

Helsinki, 12 November 2024 SD/as

Ms. Vicky Cann
CEO
Rue d'Edimbourg 26
1050
Brussels
Belgium

Sent by email only: ask+request-14971-c4673756@asktheeu.org

Subject: Reply to your request for access to documents

Reference: ATD / 109 / 2024

Dear Ms Cann,

I refer to your request for access to documents under Regulation (EC) No 1049/2001 (the "ATD Regulation") dated 12 September 2024, registered on 13 September 2024, under the above-mentioned reference number.

Your request concerns access to documents related to lobbying on PFAS, per and polyfluoroalkyl substances. In particular :

1. A list of all meetings/ discussions since 6 June 2024 between officials and 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 6 June 2024, where this topic was discussed, exchanged between officials and businesses, trade associations, or think tanks.

ECHA has identified the following 14 documents as falling within the scope of your request:

- ATD-2024-109 DirD 3rdP TPC Siuki att1_Redacted
- ATD-2024-109 DirD 3rdP TPC Hazardous Waste Europe att2_Redacted
- ATD-2024-109 DirD 3rdP TPC EMEA att3_Redacted
- ATD-2024-109 DirD 3rdP TPC Euromot att4_Redacted
- ATD-2024-109 DirD 3rdP TPC Eurelectric att5_Redacted
- ATD-2024-109 DirD 3rdP TPC DSV att6_Redacted
- ATD-2024-109 DirD 3rdP TPC DSV att6_minutes_Redacted

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- ATD-2024-109 DirA 3rdP TPC Universita del Pemonte Orientale att7_Redacted
- ATD-2024-109 DirA 3rdP TPC Oxyle att8_Redacted
- ATD-2024-109 DirA 3rdP TPC Forum Europe att9_Redacted
- ATD-2024-109 DirA 3rdP TPC Polish Chamber of Chemical Industry att10_Redacted
- ATD-2024-109 DirA 3rdP TPC Chemical Watch events att11_Redacted
- ATD-2024-109 DirA 3rdP TPC EDA att12_Redacted
- ATD-2024-109 DirA 3rdP TPC BioNanoNet att13_Redacted

Decision

Based on Article 7(1) of the ATD Regulation¹

ECHA has decided to grant you partial access to the requested documents

You can find the non-confidential version of the document(s) enclosed to this letter.

Reasons

Following an individual assessment of the documents requested under the provisions of the ATD Regulation, and taking into account the comments received from the consulted third parties, ECHA has concluded that its/their disclosure is partly prevented by exceptions to the right of access laid down in Article 4 of this regulation. The reasons as to why specific redactions have been performed are provided below.

i. Protection of privacy and the integrity of an individual

Information concerning an identified or identifiable natural person

Under Article 4(1)(b) of the ATD Regulation, ECHA must refuse access to a document in case disclosure would undermine the protection of privacy and the integrity of an individual. Where a request based on the ATD Regulation seeks to obtain access to documents including personal data, the provisions of Regulation (EU) 2018/1725 apply. According to Article 3(1) of Regulation (EU) 2018/1725 the term 'personal data' means any information relating to an identified or identifiable natural person. The necessity to have this data transferred for a specific purpose in the public interest, as required by Regulation (EU) 2018/1725, has not been established. Therefore, the information at stake has been redacted from all the documents.

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.](#) .

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Procedural history

On 1 October 2024, we made a fair solution proposal in accordance with Article 6(3) of the ATD Regulation to extend the deadline for a maximum of three months as your application concerned a large number of documents. On 2 October 2024, you proposed a one-month deadline. On 2 October 2024, we offered to handle your request with 30 working days and you accept it on the same day.

Means of redress

You are entitled to make a confirmatory application requesting ECHA to review this position by writing to the Executive Director of ECHA (P.O Box 400, 00121 Helsinki, Finland or executive-director@echa.europa.eu). This needs to be done within 15 working days, as applicable in your country, of receiving this letter.

Yours sincerely,

(e-signed)²
Simone Doyle

Head of Risk Management Unit I

Encl:

- ATD-2024-109 DirD 3rdP TPC Siuki att1_Redacted
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- ATD-2024-109 DirA 3rdP TPC BioNanoNet att13_Redacted

² As this is an electronic document, it is not physically signed. This communication has been approved according to ECHA's internal decision-approval process.