



EUROPEAN COMMISSION
DIRECTORATE-GENERAL
ENVIRONMENT
Directorate B – Circular Economy
ENV.B.1 – Circular Economy, Sustainable Production & Consumption

Brussels
ENV.B.1/ env.b.1(2023)1604008

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Subject: Your application for access to documents EASE 2022/6363, 6364, 6365, 6366 and 6368

Dear Mrs Roxburgh,

We refer to your requests for access to European Commission documents registered on 9 November 2022 under the above-mentioned reference numbers.

You request access to documents concerning the following information:

All documentation (including but not limited to all email correspondence, attendance lists, agendas, background papers, transcripts, recordings and minutes/notes) relating to the meeting listed below:

EASE 2022/6363

1. Between H&M and Rozalina Petrova, cabinet member of Commissioner Virginijus Sinkevičius on the 4th June 2021.
2. Between H&M and Rozalina Petrova, cabinet member of Commissioner Virginijus Sinkevičius on the 20th February 2020
3. Between Eastman Chemical Company and Rozalina Petrova, cabinet member of Commissioner Virginijus Sinkevičius on the 3rd March 2022

EASE 2022/6364

1. Between Ingka Services and Commissioner Virginijus Sinkevičius on the 18th June 2021
2. Between Ingka Services and Commissioner Virginijus Sinkevičius on the 27th September 2022
3. Between Bundesverband der Deutschen Industrie e.V. and Commissioner Virginijus Sinkevičius on the 6th July 2022.

EASE 2022/6365

1. Between Global Fashion Agenda, EUROPEAN APPAREL AND TEXTILE CONFEDERATION, Ellen MacArthur Foundation and Commissioner Virginijus Sinkevičius on the 25th January 2022
2. Between EUROPEAN APPAREL AND TEXTILE CONFEDERATION and cabinet member of Commissioner Virginijus Sinkevičius, Marius Vaščega, on the 5th May 2020.
3. Between Amazon and cabinet member of Commissioner Virginijus Sinkevičius Marius Vaščega on the 20th October 2020

EASE 2022/6366

1. Between Hewlett Packard Enterprise and cabinet member of Commissioner Virginijus Sinkevičius Marius Vaščega on the 28th January 2020.
2. Between Microsoft Corporation and Commissioner Virginijus Sinkevičius on the 23rd September 2021.
3. Between European Chemical Industry Council and Commissioner Virginijus Sinkevičius on the 10th June 2020.

EASE 2022/6368

1. Between Danone and Commissioner Virginijus Sinkevičius on the 13th October 2020.
2. Between Eurometaux and Commissioner Virginijus Sinkevičius on the 16th July 2020
3. Between PepsiCo and cabinet member of Commissioner Virginijus Sinkevičius, Rozalina Petrova, on the 1st June 2021

Your application concerns 39 documents listed in the attached document register.

A complete disclosure of 32 of the identified documents is prevented by the exception concerning the protection of privacy and the integrity of the individual outlined in Article 4(1)(b) of Regulation (EC) No 1049/2001, because they contain the following personal data:

- the names/initials and contact information of Commission staff members not pertaining to the senior management;
- the names/initials and contact details of other natural persons;
- handwritten signatures/abbreviated signatures of natural persons;

In your application, you indicate that your address is in the UK. Transfers of personal data from the Commission to countries that are not members of the European Economic Area (EEA), or to international organisations are regulated under Chapter V of the Data Protection Regulation¹.

According to Article 47(1) of this Regulation, a transfer of personal data to a third country or an international organisation may take place where the Commission has decided that the third country, a territory or one or more specified sectors within that country, or the international organisation in question ensures an adequate level of protection and where the personal data are transferred solely to allow tasks within the competence of the controller to be carried out.

¹ 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.

Based on the information available, the country of your residence / your international organisation is recognised by the Commission as ensuring an adequate level of protection. However, we would further like to inform you that

Article 9(1)(b) of the Data Protection Regulation does not allow the transmission of these personal data, except if you prove that it is necessary to have the data transmitted to you for a specific purpose in the public interest and where there is no reason to assume that the legitimate interests of the data subject might be prejudiced. In your request, you do not express any particular interest to have access to these personal data nor do you put forward arguments to establish the necessity to have the data transmitted for a specific purpose in the public interest.

Consequently, I conclude that, pursuant to Article 4(1)(b) of Regulation (EC) No 1049/2001, access cannot be granted to the personal data contained in the requested documents, as the need to obtain access thereto for a purpose in the public interest has not been substantiated and there is no reason to think that the legitimate interests of the individuals concerned would not be prejudiced by disclosure of the personal data concerned.

Please note that documents originating from third parties are disclosed to you based on Regulation (EC) No 1049/2001. However, this disclosure is without prejudice to the rules on intellectual property, which may limit your right to reproduce or exploit the released documents without the agreement of the originator, who may hold an intellectual property right on them. The European Commission does not assume any responsibility from their reuse.

Meeting reports were drawn up for internal use under the responsibility of the relevant officials of the Directorate-General for Environment or of Cabinet Sinkevicius. They solely reflect the author's interpretation of the interventions made and does not set out any official position of the third parties to which the document refers, which was not consulted on its content. It does not reflect the position of the Commission and cannot be quoted as such.

In case you would disagree with this position, you are entitled, in accordance with Article 7(2) of Regulation (EC) No 1049/2001, to submit a confirmatory application requesting the Commission to review this position.

Such a confirmatory application should be addressed to the Secretariat-General of the Commission within 15 working days upon receipt of this letter. You can submit it in one of the following ways:

by asking for a review via your portal² account (available only for initial requests submitted via the portal account),

or by mail:

European Commission
Secretariat-General
Transparency, Document Management & Access to Documents (SG.C.1)
BERL 7/076
B-1049 Bruxelles

² <https://www.ec.europa.eu/transparency/documents-request>

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

Yours faithfully,

Emmanuelle MAIRE
Head of unit
e-signed