



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL  
CLIMATE ACTION

The Director-General

Brussels  
CLIMA.DG01

By registered letter with acknowledgment  
of receipt

Belen Balanya,  
Corporate Europe Observatory  
Rue d'Edimbourg 26,  
1050 Brussels  
Belgium

Advance copy by email: ask+request-  
7715-2f91f223@asktheeu.org

Dear Ms Balanya,

We refer to your e-mail dated 28 February 2020 in which you make a request for access to documents, registered on the 2 March 2020 under the above-mentioned reference number.

You request access to:

- i) *“All correspondence (including email) between 29 June 2019 and 27 February 2020 between former/current Commissioners and/or his/her cabinet and/or officials and representatives of DG CLIMA on one hand and representatives from Eurogas, GasNaturally, the International Association of Oil & Gas Producers (IOGP), Gas Infrastructure Europe (GIE), Marcogaz, IFIEC Europe, ENTSOG, ENTSOE, Eurelectric, Business Europe, CEFIC, Hydrogen Europe, Gas for Climate, Bioenergy Europe, European Biogas Association, National Grid, Open Grid Europe, Enagas, Gasunie, GRTgaz/GRDF/Engie, Terega, Statoil/Equinor, ExxonMobil, Shell, BP, Enagas, Snam, Fluxys, Gazprom, Weber Shandwick, Gplus, Fleishman-Hillard and/or FTI Consulting on the other, in which the gas market reform or the TEN-E regulation was addressed.*
- ii) *List of meetings between between 29 June 2019 and 27 February 2020 between officials and representatives of DG CLIMA on one hand and representatives from Eurogas, GasNaturally, the International Association of*

*Oil & Gas Producers (IOGP), Gas Infrastructure Europe (GIE), Marcogaz, IFIEC Europe, ENTSOG, ENTSOE, Eurelectric, Business Europe, CEFIC, Hydrogen Europe, Gas for Climate, Bioenergy Europe, European Biogas Association, National Grid, Open Grid Europe, Enagas, Gasunie, GRTgaz/GRDF/Engie, Terega, Statoil/Equinor, ExxonMobil, Shell, BP, Enagas, Snam, Fluxys, Gazprom, Weber Shandwick, Gplus, Fleishman-Hillard and/or FTI Consulting on the other, in which the gas market reform or the TEN-E regulation was addressed.*

iii) *Minutes of the meetings mentioned above”*

Your application concerns the following documents:

	Author	Date	Reference
1	WindEurope	26 February 2020	Ares(2020)1208467
2	WindEurope	26 February 2020	Ares(2020)1208467
3	Eurogas	13 December 2019	Ares(2019)7680671
4	Eurogas	13 December 2019	Ares(2019)7680671
5	Eurogas	11 February 2020	Ares(2020)889498
6	Eurogas	11 February 2020	Ares(2020)889498
7	Gas Infrastructure Europe	7 February 2020	Ares(2020)807174
8	IOGP	10 March 2020	Ares(2020)1472166
9	IOGP	10 March 2020	Ares(2020)1472166
10	Hydrogen Europe	26 February 2020	Ares(2020)1201547
11	Hydrogen Europe	26 February 2020	Ares(2020)1201547
12	European Commission/Equinor/NHO	5 March 2020	Ares(2020)1382261
13	Equinor/NHO	29 January 2020	Ares(2020)557814
14	European Commission/IOGP	2 December 2019	Ares(2020)1596539
15	European Commission/GD4S	16 March 2020	Ares(2020)1596482
16	GRDF	16 March 2020	Ares(2020)1596482
17	GRTgaz	4 October 2019	Ares(2020)1596592

18	European Commission	24 July 2019	Ares(2019)4822204
19	Eurogas	22 July 2019	Ares(2019)4743081
20	European Commission	3 February 2020	Ares(2020)652654
21	GRDF	16 March 2020	Ares(2020)1596482
22	Eurogas	6 February 2020	Ares(2020)2272137

Please note that the Commission has received some of the identified documents from third parties. In accordance with Article 4(4) of Regulation (EC) 1049/2001, DG CLIMA has consulted those third parties concerning the disclosure of the requested documents emanating from them.

Please find the identified documents enclosed with this letter. However, I regret to inform you that I cannot give you access to document 14 and some parts of the documents 1, 3-8, 10-13 and 15-22.

A complete disclosure of the above-mentioned 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: names and contact information of Commission staff members not pertaining to the senior management; names and contact details of other natural persons and other information relating to an identified or identifiable natural person.

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.

As regards document 14, in the course of the third party consultation, the third party opposed to the disclosure of document 14 based on Article 4, paragraphs 1 (b) of Regulation 1049/2001, namely the privacy and the integrity of the individual, in particular in accordance with Community legislation regarding the protection of personal data. The third party argues that the document does not include any substantial policy document but some “personal” exchanges of emails. Therefore, pursuant to Article 4(1)(b) of Regulation (EC) No 1049/2001, access cannot be granted to this document.

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)

Yours sincerely,

*(e-signed)*

Mauro PETRICCIONE