EUROPEAN COMMISSION

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Mr Jasper Roorda
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DECISION OF THE EUROPEAN COMMISSION PURSUANT TO ARTICLE 4 OF THE IMPLEMENTING RULES TO REGULATION (EC) NO 1049/2001[1]

Subject: Your confirmatory application for access to documents under Regulation (EC) No 1049/2001 - GESTDEM 2022/3271

Dear Mr Roorda,

I refer to your e-mail of 4 July 2022, registered on 5 July 2022, in which you submitted a confirmatory application in accordance with Article 7(2) of Regulation (EC) No 1049/2001 regarding public access to European Parliament, Council and Commission documents[2] (hereafter 'Regulation (EC) No 1049/2001').

1. SCOPE OF YOUR REQUEST

In your initial application of 3 June 2022[3], addressed to the Directorate-General for Budget (hereafter 'DG BUDG'), you requested access to the 'documents which contain the following information:

- all documents concerning the addition of IBF International Consulting to the Early Detection and Exclusion System [hereafter 'EDES'] database.
- all communication between the European Commission and IBF International Consulting related to the addition to the Early Detection and Exclusion System database.'

1 OJ L 345, 29.12.2001, p. 94.
2 OJ L 145, 31.5.2001, p. 43.
3 Ref. Ares(2022)4197184 – 07/06/2022.

You indicated that '[t]he public interest to know about IBF International Consulting's addition to the EDES database for "grave professional misconduct" is especially high'. Lastly, you mention that '[i]n light of the protection of the EU budget, there is a strong public interest to know how EU funding to a private firm that operates in geopolitically sensitive areas, is spent.'

In its reply of 28 June 2022[4], DG BUDG refused to grant access to the documents requested, considering that their disclosure is prevented by the exceptions to the right of access laid down in Article 4(1)(b) (protection of the privacy and integrity of the individual) and Article 4(2), first indent (protection of commercial interests) of Regulation (EC) No 1049/2001 and by Article 140 of Regulation 2018/1046[5] (hereinafter 'the Financial Regulation'). Moreover, DG BUDG essentially argued that 'there is no overriding public interest in disclosure as the public interest is better served by enabling the Commission and other authorised users to protect the Union's financial interests in full respect of the rights of the natural and legal persons concerned by your request.'

In the framework of your confirmatory application, you request a review of the initial reply of DG BUDG, contesting the latter's finding that the public interest does not override the need to protect the personal data and the commercial interests in this case. You recall the arguments presented in your initial application of 3 June 2022, i.e. the public interest to know about IBF International Consulting's addition to the EDES database for 'grave professional misconduct' and the 'public interest to know how EU funding to a private firm that operates in geopolitically sensitive areas, is spent'. While assuming that transparency of the EU budget is of the uttermost importance to the European Commission, you indicate that you do not understand how the public interest does not override the protection of personal data and commercial interests in this case. Furthermore, you point out that it is not clear how disclosing concrete information about the events that lead to IBF's addition to EDES could damage its commercial interests even more than the publication on EDES itself has already done.

2. ASSESSMENT AND CONCLUSIONS UNDER REGULATION (EC) NO 1049/2001

When assessing a confirmatory application for access to documents submitted pursuant to Regulation (EC) No 1049/2001, the Secretariat-General conducts a review of the reply given by the Directorate-General concerned at the initial stage.

In this context, first I would like to mention that 20 documents were found to fall under the scope of your request, all of which represent internal and external correspondence, meeting minutes and decisions that are part of an administrative file set up in implementation of Articles 135 and the following of the Financial Regulation. It is not possible to provide you with a detailed list of these documents because such disclosure,

4 Ref. Ares(2022)4729694 – 28/06/2022.

5 Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council of 18 July 2018 on the financial rules applicable to the general budget of the Union, amending Regulations (EU) No 1296/2013, (EU) No 1301/2013, (EU) No 1303/2013, (EU) No 1304/2013, (EU) No 1309/2013, (EU) No 1316/2013, (EU) No 223/2014, (EU) No 283/2014, and Decision No 541/2014/EU and repealing Regulation (EU, Euratom) No 966/2012, OJ L 193/30.07.2018, p.1.

which entails the release of information relating to the exclusion procedure as well as to the revision processes carried out, would affect the interests protected by the exceptions to public disclosure of documents under Article 4 of Regulation (EC) No 1049/2001 for the reasons further detailed below.

Following the above-mentioned examination, I regret to inform you that I must confirm the initial decision of DG BUDG to refuse access to the documents requested, based on the following exceptions laid down in Regulation (EC) No 1049/2001:

- Article 4(1)(b) (protection of privacy and the integrity of the individual),
- Article 4(2), first indent (protection of commercial interests of a natural or legal person) and
- Article 4(3), second subparagraph (protection of the closed decision-making process).

Detailed reasons are set out hereunder.

2.1. Protection of privacy and the integrity of the individual

Article 4(1)(b) of Regulation (EC) No 1049/2001 provides that '[t]he institutions shall refuse access to a document where disclosure would undermine the protection of […] privacy and the integrity of the individual, in particular in accordance with Community legislation regarding the protection of personal data'.

In its judgment in Case C-28/08 P (*Bavarian Lager*)[6], the Court of Justice ruled that when a request is made for access to documents containing personal data, 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[7] (hereafter 'Regulation (EC) No 45/2001') becomes fully applicable.

In the above-mentioned judgment, the Court stated that Article 4(1)(b) of Regulation (EC) No 1049/2001 'requires that any undermining of privacy and the integrity of the individual must always be examined and assessed in conformity with the legislation of the Union concerning the protection of personal data, and in particular with […] [the Data Protection] Regulation'[8].

Please note that, as from 11 December 2018, Regulation (EC) No 45/2001 has been repealed by 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

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6 Judgment of the Court of Justice of 29 June 2010, *European Commission* v *The Bavarian Lager Co. Ltd* (hereafter referred to as *'European Commission* v *The Bavarian Lager* judgment') C-28/08 P, EU:C:2010:378, paragraph 59.

7 OJ L 8, 12.1.2001, p. 1.

8 *European Commission* v *The Bavarian Lager* judgment, cited above, paragraph 59.

No 1247/2002/EC[9] (hereafter 'Regulation (EU) 2018/1725'). However, the case-law issued with regard to Regulation (EC) No 45/2001 remains relevant for the interpretation of Regulation (EU) 2018/1725.

Article 3(1) of Regulation (EU) 2018/1725 provides that personal data 'means any information relating to an identified or identifiable natural person […]'.

As the Court of Justice confirmed in Case C-465/00 (*Rechnungshof*), 'there is no reason of principle to justify excluding activities of a professional […] nature from the notion of private life'[10].

The documents requested contain personal data such as the names, surnames, functions, and professional activities of persons who are neither public figures, nor part of the senior management of the European Commission. The names[11] 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 Regulation (EU) 2018/1725.

Pursuant to Article 9(1)(b) of Regulation (EU) 2018/1725, 'personal data shall only be transmitted to recipients established in the Union other than Union institutions and bodies if '[t]he 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'.

Only if these conditions are fulfilled and the processing constitutes lawful processing in accordance with the requirements of Article 5 of Regulation (EU) 2018/1725, can the transmission of personal data occur.

In Case C-615/13 P (*ClientEarth*), the Court of Justice ruled that the institution does not have to examine by itself the existence of a need for transferring personal data[12]. This is also clear from Article 9(1)(b) of Regulation (EU) 2018/1725, which requires that the necessity to have the personal data transmitted must be established by the recipient.

According to Article 9(1)(b) of Regulation (EU) 2018/1725, the European Commission has to examine the further conditions for the lawful processing of personal data only if the first condition is fulfilled, namely if the recipient establishes that it is necessary to have the data transmitted for a specific purpose in the public interest. It is only in this case that the European Commission must examine whether there is a reason to assume that the data subject's legitimate interests might be prejudiced and, in the affirmative, establish the proportionality of the transmission of the personal data for that specific purpose after having demonstrably weighed the various competing interests.

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9 OJ L 295, 21.11.2018, p. 39.

10 Judgment of the Court of Justice of 20 May 2003, *Rechnungshof and Others* v *Österreichischer Rundfunk*, Joined Cases C-465/00, C-138/01 and C-139/01, EU:C:2003:294, paragraph 73.

11. *European Commission* v *The Bavarian Lager* judgment, cited above, paragraph 68.

12 Judgment of the Court of Justice of 16 July 2015, *ClientEarth* v *European Food Safety Agency*, C-615/13 P, EU:C:2015:489, paragraph 47.

In your confirmatory application, you put forward the need to ensure the transparency of the EU budget as argument to establish the necessity to have the data transmitted for a specific purpose in the public interest. However, there are reasons to assume that the legitimate interests of the data subjects concerned would be prejudiced by the disclosure of the personal data reflected in the documents, as there is a real and non-hypothetical risk that such public disclosure would harm their privacy and subject them to unsolicited external contacts. The processing of the personal data has therefore to remain limited to the purpose intended by Articles 135-145 of the Financial Regulation, i.e. to the protection of the Union's financial interests by means of detection of risks and imposition of administrative sanctions[13]. The requirement of transparency referred into your confirmatory application is effectively fulfilled in the context of the Financial Transparency System that contains information on recipients of funds financed by the budget[14]. The obligation of transparency can in fact be respected with less intrusive means for the individuals concerned and the necessity to have the personal data transmitted in the public interest for transparency purposes has not been established in this case.

Consequently, I conclude that, pursuant to Article 4(1)(b) of Regulation (EC) No 1049/2001, access cannot be granted to the personal data, as there is a real and non-hypothetical risk that the legitimate interests of the individuals concerned would be prejudiced by the disclosure of the personal data concerned.

2.2. Protection of commercial interests of a legal person

The first indent of Article 4(2) of Regulation (EC) No 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'.

Below you may find detailed explanations as to why the documents that you seek to obtain cannot be disclosed based on the protection of the above-referred interest.

Firstly, I note that Article 4(2), first indent of Regulation (EC) No 1049/2001 must be interpreted consistently with the provisions of the Financial Regulation on the access to information related to the exclusion. As neither Regulation (EC) No 1049/2001, nor the Financial Regulation contain any provision expressly giving one regulation primacy over the other, the right to disclosure of documents under Regulation (EC) No 1049/2001 cannot apply in contradiction with the specific confidentiality provisions laid down in the Financial Regulation, as this would result in these provisions being deprived of their meaningful effect.

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13 You may consult the Privacy statement for the EDES database at: https://ec.europa.eu/info/files/privacy-statement-edes-database_en

14 Article 38 of the Financial Regulation

Furthermore, the General Court in its *Cosepuri*[15] judgement confirmed that Regulation (EC) No 1049/2001 and the Financial Regulation[16] have different objectives and do not 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 their coherent application.

In this context, it has to be noted that Article 142(4) of the Financial Regulation specifically sets out who can be the recipient of the information contained in the EDES database: '[the Commission's] authorising officers and those of its executive agencies, all other Union institutions, Union bodies, European offices and agencies (…) in order to allow them to carry out the necessary verifications in respect of their ongoing award procedures and existing legal commitments'. The public disclosure of such data would go beyond what is necessary to achieve the purpose of the protection of the Union's financial interests. Effectively, the Financial Regulation does not allow disclosure to the public[17] of the information contained in the EDES database.

Secondly, Article 4(2), first indent of Regulation (EC) No 1049/2001 must be interpreted consistently with Article 339 of the Treaty on the Functioning of the European Union (hereafter 'TFEU'), which requires staff members of the EU institutions to refrain from disclosing information of the kind covered by the obligation of professional secrecy, in particular information about undertakings and their business relations. Applying Regulation (EC) No 1049/2001 cannot have the effect of rendering ineffective Article 339 TFEU, over which it does not have precedence.

As the Court of Justice explained, 'in order to apply the exception provided for by the first indent of Article 4(2) of Regulation No 1049/2001, it must be shown that the documents requested contain elements which may, if disclosed, seriously undermine the commercial interests of a legal person. That is the case, in particular, where the requested documents contain commercially sensitive information relating, in particular, to the business strategies of the undertakings concerned or to their commercial relations […]'[18]. Furthermore, the Court of Justice recognised that, '[i]n order that information be of the kind to fall within the ambit of the obligation of professional secrecy, it is necessary, first of all, that it be known only to a limited number of persons. It must then be information whose disclosure is liable to cause serious harm to the person who has provided it or to third parties. Finally, the interests liable to be harmed by disclosure must, objectively, be worthy of protection. The assessment as to the confidentiality of a piece of information thus requires the legitimate interests opposing disclosure of the information to be

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15 Judgment of the General Court of 29 January 2013, *Cosepuri Soc. Coop. pA v European Food Safety Agency (EFSA)*, T-339/10, EU:T:2013:38, paragraph 85.

16 Regulation (EU, Euratom) No. 966/2012 of the European Parliament and the Council of 25 October 2012 on the financial rules applicable to the general budget of the Union and repealing Council Regulation (EC, Euratom) No. 1605/2002, Official Journal L 298 of 26.10.2012, p.1, referred in this judgement, have been since then repealed and replaced by the Regulation referred in footnote 3 above. However, the case-law issued regarding Regulation (EU, Euratom) No. 966/2012 remains relevant for the interpretation of Regulation (EU, Euratom) 2018/1046.

17 With the exception of Article 140 of the Financial Regulation. See further pertinent indications under pages 8-9 below.

18 Judgment of the General Court of 5 February 2018, *PTC Therapeutics International* v *European Medicines Agency (EMA)*, T-718/15, EU:T:2018:66, paragraph 85.

weighed against the public interest that the activities of the Community institutions take place as openly as possible.'[19]

The documents requested contain sensitive information provided by the respondent concerning, among others, the business structure, governance, organisational and personnel measures within the undertaking subject of that case of exclusion. In view of the nature of these documents, which entail investigations on compliance with the exclusion situations provided in Article 136 of the Financial Regulation, their disclosure is liable to cause serious damage to the reputation of that undertaking and, therefore, to its commercial interests.

Furthermore, such release would result *de facto* in circumvention of the specific provisions referred to above, which apply to access to the information related to the exclusion system and would therefore undermine the commercial interests of the entities concerned by those provisions. Under the Financial Regulation, publication is considered to be an additional sanction that must be applied proportionately. In accordance with Article 140(1) of the Financial Regulation, the information that can be published on the Commission's website is strictly limited to (a) the name of the person or entity concerned, (b) the exclusion situation and (c) the duration of the exclusion and/or the amount of the financial penalty. Pursuant to Article 140(1), fourth subparagraph of the said regulation, '[t]he information published shall be removed as soon as possible after the exclusion comes to an end'. The removal of the exclusion from the Commission's internet site serves precisely the purpose of protecting the rights and freedoms of the person or entity at stake when the exclusion imposed to it has come to an end (or would otherwise expire, due to, inter alia, the revision of such an exclusion). Article 140(2) of the Financial Regulation forbids the publication of the information mentioned above 'where publication would cause disproportionate damage to the person or entity' subject to the exclusion.

Under these circumstances, it is obvious that releasing further information to the public, by disclosing documents from this file pursuant to an access to documents request submitted in accordance with the provisions of Regulation (EC) No 1049/2001, would not only run counter to the above-mentioned provisions of the Financial Regulation, but could also prove to be disproportionate to the objective pursued by the Early detection and exclusion system to protect the financial interests of the Union. As a result, contrary to your assertion in the confirmatory application that disclosing more detailed information about the firm's wrongdoings could not damage its commercial interest even more than the publication on EDES itself has already done, I take the view that in fact there is a real and non-hypothetical risk that disclosure of the documents requested would seriously harm the reputation of the undertaking concerned, which in turn would undermine its commercial interests.

Please note that the European Commission is largely relying on the cooperation of natural and legal persons in order to exert its investigative powers, linked in this case

[19] Judgment of the Court of First Instance of 30 May 2006, *Bank Austria Creditanstalt* v *Commission*, T-198/03, EU:T:2006:136, paragraph 71.

with the task to protect the financial interests of the Union. Careful respect by the European Commission of its obligations regarding professional secrecy provided in Article 339 TFEU has so far created a climate of mutual trust between the European Commission and entities, in which undertakings have cooperated by providing the European Commission with the information necessary for its investigations. The prospect of disclosing to the public information which would harm the legitimate commercial interests of the economic operators or might prejudice their position on the market runs the risk of adversely affecting the willingness of the undertakings to cooperate when such investigations are pending.

Against this background, I conclude that access to the documents must be denied also based on the exception laid down in the first indent of Article 4(2) of Regulation (EC) No 1049/2001. The public disclosure of such documents would undermine the system of procedural rules set up by the Financial Regulation, in particular of the provisions therein on access to information included in exclusion files.

2.3. Protection of the closed decision-making process

The second subparagraph of Article 4(3) of Regulation (EC) No 1049/2001 provides that '[a]ccess to a document containing opinions for internal use as part of deliberations and preliminary consultations within the institution concerned shall be refused even after the decision has been taken if disclosure of the document would seriously undermine the institution's decision-making process, unless there is an overriding public interest in disclosure.'

The documents requested contain assessments of various internal services involved in the exclusion procedure (e.g., decisions of the authorising officer responsible and recommendations of the panel referred to in Article 143 of the Financial Regulation), for which the decision-making process is already closed. It is essential that these deliberations and internal consultations are shielded from external pressure. In fact, the disclosure of these documents would expose the relevant European Commission departments to the foreseeable risk of coming under outside pressure from the persons external to the procedure, which would be detrimental to the proper conduct of the future assessments and undermine their effectiveness.

More concretely, I would like to recall that publication of the exclusion on the Commission's website is considered to be an additional sanction that must be applied proportionately. Article 140(1) of the Financial Regulation provides that '[i]n order to, where necessary, reinforce the deterrent effect of the exclusion and/or financial penalty, the Commission shall, subject to a decision of the authorising officer responsible, publish on its website the following information related to the exclusion (…)'. Undoubtedly, there is a real risk that public disclosure of the documents included in the exclusion files and the prospect of subsequent scrutiny from parties external to the assessment in a given case can influence future decisions whether to apply or not the sanction to publish the exclusion.

Under these circumstances, I believe that disclosure of the documents requested would seriously undermine the Commission's internal decision-making process protected by Article 4(3), second paragraph of Regulation 1049/2001, as it would harm the ability of the latter to protect the Union's financial interests without any undue external interference. Indeed, the fact that there is an interest from third parties in obtaining access to these documents through Regulation (EC) No 1049/2001 demonstrates that this risk is reasonably foreseeable and not purely hypothetical.

3. OVERRIDING PUBLIC INTEREST IN DISCLOSURE

Please note that Regulation (EC) No 1049/2001 does not include the possibility for the exceptions defined in Article 4(1) to be set aside by an overriding public interest.

However, the exceptions laid down in Article 4(2), first indent and in Article 4(3), second subparagraph of Regulation (EC) No 1049/2001 must be waived if there is an overriding public interest in disclosure. Such an interest must, firstly, be public and, secondly, outweigh the harm caused by disclosure.

According to the case-law, the applicant must, on the one hand, demonstrate the existence of a public interest likely to prevail over the reasons justifying the refusal of the documents concerned and, on the other hand, demonstrate precisely in what way disclosure of the documents would contribute to assuring protection of that public interest to the extent that the principle of transparency takes precedence over the protection of the interests which motivated the refusal[20].

In your confirmatory application, you point out that 'IBF is the development consulting firm that has received the most EU funding for the period 2014-2020' and mention the 'especially high' public interest to know about the addition of this entity to the EDES database for 'grave professional misconduct'. Furthermore, you assert that '[i]n light of the protection of the EU budget, there is a strong public interest to know how EU funding to a private firm that operates in geopolitically sensitive areas, is spent.' Ultimately, you refer to the 'transparency of the EU budget' as overriding public interest and mention that 'the public has not only the right to know how its tax money is spent, it has also the right to know what went wrong when its tax money was not spent correctly'.

However, please note that such general considerations cannot provide an appropriate basis for establishing that the principle of transparency was in this case especially pressing and capable, therefore, of prevailing character over the reasons justifying the refusal to disclose the documents in question[21]. The Court of First Instance held explicitly, in its *Turco v Council* judgment, that the overriding public interest capable of

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[20] Judgment of the General Court of 9 October 2018, *Anikó Pint* v *European Commission*, T-634/17, EU:T:2018:662, paragraph 48; Judgment of the General Court of 23 January 2017, *Association Justice & Environment, z.s* v *European Commission*, EU:T:2017:18, paragraph 53; Judgment of the General Court of 5 December 2018, *Falcon Technologies International LLC* v *European Commission*, T-875/16, EU:T:2018:877, paragraph 84.

[21] Judgment of the Court of Justice of 14 November 2013, *Liga para a Protecção da Natureza (LPN) and Republic of Finland* v *European Commission*, Joined Cases C-514/11 P and C-605/11 P, EU:C:2013:738, paragraph 93.

justifying the disclosure of a document covered by an exception must, as a rule, be distinct from the principles of transparency, openness and democracy[22]. The reason is that those principles are effectively implemented by the provisions of Regulation (EC) No 1049/2001 as a whole.

With regard to your assertion that there is a public interest to know about the wrongdoings committed by this entity which would have obtained the most EU funding in the period 2014-2020 and operates in geopolitically sensitive areas, please note that currently there is no registration of this entity in the EDES database. The company had taken appropriate measures to correct its professional conduct and prevent its further occurrence of such instances, in line with Articles 136(7) and 136(8) of the Financial Regulation. Therefore, the protection of the entity's commercial interests should prevail over the public interest that you invoke because the disclosure of the documents requested could undermine the reputation and credibility of the entity and could reinforce the punitive effect of the exclusion that effectively no longer exists. This protection is even more important given that the entity has undertaken measures to redress the damage caused and it undertook measures that restored its reliability.

Based on the above, I take the view that your arguments brought forward in your confirmatory application do not establish effectively and unequivocally the existence of an overriding public interest in the disclosure that would outweigh the interest of protecting the commercial interests of the entity concerned by the exclusion and the Commission's ability to act freely from external pressure. On the contrary, I consider that the public interest is better served by ensuring the confidentiality of the documents included in the exclusion file. The negative consequences of such disclosure would far outweigh the positive aspects that the disclosure of the documents requested could potentially bring to the public.

The fact that the documents requested relate to an administrative procedure and not to any legislative act, for which the Court of Justice has acknowledged the existence of wider openness[23], provides further support to this conclusion.

4. PARTIAL ACCESS

In accordance with Article 4(6) of Regulation (EC) No 1049/2001, I have considered the possibility of granting partial access to the documents requested. However, no partial access is possible without undermining the interests laid down in Article 4(1)(b) (protection of privacy and the integrity of the individual), in the first indent of Article 4(2) (protection of commercial interests) and in the second paragraph of Article 4(3) (protection of the closed decision-making process) of Regulation (EC) No 1049/2001.

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22 Judgment of the Court of First Instance of 23 November 2004, *Maurizio Turco* v *Council of the European Union*, T-84/03, EU:T:2004:339, paragraphs 81-83.

23 Judgment of the Court of Justice of 29 June 2010, *Commission v Technische Glaswerke Ilmenau Gmbh*, C-139/07 P, EU:C:2010:376, paragraphs 53-55 and 60; *Commission* v *Bavarian Lager* judgment, cited above, paragraphs 56-57 and 63.

5. MEANS OF REDRESS

Finally, I draw your attention to the means of redress available against this decision. You may either bring proceedings before the General Court or file a complaint with the European Ombudsman under the conditions specified respectively in Articles 263 and 228 of the Treaty on the Functioning of the European Union.

Yours sincerely,

For the Commission
Ilze JUHANSONE
Secretary-General

CERTIFIED COPY
For the Secretary-General

Martine DEPREZ
Director
Decision-making & Collegiality
EUROPEAN COMMISSION