Subject: Your application for access to documents EASE (2023)1127

Dear Mr Dohle,

Reference is made to your request of access to documents registered under EASE (2023)1127.

Under the right of access to documents in the EU Treaties, as developed in Regulation 1049/2001, you are requesting documents which contain the following information: all correspondence received related to the subject of adoptions from Romania received by the European Commission in the period 2020 - now. Including pdf printouts of the ARES registration and circulation sheets.

As your request was registered on 20/2/2023, the period considered is 01/01/2020-20/2/2023.

The following documents fall within the scope of your application:

- Lettre ouverte à Madame la Présidente de la Commission Européenne, 1.3. 2021, Ares(2021)1558651. (hereafter «document 1»),


- Cri d’alarme sur le trafic d’enfants et la corruption dans l’adoption internationale, 8.2.2023, Ares(2023)925588 (hereafter «document 4»),
With regard to the documents No 1, 2, 3, 4, 5, 6, 7, 8, 9 and 10 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/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 signature of 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.

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 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 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 sincerely,

(e-signed)  
Andreas STEIN  
Head of Unit

Annexes: 10