To
Mr Antoine Hasday
by electronic mail

Subject: Your request for access to documents of 14 February 2024
EEAS reference: 2024/34

Dear Mr Hasday,

I would like to thank you for your request for access to documents, which the EEAS has examined in the framework of Regulation (EC) No 1049/2001.¹

Following your application, we have searched for the requested documents “All documentation (including but not limited to contracts, reports, email correspondence, attendance lists, agendas, background papers, transcripts, recordings and minutes/notes) relating to the work private contractor Inspiro (a subsidiary of Cronos) has conducted on behalf of the EEAS regarding the monitoring of Disinformation, Foreign Information Manipulation & Interference (FIMI), including the outsourcing of the EEAS’ yearly report on Foreign Information Manipulation and Interference (FIMI) Threats” in the EEAS filing systems and document management databases.

After this search, the EEAS has identified the following documents matching your application, as referenced hereafter:

- CS003 Monthly report_1 (document 1);
- CS003 Monthly report_2 (document 2);
- CS003 Monthly report_3 (document 3);
- CS003 Monthly report_4 (document 4);
- CS003 Monthly report_5 (document 5);
- CS003 Monthly report_6 (document 6);
- CS003 Monthly report_7 (document 7);

Documents 1 to 30 are monthly and quarterly reports for services delivered to the EEAS by the contractor, which include information on the priorities to be followed in the monitoring of Foreign Information Manipulation and Interference (hereafter “FIMI”) with a view of tackling the phenomenon outside the EU. Our examination concluded that the disclosure of these documents to the general public would undermine the public interest as regards public security, as per Article 4(1)(a), first indent, of the Regulation. The release of details concerning the EU capabilities and priorities of monitoring as well as in performing analysis in the context of fighting FIMI, would reveal the strengths and the weaknesses of the EEAS and, consequently, of the EU. This information would be exploited by adverse actors to counter the EU activities and would result in concrete risks of successful FIMI activities as well as cyber-attacks against the EU, thereby undermining the public security.

Documents 30 to 60 are emails containing alerts of potential FIMI activity as observed by various parties, which were shared with the contractor. Any release of the content as well as the title of these documents would undermine the public interest as regards public security and international relations, as per Article 4(1)(a), first and third indents, of the Regulation. In fact, the disclosure of information concerning the FIMI incidents and attempts detected by or flagged to the EU would reveal relevant strengths and weaknesses and bring benefits to the FIMI activities of adverse actors, thereby undermining the public security. Moreover, by disclosing information on non-EU countries observed and considered as potential victims or authors of relevant attacks, would also undermine the EU bilateral relations with those countries.

Document 61 contains information on the monitoring tools used by the EEAS in the context of the fight against FIMI, as well as general instructions to perform relevant monitoring
activities. Its release to the general public would therefore undermine the public interest as regards public security as per Article 4(1)(a), first indent, of the Regulation. In fact, the document would reveal to adverse actors information that could be used to counter the EU activities on FIMI and to attempt relevant malicious FIMI activities targeting the EU activities and policies.

We have considered whether partial access could be granted to the listed documents. However, since the substantive parts of documents 1 to 61 are covered by the invoked exceptions, the release of the marginal and accessory information in the documents not covered by the exceptions would deprive them from any useful effect.

Therefore, I regret to inform you that we are not in a position to disclose these documents at this point in time, neither as a whole or partially, since it would undermine the protection of the public interest as regards public security and international relations, as per Article 4(1)(a), first and third indent of the Regulation.

I wish to conclude by clarifying that, contrary to what you have suggested in your application, the EEAS yearly report on foreign interference linked in your request was entirely drafted by the EEAS. The work performed by Inspiro in this regard was limited to supporting the graphic design and providing proof reading services.

Should you wish this position to be reviewed, you may make a confirmatory application within 15 working days in accordance with Article 7(2) of the Regulation.

Yours sincerely,

[e-signed]

Ludovic Promelle