# The art of FOIing the EU

**Dataharvest Masterclass**
**17 November 2021**
**Stéphane Horel, Le Monde**

# Chapter 1: Theory



**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**

THE EUROPEAN PARLIAMENT AND THE COUNCIL OF THE EUROPEAN UNION,

*Having regard to the Treaty establishing the European Community, and in particular Article 255(2) thereof,*

*Having regard to the proposal from the*

*Acting in accordance with the proce 251 of the Treaty (2),*

*Whereas:*

*The second subparagraph of Article 1 of the Treaty on European Union enshrines the concept of openness, stating that the Treaty marks a new stage in the process of creating an ever closer union among the peoples of Europe, in which decisions are taken as openly as possible and as closely as possible to the citizen.*

*Openness enables citizens to participate more closely in the decision-making process and guarantees that the legitimacy and is more*

this Regulation as regards documents co activities covered by those two Treaties.

(6) Wider access should be granted to do where the institutions are acting i capacity, including under delegated p same time preserving the effectivene decision-making process. Such d made directly accessible to the p

(7) In accordance with Articles Treaty, the right of access relating to the common fo to police and judicial co Each institution should

(8) In order to ensure t to all activities of the institutions sh this Regulation.

(9) On accoun

"Any citizen of the Union, and any natural or legal person residing or having its registered office in a Member State, has a right of access to documents of the institutions" (Art. 2)

What is a '**document**'? 

"any content whatever its medium (written on paper or stored in electronic form or as a sound, visual or audiovisual recording) (Art. 3)

- all **correspondence** (including, but not limited to, emails, letters, and/or telephone call notes) including attachments

- the list of **meetings** with detailed minutes and any other reports of such meetings, all documents prepared for the purpose of these meetings and issued after these meetings, and documents exchanged during the course of these meetings

- texts and WhatsApp **messages**

# But there are "**exceptions**" (Art. 4)

(of course there are, what were you thinking? 🎅)

- Security, defence & military, international relations, financial, monetary or economic policies (4.1a)
- Privacy, personal data (4.1b)
- Commercial interest, court proceedings, investigations (4.2)
- Ongoing decision-making process (4.3)
- Third party / Member States (4.4; 4.5)

# **Exceptions** in 2020

| Reason | Initial stage (%) |
|---|---|
| Security, defence & military, international relations, financial, monetary or economic policies (4.1a) | 13,5 |
| Privacy, personal data (4.1b) | 44 |
| Commercial interest, court proceedings, investigations (4.2) | 18 |
| Ongoing decision-making process (4.3) | 12 |
| Third party / Member States (4.4; 4.5) | 0,36 |

# **Outsmart** uberqualified lawyers

* Be **precise** —> time frame

* Be **reasonnable** —> target and offer priorisation as “fair solution”

* Be **patient**

* Be **ready to play** with super qualified lawyers

# How to pretend you make a **compromise**

1) all correspondence (including emails), the list of meetings with detailed minutes and any other reports of such meetings concerning the consultation on the 1999 chlorpyrifos DAR within the EU Commission, and also between the EU Commission and Member States or Member States competent authorities.
2) all correspondence (including emails) to the EU Commission from Dow and other chlorpyrifos manufacturers from January 1993 to December 1995.
3) all correspondence (including emails) concerning the designation by the EU Commission of Spain as the rapporteur Member State for chlorpyrifos between 1993 and 1995.
4) the minutes of the first tripartite meeting of 23 October 2000 on chlorpyrifos with the main data submitter and the rapporteur Member State, and also all correspondence (including emails) concerning this meeting.
5) all correspondence (including emails), the list of meetings with detailed minutes and any other reports of such meetings concerning the consultation following the first tripartite meeting of 23 October 2000 on chlorpyrifos.
6) the minutes of the second tripartite meeting of 3 Februray 2004 on chlorpyrifos with the main data submitter and the rapporteur Member State, and also all correspondence (including emails) concerning this meeting.
7) all correspondence (including emails), the list of meetings with detailed minutes and any other reports of such meetings concerning the consultation following the second tripartite meeting of 3 February 2004 with the main data submitter and the rapporteur Member State.
8) all documents (correspondence, memos, etc.), and the list of meetings with detailed minutes and any other reports of such meetings concerning the final examination and review of chlorpyrifos for the meetings of the Standing Committee on the Food Chain and Animal Health (SCOPAFF) of 3 June 2005.
9) the detailed minutes of the meeting of the SCOPAFF of 3 June 2005.
10) the Review Report (SANCO/3059/99 – rev. 1.5) for chlorpyrifos, finalised in the Standing Committee on the Food Chain and Animal Health (SCFCAH).
11) all correspondence (including emails), the list of meetings with detailed minutes and any other reports of such meetings concerning the request by DG SANCO to the Chlorpyrifos Task Force to provide toxicological studies to the Commission, to EFSA and to Spain as rapporteur Member State (RMS) in 2012.

**Initial FOI request**

**(I admit I got carried away)**

And on **chlorpyrifos and/or other plant protection products**:

14) the concise outline report of ECCO 131 peer review meeting (14464/ECCO/BVL/03, 12 February 2003), and all its annexes, including:
-Annex 5: thiamethoxam (Rep_4(ECCO131)_5thiamethoxam.doc)
-Annex 6: chlorpyrifos (Rep_4(ECCO131)_6chlorpyrifos.doc)
-Annex 7: chlorpyrifos-methyl (Rep_4(ECCO131)_7chlorpyrifos-methyl.doc)
15) the concise outline report of ECCO 132 peer review meeting (14691 /ECCO/BVL/03, 10 March 2003), and all its annexes, including:
-Annex 5:thiamethoxam (Rep_1(ECCO132)_5thiametoxam.doc)
-Annex 6: chlorpyrifos (Rep_1(ECCO132)_6chlorpyrifos.doc)
-Annex 7: chlorpyrifos-methyl (Rep_1(ECCO132)_7chlorpyrifos-methyl.doc)
16) the concise outline report of ECCO 82 peer review meeting, and all its annexes (1999)
17) the concise outline report of ECCO 76 peer review meeting, and all its annexes (1999)
18) the concise outline report of ECCO 78 peer review meeting, and all its annexes (1999)

**(I deleted stuff)**

1) all correspondence (including emails), the list of meetings with detailed minutes and any other reports of such meetings concerning the consultation on the 1999 chlorpyrifos DAR within the EU Commission, ~~and also between the EU Commission and Member States or Member States competent authorities.~~
2) all correspondence (including emails) to the EU Commission from Dow and other chlorpyrifos manufacturers from January 1993 to December 1995.
3) all correspondence (including emails) concerning the designation by the EU Commission of Spain as the rapporteur Member State for chlorpyrifos between 1993 and 1995.
   **>>>** all correspondence (including emails) *between the EU Commission and Spain* concerning the designation by the EU Commission of Spain as the rapporteur Member State for chlorpyrifos between 1993 and 1995.
4) the minutes of the first tripartite meeting of 23 October 2000 on chlorpyrifos with the main data submitter and the rapporteur Member State, ~~and also all correspondence (including emails) concerning this meeting.~~
5) ~~all correspondence (including emails), the list of meetings with detailed minutes and any other reports of such meetings concerning the consultation following the first tripartite meeting of 23 October 2000 on chlorpyrifos.~~
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7) ~~all correspondence (including emails), the list of meetings with detailed minutes and any other reports of such meetings concerning the consultation following the second tripartite meeting of 3 February 2004 with the main data submitter and the rapporteur Member State.~~
8) all documents (correspondence, memos, etc.), and the list of meetings with detailed minutes and any other reports of such meetings concerning the final examination and review of chlorpyrifos for the meetings of the Standing Committee on the Food Chain and Animal Health (SCOPAFF) of 3 June

# Delays

– Within **15 working days** from registration of the request (+**15**)

– **Confirmatory application** if total/partial refusal or no response

# Reminder

# Where to **FOI**

## the EU Commission

https://ec.europa.eu/transparency/regdoc/index.cfm?fuseaction=fmb&language=en

## the European Parliament

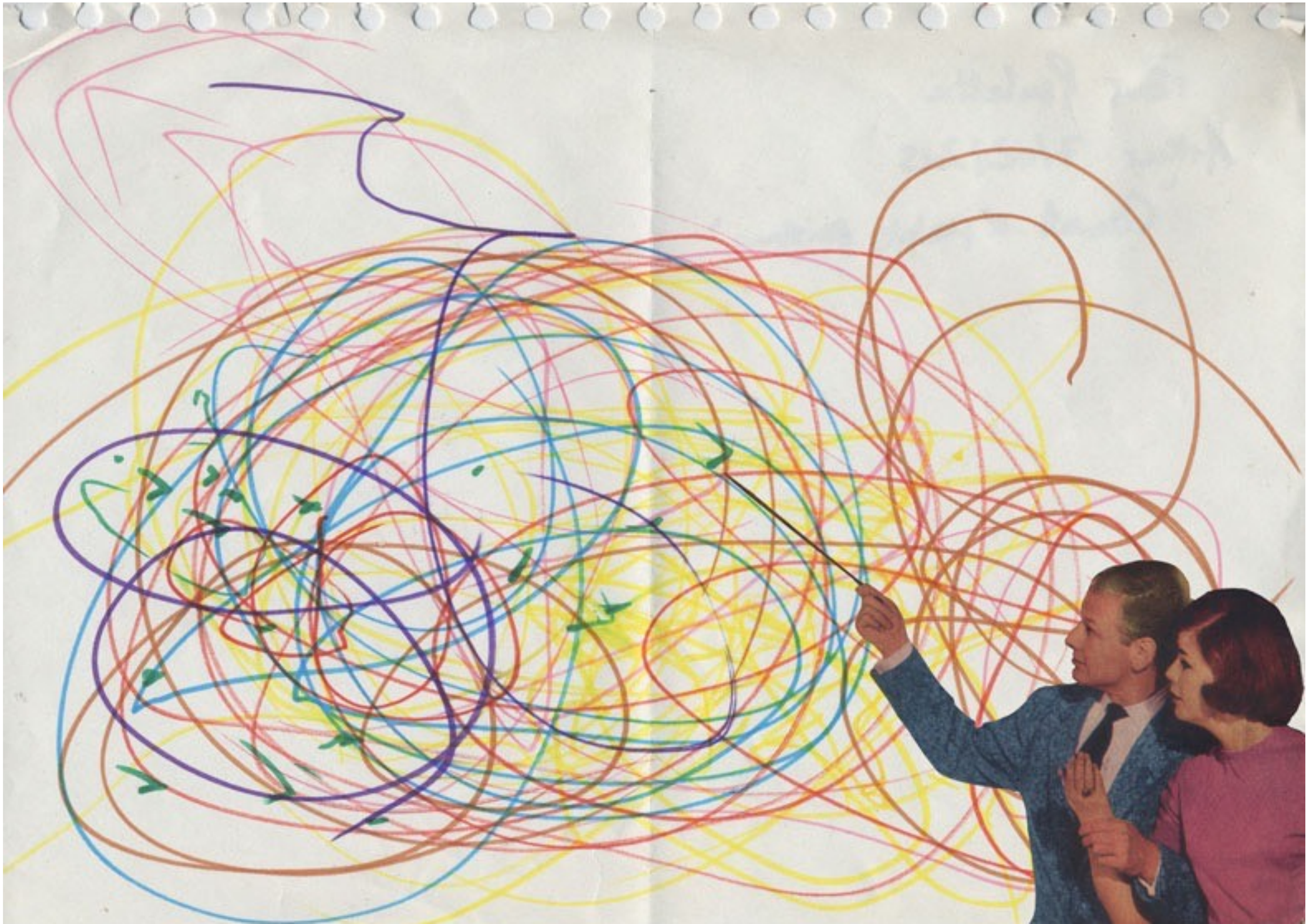
https://www.europarl.europa.eu/RegistreWeb/requestdoc/secured/form.htm?language=EN

## the Council

https://www.consilium.europa.eu/en/documents-publications/public-register/request-document/


https://www.asktheeu.org/fr

# Chapter 2: Practice



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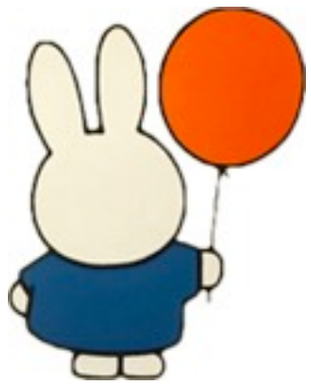

**Grey on Grey (2014)**
**European Commission**

# FOI as a tool to investigate LOBBYING

# what LOBBYING is

**Scrap**

**Water down**

**Divert**

**Delay**

**Write**

**the law**

# who are the "LOBBYS"

* **Trade associations :**
**Business Europe, CEFIC, CosmeticsEurope, EFPIA...**

* **In-house lobbyists : Bayer, BASF, Microsoft...**

* **Lobbying and public relations firms :**
**APCO, Burson-Marsteller, Fleishman-Hillard...**

* **Think tanks : European Risk Forum...**

* **Law firms**

* **Product-Defense firms (science & technical matters)**
**Exponent, Gradient, The Weinberg Group,...**

# diy MAPPING

## Influencers

European Crop Protection

CropLife

American Chemistry Council

cefic

AmCham EU
SPEAKING FOR AMERICAN BUSINESS IN EUROPE

BAYER

syngenta

## Targets

European Commission

Council

European Parliament

+ EU Agencies

# WHO's who

EU Whoiswho

**https://op.europa.eu/en/web/who-is-who**

| | | | | |
|---|---|---|---|---|
| | | CAB TAJANI | http://www.europarl.europa.eu/the-president/fr/le-cabinet | |
| **EVANS Lowri (mrs)** | DG GROW | Director general | https://ec.europa.eu/info/persons/director-general-lowri-evans_en | 09.2015 – |
| **D'ACUNTO Salvatore** | DG GROW | Head of unit<br>Dir D — D/4 Health Technology and Cosmetics | | |
| **PETTINELLI Carlo** | DG GROW | Director<br>Dir D — Consumer, Environmental and Health Technologies | Led the negotiations in trilogue | (11.2015)<br>=2018 |
| **HANSSON Erik** | DG GROW | Deputy Head of Unit<br>Dir D — Consumer, Environmental and Health Technologies<br>Unit 4. Health technology and Cosmetics | Working on MDs since 2012, in charge of the implementation of the Commission's « PIP Action plan ».<br>EU rep at IMDRF http://www.imdrf.org/about/mcma.asp | |
| **ROCHE Jean-François** | DG GROW | Policy Officer<br>Dir D — Consumer, Environmental and Health Technologies<br>Unit 4. Health technology and Cosmetics | | |
| **HOUDRY Vincent** | DG GROW | Policy Officer Medical Devices<br>Dir D — Consumer, Environmental and Health Technologies<br>Unit 4. Health technology and Cosmetics | Formely at the Permanent representation of France in Brussels at the Council as Counsellor (health, medicines and medical devices) at the Employment, social policy and health department 2012-2016<br>https://www.linkedin.com/in/vincent-houdry-58403a32/<br>Formerly French ministry/agency ANSM.<br>One bio says he worked for the industry but this is not mentioned on his linkedIn profile<br>https://www.medpharmplasteurope.org/sites/default/files/articles/files/29-11-2016%20MPPE%20Conference%202016_speakers%27%20bios.pdf. | Since July 2016 |
| **SCALZO Salvatore** | DG GROW | Policy and Legal Officer THEN Legal Assistant<br>Dir D — Consumer, Environmental and Health Technologies<br>Unit 4. Health technology and Cosmetics | Main tasks: Negotiation of the proposed new EU Regulations on medical devices; Coordinator of the the EU Work Groups on device identification and traceability (UDI) and medical software; Harmonised standards (evaluation and daily policy management); contribution to the coordination of IMDRF (International Medical Devices Regulators Forum)-related activities and representation of the EU in the Forum; Policy and legal support in the context of other international activities; EU member of the GMDN (Global Medical Device Nomenclature) Policy Advisory Group. | Nov. 2013 |

# “Participation: the sooner, the better”

# HARVEST time

| Nr. | Title of document | Type of document | Date of document | Association/Organisation/Company concerned | Reference Number | Sender | Addressee | Attachment(s) | Disclosure? (Y/N) | Exception under Regulation 1049/2001 | Comments |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | | | | | |
| 1 | N/A | letter | 16/01/2012 | | Ares(2012)54128 | MEP M. McGuinness | Commission | | Y | Article 4(1)(b) | redaction of content which is outside the scope of the request |
| 2 | N/A | letter | 31/01/2012 | | Ares(2012)123821 | MEP M. McGuinness | Commission | | Y | Article 4(1)(b) | redaction of content which is outside the scope of the request |
| 3 | Poly Implants Prothese (PIP) | letter | 23/02/2012 | | Ares(2012)208773 | Commission | MEP M. McGuinness | | Y | Article 4(1)(b) | redaction of content which is outside the scope of the request |
| 4 | Revision of the regulatory framework for medical devices | note+annex to the note | 02/02/2012 | | Ares(2012)118034 | Commission | N/A | 1 | partial | Articles 4(1)(b); 4(2) | |
| 5 | Commission letter | e-mail+letter | 06/02/2012 | | Ares(2012)135080 | Team-NB | Commission | 1 | Y | Article 4(1)(b) | |
| 6 | N/A | letter | 01/03/2012 | | Ares(2012)240920 | Commission | Team-NB | | Y | Article 4(1)(b) | redaction of content which is outside the scope of the request |
| 7 | MedTech Forum 2012 | e-mail+letter | 29/05/2012 | | Ares(2012)641783 | Eucomed | Commission | | Y | Article 4(1)(b) | |
| 8 | COCIR concerns on Medical Devices legislation | e-mail | 27/06/2012 | | Ares(2012)779037 | COCIR | Commission | | Y | | |
| 9 | Eucomed letter MDD revision | e-mail+letter+annex to the letter | 17/07/2012 | | Ares(2012)873810 | Eucomed | Commission | 2 | Y | Article 4(1)(b) | |
| 10 | N/A | letter | 02/08/2012 | | Ares(2012)935916 | Commission | Eucomed | | Y | Article 4(1)(b) | |
| 11 | Medical devices briefing | e-mail+note | 21/09/2012 | | Ares(2012)1098020 | Commission | N/A | 1 | Y | Article 4(1)(b) | redaction of content which is outside the scope of the request |
| 12 | Proposal for a regulation on medical devices | e-mail | 21/09/2012 | | Ares(2012)1109499 | AESGP | Commission | | Y | Article 4(1)(b) | |
| 13 | MDR | e-mail | 16/01/2013 | | Ares(2013)55178 | BVMed | Commission | | Y | Article 4(1)(b) | |
| 14 | Your e-mail on medical devices regulation | letter | 06/02/2013 | | Ares(2013)152895 | Commission | BVMed | | Y | Article 4(1)(b) | |
| 15 | IVD - legal advice | e-mail+note | 21/01/2013 | | Ares(2013)69533 | MEP Liese | Commission | 1 | Y | Article 4(1)(b) | English language version of the note is provided |
| 16 | Invite to speak on changing medical Device regulations | e-mail | 29/03/2013 | | Ares(2013)721200 | BSI | Commission | | Y | Article 4(1)(b) | |
| 17 | Invite to speak on changing medical Device regulations | e-mail | 15/04/2013 | | sanco.ddg1.b.dir(2013)788816 | Commission | BSI | | Y | Article 4(1)(b) | |
| 18 | Draft reports of the European Parliament on the Proposal for a Regulation on medical devices | note | 22/04/2013 | | Ares(2013)735775 | Commission | N/A | | Y | Article 4(1)(b) | |
| 19 | re: Invitation to speak at European MedTech CEO RoundTable | e-mail+letter | 18/06/2013 | | Ares(2013)2471851 | MedTech Europe | Commission | 1 | Y | Article 4(1)(b) | |

# this is your LIFE now


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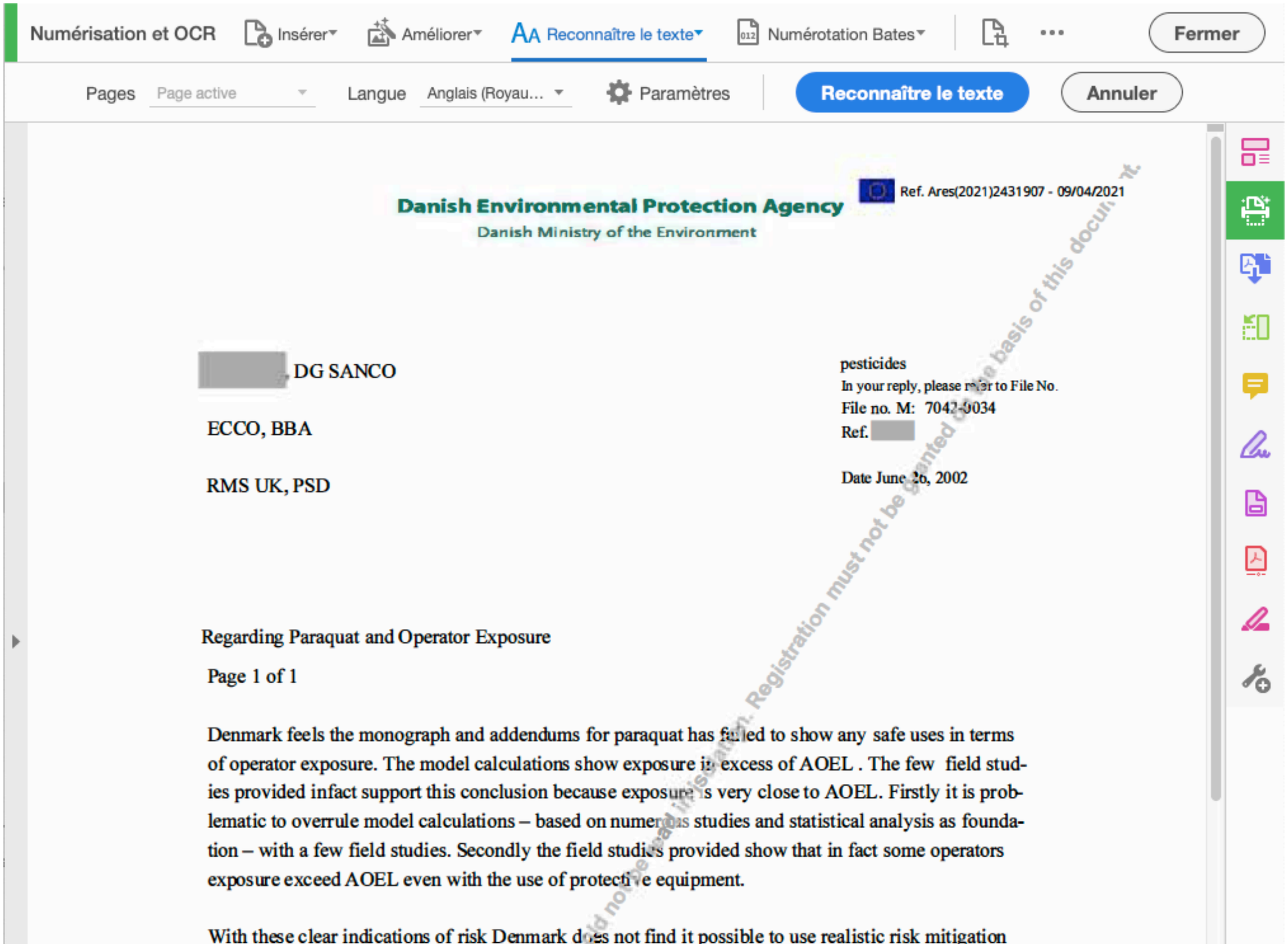
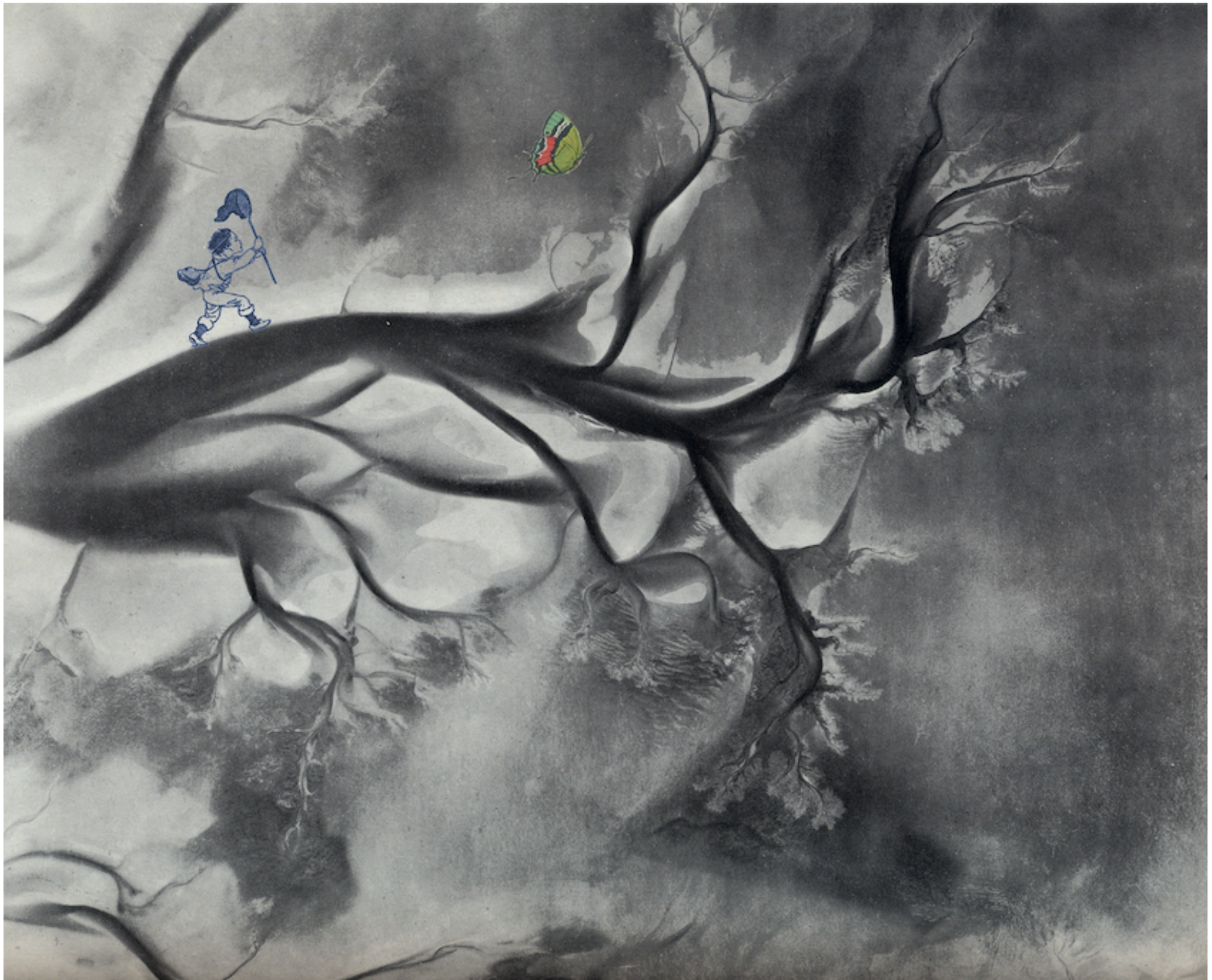
# a FOI 🤓's best friend 1: OCR



# a FOI🤓's best friend 2: TIMELINE

# if you are LUCKY (good old days memories)



**FUEHRING Stefan (SG)**

**From:** < .@bayer.com>
**Sent:** 07 June 2013 14:04
**To:** KLINGBEIL Marianne (SG); MOSER Stefan (SG)
**Cc:**
**Subject:** Notwendigkeit für Impact Assessment - Vorschlag der Kommission zu Endokrinen Disruptoren
**Attachments:** Teagasc ED Impact Assessment.pdf; 22658_Agri impact of ED criteria - April 2013 (2).pdf

**Categories:** Blue Category

Sehr geehrte Frau Dr. Klingbeil, sehr geehrter Herr Moser,

Die Europäische Kommission bereitet zur Zeit unter Federführung von DG ENV eine „Empfehlung für eine Gemeinschaftsstrategie zu Endokrinen Disruptoren" vor. Hierbei wird die Kommission auch einen Vorschlag („Recommendation") für die Definition, Identifizierung und Kategorisierung von Endokrinen Disruptoren vorlegen. Die Empfehlung ist engstens verknüpft mit den EU-Regulierungen zu Chemikalien, Pflanzenschutzmitteln, Bioziden und Kosmetika (Notwendigkeit der Umsetzung erfolgt in sektorale Gesetzgebung).

Wir bitten Sie deswegen, sich für die Durchführung eines Impact Assessments einzusetzen.

Sehr gerne würden wir weitere Argumente, die auf einer Analyse einer von uns beauftragten Internationalen Kanzlei beruhen, mit Ihnen in einem persönlichen Gespräch noch vor der Sommerpause austauschen.

Freundliche Grüße / Best regards

Bayer CropScience

**Science For A Better Life**

Bayer CropScience
Square de Meeus 40
Belgium – 1000 Brussels

14 March 2013 20:56
GIRAL-ROEBLING Anne (ENTR)
[redacted]@basf.com; [redacted]@basf.com
Endocrines
Proposal to amend ED criteria.doc; ECPA agri impact assessment of ED criteria - 8 March 2013.doc

"impact assessment"

e that my colleague Tobias sent out earlier today to your Cabinet Colleague Massimo
oposed wording about exactly your idea we discussed in our meeting with you, Eric,
gou about hazard characterization - and also a very recent impact assessment as we also
ing our meeting. Plse let me know if you find this helpful and if we should forward the impact
colleagues.

HANSEN Bjorn (ENV); KORYTAR Peter (ENV)
ARENA Francesca (SANCO); FLUEH Michael (SANCO); BEREND Klaus (ENTR);
LIEGEOIS Eric (ENTR); Euros Jones; FABRIZI Laura (SANCO); GIRAL-ROEBLING Anne
(ENTR); MUNN Sharon (JRC-ISPRA); EMBERGER Geraldine (TRADE); [redacted]@cefic.be;
[redacted]@cefic.be; VAN DER JAGT Katinka (ENV)
RE: ECPA comments on document "Revised version of possible elements for criteria for identification of endocrine disrupters" - February 2013
22661_ECPA response to DG Env ED criteria questions - 8 March 2013.doc; ECPA agri impact assessment of ED criteria - 8 March 2013.doc

"possible impacts of the final criteria."

cognise the calls for further information on the possible impacts of the final criteria. This has no
ntforward task with several elements of the proposals being uncertain. But based on the second
appears closer to the final criteria, we have undertaken an impact assessment for pesticides wh

.@ecpa.eu>
23 March 2013 11:31
JOHNSTONE Duncan (SG)
[redacted]@dow.com
Follow-up: Meeting with Dow AgroSciences and the European Crop Protection Association: Wednesday 20 March at 10.00
3-US-EPA Comments - Commission ED Criteria.pdf; 22658 ECPA agri impact assessment of ED criteria - March 2013.pdf

"lack of impact assessment"

the key points for us is the lack of impact assessment to accompany the development of
elieves will have deep impacts *inter alia* on manufacturing, trade, agricultural output and
s to develop criteria to identify and rules to regulate endocrine disruption has been ongoing

[redacted]@amchameu.eu>
24 May 2013 09:58
GIRAL-ROEBLING Anne (ENTR)
[redacted]@eppa.com
Request for a meeting with AmCham EU: lacking impact assessment on endocrine disruption draft criteria - 30 May meeting of the Commission's ad hoc working group on endocrine disruptors

ear Ms. Giral-Roebling,

"assessing what its impacts will be"

such a decision will have wide reaching implication for the REACH system and other EU environmental policy ,as w
for all industry actors who comply with this legislation, and we are worried to see that this decision, which is the s
of many scientific debates, might be taken on political grounds, without first assessing what its impacts will be on
European Market.

< .@bayer.com>
07 June 2013 14:04
KLINGBEIL Marianne (SG): MOSER Stefan (SG)
Notwendigkeit für Impact Assessment - Vorschlag der Kommission zu Endokrinen Disruptoren
Teagasc ED Impact Assessment.pdf; 22658_Agri impact of ED criteria - April 2013 (2).pdf

eehrte Frau Dr. Klingbeil, sehr geehrter Herr Moser,

**From:** Pierre Bouygues [mailto:PBO@amchameu.eu]
**Sent:** Wednesday, May 29, 2013 9:36 AM
**To:** DUDZINSKA Katarzyna (BEPA)
**Cc:** GLOVER Anne (BEPA); MUELLER Jan Marco (BEPA); meglena.mihova@eppa.com
**Subject:** RE: Request for a meeting with AmCham EU: lacking impact assessment on endocrine disruption draft criteria

Dear Ms. Dudzinska,

"impact assessment"

The AmCham EU Environment Committee has just [redacted] ed that any decision on thresholds for endocrine disruptors would be adopted at the end of June.
Therefore, we would like to kindly request a meeting with Professor Glover before the end of June to discuss with her the importance of an impact assessment before

om: FLUEH Michael (SANCO)
ent: 07 October 2013 14:35
o: [redacted]
ubject: FW: BTO of meeting Commissioner Borg/ECPA on 26 September 2013

On endocrine disruptor industry welcomes work of EFSA and on fact that impact assessment will now be carried out.

Dear Mrs Benini

[redacted]@ecpa.eu>
25 June 2013 07:11
Francesca.Benini@ec.europa.eu
GIRAL-ROEBLING Anne (ENTR); [redacted]@basf.com; [redacted]@basf.com
Follow-up: Meeting with ECPA and BASF regarding Endocrine Disruptors
W13-032 - RD spending.pdf

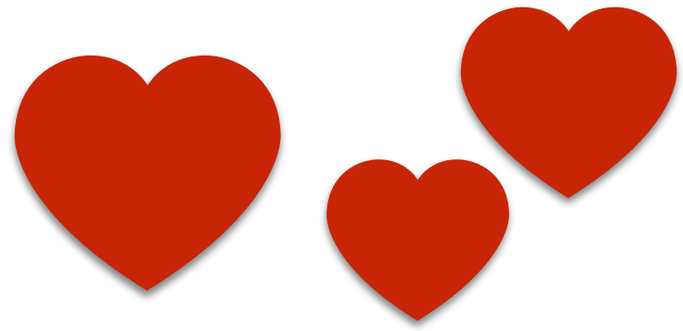
"substancial impact on research"

**From:** [redacted]
**Sent:** Tuesday, July 07, 2015 2:48 PM
**To:** BERMIG Carsten (CAB-BIENKOWSKA)
**Subject:** BVMed goes Brussels – Trilog zur Medical Device Regulation kann beginnen / Einladung zum Arbeitsessen am 21. September 2015

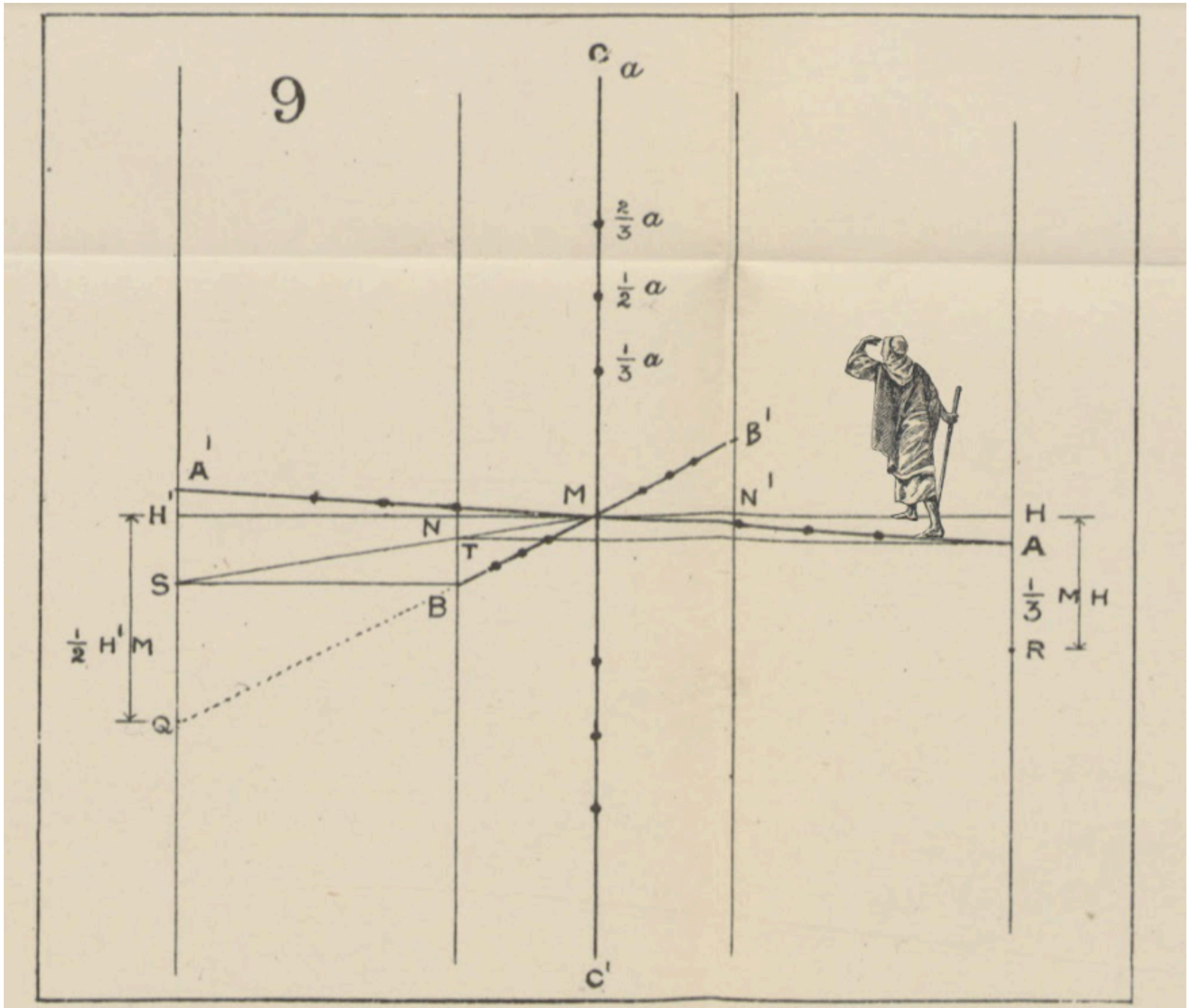
Ende Juni hat der Europäische Rat eine Positionierung zur geplanten Medizinprodukteverordnung (Medical Device Regulation) gefunden. Im September könnte dann der Trilog beginnen.

Bei einem

**Arbeitsessen im Restaurant „Amor Amor“**
**Rue du Trône, 59**
**1050 Bruxelles**
**am Montag, 21. September 2015**
**von (18.30 Empfang) 19.00 – 21.00 Uhr**



# if you are NOT lucky (present times ballad)



– Explosion of **delays** aggravated by the Covid crisis

"An extended time limit is needed due to internal consultations and a thorough analysis of your request."

"potentially a very large number of documents and information."

"The queries and verifications require indeed a workload that cannot be absorbed within the extended time limit."

"This email is just to inform you that the reply is under hierarchical validation and it will be sent to you as soon as signed at the appropriate level."

EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR HEALTH AND FOOD SAFETY

Food and feed safety, innovation
**Pesticides and biocides**

Brussels,
SANTE.E.4/DI/mb(2020)470117

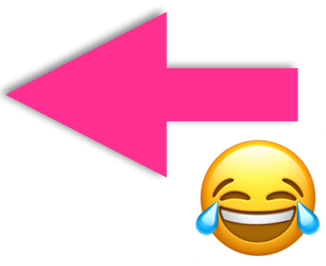
*Sent by email only to: horel@lemonde.fr*

Dear Ms Horel,

**Subject:** **Your application for access to documents – Ref GestDem No 2020/0297**

According to our first estimates, the handling of your request would take 63 working days, broken down as follows:

- identification of the documents falling under your request: 20 working days;
- retrieval and establishment of a complete list of the documents identified: 3 working days;
- scanning of the documents: 3 working days;
- assessment of the content of the documents in light of the exceptions of Article 4 of Regulation 1049/2001: 10 working days:
- third-party/Member State consultations under Article 4(4) and/or 4(5) of Regulation 1049/2001: 10 working days;
- final assessment of the documents in light of the comments received: 5 working days;
- drafting of the reply: 2 working days;
- redaction of those parts of the documents to which one or several exceptions apply(ies): 3 working days;
- internal approval of the draft decision on your request: 5 working days;
- preparation of the reply and the documents for dispatch (scanning of the redacted versions, administrative treatment,…): 2 working days.



– **Redaction** of Commission staff names under Director level

**SPEER Suzanne (BEPA)**

**From:** [redacted]@cefic.be> on behalf of [redacted]@cefic.be>
**Sent:** Monday 17 March 2014 16:32
**To:** [redacted] (ENV); [redacted] (ENV); [redacted] (ENTR); [redacted] (ENTR); [redacted] (ENTR); [redacted] (SANCO); [redacted]@ec.europa.eu; [redacted] (SANCO); [redacted] (SANCO); EC CSA; [redacted]@ec.europa.eu.; [redacted]@ec.europa.eu; [redacted] (TRADE); [redacted] (TRADE); [redacted] (TRADE); [redacted] (TRADE); [redacted] (TRADE); [redacted]@ec.europa.eu; [redacted] (RTD); [redacted] (RTD); [redacted] (RTD); [redacted] (SG); [redacted] (AGRI); [redacted] (AGRI); [redacted] (AGRI); [redacted]@ec.europa.eu; [redacted]@ec.europa.eu; [redacted] (JRC-ISPRA); [redacted] (JRC-ISPRA); [redacted] (SG); [redacted] (SG)
**Cc:** [redacted] - ECPA (European Crop Protection Association)

– "**Out of scope**"

– Limitations on the **number** of documents

# The EU Ombuds(wo)man, TRANSPARENCY advocate

# One FOI a day keeps the doctor away

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@stephanehorel
Signal + 33 686 92 77 18