

Rebecca Vaughan
ask+request-9936-7cce1bf6@asktheeu.org

Reference: LS/PS/2022/10

Request for public access to ECB documents

11 February 2022

Dear Ms Vaughan,

On 25 October 2021 the European Central Bank (ECB) received your application for public access to the documents reflecting positions of the banking sector with regard to the 2022 ECB Climate Risk Stress Test.

On 21 December 2021, due to the need to consult the authors of third-party documents and to conduct a subsequent assessment, the ECB extended the time limit for its reply by an additional 20 working days in accordance with Article 7(3) of [Decision ECB/2004/3](#) of the European Central Bank.

After having carefully examined your request in accordance with Decision ECB/2004/3, we have identified five ECB documents of relevance to your application. A comprehensive list of those documents has been provided in the Annex to this letter.

Following a thorough assessment in accordance with the requirements set out in Decision ECB/2004/3, the ECB considers that full access to the documents can be granted since none of the exceptions listed in Article 4 of that Decision apply. The identified documents are made available on the ECB's Public Register of Documents¹.

Where applicable, parts containing personal data of third parties have been redacted, together with any information that would make the data subjects identifiable. Personal data are protected by Article 4(1)(b) of Decision ECB/2004/3 in conjunction with Article 9 of [Regulation \(EU\) 2018/1725](#) of the European Parliament

¹ See the [ECB's Public Register of Documents](#).

and of the Council. Article 9(1)(b) of Regulation (EU) 2018/1725 stipulates that, for the transfer of personal data, the recipient must establish a necessity to have personal data transmitted. Since you have not established such a necessity, access to personal data in the documents must be refused on the basis of Article 4(1)(b) of Decision ECB/2004/3.

Please note that, in line with Article 10 of Decision ECB/2004/3, "Documents released in accordance with this Decision shall not be reproduced or exploited for commercial purposes without the ECB's prior specific authorisation. The ECB may withhold such authorisation without stating reasons."

Yours sincerely,

[signed]

Petra Senkovic
Director General Secretariat

[signed]

Margarita-Louiza Karydi
Head of the Compliance and Governance Division

Encl.

Annex

Annex

	Description	Disclosure	Exemption
1	Association for Financial Markets in Europe (AFME) letter on ECB approach to climate risk stress testing in 2022, 25 June 2021	Full	Article 4(1)(b) of Decision ECB/2004/3 (<i>protection of personal data</i>)
2	European Banking Federation (EBF) comments and questions on the ECB Climate Stress Testing, 25 June 2021 ^[1]	Full	
3	Annex to the European Banking Federation (EBF) comments and questions on the ECB Climate Stress Testing, 24 June 2021	Full	
4	EURO CRO Group letter on the 2022 SSM climate risk stress test, 25 June 2021	Full	Article 4(1)(b) of Decision ECB/2004/3 (<i>protection of personal data</i>)
5	Annex to the EURO CRO Group letter on the 2022 SSM climate risk stress test, 24 June 2021	Full	