

## EUROPEAN COMMISSION

Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs

Consumer, Environmental and Health Technologies  
**REACH**

Brussels, **15 FEB. 2018**  
GROW/D1/GS/nt  
grow.ddg1.d.1(2018) 661835

Ms Vicky Cann  
Corporate Europe Observatory  
Rue d'Edimbourg, 26  
BE – 1050 Brussels  
Advance copy by email:  
ask+request-4903-  
1a8c8bfa@asktheeu.org

**Subject: Your applications for access to documents – Ref GestDem No 2018/152 and 155**

Dear Ms Cann,

We refer to your e-mails of 20 and 21/12/2017 in which you make requests for access to documents, registered in our services on 08/01/2018 under the above mentioned reference numbers.

Your applications concern the following documents:

- *a list of all lobby meetings held by DG GROW in 2017 where endocrine disrupting chemicals were discussed.*
- *the minutes/ reports of all lobby meetings held by DG GROW in 2017 where endocrine-disrupting chemicals were discussed with one or more of the following organisations: European Chemical Industry Council (Cefic), European Crop Protection Association (ECPA), PlasticsEurope, Cosmetics Europe, BASF, Bayer, European Centre for Ecotoxicology and Toxicology of Chemicals (ECETOC), Syngenta, EPPA SA, Croplife, Huggard Consulting, Weber Shandwick, Fleishman-Hillard, Burson-Marsteller, American Chamber of Commerce to the European Union (AmCham EU), US Mission to the EU, or any organisation or consultancy firm representing any of these actors.*

Having examined your requests under the provisions of Regulation (EC) No 1049/2001 regarding public access to documents, we have come to the conclusion that the requested documents may be partially disclosed. Some parts of the documents have been blanked out as these were outside the scope of your request or because their disclosure is prevented by exception to the right of access laid down in Article 4.1(b) of this Regulation.

The parts of the documents which contain personal data, in particular: names, functions and contact details of Commission staff and stakeholders' representatives, cannot be disclosed. This is pursuant to Article 4.1(b) of Regulation (EC) No 1049/2001, access to a document has to be refused if its disclosure would undermine the protection of privacy and the integrity of the individual, in particular in accordance with European Union

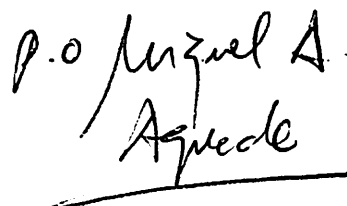
legislation regarding the protection of personal data. The applicable legislation in this field is Regulation (EC) No 45/2001 of the European Parliament and of the Council of 18 December 2000 on the protection of individuals with regard to the processing of personal data by the Community institutions and bodies and on the free movement of such data<sup>1</sup>. When access is requested to documents containing personal data, Regulation (EC) No 45/2001 becomes fully applicable<sup>2</sup>.

According to Article 8(b) of this Regulation, personal data shall only be transferred to recipients if they establish the necessity of having the data transferred to them and if there is no reason to assume that the legitimate rights of the persons concerned might be prejudiced. We consider that, with the information available, the necessity of disclosing the aforementioned personal data to you has not been established and/or that it cannot be assumed that such disclosure would not prejudice the legitimate rights of the persons concerned. Therefore, we are disclosing the documents requested with these personal data expunged.

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 of 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 5/327  
B-1049 Bruxelles  
or by email to: [sg-acc-doc@ec.europa.eu](mailto:sg-acc-doc@ec.europa.eu)

Yours sincerely,

A handwritten signature in black ink, appearing to read 'P.O. Michael A. Flüh', with a horizontal line drawn underneath.

Michael Flüh  
Head of Unit

Encl.: - Meetings list  
- 5 documents partially disclosed

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<sup>1</sup> OJ L 8 of 12.1.2001, p. 1

<sup>2</sup> Judgment of the Court of Justice of the EU of 29 June 2010 in case 28/08 P, Commission/The Bavarian Lager Co. Ltd, ECR 2010 I-06055.