



**Council of the European Union**  
General Secretariat

Directorate-General Communication and Information - COMM  
Directorate Information and Outreach  
Information Services Unit / Transparency  
*Head of Unit*

Brussels, 12 June 2023

Mr Andrew Rettman  
Email: ask+request-12896-055d518f@asktheeu.org

Ref. 23/1210-vl/vk

Request made on: 23.04.2023  
Registered on: 24.04.2023  
Deadline extension: 17.05.2023

Dear Mr Rettman,

Thank you for your request for access to documents of the Council of the European Union..<sup>1</sup>

Your request focusing on “*documents which contain correspondence about EU sanctions on Russia imposed since 24 February 2022 from EU law firms representing Russian clients in ECJ cases; specifically, information on any correspondence or meetings*” and referring to a wide list of “*law firms and/or their individual lawyers*” is formulated in too general terms. Hence, given our limited staff resources, it would be quite laborious to identify the number of documents concerned while examining at the same time hundreds of requests from other citizens for public access to documents produced or held by our institution and related to the different EU policies requested by the other citizens.

It ought to be noted that such documents are of a special sensitive nature since they consist of exchanges of correspondence concerning requests for the evidence packages leading to the sanctions to individuals or entities represented by those lawyers, that have therefore been carried out in the context of privileged (not public) access. Hence, since you are not a lawyer representing the citizens or entities concerned, we regret being unable to follow-up to your request.

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<sup>1</sup> The General Secretariat of the Council has examined your request on the basis of the applicable rules: Regulation (EC) No 1049/2001 of the European Parliament and of the Council regarding public access to European Parliament, Council and Commission documents (OJ L 145, 31.5.2001, p. 43) and the specific provisions concerning public access to Council documents set out in Annex II to the Council's Rules of Procedure (Council Decision No 2009/937/EU, OJ L 325, 11.12.2009, p. 35).

When such requests are introduced in the framework of public access governed by Regulation (EC) No 1049/2001, the release of these documents to the public is refused as it would cause prejudice to the protection of privacy and the integrity of the identified individuals<sup>2</sup> and undermine the protection of legal advice<sup>3</sup>. Moreover, a partial disclosure<sup>4</sup> cannot be granted, as their content is considered an inseparable whole.

For your further enquiries, you may wish to consult first the Council's website, which contains a wide range of information relating to the activities of the institution as well as links to many documents which may be of interest to you. The public register contains the references of most Council (and European Council) documents since 1999 (exceptions are possible for classified documents), of which around 75% are in the public domain and can therefore be downloaded. You can search for documents there using several parameters (for instance, the country of your interest, the key words "restrictive", "measures", "sanctions", etc.).

Please find here below the relevant hyperlinks:

<https://www.consilium.europa.eu/en/policies/sanctions/>

<https://www.sanctionsmap.eu/#/main>

<https://www.consilium.europa.eu/en/documents-publications/publicregister/public-register-search/>

Yours Sincerely,

Fernando FLORINDO

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<sup>2</sup> Article 4(1)(b) of Regulation (EC) No 1049/2001 and Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018.

<sup>3</sup> Article 4(2), second indent, of Regulation (EC) No 1049/2001.

<sup>4</sup> Article 4(6) of Regulation (EC) No 1049/2001).