



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR ENERGY

Directorate C - Green Transition and Energy System Integration
C.2 - Decarbonisation and Sustainability of Energy Sources

Brussels, 22.08.2024
ENER C.2/AD/svh(2024)6750213

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

Subject: Your application for access to documents – EASE 2024/3763

Dear Ms Balanya,

I refer to your request for access to Commission documents registered on 13 July 2024 under case number 2024/3763.

Identification and assessment of the relevant documents:

Your application concerns the following documents that fall under the category:

“Correspondence relating to the Industrial Carbon Management Strategy (ICMS) between 1 Sept 2023 and 6 February 2024, with the International Association of Oil & Gas Producers (IOGP), Zero Emissions Platform (ZEP), Bellona, the Florence School of Regulation, the Clean Air Task Force (CATF), Progressive Energy, Wintershall Dea, European Roundtable on Climate Change and Sustainable Transition (ERCST), ENTSOG, Snam, Equinor, Eni, TotalEnergies and/or Shell,

Records, minutes or notes of meetings at which the ICMS was discussed between 1 Sept 2023 and 6 February 2024 with the International Association of Oil & Gas Producers (IOGP), Zero Emissions Platform (ZEP), Bellona, the Florence School of Regulation, the Clean Air Task Force (CATF), Progressive Energy, Wintershall Dea, European Roundtable on Climate Change and Sustainable Transition (ERCST), ENTSOG, Snam, Equinor, Eni, TotalEnergies and/or Shell.”

| | Title | ARES reference | Release | Reason under Regulation 1049/2001 |
|----|---|-------------------|---------|---|
| 1. | <ul style="list-style-type: none"> - email - CCUS Forum Working group report - Towards a European cross-border CO2 transport and storage infrastructure - An Interoperable CO2 Transport Network | Ares(2023)6340073 | YES | Article 4(1)(b) of Regulation (EC) 1049/2001 in conjunction with Article 9(1)(b) of Regulation (EU) 2018/1725 (for personal data) |
| 2. | <ul style="list-style-type: none"> - email - Final version paper from WG public perception - Public perception of CCUS | Ares(2023)6535859 | YES | Article 4(1)(b) of Regulation (EC) 1049/2001 in conjunction with Article 9(1)(b) of Regulation (EU) 2018/1725 (for personal data) |
| 3. | Partnership for CCUS – A start | Ares(2024)269938 | YES | N/A |
| 4. | <ul style="list-style-type: none"> - FW_ Invitation to speak at FSR webinar on CCS regulatory framework - FSR_PD_CCS_051224 | Ares(2024)5649608 | YES | Article 4(1)(b) of Regulation (EC) 1049/2001 in conjunction with Article 9(1)(b) of Regulation (EU) 2018/1725 (for personal data) |
| 5. | Wintershall DEA. Fw_ Urgent_ Standardisation - call tomorrow | Ares(2024)5651922 | YES | Article 4(1)(b) of Regulation (EC) 1049/2001 in conjunction with Article 9(1)(b) of Regulation (EU) 2018/1725 (for personal data) |
| 6. | <ul style="list-style-type: none"> - Fw_ invitation to join potential EU SEW session on CCS - Anthemis Project event- invite | Ares(2024)5697138 | YES | Article 4(1)(b) of Regulation (EC) 1049/2001 in conjunction with Article 9(1)(b) of Regulation (EU) 2018/1725 (for personal data) |

| | | | | |
|-----|--|-------------------|-----|---|
| 7. | Ares(2024)5714517Re_ Info on strategy | Ares(2024)5714517 | YES | Article 4(1)(b) of Regulation (EC) 1049/2001 in conjunction with Article 9(1)(b) of Regulation (EU) 2018/1725 (for personal data) |
| 8. | <ul style="list-style-type: none"> - Ares(2024)5714606Re_ Info on strategy - Re_ Info on strategy attachment : 20240118 CRCF trilogues and CCUS strategy | Ares(2024)5714606 | YES | Article 4(1)(b) of Regulation (EC) 1049/2001 in conjunction with Article 9(1)(b) of Regulation (EU) 2018/1725 (for personal data) |
| 9. | <ul style="list-style-type: none"> - IOGP_FW_FSR Policy Webinar Jan 17 on CCS - annex_IOGP Europe considerations regarding EU Industrial Carbon Management Strategy | Ares(2024)5843286 | YES | Article 4(1)(b) of Regulation (EC) 1049/2001 in conjunction with Article 9(1)(b) of Regulation (EU) 2018/1725 (for personal data) |
| 10. | Shell_RE_ Meeting request - CCS in Europe | Ares(2024)5843706 | YES | Article 4(1)(b) of Regulation (EC) 1049/2001 in conjunction with Article 9(1)(b) of Regulation (EU) 2018/1725 (for personal data) |
| 11. | <ul style="list-style-type: none"> - email - Letter calling for initiatives to promote a market for low carbon products - Joint letter to the EC - call for low-carbon products strategy in ICMS | Ares(2025)766061 | YES | Article 4(1)(b) of Regulation (EC) 1049/2001 in conjunction with Article 9(1)(b) of Regulation (EU) 2018/1725 (for personal data) |
| 12. | RE_ [Placeholder] ZEP Policy & Economics Committee | Ares(2024)5649086 | YES | Article 4(1)(b) of Regulation (EC) 1049/2001 in conjunction with Article 9(1)(b) of Regulation (EU) 2018/1725 (for personal data) |

| | | | | |
|-----|--|-------------------|-----|---|
| 13. | <ul style="list-style-type: none"> - FW_CCSA_ZEP report on CO2 transport by ship - Final report on CO2 transport by ship | Ares(2024)5649086 | YES | Article 4(1)(b) of Regulation (EC) 1049/2001 in conjunction with Article 9(1)(b) of Regulation (EU) 2018/1725 (for personal data) |
| 14. | RE_ ICM Knowledge Sharing Network - ZEP Projects Network | Ares(2024)5649086 | YES | Article 4(1)(b) of Regulation (EC) 1049/2001 in conjunction with Article 9(1)(b) of Regulation (EU) 2018/1725 (for personal data) |

With regard to the majority of the documents listed above, a complete disclosure 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 Regulation¹ 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, we conclude that, pursuant to Article 4(1)(b) of Regulation (EC) 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.

Please note that documents originating from third parties are disclosed to you based on Regulation (EC) No 1049/2001. However, this disclosure is without prejudice to the rules on intellectual property, which may limit your right to reproduce or exploit the released document/documents without the agreement of the originator, who may hold an

¹ 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.

intellectual property right on them. The European Commission does not assume any responsibility from their reuse.

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 Brussels

or by email to: sg-acc-doc@ec.europa.eu

Yours sincerely,

Kitti NYITRAI