



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL  
ENVIRONMENT  
Directorate B – Circular Economy  
ENV.B.2 – Safe & Sustainable Chemicals

Mr. Olivier Petitjean  
2 impasse Delaunay  
F-75011 Paris  
France

*Sent by e-mail:*  
[ask+request-11752-72462b0a@asktheeu.org](mailto:ask+request-11752-72462b0a@asktheeu.org)

Dear Mr. Petitjean,

**Subject: Your application for access to documents – EASE 2022/4700**

We refer to your e-mail of 18 August 2022 in which you make a request for access to documents, registered under the above mentioned reference number, and to our holding reply Ares(2022)6240213. We would like to sincerely apologise for the delay in our reply.

You requested access to: “... *All documentation (including but not limited to all email correspondence, attendance lists, agendas, background papers, transcripts, recordings and minutes/notes) relating to the meetings listed below:*

1. *Between Elena Montani and Dow Europe, on 13th July, 2022*
2. *Between Carmen Preising and BDI on 6th July, 2022”.*

Your application concerns the following documents:

- Ares(2022)8282309 - Minutes meeting with DOW, 13 July 2022;
- Ares(2022)8282166 - Flash report meeting with BDI – Commissioner Sinkevičius, 6 July 2022.

With regard to the documents listed above, 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 the following personal data:

- the names of Commission staff members not pertaining to the Cabinets or to senior management;
- the names 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 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.

These documents were drawn up for internal use under the responsibility of the relevant officials. They solely reflect the authors' interpretation of the interventions made and do not set out any official position of the third parties to which the documents refer, which were not consulted on their contents. They do not reflect the position of the Commission and cannot be quoted as such.

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 to the Secretariat-General of the Commission within 15 working days upon receipt of this letter. You can submit it in one of the following ways:

**by asking for a review via your portal<sup>1</sup> account** (available only for initial requests submitted via the portal account),

**or by mail:**

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](mailto:sg-acc-doc@ec.europa.eu)

Yours faithfully,

(E-signed)  
Cristina de Avila  
Head of Unit

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<sup>1</sup> <https://www.ec.europa.eu/transparency/documents-request>