



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR AGRICULTURE AND RURAL DEVELOPMENT

The Director-General

Brussels
AGRI.I.1/RW D(2024)

Subject: Your application for access to documents No 2024/2341

Dear Ms Cann,

We refer to your request for access to European Commission documents registered on 6 May 2024 under the above-mentioned reference number.

You request access to: the following documents related to lobbying on PFAS, per and polyfluoroalkyl substances, in particular as:

1. A list of all meetings/ discussions since 1 January 2023 between officials and or Commissioners with businesses, trade associations, or think tanks where this topic was discussed.
2. Any records, minutes, preparatory briefings, or other notes of these meetings/discussions.
3. All correspondence since 1 January 2023, where this topic was discussed, exchanged between officials and or Commissioners with businesses, trade associations, or think tanks.

We have identified 4 documents with annexes that are relevant for this request.

You will find enclosed a list of them. Three documents with annexes are disclosed under the modalities explained in section (I) below. Access to the other documents is refused as explained under sections (II) below.

I. – Partial access – only personal data redacted

The full disclosure of the documents at hand is prevented by the exception concerning the protection of privacy and the integrity of the individual as 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;

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Belgium
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- the names/initials and contact details of other natural persons;
- handwritten signatures/abbreviated signatures of natural persons.

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

You may reuse public documents, which have been produced by the European Commission or by public and private entities on its behalf based on the [Commission Decision on the reuse of Commission documents](#). You may reuse the documents disclosed free of charge and for non-commercial and commercial purposes provided that the source is acknowledged and that you do not distort the original meaning or message of the documents. Please note that the Commission does not assume liability stemming from the reuse.

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 documents without the agreement of the originator, who may hold an intellectual property right on them. The European Commission does not assume any responsibility for their reuse.

II. Refusal – third party’s document No 3 with annexes

Following an examination of the document No 3 with annexes originating from a third party, under the provisions of Regulation (EC) No 1049/2001 regarding public access to documents and taking into account the opinion of the author of document concerned, I regret to inform you that it cannot be disclosed, as disclosure is prevented by the exception to the right of access laid down in Article 4 of this Regulation.

The author of the said documents has been consulted and has objected to their public disclosure in order to protect its own interests. On substance, we consider that the public disclosure of these third-party documents could undermine the commercial interests of this third party because it could affect its reputation and its position in future interactions with

(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. 3.

other third parties. In this sense, the disclosure of these documents is prevented by Article 4(2), first indent, of Regulation (EC) No 1049/2001.

We have considered whether partial access could be granted to these documents, but they are entirely covered by the above-mentioned exception. Neither do we see any overriding public interest in disclosure.

If you 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 to the Secretariat-General of the Commission within 15 working days upon receipt of this letter. You can submit it in one of the following ways:

by asking for a review via your portal² account (available only for initial requests submitted via the portal account),

or by post to:

European Commission

Secretariat-General

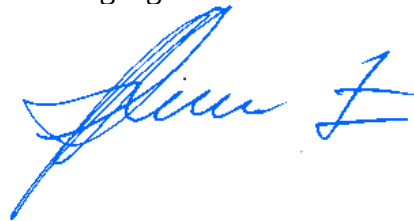
Transparency, Document Management & Access to Documents (SG.C.1)
BERL 7/076

B-1049 Bruxelles

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

Yours sincerely,

In absence of the Director General
Wolfgang BURTSCHER



Mihail DUMITRU
Deputy Director General

Enclosure: 3 documents with annexes and list of identified document/type of disclosure

² <https://www.ec.europa.eu/transparency/documents-request>