



**SG.2**  
**Acting Head of Division**

Brussels, 14 October 2021  
eeas.sg.2 (2021) 6586864

Mr Samuel Stolton

*Subject: Your request for access to documents of 17 September 2021*  
*Our ref: 2021/141*

Dear Mr Stolton,

I would like to thank you for your request for access to documents, which the EEAS has examined in the framework of Regulation (EC) No 1049/2001.<sup>1</sup>

After a search in the EEAS filing systems, document management databases and archives, the EEAS has identified the following documents matching your request, as referenced hereafter:

1. ST 9155 2021 INIT - Lines To Take on China's Global Initiative on Data Security
2. ST 8038 2021 REV 1 - Draft Lines To Take on China's Global Initiative on Data Security
3. ST 8038 2021 INIT - Draft Lines To Take on China's Global Initiative on Data Security

Our examination concluded that the identified documents contain EU Member States views intended for internal discussions on aspects related to EU security, defence and international relations matters.

The documents contain information necessary for the preparation of the ongoing negotiations on cyber issues and related data security matters within multilateral fora. In that regard, they include positions of EU Member States and opinions on ongoing negotiations at international level. Disclosure of these documents to the general public would harm EU's international relations, as well as the EEAS relations with EU Member States, which shared their positions and opinions on the above mentioned issues, in the understanding that they would not be made public since they are intended to serve as the basis of ongoing discussions. It would

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<sup>1</sup> Regulation (EC) No 1049/2001 of the European Parliament and of the Council regarding public access to European Parliament, Council and Commission documents (hereafter the "Regulation").

also affect the EU's decision-making process in the area of cyber issues and data security, by revealing EU's internal assessments and the positions of the EU Member States, which would affect the margin of maneuver in the ongoing negotiation within the UN fora, as well as the preparation of the EU and its Member States positions on matters regarding the future of the cyberspace.

Therefore, I regret to inform you that we are not in a position to disclose these documents at this point in time, neither as a whole or partially, since it would seriously undermine the EU's public security and international relations as per Article 4(1)(a), first and third indent of the Regulation 1049/2001, as well as the EEAS decision-making process as per Article 4(3), first indent, of the Regulation 1049/2001.

Should you wish this position to be reviewed, you may confirm your initial request within 15 working days.

Yours sincerely,

*[e-signed]*

Guillem Riutord Sampol