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Mr. Eric Nodge
ask+request-7935-34877aa3@asktheeu.org

Subject: Your application for access to documents – Ref GESTDEM 2020/2569 - EUTF for Africa Monitoring & Oversight Reports -Initial Reply

Dear Mr Nodge,

We refer to your e-mail dated 6 May 2020 in which you make a request for access to documents, registered on the same date under the above mentioned reference number. I also refer to the e-mail of 19 May 2020¹, through which the time limit for handling your application has been extended by 15 working days, in accordance with article 7(3) of Regulation (EC) No 1049/2001².

1. SCOPE OF YOUR REQUEST

In your request, you ask for access to:

- 1) *Any information, data, or reports provided by RRF IOM (project T05-EUTF-HoA-REG-25) and Shire Alliance (project T05-EUTF-HoA-ET-51) to the European Commission (Trust Fund Manager) to comply with monitoring/oversight requirements, which may have been used by Trust Fund Managers to formulate annual reports;*
- 2) *A copy of the annual reports on activities submitted by the Trust Fund Manager of the Horn of Africa window to the Operational Committee for each year since 2016, per Article 7.2(e);*
- 3) *A copy of the annual and six-monthly financial reports prepared by the Trust Fund Manager/Accounting Officer of the Horn of Africa window for each year since 2016, per Article 7.2(g);*
- 4) *A copy of the annual reports since 2016, as transmitted by the Operational Committee to the Trust Fund Board, per Article 6.3(c), if at all modified from what was originally received from the Trust Fund Manager;*
- 5) *Minutes of any meeting of the Operational Committee in which the implementation, results, or effectiveness of internal control systems regarding project T05-EUTF-HoA-REG-25 was discussed, per Article 6.3(b);*

¹ Ares(2020)2640654

²Regulation (EC) No 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents, OJ L 145, 31.5.2001, p. 43.

- 6) *Minutes of any meeting of the Operational Committee in which the implementation, results, or effectiveness of internal control systems regarding project T05-EUTF-HoA-ET-51 was discussed, per Article 6.3(b);*
- 7) *A copy of the monthly and six-monthly reports provided by the Commission to the European Parliament on the implementation of EUTFs since 2016, per comments made in response to the 2018 study requested by the CONT committee of the European Parliament and conducted by the Policy Department for Budgetary Affairs*

We consider your request to cover documents held up to the date of your initial application, i.e. 6 May 2020.

As regards points (2) and (4) of your application, concerning a copy of the annual reports on activities submitted by the Trust Fund Manager of the Horn of Africa window to the Operational Committee for each year since 2016, per Article 7.2(e), and a copy of the annual reports since 2016, as transmitted by the Operational Committee to the Trust Fund Board, per Article 6.3(c), if at all modified from what was originally received from the Trust Fund Manager, please note that we have identified under point 2 and 4 the same documents, namely the EU Trust Fund Annual Reports as published on the EUTF website.

As regards point (3) of your application requesting annual and biannual financial reports, we would like to clarify that Biannual Reports from 2016 to 2019 have been identified, and so have the Annual Accounts from 2016 to 2018. With regards to the Annual Accounts from 2019, these have not been identified as they have not yet been validated at the date of your request. However, a part of the Financial Report for year 2019 is available in the 2019 Annual Report identified under points 2 and 4 (document 2.4 as listed in Annex A).

As regards point (7) of your application requesting a copy of the monthly and six-monthly reports provided by the Commission to the European Parliament on the implementation of EUTFs since 2016, based on the elements of your request and the information available, we understand this point as referring to the budgetary monthly reports on the EUTF produced by the Directorate-General for Budget (DG BUDG) of the European Commission. The reports are produced monthly, and have been shared with the European Parliament since March 2017. Therefore, we have not identified any existing document for the year 2016 and the first two months of 2017. In addition, we would like to clarify that reports from July and December of a given year can be considered as the six-monthly reports. Please note that the reports are cumulative, thus including information from the previous year as well.

Based on your application we have identified the documents listed in Annex A to this letter.

2. ASSESSMENT AND CONCLUSIONS UNDER REGULATION (EC) No 1049/2001

Having examined the documents requested under the provisions of Regulation (EC) No 1049/2001, we have come to the conclusion that most of them may be fully or partially disclosed, while access has to be fully denied for certain documents.

2.1. DOCUMENTS FULLY DISCLOSED

Full access is provided to the following documents: (3.1), (3.2), (3.3), (5.1.1), (5.1.6), and documents from (7.1) to (7.37) as per Annex A.

Please also note that Documents (1.2.1.1), (1.2.7.6), (2.1), (2.2), (2.3), (2.4) are public documents and web links are provided in Annex A.

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

2.2. DOCUMENTS PARTIALLY DISCLOSED

Partial disclosure refers to those documents parts which have been redacted, as their disclosure is prevented by exceptions to the right of access laid down in Article 4 of Regulation (EC) No 1049/2001.

Partial disclosure also refers to those documents parts of which have been redacted as they contain information not falling within the scope of your request. This is the case of documents (1.2.1), (1.2.1.2), (1.2.3), (1.2.3.1), (1.2.6.6), (3.4.1), (3.4.2), (3.5.1), (3.5.2), (3.6.1), (3.6.2), (3.7.1), (3.7.2), (5.1), (5.2), (5.3), (6.1) as listed in Annex A. The parts falling outside the scope of your application, namely, include: indication on the names and implementation status of projects other than T05-EUTF-HOA-ET-51 (for documents 1.2.1, 1.2.1.2, 1.2.3, 1.2.3.1, 1.2.4); financial information that does not relate to the Horn of Africa windows of the EU Trust Fund for Africa for documents (3.4.1), (3.4.2), (3.5.1), (3.5.2), (3.6.1), (3.6.2), (3.7.1), (3.7.2); the discussions held on projects that were presented for their approval during the Operational Committee meetings (other than T05-EUTF-HOA-REG-25 and T05-EUTF-HOA-ET-51), and on other issues not pertaining to project approval, for documents (5.1), (5.2), (5.3), (6.1).

Please note that all documents identified under point 1 of your request were received by the Commission from third parties, namely from the International Organization for Migration. For documents (1.1.1), (1.1.2), (1.1.3), (1.1.4) as per Annex A for the EU-IOM Initiative on Migrant Protection and Reintegration in the Horn of Africa (hereinafter, EU-IOM Initiative) and all the remaining documents from the Spanish Agency for International Development Cooperation (AECID) (documents from 1.2.1 to 1.2.8.10 as per Annex A) for the Alianza Shire. These documents are disclosed for information only and cannot be re-used without the agreement of the originator, who holds a copyright on them. They do not reflect the position of the Commission and cannot be quoted as such.

The detailed reasons for partial disclosure of documents are set out below.

2.2.1. Protection of privacy and the integrity of the individual

With regards to documents (1.1.1), (1.1.3), (1.1.4), (1.2.1), (1.2.1.3), (1.2.1.5), (1.2.1.6), (1.2.1.2), (1.2.2), (1.2.3), (1.2.3.1), (1.2.4), (1.2.4.2), (1.2.4.3), (1.2.5), (1.2.5.5), (1.2.5.6), (1.2.6), (1.2.6.5), (1.2.6.6), (1.2.6.7), (1.2.7), (1.2.7.4), (5.2), (5.3), (6.1) listed in Annex A, and taking into account the opinion of the third parties from which the documents originate, 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, as 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;
- other information relating to an identified or identifiable natural person, such as images of natural persons, signatures, functions of natural persons within their organization, specific information on the projects' target groups which could lead to their recognition.

Pursuant to 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 European Union legislation regarding the protection of personal data.

Pursuant to Article 9(1)(b) of the Data Protection Regulation 2018/1725³, ‘personal data shall only be transmitted to recipients established in the Union other than Union institutions and bodies if ‘[t]he recipient establishes that it is necessary to have the data transmitted for a specific purpose in the public interest and the controller, where there is any reason to assume that the data subject’s legitimate interests might be prejudiced, establishes that it is proportionate to transmit the personal data for that specific purpose after having demonstrably weighed the various competing interests’.

Only if these conditions are fulfilled and if the processing constitutes lawful processing in accordance with the requirements of Article 5 of Regulation 2018/1725, can the transmission of personal data occur.

In your request, you do not express any particular interest to have access to 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, 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.

2.2.2. Protection of commercial interests, including intellectual property

Article 4(2), first indent of Regulation 1049/2001 provides that ‘[t]he institutions shall refuse access to a document where disclosure would undermine the protection of commercial interests of a natural or legal person, including intellectual property, [...] unless there is an overriding public interest in disclosure’.

The redacted parts of documents (1.1.2) and (1.1.4), as per consultation with the IOM from which they originate, contain confidential and sensitive information. Their release would jeopardize IOM’s advantage in terms of cost-effectiveness, know-how (part of intellectual property) and efficiency over other entities implementing or aiming to implement similar projects worldwide. Additionally, as the financial reports identified were not designed for external communications purposes, it might lead to misunderstandings and/or misrepresentations regarding the nature of EU-funded activities implemented by IOM in the Horn of Africa. Disclosure of this information poses a real risk to affect IOM’s future activities and project opportunities in a manner that is reasonably expected to reduce IOM’s capacity to effectively and humanly implement its mandate.

The redacted parts of documents (1.2.1), (1.2.1.2), (1.2.2), (1.2.3), (1.2.3.1), (1.2.4), (1.2.4.2), (1.2.4.3), (1.2.5), (1.2.5.5), (1.2.6), (1.2.6.5), (1.2.6.6), (1.2.6.7), (1.2.6.8) and (1.2.7) as per Annex A contain information carrying commercial and competitive value, including on the organizations part

³ Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC, OJ L 295, 21.11.2018, p. 39.

of consortium and those subcontracted under the project, as well as of projects other than T05-EUTF-HOA-ET-51. That is to say, the documents contain: indication of payments for services, strategy in managing the dialogue with beneficiary authorities, affiliated entities and other partners, provision of training, identification of potential suppliers, provision of grants to partners from the EU and from other organizations, possible procurement plans of these organizations, names and logos of organisations that would disclose information on the subcontracted/granted entities, as well as additional competitive information including commercial and business risks, issues with businesses and technical explanation of business models, technical project design and provision (purchase) of material.

In addition, the redacted parts of documents (1.2.1.2), (1.2.4.2), (1.2.4.3), (1.2.5.5) describe in detail the organizational procedures and strategy of some implementing partners, members of the consortium and subcontractors, as well as that of other project stakeholders (business owners) located in refugee camps, including information on business strategies, costs, purchases, commercial activities, number of staff, payments, monthly expenses, prices charged to consumers for selling electricity, prices paid from consumers (and other information that could reveal the specific owners/generators from which they are supplied with energy), number of customers, specific description and characteristics of their businesses, in addition to names and other private information of the business owners, methods to collect payments, and other data that could affect their competitive positions and would undermine the protection of the relevant businesses' expertise and commercial strength. Additional parts that have been redacted also includes additional information carrying commercial and competitive value, such as data on down payments, interests, and payments for services.

The redacted parts of document (3.4.2) include information on financial commitments, contributions and payments to a number of organizations at a specific moment in time (September 2016). Disclosing these financial aspects of project implementation could pose a reputational risk for the implementing partner.

Other documents that are partially disclosed according to Article 4(2), first indent of Regulation 1049/2001 include documents (1.2.1.3), (1.2.1.5), (1.2.1.6), (1.2.5.6), and (1.2.7.4) as per Annex A. Parts of these documents contain commercially sensitive information related to the business agreements across beneficiaries, implementing partners and other affiliated entities, and with the Regional Bureaus of the Federal Democratic Republic of Ethiopia, including specific commitments amongst the parties. They also include information on subcontractors and their specific expertise and strategy. Disclosure, to the general public, of such information would undermine the protection of the relevant implementing partner's expertise and commercial strength.

More specifically, documents (1.2.1.3), (1.2.5.6), (1.2.1.5), (1.2.1.6), and (1.2.7.4) as per Annex A include the contractual terms of the agreement between the implementing partners and sub-grantees, including specific information relating to financial, operational and technical aspects of the implementation of the project. This information also includes the description of the tasks carried out in the framework of the subcontracting, as well as detailed information of the costs of the project, broken down to various categories and the financial breakdown of the actual costs incurred by the project partners. In addition, documents (1.2.1.5) and (1.2.1.6) report the contractual principles that are applied by AECID with its partners, and its disclosure poses the risk of undermining the interests of AECID when undertaking future contracting with other entities/organizations, outside of this specific project.

Document (1.2.7.10) compiles the main results of the strategic planning meetings between implementing-collaborating partners and other collaborating organizations. This includes references to the specific methodology proposed by the implementing partners used to prepare and to carry out the activities; information on the internal organisation, know-how, strategy and approach of the project implementation. The document also contains references to supplies and services sub-contracted with third parties; details on the work relations and practices of exchange of information and documents between the project staff.

Public disclosure of the parts of the above-mentioned document, through their release under Regulation (EC) No 1049/2001, would clearly undermine the interests of implementing organizations, beneficiaries, affiliated entities and private businesses collaborating with the Alianza Shire, as it would reveal to the public their internal information concerning budgetary, practical and organisational aspects thereby undermining their future competitive position. That information constitutes specific know-how of the organisations, on which they may build their experience in participation in similar kind of operations in the future. Public disclosure of the information in question would also undermine the interests of the economic operators that were involved in the projects in question in the capacity of external experts, providers or subcontractors. Given the competitive value of the information described above, disclosure of the withheld parts of the aforementioned documents would undermine the protection of the interests of the implementing partners that submitted it, as putting this information in the public domain would affect their future competitive position⁴.

As a consequence, there is a real and non-hypothetical risk that public access to the above-mentioned information would undermine the commercial interests, including intellectual property, of the implementing partner. We conclude, therefore, that the refusal of access to the withheld parts of documents listed above is made on the basis of the exception laid down in the first indent of Article 4(2) (protection of commercial interests, including intellectual property) of Regulation (EC) No 1049/2001.

2.2.3 Protection of international relations

Article 4(1)(a), third indent of Regulation (EC) No 1049/2001 provides that the institutions shall refuse access to a document where disclosure would undermine the protection of the public interest as regards (...) international relations.

As far as the protection of international relations is concerned, the EU Court has acknowledged that the institutions enjoy a wide discretion when considering whether access to a document may undermine that public interest⁵. In addition, the General Court has acknowledged that the way in

⁴ The exception relating to commercial interests can also be applied to non-commercial entities. Judgment of 21 October 2010, *Kalliope Agapiou Joséphidès v European Commission and Education, Audiovisual and Culture Executive Agency (EACEA)*, T-439/08, ECLI:EU:T:2010:442, paragraphs 127-128.

⁵ Judgment of the Court of First Instance of 25 April 2007, in case T-264/04, *WWF European Policy Programme v Council*, EU:T:2007:114, paragraph 40.

which the authorities of a third country perceive the decisions of the European Union is a component of the relations established with that third country⁶.

After careful assessment, we have concluded that parts of documents (1.2.3.1) and (1.2.4.3) as listed in Annex A cannot be released, as their disclosure would undermine the relations between the EU and Ethiopia, with regards to positions taken on the implementation of the project on the sovereign territory of the latter. Public disclosure would thereby negatively affect the EU's international relations with this partner country and undermine the implementation of the project and the EU's interests in the area.

Parts of the documents (5.1) and (5.2) as listed in Annex A contain information regarding the positions and views of individual Member States as part of a discussion concerning EU-funded projects. These positions and views have been anonymised by redacting the names of the Member States as disclosure to the public at large could be negatively received and construed by the partner country. Disclosure of non-anonymised positions and views would harm the relations between the EU and the EU Member States.

Parts of the documents (1.1.1) and (1.1.3) as listed in Annex A, as per the consultation with the IOM from which they originate, contain information regarding the involvement of specific staff, beneficiaries and partner organisations in the EU-IOM Initiative, which could risk their work in the country given the extremely sensitive context of Somalia. Disclosure of the information would harm the relations between these organisations and the Somali government and undermine the implementation of project and the organizations' interests in the area. In addition, the redacted parts of the documents also include challenges, mitigation measures and IOM engagement with government actors, recognitions of areas/territories which remain confidential due to risks they pose to the international relations between the EU / IOM (as they could lead to misunderstandings and/or misrepresentations regarding the nature of EU-funded activities implemented by IOM in the Horn of Africa) and the authorities from the Horn of Africa.

In the light of the above, I conclude that, there is a reasonable and concrete risk that public disclosure of the relevant undisclosed parts of the documents concerned is likely to harm the interest protected by Article 4(1)(a), third indent, of Regulation (EC) No 1049/2001.

2.2.4 Protection of the public interest as regards public security

Article 4(1)(a), first indent of Regulation (EC) No 1049/2001 provides that '[t]he institutions shall refuse access to a document where disclosure would undermine the protection of the public interest as regards (...) public security'.

Parts of documents (1.1.1) and (1.1.3) as listed in Annex A, as per the consultation with the IOM from which they originate, include information on actors (IOM's staff, beneficiaries, affiliated entities, contractors and partners) operating in Somalia in the context of the EU-IOM Initiative. The release of this information could pose risks (including considerable security risks) for IOM's partner organisations, which could be targeted because of their involvement in the EU-IOM Initiative, in particular in the extremely sensitive context of Somalia. It would also pose risks for the target

⁶ Judgment of the General Court of 27 February 2018, in case T-307/16, CEE Bankwatch Network v. European Commission, ECLI:EU:T:2018:97, paragraphs 89 –90

groups, consisting mostly of vulnerable migrants, including unaccompanied migrant children, and for IOM staff and partners as it contains references to specific sites and locations, which could pose security concerns and risk of targeting for the individuals should this information be disclosed.

Parts of documents (1.2.1.2), (1.2.2), (1.2.3.1), (1.2.4.3), (1.2.5), (1.2.5.5), (1.2.6), (1.2.6.7) as per Annex A have been redacted from the document as they include information on the specific ethnicities, tribes and language groups of people living in the refugee camps, including vulnerable migrants and unaccompanied minors, as well as their numbers. The document also contains the specific name, images of maps and geo-localization of a number of houses, stores and small businesses within the refugee camps, including information on where unaccompanied minors live. In addition, document (1.2.5), (1.2.6) and (1.2.6.7) as per Annex A also contains information on a workshops attended by refugees, and contains sensitive information on some vulnerable areas of the camps in which the project takes place.

This type of sensitive information would hinder the public security of the refugee population living in the vulnerable areas of the camp, and would make the very individuals and/or groups targeted by these initiatives more vulnerable.

Public access, at this stage, would therefore undermine the public interest as regards public security of the refugee population targeted by the abovementioned project, as it would expose specific details about the location of vulnerable areas of the refugee camps which would allow targeting of individuals, including vulnerable people and unaccompanied minors refugees.

Consequently, there is a real and non-hypothetical risk that public access to the above-mentioned information would undermine the public security of a vulnerable part of the population living in the refugee camps where the project is implemented. It is therefore concluded that the refusal of access, at this stage, to the parts of the documents mentioned above concerning public interest and public security-related details of the proposed action is justified on the basis of Article 4(1)(a), first indent of Regulation 1049/2001.

2.3. DOCUMENTS NOT DISCLOSED

We regret to inform you that your application cannot be granted for a number of documents as disclosure is prevented by exceptions to the right of access laid down in Article 4 of Regulation (EC) No 1049/2001.

The detailed reasons for non disclosure of documents are set out below.

2.3.1 Protection of privacy and the integrity of the individual

Article 4(1)(b) of Regulation 1049/2001 provides that ‘access to documents is refused where 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.’

Document (1.2.1.8) as per Annex A contains information relating to an identified or identifiable natural person, such as images of natural persons. Disclosure of the identified document 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.

The same provisions of the Data Protection Regulation is mentioned in section 2.2.1 of this letter apply.

In your request, you do not express any particular interest to have access to 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.

2.3.2 Protection of the public interest as regards public security

Article 4(1)(a), first indent of Regulation 1049/2001 provides that '[t]he institutions shall refuse access to a document where disclosure would undermine the protection of the public interest as regards (...) public security'.

Having examined some of the Annexes to the different Progress reports produced by the Alianza Shire (Documents 1.2.3.2, 1.2.5.7 and 1.2.6.3), and after consultation with the third party from which they originate, under the provisions of Regulation (EC) No 1049/2001 regarding public access to documents, we have come to the conclusion that shall not be disclosed in line with (Article 4(6) of Regulation 2001/1049).

Document (1.2.3.2), (1.2.5.7) and (1.2.6.3) as per Annex A contain sensitive information on some vulnerable areas of the camps in which the refugee population lives. Particularly, document (1.2.5.7) and (1.2.6.3), to which you request access, as per consultation with Alianza Shire from which they originate, relate to a workshops attended by refugees, and contain sensitive information on some vulnerable areas of the camps in which the project takes place. Their disclosure would also pose risks for the target groups, consisting mostly of vulnerable migrants, including migrant women and minors, as it contains references to specific sites and locations, which could pose security concerns and risk of targeting for the individuals should this information be disclosed.

This type of sensitive information would hinder the public security of the refugee population living in the vulnerable areas of the camp, and would make the very individuals and/or groups targeted by these initiatives more vulnerable.

Public access, at this stage, would therefore undermine the public interest as regards public security of the refugee population targeted by the abovementioned project, as it would expose specific details about the location of vulnerable areas of the refugee camps.

Consequently, there is a real and non-hypothetical risk that public access to the above-mentioned documents would undermine the public security of a vulnerable part of the population living in the refugee camps where the project is implemented. It is therefore concluded that the refusal of access, at this stage, to the documents mentioned above concerning public interest and public security-related details of the proposed action is justified on the basis of Article 4(1)(a), first indent of Regulation 1049/2001.

2.4. NO OVERRIDING PUBLIC INTEREST IN DISCLOSURE

The exception laid down in Article 4(2) first indent of Regulation 1049/2001 must be waived if there is an overriding public interest in disclosure. Such an interest must, firstly, be public and, secondly, outweigh the harm caused by disclosure.

In your application, you do not put forward any reasoning pointing to an overriding public interest in disclosing the documents requested.

Nor have we been able to identify any public interest capable of overriding the interests protected by Article 4(2), first indent, of Regulation 1049/2001.

We conclude, therefore, that the protection of commercial interests prevails.

Please note also that Article 4(1)(a) first indent and 4(1)(b) of Regulation 1049/2001 have an absolute character and do not include the possibility to demonstrate the existence of an overriding public interest.

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

Yours sincerely,

(e-signed)

Koen Doens

Enclosures: Annex A: List of documents
80 Documents fully or partially disclosed