



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

The Director-General (acting)

Brussels

Ms Lora VERHEECKE
Belgium

By email only:
[ask+request-16567-
e3ebcc63@asktheeu.org](mailto:ask+request-16567-e3ebcc63@asktheeu.org)

Subject: Your request for access to documents

Ref.: EASE 2025/6026 – Ares(2025)9937523

Dear Ms Verheecke,

You requested:

“(...) All documents—including but not limited to correspondence (including email and letters) containing substantive discussion relevant to the meeting topic, attendance lists, agendas, background papers, transcripts, recordings, minutes, notes, and meeting conclusions—relating to the participation of Dubravka Šuica, European Commissioner for the Mediterranean, in the ECR event "Mattei Plan for Africa and Global Gateway: A new model for Europe-Africa relations" on 12th November 2025 [link] (...)”

We have identified the following documents falling within the scope of your request:

1. Invitation email to the event Ares(2025)8571205;
2. Invitation letter to the event Ares(2025)8571205;
3. Programme of the event Ares(2025)8571205;
4. Briefing Commissioner Mattei Plan CAB ŠUICA/444.

Please also be informed that the text of the speech by Commissioner Šuica at the High-Level event on the Mattei Plan and Global Gateway at the ECR Group is available at the following link: https://ec.europa.eu/commission/presscorner/detail/en/speech_25_2667.

The event was livestreamed and is available at the following link: https://ecrgroup.eu/2022/event/mattei_plan_for_africa_and_global_gateway_a_new_model_for_europe_africa_rel

Having examined the four above listed documents under the provisions of Regulation (EC) No 1049/2001 ⁽¹⁾, I have come to the following conclusions:

- Full access can be granted to documents 1 and 3. The information contained in document 3 (programme of the event) is publicly available at the following link: https://ecrgroup.eu/2022/event/mattei_plan_for_africa_and_global_gateway_a_new_model_for_europe_africa_rel.
- Partial access may be granted to documents 2 and 4. Full disclosure is prevented by the exceptions to the right of access laid down in Article 4(1)(a), third indent (protection of the international relations), Article 4(1)(b) (protection of the privacy and integrity of the individual) and Article 4(3) (protection of the ongoing decision-making process) of Regulation (EC) No 1049/2001.

Below are the justifications for the partial denial to disclosure:

1. Protection of the public interest as regards international relations

Full disclosure of document 4 is prevented by the exception concerning the protection of public interest as regards international relations outlined in Article 4(1)(a), third indent, of Regulation (EC) No 1049/2001.

As per settled case-law, 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’.

Document 4 is the briefing that was prepared for Commissioner Šuica ahead of the event. It contains information about international relations between the EU and the partner countries of the Mediterranean.

The parts of the briefing that are redacted contain sensitive information that is crucial to maintaining the integrity and confidentiality of the EU's international relations with countries in the Mediterranean. Disclosure of these sections could potentially undermine the strategic interests and diplomatic objectives of the EU in the region. Revealing specific details about ongoing strategic plans risks jeopardizing trust and cooperation with our partners across the Mediterranean.

Having regard to the above, I conclude that there is a reasonably foreseeable and non-hypothetical risk that disclosure of the document, or parts thereof, would undermine the protection of the public interest as regards international relations between the EU and its partner countries of the Mediterranean. Therefore, I consider that the use of the exception under Article 4(1)(a), third indent, of Regulation (EC) No 1049/2001 is justified, and that access to the document in question must be refused on that basis.

2. Protection of the privacy and the integrity of the individual

⁽¹⁾ 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.

Full disclosure of documents 2 and 4 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.

In particular, these documents contain the following personal data:

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

Article 9(1)(b) of the Data Protection Regulation ⁽²⁾ 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.

3. Protection of the ongoing decision-making process

Article 4(3) of Regulation 1049/2001 provides that ‘access 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’.

Full disclosure of document 4 would reveal internal opinions and internal follow-up points. The briefing contains paragraphs and charts that should not be disclosed as these are internal strategies, figures, reflections that have not yet been entirely endorsed internally and fully communicated. Disclosing these parts could potentially cause confusion to the public, by placing in the public domain preliminary statements, which do not necessarily reflect the final position of the Union.

In light of the above, the relevant undisclosed parts of Document 4 should be protected in accordance with Article 4(3), first and second subparagraph, of Regulation (EC) No 1049/2001.

Means of redress

⁽²⁾ 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.

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 its 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 ⁽³⁾ account (available only for initial requests submitted via the portal account)

or by mail:

European Commission

Secretariat-General

Transparency, Document Management & Access to Documents (SG.A.2)

BERL 7/076

B-1049 Bruxelles/Brussel

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

Yours sincerely,

Electronically signed

Michael KARNITSCHNIG

Enclosures: Documents 1-4

⁽³⁾ <https://www.ec.europa.eu/transparency/documents-request>