

JOURNALISTS' ACCESS TO INFORMATION OF PUBLIC INTEREST

From **letter of the law** to **abuse** by authorities



Introduction

Enforcement of the right of access to information is still a troublesome task for the people who try to obtain data of public interest from authorities. Since in the vast majority of cases the representatives of the journalistic community are the ones who request access to information, they are the group most affected by the faulty practices of some institutions and authorities.

Moldovan journalists complain of limited access to information, reporting evasive, abstract or incomplete answers, as well as thinly veiled refusals that are barely justified by the protection of personal data, tax secrecy, or simply by invoking data confidentiality. In fact, some reporters have already become accustomed to the long times waiting for reaction from information providers, and when they get a delayed response, the information received is no longer of informative value for the public and becomes useless to the journalist documenting current topics.

At a time strongly affected by the pandemic crisis, the media still hope, more than ever, for free access to reliable and verified information. The withdrawal of restrictions valid during the state of emergency, it seems, did not improve the bad experiences of reporters who count on the openness of the authorities.

In the context of the **International Day for Universal Access to Information**, marked annually on September 28, the Independent Journalism Center (IJC) aims to remind of the importance of institutionalizing transparency in relations between citizens and state representatives, underlining the need to ensure free access of the media to information of public interest and to remedy the abusive administrative practices of public authorities and institutions.

This report is the result of a strategic exercise implemented by the IJC with the purpose of analysing the way in which some providers treat requests for information, as well as of revealing cases when the practices of authorities are in line with the law and when they resort to abuse. At the same time, the report contains a summary of data received from providers, which complete the picture of the situation with the right of access to information during the last year.

**ACCESS
TO INFORMATION
OF PUBLIC
INTEREST**

~~FAD OF THE PRESS~~
RIGHT GUARANTEED BY LAW

The way in which a state legislates guarantees of the right of access to information is the litmus paper that reveals the degree of transparency achieved by authorities in the exercise of their duties in the public interest.

Over time, local lawmakers ratified conventions and adopted laws that guarantee all persons the right to request and receive information of public interest from state authorities, thus participating in the decision-making process.

Universal Declaration of Human Rights (UDHR)

Article 19

Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and **to seek, receive** and impart **information** and ideas through any media and regardless of frontiers.

**The Moldavian Soviet Socialist Republic (MSSR) acceded to the Universal Declaration of Human Rights in 1990¹.*

European Convention on Human Rights (ECHR)

Article 10

Everyone has the right to freedom of expression.
This right shall include freedom to hold opinions and to **receive** and impart **information** and ideas without interference by public authority and regardless of frontiers.

**Convention for the Protection of Human Rights and Fundamental Freedoms, also called the European Convention on Human Rights (ECHR), was ratified by the Republic of Moldova in 1997².*

The Constitution of the Republic of Moldova³

¹ Parliament Decision no. HP217/1990 of 28.07.1990 on the accession of the Moldavian Soviet Socialist Republic to the Universal Declaration of Human Rights and ratification of international human rights pacts

² Decision of the Parliament of the Republic of Moldova no. 1298 of 24.07.1997 on ratifying the Convention for the Protection of Human Rights and Fundamental Freedoms (see [here](#))

³ Constitution of the Republic of Moldova no. 1 of 29.07.1994 (see [here](#))

Article 34

The right of the person to have **access to any information** of public interest **cannot** be restricted.

Public authorities, according to their competences, are obliged to ensure the correct information of citizens on public affairs and matters of personal interest.

Aiming to transpose this constitutional provision into special regulatory acts, in 2000, Moldovan lawmakers adopted the **Law on access to information**⁴. The document specifies exactly *when, how, from whom and under what conditions* a journalist can request information.

Another important act for the press is the Council of Europe Convention on Access to Official Documents⁵, which the Republic of Moldova ratified in 2013 and which entered into force only in **December 2020**. It is the first binding international legal instrument that recognizes the general right of access to official documents held by public authorities.

Despite the fact that, over time, several mechanisms have been legislated to improve free access to information, the “barricades” between journalists, on the one hand, and civil servants, on the other, do not seem to have become smaller at all.

Any legislative paper, even the most skilfully elaborated, loses its value if its application in practice leaves much to be desired. Representatives of the journalistic community continue reporting impediments they face when trying to access data of public interest.

That is why the IJC decided to analyse the conduct of some information providers and to assess whether public authorities treat the right of access to information as a legal guarantee or a fad of journalists.

Who were the recipients of our requests?

In order to be able to analyse the administrative practices of information providers, we asked journalists about the authorities they turned to most often

⁴ Law no. 982 of 11.05.2000 on access to information (see [here](#))

⁵ Council of Europe Convention on Access to Official Documents (see [here](#))

during 2020. Also, journalists told us about the long “roads” they travelled when claiming their legitimate right to obtain the necessary data from some providers in order to transmit them, in their turn, to media consumers.

As seen in the reports of journalists, the intensification of fake news in the context of the pandemic crisis forced independent media to seek, as a priority, truthful data from the representatives of executive authorities, especially from the Ministry of Health. Of course, the Parliament, the Presidency, as well as other institutions, such as the Court of Accounts, the National Bank of Moldova, the State Tax Service, and other authorities were among the actors targeted by the media.

In case of events in the field of justice, journalists turned to law enforcement bodies, such as the police or the prosecutor’s office. At the same time, some journalists shared with us the experience of interaction with local public authorities from different regions of the country.

Nine of the 31 requests signed by the IJC went to the ministries that existed at the time when those requests were drawn up.

- ✓ Ministry of Health, Labour and Social Protection
- ✓ Ministry of Foreign Affairs
- ✓ Ministry of Internal Affairs
- ✓ Ministry of Agriculture, Regional Development and Environment
- ✓ Ministry of Defence
- ✓ Ministry of Economy and Infrastructure
- ✓ Ministry of Education, Culture and Research
- ✓ Ministry of Finance
- ✓ Ministry of Justice

- ✓ Parliament
- ✓ Presidency
- ✓ Court of Accounts
- ✓ National Bank of Moldova
- ✓ Public Services Agency
- ✓ State Tax Service
- ✓ Public Property Agency
- ✓ Central Electoral Commission
- ✓ National Office of Social Insurance

Other **nine** requests were directed to the Parliament, Presidency and other authorities vested with the power to serve the public interest.

Six requests were sent to law

- ✓ General Prosecutor’s Office
- ✓ National Anticorruption Center

enforcement bodies that work in the field of justice.

- ✓ National Integrity Authority
- ✓ National Administration of Penitentiaries
- ✓ General Police Inspectorate
- ✓ Chisinau Court, Riscani district office

- ✓ Cimislia District Council
- ✓ Chisinau Mayor's Office
- ✓ Taraclia Mayor's Office
- ✓ Comrat Mayor's Office
- ✓ Balti Mayor's Office
- ✓ Criuleni Mayor's Office
- ✓ Soldanesti Mayor's Office

The remaining requests were sent to **seven** local public authorities suggested by journalists.

What information did we request from authorities?

In order to increase the usefulness of the practical exercise, we formulated a series of questions to help us get a clearer impression of how and how often the authorities receive and solve journalists' requests. So, we asked all 31 providers to answer the following questions:

- How many information requests did they receive in 2020?
- How many of those requests were refused?
- How many of the applicants dissatisfied with the response sued the authority?
- What is the salary of the employees working in the media relations service?

At the same time, depending on the specific activity of each provider, we supplemented the list with additional questions. For example, we asked the Ministry of Foreign Affairs for the number of foreign journalists it accredited, the courts – for the number of lawsuits initiated to defend the right of access to information, and the prosecutor's office and the National Integrity Authority – for the number of situations they took note of after publication of journalistic investigations.

Important! The IJC requested simple information, which could not be classified in any form as personal data, tax secrecy, investigation secrecy or any other category of limited information.

FROM LETTER OF THE LAW TO ARBITRARY CONDUCT



Evasive answers

Many of the authorities we addressed gave us vague or evasive answers when we asked for the exact amount paid monthly as salaries to the employees working in public relations departments.

While the Parliament communicated to us only the minimum and maximum margin of employees' remuneration, the State Tax Service, the Central Electoral Commission, the National Anticorruption Center and the General Police Inspectorate only mentioned the regulatory act based on which the monthly salary is calculated. At the same time, the Chisinau Mayor's Office only told us the cumulative amount paid as salaries to the employees of its public relations department.

Thus, in fact, these authorities did not provide the information we requested or, in other words, they violated our right of access to information.

Excerpt from the reply of the Secretariat of the Parliament of the Republic of Moldova no. 50 of 16 August 2021

In total, the General Directorate of Communication and Public Relations (GDCPR) employs 21 civil servants. The salary of a senior consultant in the GDCPR **varies** between 10,000 MDL and 11,700 MDL, depending on the length of service.

Excerpt from the reply of the Central Electoral Commission no. CEC-8/4605 of 6 August 2021

In the CEC, the duties of the press service and public relations service are carried out by the Communication, Public Relations and Media Department (CPRMD). The manner and conditions of salary payment to officials from the CPRMD **are stipulated by the Law** on the unified salary system for the budget sector.

Excerpt from the reply of the National Anticorruption Center no. 01/5343 of 13 August 2021

Between 2019 and now, the Public Relations Service has been employing two persons: the head of the service and an inspector. Implementing the provisions of the Law on the unified salary system for the budget sector and Government Decision no. 1231 of 12.12.2018 on the implementation of Law no. 270/2018 on the unified salary system for the budget sector, the employees of the NAC's Public Relations Service **have monthly salaries that are set individually**.

Excerpt from the reply of the State Tax Service no. 50 of 16 August 2021

The subdivision responsible for public and media relations employs two persons.

According to Article 39 (2) of the Law on civil service and the status of civil servant, the salaries of civil servants are established under the conditions of this law and of the legislation on the salary system for the budget sector. **The basic monthly salary of a civil servant is set out in Annex no. 3, Table 2 of the Law on the unified salary system for the budget sector.** At the same time, according to Article 3 of the Law on the declaration of personal wealth and interests, tax officials of the State Tax Service are subject to declaration of personal wealth and interests. Respectively, a declaration in this regard is submitted every year within the period provided by law. The declaration is a public document, and it contains, among other things, the income obtained at the place of work and can be seen on the website of the National Integrity Authority.

Excerpt from the reply of the General Police Inspectorate no. 2783 of 18 August 2021

Regarding the monthly salaries of the employees of the Press and Public Relations Service, it is provided that **they are set in accordance with the Law** on the unified salary system for the budget sector, including the basic salary and all bonuses, awards and other salary rights granted in addition to the basic salary corresponding to each category of staff in the budget sector.



Complete answers

One third of the authorities, however, provided us with full information that we requested.

Excerpt from reply of the Presidential Office of the Republic of Moldova no. 2/2-8/1-678 of 25 August 2021

The Media Communication Section was created at the beginning of this year, and it is currently a subdivision of the Communication and Protocol Directorate. The section has four employees: head of section, one consultant, one photographer and one cameraman. The taxable salaries of employees are as follows: head of section – **13,729 MDL**; consultant – **8,285 MDL**; photographer – **11,753 MDL** (for multiple duties); cameraman – 12,446 MDL (for multiple duties).

Excerpt from the reply of the National Integrity Authority no. 09/4644 of 17 August 2021

Regarding the question on the monthly salaries of the Press and Public Relations Service, we shall mention that the salary for the position of head of the service is **15,750 MDL**, and the salary for the main specialist is **10,150 MDL**.

The salaries of employees of the Public Relations Service are set by the Law on the unified salary system, as follows:

- a) Average gross monthly salary of the head of section – **10,268 MDL**;
- b) Average gross monthly salary of the deputy head of section – **9,435 MDL**;
- c) Average gross monthly salary of the senior specialist of section – **6,477 MDL**.

Because of the unattractive social package, there are no people willing to apply to the contests organized to fill the vacant positions in the section.

The most complete answer to the question on the remuneration of employees we received from the Court of Accounts. They communicated the precise number of staff units at the Public Relations Service, the position held by each employee and the amount of the monthly salary, specifying its components.

Excerpt from the reply of the Court of Accounts no. 1/02-593-21 of 11 August 2021

Item no.	Position	Monthly salary amount (in MDL)				Total
		Tariff salary	Degree	Performance boost	Difference according to Article 27 of Law no. 270/2018	
1.	Head of section	11,170	375	1,452	326	13,323
2.	Senior consultant	8,500	275	1,105	232	10,112
3.	Senior consultant	8,330	200	1,166	0	9,696

Another example of **elusive wording** we found in the letter of the General Prosecutor's Office (GPO). Regarding the number of refuses it had given, the authority informed us that it found no case of "**unfounded**" refusal. In other words, the GPO avoided telling us how many times it said "No" to applicants, whether founded or unfounded, in the opinion of the authority.

Excerpt from the reply of the Prosecutor's Office of the Republic of Moldova no. 17-9d/21-5483 of 17 August 2021

Between 01.01.2020 and 01.07.2021, there were no cases of **unfounded** refusal to provide information from the perspective of the Law on access to information.



Some of our requests were submitted at the offices of information providers. Although some envelopes arrived at their destination on 23 July (Friday), the authorities registered them only on Monday, 26 July.

Administrative Code

Article 73

A public authority must receive and register **immediately** any petition or other documents submitted under administrative procedure.

If petitions or other documents are submitted at the office of a public authority, the subdivision responsible for public relations shall issue proof of their registration.

In fact, according to the law, the date of registration must coincide with the day when the journalist submitted the application at the office of the authority, and it shall be the starting point for calculating 15 days of waiting.



Language in which the answer is formulated

Two of the replies received by the IJC were formulated in Russian. They were from Taraclia Mayor's Office and Comrat Mayor's Office.

Law on access to information

Article 14

Information, documents requested in accordance with this law shall be made available to applicants **in the state language** or in the language in which they were drafted.

If information, documents have been drawn up in a language other than the state language, the information provider must submit, at the request of the applicant, a copy of the authentic translation of the information, document into the state language.

The current legislation obliges providers to give applicants the required information in the state language, the only exception being the case when the documents were originally written in another language. In our case, the

authorities' reply involved only the communication of some numerical data and had to be drawn up in Romanian.



References to links

Among the standard questions inserted in the requests for access to information we intentionally slipped some requests for documents that are published on the web pages of authorities.

Explanatory decision of the plenum of the Supreme Court of Justice

no. 1 of 02.04.2007

Paragraph 22

It shall be considered **illegal** to refuse providing information on the grounds that it is publicly available, that is, if the information has already been published.

According to the law, providers must provide the requested information regardless of whether it can be found on the Internet or is displayed at the institution's headquarters.

However, the authorities where we requested copies of reports or decisions already published referred to the source by inserting links. This practice contradicts the legal provisions and takes on an absurd nature, especially when answers are provided on paper and the links cannot be accessed.

Excerpt from the reply of the Public Property Agency no. 05-05-5261 of 17 August 2021

The report on the administration and denationalization of state public property in 2020 can be accessed on the web page of the Public Property Agency: *Decision-making transparency/Annual reports*.

Excerpt from the reply of the Public Services Agency no. 01/6854 of 24 August 2021

The list of beneficiaries of the percentage designation (Law on 2%) for 2021 can be seen on the official website of ASP, www.asp.gov.md, at <http://www.asp.gov.md/ro/node/3963> or in the section of Useful Information.



Which provider is the most responsive?

Delay in the process of providing information is one of the problems that reporters complain about most often. Given that journalistic work involves a feverish regime for documenting articles and informing the public, the response speed of authorities is extremely important for the media.

An information seeker cannot be let to wait for information more than **15 working days**. This period can be extended by another 5 days only if a very large volume of data has been requested or if further consultation is needed to meet the request. In this regard, the law obliges the authority to inform the journalist about delay on the 10th day of waiting.

Law on access to information

Article 16

The requested information or documents shall be made available to the applicant from the moment they are available to be provided, but **not later than 15 working days** from the date of registration of the request for access to information.

The head of the public institution can extend the period of providing information or documents by **5 working days** if:

- a) the application refers to a very large amount of information that needs to be selected;
- b) additional consultation is needed to meet the request.

The author of the request shall be informed about any extension of the information provision period and its reasons **5 days before the expiry of the initial term**.

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Two extremes, both from the Government

The period of waiting for a reaction from the Ministry of Internal Affairs was the shortest – **3 working days**, and the slowest of the providers was the Ministry of Education, Culture and Research⁶ (MECR), which came up with a reply in **36 working days**, i.e. 54 calendar days.

The MECR noted in its reply that the IJC’s request involved the verification of a large volume of information and that officials needed quite a lot of time. “Please note the lack of intention to delay the provision of the requested data and our readiness for future collaboration,” the ministry representatives said. Whether with a good or ill will, a 15-day delay in the provision of information is still a violation of legal provisions. At the same time, we shall note that the provider did not comply with the obligation to inform the author of the request about the extension of the term.

Law on access to information

Article 11

An information provider, in accordance with their powers, has the obligation (...) to comply with the information provision terms provided by law.

Out of all providers, only the Presidency and the MECR exceeded the maximum information provision term, the former by 2 working days, and the latter by 21 days.

The period of waiting for replies from information providers

No.	Information provider	No. working days
1.	Ministry of Internal Affairs	3
2.	Ministry of Foreign Affairs	5
3.	Ministry of Justice	7
4.	Ministry of Defence	9
5.	Ministry of Agriculture	14
6.	Ministry of Economy	14
7.	Ministry of Finance	14
8.	Ministry of Health	15
9.	Minister of Education	36

No.	Information provider	No. working days
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⁶ The IJC sent requests in July and August, before the separation of the Ministry of Education, Culture and Research into two entities.

1.	Central Electoral Commission	3
2.	Court of Accounts	5
3.	Parliament	7
4.	National Office of Social Insurance	7
5.	Public Property Agency	9
6.	State Tax Service	10
7.	National Bank of Moldova	12
8.	Public Services Agency	15
9.	Presidency	18

No.	Information provider	No. working days
1.	National Anticorruption Center	9
2.	National Integrity Authority	9
3.	National Administration of Penitentiaries	9
4.	Chisinau Court, Riscani district office	9
5.	General Prosecutor's Office	12
6.	General Police Inspectorate	12

No.	Information provider	No. working days
1.	Cimislia District Council	4
2.	Criuleni Mayor's Office	4
3.	Taraclia Mayor's Office	5
4.	Chisinau Mayor's Office	10
5.	Balti Mayor's Office	11
6.	Soldanesti Mayor's Office	12
	Comrat Mayor's Office	15

Which provider has received the most requests for access to information?

No.	Information provider	No. of requests (01.01.2020-01.01.2021)
1.	Ministry of Education and Research	454
2.	Ministry of Economy and Infrastructure	158
3.	Ministry of Internal Affairs	79
4.	Ministry of Defence	51
5.	Ministry of Finance	49
6.	Ministry of Foreign Affairs	41
7.	Ministry of Justice	32
8.	Ministry of Agriculture	10
9.	Ministry of Health	?

Note: The Ministry of Health, Labour and Social Protection informed us that it has two information systems that accounted for a total number of 19,568 petitions of different types in 2020, but the ministry does not know how many of these are requests for access to information.

No.	Information provider	No. of requests (01.01.2020-01.07.2021)
1.	Public Services Agency	208,402
2.	National Bank of Moldova	676
3.	Central Electoral Commission	178
4.	Parliament	146
5.	National Office of Social Insurance	104
6.	Presidency	87
7.	Court of Accounts	7
8.	Public Property Agency	6
9.	State Tax Service	?

Note: In its reply, the State Tax Service informed us that “the information system used by the institution for registration of entering documents does not allow separate selection of the requested information.”

No.	Information provider	No. of requests (01.01.2020-01.07.2021)
1.	National Anticorruption Center	1,050
2.	General Prosecutor’s Office	657
3.	General Police Inspectorate	579
4.	National Administration of Penitentiaries	454
5.	National Integrity Authority	350

No.	Information provider	No. of requests (01.01.2020-01.07.2021)
1	Criuleni Mayor’s Office	521
2	Balti Mayor’s Office	277
3	Comrat Mayor’s Office	351
4	Chisinau Mayor’s Office	43
5	Taraclia Mayor’s Office	25
6	Soldanesti Mayor’s Office	12
7	Cimislia District Council	16

Who issued the most refusals to provide information?

No.	Provider	No. of refusals issued (2020-2021)
1.	Public Services Agency	159
2.	National Administration of Penitentiaries	91
3.	National Bank of Moldova	3
4.	Ministry of Agriculture	2
5.	Ministry of Internal Affairs	2
6.	Ministry of Defence	1
7.	Court of Accounts	1
8.	National Integrity Authority	1
9.	Ministry of Foreign Affairs	1

Providers that issued no refusal in 2020-2021

No.	Provider	No. of refusals issued (2020-2021)
1.	Ministry of Finance	0
2.	Ministry of Justice	0
3.	Ministry of Health, Labour and Social Protection	0
4.	Ministry of Economy and Infrastructure	0
5.	The Parliament of the Republic of Moldova	0
6.	Central Electoral Commission	0
7.	National Office of Social Insurance	0
8.	Cimislia District Council	0
9.	Chisinau Mayor's Office	0
10.	Comrat Mayor's Office	0
11.	Balti Mayor's Office	0
12.	Soldanesti Mayor's Office	0
13.	Public Property Agency	0

Providers we failed to get a reply from

No.	Provider	Reason
1.	Ministry of Education and Research	The correspondence registration system of this ministry does not allow identifying the total number of requests, the examination of which led to refusal in the provision of information.
2.	Office of the President	The Presidency's register of electronic records of documents <i>e-cancelarie</i> does not contain generalized information on refusals in the provision of information.
3.	State Tax Service	The information system used does not allow separate selection of the requested information.
4.	General Prosecutor's Office	During the reporting period, there were no cases of "unfounded" refusal to provide information.

5.	National Anticorruption Center	The Center does not keep separate records on executed materials.
6.	General Police Inspectorate	The provider avoided telling the number of refusals given.
7.	Taraclia Mayor's Office	The provider avoided telling the exact number of refusals given.
8.	Criuleni Mayor's Office	The provider avoided telling the number of refusals given.

Providers with the most cases in court (2020-2021)

No.	Provider	No. cases concerning the defence of the right of access to information
1.	Ministry of Justice	62
2.	Public Services Agency	10
3.	General Prosecutor's Office	10
4.	Ministry of Internal Affairs	7
5.	State Tax Service	5
6.	General Police Inspectorate	4
7.	Ministry of Agriculture	2
8.	National Anticorruption Center	2
9.	Comrat Mayor's Office	2
10.	Ministry of Education and Research	1
11.	National Bank of Moldova	1
12.	Parliament	1
13.	Central Electoral Commission	1

Note: The court that judges all disputes against the authorities of Chisinau municipality (Chisinau Court, Riscani district office) informed us that, between 1 January 2020 and 7 July 2021, it received 288 applications for summons from information seekers who challenged the refusals of public authorities.

Contribution of journalists to initiating procedures for investigation of illegalities

From the reply received from the National Anticorruption Center (NAC) we learned that, between 1 January 2020 and 1 July 2021, it examined **13 cases** of corruption after journalists published investigations and articles revealing illegalities. The General Prosecutor's Office told us that "**as a rule**, prosecutors react to journalistic investigation materials that appear in the public space if they give rise to reasonable suspicion of crimes being committed." However, "in the absence of a clear proof of this", the GPO could not provide us with exact figures.

Foreign journalists accredited by the MFAEI (01.01.2020 – 01.07.2021)

From the reply received from Ministry of Foreign Affairs and European Integration (MFAEI) we learned that during 2020, 41 accreditation requests were received from 29 media organizations from foreign countries (Romania, Ukraine, Belarus, Russia, France, Spain, The Netherlands, Great Britain, Latvia, Estonia, Finland, Georgia, Turkey, etc.). Media organizations applied for accreditation of 95 foreign journalists, but the MFAEI issued only 92 accreditation cards, as 3 applications were rejected. “The vast majority of accreditation requests were made in connection with the conduct of presidential elections in November 2020,” the provider said.

At the same time, since the beginning of 2021, the MFAEI received 28 applications from 23 media organizations that requested the accreditation of 79 foreign journalists. The ministry issued 66 cards, and 4 were rejected. Like in 2020, most of the accreditation requests were submitted in the context of the early parliamentary elections of 11 July 2021.

CONCLUSIONS

The results of the experiment conducted by the IJC reconfirmed the existence of problems constantly reported by journalists who try to exercise their right of access to information.

The simplicity of the data we asked for, apparently, did not reduce the length of the information delivery time. While waiting for replies from ministries took an average of 13 working days, other categories of providers delivered replies on average within 10 working days.

Even if the requests sent to authorities concerned information of low complexity, which could not be classified as limited data, the way in which some providers handled the requests revealed practices that were contrary to the law.

The incomplete, elusive and abstract answers of some authorities to the question regarding the exact salaries of some employees prove that this approach of providers occurs especially when it comes to transparency in the administration of public money. References to web pages where the requested documents are found was another misconduct we found.

According to summarized data, a ministry solves annually an average of 109 requests for access to information, and a public authority in the field of justice receives an average of 617 requests. At the same time, according to the received data, local public authorities solve 177 requests for access to information per year.

Although only nine of all providers have communicated about the existence of at least one case when they issued a refusal to provide information, the number of lawsuits filed against the others indicates either that some authorities misinterpret the legal concept of “refusal to provide information”, or that the data presented by the recipients of requests contain erroneous data.

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