



EUROPEAN COMMISSION  
NEIGHBOURHOOD AND ENLARGEMENT NEGOTIATIONS

R - Resources  
R.2 - Legal Issues

Brussels

Mr Arun DOHLE  
The Netherlands

By email only:  
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**Subject:** Your application for access to documents

**Ref.:** EASE 2023/1130

Dear Mr Dohle,

I refer to your application for access to documents registered under the above-mentioned reference number <sup>(1)</sup>. Your requested access to:

*“Agenda and minutes of the EU - CROATIA STABILISATION AND ASSOCIATION AGREEMENT, 1st meeting of the Sub-committee on Justice, Freedom and Security.”*

I also refer to our emails of 17 March 2023 <sup>(2)</sup> and 3 April 2023 <sup>(3)</sup> in which we explained that an extended time limit is needed for the purpose of searching in the historical archives, as well as to our email from 8 June 2023 <sup>(4)</sup> in which we explained you the need to consult notably with the Croatian authorities.

Your application concerns the below document:

- Agreed minutes of the EU-Croatia Subcommittee on Justice and Home Affairs, Brussels, 30 June 2005. Reference: 15127/06, Working Party on Enlargement and Countries Negotiating Accession to the EU.

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<sup>(1)</sup> Ref. Ares(2023)1209503.

<sup>(2)</sup> Ref. Ares(2023)1948995.

<sup>(3)</sup> Ref. Ares(2023)2398841.

<sup>(4)</sup> Ref. Ares(2023)4372770.

A full disclosure of this 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 <sup>(5)</sup>, because it contains the following personal data:

- the names of Commission staff members not pertaining to the 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 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 their personal data.

For reasons of good order, I further refer to Article 7(2) of Regulation (EC) No 1049/2001. Pursuant to this Article, you are entitled to make a confirmatory application requesting the Commission to review its 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 Bruxelles/Brussel

or by email to: [sg-acc-doc@ec.europa.eu](mailto:sg-acc-doc@ec.europa.eu)

[e-signed]

Christos KOMNINOS  
Head of Unit

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<sup>(5)</sup> Regulation (EC) No 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents, Official Journal L 145 of 31 May 2001, p. 43.