Dear Mr Münstermann,

Subject: Your application for access to documents –EASE 2023/3671

We refer to your email of 28 June 2023 in which you make a request for access to documents, registered on the same date under the above-mentioned reference number. We also refer to our email of 19 July 2023 extending the time limit to respond to your requests according to Article 7(3) of Regulation (EC) No 1049/2001 (1).

1. Scope of your request

In your request, you ask, on the basis of Regulation (EC) No 1049/2001, access to:

   minutes/protocols of the meetings of the following Cabinet members of Commissioner Stella Kyriakides with the following organisations and/or self-employed individuals:

   a) Annukka Ojala
      with European farmers (COPA) European agri-cooperatives (COGECA) on 08/02/2023 in Brussels (subject: "Framework on Sustainable Food Systems (FSFS)")

   b) Giorgios Rossides, Roberto Reig Rodrigo
      with International Biocontrol Manufacturers' Association (IBMA) on 18/01/2023 in Brussels (subject: "VTC meeting on the proposal for a regulation on the sustainable use of plant-protection products (SUR)").

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2. Identification and assessment of the relevant document

We have identified 6 documents that fall within the scope of your request, namely:

- 3 documents (No. 1 to No 3) falling within point a) of your request;
- 3 documents (No 4 to No 6) that fall within point b) of your request.

You will find attached a table listing the identified documents and summarising the outcome of the assessment carried out on the basis of Regulation (EC) No 1049/2001.

Having examined all the documents under the provisions of Regulation (EC) No 1049/2001, we have come to the conclusion, further explained below, that

- full access can be given to document No 2;
- partial access can be granted to the documents No 1, 3, 4, 5 and 6, their full disclosure being prevented by the exceptions to the right of access laid down in Article 4 of Regulation (EC) No 1049/2001.


You may reuse public documents, which have been produced by the European Commission or by public and private entities on its behalf based on the Commission Decision on the reuse of Commission documents. You may reuse the documents disclosed free of charge and for non-commercial and commercial purposes provided that the source is acknowledged and that you do not distort the original meaning or message of the documents. Please note that the Commission does not assume liability stemming from the reuse.

Please note that a document originating from third parties is 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 document without the agreement of the originator, who may hold an intellectual property right on it. The European Commission does not assume any responsibility from its reuse.

3. Reasons for partial disclosure

*Protection of the privacy and integrity of the individual, in particular in accordance with Community legislation regarding the protection of personal data - Article 4(1)(b) of Regulation (EC) No 1049/2001*

A complete disclosure of the documents No 1, 3, 4, 5 and 6 listed in the attached table is prevented by the exception concerning the protection of privacy and the integrity of the individual as laid down in Article 4(1)(b) of the Regulation, 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;

Article 9(1)(b) of the Data Protection Regulation (2) 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

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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, we 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.

In accordance with the above mentioned, partial access is granted to the mentioned documents, expunged of personal data.

4. Means of redress

In accordance with Article 7(2) of Regulation (EC) No 1049/2001, you are entitled to make 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

5. Acknowledgment of receipt

According to the standard operational procedure, the reply is sent by e-mail only. We would therefore appreciate if you could explicitly confirm receipt of the e-mail within 5 working days by replying to sante-access-to-documents@ec.europa.eu.

Yours faithfully,

Carmen GARAU
Head of Unit

Enclosure: list of the documents and disclosed documents