



**Pesticide
Action
Network**
Europe

PAN-Europe, Request for
access to documents

Brussels, 13-11-2018

Contact: H.Muileman,
tel.0031655807255

DG Research
Commissioner Moedas
Brussels
cab-moedas-contact@ec.europa.eu

Concerning: Request for access to documents.

Dear Commissioner, on August 24, 2018 we requested to receive documents from you, a request which you registered as 2018/4600. By asking a clarification on August 31, 2018 you in fact postponed delivery of the documents and started registering again on September 7, 2018. This time you mentioned that *“Your application concerns a very large number of documents, which need to be assessed individually...”* and asked for the objective of the request and further to narrow down the request. You state: *“The handling of your request will be broken down as follows: identification of the documents falling under your request; retrieval and establishment of a complete list of the identified documents; scanning of the documents not electronically available (if any); assessment of the content of the documents in light of the exceptions provided by Art 4 of the Regulation; third-party consultations under Art 4(4) of the Regulation; final assessment of the documents in light of the received comments; redaction of those parts of the documents to which one or several exceptions apply; drafting of the reply; internal approval of the draft decision on your request. It follows that the documents falling within the scope of your request could not possibly be dealt with within the extended deadline of 30 working days counting from the date of receipt of your clarifications, 7/9/2018”*.

We did a proposal for a fair solution to limit your workload on September 20, 2018 but this proposal was turned down by you on September 27, 2018 with the argument that you need to respect the legal deadline but without giving any insight on how you will proceed. On October 22, 2018, we received a message from you that you wouldn't respect the legal deadline of October 19, 2018. And on November 12, 2018, well after the legal deadline, we received nothing, no document at all. Nothing!

It occurs to us that you are playing a game with us. First you state that it is about a “very large number of documents” and finally, after 2.5 months and well after the legal deadline, there appears to be no document at all. There is little doubt that you are violating our rights to receive documents and that you engage in wasting our time with misleading messages. We once again, ask you to hand over the documents we requested in our original request from August 24, 2108 (see below), while we will also consider involving all legal means we have if you continue violating our rights.

Documents requested:

1. All documents mentioning the need to start this research programme (SAPEA) and internal communications on the start of this research programme;
2. The documents regarding the process of decision-making and granting of the SAPEA programme to the applicant, the research requested, the offer of the applicant, the decision of EU Commission including all conditions;
3. All documents regarding the structure of the programme, organisational chart, the names of researchers, names of advisors, names of experts added, names of directors and managers, names of people in advisory committees or other committees involved in the research, including all experts and attendants present at meetings and congresses;
4. All documents produced as part of the programme, (draft) planning, (draft) outcome, workshops, meetings including meeting attendants, articles, links with other research programmes;
5. All declarations of interest of all experts and scientists involved in this programme, including experts invited by the Commission to participate in the work of the Group of Chief Scientific Advisors;
6. All documents on the financial contribution of stakeholders to the program SAPEA.

Yours sincerely,

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke extending to the right.

Pesticide Action Network,
H.Muilerman