



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR MIGRATION AND HOME AFFAIRS

The Director-General

Brussels  
HOME/MV

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10179 Berlin  
Germany

E-mail:  
v.deleja-

**Subject: Your application for access to documents – GESTDEM 2022/2671**

Dear Ms Deleja-Hotko,

We refer to your e-mail of 12 May 2022 in which you make a request for access to documents, registered on 12 May 2022.

Due to the nature of your request, covering areas falling under the responsibility of more Directorates-General, a part of your request has been attributed to Directorate-General for Neighbourhood and Enlargement Negotiations.<sup>1</sup> This reply relates only to the documents held by Directorate-General for Migration and Home Affairs registered under the above-mentioned reference number. You will receive the reply from DG NEAR in due course.

You request access to documents related to “*correspondence - including, but not limited to, letters, e-mails, and any attachments between the DG HOME and the International Centre for Migration Policy (ICMPD) since 2016 until now*”.

We have identified the following 18 documents as falling within the scope of your request:

- A letter addressed to the EC, for a meeting request with ICMPD Director General – March 2018, Ares(2022)5128185;
- ICMPD input to the Targeted Consultation document towards the new EU strategy addressing trafficking in human beings – July 2020, Ares(2022)5128119;
- ICMPD feedback to roadmap on the revision of the EU Directive 2011/36 – September 2021, Ares(2022)2140525;

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<sup>1</sup> GESTDEM 2022/2672.

- ICMPD contribution to the public consultation on the revision of the EU Anti-Trafficking Directive – March 2022 (2 documents):
  - o “ICMPD Contribution to the Public Consultation on the revision of the EU Anti-Trafficking Directive”, Ares(2022)2140525;
  - o “Feedback from: ICMPD”, Ares(2022)5128005;
- Email exchanges on ICAT Joint Submission to the Public consultation on the Anti-Trafficking Directive – March 2022, Ares(2022)5128064;
- Complete MPF Steering Committee minutes since 2016 (12 documents):
  - o 1<sup>st</sup> Meeting: Ares(2022)4695491,
  - o 2<sup>nd</sup> Meeting: Ares(2022)4694768,
  - o 3<sup>rd</sup> Meeting: Ares(2022)4694904,
  - o 4<sup>th</sup> Meeting: Ares(2022)4694964,
  - o 5<sup>th</sup> Meeting: Ares(2022)4695064,
  - o 6<sup>th</sup> Meeting: Ares(2022)4695112,
  - o 7<sup>th</sup> Meeting: Ares(2022)4695151,
  - o 8<sup>th</sup> Meeting: Ares(2022)4695430,
  - o 9<sup>th</sup> Meeting: Ares(2022)4695255,
  - o 10<sup>th</sup> Meeting: Ares(2022)4695297,
  - o 11<sup>th</sup> Meeting: Ares(2022)4695334,
  - o 12<sup>th</sup> Meeting: Ares(2022)4695389.

Having examined the documents requested under the provisions of Regulation 1049/2001, I have come to the conclusion that the requested documents should be disclosed. However, a complete disclosure of the identified documents 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, because they contain the following personal data:

- the names and initials and contact information of Commission staff members not pertaining to the senior management;
- the names and initials and contact details of other natural persons;
- handwritten signatures signatures of natural persons;
- other information relating to an identified or identifiable natural person.

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

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 from their reuse.

In case you would 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 within 15 working days upon receipt of this letter to the Secretariat-General of the Commission at the following address:

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](mailto:sg-acc-doc@ec.europa.eu)

Yours faithfully,

