



EUROPEAN COMMISSION

DIRECTORATE-GENERAL FOR INTERNAL MARKET, INDUSTRY, ENTREPRENEURSHIP
AND SMES
Chemicals and Consumer Industries
The Director

Brussels
GROW.D.2/AS
GROW.DDG1.D.2(2020)5042223

Vicky Cann
Corporate Europe Observatory

Per email only to:
ask+request-8371-
85d7ba0b@asktheeu.org

Subject: Reply to your access to document request Gestdem 2020/4358

Dear Madam,

We refer to your e-mail of 16 July 2020 in which you make a request for access to documents, registered on 16 July 2020 under the above-mentioned reference number.

You request access to “a list of all lobby meetings (including face to face, phone calls, conference calls etc) held since 29 January 2020 where the Chemicals Strategy for Sustainability was discussed. The list should include the names of the individuals and organisations participating; the date; the agenda; and any minutes / notes produced. I would additionally like to receive any emails or other correspondence from lobby groups related to the Chemicals Strategy for Sustainability received or sent since 29 January 2020.

Please provide all responses electronically via this site.”

I consider your request to cover documents held up to the date of your initial application, *i.e.* 16 July 2020.

Your application concerns the 13 documents and their attachments listed in Annex.

With regard to all the documents listed above, 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;
- handwritten signatures/abbreviated signatures of 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.

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.

Minutes/summary records were drawn up for internal use under the responsibility of the relevant services of the Directorate-General for GROW. It solely reflects the services' 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 within 15 working days upon receipt of this letter to the Secretariat-General of the Commission at the following address:

European Commission

Secretariat-General

Unit C.1. 'Transparency, Document Management and Access to Documents'

BERL 7/076

B-1049 Brussels, or by email to: sg-acc-doc@ec.europa.eu

Yours faithfully,

(e-signed)

Carlo PETTINELLI