



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR HEALTH AND FOOD SAFETY

Resource management and better regulation  
**Better regulation**

Brussels  
SANTE.A.1CG/RM SANTE.A.1.002(2022)6278844

Ms CARLILE Clare  
Ruppinerstraße 39,  
Berlin 13355,  
Germany.

***By e-mail only:***  
[ask+request-11638-222525f7@asktheeu.org](mailto:ask+request-11638-222525f7@asktheeu.org)

Dear Madam,

**Subject: Your application for access to documents – GESTDEM**

We refer to your email of 22 July 2022 in which you make a request for access to documents, registered on 26 July 2022 under the above-mentioned reference number.

**1. Scope of your request**

You requested access to:

*“Names of attendees at all meetings; names of organisations they represented; agendas from the meetings; minutes of meetings; details of the locations of meetings; presentation slides used, and any other materials shared or used (e.g. briefings, leaflets), including in preparation and after the meetings took place; names and organisations of any speakers or external guests for the following:*

*Meetings: Euroseeds with Giorgios Rossides, Cabinet member of Stella Kyriakides, Roberto Reig Rodrigo, Cabinet member of Stella Kyriakides, Ines Prainsack, Cabinet member of Stella Kyriakides on 16/06/2022”.*

**2. Identification and assessment of relevant documents**

We have identified 1 document that fall within the scope of your request.

Having examined the document under the provisions of Regulation (EC) No 1049/2001, we have come to following conclusion, which is further explained below:

- The document may be partially disclosed as their full disclosure is prevented by one exceptions to the right of access laid down in Article 4 of Regulation (EC) No 1049/2001.

We enclose a copy of the documents redacted of the parts that cannot be disclosed, as further explained below.

This document was drawn up for internal use under the responsibility of the relevant services/officials of the Directorate-General for SANTE. It solely reflects the services'/author's interpretation of the interventions made and do not set out any official position of the third parties to which the document refers, which were not consulted on its content. They do not reflect the position of the Commission and cannot be quoted as such.

### **3. Partial disclosure of documents**

*a) Protection of the privacy and integrity of the individual, in particular in accordance with Community legislation regarding the protection of personal data - Article 4(1)(b) of Regulation (EC) No 1049/2001*

With regard to the document identified a complete disclosure of the 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 it contains 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 information of staff 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, we 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.

In accordance with the above mentioned, partial access is granted to the mentioned document, expunged of personal data.

### **4. Means of redress**

In accordance with Article 7(2) of Regulation (EC) No 1049/2001, you are entitled to make 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 Secretary-General of the Commission at the following address:

European Commission  
Secretariat-General  
Transparency, Document Management & Access to Documents (SG.C.1)  
BERL 7/076  
B-1049 Bruxelles  
or by email to: [sg-acc-doc@ec.europa.eu](mailto:sg-acc-doc@ec.europa.eu)

Yours faithfully,

Carmen GARAU  
Head of Unit

Enclosure: BTO meeting Cab with Euroseeds 16 June Ares(2022)4552531