

## **Open Letter re future European Convention on Access to Official Documents**

5 October 2007

To:  
Group of Specialists on Access to Official Documents  
Ms. Helena Jäderblom, Chair  
c/o Council of Europe  
67075 Strasbourg  
France

cc:  
Steering Committee on Human Rights (CDDH)  
Mr. Roeland BÖCKER, Chair

Madame Chair, Sirs:

We, the undersigned, write to express our serious concern that the current draft of the future European Convention on Access to Official Documents is defining the right of access to information in a way that, in certain important respects, falls below prevailing European and international standards.

We are gravely concerned that if adopted as it stands, the European Convention on Access to Official Documents will legitimise legislation which lacks important safeguards that are currently found in many domestic access to information laws, thereby flying in the face of the enormous progress made in the past several years, notably the adoption since 1992 of access to information laws in all 20 formerly communist Council of Europe member states, as well as new laws in countries such as the UK and Germany, and modifications to constitutions and statutes in a number of other states. The Council of Europe contributed to these significant advances, including through its Recommendation 2002(2) on Access to Official Documents, and we believe that the only appropriate role for the Council of Europe is to continue setting standards by adopting a treaty that enshrines a core right to information as currently established at the national level in Europe and globally.

We note that the right to information has been confirmed as a basic human right in national constitutions and jurisprudence as well as by the specialised mandates on freedom of expression of the United Nations, the Organization for Security and Co-operation in Europe, and the Organization of American States<sup>1</sup>. In September 2006 the right to information was affirmed as a fundamental human right by the Inter-American Court of Human Rights.

We recognise and welcome the fact that the draft Convention has a number of positive features, including recognition of a right to request "official documents", which are broadly defined as all information held by public authorities, in any form. It is also welcome that the draft Convention clearly establishes that the right can be exercised by all persons with no need to demonstrate a particular interest in the information requested, and at no charge for filing requests and viewing

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<sup>1</sup> See Declaration of 6 December 2004 by the UN Special Rapporteur on Freedom of Opinion and Expression, the OSCE Representative on Freedom of the Media and the OAS Special Rapporteur on Freedom of Expression at <http://www.cidh.org/Relatoria/showarticle.asp?artID=319&IID=1>

documents. These positive elements of the treaty do not, however, allay concerns that significant flaws in the current draft, if left unremedied, will undermine the value of the Convention.

For the undersigned civil society groups and individuals, the three most serious problems in the current draft of the Convention are:

1. Failure to include all official documents held by legislative bodies and judicial authorities within the mandatory scope of the treaty;
2. Failure to include official documents held by natural and legal persons insofar as they perform public functions within the mandatory scope of the treaty;
3. Failure to specify certain basic categories of official documents, such as those containing financial or procurement information, that must be published proactively.

It is our contention that the future Convention should reflect best practices which have gained broad acceptance across the Council of Europe's 47 member states, rather than merely the existing law and practice of the 15 member states represented in the Group of Specialists drafting the Convention. For example, in previous submissions to the Group of Specialists<sup>2</sup>, civil society groups have drawn attention to the fact that in the vast majority of Council of Europe member states, all branches of government, including the judicial and legislative branches, are required to provide access to information, either under a single law or separate legislation for each branch. There is no principled reason for treating legislative bodies or judicial authorities any differently than executive bodies under an access to information regime. Legislative bodies and judicial authorities perform public functions and are financed with public money; the rationales that call for transparency of the executive apply with equal, if not greater, force to the legislature and judiciary. It would be ironic, for example, to exclude from the scope of the treaty documents related to the law-making activities of national parliaments – the most quintessential exercise of representative democracy. Transparency of these institutions enables citizens to form opinions about their functioning, foster efficiency, reduce corruption and ultimately increase public confidence in them. Furthermore, the treaty's exemptions regime is perfectly capable of protecting any legitimate legislative or judicial privileges.

Similar rationales call for the inclusion of private entities that perform public functions within the mandatory scope of the treaty. In an era in which traditional public services – whether it be utilities, healthcare or military operations – are increasingly being outsourced to the private sector, this would be a glaring omission. It would also represent an unjustifiable lowering of the standards established by the Council of Europe's 2002 Recommendation, which covers "natural or legal persons insofar as they perform public functions." For these reasons, we find it unjustifiable that the future Convention proposes to limit the right to legislative and judicial bodies performing "administrative functions" or exercising "administrative authority" rather than including all information held by all branches of government. If the future Convention fails to reach this minimum standard, it will do a great disservice to the right of access to information to the extent that it will run counter to the Council of Europe's mandated role to promote democracy and protect human rights.

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<sup>2</sup> See *Briefing regarding the elaboration of a Council of Europe treaty on access to official documents*, submitted by Article 19, the Open Society Justice Initiative and Access Info Europe to the Group of Specialists in November 2006; see also *Briefing # 2 regarding the elaboration of a Council of Europe treaty on access to official documents*, submitted by Article 19, the Open Society Justice Initiative and Access Info Europe to the Group of Specialists in July 2007. Available at [www.access-info.org](http://www.access-info.org), [www.article19.org](http://www.article19.org) and [www.justiceinitiative.org](http://www.justiceinitiative.org).

With respect to proactive publication of information, we note that proactive publication rules are an essential component of any effective freedom of information regime and that many access to information laws contain detailed provisions on the information that must be disclosed without the need for a request, such as by placing it on a public body's website. Most non-experts will never make a request for an official document; in order to ensure the people are nevertheless able to form a view of the authorities and to engage in decision-making, information of general interest should be made available without the need for a request. To guarantee that this happens in practice, the Convention should identify those categories of information which must, at a minimum, be published proactively.

In addition to the three most serious problems highlighted above, other significant concerns with the current draft are:

4. Absence of a guarantee that individuals will have access to an appeals body which has the power to order public authorities to disclose official documents.
5. Absence of a guarantee that individuals will be able to appeal against violations of the right of access other than "denial" of a request (such as unjustified failures to provide access in a timely fashion or in the form preferred by the requester);
6. Lax drafting of exceptions that permit withholding of official documents under the internal deliberations and commercial interests exemptions:
  - a. There are no time limits on the application of the internal deliberations exemption; such documents may be withheld indefinitely, even after a decision on the matter has been taken;
  - b. The treaty should protect only "legitimate commercial interests," not all and any "commercial interests," as in the present draft.
7. Absence of a requirement that states set statutory maximum time-limits within which requests must be processed.

Of particular concern here is the issue of judicial protection of the right of access (point 4). The current draft of the Convention grants applicants whose request for information has been denied "access to a review procedure before a court of law or another independent and impartial body established by law." It fails to specify, however, that the non-judicial body of appeal should have the legal authority to order disclosure of official documents. Given that access to information is now recognised as a human right, as will be confirmed by this treaty, it is essential that the future Convention enshrine the principle of a right of appeal to an independent body (a judicial or equivalent body) that is empowered to protect the rights of individual requestors by ordering, when appropriate, the release of requested information. In the absence of such a guarantee, the applicant's theoretical right of access would be denied effective judicial protection – in violation of one of the basic principles of human rights law.

Last but not least, we note that the monitoring mechanism for the treaty will need to be robust and well-resourced if the Convention is to serve its intended purpose of upholding the right of access to information for the 800 million people in the Council of Europe region.

Since the Convention aims to ensure a minimum level of respect for the right of access to information, its drafters should avoid the pitfall that if one or two member states do not meet a

particular standard, the Convention will accommodate those states by lowering the bar—this would defeat the very purpose of this standard-setting effort. Rather, the core provisions of the Convention should be mandatory, and states whose legislation does not, at time of ratification, meet those minimum standards may, as a last resort, make declarations or reservations and notify the monitoring body when they have brought their legislation into line with the treaty.

We, the undersigned, call on the Group of Specialists to address the seven concerns identified above by making the following modifications to the draft Convention:

1. Include all official documents held by legislative bodies and judicial authorities, irrespective of their nature, within the mandatory scope of the treaty;
2. Include all documents held by natural and legal persons insofar as they perform public functions within the mandatory scope of the treaty, if necessary further defining the meaning of “public functions”;
3. Introduce a provision that requires regular, proactive publication of certain basic, specifically defined categories of official documents including information about the structure of each government body, personnel, activities, rules, guidance, decisions, and public procurement;<sup>3</sup>
4. Introduce a guarantee that individuals will have access, in all cases, to an appeals body with the power to order government agencies to disclose official documents and ensure compliance with the right of access;
5. Introduce language to the effect that in addition to a right to appeal against “a denial of a request”, individuals shall have the right to appeal all administrative actions or omissions that violate their right to information;
6. Redraft the exemptions relating to internal deliberations and commercial interests to ensure:
  - a. that there is a time limit on the applicability of the internal deliberations exemption (*i.e.* following the conclusion of internal deliberations on a matter or within a reasonable period thereafter);
  - b. that the treaty refers to legitimate commercial interests only;
7. Introduce a requirement that states set statutory maximum time-limits within which requests must be processed.

We believe that only if these concerns are addressed, will the future European Convention on Access to Official Documents enshrine the essential principles of the right of access to information.

**Signing Organizations**, with name of person signing on their behalf:

***International organizations:***

- |                       |                                                            |
|-----------------------|------------------------------------------------------------|
| 1. Helen Darbishire   | Access Info Europe (Madrid)                                |
| 2. Dr Agnès Callamard | Article 19 (London)                                        |
| 3. Sandra Coliver     | Open Society Justice Initiative (New York)                 |
| 4. Issa Luna Pla      | CETA (Centre for Study of Transparency and Access), Mexico |

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<sup>3</sup> List guided by the submission of the OSCE Representative on Freedom of the Media to the Group of Specialists.

5. Eduardo Bertoni  
Due Process of Law Foundation (Washington)
6. Gwen Hinze  
Electronic Frontier Foundation (Brussels, Toronto, San Francisco and Washington D.C)
7. Renate Schroeder  
European Federation of Journalists (Brussels)
8. Jack Thurston  
Farmsubsidy.org
9. Gavin Hayman  
Global Witness (London)
10. Rohan Jayasekera  
Index on Censorship (London)
11. Hernán Bonomo  
International Debate Education Association (IDEA, New York)
12. Claire Tixeire  
International Federation for Human Rights (FIDH, Paris)
13. Dr Aaron Rhodes  
International Helsinki Federation for Human Rights (IHF)
14. John West  
Internews Europe (Paris)
15. Milica Pesic  
Media Diversity Institute
16. Edwin Rekosh,  
Public Interest Law Institute (PILI) (USA, Hungary, Russia)
17. Karina Banfi  
Regional Alliance for the Freedom of Expression and Information (United States, Mexico, Honduras, Dominican Republic, Panama, Nicaragua, Peru, El Salvador, Costa Rica, Chile, Argentina)
18. Tony Bunyan  
Statewatch (London)
19. Robert Hårdh  
Swedish Helsinki Committee for Human Rights (Stockholm)
20. Cecelia Burgman  
The Commonwealth Human Rights Initiative (New Dheli, London)
21. Miklos Marschall  
Transparency International - EU Advocacy Working Group
22. Mark Bench  
World Press Freedom Committee (Washington)
23. Jon Thor Thorhallsson  
Confederation of European Computer User Associations (Rekjavik)
24. Stephanie Hankey  
Tactical Tech (Brighton/Bangalore)

***National/Regional Organizations - Europe***

25. Edik Hovhannisyan  
"Achilles" Center of Protection Drivers' Rights, Armenia
26. Boris Pustyntsev,  
"Citizens' Watch" Human Rights NGO, St. Petersburg, Russia
27. Vaga Amirkhanyan  
"Hakastver" (Against Shadow), Armenia
28. Vasile Spinei  
Acces-info Centre (Moldova)
29. Gergana Jouleva  
Access to Information Programme (Bulgaria)
30. Maria Morozova  
AEGEE-Kyiv, Ukraine
31. Remzi Lani  
Albanian Media Institute
32. Zuzana Wienk  
Aliancia Fair-play / Fair-Play Alliance, Slovakia
33. Mary Alice Baish  
American Association of Law Libraries
34. Diana-Olivia Hateneanu  
APADOR-CH (the Romanian Helsinki Committee)
35. Miguel A. Gallardo  
APEDANICA, Spain
36. Antonio González Quintana  
Archiveros Españoles En La Función Pública (AEFP)
37. Levon Nersisyan  
Center of Human Rights Protection after A.D. Sakharov, Armenia
38. Dr. Jindrich Petrlik  
Arnika, Czech Republic
39. Janos Erdos  
Ars Longa Foundation, Hungary
40. Ana-Maria Mosneagu  
Asociatia Pro Democratia (Pro Democracy Association) Romania
41. Levon Barseghyan  
Asparez Journalism Club, Armenia
42. dr Juhászné Halász Judit  
Association for Ragweed-free Hungary
43. Boris Darmanovic  
Association of Young Journalists ( Montenegro )

44. Nazeli Margaryan	Bagaran, Armenia
45. Aurel Stratan	BasaMediaNet (Moldova)
46. Yaman Akdeniz	BilgiEdinmeHakki.Org (Turkey)
47. Dana Kašparová	Brečtan o. z. (Ivy civic association), Slovakia
48. Krassimir Kanev	Bulgarian Helsinki Committee, Bulgaria
49. Maurice Frankel	Campaign for Freedom of Information, UK
50. Isabel Ávila Fernández-Monge	CEACCU (Spanish Confederacion of Housewives, Consumers and Users) Spain
51. Ioana Avadani	Center for Independent Journalism, Bucharest, Romania
52. Drew Sullivan	Center for Investigative Reporting - Bosnia-Herzegovina
53. Gavin MacFadyen	Centre for Investigative Journalism, UK
54. Georgiana Iorgulescu	Centre for Legal Resources, Romania
55. Linda Austere	Centre for Public Politics PROVIDUS (Latvia)
56. Ilir Aliaj	Center for Democratization and Development of Institutions CDDI – Albania
57. Norbert Brazda	Changenet, Slovakia
58. Peter Wilfling	Citizen and Democracy Association (Slovakia)
59. Yuri Ivanov	Civil Association "Public Barometer" - town of Sliven, Bulgaria
60. Mate Varga	Civil College Foundation, Hungary
61. Artak Kirakosyan	Civil Society Institute, Armenia
62. Srdjan Dvornik	Croatian Helsinki Committee for Human Rights, Croatia
63. Winnie Vitzansky	Danish Library Association
64. Anne Louise Schelin	Danish Union of Journalists
65. Miroslav Patrik	Deti Zeme (Children of the Earth), Czech Republic
66. Dr. Sven Berger	Deutsche Gesellschaft für Informationsfreiheit, Germany
67. T.J. McIntyre	Digital Rights Ireland
68. Pavlina Petrova	Economic Policy Research Institute (Macedonia)
69. M <sup>a</sup> Eugenia Callejón de la Sal	Economistas sin Fronteras, Spain
70. Viktor Tarasenko,	Ekologia I Mir, Crimea, Ukraine
71. Sarka Nekudova	Ekologicky pravni servis (Environmental Law Service), Czech Republic
72. Volodimir Berezin	Environmental & Cultural Center Bakhmat, Ukraine
73. Oleksandr Stepanenko	Environmental Humanitarian Association "Green World", Ukraine
74. László Majtényi	Eötvös Károly Public Policy Institute (Budapest), Hungary
75. Fernando Martínez Randulfe	EsCULCa. Observatório para a Defesa dos Direitos e Liberdades, Galiza, Spain
76. Julia Amirkhanyan	Femida, Armenia
77. Mr. Jan-Ewout van der Putten	FOBID Netherlands Library Forum, Netherlands
78. Marry Alexanyan	Forum of Armenian Youth, Armenia
79. Vladimir Milcin	Foundation Open Society Institute – Macedonia
80. Shushan Doydoyan	Freedom of Information Center of Armenia
81. Miroslav PROKES	Friends of Nature, Czech Republic
82. Phil Michaels	Friends of the Earth England, Wales and Northern Ireland
83. Tony Lowes	Friends of the Irish Environment, Allihies, Co. Cork (Ireland)
84. Jose Raul Vaquero Pulido	Fundación Ciencias de la Documentación, Spain
85. Tamar Gurchani	Georgian Young Lawyers' Association
86. Prof. Dr. Rosemarie Will	German Civil Liberties Union (Humanistische Union)
87. Alexey Simonov	Glasnost Defence Foundation, Russia

88. Panayote Dimitras	Greek Helsinki Monitor
89. Magdalena Klimovicova	Greenpeace, Czech Republic
90. Arthur Sakunts	Helsinki Citizens' Assembly Vanadzor, Armenia
91. Marek Antoni Nowicki	Helsinki Foundation for Human Rights, Poland
92. Várady Tibor	Humanista, Hungary
93. Ilona Vercseg	Hungarian Association for Community Development
94. Adam Földes	Hungarian Civil Liberties Union
95. Veronika Mora	Hungarian Environmental Partnership Foundation
96. Judit Bayer	Hungarian Press Freedom Centre
97. Corina Cepoi	Independent Journalism Center, Moldova
98. Tomáš Gremlica	Institute for Environmental Policy, Czech Republic
99. Arcadie Barbarosie	Institute for Public Policy, Moldova
100. Violeta Alexandru	Institute for Public Policy, Romania
101. Ion Georgescu	IRT – Romanian Training Institute
102. Yevgeniy Zakharov	Kharkiv Human Rights Protection Group, Ukraine
103. Ilze Brands Kehris	Latvian Centre for Human Rights
104. Dejan Milenkovic	Lawyers' Committee for Human Rights YUCOM, Serbia
105. Lidiya Topolevs'ka	Legal and Political Research Center «SIM», Ukraine
106. Claire Tixiere	Ligue des Droits de l'Homme – Belgium
107. Iso Rusi	Macedonian Helsinki Committee
108. Danilo Mandic	Macedonian Young Lawyers Association
109. Natalie Zubar	Maidan Alliance, Ukraine
110. Peter Molnar Center	Media and Communication Studies (CMCS), Central European University, Hungary
111. Ognian Zlatev	Media Development Center, Bulgaria
112. Karen Andreasyan	Media Law Institute, Armenia
113. Taras Shevchenko	Media Law Institute, Ukraine
114. Rashid Hajili	Media Rights Institute, Azerbaijan
115. Katarína Šimončíčová	Mestský výbor Slovenského zväzu ochrancov prírody a krajiny (Slovak Union of the Nature and Landscape Protectors, City Committee), Slovakia
116. Nafsika Papanikolatos	Minority Rights Group-Greece
117. Slobodan Franovic	Montenegrin Helsinki Committee for Human Rights
118. Slobodan Franovic	Montenegrin Helsinki Committee for Human Rights
119. Peter Medved	Nadacia Ekopolis / Environmental Partnership for Sustainable Development Association, Slovakia
120. Janko Nikolovski	National commission for protection of the right to free access to public information of the Republic of Macedonia
121. Séamus Dooley	National Union of Journalists (Ireland)
122. Jeremy Dear	National Union of Journalists, UK
123. Michal Tulek	Natura Rusovce, Slovak Republic
124. Michal Tulek	Natura Rusovce, Slovakia
125. Vanja Calovic	Network for Affirmation of NGO Sector – MANS, Montenegro
126. Dr. Thomas Leif	Netzwerk Recherche e.V., Germany
127. Phil Booth for	NO2ID, UK
128. Norwegian Association of Editors	
129. Norwegian Bar Association (Human Rights Committee)	
130. Norwegian Helsinki Committee	
131. Viktoria Mlynarcikova	Open Society Foundation Slovakia

*Council of Europe Convention Letter – Signatories*

132.	Viktoria Mlynarcikova	Open Society Foundation, Slovakia
133.	Monika Ladmanová	Otevrena spolecnost, o.p.s. Czech Republic
134.	Munir Podumljak	Partnership for Social Development, Croatia
135.	Pen Society Norway	
136.	Sergei Bereznuik	Phoenix Fund, Russia
137.	Jens Sejer Andersen	Play The Game, Denmark
138.	Alexei Marciuc	Informational Policy Institute, Moldova
139.	Eugen Urusciuc	Press Monitoring Agency "Monitor Media", Moldova
140.	Mircea Toma	Press Monitoring Agency, Romania
141.	Klime Babunski	Pro Media, Macedonia
142.	Andrea Pal	Regina Foundation, Hungary
143.	Suzana Dobre	Romanian Academic Society
144.	Henrik Kaufholz	'Scoop' - Support Structure for Investigative Reporting East- and South Eastern Europe
145.	Ing. Lesanka Blažencová	Slatinka Association (Združenie Slatinka), Slovak republic
146.	Gabriel Petrescu	Soros Foundation Romania
147.	Sør-Trøndelag College, Norway	
148.	Stefan Szabó	SOSNA association, Slovak Republic
149.	Carlos Cordero Sanz	Sustentia (Spain)
150.	Prof. Claes Sandgren	Swedish Chapter of Transparency International
151.	Matti Stenrosen	Swedish organisation for investigative journalism, Föreningen Grävande Journalister
152.	Petko Georgiev	The Broadcast Training Center ProMedia Foundation, Bulgaria
153.	Amira Krehic	The Center for Free Access to Information Sarajevo (BiH)
154.	Ondrej Dostál	The Conservative Institute of M. R. Stefanik, Slovakia
155.	Marie Kopecka	The Open Society Fund - Prague
156.	Adriana Krnakova	TI Czech Republic
157.	Jesús Lizcano Alvarez	Transparencia Internacional España (Spain)
158.	Pavel Nechala	Transparency International Slovakia
159.	Amalia Kostanyan	Transparency International Armenia
160.	Zorislav Antun Petrovic	Transparency International Croatia
161.	Prof. Dr. Hansjörg Elshorst	Transparency International Deutschland, Germany
162.	Noemi Alexa	Transparency International Hungary
163.	Maria Teresa Brassiolo	Transparency International Italia
164.	Roberts Putnis	Transparency International Latvia
165.	Jan Borgen	Transparency International Norway
166.	Alicja Szabłowska	Transparency International Poland.
167.	Tamuna Karosanidze	Transparency International Georgia
168.	Victor Alistar	Transparency International-Romania
169.	Vladimir Goati	Transparency-Serbia
170.	Volodymyr Yavorsky	Ukrainian Helsinki Human Rights Union, Ukraine
171.	Nils Mulvad	Updates netværk for aktindsigt, Denmark
172.	Csonka András	Védegylet (english: Protect the Future), Hungary
173.	Margo Smit	Vereniging van Onderzoeksjournalisten VVOJ (Netherlands/Belgium)
174.	Vladymyr Peslyak	WETI, Ukraine
175.	Volker Grassmuck	Wizards of OS (Germany)
176.	Georgi Milkov	Youth Forum 2001 Razgrad
177.		& for NGOs Center Razgrad



*Council of Europe Convention Letter – Signatories*

178. & for Woman Support Center in the Village of Strazhet
179. Sarah Maliqi Youth Initiative for Human Rights (Kosovo)
180. Pavol Siroky Za Matku Zem (For Mother Earth Slovakia), Slovakia
181. Pavel Petráš Združenie ochranárov severovýchodného Slovenska – Pčola, Slovakia
182. Miloslava Stejskalova Zeleny kruh, Czech Republic
183. Biljana Kovacevic Vuco Lawyers' Committee for Human Rights YUCOM, Belgrade, Republic of Serbia
184. Victor Tarasenko Crimean Republican Association EKOLOGIA i MIR, Ukraine
185. Gabriella Nemeskéri Hungarian Association of Women's Advocacy
186. Elshad Eyvazli Impartial Journalist Organization, Azerbaijan
187. Intigam Mamedov Deutschland (enrenamtlicher Mitarbeiter von Pro Asyl im Landkreis vom Verein Niedersächsischer Bildungsinitiativen (VNB) – und Sprecher des Arbeitskreis Kaukasische Flüchtlinge in Niedersachsen)
188. Erkin Gadirli Caucasus Caspian Commission
189. Ferah Aliyeva Impartial Journalists Organization, Azerbaijan
190. Barbro Fischerström The Swedish Newspaper Publishers' Association
191. Gubad Ibadoglu Economic Research Center, Azerbaijan
192. Sabit Bagirov Far Centre, Azerbaijan
193. İlgar İbrahimoglu DEVAMM, Azerbaijan
194. Ilgar Mammadov Baku Political Research and Advocacy Institute
195. Fakhrinur Huseynli Azerbaijan Tafakkur (Thinking) Youth Association
196. Malik Bayramov Azerbaijan, Demokratik Jurnalistler Liqasi, Azerbaijan
197. Khaled Aqaliyev Media Rights Institute, Azerbaijan
198. Mehriban Vezir Political and Culture Center of Azerbaijani Women
199. Osman Gunduz Center Information Systems and Technologies Multimedia, Azerbaijan
200. Emin Huseynov Institute for Reporter Freedom and Safety, Azerbaijan
201. Intigam Aliyev ` Legal Education Society, Azerbaijan
202. Gabriella Nemeskéri Hungarian Association of Women's Advocacy
203. Gábor Halmai The Openness Club
204. György Kalas Reflex Environmentalist Association (Reflex Környezetvédő Egyesület), Hungary
205. Ida Csapó Association of Hungarian Internet-user Women (Magyar Internetező Nők Egyesülete- MINŐk)
206. & Women Companion Foundation (Nőtárs Alapítvány)
207. Miklós Rosta Association of Liberal Young People (Liberális Fiatalok Egyesülete)
208. Péter Molnár Óvás! Association (for the protection of the cultural and architectural heritage of Budapest)
209. József Lajtmann Ecological Studio Foundation (Ökológiai Stúdió Alapítvány), Hungary
210. Árpád Győrffy European Association of Hungarian Journalists and Newspaper Makers
211. Péter Balázs Green Radio Public Benefit Association (Zöld Rádió Közhasznú Egyesület- Zörke)
212. Zoltán Ferenczi Greenpower Association of nature protection (Zölderő Környezetvédő és Szépítő Egyesület)

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|------|---------------------|--------------------------------------------------------------------------------|
| 213. | Petra Bárd          | Hungarian Europe Society                                                       |
| 214. | András Kádár        | Hungarian Helsinki Committee                                                   |
| 215. | Nemeskéry Gabriella | tional Lobby Association of Women (Országos Női Érdekvédelmi Egyesület)        |
| 216. | István Farkas       | National Society of Conservationists (NSC), Hungary                            |
| 217. | Csaba Bálint        | Pannon Alliance of Nature Protection (Pannon Természetvédő Szövetség), Hungary |
| 218. | Pál Eötvös          | The Association of Hungarian Journalists                                       |
| 219. | Asabali Mustafayev  | Democracy and Human Rights Resource Centre Public Union, Azerbaijan            |
| 220. | Tapani Tarvainen    | Electronic Frontier Finland                                                    |
| 221. | Israil Iskenderov   | Umid HSSC, Azerbaijan                                                          |

***National/Regional Organizations – Global***

- |      |                            |                                                                                                     |
|------|----------------------------|-----------------------------------------------------------------------------------------------------|
| 222. | Fernando Rodrigues         | ABRAJI - Brazilian Association of Investigative Journalism                                          |
| 223. | Roberto Saba               | Association for Civil Rights, Argentina                                                             |
| 224. | Devendra Dattatray Inamdar | Aurangabad Journalist Union, India                                                                  |
| 225. | Said Essoulami             | Centre for Media Freedom in MENA, Morocco                                                           |
| 226. | Mukhtar Ahmad Ali          | Centre for Peace and Development Initiaves, CPDI-Pakistan                                           |
| 227. | Kela Leon                  | Consejo de la Prensa Peruana (Peruvian Press Council)                                               |
| 228. | John Richard               | Essential Information, USA                                                                          |
| 229. | Miguel Poulido             | Fundar, Mexico                                                                                      |
| 230. | Mary Brumder               | Government Accountability Project, USA                                                              |
| 231. | Dr. Corinne Packer         | Human Rights Internet (HRI), Ottawa, Canada                                                         |
| 232. | Temitope Johnson           | Independent Advocacy Project, Nigeria                                                               |
| 233. | Temitope Johnson           | Independent Advocacy Project, Nigeria                                                               |
| 234. | Javier Casas               | IPYS (Press and Society Institute), Peru                                                            |
| 235. | Walid Abboud               | Maharat foundation, Lebanon                                                                         |
| 236. | Edetean Ojo                | Media Rights Agenda (Lagos)                                                                         |
| 237. | Roy Peled                  | Movement for Freedom of Information in Israel                                                       |
| 238. | Alison Tilley              | Open Democracy Advice Centre, Cape Town, South Africa                                               |
| 239. | Patrice McDermott          | OpenTheGovernment.org                                                                               |
| 240. | Laura Alonso               | Poder Ciudadano (Argentina)                                                                         |
| 241. | Moises Sanchez             | Pro Acceso (Chile)                                                                                  |
| 242. | Jane Kirtley               | Silha Center for the Study of Media Ethics and Law (Minnesota, USA)                                 |
| 243. | Emmanuel Saffa Abdulai     | Society for Democratic Initiatives, Sierra Leone & Freedom of Information Coalition in Sierra Leone |
| 244. | Jerry Zremski              | The National Press Club (Washington DC, USA)                                                        |
| 245. | Dario Soto                 | Trust for the Americas (Washington)                                                                 |

***Individual signatories - à titre personnel:***

1. Marc-Aurele Racicot, Lawyer and Editor of the Open Government Journal, Canada
2. Walter Keim (Norway, German citizen)
3. Eduardo Bertoni, former Special Rapporteur for Freedom of Expression at the Organization of American States (OAS), Washington D.C.
4. Professsor Maeve McDonagh, Faculty of Law, University College Cork, Ireland
5. Jane E. Kirtley, Silha Professor of Media Ethics and Law, University of Minnesota, USA
6. Ursula Owen, Project Director, Free Word Centre for Literature and Free Expression

7. David Goldberg (Scottish Campaign for Freedom of Information), Scotland, UK
8. Dwight E. Hines, Ph.D, Florida, USA
9. Ardita Metaj, Kosovo
10. Dr Ian Brown, Oxford Internet Institute, University of Oxford
11. Volker Grassmuck, Humboldt University Berlin, Germany
12. Alexander Kashumov, Head of Legal Team, AIP, Sofia, Bulgaria
13. Prof. dr. Dirk Voorhoof, Ghent University and Copenhagen University. Former member of the Federal Commission for Access to Administrative Documents (Belgium)
14. Mark Stephens, Partner, Finers Stephens Innocent, UK
15. Michael Ewing, Senior Researcher, Centre for Sustainability, Institute of Technology, Sligo, Ireland
16. Ylber Mehmedaliu, Film Director, Kosova
17. Rosalinda V. Kabatay, School of Communication, University of Asia & the Pacific, Philippines
18. Lara Etoum, Media Consultant, Al Nasher, Jordan
19. László Majtényi, Chairman, Eötvös Károly Public Policy Institute (Budapest) (former DP&FOI Parliamentary Commissioner of Hungary)
20. Oldřich Kužílek, former Member of Parliament Czech Republic, advisor in openness of public administration
21. Jennifer De Beer, Media Lawyer (Oxford)
22. Constantin Ungureanu, Romania
23. Bryan Charles, Belgium
24. Dragos Necula , Romania
25. David Picón Álvarez, Spain
26. Ulf Öberg, Lawyer, Öberg & Associés AB, Sweden
27. Dr. Richard Barbrook, School of Social Sciences, Humanities and Languages, University of Westminster, London, England.
28. Elvira Souto, Galicia (Spain)
29. Susanne Nielsen, Journalist, Aller Press, Denmark
30. Michael Holm, Journalist, 24timer, Denmark
31. Signe Thomsen, Journalist, 24timer, Denmark
32. Julie Lorenzen, Journalist intern 24timer, Denmark
33. Lars Lindevall Hansen, Journalist 24timer, Denmark
34. Anders Emil Møller, Journalist, 24timer, Denmark
35. Heine Richard Jorgensen, Journalist, 24timer / JP/Politikens Hus, Denmark.
36. Plamen Penev, Bulgaria
37. Briitha Bunk, ErstatningsAdvokaterne, Strøget - Århus & København, Denmark
38. Tommy Kaas, Journalist and partner, Kaas & Mulvad, Copenhagen, Denmark
39. Lone Hougaard, Lawyer, ErstatningsAdvokaterne, Århus, Denmark
40. Anne Louise Schelin, Chief Legal Consultant, Danish Union of Journalists
41. Katrine Birkedal Christensen, Journalist at the Danish Journal of Nursing
42. Susanne Tam, Israel (former CEO TI Israel)
43. Nevena Ruzic, Human Rights Lawyer, Belgrade, Serbia
44. Nils Mulvad, European Journalist of the Year 2006, Co-founder of Farmsubsidy.org, partner in Kaas & Mulvad associate professor of The Danish School of Journalism and former executive director of Dicar – Danish International Center for Analytical Reporting.
45. Marleen Teugels, Journalist, Belgium
46. Simon Kruse Rasmussen, Correspondent, Denmark
47. Martin Franciere, Journalist at the newspaper 24timer, Denmark.
48. Mads Brandstrup, Journalist, Denmark

49. Mogens Møller Olesen, Journalist, The Danish Journalism Development Institute
50. Staffan Dahllöf, Freelance reporter, Copenhagen, Denmark
51. Matti Stenrosen, Journalist, Kristianstadsbladet, Sweden
52. Milverton Wallace, Associate of the CIBER group, United Kingdom
53. Claus Thorhauge, freelance journalist, Denmark
54. John Lykkegaard, journalist, Denmark
55. Niels Bjørn Pedersen, editor, Danish union of journalists
56. Peter Hartung, freelance journalist, Denmark
57. Kirsten Weiss, Freelance journalist, Denmark
58. Morten Terp, Journalist (member of the Danish Union of Journalists)
59. Maj Garde, journalist, freelance, Denmark
60. Susanne Falch, journalist, Denmark
61. Ben Holst, DanWatch, Denmark
62. Alexenia Dimitrova, Investigative reporter, 24 Hours Daily, Bulgaria
63. Babatunde Olugboji, United Kingdom
64. Dav Jacobsen, Fotograf og journalist (DJ), Århus, Denmark
65. Dorthe Kandi, journalist, 24timer
66. Driton Qeriqi, Media Law Adviser, IREX Kosovo Media Assistance Program.
67. Guido Muelenaer, Belgium
68. Henrik Pryser Libell, Journalist trade union NJ, Norway
69. Hernán Bonomo, Program Manager of the Network Debate Program – Open Society Institute
70. Kåre Kildall Rysgaard, journalist, Nyhedsavisen, Denmark
71. Laura Robinson, Journalist, writer and filmmaker, Canada
72. Maj Garde, freelance journalist, Denmark
73. Peter Hartung, freelance journalist
74. John Lykkegaard, journalist, Denmark
75. Kirsten Weiss, Freelance journalist, Denmark
76. Marley Cook, Australia
77. Colleen M. Murphy, Executive Director and General Counsel, Connecticut Freedom of Information Commission, United States
78. Ronald Koven, European Representative, World Press Freedom Committee (Paris)
79. Susanne Falch, journalist, Denmark
80. Stephen K. Doig, Professor of Journalism, Arizona State University; past member of the board of directors of Investigative Reporters & Editors, USA
81. Morten Rødevald, advokat (attorney-at-law), Denmark
82. Morten Terp, Journalist (member of the Danish Union of Journalists), Denmark
83. Marine Hakobyan, FOI Expert, Armenia
84. Rob Dyke, Wirelesslondon (Community Wireless Network Organisation), UK
85. Elvira Souto, Galiza, Spain
86. Anja Dybris, Freelance journalist, Denmark
87. Martin Huckerby, Journalist/Editorial Consultant, UK
88. Professor Peter Krug, Herman G. Kaiser Foundation Chair In International Law  
University of Oklahoma College of Law, USA
89. Nadejda Hriptievschi, Public Defender Office, Chisinau, Moldova
90. Dr. Christoph Bruch, Germany
91. Yasha Lange, Director MediaWork (Netherlands) & former Stability Pact Media Task Force  
Director
92. Yasha Maccanico, Rome Italy.
93. Charles Davies, Professor, School of Journalism, Missouri School of Journalism

94. José Octavio López Presa, former Commissioner of the Federal Institute for Access to Public Information (IFAI), Mexico
95. Emily Martinez, Open Society Institute, Washington, USA
96. Joan Bird, Media Trainer, London, UK
97. Renato Goncalves, Member of CADA - Committee of Access on Administrative Documents, & Author of *Access to Information of Public Entities (Acesso à Informação das Entidades Públicas, 2002)*
98. Heather Brook, journalist and author of "Your Right to Know", London, UK.
99. Agim Neza, Albania
100. John Packer, LL.M, Canada
101. Juan Pablo Olmedo, lawyer/litigator, president and founder of ProAcceso Chile
102. María Gabriela Sánchez, España.
103. María Jaraquemada, Lawyer, Chile.
104. Rodrigo Santisteban Maza, México.
105. Boris Ristovic, former staff member of Media Section of OSCE Mission to Montenegro. Montenegro
106. Henrik Pryser Libell, Journalist trade union NJ, Norway
107. Nils E. Øy, Secretary General Association of Norwegian Editors, Norway
108. Muhammad Rashid Mafzool Zaka, Centre for Peace and Development Initiaves, CPDI-Pakistan
109. Mónica Guia, Lawyer, Portugal
110. Oksana nesterenko, Lawyer, Ukraine
111. Oleh Zadoretsky, Lewis & Clark College, Ukraine
112. Dan J. Bye, librarian, Sheffield Hallam University, UK
113. Hana Dvornik, Croatia
114. Orlin Genchev, Computer Science student, American University, Bulgaria
115. Belén Altuna, University Deputy Librarian, Spain
116. Peter Penchev, Vice President, National Movement "Ekoglasnost", Bulgaria
117. Pankratova Lyudmila, Ukrainian Media Lawyers Association, Ukraine
118. Mate SZABO, Eotvos Karoly Policy Institute, Hungary
119. Lyudmyla Opryshko, Ukrainian media lawyers association, Ukraine
120. Ezra Chiloba Simiyu, CEU Budapest
121. Morten Friis Jørgensen, Leader of the board for Danish Journalist's Union, Copenhagen/Capital Branch, Denmark
122. Johan Lidberg, Lecturer and Chair of Journalism School of Media, Communication and Culture Murdoch University, Australia
123. Sarah Holsen, Research Fellow Department of Political Science/School of Public Policy University College London, UK
124. Ludmila Priehodova, Banska Bystrica, Slovensko
125. Dr. Juraj Mesik, Slovakia
126. Safwan Zabalawi, Australia
127. Anne McNeilly, Ryerson University, Canada
128. Rosemary Righter Associate Editor, The Times, UK
129. Savintseva Marina Transparency International-Russia
130. Ramon Abad Hiraldo, Director. Biblioteca de la Universidad de Zaragoza, Spain
131. Zviad Rukhadze, "Progress" Union; "24 saati" Newspaper, Georgia
132. Maia Toriashvili, "Progress" Newspaper, Georgia
133. Marina Gogoladze, PR Service of Lagodekhi Municipality Council, Georgia
134. Nino Khucishvili, Journalist, Georgia

135. Lali Davitashvili, "Speqtri" Newspaper, Georgia
136. Laura Kharitonashvili, "Vejini" Union, Georgia
137. Tamar Makharashvili, "Imedi" Newspaper, Georgia
138. Tea Alaverdashvili, Georgia
139. Sopho Saralidze, "Lagodekhi" TV, Georgia
140. Inga Shiolashvili, "Shiraqi" Newspaper, Georgia
141. Ina Nacvaladze, Office of Inspector General of the Ministry of the Economic Development of Georgia, Georgia
142. Tamar Kalandia, Office of Inspector General of the Ministry of the Economic Development of Georgia, Georgia
143. Lana Oniani, State Ministry for Reform Coordination, Georgia
144. Ia Biganishvili, United Nations Association Georgia, Georgia
145. Ketij Gujaraidze, "Green Alternative" , Georgia
146. Mari Chokheli, "42<sup>nd</sup> Article of Constitution" , Georgia
147. Guranda Jishkariani, "Woman and the New Century" Association, Georgia
148. Otari Chkheidze, "Water Sport Development" Association, Georgia
149. Yordanka Gancheva, Research Director of Economic Policy Research Institute, Skopje, FYROM and co-founder and board member of Access to Information Programme, Sofia, Bulgaria
150. Celia Serradilla Razola, Spain
151. Vesselina Nikolova , TANGRAM Consulting company Ltd., Bulgaria
152. Peter Kupcik, Slovakia
153. Hristina Bancheva , Coordinator, Association "Bikevolution", Bulgaria
154. Ruslan Topolevs'kyi, Ukraine
155. Paul Stewart, UK
156. Philippe Leruth, Journalist EFJ's vice-president, Membre du comité directeur de l'AJP-AGJPB, Belgium
157. Ermal Nazifi, Attorney at law, International Media Lawyers Association, Albania
158. Sandy Lindsay, Journalist Freelance, Canada
159. Jean-Paul Marthoz, Columnist, Le Soir, Belgium
160. Heike Mayer, Deutschland
161. Gaynor M Darbishire, United Kingdom
162. Joseph Greene, Metadata librarian, Republic of Ireland
163. Volodymyr Khanas, Ukraine
164. Victor Garbar, Ukraine
165. Oleksandr Severyn, Alliance "Maidan" NGO, Ukraine
166. Kostia Chekotun, "Maidan" Alliance, Ukraine
167. Vyacheslav Khavrus, Alliance "Maidan" NGO, Ukraine
168. Pavel Petráš, Slovakia
169. Juanjo Cordero, Economist, Sustentia, Spain
170. Eva Moraga, Lawyer, Access Info, Spain
171. Ludmila Priehodova, Slovak Republic
172. Jacobo Elosúa, Spain
173. Bárbara Tardón, Sustentia, Spain
174. Carolina Conde Gómez, Spain
175. Miguel Ángel Gallardo, Cita, Spain
176. Paloma Recio Meroño, Profesora de literatura, Spain
177. Isabel Aramburu Muñoz, Abogada, Spain

178. Susana García Corral, técnica de proyectos de investigación y gestión social, Grupo 5, Acción y Gestión Social, Spain
179. Regan McCarthy, Ph.D. Former Director of Media Affairs, OSCE Mission to BiH (1998-2002); currently Senior Partner, Songmasters, LLC, US
180. Péter Molnár, Senior Research Fellow, Center for Media and Communication Studies, Central European University, Budapest; former Member of Parliament, Republic of Hungary
181. Alex Grigorescu, PhD, Assistant Professor, Department of Political Science, Loyola University Chicago
182. Kristine Holm, organisasjonssekretær, Norsk Presseforbund, Norway
183. Sally Wambold, USA
184. Srdjan Dvornik, Green Party List, Croatia
185. Serhiy Hirik (Сергій Гірик), journalist, "Shakhtar Kryvbasu", Ukraine
186. Simion Pateev, Journalist, Dnevnik Daily Newspaper, Bulgaria
187. Sarlota Pufflerova, Citizen and Democracy, Civic Association, Slovakia
188. Safwan Zabalawi, Australia
189. Ruslan Topolevs'kyi, Ukraine
190. Hristina Bancheva, Coordinator, Association "Bikevolution"
191. Peter Kupcik, Slovakia
192. Vesselina Nikolova, TANGRAM Consulting company Ltd., Bulgaria
193. Celia Serradilla Razola, journalist, Madrid
194. Halya Coynas, Ukraine
195. Kjell Sevón, Legal adviser on petitions to the Greens/EFA Group in the European Parliament, Belgium
196. Milena Gogic, Office of the Ombudsman, Croatia
197. Konstantin Ivanov, Bulgarian Media Institute
198. Gary Orfield, Professor of Education, Law, Political, Science and Urban Planning & Co-Director, Civil Rights Project/Proyecto Derechos Civiles Univ. of California, Los Angeles
199. Codru Vrabie, NGO representative on the National Integrity Council, Romania
200. Eszter Filippinyi, Open Society Justice Initiative, Hungary
201. Aurel Rusnák, Slovakia
202. Sylvia Ondrisova, Slovakia
203. Albin Keuc, Slovenia
204. Maximillian Rasbold-Gabbard, Department of Public Policy, Central European University / United States of America
205. Francois Santier, France
206. Claudia Padovani, University of Padova, Italy
207. Basak Er, Turkey
208. Anna Marra, former director of TI Italia, Italy
209. Renate Weber       Soros Foundation-Romania
210. Thomas Alling       Journalist, Denmark
211. Giorgi Chkheidze   Georgian Young Lawyers' Association
212. Tamar Chugoshvili   Georgian Young Lawyers' Association
213. Nino Lomjaria       Georgian Young Lawyers' Association
214. Tamar Kordzaia       Georgian Young Lawyers' Association
215. Nino Gobronidze      Georgian Young Lawyers' Association
216. Beka Kokaia         Georgian Young Lawyers' Association
217. Otar Kakhidze       Georgian Young Lawyers' Association
218. Tamar Metreveli      Georgian Young Lawyers' Association
219. Beso Abashidze      Georgian Young Lawyers' Association

220. Robert Maglakelidze Georgian Young Lawyers' Association
221. Tamar Khidasheli Georgian Young Lawyers' Association
222. Ekaterine Popkhadze Georgian Young Lawyers' Association
223. Khatuna Kvirashvili Georgian Young Lawyers' Association
224. Konstantin Stalinski
225. Ninia Kakabadze
226. Emzar Diasamidze "Batumelebi" Newspaper
227. Giorgi Girkelidze "Guria News"
228. Davit Mchedlidze "Internews"
229. Sopho Vardiashvili "Media.ge"
230. Rusudan Loladze CIDA
231. Marika Vardoshvili "Timer" Newspaper
232. Maia Mamulashvili "Kakhetis Khma" Newspaper
233. Giorgi Siradze "Guriis Moambe" Newspaper
234. Nato Gobeladze "P.S." Newspaper (Kutaisi)
235. Sophiko Kanchaveli "Akhali Gazeti" Newspaper
236. Grigol Giorgadze Public Defender's Office of Georgia
237. Nino Dalakishvili "Khalkhis Gazeti"
238. Magda Memanishvili "Monitori" Studio
239. Armine Minasian "ATV-12"
240. Tamar Kaldani "Open Society - Georgia"
241. Khatuna Gogashvili "Hereti" Radio
242. Gela.Mtivilishvili "Imedi" Newspaper (Kakheti)
243. Nana Biganishvili "Monitori" Studio
244. Nino Zuriashvili "Monitori" Studio
245. Lia Kiladze "Alioni" Newspaper (Ozurgeti)
246. Nino Mumladze "The Messenger"
247. Tamuna. Mamukashvili "Pirveli" Agency
248. Michel Crochemore France
249. Marjan Kroflič Psychologist, Slovenia
250. Pierre Boulanger Research and Teaching Fellow, Groupe d'Economie Mondiale at Sciences Po, Paris, France
251. Khaled Aqaliyev Media Rights Institute, Program coordinator, Azerbaijan, Baku
252. Ingrid Verebes Hungary
253. Tamerlan Rajabov Azerbaijan
254. Konul Bilalova
255. Selena Selen Azerbaijan
256. Akshin Beshirli Azerbaijan
257. Elgun Elguntsu Azerbaijan
258. Irada Bagirova Azerbaijan
259. Katalin Szoke, Trust for Civil Society in Central and Eastern Europe, Hungary
260. Khatira Shikhiyeva, City University UK, Alumnus, Azerbaijan
261. Leila Alieva Azerbaijan
262. Mikko Tähkänen Finland
263. Quran Memmedov Azerbaijan
264. Sabir Mammedov Azerbaijan
265. Sabit Bagirov Azerbaijan
266. Selena Selen Azerbaijan
267. Tamerlan Rajabov Azerbaijan



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|------|-----------------|------------|
| 268. | Ingrid Verebes  | Hungary    |
| 269. | Yashar Zeynalov | Azerbaijan |