



EUROPEAN COMMISSION

Brussels, 25.7.2023

C(2023) 5173 final

Ms Laura Kayali

Politico

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Belgium

**DECISION OF THE EUROPEAN COMMISSION PURSUANT TO ARTICLE 4 OF THE
IMPLEMENTING RULES TO REGULATION (EC) NO 1049/2001¹**

**Subject: Your confirmatory application for access to documents under
Regulation (EC) No 1049/2001 – EASE 2022/5604**

Dear Ms Kayali,

I refer to your email of 25 October 2022, registered on 26 October 2022, by which you submitted a confirmatory application in accordance with Article 7(2) of Regulation (EC) No 1049/2001 regarding public access to European Parliament, Council and Commission documents² (hereafter ‘Regulation (EC) No 1049/2001’).

Please accept our apologies for the delay in replying to your request.

1. SCOPE OF YOUR REQUEST

In your initial application of 29 September 2022, you requested access to, I quote: ‘[...] documents, briefings, minutes and any other relevant documentation about the meeting held on September 27, 2022 between EU Home Affairs Commissioner Ylva Johansson and France’s Charlotte Caubel.’

The European Commission identified the following documents as falling under the scope of your request:

¹ OJ L 345, 29.12.2001, p. 94.

² OJ L 145, 31.5.2001, p. 43.

- Flash report - meeting between Ylva Johansson and Charlotte Caubel, 17 September 2022, registered under reference number Ares(2022)7167352 (hereafter ‘document 1’);
- Briefing for a meeting between Ylva Johansson and Charlotte Caubel, 27 September 2022, registered under reference number Ares(2022)7166807 (hereafter ‘document 2’).

In its initial reply of 25 October 2022, the Directorate-General for Migration and Home Affairs:

- Granted wide partial access to document 1, with the exception of some parts that were redacted based on the exception of Article 4(1)(b) (protection of privacy and the integrity of the individual) of Regulation (EC) No 1049/2001;
- Granted partial access to document 2, with the exception of some parts that were redacted based on the exceptions of Article 4(1)(b) (protection of privacy and the integrity of the individual) and the first subparagraph of Article 4(3) (protection of the decision-making process) of Regulation (EC) No 1049/2001.

In your confirmatory application, you request a review of this position regarding document 2. You underpin your request with arguments, which I will address in the corresponding sections below.

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

When assessing a confirmatory application for access to documents submitted pursuant to Regulation (EC) No 1049/2001, the Secretariat-General conducts a review of the reply given by the Directorate-General concerned at the initial stage.

Following this review, I regret to inform you that I have to confirm the initial decision of the Directorate-General for Migration and Home Affairs to grant partial access to document 2 based on the exceptions of the first indent of Article 4(1)(a) (protection of the public interest as regards public security), Article 4(1)(b) (protection of privacy and the integrity of the individual) and the first subparagraph of Article 4(3) (protection of the decision-making process) of Regulation (EC) No 1049/2001, for the reasons set out below.

2.1. Protection of the public interest as regards public security and of the decision-making process

The first indent of Article 4(1)(a) 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’*.

The first subparagraph of Article 4(3) of Regulation (EC) No 1049/2001 provides that *‘[a]ccess to a document, drawn up by an institution for internal use or received by an institution, which relates to a matter where the decision has not been taken by the institution, shall be refused if disclosure of the document would seriously undermine the*

institution's decision-making process, unless there is an overriding public interest in disclosure'.

In accordance with the case-law of the Court of Justice, *'a European Union institution may take into account cumulatively more than one of the grounds for refusal set out in Article 4 of Regulation No 1049/2001 when assessing a request for access to documents held by it'*³. In the present case, the exceptions relating to the protection of the public interest as regards public security and of the decision-making process are closely connected.

As far as the interests protected by virtue of Article 4(1)(a) of Regulation (EC) No 1049/2001 are concerned, the Court of Justice has confirmed that it *'is clear from the wording of Article 4(1)(a) [of Regulation (EC) No 1049/2001] that, as regards the exceptions to the right of access provided for by that provision, refusal of access by the institution is mandatory where disclosure of a document to the public would undermine the interests which that provision protects, without the need, in such a case and in contrast to the provisions, in particular, of Article 4(2), to balance the requirements connected to the protection of those interests against those which stem from other interests'*⁴.

The Court of Justice stressed in the *In 't Veld* ruling that the institutions *'must be recognised as enjoying a wide discretion for the purpose of determining whether the disclosure of documents relating to the fields covered by [the exceptions provided for in Article 4(1)(a) of Regulation 1049/2001] could undermine the public interest'*⁵.

Consequently, *'the Court's review of the legality of the institutions' decisions refusing access to documents on the basis of the mandatory exception [...] relating to the public interest must be limited to verifying whether the procedural rules and the duty to state reasons have been complied with, the facts have been accurately stated, and whether there has been a manifest error of assessment of the facts or a misuse of powers'*⁶.

Moreover, the General Court ruled that, as regards the interests protected by the above-mentioned Article, *'[...] it must be accepted that the particularly sensitive and fundamental nature of those interests, combined with the fact that access must, under that provision, be refused by the institution if disclosure of a document to the public would undermine those interests, confers on the decision which must thus be adopted by the institution a complexity and delicacy that call for the exercise of particular care.*

³ Judgment of the General Court of 13 September 2013, *Netherlands v Commission*, T-380/08, EU:T:2013:480, paragraphs 26 and 34.

⁴ Judgement of the Court of Justice of 1 February 2007, *Sison v Council*, C-266/05 P, EU:C:2007:75, paragraph 46.

⁵ Judgment of the Court of Justice of 3 July 2014, *Council v In 't Veld*, C-350/12, EU:C:2014:2039, paragraph 63.

⁶ Judgment of the General Court of 25 April 2007, *WWF European Policy Programme v Council*, T-264/04, EU:T:2007:114, paragraph 40.

*Such a decision requires, therefore, a margin of appreciation*⁷. This was further confirmed by the Court of Justice⁸.

Document 2 constitutes a briefing for Commissioner Ylva Johansson ahead of her meeting with Charlotte Caubel, French State Secretary for Children and Families. It was drafted by the European Commission in the context of the implementation of the EU strategy to fight child sexual abuse⁹, in particular in the context of the Proposal for a Regulation of the European Parliament and of the Council laying down rules to prevent and combat child sexual abuse¹⁰ (hereafter ‘the Proposal’). The Secretariat-General notes that the European Commission adopted the Proposal on 11 May 2022 and that discussions within the Council or its preparatory bodies on this proposal are currently fully ongoing¹¹.

Child sexual abuse is a heinous crime that has serious life-long consequences for victims. Due to the rapid expansion of the digital world, this crime has become truly global. Child sexual abuse often goes undetected, as children are abused by perpetrators within their closest circle of trust, undercutting their basic confidence in those who are charged with protecting and supporting them. When the abuse is also recorded and shared online, the violation continues as long as perpetrators share these images and videos online, often for years. Victims have to live with the knowledge that the images and videos of the crimes showing the worst moments of their lives are being circulated and anyone, including friends or relatives, may see them.

Prevention and combating child sexual abuse therefore undoubtedly qualifies as public security in the meaning of the first indent of Article 4(1)(a) of Regulation (EC) No 1049/2001.

The part concerned of document 2 contains information and views on applicability of specific provisions of the Proposal aimed at preventing, detecting, and combating child sexual abuse. These sensitive issues were discussed during the meeting held between Commissioner Johansson and French State Secretary Caubel on 27 September 2022.

The Secretariat-General considers that disclosure of the respective part of document 2 would undermine the protection of public security to the extent that it reveals preliminary and sensitive information on applicability of specific provisions of the Proposal. Therefore, the legal details discussed during the meeting and reflected in the respective part of the document requested are of a highly sensitive nature and, if disclosed, could serve to inform perpetrators of specific legal provisions under consideration regarding prevention and combating child sexual abuse material. In other words, the Secretariat-

⁷ Judgment of the General Court of 11 July 2018, *ClientEarth v European Commission*, T-644/16, EU:T:2018:429, paragraph 23.

⁸ Judgment of the Court of Justice of 19 March 2020, *ClientEarth v European Commission*, C-612/18 P, EU:C:2020:223, paragraphs 68 and 83.

⁹ https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12433-EU-strategy-to-fight-child-sexual-abuse_en

¹⁰ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2022%3A209%3AFIN&qid=1652451192472>

¹¹ <https://eur-lex.europa.eu/legal-content/EN/HIS/?uri=COM:2022:209:FIN>

General takes the view that disclosing the withheld part of document 2 would create a situation in which public security would be negatively affected.

In themselves, the explanations above allow understanding why access to the withheld part of the document requested has to be refused. The institution, when dealing with a request for disclosure of certain information, is not required, in the statement of reasons for the confirmatory decision, to reveal information the effect of which would be, if that information were disclosed, to undermine the public interest covered by the exception relied on by that institution¹².

The General Court confirmed in Case T-31/18 that, *'[i]f such an obligation existed, the institution [...], by providing those explanations on the use which may be made of the requested information, would itself create a situation in which, by its conduct, the public security which it is tasked with protecting, among other things, would be endangered'*¹³.

In the present case, the information at stake is of a sufficient level of detail and accordingly there is a reasonably foreseeable and not purely hypothetical risk that disclosure of the withheld part of the document concerned would undermine the protection of the public interest as regards public security.

Furthermore, document 2 was drawn up for internal use by the relevant services of the European Commission. The withheld part contains preliminary and sensitive information on the position of the French authorities on applicability of specific provisions of the Proposal and solely reflects the Commission's interpretation of the political positions outlined therein. The Secretariat-General notes that these positions, raised to the Commission by the French authorities, have not been made public. This section also outlines the position to be taken by the Commission in political discussions within the Council.

Having conducted an assessment of the information contained in the document requested, the Secretariat-General considers that the withheld part of document 2 cannot be clearly dissociated from the ongoing negotiations on the Proposal within the Council.

The disclosure of the withheld part of document 2 would compromise the position of the Member States and of the Commission in the ongoing decision-making process insofar as it would reveal the detailed positions of France and of the Commission on the specific provisions of the Proposal, while no similar obligation would be imposed on the other Member States. The integrity of the ongoing legislative deliberations would thus be seriously undermined.

Therefore, disclosure of the withheld part of document 2 would, at this stage, jeopardise the decision-making process in the meaning of the first subparagraph of Article 4(3) of Regulation (EC) No 1049/2001. It could affect the exploration of different policy options

¹² Judgment of the General Court of 7 February 2018, *Access Info Europe v Commission*, T-852/16, EU:T:2018:71, paragraph 114.

¹³ Judgment of the General Court of 27 November 2019, *Luisa Izuzquiza and Arne Semsrott v European Border and Coast Guard Agency*, T-31/18, EU:T:2019:815, paragraph 113.

for the future. Premature sharing of isolated pieces of information, with little context, would also serve to distort the picture, rather than giving them a full overview with all relevant information. The risk is real and non-hypothetical given the specific and sensitive nature of the Proposal in question.

Please note that it is not possible to give more detailed reasons justifying the need for confidentiality without disclosing the document concerned and, thereby, depriving the exception of its very purpose¹⁴.

The Secretariat-General would like to recall that documents disclosed under Regulation (EC) No 1049/2001 are disclosed to the public at large ('erga omnes') and not only to the applicant who originally requested access.

In your confirmatory application, you state, I quote: *'I respectfully disagree with your assessment regarding the protection of the ongoing decision-making process and would please ask the European Commission to disclose the briefing (document 2) without the redacted parts. [...] the position of another member state, ie Germany, is very much public (see here [https://urldefense.com/v3/https://www.politico.eu/article/germany-;!!DOxrgLBm!Dqws79xuncFulxg4AwXr3oe9ut87Ep5iFCzhkwWzLx7gmCVNtXwRUsGXXRibwWf_4yZOOHqVgBPmeRmYOVHWbRJ4mSyWriYz55Hj\\$](https://urldefense.com/v3/https://www.politico.eu/article/germany-;!!DOxrgLBm!Dqws79xuncFulxg4AwXr3oe9ut87Ep5iFCzhkwWzLx7gmCVNtXwRUsGXXRibwWf_4yZOOHqVgBPmeRmYOVHWbRJ4mSyWriYz55Hj$) ...) which has not jeopardized the ongoing decision-making process – on the contrary, it's part of democracy.'*

In relation to the above, the mere fact that other Member State has voluntarily made its political positions on specific provisions of the Proposal public is irrelevant.

Furthermore, in your confirmatory application, you state, I quote: *'The court of justice of the EU itself does not seem to think that what are designed to be closed-door meetings should remain under closed doors (see here [https://urldefense.com/v3/https://www.euractiv.fr/section/justice-;!!DOxrgLBm!Dqws79xuncFulxg4AwXr3oe9ut87Ep5iFCzhkwWzLx7gmCVNtXwRUsGXXRibwWf_4yZOOHqVgBPmeRmYOVHWbRJ4mSyWrvRvZARI\\$](https://urldefense.com/v3/https://www.euractiv.fr/section/justice-;!!DOxrgLBm!Dqws79xuncFulxg4AwXr3oe9ut87Ep5iFCzhkwWzLx7gmCVNtXwRUsGXXRibwWf_4yZOOHqVgBPmeRmYOVHWbRJ4mSyWrvRvZARI$) ...). The context is different but the philosophy behind the decision is the same.'*

Contrary to your claim, the Secretariat-General would like to point out that the General Court recognised in Case T-93/11 that the preparatory nature of certain documents permitted the inference that the documents were internal documents within the terms of Article 4(3) of Regulation (EC) No 1049/2001¹⁵.

Consequently, the Secretariat-General must conclude that the withheld part of document 2 must be protected under the exceptions laid down in the first indent of Article 4(1)(a) (protection of the public interest as regards public security) and the first subparagraph of

¹⁴ To that effect, see judgment of the General Court of 24 May 2011, *Navigazione Libera del Golfo Srl v Commission*, Joint Cases T-109/05 and T-444/05, EU:T:2011:235, paragraph 82; Judgment of the General Court of 8 February 2018, *Pagkyrios Organismos Ageladotrofon v Commission*, T-74/16, EU:T:2018:75, paragraph 71.

¹⁵ Judgment of the General Court of 7 June 2013, *Stichting Corporate Europe Observatory v European Commission*, T-93/11, EU:T:2013:308, paragraph 33.

Article 4(3) (protection of the decision-making process) of Regulation (EC) No 1049/2001.

2.2. Protection of privacy and the integrity of the individual

Article 4(1)(b) of Regulation (EC) No 1049/2001 provides that *'[t]he institutions shall refuse access to a document 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'*.

In its judgment in Case C-28/08 P (*Bavarian Lager*)¹⁶, the Court of Justice ruled that when a request is made for access to documents containing personal data, Regulation (EC) No 45/2001 of the European Parliament and of the Council of 18 December 2000 on the protection of individuals with regard to the processing of personal data by the Community institutions and bodies and on the free movement of such data¹⁷ (hereafter 'Regulation (EC) No 45/2001') becomes fully applicable.

In the above-mentioned judgment, the Court stated that Article 4(1)(b) of Regulation (EC) No 1049/2001 *'requires that any undermining of privacy and the integrity of the individual must always be examined and assessed in conformity with the legislation of the Union concerning the protection of personal data, and in particular with [...] [the Data Protection] Regulation'*¹⁸. Likewise, in the *Psara* judgment, the General Court added that Article 4(1)(b) *'establishes a specific and reinforced system of protection of a person whose personal data could, in certain cases, be communicated to the public [...]*¹⁹.

Please note that, as from 11 December 2018, Regulation (EC) No 45/2001 has been repealed by 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/EC²⁰ (hereafter 'Regulation (EU) 2018/1725').

However, the case-law issued with regard to Regulation (EC) No 45/2001 remains relevant for the interpretation of Regulation (EU) 2018/1725.

Article 3(1) of Regulation (EU) 2018/1725 provides that personal data *'means any information relating to an identified or identifiable natural person [...]*'.

¹⁶ Judgment of the Court of Justice of 29 June 2010, *European Commission v The Bavarian Lager Co. Ltd* (hereafter referred to as '*European Commission v The Bavarian Lager* judgment') C-28/08 P, EU:C:2010:378, paragraph 59.

¹⁷ OJ L 8, 12.1.2001, p. 1.

¹⁸ *European Commission v The Bavarian Lager* judgment, cited above, paragraph 59.

¹⁹ Judgment of the General Court of 25 September 2018, *Maria Psara and Others v European Parliament*, T-639/15 to T-666/15 and T-94/16, EU:T:2018:602, paragraph 65.

²⁰ OJ L 295, 21.11.2018, p. 39.

As the Court of Justice confirmed in Case C-465/00 (*Rechnungshof*), ‘there is no reason of principle to justify excluding activities of a professional [...] nature from the notion of private life’²¹.

Document 2 contains personal data such as names and functions of staff members of the European Commission who do not form part of the senior management and of persons external to the European Commission who are not public figures.

The names of the persons concerned as well as other data from which their identity can be deduced undoubtedly constitute personal data in the meaning of Article 3(1) of Regulation (EU) 2018/1725²².

Pursuant to Article 9(1)(b) of Regulation (EU) 2018/1725, personal data shall only be transmitted to recipients established in the Union other than Union institutions and bodies if ‘the 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 the processing constitutes lawful processing in accordance with the requirements of Article 5 of Regulation (EU) 2018/1725, can the transmission of personal data occur.

In Case C-615/13 P (*ClientEarth*), the Court of Justice ruled that the institution does not have to examine by itself the existence of a need for transferring personal data²³. This is also clear from Article 9(1)(b) of Regulation (EU) 2018/1725, which requires that the necessity to have the personal data transmitted must be established by the recipient.

According to Article 9(1)(b) of Regulation (EU) 2018/1725, the European Commission has to examine the further conditions for the lawful processing of personal data only if the first condition is fulfilled, namely if the recipient establishes that it is necessary to have the data transmitted for a specific purpose in the public interest. It is only in this case that the European Commission has to examine whether there is a reason to assume that the data subject’s legitimate interests might be prejudiced and, in the affirmative, establish the proportionality of the transmission of the personal data for that specific purpose after having demonstrably weighed the various competing interests.

In your confirmatory application, you do not put forward any arguments to establish the necessity to have the data transmitted for a specific purpose in the public interest. Therefore, the European Commission does not have to examine whether there is a reason to assume that the data subjects’ legitimate interests might be prejudiced.

²¹ Judgment of the Court of Justice of 20 May 2003, *Rechnungshof and Others v Österreichischer Rundfunk*, Joined Cases C-465/00, C-138/01 and C-139/01, EU:C:2003:294, paragraph 73.

²² *European Commission v The Bavarian Lager* judgment, cited above, paragraph 68.

²³ Judgment of the Court of Justice of 16 July 2015, *ClientEarth v European Food Safety Agency*, C-615/13 P, EU:C:2015:489, paragraph 47.

Notwithstanding the above, there are reasons to assume that the legitimate interests of the data subjects concerned would be prejudiced by the disclosure of the personal data reflected in the document, as there is a real and non-hypothetical risk that such public disclosure would harm their privacy and subject them to unsolicited external contacts.

Consequently, the Secretariat-General concludes 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 the disclosure of the personal data concerned.

3. OVERRIDING PUBLIC INTEREST IN DISCLOSURE

The exception laid down in the first subparagraph of Article 4(3) of Regulation (EC) No 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. It is for the applicant to put forward specific circumstances that show that there is an overriding public interest, which justifies the disclosure of the documents concerned²⁴.

According to the case-law, the applicant must, on the one hand, demonstrate the existence of a public interest likely to prevail over the reasons justifying the refusal of access to the documents concerned and, on the other hand, demonstrate precisely in what way disclosure of the documents would contribute to assuring protection of that public interest to the extent that the principle of transparency takes precedence over the protection of the interests that motivated the refusal²⁵.

As a preliminary remark, the Secretariat-General would like to underline that the European Commission has made significant efforts to increase the transparency of its work on fighting child sexual abuse²⁶.

In your confirmatory application, you state that, I quote: *‘The position of member states on legislation that will affect 450 million people is of utter public interest, especially when said legislation has proven controversial and is meeting opposition from digital rights NGOs and MEPs [...]’*.

²⁴ See e.g. judgment of the General Court of 5 December 2018 in Case T-312/17, *Campbell v Commission*, EU:T:2018:876, paragraph 58.

²⁵ Judgment of the General Court of 9 October 2018, *Anikó Pint v European Commission*, T-634/17, EU:T:2018:662, paragraph 48; Judgment of the General Court of 23 January 2017, *Association Justice & Environment, z.s v European Commission*, EU:T:2017:18, paragraph 53; Judgment of the General Court of 5 December 2018, *Falcon Technologies International LLC v European Commission*, T-875/16, EU:T:2018:877, paragraph 84.

²⁶ https://ec.europa.eu/home-affairs/policies/internal-security/child-sexual-abuse/eu-strategy-more-effective-fight-against-child-sexual-abuse_en; https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12726-Fighting-child-sexual-abuse-detection-removal-and-reporting-of-illegal-content-online_en; https://home-affairs.ec.europa.eu/whats-new/campaigns/legislation-prevent-and-combat-child-sexual-abuse_en

Having analysed your arguments, the Secretariat-General considers that they do not demonstrate any pressing need for the public to obtain access to the redacted parts of the document requested.

Please note that general considerations or references to transparency do not demonstrate a pressing need for the disclosure of the documents requested and cannot provide an appropriate basis for establishing that a public interest prevails over the reasons justifying the refusal to disclose the documents in question²⁷.

The fact that the document in question concerns an issue which is of interest to non-governmental organisations, elected representatives and/or the wider public does not mean that there is an overriding public interest in disclosing said document. Nor does the mere reference to the fact that the document concerns a legislation that is of controversial nature constitute an overriding public interest in disclosure.

In light of the above, the Secretariat-General must conclude that the arguments you invoke do not demonstrate that the disclosure of the withheld parts of document 2 would contribute, in a concrete manner, to the protection of any public interest that would override the public interest protected by the first subparagraph of Article 4(3) (protection of the decision-making process) of Regulation (EC) No 1049/2001.

The Secretariat-General has thus not been able to identify any public interest capable of overriding the interest protected by the first subparagraph of Article 4(3) of Regulation (EC) No 1049/2001. On the contrary, the Secretariat-General considers the overriding public interest to be better served by ensuring the protection of the ongoing decision-making process.

Please note that Article 4(1)(a) and Article 4(1)(b) of Regulation (EC) No 1049/2001 do not include the possibility for the exceptions defined therein to be set aside by an overriding public interest.

4. PARTIAL ACCESS

In accordance with Article 4(6) of Regulation (EC) No 1049/2001, the Secretariat-General has considered the possibility of granting further partial access to the document requested.

However, for the reasons explained above, no further partial access is possible without undermining the interests described above. The protected parts are covered in their entirety by the invoked exceptions to the right of public access.

²⁷ Judgment of the Court of Justice of 14 November 2013, *Liga para a Protecção da Natureza (LPN) and Republic of Finland v European Commission*, Joined Cases C-514/11 P and C-605/11 P, EU:C:2013:738, paragraph 93.

5. MEANS OF REDRESS

Finally, I draw your attention to the means of redress available against this decision. You may either bring proceedings before the General Court or file a complaint with the European Ombudsman under the conditions specified respectively in Articles 263 and 228 of the Treaty on the Functioning of the European Union.

Yours sincerely,

For the Commission
Ilze JUHANSONE
Secretary-General

