

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 States¹. 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

¹ 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 Specialists², 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.

² 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, www.article19.org and 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;³
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:

- | | |
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| 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 |

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

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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, "42nd 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 Kviralashvili 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.Mtivlishvili "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 |