

EUROPEAN COMMISSION
Directorate-General for Trade

The Director General

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***By registered letter with acknowledgment
of receipt***

Mr Stefan Knoll
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Subject: Your application for access to documents – Ref GestDem No 2015/5124

Dear Mr Knoll,

I refer to your request for access to documents dated 29 September 2015, under Regulation (EC) No 1049/2001 ("Regulation 1049/2001"),¹ registered under the above mentioned reference number.

In your request you sought access to lists and reports of meetings with external stakeholders related to the Transatlantic Trade and Investment Partnership (TTIP) as well as correspondence between DG Trade and these stakeholders. We sent you a list of 640 meetings on 29 August 2016 together with a recap of already released documents. On 20 and 21 October 2016 we sent you additional batches of documents.

This reply concerns a further (but not final) batch of documents under your request 2015/5124, containing in total 24 documents, which are either meeting reports or follow up correspondence related to a meeting. You will find a list of these documents in Annex I. The released documents are enclosed. Please note that for one of the meetings listed in Annex I, there is no report.

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.

1. ASSESSMENT AND CONCLUSIONS UNDER REGULATION 1049/2001

In accordance with settled case law², when an institution is asked to disclose a document, it must assess, in each individual case, whether that document falls within the exceptions to the right of public access to documents set out in article 4 of Regulation 1049/2001. Such assessment is carried out in a multi-step approach: first, the institution must satisfy itself that the document relates to one of the exceptions, and if so, decide which parts of it are covered by that exception; second, it must examine whether disclosure of the parts of the document in question pose a “*reasonably foreseeable and not purely hypothetical*” risk of undermining the protection of the interest covered by the exception; third, if it takes the view that disclosure would undermine the protection of any of the interests defined under articles 4(2) and 4(3) of Regulation 1049/2001, the institution is required “*to ascertain whether there is any overriding public interest justifying disclosure*”³.

In view of the objectives pursued by Regulation 1049/2001, notably to give the public the widest possible right of access to documents⁴, “*the exceptions to that right [...] must be interpreted and applied strictly*”⁵.

Out of the 24 documents identified, we are pleased to grant you **full access to one report (document 1) and partial access to the remaining 23 documents**. Please note that some parts of the documents concern matters other than TTIP and have therefore been removed as they fall outside the scope of your request.

In particular, as regards documents 2, 3, 4, 5, 6, 7, 11, 13, 15, 17a, 17b, 20, 21, 22, 23 and 24 only the names of the participants to the meetings and correspondence, as well as other personal identifiers (e.g. e-mail addresses, telephone numbers, office numbers) have been redacted, pursuant to article 4(1)(b) of Regulation 1049/2001 and in accordance with Regulation (EC) No 45/2001 (“Regulation 45/2001”)⁶. Hence, the main content of these documents is accessible. Moreover, the names of members of Cabinet and senior management of the Commission starting from the Director level, have all been disclosed.

As regards documents 8, 9, 10, 12, 14, 16 and 18, in addition to personal data covered by the exception of article 4(1)(b) of Regulation 1049/2001, other information has been redacted as it is covered by the exceptions set out in Articles 4(1)(a) third indent, 4(2) first and second indent and 4(3) first subparagraph of Regulation 1049/2001.

² Judgment in *Sweden and Maurizio Turco v Council*, Joined cases C-39/05 P and C-52/05 P, EU:C:2008:374, paragraph 35.

³ *Id.*, paragraphs 37-43. See also judgment in *Council v Sophie in 't Veld*, C-350/12 P, EU:C:2014:2039, paragraphs 52 and 64.

⁴ See Regulation (EC) No 1049/2001, recital (4).

⁵ Judgment in *Sweden v Commission*, C-64/05 P, EU:C:2007:802, paragraph 66.

The reasons justifying the application of the abovementioned exceptions are set out below in sections 1.1, 1.2, 1.3, 1.4 and 1.5. Section 2 provides an assessment of whether there exists an overriding public interest in the disclosure.

1.1. Protection of international relations (documents 8, 10, 12, 14, 16 and 18)

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.”

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”⁷. More specifically, the General Court has stated that “it is possible that the disclosure of European Union positions in international negotiations could damage the protection of the public interest as regards international relations” and “have a negative effect on the negotiating position of the European Union”⁸. It added that “in the context of international negotiations, unilateral disclosure by one negotiating party of the negotiating position of one or more other parties [...] may be likely to seriously undermine, for the negotiating party whose position is made public and, moreover, for the other negotiating parties who are witnesses to that disclosure, the mutual trust essential to the effectiveness of those negotiations”⁹.

Document 8 is a report of a meeting between DG Trade and representatives of HSBC on TTIP. One sentence at the end of the second paragraph of the report has been removed, as its disclosure would give indications of the EU's strategy and interests that may or may not be pursued vis-à-vis the US counterparts in the TTIP negotiations.

Document 10 is a report of a meeting between EU and US negotiators and the representatives of the architects' profession. Parts of this document have been removed as they contain internal assessments, opinions and comments of the EU negotiators based on specific points that were discussed at the meeting and internal considerations regarding the tactical approaches, objectives and options that the EU may pursue in the negotiations. Some of the redacted parts also reveal details of the US position, which if disclosed would undermine the mutual trust between the negotiators on both sides.

In document 12, an email containing a report of a meeting with ESF, a sentence has been withheld as it contains an internal assessment regarding a position that the US might adopt in the

⁶ Regulation (EC) No 45/2001 of the European Parliament and the 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, OJ L 8, 12.1.2001, p. 1.

⁷ Judgment in *Council v Sophie in 't Veld*, C-350/12 P, EU:C:2014:2039, paragraph 63.

⁸ Judgment in *Sophie in 't Veld v Commission*, T-301/10, EU:T:2013:135, paragraphs 123-125.

⁹ *Id.*, paragraph 126.

context of the TTIP negotiations. A sentence has also been redacted in document 14, which contains the report of a panel discussion on services and TTIP, as it contains internal considerations regarding objectives that the EU could pursue in the negotiations with the US.

Document 16 is the report of a mission of a Commission official in Hungary in March 2015. A sentence has been redacted as it contains an internal assessment of the political situation in one of the Member States. Disclosing this passage would undermine the negotiating position of the EU, as this information could be exploited to the disadvantage of the EU and its strategic interests in the negotiations.

Finally, document 18 is an email of Verband der TÜV e.V. (VdTÜV) to DG Trade containing as an attachment a legal opinion commissioned by VdTÜV from a law firm. This legal opinion was provided by VdTÜV to the Commission in support of VdTÜV's position regarding specific issues that are discussed in the context of the TTIP negotiations and that the association would like to be reflected in a possible future agreement with the US. It highlights a number of options that the EU may or may not pursue in the ongoing discussions with the US. Part of the email contained in document 18 and the legal opinion as withheld under the exception of Article 4.1(a) third indent as putting this information in the public domain would uncover to the US positions and fall back options that the EU might consider pursuing in the negotiations.

The information redacted in documents 8, 10, 12, 14, 16 and 18 was meant for internal use as a basis to establish EU positions, strategies, objectives and way forward on specific aspects of the negotiations. In order to ensure the best possible outcome in the public interest, the EU needs to retain a certain margin of manoeuvre to shape and adjust its tactics, options and fall back positions in function of how the discussions evolve. Exposing internal views and considerations would weaken the negotiating capacity of the EU, reduce its margin of manoeuvre in the negotiations and be exploited by our trading partner to extract specific concessions, thereby undermining the strategic interests of the EU and consequently, the protection of the public interest as regards international relations. Indeed, the success of the negotiations depends to a large extent on the protection of objectives, tactics and fall-back positions of the parties involved. When closing her own initiative inquiry on transparency in TTIP, the European Ombudsman herself recognised that *"the Commission needs to create a context in which it can negotiate effectively with the US on TTIP, so as to deliver the best possible deal for the Union and its citizens. This may mean that the Commission can legitimately keep confidential certain information and documents, at least during certain stages of the negotiations"*¹⁰.

Moreover, disclosing those passages that reveal, even indirectly, the position of the US, is likely to upset the mutual trust between the negotiators, and thus undermine their working relations. Preserving a certain level of discretion and special care in handling documents that reflect the positions of our negotiating partners is essential in order not to jeopardise the

¹⁰ <http://www.ombudsman.europa.eu/en/cases/decision.faces/en/58668/html.bookmark>

progress of the ongoing discussions. Negotiating partners need to be able to confide in each other's discretion and to trust that they can engage in open and frank exchanges of views without having to fear that these views and positions may in the future be exposed. As the Court recognised in Case T-301/10 *in't Veld v Commission*, "[...] establishing and protecting a sphere of mutual trust in the context of international relations is a very delicate exercise"¹¹. If the redacted information were to be disclosed, the US as well as other negotiating partners of the EU may fear that in the future their positions would be revealed and they may as a result refrain from engaging with the EU.

1.2. Protection of privacy and 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: [...] privacy and the integrity of the individual, in particular in accordance with Community legislation regarding the protection of personal data".

The Court of Justice has ruled that "where an application based on Regulation 1049/2001 seeks to obtain access to documents containing personal data" "the provisions of Regulation 45/2001, of which Articles 8(b) and 18 constitute essential provisions, become applicable in their entirety"¹².

Article 2(a) of Regulation 45/2001 provides that "'personal data' shall mean any information relating to an identified or identifiable natural person [...]". The Court of Justice has confirmed that "there is no reason of principle to justify excluding activities of a professional [...] nature from the notion of 'private life'"¹³ and that "surnames and forenames may be regarded as personal data"¹⁴, including names of the staff of the institutions¹⁵.

According to Article 8(b) of this Regulation, personal data shall only be transferred to recipients if they establish "the necessity of having the data transferred" and additionally "if there is no reason to assume that the legitimate interests of the data subjects might be prejudiced". The Court of Justice has clarified that "it is for the person applying for access to establish the necessity of transferring that data"¹⁶.

Documents 2 to 24 contain personal data, such as names, phone and office numbers, job titles and other personal information that allows the identification of natural persons.

¹¹ Judgment in *Sophie in't Veld v European Commission*, T-301/10, EU:T:2013:135, paragraph 126.

¹² Judgment in *Guido Strack v Commission*, C-127/13 P, EU:C:2014:2250, paragraph 101; see also judgment in *Commission v Bavarian Lager*, C-28/08 P, EU:C:2010:378, paragraphs 63 and 64.

¹³ Judgment in *Rechnungshof v Rundfunk and Others*, Joined cases C-465/00, C-138/01 and C-139/01, EU:C:2003:294, paragraph 73.

¹⁴ Judgment in *Commission v Bavarian Lager*, C-28/08 P, EU:C:2010:378, paragraph 68.

¹⁵ Judgment in *Guido Strack v Commission*, C-127/13 P, EU:C:2014:2250, paragraph 111.

¹⁶ *Id.*, paragraph 107; see also judgment in *Commission v Bavarian Lager*, C-28/08 P, EU:C:2010:378, paragraph 77.

I note that that you have not established the necessity of having these personal data transferred to you. Moreover, it cannot be assumed, on the basis of the information available, that disclosure of such personal data would not prejudice the legitimate interests of the persons concerned. Therefore, these personal data shall remain undisclosed in order to ensure the protection of the privacy and integrity of the individuals concerned.

1.3. Protection of commercial interests (documents 9 and 18)

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 [...] 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 indent¹⁷, 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 secrecy¹⁸. 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*”¹⁹.

Document 9 is the report of a meeting between representatives of DG Trade and Ebay. The first paragraph of the report has been redacted as it contains confidential information regarding specific aspects of Ebay’s business, its economic performance and relationship with other players on the market, and future plans. This information is not known to the public, and if disclosed it would seriously undermine the companies’ competitive position, affect its relationships with relevant actors and stakeholders and expose it a risk of retaliation from other players on the market.

As mentioned above, document 18 is an email from VdTÜV to DG Trade, following up on an earlier meeting that the association had with representatives of DG Trade. One of the attachments to this email, which is the legal opinion of a law firm to VdTÜV on the implementation of the TTIP under US law, cannot be disclosed as it entirely falls under the exception established in Article 4(2) first indent of Regulation 1049/2001. VdTÜV was consulted on the public disclosure of this document and opposed it on the ground that this would undermine its commercial interests and those of its members. VdTÜV commissioned the legal opinion contained in document 18 in the framework of a legally privileged client-attorney relationship with a law firm, and paid for this service. Disclosing this legal opinion to the public would confer an undue economic advantage to other economic operators in the market as it

¹⁷ Judgment in *Terezakis v Commission*, T-380/04, EU:T:2008:19, paragraph 93.

¹⁸ See Article 339 of the Treaty on the Functioning of the European Union.

¹⁹ Judgment in *Bank Austria v Commission*, T-198/03, EU:T:2006:136, paragraph 29.

would allow them to free ride on a service which was paid for by VdTÜV and to which they have not contributed.

1.4. Protection of legal advice (document 18)

Article 4(2) second indent, of Regulation 1049/2001 provides that “[t]he institutions shall refuse access to a document where disclosure would undermine the protection of: [...] court proceedings and legal advice [...] unless there is an overriding public interest in disclosure”.

In its recent ruling in Case T-755/14, the General Court clarified that “the concept of ‘legal advice’ relates to the content of a document and not to its author or its addressees. As is apparent from a literal interpretation of the words ‘legal advice’, this is a question of advice relating to a legal issue, regardless of the way in which that advice is given. In other words, it is irrelevant, for the purposes of applying the exception relating to the protection of legal advice, whether the document containing that advice was provided at an early, late or final stage of the decision-making process. In the same way, the fact of the advice having been given in a formal or informal context has no effect on the interpretation of that concept.”²⁰ Moreover, “there is nothing in the wording of the second indent of Article 4(2) of Regulation No 1049/2001 to support the conclusion that that provision concerns only advice provided or received internally by an institution. [...] Although, as a general rule, an institution seeks advice from its own Legal Service, there is nothing to prevent that institution, where appropriate, from outsourcing its request for that advice. That is the case, for example, where the institution in question seeks advice from a law firm.”²¹

The legal opinion attached in document 18 is covered also by the exception established in Article 4(2) second indent of Regulation 1049/2001. The document qualifies as a “legal advice” within the meaning of Article 4(2) second indent as it concerns a legal issue, *i.e.* the implementation and enforceability of TTIP under US law. Moreover, its disclosure would undermine the institution’s interest in receiving frank, objective and comprehensive advice from third parties. Indeed, there exists a reasonably foreseeable risk that if the legal opinion is disclosed to the public third parties would refrain from providing the Commission with such input for fear of uncovering their position in context of the negotiation of international agreements and exposing their relationship with other stakeholders and regulators in third countries to potential negative repercussions. Continuing to receive such open, frank and comprehensive advice from third parties is key to allow the Commission to pursue the EU strategic interests in the context of trade negotiations with third countries.

1.5. Protection of the decision-making process (document 16)

²⁰ Judgment in *Herbert Smith Freehills v Commission*, T-755/14, ECLI:EU:T:2016:48, paragraph 47

²¹ *Id.*, paragraphs 48 and 50.

Article 4(3) of Regulation 1049/2001 provides that “[a]ccess to a document drawn up by an institution for internal use or received by an institution, which relates to a matter where the decision has not been taken by the institution, shall be refused if disclosure of the document would seriously undermine the institution’s decision-making process, unless there is an overriding public interest in disclosure”.

The jurisprudence of the EU Courts has also recognized that *"the protection of the decision-making process from targeted external pressure may constitute a legitimate ground for restricting access to documents relating to the decision-making process"*²² and that the capacity of its staff to express their opinions freely must be preserved²³ so as to avoid the risk that the disclosure would lead to future self-censorship. As the General Court put it, the result of such self-censorship *"would be that the Commission could no longer benefit from the frankly-expressed and complete views required of its agents and officials and would be deprived of a constructive form of internal criticism, given free of all external constraints and pressures and designed to facilitate the taking of decisions [...]"*.²⁴

The redacted passage in document 16 contains the personal views and impressions of a Commission official regarding the political situation in one Member States in connection with a matter, the TTIP negotiations, where a decision has not yet been taken. Exposing internal views and considerations expressed in this context would subject the Commission and the Member States to external pressure, potential manipulation and unfounded conclusions both from external stakeholders and from our negotiating partners. It would also restrict the free exchange of views within the Commission staff and between the Commission and other relevant actors. Finally, it would have a negative impact on decisions still to be taken by the EU by giving out elements of the Commission's assessment and its possible future approaches. Protecting the confidentiality of internal views and opinions allows for the parties involved to speak freely and frankly. Reducing this degree of confidentiality would lessen the trust of the parties involved and give rise to a risk of self-censorship, which would in turn undermine the quality of the internal consultation and decision making process.

2. OVERRIDING PUBLIC INTEREST

The exceptions laid down in Article 4.2 and 4.3 of Regulation 1049/2001 apply 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. The Court of Justice has acknowledged that it is for institution concerned by the request to balance the particular interest protected by non-disclosure against the public interest. In this respect, the public

²² Judgment in *MasterCard and Others v Commission*, T-516/11, EU:T:2014:759, paragraph 71

²³ Judgment in *Muñiz v Commission*, T-144/05, EU:T:2008:596, paragraph 89.

²⁴ Judgment in *MyTravel v Commission*, T-403/05, EU:T:2008:316, paragraph 52.

interest is of particular relevance where the institution *"is acting in its legislative capacity"*²⁵ as transparency and openness of the legislative process strengthen the democratic right of European citizens to scrutinise the information which has formed the basis of a legislative act.²⁶

The negotiations of international agreements *"fall within the domain of the executive"*; this entails that *"public participation in the procedure relating to the negotiation and the conclusion of an international agreement is necessarily restricted, in view of the legitimate interest in not revealing strategic elements of the negotiations"*.²⁷ Documents 9, 16 and 18 all pertain to the domain of the executive functions of the EU as they relate to the negotiation of an international agreement.

After careful assessment, we have concluded that on balance, preserving the commercial interests of the stakeholders involved in the consultations, the ability of the Commission to receive frank, open and comprehensive legal advice and to preserve the ongoing decision-making in the context of the TTIP negotiations, prevail over transparency in this specific case. In particular, disclosure at this stage of the TTIP negotiations of certain parts of the documents concerned would undermine the possibility of achieving the best possible outcome in the public interest. Such public interest would instead be better served by the possibility for the Commission to complete the decision-making process in question without external pressure. Moreover the public interest also lies on the protection of the legitimate confidentiality interests of the stakeholders concerned and the ability of the Commission to receive legal advice so as to ensure that the institution continues to receive useful contributions in relation to the ongoing discussions with the US without undermining the position of the stakeholders concerned.

We hope this information released meets your needs. Please note that you may reuse the fully released document free of charge for non-commercial and commercial purposes provided that the source is acknowledged, that you do not distort the original meaning or message of the documents. Please note that the Commission does not assume liability stemming from the reuse.

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.

²⁵ Judgment in *Sweden and Maurizio Turco v Council*, Joined cases C-39/05 P and C-52/05 P, EU:C:2008:374, paragraph 46.

²⁶ *Id.*, paragraph 67.

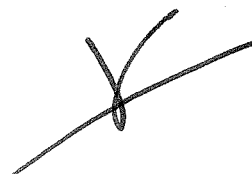
²⁷ Judgment in *Sophie in 't Veld v European Commission*, T-301/10, EU:T:2013:135, paragraphs 120 and 181; see also Judgment in *Sophie in 't Veld v Council*, T-529/09, EU:T:2012:215, paragraph 88.

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
Secretary-General
Transparency unit SG-B-4
BERL 5/282
B-1049 Brussels

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

Yours sincerely,

A handwritten signature in black ink, consisting of a stylized 'J' and 'L' followed by a horizontal line.

Jean-Luc DEMARTY

Enclosures:

- Annex I – List of documents disclosed, including justification under Regulation 1049/2001
- Annex II – Documents disclosed

GestDem Knoll 2015/5124

Document	ARES number	Date	Interlocutor	Release: Yes/ No/ Partial	Reason(*)
1	Ares(2015)4400126	2014 09 12	ORGALIME	YES	*Art 4(1)(b). *Parts of the document fall outside the scope of the request as they concern subject-matters other than TTIP.
2	Ares(2015)5516608	2014 12 12	Architects Council of Europe (ACE)	Partial	*Art 4(1)(b). *Parts of the document fall outside the scope of the request as they concern subject-matters other than TTIP.
3	Ares(2015)5515504	2014 12 16	ESF	Partial	*Art 4(1)(b). *Parts of the document fall outside the scope of the request as they concern subject-matters other than TTIP.
4	Ares(2015)5516365	2014 12 16	ESF and TPC S&I	Partial	*Art 4(1)(b). *Parts of the document fall outside the scope of the request as they concern subject-matters other than TTIP.
5	Ares(2015)5491105	2014 12 17	Eurocommerce	Partial	*Art 4(1)(b). *Parts of the document fall outside the scope of the request as they concern subject-matters other than TTIP.
6	Ares(2015)4588091	2015 01 13	ORGALIME	Partial	*Art 4(1)(b). *Parts of the document fall outside the scope of the request as they concern subject-matters other than TTIP.
7	Ares(2015)260054	2015 01 21	IBM	Partial	*Art 4(1)(b). *Parts of the document fall outside the scope of the request as they concern subject-matters other than TTIP.
8	Ares(2015)4612636	2015 01 28	HSBC	Partial	*Art 4(1)(a) third indent. *Art 4(1)(b).
9	Ares(2015)576136	2015 02 10	Ebay	Partial	*Art 4(1)(b). *Art 4(2) first indent.
10	Ares(2015)807087	2015 02 13	EU-US Mutual Recognition of Professional Qualifications for Architects	Partial	*Art 4(1)(a) third indent. *Art 4(1)(b).
11	Ares(2015)5969847	2015 03 05	Chevron	Partial	*Art 4(1)(b). *Parts of the document fall outside the scope of the request as they concern subject-matters other than TTIP.
12	Ares(2015)1214084	2015 03 16	ESF	Partial	*Art 4(1)(a) third indent. *Art 4(1)(b).
13	Ares(2015)5514303	2015 03 19	ESF	Partial	*Art 4(1)(b). *Parts of the document fall outside the scope of the request as they concern subject-matters other than TTIP.
14	Ares(2015)1327271	2015 03 26	ESF/CEPS	Partial	*Art 4(1)(a) third indent. *Art 4(1)(b).
15	Ares(2015)1327285	2015 03 26	Eurocommerce	Partial	*Art 4(1)(b). *Parts of the document fall outside the scope of the request as they concern subject-matters other than TTIP.

16	Ares(2016)198666	2015 03 26	TTIP conference and meetings, Budapest	Partial	*Art 4(1)(a) third indent. *Art 4(1)(b). *Art 4(3) first subparagraph.
17a	Ares(2015)1504204/	2015 03 31	ESF	Partial	*Art 4(1)(b). *Parts of the document fall outside the scope of the request as they concern subject-matters other than TTIP.
17b	Ares(2015)1489763	2015 03 31	ESF	Partial	*Art 4(1)(b). *Parts of the document fall outside the scope of the request as they concern subject-matters other than TTIP.
18	Ares(2015)1977803	2015 04 14	Verband der TÜV e.V. (VdTÜV)	Partial	*Art 4(1)(a) third indent. *Art 4(1)(b). *Art 4(2) first and second indent.
19	not registered in Ares	2015 04 22	Lilly Bio-Medicines	NO REPORT	
20	Ares(2015)2515766	2015 05 28	NATO	Partial	*Art 4(1)(b). *Art 4(1)(b).
21	Ares(2015)2628363	2015 06 22	CityUK	Partial	*Parts of the document fall outside the scope of the request as they concern subject-matters other than TTIP.
22	Ares(2015)3762113	2015 08 28	UPS	Partial	*Art 4(1)(b). *Parts of the document fall outside the scope of the request as they concern subject-matters other than TTIP.
23	Ares(2015)3836026	2015 09 15	Atlantic Council	Partial	*Art 4(1)(b).
24	Ares(2015)4684500	2015 10 06	ORGALIME	Partial	*Art 4(1)(b).