



EUROPEAN COMMISSION

DIRECTORATE-GENERAL FOR INTERNAL MARKET, INDUSTRY, ENTREPRENEURSHIP
AND SMES

The Director-General

Brussels
GROW.G.2/(2023)4470280

Ms Lora VERHEECKE
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Subject: Your application for access to documents – EASE 2023/1933

Dear Ms Verheecke,

We refer to your e-mail received on 28 March 2023 in which you make a request for access to documents addressed to the Directorate General for Internal Market, Industry, Entrepreneurship and SMEs (DG GROW), which was registered on 28 March 2023 under the above-mentioned reference number.

You request access to:

all the documents related to the meetings between DG Grow and:

- * *European Issuers association on 16/06/2021*
- * *Eurometaux on 2/09/2021*
- * *AmChamEU on 22/09/2021*
- * *Bureau Veritas - Suite RDV avec Mme la Députée Emilie CARIOU on 02/05/2022*
- * *Euromines 05/04/2022*
- * *ASD Europe (aerospace and defence industries association) 04/04/2022*

Following your request, we have identified the following documents falling in the scope of your request, and which are enclosed:

- 1) Document 1_European Issuers association_ Ares(2021)4501034;
- 2) Document 2_EUROMETAUX_ Ares(2021)5783743;
- 3) Document 3_AMCHAM_Ares(2021)6354167;
- 4) Document 4_Bureau Veritas_Ares(2021)3367826;
- 5) Document 5_Euromines_Ares(2023)2697107 (containing minutes and a list of participants);
- 6) Document 6_ASD Europe_ Ares(2022)2505034.

With regard to the listed above documents, a complete disclosure 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.

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 any 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.

Disclaimers:

Please note that position papers 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 position papers without the agreement of the originators, who may hold an intellectual property right on them. The European Commission does not assume any responsibility from their reuse.

The minutes were drawn up for internal use under the responsibility of the relevant services of the Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs (DG GROW). They solely reflect the services' interpretation of the interventions made and do not set out any official position of the third parties to which the documents refer. They do 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 portal¹ 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

¹ <https://www.ec.europa.eu/transparency/documents-request>

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

Yours faithfully,

Kerstin Jorna
Director-General

Enclosures: Document 1, Document 2, Document 3, Document 4, Document 5,
Document 6, List of identified documents - EASE 2023/1933