Subject: Your application for access to documents – EASE 2024/0894

Dear Mr Hasday,

We refer to your e-mail of 15 February 2024 in which you make a request for access to documents, registered on the same date under the above-mentioned reference number.

We apologise for the delay in the handling of your request.

You request access to “All documentation (including but not limited to reports, email correspondence, attendance lists, agendas, background papers, transcripts, recordings and minutes/notes) relating to exchanges between DG JUST and Watch & Jewellery Initiative 2030 (https://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=31194252688-22).”

Your application concerns the following documents:

- Agenda - Watch & Jewellery Initiative 2030, 10 January 2023 event (email exchange + PowerPoint presentation), registered under Ares reference Ares(2022)8717137;

- Briefing CAB REYNDERS/1629 - Meeting with the Watch & Jewellery Initiative 2030, 10 January 2023, Ares(2024)2735500;

- Report - Bilateral meeting between Commissioner Reynders and the Watch & Jewellery, 10 January 2023, Ares(2023)245599;

- Watch & Jewellery Initiative 2030: Agenda for a meeting with Commissioner of Justice, 19 April 2023, Ares(2023)8111872;

- Briefing CAB REYNDERS_1733 - Watch & Jewellery Initiative 2030 – CEOs registered under Ares reference Ares(2023)8845564;
– Email exchange to organise a meeting on a preparation of pilot, Ares(2024)2298512; and

– Flash report on meeting with Watch & Jewellery initiative 2030 regarding pilot on CSDDD implementation, 1 February 2024, Ares(2024)777981.

With regard to all documents 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;

– other information relating to an identified or identifiable natural person (CVs, photographs).

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, 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.

Please note that documents with references Ares(2022)8717137, Ares(2023)8111872 and Ares(2024)2298512 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 it. The European Commission does not assume any responsibility from their reuse.

Documents with references Ares(2023)245599, Ares(2024)777981 were drawn up for internal use under the responsibility of the relevant service of the Directorate-General for Justice and Consumers. They solely reflect the service’s interpretation of the interventions made and do not set out any official position of the third parties to which the documents refer, which were not consulted on their content. They do not reflect the position of the Commission and cannot be quoted as such.

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 within 15 working days upon receipt of this letter to the Secretariat-General of the Commission at the following address:

European Commission  
Secretariat-General  
Unit C.1. ‘Transparency, Document Management and Access to Documents’  
BERL 7/076  
B-1049 Brussels, or by email to: sg-acc-doc@ec.europa.eu

Yours sincerely,

(e-signed)

Dan Dionisie  
Head of Unit