Council of the European Union

Brussels, 18 November 2024
(OR. en)

15822/24

INF 278
API 132

NOTE

From:	General Secretariat of the Council
To:	Delegations
Subject:	Public access to documents - Confirmatory application No 29/c/01/24

Delegations will find attached:

- the request for access to documents sent to the General Secretariat of the Council on 25 September 2024 and registered on the same day (Annex 1);
- the reply from the General Secretariat of the Council dated 11 November 2024 (Annex 2);
- the confirmatory application dated 16 November 2024 and registered on 18 November 2024 (Annex 3).

ANNEX 1

[E-mail message sent to access@consilium.europa.eu **on Wednesday 25 September 2024, 03:51]**

From: **DELETED**
Sent: wednesday, September 25, 2024 3:51 AM
To: TRANSPARENCY Access to documents (COMM) <Access@consilium.europa.eu>
Subject: access to documents request - Opinions of the 255 Committee on the suitability of the candidates for the CJEU

Dear Council of the European Union,

It has become publicly known, through a variety of media sources – including the Portuguese Observador and specialised media, such as EU Law Live Blog – that some candidates for the post of Judge or Advocate General at the Court of Justice of the European Union have failed to receive a favourable opinion on account of not having the required number of years for demonstrating the professional experience. As this requirement is not laid down in any legal act (Articles 253 and 254 TFEU do not define the number of years required to be eligible to the post) or vacancy notice, there are concerns in the academic and professional communities regarding the discretionary power exercised by the panel provided for by Article 255 of the TFEU.

As a law professor, and a EU citizen, I find that it would be in the public interest to make both favourable and unfavourable opinions publicly available so that no doubt can be made on the impartiality of the Article 255 panel. This appears all the more needed at the time in which leading academic observers, such as Giuliano Amato, Dieter Grimm, Joseph Weiler, Miguel Maduro, Marta Cartabia and others have argued that the panel might have been acting ultra vires.

Therefore, under the right of access to documents in the EU treaties - as developed in Regulation 1049/2001 -, I hereby seek access to all the Article 255 Panel's opinions regarding all judicial candidates nominated for the CJEU and General Court in 2023 and 2024.

I note that while I am interested in receiving both the favourable and unfavourable opinions, be them in their entirety – and/or excluding some aspects of the substantive evaluations – , I am particularly interested in gaining access to the unfavourable opinions.

Contrary to what it might appear prima facie, the current lack of publicity of these opinions – and not their proactive publication – is currently damaging the reputation of the candidates presumed to have received an unfavourable opinion, as the current public debate – see above – shows.

By preventing the public from knowing for what reasons a particular candidate has failed to receive a positive assessment by the panel, the lack of publication of unfavourable opinions is prone to speculation, chattering, and manipulation. Virtually no observer belonging to the EU legal epistemic community – who is by nature the most merciless in judging the candidate and prone to speculating about the reasons for her/his failure – is currently unaware of the outcome and presumed reasons that have led to a negative opinion. One may therefore contend that the current policy seems more effective in protecting the panels' operation from public scrutiny than the candidates' reputation.

This hints to the transformation of the 255 panel into a de facto council of the judiciary in the EU, which has contributed to rewrite not only the national procedures for the selection of the candidates but also the substantive criteria, thus acting beyond Treaty law.

Ultimately, granting access to the committee's opinions might be the best way to protect the legitimacy of the 255 committee as well as to defend the reputation of both its members and the candidates the committee was called upon to examine.

Should I not receive the satisfaction of my request, I intend to complain to the EU Ombudsman alleging maladministration by both the 255 Committee and the Council.

Should the request be voluminous, particularly in light of the possible need to redact information from the documents, I am at your disposition to discuss narrowing the request.

Please do not hesitate to contact me should any further clarification be needed.

With best regards,

Yours faithfully,

DELETED

Sources cited:

https://observador.pt/opiniao/declaracao-de-interesses-2/

https://eulawlive.com/op-ed-selecting-eu-judges-the-role-of-the-255-committee-according-to-the-treaty/

https://eulawlive.com/who-will-judge-the-judges-who-judge-the-judges-the-curious-case-of-goncalo-manoel-de-vilhena-de-almeida-ribeiro-by-joseph-h-h-weiler/

Council of the European Union
General Secretariat
Directorate-General Communication and Information - COMM
Directorate Information and Outreach
Information Services Unit / Transparency
Head of Unit

Brussels, 11 November 2024

DELETED
Email: **DELETED**

Ref. 24/2477

Request made on: 25.09.2024
Dedline extension: 16.10.2024

Dear **DELETED**,

Thank you for your request for access to "*all the Article 255 Panel's opinions regarding all judicial candidates nominated for the CJEU and General Court in 2023 and 2024*".[1]

The General Secretariat of the Council considers that the requested documents fall within the remit of the exceptions relating to the protection of the public interest as regards privacy and the integrity of the individual (Article 4(1)(b) of Regulation (EC) No 1049/2001), the protection of the decision-making process (Article 4(3) of Regulation (EC) No 1049/2001), the protection of court proceedings (Article 4(2) second indent of Regulation (EC) No 1049/2001) and the protection of commercial interests (first indent of Article 4(2) of Regulation (EC) No 1049/2001).

At the outset, it must be noted that this approach is consistent with the conclusion of the European Ombudsman in her decision in case 1955/2017/THH on the Council of the European Union's refusal to grant public access to opinions evaluating the merits of candidates for appointment to the Court of Justice and the General Court of the European Union. In that decision, the European Ombudsman found that '*the overriding public interest in this case lies in protecting the Panel's*

[1] The General Secretariat of the Council has examined your request on the basis of the applicable rules: Regulation (EC) No 1049/2001 of the European Parliament and of the Council regarding public access to European Parliament, Council and Commission documents (OJ L 145, 31.5.2001, p. 43) and the specific provisions concerning public access to Council documents set out in Annex II to the Council's Rules of Procedure (Council Decision No 2009/937/EU, OJ L 325, 11.12.2009, p. 35).

decision-making process' and that '*this constitutes a greater public interest than that of the public knowing further details of the Panel's opinions*' and concluded that '*the refusal of the Council to provide full public access to the opinions of the Panel on judicial appointments was justifie*d'[2].

It should be also stressed that in its activity reports[3], the panel provided for in Article 255 TFEU ("the Panel") has stated that it considers that the disclosure of its opinions – which pertain to an assessment of candidates' suitability to perform the duties of Judge and Advocate-General of the Court of Justice and the General Court, and therefore contain personal data – would be likely to undermine the privacy of the candidates (Article 4(1)(b) of Regulation (EC) No 1049/2001). The Panel is also of the opinion that the full disclosure of its opinions would undermine the aims and quality of the consultation and appointment procedures provided for in Articles 253 to 255 TFEU, notably because it would jeopardise the secrecy of the Panel's deliberations and of the intergovernmental conference at which Member States appoint the Judges and Advocates-General (Article 4(2) and (3) of Regulation (EC) No 1049/2001).

The Panel therefore considers, on the basis of these exceptions, that its opinions are intended exclusively for Member State governments and that the positions it takes on the suitability of candidates for judicial office at European Union level may not be disclosed to the public, either directly or indirectly.

Taking into account the above considerations, the General Secretariat of the Council is of the view that providing access to the requested documents would jeopardise the attainment of the objectives of Regulation (EC) 1049/2001 for the reasons set out below.

First, the requested documents contain, in most of their parts, personal data pertaining to the candidates to whom they refer.

According to Article 3(1) of 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 ("Regulation (EU) 2018/1725"), personal data is defined as '*any information relating to an identified or identifiable natural person*'. Moreover, the Court of Justice has ruled that professional data or information provided as part of a professional activity must also be characterised as personal data[4], and that the fact that certain information has already been made public does not preclude its characterisation as personal data[5].

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2 Decision in case 1955/2017/THH on the Council of the European Union's refusal to grant public access to opinions evaluating the merits of candidates for appointment to the Court of Justice and the General Court of the European Union, paragraphs 54 and 56.

3 Seventh Activity Report of the panel provided for by Article 255 of the Treaty on the Functioning of the European Union, page 16, available at: https://curia.europa.eu/jcms/upload/docs/application/pdf/2022-07/2022.2597-qcar22002enn_002.pdf.

4 Judgment of 29 June 2010, Commission v Bavarian Lager, C-28/08, EU:C:2010:378, paragraphs 66 to 76.

5 Judgment of 16 December 2008, Tietosuojavaltuutettu v Satakunnan Markkinapörssi and Satamedia, C-73/07, EU:C:2008:727, paragraphs 48 and 49.

Thus, both the factual elements concerning the candidates' professional experience and qualifications and the panel's assessment of the candidates' competences are to be classified as personal data.

Such data come under the exception provided for in point (b) of Article 4(1) of Regulation (EC) No 1049/2001 (protection of the privacy and the integrity of the individual).

According to established case-law, where an applicant seeks to obtain access to a document that includes personal data, the legal framework on the protection of individuals with regard to the processing of personal data by the European institutions becomes applicable in its entirety. More specifically, according to Article 9 of Regulation (EU) 2018/1725, '*personal data shall only be transmitted to recipients established in the Union other than Union institutions and bodies if:*
[…]
(b) the recipient establishes that it is necessary to have the data transmitted for a specific purpose in the public interest and the controller, where there is any reason to assume that the data subject's legitimate interests might be prejudiced, establishes that it is proportionate to transmit the personal data for that specific purpose after having demonstrably weighed the various competing interests.
[…]
3. Union institutions and bodies shall reconcile the right to the protection of personal data with the right of access to documents in accordance with Union law.'

It follows from this provision that it is up to the applicant to show whether the transfer of the requested personal data is necessary – that is to say, whether it is the most appropriate measure to achieve the objective pursued by the applicant and if it is proportionate to that objective. However, such a disclosure should not prejudice disproportionally the legitimate interests of the individual or individuals concerned.

In the case at hand, on the one hand, the necessity of the transfer of the requested personal data has not been established in the application. Indeed, the applicant has simply referred to general considerations regarding the necessity to release those documents, arguing that "the lack of publication of unfavourable opinions is prone to speculation, chattering, and manipulation" and "is currently damaging the reputation of the candidates presumed to have received an unfavourable opinion". The applicant therefore takes the view that "the current policy seems more effective in protecting the panels' operation from public scrutiny than the candidates' reputation", while advocating for making "both favourable and unfavourable opinions publicly available so that no doubt can be made on the impartiality" of the panel; such disclosure "might be the best way to protect [its] legitimacy".

On the other hand, the disclosure of the requested personal data could, contrary to what the applicant contends, cause harm to the reputation of the candidates and therefore would prejudice their legitimate interests.

The demanding professional requirements associated with the post of Judge usually attract individuals of a particularly high seniority and who often hold prominent positions, both at national and EU level, such as judges in the highest courts or renowned professors. The reputation of individuals in such positions would inevitably suffer greater damage should negative opinions concerning them be made public. Such damage could even have an effect on their potential career prospects, at both national and international level, even if the opinion of the Panel is on the suitability of the candidate specifically to perform the functions of a Judge or Advocate-General of the Court of Justice or the General Court.

Under these circumstances, providing access to the parts of the opinions concerning the assessment of the suitability of the candidates to perform the duties of a Judge or Advocate-General of the Court of Justice or Judge of the General Court would not only jeopardise the attainment of the objectives of point (b) of Article 4(1) of Regulation (EC) No 1049/2001, but would also be in breach of Regulation (EU) 2018/1725 on the protection of personal data.

In addition, it is stressed that the automatic prevalence of the principle of transparency over data protection has been expressly ruled out by the Court. Indeed, Regulation (EC) No 1049/2001 only provides a right of public access to the extent that none of the exceptions provided by the said Regulation applies.

In any case, should the necessity of transfer be justified by the objective to ensure public trust in the EU courts and more specifically to allow public control over the competence and qualifications of the members of the EU judicature, these are exactly the objectives that led to the establishment of the Panel in the first place and that form the basis of the Panel's operating rules, which provide for the confidentiality of its activities. In that regard, it is noted that if transparency is crucial to allow the citizens to hold political decision-makers accountable and therefore to strengthen the democratic legitimacy of the EU institutions that are representative in nature, it plays a very different role in relation to the EU judiciary. The legitimacy of the Judges is first and foremost assured by their independence, objectivity and professional competence, not by the power of public opinion. It is not for members of the public to assess the suitability of candidates to the post of Judge or Advocate-General.

In this context, the disclosure of personal data would, for the reasons that will be set out below, risk compromising the effective selection of suitable candidates for the posts of Judges and Advocates-General and would therefore undermine, rather than pursue, the objective of ensuring the public's trust in the EU courts.

In any event, the panel already publishes detailed reports of its activities, which provide an accurate account of its working methods and of the criteria used to assess the candidates. In particular, the reports contain exhaustive statistical data from the period of reference on the number of panel meetings held and the time taken to assess candidates, the number of candidates assessed, and the nature of the opinions delivered, whether favourable or otherwise, as well as the outcome of the opinions. They further elaborate *in extenso* on the procedures followed for

assessing candidates proposed for renewal of their term of office or for a first term of office, the comprehensive information required of the governments and the candidates, and the criteria used for the assessment of the candidates' suitability, on the basis of six considerations: the candidates' legal capabilities; their professional experience; their ability to perform the duties of a Judge; their language skills; their ability to work as part of a team in an international environment in which several legal systems are represented; and whether their independence, impartiality, probity and integrity are beyond doubt. Regarding specifically candidates for a first term of office, the government concerned is requested to provide the essential reasons which led it to propose the candidate and any information on the national procedure that led to the candidate being selected, if there was one, while the candidate is asked for a letter explaining their reasons for applying, a CV in the harmonised format defined by the panel, the text of one to three recent publications of which the candidate is the author, and a presentation of one to three complex legal cases which the candidate has handled in their professional practice. In addition, such candidates are heard by the panel, the purpose of the hearings being to supplement the assessment of the content of the file. This information suffices to reassure the public on the fairness of the selection procedure and to guarantee that the best candidates will be retained. While the applicant appears to nurture doubts in this regard, he has failed to show why the significant transfer of personal data that its application requires would be the only appropriate measure to achieve the objective pursued.

Secondly, disclosure of the requested documents would seriously undermine the decision-making process leading to the appointment of Judges.

The publication of the Panel's opinions would affect the confidentiality of the procedure for assessing the suitability of the candidates. In that regard, it should be recalled that the principle of secrecy regarding assessment bodies' proceedings is widely acknowledged in EU law and finds its justification in the need to guarantee the independence of the assessment bodies and the objectivity of their proceedings, by protecting them from all external interference and pressures. This rationale applies, of course, all the more to the Panel provided for in Article 255 TFEU.

In the case of the Panel, the principle of confidentiality has been expressly enshrined in the Panel's operating rules, which set out a number of specific provisions concerning the arrangements for holding panel meetings and a specific system of circulation of and access to documents. Needless to say, those rules have to be coordinated with the provisions of Regulation (EC) No 1049/2001.

According to well-established case-law, when potential conflict exists between the provisions of Regulation (EC) No 1049/2001 and a specific set of rules regulating the circulation of and access to documents in the framework of a specific procedure, the conflict has to be solved by interpreting the exception provided for in Regulation (EC) No 1049/2001 in line with those rules. This ensures that the procedure to which those rules apply operates correctly and guarantees that its objectives are not jeopardised.

Typically, this coordination is carried out by the recognition of a general presumption. Such a presumption is based on the fact that access to a document involved in the relevant procedure would be incompatible with the proper conduct of that procedure and aims to ensure the integrity of that procedure by limiting the intervention of third parties.
In the present situation, there is no doubt that the disclosure of the requested documents would undermine the conduct of the selection procedure, and notably its confidential nature, as expressly provided for in the Panel's operating rules. It follows that, in line with the case-law of the EU courts[6], the documents are covered by a general presumption according to which the disclosure of the Panel's opinions would, as a matter of principle, seriously undermine the Panel's decision-making process.

But even if the existence of a general presumption was put in question, the serious risk for the decision-making process leading to the appointment of members of the EU judicature results from a number of circumstances.

To start with, a number of the considerations mentioned above in relation to the prejudice to the candidates' reputation have broader systemic implications for the correct functioning of the selection procedure for Judges and Advocates-General.

Disclosure of an opinion, be it unfavourable or favourable, could dissuade future qualified candidates from applying, for fear of any possible negative impact that the Panel's opinions could have on their reputation.

This 'chilling effect' is linked to the fact that potential candidates are usually individuals of particularly high seniority and visibility at national level, who could be deterred from participating in the selection procedure if their reputation might be put at risk.

Furthermore, disclosure of its opinions would affect the working methods of the Panel. In particular, the Panel could become more restrained and more guarded when drafting its written opinions. This would be unfortunate, firstly because it would greatly reduce the usefulness of the Panel's opinions, with the effect of rendering more difficult the work of the intergovernmental conference which is called to appoint Judges and Advocates-General. It could also cause the panel to decide to have more systematic recourse to the possibility, provided for in its operating rules, to present its opinions to the intergovernmental conference orally.

As mentioned above, the Panel provides its opinions to an intergovernmental conference composed of representatives of the Member States that appoint the Judges and Advocates-General by common accord. Disclosure of the opinions of the panel would inevitably attract the attention of the public and possibly the media towards the assessment of the candidates. This in turn could lead to a politicisation of the issue and the adoption of politically postured positions, thereby significantly reducing Member States' margin for manoeuvre in the deliberations relevant

[6] See, for example, judgment of 12 November 2015, *Alexandrou* v *Commission,* T-515/14 P and T-516/14 P, EU:T:2015:844, paragraph 88 and following.

for the adoption of a decision by common accord. In the framework of a political discussion on the appointments, the heretofore much-respected opinion of the Panel could be called into question in light of considerations of a political nature, which would ultimately affect the quality of the selection of Judges and Advocates-General.
For all the reasons stated above, disclosure of the requested opinion would undermine the decision-making process leading to the appointment of Judges and Advocates-General, and therefore would jeopardise the attainment of the objectives of Article 4(3) of Regulation (EC) No 1049/2001.

Thirdly, full disclosure of the Panel's positive opinions could seriously undermine the protection of court proceedings. Indeed, it cannot be excluded that positive opinions may contain remarks or observations or point out less solid elements in the candidate's qualifications or profile. If disclosed, that assessment could become the topic of a public debate and cast a shadow on the profile of serving judges of the EU jurisdictions. Depending on the type of observations made in the positive opinion, the image of knowledge, expertise, objectivity, or effectiveness of the Judge concerned may be undermined or put in question in the public debate. This would in turn affect the reputation of the Court as a whole in the eyes of the public, and even provoke requests or criticisms by the party to the proceedings. In short, it could create difficulties for the orderly and serene conduct of court proceedings.

Lastly, full disclosure of the requested documents could undermine the protection of the candidates' commercial interests, in the event that the candidates were to carry out paid work as lawyers or legal advisers.

While an opinion of the Panel concerns the suitability of a candidate for a specific position, the fact remains that the evaluation carried out by the Panel takes into account the file submitted by the candidate, his academic record, his professional experience and his performance at interview. All this information would be relevant for any other position, in either the public or the private sector, for which the candidate might later be considered since it shows the capabilities of the candidate as a legal professional. Therefore, it cannot be denied that the disclosure of, in particular, an unfavourable opinion could have a negative impact on the candidate's chances of succeeding in other selection procedures.

Consequently, disclosure of the opinions of the panel would jeopardise the attainment of the objectives of Article 4(2) of Regulation (EC) No 1049/2001.

As regards the existence of an overriding public interest in disclosure, on balance, the principle of transparency which underpins Regulation (EC) No 1049/2001 would not, in this case, prevail over the abovementioned interests protected under the exceptions laid down in Article 4(2) and (3) of Regulation (EC) No 1049/2001 in such a way as to justify disclosure of the documents.

It must be acknowledged that transparency – and more specifically legislative transparency – plays a crucial role in the correct functioning of the EU democratic system, enshrined as it is in the Treaties, secondary legislation and the relevant case-law.

However, as indicated above, it must be underlined that in a democratic society, transparency and public participation do not have the same role in relation to legislative activity and the role of the judiciary.
Magistrates are not accountable to the public at large; they are subject only to the law. Their position cannot be compared to that of politicians or citizens' representatives. As a consequence, the procedure for their appointment needs to strike a balance between the need to select the candidates with the best legal expertise, the greatest professional experience and the most reliable guarantees of objectivity, and the principle of transparency.

In the case at hand, such a balance is satisfied by the significant level of transparency that is already assured by the Panel's periodic publication of detailed activity reports, which, as explained above, provide information about its working methods, its criteria for assessing candidates and its overall yearly activity.

However, when it comes to the publication of individual opinions on the suitability of candidates for the post of Judge or Advocate-General, on balance, the public interest in having access to those opinions does not override the interests in the protection of the decision-making process, court proceedings and the commercial interest of the candidate.

In light of the above, the General Secretariat of the Council concludes that full disclosure of the requested documents would jeopardise the attainment of the objectives of Regulation (EC) No 1049/2001. The possibility of partially disclosing the opinions concerned by your request in accordance with Article 4(6) of Regulation (EC) No 1049/2001 has also been examined. Partial access could be granted to those parts of the requested documents which are not covered by the aforementioned exceptions provided for in Article 4 of Regulation (EC) No 1049/2001.

Thus, a redacted version of five opinions issued by the Panel in 2023 and 2024 by way of a sample (reflecting the parts to which partial access is granted) is attached.

You can ask the Council to review this decision within 15 working days of receiving this reply (confirmatory application).

Yours sincerely,

Fernando FLORINDO

Enclosures: 5

ANNEX 3

[E-mail message sent to access@consilium.europa.eu **on Saturday, 16 November 2024, 00:40]**

From: DELETED
Sent: Saturday, November 16, 2024 12:40 AM
To: TRANSPARENCY Access to documents (COMM) <Access@consilium.europa.eu>
Subject Internal review of access to documents request - Opinions of the 255 Committee on the suitability of the candidates for the CJEU

Dear Council of the European Union,

Please pass this on to the person who reviews confirmatory applications.

I am filing the following confirmatory application with regards to my access to documents request 'Opinions of the 255 Committee on the suitability of the candidates for the CJEU'.

As anticipated in my original request, which has now been refused, there are concerns in the academic and professional communities regarding the discretionary power exercised by the panel provided for by Article 255 of the TFEU, as epitomised by its zero publicity policy regarding its opinions on the suitability of the candidates for members of the CJEU, and established within the Council.

As a law professor, and a EU citizen, I find that it would be in the public interest to make both favourable and unfavourable opinions publicly available so that no doubt can be made on the impartiality of the Article 255 panel. This appears all the more needed at the time in which leading academic observers, such as Giuliano Amato, Dieter Grimm, Joseph Weiler, Miguel Maduro, Marta Cartabia and others have argued that the panel might have been acting ultra vires over the past years.

Therefore, under the right of access to documents in the EU treaties - as developed in Regulation 1049/2001 -, I hereby seek - through this confirmatory request - access to all the Article 255 Panel's opinions regarding all judicial candidates nominated for the CJEU and General Court in 2023 and 2024.

I note that while I am interested in receiving both the favourable and unfavourable opinions, be them in their entirety – and/or excluding some aspects of the substantive evaluations – , I am particularly interested in gaining access to the unfavourable opinions.

Contrary to what is argued in your rejection letter, it is the current absolute confidentiality of these opinions – and not their proactive publication – that is currently damaging the reputation of the candidates presumed to have received an unfavourable opinion, as the current public debate revolving around the failed appointment of several candidate members shows.

By preventing the public from knowing for what reasons a particular candidate has failed to receive a positive assessment by the panel, the lack of publication of unfavourable opinions is prone to speculation, chattering, and manipulation. Virtually no observer belonging to the EU legal epistemic community – who is by nature the most merciless in judging the candidate and prone to speculating about the reasons for her/his failure – is currently unaware of the outcome and presumed reasons that have led to a negative opinion. One may therefore contend that the current policy seems more effective in protecting the panels' operation from public scrutiny than the candidates' reputation.

This hints to the transformation of the 255 panel into a de facto council of the judiciary in the EU, which has contributed to rewrite not only the national procedures for the selection of the candidates but also the substantive criteria, thus acting beyond Treaty law.

Ultimately, granting access to the committee's opinions might be the best way to protect the legitimacy of the 255 committee as well as to defend the reputation of both its members and the candidates the committee was called upon to examine.

Should I not receive the satisfaction of my request, I intend to complain to the EU Ombudsman alleging maladministration by both the 255 Committee and the Council, and, subsquentely or alternatively, challenge your rejection before the CJEU.

Should the request be voluminous, particularly in light of the possible need to redact information from the documents, I am at your disposition to discuss narrowing the request.

Please do not hesitate to contact me should any further clarification be needed.

With best regards,

Yours faithfully,

DELETED

A full history of my request and all correspondence is available on the Internet at this address: https://www.asktheeu.org/en/request/opinions_of_the_255_committee_on