



EUROPEAN COMMISSION
 DIRECTORATE-GENERAL JUSTICE and CONSUMERS

The Director General

Brussels,
 JUST B3/BV/sk

Subject: Your application for access to documents – Ref GestDem No 2017/4203

Dear Honourable Member,

Thank you for your e-mail dated 14/07/2017 in which you make a request for access to documents, registered on 14/07/2017 under the above mentioned reference number. I regret that it has been necessary to extend the deadline to respond to your request, but this was due to the volume of documents requested.

Your application concerns the following documents:

#	Author	Addressee	Date	Title/subject	ARES reference
1	Redacted	Non-paper distributed at CWP 03/07/2013	03/07/2013	Gambling Sector: Money laundering risks	Ares(2017)4975759
2	Redacted	Room document distributed to Attaches	23/09/2013	Supra national Risk Assessment in the 4AMLD	Ares(2017)4975583
3	N.a.	Members of the Interinstitutional relations group (GRI)	08/11/2013	Proposal for a Directive of the European Parliament and of the Council on the prevention of the use of the financial system for the purpose of money laundering and terrorist financing.	To be covered by separate reply

MEP Mr Sven Giegold
ASP 05F163
Rue Wiertz 60
1047 Brussels

By registered letter with acknowledgment of receipt

Advance copy by email: ask+request-4485-c276e4e8@asktheeu.org

<i>#</i>	<i>Author</i>	<i>Addressee</i>	<i>Date</i>	<i>Title/subject</i>	<i>ARES reference</i>
4	N.a.	Members of the GRI	07/03/2014	As above	To be covered by separate reply
5	N.a.	Members of the GRI	26/05/2014	As above	To be covered by separate reply
6	N.a.	Members of the GRI	06/10/2014	As above	To be covered by separate reply
7	N.a.	Members of the GRI	08/12/2014	As above	To be covered by separate reply
8	N.a.	Members of the GRI	09/01/2015	As above	To be covered by separate reply
9	Not available	n/a For the file	24/04/2013	CWP minutes	Ares(2017)4971394
10	Not available	n/a For the file	31/05/2013	CWP minutes	Ares(2017)4971496
11	Not available	n/a For the file	14/06/2013	CWP minutes	Ares(2017)4971571
12	Not available	n/a For the file	03/07/2013	CWP minutes	Ares(2017)4972379
13	Not available	n/a For the file	18/07/2013	CWP minutes	Ares(2017)4973815
14	Not available	n/a For the file	19/07/2013	CWP minutes	Ares(2017)4973949
15	Not available	n/a For the file	05/09/2013	CWP minutes	Ares(2017)4972497
16	Not available	n/a For the file	01/10/2013	CWP minutes	Ares(2017)4972529
17	Redacted	Dejmek Hack (CAB-BARNIER); N. Calvino & H. Bassi (MARKT)	22/10/2013	CWP minutes	Ares(2017)4975035
18	Not available	n/a For the file	27/11/2013	CWP minutes	Ares(2017)4973702
19	Not available	n/a For the file	06/12/2013	CWP minutes	Ares(2017)4972747
20	Not available	n/a For the file	16/01/2014	CWP minutes	Ares(2017)4972800
21	Not available	n/a For the file	05/02/2014	CWP minutes	Ares(2017)4975332
22	Not available	n/a For the file	25/02/2014	CWP minutes	Ares(2017)4972899

I enclose a copy of the non-paper 'Gambling Sector: Money laundering risks' (document 1) and the non-paper on Supra national Risk Assessment in the 4AMLD (document 2) that were distributed at the Council Working party on 3 July 2013 and 23 September 2013 respectively.

Please note that because some of the documents you have requested fall under the responsibility of other Directorates-General, parts of your request (GRI notes) have been attributed to the Secretariat -General. This reply relates only to the documents held by DG Justice and Consumers. You will receive replies from the Commission's Secretariat-General in due course. (documents 3 – 8)

Having examined the other documents (documents 9 – 22) requested under the provisions of Regulation (EC) No 1049/2001 regarding public access to documents, I regret to inform you that your application cannot be granted, as disclosure is prevented by exceptions to the right of access laid down in Article 4(3) of this Regulation.

Disclosure of these documents would undermine the protection of the decision-making process and is likely to prejudice the ongoing negotiations relating to a proposal to amend Directive (EU) 2015/849. Disclosure is therefore prevented by exception to the right of access laid down in Article 4 (3) of Regulation (EC) No 1049/2001 as a large number of amendments are being discussed in the trilogue. Partial access to these documents, i.e. the remaining parts of these documents after expunging the confidential information, would make them meaningless or illegible.

The exceptions laid down in Articles 4(2) and 4(3) of Regulation 1049/2001 apply unless there is an overriding public interest in disclosure of the documents. An overriding public interest in disclosure, in accordance with the Regulation 1049/2001 has not been identified.

In accordance with Article 7(2) of Regulation 1049/2001, you are entitled to make 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 Secretary-General of the Commission at the following address:

European Commission
Secretary-General
Transparency unit SG-B-4
BERL 5/282
B-1049 Bruxelles

or by email to: sg-acc-doc@ec.europa.eu

Yours faithfully,

[e-signed]
Tiina Astola

Enclosures: 2