



EUROPEAN COMMISSION
DIRECTORATE GENERAL
ECONOMIC AND FINANCIAL AFFAIRS

The Director-General

Brussels
ECFIN

Subject: Your application for access to documents – Ref GestDem No 2020/1293

Dear Mr Thomas Rowley,

We refer to your e-mail dated 30/01/2020 in which you made a request for access to documents, registered under the above-mentioned reference number.

You requested documents containing information related to Lydian International's Amulsar gold mine in Armenia held, created or received in 2018 and 2019.

After a search in DG ECFIN filing systems, document management databases and archives, DG ECFIN has identified the following documents:

1. CEE Bankwatch Network briefing on Amulsar gold mine, Armenia
2. Summary of events from EBRD's teams' perspective
3. Readout of the conference call with Bankwatch/Armenian Environmental Front on 17 October 2019.

Having examined the documents listed above under the provisions of Regulation (EC) No 1049/2001¹ regarding public access to documents, I am pleased to send you the document listed above under point 1 and partially disclosed documents 2 and 3 in attachment to this letter.

¹ Regulation (EC) No 1049/2001 of the European Parliament and of the Council regarding public access to European Parliament, Council and Commission documents (hereafter the "Regulation").

We consider that the partial disclosure of the documents 2 and 3 is justified under two clauses of Article 4 of Regulation (EC) No 1049/2001 related to exceptions for access to documents:

- Article 4(1)(a), 3rd indent, protection of the public interest as regards international relations.
- Article 4(1)(b) (protection of privacy and the integrity of the individual) (names of participants).

The document “Summary of events from EBRD’s teams’ perspective” is originated from a third party (the European Bank for Reconstruction and Development, “EBRD”) which has been consulted in accordance with Article 4 (4) of the Regulation 1049/2001.

The document “Readout of the conference call with Bankwatch/Armenian Environmental Front on 17 October 2019” is a note containing subjective assessments and opinions drawn up for internal use only.

Full disclosure of the documents would undermine our relations with several stakeholders and partners. Moreover, release of some elements might be negatively perceived and lead to detrimental consequences to EU's relations with our interlocutors representing a breach of trust amongst partners.

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

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

Yours sincerely,



Maarten Verwey