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EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR TRADE

The Director-General

Brussels
TRADE/SW/F4 (2021)1587281

By registered letter with acknowledgment of receipt

Mr Peter Teffer
Ekko Voorkamer
Bemuurde Weerd WZ 3
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The Netherlands

Advance copy by email:
ask+request-8948-41504613@asktheeu.org

Subject: Your application for access to documents - Ref GestDem 2021/0207

Dear Mr Teffer,

I refer to your application dated 13/01/2021, in which you make a request for access to documents under Regulation (EC) No 1049/2001[1] ('Regulation 1049/2001'), registered on 14/01/2021 under the above mentioned reference number.

1. SCOPE OF YOUR REQUEST

In your request, you asked for access to:

documents which contain the following information related to articles from Regulation (EU) 2019/452 of the European Parliament and of the Council of 19 March 2019 establishing a framework for the screening of foreign direct investments into the Union:

- (Article 5) All annual reports already submitted to the Commission on foreign direct investments and if applicable the application of their screening mechanisms

- (Article 6.1) All Member States' notifications of any foreign direct investment in their territory that has undergone screening

[1] Regulation (EC) No 1049/2001 of the European Parliament and of the Council of 20 May 2001 regarding public access to European Parliament, Council and Commission documents (OJ L 145, 31.5.2001, p. 43).

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- *(Article 6.2) All comments from one Member State to another about screenings*

- *(Article 6.3) All Commission opinions about screenings*

- *(Article 6.4) All Member State requests to the Commission or other Member States to provide comments/opinions*

- *(Article 6.6) All requests for information and replies*

- *(Article 6.8) All notifications of Member States of its intention to issue a screening decision before the timeframes referred to in paragraph 7; and justifications for immediate action*

- *(Article 7.1) All comments from Member States about a foreign direct investment planned or completed in another Member State which is not undergoing screening in that Member State*

- *(Article 7.2) All Commission opinions on foreign direct investments planned or completed in a Member State which is not undergoing screening in that Member State*

- *(Article 7.3) All Member States requests to issue an opinion on a foreign direct investment in its territory, and requests to other Member States to provide comments*

- *(Article 7.5) All requests for information and replies on a foreign direct investments not undergoing screening considered likely to affect security or public order*

- *(Article 8.1) All Commission opinions on a foreign direct investment considered likely to affect projects or programmes of Union interest on grounds of security or public order*

- *A list of the documents that fit the above descriptions with their metadata (i.e. author, date, subject)*

2. CONFIDENTIALITY IN THE EU FRAMEWORK FOR THE SCREENING OF FOREIGN DIRECT INVESTMENTS INTO THE UNION

Regulation (EU) 2019/452 establishing a framework for the screening of foreign direct investments into the Union ('FDI Screening Regulation') creates a system to cooperate and exchange information on investments by investors from non-EU countries that may affect security or public order. This Regulation also contains provisions as regards the treatment of information obtained or collected during the implementation of the Regulation, including the cooperation mechanism pursuant to Article 6 and Article 7.

Article 10 of the FDI Screening Regulation sets out the confidentiality obligations to be complied with by the Commission and the Member States for the implementation of the Regulation. It states that 'the information received as a result of the application of this Regulation shall be used only for the purpose for which it was requested.' Moreover, the confidential information exchanged during the process should be treated in accordance with respective Union and national law while classified information should not be declassified nor downgraded without prior written consent of the originator. *Classified information* means any information or material, in any form, the unauthorised disclosure of which could cause varying degrees of prejudice to the interests of the EU, or of one or more of the

Member States, and which bears one of [a set of] EU classification markings or a corresponding classification marking as set out in the Agreement between the Member States of the EU, meeting within the Council, regarding the protection of classified information exchanged in the interests of the EU[2]. Article 3(4) of the FDI Screening Regulation provides that confidential information, including commercially-sensitive information, made available to the Member State undertaking the screening shall be protected. In addition, Recital 30 states that any 'non-classified sensitive information or information which is provided on a confidential basis should be handled as such by the authorities'.

The above-mentioned confidentiality requirements are fundamental to ensure the efficiency of the created cooperation mechanism where Member States are obliged to share confidential information with each other and the Commission to protect security and public order in the EU while remaining among the world's most open investment areas.

To ensure the functioning of the EU framework on FDI Screening, a high level of confidentiality is essential as the disclosure of the mere fact of a foreign direct investment undergoing screening may affect the national security interest of the originating Member States and potentially the EU as a whole. Article 2(5) of the FDI Screening Regulation defines 'foreign direct investment undergoing screening' as a foreign direct investment undergoing a formal assessment or investigation pursuant to a screening mechanism. In some Member States, the decision to launch a "formal assessment or investigation" is taken after a preliminary assessment on grounds of security or public order, hence disclosing that a case is subject to the cooperation at EU level would reveal already a degree of sensitivity associated to the transaction by the notifying Member State. Since screening is conducted on grounds of security and public order, the fact that an investment into a certain target is undergoing screening should be protected on grounds of public security because it demonstrates that the target undertaking is considered critical for the security or public order of the Member State where the investment is planned or completed.

Revealing that an investment is being screened may also cause other damage, such as to the commercial interests of the target undertaking, the industrial and social relations of it, and within the target undertaking's personnel. Furthermore, the material assessment of individual FDI transactions is based on commercially sensitive information made available by the parties (foreign investor and/or the undertaking to which the capital is made available) to the Member State undertaking the screening on a confidential basis and with a legitimate expectation that the information will be protected not only by the recipient Member State but by other Member States and the Commission who receive this information pursuant to the cooperation mechanism. In addition, the information exchanged among Member States and the Commission is intrinsically very sensitive because the filter of the assessment of FDI transactions is one based exclusively on the security and public order in Member States and at EU level. The Member States' authorities and the Commission can only work effectively in these sensitive areas if there is full confidence that

[2] OJ C 202, 8.7.2011, p. 13–23, also referred in Recital (30) of the FDI Screening Regulation

not only the content of the information exchanged, but the existence of such exchanges in relation to specific FDI transactions remains confidential. The participants to the cooperation mechanism must not be operating with the uncertainty that their decision whether or not to notify an FDI transaction, ask questions, provide comments or issue an opinion might become public at a later stage. Allowing that uncertainty to exist will seriously undermine the effectiveness of the newly created cooperation mechanism. It is actually very likely that it would make it ineffective.

As regards your request for *All annual reports already submitted to the Commission on foreign direct investments and if applicable the application of their screening mechanisms,* I wish to note that, pursuant to Article 5(1) in conjunction with Article 17, Member States are to submit their first annual report to the Commission by 31 March 2021. There is not therefore at this moment any document falling under the scope of that part of your request. On the basis of the reports received from Member States, the Commission will prepare an annual report to provide some transparency regarding FDI screening activity in the EU. This is currently planned for after the summer this year.

3. THE ARTICULATION BETWEEN REGULATION 1049/2001 AND THE FDI SCREENING REGULATION

In its *TGI* and *Bavarian Lager* judgments[3], the Court has confirmed, on the one hand, that administrative activities are to be clearly distinguished from legislative procedures, for which the Court has acknowledged the existence of wider openness and, on the other hand, that the application of Regulation 1049/2001 cannot have the effect of rendering the provision of another Regulation over which it does not have primacy, ineffective.

Neither Regulation 1049/2001 nor the FDI Screening Regulation contain any provision expressly giving one Regulation primacy over the other. Therefore, it is appropriate to ensure that each of those Regulations is applied in a manner which is compatible with the other, and which enables a coherent application of both of them[4].

In this context, first of all it must be taken into account that the implementation of the FDI screening Regulation, notably the cooperation mechanism as regards the Commission's role in it, is part of the Commission's administrative functions, as opposed to the Commission's role in its legislative capacity.

Furthermore, the right to disclosure of documents under Regulation 1049/2001 shall not apply in contradiction with the above-mentioned guarantees offered by the FDI Screening Regulation nor the obligation of Member States undertaking a screening to protect confidential information, including commercially-sensitive and security and / or

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3 Judgment of the Court (Grand Chamber) of 29 June 2010 in case C-139/07 P, European Commission v Technische Glaswerke Ilmenau Gmbh, paragraphs 53-55 and 60; Judgment of the Court (Grand Chamber) of 29 June 2010, European Commission v the Bavarian Lager Co. Ltd., paragraphs 56-57 and 63.

4 See by analogy, judgment of the Court of justice of 28 June 2012 in Case C-404/10 P *Commission v. Editions Odile Jacob* SAS, EU:C:2012:393, paragraph 110.

public order sensitive information, made available to them. This would result in these guarantees being deprived of their meaningful effect. More particularly, this would undermine the effective application of the confidentiality requirements of the FDI screening Regulation set out in Articles 3 and 10, and Recital 30 and, ultimately, the effective protection of EU interest against a potential risk to security and public order which is the core objective of that Regulation.

Indeed, in T-128/14[5] Daimler vs Commission judgement, the Court indicates that *"in some cases the application of general presumptions is essentially dictated by the requirement to ensure the correct functioning of the procedures in question and to ensure that their objectives are not compromised. Thus, the recognition of a general presumption may be based on the incompatibility of access to the documents in certain procedures with the proper conduct of those procedures and on the risk that the procedures may be undermined, it being understood that the general presumptions enable the integrity of the conduct of the procedure to be preserved by restricting interference by third parties"*.

The same judgement also establishes that "*[i]n addition to the reasons based on the need to ensure a consistent application of Regulation No 1049/2001 and the framework directive* [understood in this case as the FDI Screening Regulation] *and also on the judgment of 29 June 2010, Commission v Technische Glaswerke Ilmenau (C-139/07 P, EU:C:2010:376), […] the Commission, in order to apply a general presumption of non-disclosure to the requested documents, relied, in essence, on the need to ensure an atmosphere of discretion and confidence with the Member States and to avoid interference by third parties in the ongoing investigation."*

In order to ensure the effectiveness of the FDI Screening Regulation, the general presumption established by the abovementioned case-law applies, by analogy, to the documents covered by the cooperation on individual FDI transactions pursuant to Article 6 and 7 of the Regulation.

Finally, as explained above, the character of information shared during the screening cooperation as well as the high level of confidentiality related to initiations and conduct of this process implies that not only the documents pertaining to the particular files but also the metadata (including information included in the titles of the aforementioned documents) should be protected. In the C266/05P *Sison vs. Council* case, the Court acknowledges that in certain cases disclosing even the very existence of a document can be protected by the exceptions of Regulation 1049/2001 stating that the authority "is thus entitled to require secrecy as regards even the existence of a sensitive document and also has the power to prevent disclosure of its own identity in the event that the existence of that document should become known". Following the above reasoning, it is impossible to provide a list of requested documents without undermining the confidentiality of the information exchange for the purpose of conducting the FDI screening procedure.

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[5] Judgement of the General Court (Fifth Chamber) of 4 October 2018 in case T-128/14 *Daimler AG v Commission*, paragraph 139 and 157

It is in the light of the abovementioned principles that the exceptions set out in Article 4(1)(a) first and third indent and 4(2) first indent of Regulation 1049/2001 shall apply to the requested documents, as it will be further explained below.

4. ASSESSMENT AND CONCLUSIONS UNDER REGULATION 1049/2001

4.1 Article 4(1)(a) first indent – protection of public interest as regards public security

Article 4 Paragraph 1(a) first indent of Regulation 1049/2001 provides that *"[t]he institutions shall refuse access to a document where disclosure would undermine the protection of: the public interest as regards: [...] public security"*.

Disclosure of the documents requested by you would undermine the protection of the public interest as regards public security, because the effectiveness of the protection of security or public order presupposes that information held by the public authorities relating to critical infrastructure, critical technologies and critical inputs, as well as undertakings with access to sensitive information, including personal data, or the ability to control such information[6] is kept secret and enables effective action to be taken. The same applies to information held by the public authorities on certain characteristics of the foreign investor[7] disclosed under the cooperation on individual FDI transactions. Finally, the same applies to the mere existence of certain documents revealing a decision to ask questions, submit information or comments.

4.2 Article (4.)1(a) third indent – protection of the public interest as regards international relations

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[6] C.f factors that may be taken into account pursuant to Article 4(1) of the FDI Screening Regulation, namely:
(a) critical infrastructure, whether physical or virtual, including energy, transport, water, health, communications, media, data processing or storage, aerospace, defence, electoral or financial infrastructure, and sensitive facilities, as well as land and real estate crucial for the use of such infrastructure;
(b) critical technologies and dual use items as defined in point 1 of Article 2 of Council Regulation (EC) No 428/2009 (15), including artificial intelligence, robotics, semiconductors, cybersecurity, aerospace, defence, energy storage, quantum and nuclear technologies as well as nanotechnologies and biotechnologies;
(c) supply of critical inputs, including energy or raw materials, as well as food security;
(d) access to sensitive information, including personal data, or the ability to control such information; or
(e) the freedom and pluralism of the media.

[7] C.f factors that may be taken into account pursuant to Article 4(2) of the FDI Screening Regulation, namely:
(a) whether the foreign investor is directly or indirectly controlled by the government, including state bodies or armed forces, of a third country, including through ownership structure or significant funding;
(b) whether the foreign investor has already been involved in activities affecting security or public order in a Member State; or
(c) whether there is a serious risk that the foreign investor engages in illegal or criminal activities.

4.3 Article 4(1)(a), third indent, of Regulation 1049/2001 provides that *'[t]he institutions shall refuse access to a document where disclosure would undermine the protection of: the public interest as regards: [...] international relations'*.

According to settled case-law, *'the particularly sensitive and essential nature of the interests protected by Article 4(1)(a) of Regulation 1049/2001, combined with the fact that access must be refused by the institution, under that provision, if disclosure of a document to the public would undermine those interests, confers on the decision which must thus be adopted by the institution a complex and delicate nature which calls for the exercise of particular care. Such a decision therefore requires a margin of appreciation'*[8]. In this context, the Court of Justice has acknowledged that the institutions enjoy *'a wide discretion for the purpose of determining whether the disclosure of documents relating to the fields covered by [the] exceptions [under Article 4(1)(a)] could undermine the public interest'*[9].

Disclosure of the documents requested by you would undermine the protection of the public interest as regards international relations, because the positions taken in relation to the foreign investors whose foreign direct investments are subject to the cooperation mechanism may impact our international relations with the governments or authorities of the country in which the investor is established, may impact the attractiveness of the EU and its Member States as a destination in which to invest or may trigger negative reactions from the State concerned. The FDI Screening Regulation applies to investments made by natural persons or undertakings from third countries, or 'foreign investors'.

The FDI Screening Regulation further states that the security and / or public order impact of a foreign direct investment may be examined in light of sensitive factors or threats relating to the foreign investor such as:

> *(a) whether the foreign investor is directly or indirectly controlled by the government, including state bodies or armed forces, of a third country, including through ownership structure or significant funding;*
> [...]

Revealing any information concerning the possible assessment of such security and / or public order risks concerning the target of the investment or concerning the threats relating to the foreign investors would undermine the relations with the countries concerned because the authorities of these countries may consider that their interests are adversely affected by the release of such information and may take measures in return that would adversely affect the relationship of the EU as a whole, or some or all of its Member States with these authorities.

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[8] Judgment in *Sison v Council,* C-266/05 P, EU:C:2007:75, paragraph 35.

[9] Judgment in *Council v Sophie in 't Veld,* C-350/12P, EU:C:2014:2039, paragraph 63.

Implying or confirming that the EU is aware of, or concerned about the foreign investor being directly or indirectly controlled by the government of a third country may undermine international relations with the government of that country, since it is likely to challenge this assessment. The EU holds regular consultations with third countries on issues of common interest, including regulatory issues in the area of trade and competition, which are the appropriate platform for discussions on these issues at policy or political level. Otherwise, the government of the third country may try to influence the specific case by case assessment by imposing retaliatory measures or threatening with such measures, which would undermine the conduct of the security and / or public order assessment and would adversely affect the relationship of the EU as a whole, or some or all of its Member States with these third countries.

For these reasons, the disclosure of a list of documents, as well as the documents themselves would reveal an assessment of the EU and its Member States in the specific context of FDI screening about risks that may be related, directly or indirectly, to the country of origin of the foreign investor. Giving access to those analyses would inevitably weaken the EU's position vis-à-vis these third countries, and, consequently, is liable to harm the interests of the European Union in the field of international relations.

4.4 Article 4(1)(b) privacy and the integrity of the individual

Article 4(1)(b) of Regulation 1049/2001 provides that *'[t]he institutions shall refuse access to a document where disclosure would undermine the protection of: [...]: (b) privacy and the integrity of the individual, in particular in accordance with Community legislation regarding the protection of personal data.'*

Article 14 of the FDI Screening Regulation sets out requirements for the processing of personal data and Recital (31) states that *'[a]ny processing of personal data pursuant to this Regulation should comply with the applicable rules on the protection of personal data.'*

Point 7 of the Privacy statement on protecting and processing personal data in the context of implementing the FDI Screening Regulation[10] provides that *'[a]ccess to personal data is provided to the Commission and the EEAS staff responsible for carrying out this processing and authorised staff in the Member States according to the "need to know" principle.'*

The FDI Screening Regulation states that the security and / or public order impact of a foreign direct investment may be examined in light of sensitive factors or threats relating to the foreign investor such as:

> *(b) whether the foreign investor has already been involved in activities affecting security or public order in a Member State; or*

[10] https://trade.ec.europa.eu/doclib/docs/2020/november/tradoc_159100.pdf

(c) whether there is a serious risk that the foreign investor engages in illegal or criminal activities.

In its judgment in the Bavarian Lager case, the Court of Justice ruled that when a request is made for access to documents containing personal data, Regulation (EC) No. 45/2001[4] becomes fully applicable[5]. This Regulation was repealed by Regulation (EU) 2018/1725[11] (hereafter 'Data Protection Regulation'). According to Article 3(1) of the 'Data Protection Regulation', *'personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, [...] or to one or more factors specific to the [...] economic, [...]identity of that natural person'.*

According to the Court of Justice, *'there is no reason of principle to justify excluding activities of a professional [...] nature from the notion of "private life"'*[12] . The names[13] of the persons concerned as well as other data from which their identity can be deduced, undoubtedly constitute personal data in the meaning of Article 3(1) of the Data Protection Regulation.

On the basis of the above, disclosure of the documents requested by you would constitute the processing of personal data, because the assessment takes into account in all FDI transactions information available about the foreign investor, including whether it has already been involved in activities affecting security or public order in a Member State and whether there is a serious risk that it engages in illegal or criminal activities. When the investor is a legal person, this analysis is conducted on the basis of information available about the natural persons directly or indirectly owning or controlling the legal persons involved in the transaction. The Commission takes the view that disclosing the name of the natural or legal persons subject to FDI screening would result in a breach of rules applicable to the processing of personal data, since public databases allow the identification of natural persons in the ownership chain.

According to Article 9 of the Data Protection Regulation,

"[...] personal data shall only be transmitted to recipients established in the Union other than Union institutions and bodies if:

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[11] Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC , *OJ L 295, 21.11.2018, p. 39–98*

[12] Judgment of 20 May 2003, Rechnungshof v Österreichischer Rundfunk and Others, C-465/00, C-138/01 and C-139/01, EU:C:2003:294, paragraph 73.

[13] Judgment of 29 June 2010, Commission v Bavarian Lager, C-28/08 P, EU:C:2010:378, paragraph 68.

(a) the recipient establishes that the data are necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the recipient; or

(b) the recipient establishes that it is necessary to have the data transmitted for a specific purpose in the public interest and the controller, where there is any reason to assume that the data subject's legitimate interests might be prejudiced, establishes that it is proportionate to transmit the personal data for that specific purpose after having demonstrably weighed the various competing interests."

In your request, you do not establish the necessity of having the data in question transferred to you. Therefore, the Commission had no grounds to assess whether the necessity to perform a task carried out in the public interest or the necessity to have the data transmitted for a specific purpose in the public interest outweigh the material or non-material damage to these natural persons such as discrimination, financial loss, damage to reputation, loss of confidentiality of personal data protected by professional secrecy and other significant economic disadvantage.

4.5 Article 4(2) first indent – protection of commercial interests

Article 4(2) first indent, of Regulation 1049/2001 provides that *'[t]he institutions shall refuse access to a document where disclosure would undermine the protection of: [...] commercial interests of a natural or legal person, including intellectual property [...] unless there is an overriding public interest in disclosure'.*

While not all information concerning a company and its business relations can be regarded as falling under the exception of Article 4(2) first indent, it appears that the type of information covered by the notion of commercial interests would generally be of the kind protected under the obligation of professional secrecy. Accordingly, it must be information that is 'known only to a limited number of persons', 'whose disclosure is liable to cause serious harm to the person who has provided it or to third parties' and for which 'the interests liable to be harmed by disclosure must, objectively, be worthy of protection'.

The requested documents refer to information provided by parties to an FDI transaction planned in the Member State where the target undertaking is domiciled. The information to be provided by the Member State is set out in Article 9. Specifically, the notification pursuant to Article 6 and replies to requests for information pursuant to Article 7(5) shall include:

(a) *the ownership structure of the foreign investor and of the undertaking in which the foreign direct investment is planned or has been completed, including information on the ultimate investor and participation in the capital;*

(b) the approximate value of the foreign direct investment;

(c) *the products, services and business operations of the foreign investor and of the undertaking in which the foreign direct investment is planned or has been completed;*

(d) *the Member States in which the foreign investor and the undertaking in which the foreign direct investment is planned or has been completed conduct relevant business operations;*

(e) *the funding of the investment and its source, on the basis of the best information available to the Member State;*

(f) *the date when the foreign direct investment is planned to be completed or has been completed.*

Article 9(3) requires the notifying Member State to endeavour to provide any information additional to the above, if available, to the requesting Member States and to the Commission without undue delay. Article 9(4) allows the notifying Member State to request such information from the foreign investor or the undertaking in which the foreign direct investment is planned or has been completed, who shall provide the information requested without undue delay.

In order to comply with these requirements, the foreign investor and the undertaking in which the foreign direct investment is planned or has been completed are obliged to disclose commercially sensitive information relating to the terms of the planned transaction, the pre- and post-transaction business strategy of the companies. This information is provided to the Member State against an obligation for the protection of confidential information, including commercially sensitive information.

Subsequent cooperation between the Member States themselves or the notifying Member State and the Commission, including comments by Member States or an opinion issued by the Commission are based on information disclosed in the notification pursuant to Article 6 or in the reply pursuant to Article 7(5) third subparagraph. Furthermore, these exchanges include sensitive information concerning the conditions that may be imposed for the approval of the transaction. These elements constitute business secrets, the disclosure of which could harm the parties' commercial interests even after the conclusion of the screening procedure and the completion of the transaction.

5. OVERRIDING PUBLIC INTEREST

The exceptions laid down in Article 4(2) first indent (protection of commercial interests) of Regulation 1049/2001 applies unless there is an overriding public interest in disclosure of the documents. Such an interest must, first, be public and, secondly, outweigh the harm caused by disclosure.

Accordingly, we have considered whether the risks attached to the release of the withheld parts of documents falling under the scope of your request are outweighed by the public interest in accessing the requested documents.

The public interest in this specific case rather lies on the protection of the legitimate confidentiality interests of the stakeholders concerned to ensure that Member States and the Commission continue to receive useful contributions for the assessment of FDI on grounds of security or public order without undermining the commercial position of the entities involved.

6. PARTIAL ACCESS

Pursuant to Article 4(6) of Regulation 1049/2001 '*[i]f only parts of the requested document are covered by any of the exceptions, the remaining parts of the document shall be released*'. Accordingly, we have also considered whether partial access can be granted to the individual submissions.

However, we consider that the requested documents are fully protected by a coherent application of Article 4(1)(a) first and third indent, Article 4(1)(b) and Article 4(2) first indent of Regulation 1049/2001, and that therefore access to the requested documents has to be refused.

7. MEANS OF REDRESS

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:

Secretary-General
European Commission
Transparency, Document Management & Access to Documents
BERL 7/76
Rue de la Loi 200/Wetstraat 200
1049 Brussels
Belgium

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

Yours faithfully,

Sabine WEYAND

Electronically signed on 02/03/2021 14:48 (UTC+01) in accordance with article 11 of Commission Decision C(2020) 4482