



## EUROPEAN COMMISSION

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

Planning, finance, data

**B1. Planning & Briefings**

Brussels  
GROW.B.1/AS

Nina HOLLAND  
9 rue d'Edimbourg 26  
1050 - Bruxelles  
Belgium

[ask+request-9350-  
9a47efba@asktheeu.org](mailto:ask+request-9350-9a47efba@asktheeu.org)

**Subject: Your application for access to documents – GESTDEM 2021/2446**

Dear Ms Holland,

We refer to your e-mail of 18 April 2021 in which you make a request for access to documents, registered on 19 April 2021 under the above-mentioned reference number.

You request access to: *“any documents since 01 January 2020 until now including emails, briefings, reports, as well as attachments, and a list of meetings with detailed minutes and any other reports of such meetings - Sent to or received from Croplife Europe/European Crop Protection Association (ECPA), Syngenta, Corteva (DowDupont), Bayer, BASF, CEFIC, the European Crop Care Association (ECCA), Arysta, BusinessEurope; or anyone acting on behalf of any of these companies and organisations; - Sent to or received from permanent representation staff, national ministry officials or other representatives of the governments of Germany, Italy and Hungary; regarding the export from the EU to third countries of hazardous chemicals that are banned in the European Union; as well as the planned ban on such exports as mentioned in the EU Chemicals Strategy for Sustainability adopted in October 2020.”.*

Please note that due to the wide scope of your request covering also areas falling under the responsibility of other Directorates-General, parts of your request have been attributed to other Directorates-Generals. This reply relates only to the documents held by DG GROW. You will receive the replies from the other respective Directorates-General in due course.

We have identified the enclosed 4 documents falling within the scope of your request.

With regard to the above mentioned 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.

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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](mailto:sg-acc-doc@ec.europa.eu)

Sincerely yours,

*Electronically signed*

Laurence de Richemont  
Head of Unit