed in the attached document register, can be fully disclosed.

Please note that parts of the documents 1, 4, 5, 6, 7, 11, 12 and 13 contain personal data, which have been redacted.

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 it contains the following personal data: the names/initials and contact information of staff members not pertaining to the senior management.

Article 9(1)(b) of the Data Protection Regulation¹ 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 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

In accordance with Article 7(2) of Regulation (EC) No 1049/2001, you are entitled to make 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,

(e-sign)
Giuseppe Caslla
Head of Unit

Encl.: Document register
13 documents (partially) disclosed

¹ 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.