



EUROPEAN COMMISSION

DIRECTORATE-GENERAL FOR FINANCIAL STABILITY, FINANCIAL SERVICES AND
CAPITAL MARKETS UNION

The Director-General

Brussels

fisma.d.1(2022)6272283/CP

Mr Michael PETERS

c/o Finanzwende Motzstraße 32

10777 Berlin

GERMANY

By e-mail:

ask+request-9919-dba69cce@asktheeu.org

Subject: Your application for access to documents – GESTDEM 2022/3752

Dear Sir,

We refer to your e-mail dated 9 September 2021, in which you make a request for access to documents, registered on 30 June 2022 (following the request for postal address indication) under the above-mentioned reference number.

You request access to *“A list of all meetings and informal consultations and the respective content of those that have taken place between the unit D1 Banking Union Supervision and financial institutions including their lobby associations (such as Deutscher Bankenverband, Fédération bancaire française (FBF), etc.) between 8.09.2020 and today.”*

The following documents fall within the scope of your application:

- Meeting record FISMA/10268 of 30/09/2020, *“ASF - CRR quick fix & Basel III Implementation”* (hereafter ‘meeting 1’), which includes the following documents:
 - Meeting request of 06 July 2020, *“ASF - Proposition de rendez-vous”* (hereafter ‘document 1.1’);
 - Minutes of the meeting (hereafter ‘document 1.2’);
- Meeting record FISMA/10841 of 17/11/2020, *“EDFI - CRR3”* (hereafter ‘meeting 2’), which includes the following documents:
 - Meeting request of 21/10/2020, *“Follow-on Meeting request with EDFI members”* (hereafter ‘document 2.1’);
 - PROPARCO Presentation (hereafter ‘document 2.2’);
 - EDFI Presentation (hereafter ‘document 2.3’);
 - Minutes of the meeting (hereafter ‘document 2.4’);

- Meeting record FISMA/11220 of 04/03/2021, “*Meeting with the German Investment Funds Association on financial services topics*” (hereafter ‘meeting 3’), which includes the following documents:
 - Meeting request of 18/01/2021, “*Meeting request on financial services topics*” (hereafter ‘document 3.1’);
 - Minutes of the meeting (hereafter ‘document 3.2’);
- Meeting record FISMA/11407 of 16/03/2021, “*Meeting with WOCCU - EC priorities, upcoming revision on CRR and CRD*” (hereafter ‘meeting 4’), which includes the following documents:
 - Meeting request of 15/01/2021, “*Request for a virtual meeting with WOCCU, 16 – 17 March*” (hereafter ‘document 4.1’);
 - Minutes of the meeting (hereafter ‘document 4.2’);
- Meeting record FISMA/11652 of 20/04/2021, “*“Meeting of the Working Group Law and Regulation” organised by AECM*” (hereafter ‘meeting 5’), which includes the following documents:
 - Agenda of the event (hereafter ‘document 5’);
- Meeting record FISMA/11232 of 27/01/2021, “*ASF_Invitation au Conseil_ 27 Janvier 2021*” (hereafter ‘meeting 6’), which includes the following documents:
 - Agenda-invitation of the event (hereafter ‘document 6’);
- Meeting record FISMA/11836 of 07/05/2021, “*EFBS-Bausparkassen - bilateral follow-up on your EFBS intervention on Basel III (19 March 2021)*” (hereafter ‘meeting 7’), which includes the following documents:
 - Minutes of the meeting (hereafter ‘document 7’);
- Meeting record FISMA/11852 of 06/05/2021, “*Italian Banking Association (ABI) - Remarks on "Finalising Basel 3" - Request for a videocall*” (hereafter ‘meeting 8’), which includes the following documents:
 - Meeting request of 27/04/2021, “*Italian Banking Association (ABI) - Remarks on "Finalising Basel 3" - Request for a videocall*” (hereafter ‘document 8.1’);
 - Presentation “*Towards the CRR3: ABI remarks on the transposition in the EU of the BCBS package finalising Basel 3 and other relevant proposals*” (hereafter ‘document 8.2’);
 - Minutes of the meeting (hereafter ‘document 8.3’);
- Meeting record FISMA/11928 of 26/05/2021, “*Meeting with Gide Loyrette Nouel on Leverage Ratio*” (hereafter ‘meeting 9’), which includes the following documents:
 - Minutes of the meeting (hereafter ‘document 9’);

- Meeting record FISMA/11949 of 28/05/2021, “*Phone call with [ISDA] about innovative solutions to the clearing and settlement issues in Europe*” (hereafter ‘meeting 10’), which includes the following documents:
 - Minutes of the meeting (hereafter ‘document 10’);
- Meeting record FISMA/11951 of 28/05/2021, “*Meeting with BBVA, Santander, Raiffeisen, Millennium BCP and EBF*” (hereafter ‘meeting 11’), which includes the following documents:
 - Minutes of the meeting (hereafter ‘document 11’);
- Meeting record FISMA/11980 of 11/06/2021, “*Follow-up meeting with EAPB to the recent exchange with DG Mr. Berrigan - Discussion of Basel III related issues*” (hereafter ‘meeting 12’), which includes the following documents:
 - Meeting request of 31/05/2021, “*EAPB - Request for follow-up meeting to the recent exchange with DG Mr. Berrigan - Discussion of Basel III related issues*” (hereafter ‘document 12.1’).
 - Minutes of the meeting (hereafter ‘document 12.2’);
- Meeting record FISMA/11981 of 17/06/2021, “*Meeting with Banco Santander (...) - Follow-up on Basel III meeting*” (hereafter ‘meeting 13’), which includes the following documents:
 - Meeting request of 31/05/2021, “*Follow-up on Basel III meeting - meeting with Banco Santander*” (hereafter ‘document 13.1’);
 - Minutes of the meeting (hereafter ‘document 13.2’);
- Meeting record FISMA/12008 of 08/06/2021, “*Meeting with Fitch Ratings on Basel III*” (hereafter ‘meeting 14’), which includes the following documents:
 - Meeting request of 04/06/2021, “*Request for meeting on Basel III - Fitch Ratings*” (hereafter ‘document Y.1’);
 - Minutes of the meeting (hereafter ‘document 14.2’);
- Meeting record FISMA/12032 of 16/06/2021, “*Meeting with BNP Paribas Fortis: richiesta di incontro*” (hereafter ‘meeting 15’), which includes the following documents:
 - Minutes of the meeting (hereafter ‘document 15’);
- Meeting record FISMA/12035 of 15/06/2021, “*BPFI - Joint Trade Association meeting request on Basel III finalization*” (hereafter ‘meeting 16’), which includes the following documents:
 - Minutes of the meeting (hereafter ‘document 16’);
- Meeting record FISMA/12062 of 01/07/2021, “*CEPS Webinar : Basel III finalisation - The impact on EU banks and the real economy across scenarios*” (hereafter ‘meeting 17’), which includes the following documents:

- Meeting request of 16/06/2021, “*Invitation to speak - CEPS Webinar: Basel III finalisation - The impact on EU banks and the real economy across scenarios*” (hereafter ‘document 17.1’);
- Minutes of the meeting (hereafter ‘document 17.2’);
- Meeting record FISMA/12065 of 28/06/2021, “*Meeting with BAI on CRR review / Basel III implementation*” (hereafter ‘meeting 18’), which includes the following documents:
 - Minutes of the meeting (hereafter ‘document 18’);
- Meeting record FISMA/12079 of 23/06/2021, “*Meeting with [...] BBVA*” (hereafter ‘meeting 19’), which includes the following documents:
 - Minutes of the meeting (hereafter ‘document 19’);
- Meeting record FISMA/12086 of 01/07/2021, “*Follow-up on Basel III meeting with Santander*” (hereafter ‘meeting 20’), which includes the following documents:
 - Meeting request of 23/06/2021, “*RE: Follow-up on Basel III meeting*” (hereafter ‘document 20.1’);
 - Minutes of the meeting (hereafter ‘document 20.2’);
- Meeting record FISMA/12091 of 08/06/2021, “*Meeting with the Austrian Savings Banks*” (hereafter ‘meeting 21’), which includes the following documents:
 - Meeting request of 08/06/2021, “*Meeting with the Austrian Savings Banks*” (hereafter ‘document 21.1’);
 - Minutes of the meeting (hereafter ‘document 21.2’);
- Meeting record FISMA/12098 of 29/06/2021, “*Meeting with an ESBG delegation on the finalisation of Basel III*” (hereafter ‘meeting 22’), which includes the following documents:
 - Meeting request of 09/06/2021, “*Meeting with an ESBG delegation on the finalisation of Basel III*” (hereafter ‘document 22.1’);
 - Minutes of the meeting (hereafter ‘document 22.2’);
- Meeting record FISMA/12268 of 09/09/2021, “*Meeting with [...] Invest Europe on CRR review*” (hereafter ‘meeting 23’), which includes the following documents:
 - Meeting request of 17/08/2021, “*CRR review - Invest Europe - request for a meeting*” (hereafter ‘document 23.1’);
 - Minutes of the meeting (hereafter ‘document 23.2’);
- Meeting record FISMA/12308 of 08/09/2021, “*Virtual Meeting of the Working Group Financial Services*” (hereafter ‘meeting 24’), which includes the following documents:

- Meeting invitation (hereafter ‘document 24.1’) and Agenda of the event (hereafter ‘document 24.2’) are available online, free of charge at <https://www.kangaroogroup.de/working-groups/wg-financial-services/>;
- Minutes of the meeting (hereafter ‘document 24.3’).

Having examined the documents requested under the provisions of Regulation (EC) No 1049/2001 regarding public access to documents, I have come to the conclusion that documents may be partially disclosed. Some parts of the documents have been blanked out as their disclosure is prevented by the exception to the right of access laid down in Article 4(1)(b) of this Regulation (exception referring to privacy and the integrity of the individual, in particular in accordance with the Community legislation regarding the protection of personal data).

The redacted parts of the documents contain personal data of identified or identifiable individuals and the disclosure of these parts would undermine the protection of privacy and protection of personal data.

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 of 12 December 2011 on the reuse of Commission documents (2011/833/EU). 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.

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.

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 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 Brussels
 or by e-mail to: sg-acc-doc@ec.europa.eu

Yours faithfully,

(electronically signed)

John BERRIGAN