



EUROPEAN COMMISSION
DIRECTORATE-GENERAL MIGRATION and HOME AFFAIRS

Directorate E: Migration and Security Funds; Financial Resources and Monitoring
Unit E.2: National programmes for South and East Europe; AMIF/ISF Committee

By registered letter with acknowledgment of receipt

Mrs Estela Casajuana
Singel 422-K,
1016AK Amsterdam,
The Netherlands

Advance copy by email: ask+request-5402-
0038c897@asktheeu.org

Subject: Your application for access to documents – Ref GestDem No 2018/2089

Dear Mrs Casajuana,

We refer to your e-mail dated 12/04/2018 in which you make a requests for access to documents, registered on the same day under the above mentioned reference number.

You requested access to documents, which contain the following information:

1. All observations made by the European Commission to the proposed national programmes submitted by Spain, Italy and Greece regarding AMIF and ISF-Borders and Visa;

Having examined your request under the provisions of Regulation (EC) No 1049/2001 regarding public access to documents, the following documents have been identified to fall under point 1 of your request:

A. Observations on the proposed multiannual national programme under the Asylum, Migration and Integration Fund for Greece, Italy and Spain

- Document 1: Observations letter on the proposed national programme under the Asylum, Migration and Integration fund for Greece formally submitted on 31 October 2014 (*ref: Ares (2014)4292762*);
- Document 2: Observations letter on the proposed national programme under the Asylum, Migration and Integration fund for Greece formally submitted on 15 May 2015 (*ref: Ares (2015)2551397*);

- Document 3: Observations letter on the proposed national programme under the Asylum, Migration and Integration fund for Greece formally submitted on 19 June 2015 (*ref: Ares (2015)2688180*);
- Document 4: Observations letter on the proposed national programme under the Asylum, Migration and Integration fund for Greece formally submitted on 30 June 2015 (*ref: Ares (2015)3017504*);
- Document 5: Observations letter on the proposed national programme under the Asylum, Migration and Integration fund for Italy formally submitted on 2 December 2014 (*ref: Ares (2015)501301*);
- Document 6: Observations letter on the proposed national programme under the Asylum, Migration and Integration fund for Italy formally submitted on 2 April 2015 (*ref: Ares (2015)1895054*);
- Document 7: Observations letter on the proposed national programme under the Asylum, Migration and Integration fund for Italy formally submitted on 29 May 2015 (*ref: Ares (2015)2599299*);
- Document 8: Observations letter on the proposed national programme under the Asylum, Migration and Integration fund for Italy formally submitted on 25 June 2015 (*ref: Ares (2015)2832075*);
- Document 9: Observations letter on the proposed national programme under the Asylum, Migration and Integration fund for Spain formally submitted on 1 December 2014 (*ref: Ares (2015)360867*);
- Document 10: Observations letter on the proposed national programme under the Asylum, Migration and Integration fund for Spain formally submitted on 18 March 2015 (*ref: Ares (2015)1493236*);
- Document 11: Observations letter on the proposed national programme under the Asylum, Migration and Integration fund for Spain formally submitted on 12 May 2015 (*ref: Ares (2015)2500797*);

B. Observations on the proposed multiannual national programme under the Internal Security Fund for Greece, Italy and Spain

- Document 12: Observations on the proposed multiannual national programme under the Internal Security Fund for Greece formally submitted on 7 November 2014 (*ref: Ares (2014)4182968*);
- Document 13: Observations on the proposed multiannual national programme under the Internal Security Fund for Greece formally submitted on 30 June 2015 (*ref: Ares (2015)2995648*);

- Document 14: Observations on the proposed multiannual national programme under the Internal Security Fund for Italy formally submitted on 2 December 2014 (*ref: Ares (2015)496420*);
- Document 15: Observations on the proposed multiannual national programme under the Internal Security Fund for Italy formally submitted on 8 June 2014 (*ref: Ares (2015)2649069*);
- Document 16: Observations on the proposed multiannual national programme under the Internal Security Fund for Italy formally submitted on 30 June 2015 (*ref: Ares (2015)3047182*);
- Document 17: Observations on the proposed multiannual national programme under the Internal Security Fund for Spain formally submitted on 3 October 2014 (*ref: Ares (2014)3987344*);
- Document 18: Observations on the proposed multiannual national programme under the Internal Security Fund for Spain formally submitted on 24 February 2015 (*ref: Ares (2015)1451282*);
- Document 19: Observations on the proposed multiannual national programme under the Internal Security Fund for Spain formally submitted on 20 May 2015 (*ref: Ares (2015)2599344*);
- Document 20: Observations on the proposed multiannual national programme under the Internal Security Fund for Spain formally submitted on 1 July 2015, (*ref: Ares (2015)2998386*);

Following an examination of the above documents identified as falling under your request, pursuant to the provisions of Article 4 (1) (b) of Regulation (EC) No 1049/2001, access to a document has to be refused if its 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 applicable legislation in this field is Regulation (EC) No 45/2001 of the European Parliament and 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.

When access is requested to documents containing personal data, Regulation (EC) No 45/2001 becomes fully applicable. 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 to them and if there is no reason to assume that the legitimate rights of the persons concerned might be prejudiced.

We consider that, with the information available, the necessity of disclosing the aforementioned personal data to you has not been established and/or that it cannot be assumed that such disclosure would not prejudice the legitimate rights of the persons concerned. Therefore, we are disclosing the documents listed above expunged from this personal data.

Furthermore, we would like to specify that document 9, point 5, second dash, contained a clerical mistake thus it has been corrected.

Kindly note that you may reuse the documents requested free of charge for non-commercial and commercial purposes provided that the source is acknowledged and that you do not distort the original meaning or message of the document/documents. Please note that the Commission does not assume any liability stemming from the reuse.

In case you would disagree with the assessment that the expunged data are personal data which can only be disclosed if such disclosure is legitimate under the rules of personal data protection, you are entitled, in accordance with Article 7(2) of Regulation 1049/2001, 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
Secretary-General
Transparency Unit SG-B-4
BERL 5/282
B-1049 Bruxelles

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

Sincerely yours,

e-signed

Bernadette FREDERICK
Head of Unit