



**EUROPEAN COMMISSION**  
DIRECTORATE-GENERAL  
ENVIRONMENT  
Directorate B – Circular Economy  
**ENV.B.3. – From Waste to Resources**

Brussels  
ENV.B.3

Venetia Roxburgh  
1 Long Lane  
London  
**By email: ask+request-12091-  
09713e06@asktheeu.org**

**Subject: Your application for access to documents – GESTDEM 2022/6361**

Dear Ms Roxburgh,

We refer to your e-mail of 03 November 2022 in which you make a request for access to documents, registered on 09 November 2022 under the above-mentioned reference number.

In your application you request 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 meeting listed below:

- 1. Between Henkel and cabinet member of Commissioner V. Sinkevičius Rozalina Petrova on the 6th May 2020.***
- 2. Between Unilever and cabinet member of Commissioner V. Sinkevičius Elena Montani, and Rozalina Petrova on the 8th July 2022.***
- 3. Between Unilever and cabinet member of Commissioner V. Sinkevičius Camilla Bursi, and Rozalina Petrova on the 12th October 2020.***

We confirm that we have identified 9 documents falling within the scope of your request, as listed hereunder:

File name and registration number	Document title	Date (if available)	Author / Addresses
1 – Ares(2020)1160410	Email: Meeting invitation from Henkel - Innovations to realise a circular economy	21 February 2020	Henkel to Cabinet Sinkevicius
2 – Ares(2020)2130034	Email: Meeting invitation from Henkel - Innovations to realise a circular economy	20 April 2020	Reply from Cabinet Sinkevicius
3 – Ares(2020)2617704 -	Email: Position paper of Henkel	11 May 2020	Henkel to Cabinet Sinkevicius and ENV B3
4 – Ares(2020) 3111103	Unilever's new Climate & Nature commitments	15 June 2020	Unilever to Cabinet Sinkevicius

5 – Ares(2020)4676127	Unilever to replace carbon derived from fossil fuels in Home care formulations with renewable or recycled carbon	8 September 2020	Unilever to Cabinet Sinkevicius
6 – Ares(2020)5018649	REPLY : Unilever to replace carbon derived from fossil fuels in Home care formulations with renewable or recycled carbon	24 September 2020	Cabinet Sinkevicius to Unilever
7 – Ares(2020)6026810	Thank you meeting Unilever	27 October 2020	Unilever to Cabinet Sinkevicius
8 – Ares(2022)3240507	Email: Unilever update and meeting request	24 April 2022	Reply from Cabinet Sinkevicius to Unilever
9– Ares(2023)1019976	Meeting note Unilever	08 July 2022	Cabinet Sinkevicius

With regard to the 9 documents listed above, specifically correspondence, 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/initials and contact information of Commission staff members not pertaining to the senior management;
- the names/initials and contact details of other natural persons;
- handwritten signatures/abbreviated signatures of natural persons.

In your application, you indicate that your address is in the UK. Transfers of personal data from the Commission to countries that are not members of the European Economic Area (EEA), or to international organisations are regulated under Chapter V of the Data Protection Regulation <sup>(1)</sup>.

According to Article 47(1) of this Regulation, a transfer of personal data to a third country or an international organisation may take place where the Commission has decided that the third country, a territory or one or more specified sectors within that country, or the international organisation in question ensures an adequate level of protection and where the personal data are transferred solely to allow tasks within the competence of the controller to be carried out. Based on the information available, the country of your residence is recognised by the Commission as ensuring an adequate level of protection.

However, we would further like to inform you that 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 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.

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<sup>(1)</sup> 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.

Please note that all 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.

Meeting reports were drawn up for internal use under the responsibility of the relevant officials of the Directorate-General for Environment or of Cabinet Sinkevicius. They solely reflect the author's interpretation of the interventions made and does not set out any official position of the third parties to which the document refers, which was not consulted on its content. It does 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 within 15 working days upon receipt of this letter to the Secretariat-General of the Commission at the following address:

**by asking for a review via your portal <sup>(2)</sup> account** (available only for initial requests submitted via the portal account),

**or by mail:**

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

Yours sincerely,

(e-signed)

Mattia PELLEGRINI  
Head of Unit

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<sup>(2)</sup> <https://www.ec.europa.eu/transparency/documents-request>