

Brussels, 24 July 2026  
(OR. en)

12207/26

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INF 228

**NOTE**

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| From:    | General Secretariat of the Council                                                               |
| To:      | Delegations                                                                                      |
| Subject: | Public access to documents - Confirmatory application N° 42/c/01/26 - Information to delegations |

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Delegations will find attached:

- the request for access to documents sent to the General Secretariat of the Council on 11 June 2026 and registered on the same day (Annex 1);
- the reply from the General Secretariat of the Council dated 24 July 2026 (Annex 2);
- the confirmatory application dated 24 July 2026 and registered on the same day (Annex 3).

From: **DELETED**

Sent: Thursday, June 11, 2026 6:38 AM

To: TRANSPARENCY Access to documents (COMM) <Access@consilium.europa.eu>

Subject: access to documents request - Request for access to documents – objection to Bulgarian “Bulgarian Alphabet” €2 commemorative coin (ST 9874 2026 INIT)

Dear Council of the European Union,

Under the right of access to documents in the EU treaties, as developed in Regulation 1049/2001, I am requesting documents which contain the following information:

I would like to receive:

The information note ST 9874 2026 INIT concerning the objection by a euro-area Member State to Bulgaria’s planned €2 commemorative coin “The Bulgarian Alphabet”, including any later revised versions.

The reasoned opinion(s) submitted by Member State(s) under Article 10(4) of Council Regulation (EU) No 729/2014 regarding the draft design of this coin, plus any cover letters or emails transmitting them to the Council or the General Secretariat.

Any minutes, summary records or “outcome of proceedings” of Council preparatory bodies (including working parties and COREPER) where this objection is explicitly discussed.

If full access cannot be granted, please provide partial access to the rest of the documents in line with Article 4(6) of Regulation 1049/2001. I would prefer to receive the documents in electronic form by email.

Yours faithfully,

**DELETED**

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**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, 24 July 2026

**DELETED**

E-mail: **DELETED**

Ref. 26/2202

Request made on: 10.06.2026

Deadline extension: 02.07.2026

Dear **DELETED**,

Thank you for your request for access to documents of the Council of the European Union.<sup>1</sup>

Please find attached a partially accessible version of document 9874/26.<sup>2</sup> However, I regret to inform you that full access cannot be given for the reasons set out below.

Document **9874/26** is an information note dated 29 May 2026 concerning an objection to a draft design of a commemorative 2-euro coin.

It contains a letter and the information on the objecting Member State concerning the objection to the submission by Bulgaria of a 2-euro commemorative coin commemorating the Bulgarian alphabet. The letter is a third-party document emanating from a Member State and therefore shall

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<sup>1</sup> 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).

<sup>2</sup> Article 4(6) of Regulation (EC) No 1049/2001.

not be released against the explicit opposition of that Member State.<sup>3</sup> The Member State concerned has objected to the disclosure of its letter at this stage of the ongoing procedure.

After carefully considering all the principles related to this request, the General Secretariat of the Council concludes that it has to refuse access to the letter and the information on the Member State concerned at this stage, as such disclosure would seriously undermine the very delicate decision-making process that thus continues, without there being any evidence of an overriding public interest in release,<sup>4</sup> and also because it would undermine the protection of the public interest as regards monetary policy.<sup>5</sup>

Please note that the reasoned opinion submitted by the objecting Member State is contained in the annex to that document.

Furthermore, no other documents covered by your request are currently held by the Council. In particular, there have at this stage been no meetings of the Council or its preparatory bodies where the issue would have been on the agenda.

Pursuant to Article 7(2) of Regulation (EC) No 1049/2001, you may ask the Council to review this decision within 15 working days of receiving this reply. Should you see the need for such a review, you are invited to indicate the reasons thereof.

Yours sincerely,

Fernando FLORINDO

Enclosure

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<sup>3</sup> Article 4(5) of Regulation (EC) No 1049/2001.

<sup>4</sup> Article 4(3), first subparagraph, of Regulation (EC) No 1049/2001.

<sup>5</sup> Article 4(1)(a), fourth indent, of Regulation (EC) No 1049/2001.

From: **DELETED**

Sent: Friday, July 24, 2026 11:30 AM

To: TRANSPARENCY Access to documents (COMM) <Access@consilium.europa.eu>

Subject: Internal review of access to documents request - Request for access to documents – objection to Bulgarian “Bulgarian Alphabet” €2 commemorative coin (ST 9874 2026 INIT)

Dear

Partial disclosure: I ask that 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 'Request for access to documents – objection to Bulgarian “Bulgarian Alphabet” €2 commemorative coin (ST 9874 2026 INIT)'.

I refer to your letter of 24 July 2026 (Ref. 26/2202), in which the General Secretariat of the Council granted partial access to document 9874/26 but refused disclosure of the letter and identity of the objecting Member State, citing Article 4(5) (third-party objection) and Article 4(3) (protection of an ongoing decision-making process) of Regulation (EC) No 1049/2001.

Pursuant to Article 7(2) of Regulation (EC) No 1049/2001, I hereby request a review of this decision, on the following grounds:

Overriding public interest in disclosure: The identity of the objecting Member State and its stated reasons are already the subject of widespread public reporting in Bulgarian and international media, citing diplomatic sources naming Greece as the objecting party, allegedly due to concerns over the term "Bulgarian alphabet" as opposed to "Cyrillic script." Given that this information already circulates publicly without official confirmation, there is a strong public interest in transparency and in enabling verification of accurate versus speculative reporting, which continued redaction does not serve.

Proportionality of continued withholding: Since the substance of the objection is already known to the public through media coverage, withholding formal confirmation no longer meaningfully protects the "delicate decision-making process" claimed, and instead undermines public trust in the Council's transparency obligations., at minimum, the Council reconsider partial access under Article 4(6), disclosing the identity of the objecting Member State while withholding any genuinely sensitive diplomatic correspondence, if such distinction is feasible.

I would be grateful for confirmation of receipt and for the Council's response within the statutory timeframe.

A full history of my request and all correspondence is available on the Internet at this address: **DELETED**

Yours faithfully,

**DELETED**