



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR THE MIDDLE EAST, NORTH AFRICA AND THE GULF

Finance & Contracts and Legal Issues

Brussels

Ms Annick Hus
Belgium

By email only:
[ask+request-15549-
041b34c5@asktheeu.org](mailto:ask+request-15549-041b34c5@asktheeu.org)

Subject: Your application for access to documents

Ref.: EASE 2025/0832 - Ares(2025)1188915

Dear Ms Hus,

You requested access to:

'all documents [including but not limited to correspondence, emails, minutes, notes (hand written or electronic), audio or video recordings, verbatim reports, operational conclusions, lines to take, briefings, and presentations] related to the meeting on 19 September 2022 between the Commissioner Olivér Várhelyi and [the Federation of Associations for Hunting and Conservation of the EU (FACE)] on the "protection of biodiversity and nature".' (1)

Your request has been assigned to the Directorate-General for the Middle East, North Africa, and the Gulf (DG MENA).

The following documents have been identified in the archives of the Commission as falling within the scope of your request:

Meeting request by FACE, the Hungarian Hunters' National Association and the Hungarian Hunters' National Chamber - online, no date indicated

- 1. Email from FACE to Commissioner Várhelyi*
- 2. FACE Meeting Request to Commissioner Várhelyi*

(1) The other part of your request concerning a meeting held on 28 January 2025 by the Directorate-General for Environment (DG ENV) is being handled by DG ENV under reference EASE 2025/0831.

Having examined the above documents under the provisions of Regulation (EC) No 1049/2001 ⁽²⁾ I have come to the conclusion that partial access may be granted to them. Full access is prevented by the exception to the right of access laid down in Article 4(1)(b) (protection of the privacy and the integrity of the individual) of Regulation (EC) No 1049/2001.

In particular, these documents contain the following personal data:

- the names/initials and contact details of natural persons;
- handwritten signatures;
- other information relating to an identified or identifiable natural person (*functions, telephone numbers*).

Article 9(1)(b) of the Data Protection Regulation ⁽³⁾ 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 application, 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.

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.

Means of redress

For the sake of good order, I further refer to Article 7(2) of Regulation (EC) No 1049/2001. In accordance with this Article, you are entitled to make a confirmatory application requesting the Commission to review this position.

Such a confirmatory application should be addressed to the Secretary-General of the Commission within 15 working days upon receipt of this letter and can be submitted in one of the following ways:

by asking for a review via your ‘EASE’ portal ⁽⁴⁾ account (available only for initial requests submitted via the portal account)

or by mail:

European Commission
Secretariat-General

⁽²⁾ Regulation (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, Official Journal L 145 of 31 May 2001, p. 43.

⁽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 of 21 November 2018, p. 39.

⁽⁴⁾ <https://www.ec.europa.eu/transparency/documents-request>

Transparency, Document Management & Access to Documents (SG.C.1)
BERL 7/076
B-1049 Bruxelles/Brussel
or by email to: sg-acc-doc@ec.europa.eu

Yours sincerely,

Electronically signed

Christos KOMNINOS
Head of Unit

Enclosures: Documents 1-2