

Access Info

Annual Report 2022

1. EU Transparency: Stronger rules, better practice

Objectives:

- » Higher profile debate on future revision of the EU access to documents rules, leading to eventual reform of the rules, including strengthened mechanisms, good balance with personal data protection, strong proactive publication requirements, and strengthened/clarified record keeping requirements;
- » Existing rules are better applied in practice, particularly for investigative journalists and civil society organisations, resulting in a positive impact on levels of transparency which are currently a challenge such as Trilogues, Council Working Parties, text messages, and infringement proceedings;
- » Better data collected and published about the processing of requests by EU bodies, including transparency about the funds dedicated to improving EU transparency, leading to an eventual increase in those funds.

In 2022 Access Info continued to focus on the European Union transparency rules and levels of openness in practice, as these set standards not just for European countries at the national level, but also, through the so-called Brussels effect, for the entire world.

The main monitoring tool which Access Info has is the AsktheEU.org platform, which generates overall data, which is complemented by data that we receive via enquiries from users to whom we provided support on specific cases. During 2022 our priority was giving assistance to human rights and environmental organisations, anti-corruption groups, and investigative journalists.

In 2022 Access Info helped various users of AsktheEU.org prepare cases to go to the European Ombudsman or even to consider court cases. The issues in 2022 included Trilogue transparency, expenses transparency from various agencies, and decision making by the Commission.

We participated in a debate with the European Ombudsman's office and in webinars with Vice President Vera Jourova's office on possible future revision of the EU access to documents rules. The European Commission is said to be preparing a proposal, although at year's end this had not yet been published.

A concern about Regulation 1049/2001 on access to documents – something which has an impact on users in practice – is that it predates the revision of the EU treaties (2009), and so does not reflect a full right of access to documents. The consequences, and hence much of the focus of our support to requesters, is that privacy and personal data protection override access to documents. Examples in practice in 2022 have included requests for expenses by public officials and for the names of participants in decision-making processes, cases which were still ongoing at year end.

Access Info is also advocating for a stronger oversight mechanism, with the European Ombudsman able to make binding decisions, along with stronger proactive publication requirements, along with strengthened and/or clarified record keeping requirements.

An example of a specific concern which Access Info has raised with EU officials and will be campaigning on in 2023 is that the reports published by EU bodies, particularly by the Commission, do not provide data on

the time they have taken to answer requests, even though the EU surely has this data. Access Info is collecting data on timeframes and related issues from AsktheEU.org and will use it in campaigning in 2023.

Another concern, raised in complaints we helped an investigative journalist submit to the European Medicines Agency (EMA), is that the EMA limits each request to two documents only and limits five requests at any one time, severely preventing journalists ask for and obtain sufficient data to get a comprehensive picture of any EMA activity.

An EU file, which Access Info tracked in 2022 because of its link with transparency issues, is the proposed European Media Freedom Act (EMFA), also coming out of Commissioner Vera Jourova's office. The EMFA is likely to include proposals on transparency-related topics such as transparency of media ownership, something Access Info has previously conducted research on, with our recommendations having been taken up by the Parliamentary Assembly of the Council of Europe. In 2022 Access Info also liaised with media freedom groups about using the right of access to information to track the legislative process on the EMFA.

1.1 AsktheEU.org Request Platform Support to Users

Access Info has run the AsktheEU.org request platform since 2011, in collaboration with mySociety which provides all the technical infrastructure and upgrades, while Access Info offers ongoing support to users and responds to queries from EU bodies.

In 2022 the most common issues for requesters were the ways in which some EU bodies handle requests, such as the Commission requiring postal addresses (about which many requesters turn to us before providing it) or Frontex insisting on the ID of the requester. Once such data has been provided, we have to ensure that it has been redacted from public access in AsktheEU.org.

Another issue is that of obtaining responses from Frontex where a special token and email address are needed to download the information, so our support to requesters is needed for each and every response from Frontex.

Most of the assistance provided to EU access to documents requesters has been those making requests via the AsktheEU.org platform, although many of these are AsktheEU.org PRO users and so are not publishing the data online until the requests have been received answers and relevant articles published. This approach encourages professional users to share more information with Access Info and to ask us for more in-depth help.

From the side of EU bodies, the most common support issues in 2022 related to accidental release of data (either personal data, unredacted data, or documents accidentally included in an answer). The personal data releases cause EU officials most stress when they spot them, although they sometimes take months to realise. There are also cases of an EU body sending responses to the wrong request from the same requester or, more rarely, to a different requester, or simply to another, wrong, email address. Access Info is able to sort out these issues following liaison with the relevant EU body, something which was common in 2022, occurring up to several times per month.

Meanwhile, in 2022, we continued our particular focus on providing support to journalists who use the site and, more broadly, to all users who have difficulties with specific bodies. We are noticing an increase in the need for guidance on internal appeals as well as advice on taking complaints to the European Ombudsman.

1.2 Investigations carried out using AsktheEU.org

Important stories have been written using documents received via the AsktheEU.org platform. Here are some examples:

- » The Brussels-based NGO **Corporate Europe Observatory** filed requests aiming to increase [transparency of Covid-19 vaccine contracts](#) and negotiations between the EU and pharmaceutical companies. After appealing to the EU Ombudsman, the European Commission published a batch of 275 documents. The European Ombudsman was highly critical of the serious delays in providing this information, which stymied public debate in the meantime.
- » **Alexander Fanta**, a journalist from [netzpolitik.org](#) and one of the top users on AsktheEU.org, wrote an article about an [EU proposal on easy reparability](#) of smartphones and tablets. He also published a story on **EUobserver** about the controversial funding from the EU to some [media outlets in the Western Balkans](#) considered by many as not independent and "mouthpieces of governments" using data obtained in access to documents requests; the article also quotes Access Info Vice President Christian Mihr, in his role as Director of RSF Germany.
- » **Sergio Sangiao**, from Spanish fact-checking website [Maldita.es](#) is another regular user. One story he wrote using documents obtained is about the millions of euros spent on over a quarter of a million [COVID-19 tests carried out at the Spanish airports](#) on incoming passengers with only 0,32% testing positive. This issue has been a politicised scandal in Spain where some regional governments tried to blame external visitors for the spread of Covid as a way to reduce internal restrictions and to question the policies of the national government. Hence having accurate data on this is important to inform the debate.

1.3 Legal Advice for EU-level Appeals

In 2022, Access Info provided guidance and legal advice, including on first level appeals ("confirmatory applications") to multiple AsktheEU.org users and other requesters. For some of these, where we can identify a strategic importance because of the legal questions at issue or the poor implementation of the EU's access to documents rules, we provide additional help such as on drafting appeals to the European Ombudsman and/or giving advice on litigation. Examples of some 2022 cases are:

- » **Travel Expenses Transparency & Protection of Privacy:** Access Info provided hands-on legal assistance to a national journalist to challenge the decision of the Committee of the Regions (CoR) to withhold expenses claims of a national former CoR member who was suspected of double claiming travel costs in his country (Ireland) and from the EU. The legal grounds for this were protection of privacy and personal data (under the EU's version of the General Data Protection Regulation, Regulation 2018/1725, and in line with jurisprudence of the Court of Justice of the European Union). This was in spite of the evidence suggesting fraud, which we argue makes the case distinct from the Luxembourg Court's jurisprudence. The complaint has been submitted to the European Ombudsman who, in initial correspondence with the CoR, has taken a pro-transparency stance. The detailed arguments are still being exchanged at time of writing, and a decision is expected in early 2023.
- » **Vaccine Contract Negotiations:** Access Info has been closely involved in discussions about litigation strategies related to the refusal by the European Commission to provide journalist (and Access Info IAB member) Alexander Fanta with copies of the text messages exchanged between

Commission president Ursula von der Leyen and Pfizer CEO Albert Bourla on the Covid-19 vaccines contracts, as explained in this Politico article. This big story has triggered a debate on what is a document and on the EU's record keeping requirements, with the decision of the EU Ombudsman that text messages are indeed subject to EU transparency rules. The Commission is resisting this definition. In the meantime, we have held discussions with the New York Times legal team and with European pro bono lawyers about a possible court case.

- » **European Medicines Agency Correspondence with Member States re Vaccines:** Access Info provided support to journalist Sergio Sangiao for his appeal to the European Ombudsman after the European Medicines Agency was obstructive in registering his request, and also violated his right to request in a language other than English. There has been an initial, disappointing, opinion from the Ombudsman, whose office has been sympathetic to the EMA during the Covid crisis and has accepted the limitation of two documents per request, even though there is no legal basis for this. Access Info is now discussing strategies with the journalist and with NGOs working in the health sector. There is a serious concern about the EMA's policy of limiting access to information precisely at the time when transparency around medicines and health is so incredibly important. These discussions and the European Ombudsman appeal were still ongoing at time of writing.

2. Defending & Promoting the Right of Access to Information in Europe

Objectives:

- » To address the significant discrepancies between the quality – in law and practice – of access to information laws across the wider European region based on priorities agreed with partners as part of the ATI Project;
- » To use appeals to information commissioners and to national courts and the European Court of Human Rights to secure better judicial protection for the right of access to information;
- » To monitor and promote discussion of a possible, eventual, EU Directive on Access to Information to complement the Open Data Directive. In parallel to promote ratification of and harmonisation with the Tromsø Convention by a larger number of countries.

2.1 Poland: Amicus Curiae Brief to European Court of Human Rights

In 2022, Access Info supported an important case before the European Court of Human Rights by gathering comparative evidence from across Europe that national access to information laws apply to the meetings calendars of senior public officials. Access Info then used this evidence to write an [Amicus Curiae Brief](#), submitted in February 2022, in relation to the case of *Citizens Network Watchdog Poland vs. Poland*.

This case arose when the organisation Watchdog Poland requested the calendars of the Polish Constitutional Tribunal presidents for the period January to July 2017, after media reports that the judges had met a politician in charge of the special services, resulting in changes to the way in which the judges try surveillance and terrorism-prevention cases.

In spite of the broad definition of “information” in Article 1 of Poland's 2001 Access to Public Information Act as “any information about public matters”, the request was rejected on the grounds that it was for an

“internal office document” and therefore the access to information law did not apply. After failing to prevail in the Polish courts, Watchdog Poland lodged the case with the European Court of Human Rights.

Access Info is currently awaiting the decision of the Court.

2.2 Regards Citoyens vs. France - Amicus Curiae to European Court of Human Rights

Another amicus brief to the European Court of Human Rights was prepared by Access Info and ARTICLE 19 in November 2022 with support from FOI Austria, Access to Information Programme Bulgaria, Gong (Croatia), Vouliwatch (Greece), K-Monitor (Hungary), Daphne Caruana Galizia Foundation (Malta), Watchdog Poland, Funky Citizens (Romania), Campaign FOI Scotland, and Oštro (Slovenia), showing how the European access to information community is increasingly coordinating in actions to defend this right.

The case involves a request made by the French organisation Regards Citoyens about MPs expenses. The case was still pending at the end of 2022.

2.3 Malta: Court win in favour of right of all to make requests

On 24 March 2022, Malta’s Information and Data Protection Appeals Tribunal decided in favour of a case brought by Access Info which asserted that everyone should have the right to submit an information request. The Tribunal found that while the wording of the legislation leaves scope for interpretation, “the intention of the legislator was never to withhold such information from the EU citizens.”

The case arose from an August 2019 request for data on migration to Malta submitted by an Italian citizen working at Access Info’s Madrid office. The request was refused by Malta’s Ministry of Home Affairs and National Security on the grounds that she was not a Maltese resident. We then appealed the Information and Data Protection Commissioner, but in October 2019 lost that appeal.

With pro bono legal support from Maltese firm Fenech Farrugia Fiott Legal, we turned to the Tribunal. This March 2022 win is not the end of the story, as the Maltese government is appealing, and the case was still pending at the end of 2022.

This case is part of a pattern in Malta. For instance, Maltese media outlet *The Shift* has around 40 ongoing access to information cases pending, all of which they have won at first instance but are being challenged in court by the government, something which can be seen as “lawfare” and an attempt to curb freedom of expression. Access Info will continue our case in 2023, taking it, if needs be to the European Court of Human Rights or asking the Maltese court to refer it to the Court of Justice of the European Union on the grounds of discrimination against EU citizens.

2.4 Tromsø Convention & ATI Law Reform: Ukraine, Moldova, Georgia

During 2022, Access Info engaged with the Council of Europe and European Union regional offices in various countries to promote the standards of the Tromsø Convention and to strengthen the national access to information laws, including by setting up independent oversight bodies such as information commissioners.

This work included making a series of recommendations to government and civil society in Ukraine, but as the key meeting was held on 23 February 2022, this has not been followed up on. (We are in touch with many of the partners in Ukraine, some of whom left the country, others who are still engaged there, both in civil society work monitoring transparency and combatting corruption, and in defending their country).

Access Info participated in an in-person mission to Moldova in early June 2022, to make recommendations to the government there which is interested in making significant reforms to the 20-year-old access to information law. This included presenting a set of 30 recommendations on the key features that an independent oversight body should have. These were supported by various information commissioner representatives present at the meeting, including from Ireland, Albania, and Slovenia, as well as an expert from Serbia.

Access Info has been, since July 2022 through to late 2022, working on a series of recommendations for the Georgian government, in liaison with the Council of Europe office in Georgia. These include providing comparative information on time limits for access to information, limitations and the public interest test, standards for information commissioners, and practical issues such as the formats of access to documents.

2.5 The Council of Europe Tromsø Convention Access to Information Group

The Council of Europe has now created a group of experts to oversee the Council of Europe's Convention on Access to Official Documents, the Tromsø Convention, which Access Info participated in drafting. The Convention came into force in on 1 December 2020 after 10 ratifications and has now been ratified by 14 countries, with Spain on the point of ratification.

A group of ten independent experts nominated by their countries, known in short as the Council of Europe Access Info Group (rather nicely copying our name in English, although in French it's the *Groupe Accès à l'information*), is now up and running. Access Info is in touch with the coordinators of this group and will be providing input to their country analyses in 2023.

It is likely that between the Tromsø Convention oversight group and a specific Open Government Partnership focus on the European region – something Access Info has been closely involved in during 2022 – there will be more focus on the right of access to information in the wider European region in 2023 and beyond. This could contribute to more support for ratification of the Tromsø Convention, which will also be a focus of our ATI Europe project run with mySociety and Open Knowledge Germany.

2.6 RTI Rating Upgrade

In the second half of 2022, Access Info started revising our evaluation of the RTI laws of all 46 countries in the Council of Europe using the RTI Rating. This is necessitated, in part, because many countries have made amendments to such laws over the past three years, and we will use the analysis to prioritise campaign messages for activities with partners in 2023.

In parallel, Access Info has, in late 2022, been working on a revision to the RTI rating indicators, so as to provide us with a more detailed, nuanced, and fairer set of country evaluations. This does not substitute, of course, for also capturing data on implementation in practice, but will provide a better set of base-line indicators and help guide our support for national advocacy work, particularly given that many national access to information groups make use of comparative data from the RTI Rating in their campaigns.

2.7 Special Focus on Spain: Strengthened transparency in law and practice

Access Info in 2022 continued to work to strengthen the right of access to information in Spain, where the relatively young (2013) access to information law does not yet apply to all branches of power nor all information, with the judicial and legislative branch and archival and environmental information still excluded.

The Spanish context is complicated by 17 regional laws, various municipal rules, and multiple oversight bodies. The national Transparency Council is not fully independent and lacks enforcement powers. Requesting is complex and answers are slow to come, with the result that law is underused in practice, with only around 5,000 requests per year to central government.

On the positive side, there has been a huge cultural shift to which Access Info has contributed: Spain is a committed member of the Open Government Partnership and is one of the few countries in the world with six sub-national OGP members. Furthermore, Spain has an increasingly strong ecosystem of public officials, academics, and the CSOs working on transparency. The Coalición Pro Acceso platform launched by Access Info in 2006 is supported by over 100 CSOs from a range of sectors.

The current four-year OGP Action Plan, co-created with civil society with Access Info having led the process, includes as key commitments reform of the Transparency Law, strengthening proactive publication, opening the company register, adopting lobby regulation, strengthening participation mechanisms, making executive decisions and the preparation of legislation easier to follow, and ratifying the Council of Europe Convention on Access to Official Documents.

In 2022, Access Info's main activities were participation in a specially-convened working group comprising experts from government and civil society which, over the course of the year, defined how to improve the existing access to information law so as to bring it more in line with international standards. The recommendations developed by this group include strengthening the Transparency Council so that it has binding powers. In 2023 the government will produce a draft law reform based on the output of this group.

Access Info also advanced in discussions with the government about making requesting more flexible so that Access Info can re-open the Alaveteli platform, which had to be shut in 2015 as the identification criteria made it impossible to submit requests except by the government portal or in person. It is likely that this flexibility will be introduced in 2023.

Meanwhile, during 2022, Access Info has continued to engage in various trainings, both Masters' classes and specific professional trainings for journalists. The Access Info team also provided guidance and support to numerous requesters, particularly journalists and civil society organisations, taking appeals to the Transparency Council.

3. Strengthening the European ATI Community

Objectives

- » To strengthen coordination between European ATI groups and to mobilise pan-European actions to support national campaigns, for improved law and practice, and for ratification/implementation of the Tromsø Convention.
- » To deliver regular sharing of comparative data on law and practice, translation of key cases, and mutual support for research and litigation, including for cases to the European Court of Human Rights. The goal will be sharing of information beyond the members of the ATI Community.
- » To mobilise support of national ATI groups and other civil society organisations in the campaign for strengthened EU transparency rules and for a possible, eventual, EU Directive on Access to Information for Member States;
- » To increase participation of European ATI groups in processes such as the Open Government Partnership and the UNCAC Coalition, as well as OECD, UNESCO and other fora, at the national, European regional and global level.

In 2022, Access Info worked to consolidate the growing civil society network working on the right of access to information (ATI) across Europe.

There are various dimensions to this growing community – ATI groups, request platforms, investigative journalists, OGP-engaged groups – which have been rather disjointed, with the sharing of knowledge further impeded by language barriers.

Access Info in 2022 established two mailing lists, the first is the **RTI Europe** network for civil society organisations and the second is the **FOI Journalists** network for European investigative journalists. Our goal with a new, three-year, ATI Europe project is to increase membership of and activity on these lists. Access Info will be stimulating debate by sharing relevant stories and news items.

In 2023 we will undertake activities to improve the exchange of news, case studies, challenges and success stories among this community. We also aim to increase mutual support on national campaigns as well as joint participation in regional campaigns, such as at the EU level or for ratification of and compliance with the Tromsø Convention.

To accompany the FOI Journalists group, there is also a Twitter Community, which has an EU focus but also more broadly. The group was set up by Access Info International Advisory Board member Alex Fanta in coordination with the Access Info team.

The coordination of various groups participating in amicus curiae briefs to the European Court of Human Rights and the response to Court of Justice of the European Union cases also helps to bring this community together, and so to have more impact with campaign messages, both at the national level targeting national and local governments, and from the national level to the European Union and Council of Europe levels.

The OGP is a useful forum for advancing this networking, and the OGP European regional meeting held in Rome in October 2022, at which Access Info was present, permitted various discussions about how to improve information flows and news exchange during 2023 and beyond.

Similarly Access Info's work on the Global Data Barometer, results for which were launched in late 2022, provided a focus for data gathering, which can contribute to future, coordinated advocacy work.

4. Privacy, Personal Data Protection and Access to Information

Objectives:

- » Better balance struck in law and practice between right of access to information and protection of privacy and data protection, particularly in specific cases where the information relates to preventing corruption and ensuring accountability of decision making, while ensuring protection of personal data of private citizens.
- » Less disparity in the interpretation of the current data protection rules across Europe.
- » Improvements to be brought about through standard-setting by civil society and academics, working with information and privacy commissioners, along with use of courts to clarify transparency in specific instances.
- » Improved practice to be reinforced by eventual legislative reform to be achieved at the EU and/or national level.

One of the biggest obstacles to obtaining information needed to combat corruption and to hold power to account is the use – even misuse – of privacy protections. This was brought to stark light in November 2022 when the Court of Justice of the European Union ruled that the EU's Anti-Money Laundering Rules gave over-broad access to personal data held in beneficial ownership registers.

The beneficial ownership transparency rules will need to be redrafted but, in the meantime, access to these registers has been closed down in many countries across Europe, which will have a negative knock-on effect on this essential anti-corruption tool in many countries globally.

This ruling does give some access to “legitimate requesters” such as investigative journalist and anti-corruption organisations, which has led to public officials asking information-requesters who they are, why they want information and what they plan to do with it, something which is an interference with the basic principles of access to information and also risks the safety of certain requesters such as investigative journalists.

Another example, which Access Info worked on extensively in 2022 was accessing data on spending of the EU's Common Agricultural Policy Funds. Whilst around half of EU countries provided the data (13 countries) many others refused access to full historical data on grounds of data protection even though the EU rules only require protection of the names of farmers receiving under €1,250 in subsidies. We have launched a number of appeals to information commissioners to challenge these refusals.

Similarly, with other key anti-corruption data such as the assets declarations of public officials, which Access Info has mapped across Europe, we find huge variations in how the data protection rules,

specifically the EU's General Data Protection Regulation, is interpreted and applied in practice – there are discrepancies between countries and even within them.

To discuss how to ensure the right balance between these important human rights, Access Info has convened a Privacy Working Group, which is meeting regularly to discuss the challenges, dilemmas, latest thinking, recent case law, and the best practices.

Comprising leading lawyers, former Information Commissioners, academics and civil society, the Privacy Working Group was launched on 17 May 2022, with a discussion focusing on access to and reuse of databases containing the names of natural and legal persons. The group met again on 22 November 2022 to discuss the ramifications of the Court of Justice of the European Union ruling on access to beneficial ownership registers. We will now conduct more comparative research to inform standard-setting recommendations.

The November 2022 ruling has, furthermore, been a huge setback for Access Info, which has worked successfully to obtain information from many countries, overcoming data protection arguments, such as on spending of EU agriculture funds (some appeals are still ongoing) or a recent case to the European Ombudsman on travel expenses, but much more needs to be done. We now need to help other requesters challenge initial refusals.

There is even increasing difficulty accessing decision-making documents such as minutes of meetings because of the broad application of data protection, even though the names contained therein are of public officials.

Out of this work, Access Info has also developed a draft set of **Ten Principles on Privacy, Transparency and Integrity**. These focus on the right of access to information and the rights to privacy and protection of personal data, in the specific context of information needed for promoting integrity and accountability and preventing corruption. The principles include recommendations on transparency related to:

- » Assets and conflict of interest declarations for all public officials
- » Data on public officials responsible for decision making and/or spending of public funds;
- » Data on recipients of public funds (amounts over a certain level and/or in a professional context);
- » Natural persons engaged in decision making, such as via lobbying, and their meetings with specific public officials.

The Ten Privacy Principles are accompanied by recommendations on how to structure the legal framework and independent oversight to ensure that the appropriate balance with privacy is struck.

At end of 2022, the principles were with the members of the Privacy Working Group as well as being consulted with the UNESCO Communications Division, and with the International Conference of Information Commissioners (ICIC), both of which have expressed an interest in taking forward discussion how to get the balance right.

In 2023 Access Info will be using these principles to engage in discussion with relevant governmental actors at the international and national level, with European parliamentarians, with information commissioners, and with civil society groups, including in the UNCAC Coalition. The goal is that we can promote law reform or changes in practice as relevant and necessary so as to ensure that while personal data is correctly protected, it is not done so in a way that creates a space for corruption and unaccountable governance.

Taking forward the discussion on privacy, personal data protection and access to information in both law and practice will be a priority for 2023.

5. Open Spending Data

Objectives

- » Strong transparency requirements apply to all EU funds (direct, indirect, and shared management) at the national and/or EU level;
- » Data on national spending of EU funds is easily accessible at national level with data on most recipients available;
- » The EU has a single portal (Arachne or similar) that holds spending data and makes it available to all;
- » Standards on which data about natural persons who are recipients of EU funds are clarified (balance with privacy) and rules on reuse are clear.
- » Qualitative data on spending of EU funds at the national level (such as milestones, targets, and evaluations of use of funds) is made public by Member States (in national languages) as well as by the EU (in English and national languages).

Access Info continued in 2022 to have as a top priority the goal of making transparent the spending of EU funds in order that civil society organisations and journalists can monitor the use of these funds. This is not simply about integrity and anti-corruption monitoring: the funds are supposed to be used for specific goals, such as a just climate transition and digital transformation, and it is essential that groups working on these issues, as well as the general public, can verify that the funds are well spent.

Access Info is works on the transparency of funds in collaboration with other civil society organisations, with Access Info playing a leading role in coordinating activities.

5.1 Open Spending EU Coalition

Since 2021, Access Info helped establish and has been a leading member of the Open Spending EU Coalition. We have carried out analyses of the transparency and proactive publication obligations included in National Recovery and Resilience Plans and made specific recommendations ([see here](#)).

Building on this work, in February 2022, Access Info collaborated with the Open Spending EU Coalition to create [Guidance](#) to show Member State governments which detailed information should be published about the spending of these funds. The Guidance can also be used by civil society organisations, journalists, and others who aim to persuade their governments to be more transparent about how public money is spent.

Access Info has created a methodology which reflects the guidance, and which will be used to assess transparency of Member States RRF spending in practice.

Members of the Open Spending EU Coalition [met](#) in Amsterdam on 30 May 2022 ahead of the “Open Procurement with Impact” [conference](#). We discussed campaigns that could increase transparency in public spending at the EU and national level.

This work continued through the remainder of 2022, using the methodology to collect data in a series of EU countries, with analysis being carried out in late 2022, with a view to making recommendations and conducting campaigning in 2023.

5.2 Transparency of CAP funds

Between 2020 and 2022 Access Info submitted access to information requests for historical CAP data to all EU Member States. We requested the information under the respective national access to information laws.

In our requests, we asked for data going back to 2014 to capture all recipients of the funds since the implementation of the 2013 CAP regulation. We submitted our requests electronically, via email or third-party request platforms, to the agency or ministry responsible for implementing the Common Agricultural Policy in the country.

We found that only nine EU countries granted access to full datasets upon first request: Croatia, Czechia, Denmark, Hungary, Italy, Latvia, Slovakia, Slovenia, Sweden plus the UK. In Romania we were granted the data on second request, from another agency than the agency responsible for the yearly data publishing. Cyprus and the Netherlands shared partial data upon first request, with names of natural or legal persons redacted.

At end of 2022, a number of appeals to national authorities were still ongoing. We plan to publish a report in 2023 on the results of our investigation, with a country-by-country analysis. We will offer both national and EU recommendations to ensure transparency of CAP funds.

5.3 Transparency of EU Funds Workshop

In April 2022 Access Info participated in a workshop organised by Maastricht University entitled “The shared management of EU funds: new perspectives and challenges.” In our presentation, Access Info compared the transparency requirements under the Common Agricultural Policy Funds with that of the Recovery and Resilience Facility (RRF).

Access Info’s key concern is that the RRF transparency requirements are severely lacking at both the EU and Member State level, mainly due to the categorisation of RRF as direct management (by the Commission). As a result, Member States are considered to be the recipients of RRF funds, and precise information on the actual recipients of funds is not available at EU nor Member State level. In addition, the internal control systems of the Member States are viewed as the main instrument for safeguarding the financial interests of the Union and this is considered sufficient, without transparency permitting public oversight deemed as necessary. Access Info presented our recommendations on how to remedy this situation so as to achieve greater transparency and discussed possible solutions with academics and activists participating in the meeting.

The members of the Open Spending EU Coalition will continue to take forward Access Info’s recommendations, and we are also seeking funding to work on this and to be able to conduct more in-depth monitoring during 2023.

6. Open Data for Democracy: Global Data Barometer

Objectives

- » To map levels of open data across Europe, with a focus on anti-corruption, climate, digitalisation, health, education, and migration, as well as other data related to the Sustainable Development Goals.
- » To use the Global Data Barometer as a baseline measuring for key datasets in order to inform campaigns on both law reform and increased open data in practice.
- » To develop specific recommendations that can be used in campaigns run in coordination with other civil society and presented to bodies such as national governments, the European Union, the OECD, UNESCO, and the Open Government Partnership so as to strengthen their open data rules, policies, and practice.

A major part of Access Info's Open Data for Democracy work in 2022 was coordinating and then analysing the findings of the Global Data Barometer for the European Region, as well as contributing to the analysis at the global level.

The main European findings are:

» **Europe leads on open data but has a mediocre score**

The European region is a global leader on open data in a survey of 109 countries, and yet the 21 European countries evaluated still only score an average of 51%, with significant weaknesses including the fact that government data is not made available as open data (only 53% openness), and that key datasets needed to discuss pressing public issues, such as climate change or to combat corruption, are not available in many countries.

This is a poor result after fifteen years or more of governmental initiatives to open up data for the public good and given Europe's recognition of the multiple social, economic, and democratic benefits of digitalisation and open data.

» **Health and Covid-19 data show what can be done**

Europe did score relatively well on Health and Covid-19 data (61%), largely a result of work to collect, digitalise and publish data in almost real-time during the pandemic, showing what can be achieved where there is a need accompanied by political will. Similarly, the scores for Public Finance data (60%) and Public Procurement data (55%) reflect the emphasis that has been placed on the democratic benefits of fiscal and spending transparency.

» **Europe is failing on integrity and climate action data**

By contrast, all EU countries region scored below 50% on some other important indicators, including Company Information (49%), Political Integrity (38%), and Land data (36%) and the surprisingly poor score of only 44% for data on Climate Action. Particularly poor scores on open data included Land Tenure data (24%) and Lobbying (24%) caused, respectively, by land data only being available against payment, and lobbying data simply not existing in many countries.

» **Huge range in levels of open data across Europe**

There were also significant variations across the European region. Overall, Estonia had the highest score, with strong performers including Denmark, Finland, France and the UK. All the high scores reflected investment in the data ecosystem in these countries over recent years. Some countries, such as Italy and Spain, had strong scores on many indicators, but fell down on others, for instance Spain was strong on data capabilities but weaker on publication of data as fully open data.

For every surveyed country, it is possible to find areas where countries perform better, and areas where improvement is necessary, but consistently at the bottom of the European league table, were Greece, Lithuania and particularly Malta, which scored poorly on the evaluation of data availability in the areas of access to information, climate vulnerability, real-time healthcare system capacity, and lobbying.

» **Investment in government capacity not matched by supporting public**

European countries overall have invested well in developing online services (82%) and in digitalisation of government (81%), and quite a few countries have specific, well-funded, open data initiatives (66%) and there has been a reasonable development of digital skills (61%). That said, there is still a weakness in government support for reuse by the public (39%), which undermines the potential value of public data for entrepreneurship, participation, accountability, combating fake news, and preventing corruption.

There is a correlation between the capacities in each country and the other scores for the Global Data Barometer modules. The strongest countries on Capabilities were Estonia (92%), Spain (82%), the Netherlands (81%), France (79%), and Finland (79%), all of which have invested significantly in both open data and digitalisation more generally.

The weaker performers in terms of Capabilities were Latvia (59%), Greece (58%), Malta (57%), Croatia (54%) and Romania (53%), countries which also score badly on the actual data availability indicators, particularly Greece and Malta, confirming the finding of a correlation between capacity and outcomes.

» **Regulations make a difference**

Another key finding was that regulations make a difference, even in countries which do not have strong performance overall, such as Bulgaria (50%) or Croatia (48%), but which do have data available where there are rules requiring it. Similarly, the absence of rules means little or no data, particularly when there is no EU directive requiring that data be collected and published. Hence there were low scores for most countries on access to information data and on lobbying data, neither of which are regulated by the EU.

» **EU countries are failing to implement EU directives**

The GDB also found that not all countries have yet implemented their obligations under EU directives. For instance, company registration and ownership data is not open, in spite of being a High-Value Dataset in the EU's Open Data Directive, in part at least because of the lack of an implementing regulation from the European Commission.

Furthermore, we found that not all countries had opened their beneficial ownership registers even prior to the [22 November 2022 Court of Justice of the European Union ruling](#) which has

subsequently resulted in many countries closing down public access to these registers on grounds of personal data protection.

» **Data on climate change vulnerabilities is largely missing**

When it comes to the weak climate data, we found more information available on Emissions (61%), and Biodiversity (43%) but very little data on Vulnerabilities to climate change (28%). Whilst better than the global averages, that does nothing to justify not providing the public with greater information on these pressing 21st century challenges.

» **Publishing anti-corruption data should be an urgent priority**

Last but not least, the average score for European countries on the selected anti-corruption indicators is just 42%. Relatively stronger performers on the availability of anti-corruption data are the UK (67%), followed by Estonia (59%), France (56%) and Denmark (55%). The countries with the least data available are Lithuania (30%) and Malta (30%). The overall poor score and the wide disparity puts all of Europe at risk as illegal activity and organised crime shifts to less-well-regulated jurisdictions.

The score for beneficial ownership registers was already only 34% before a recent case from the Court of Justice of the European Union which has resulted in many beneficial ownership registers being closed to the public. Other registers needed to track money laundering and use of stolen assets are not available, notably land ownership data at only 18%.

The results, published by Access Info in December 2022, are hugely informative for setting the transparency agenda for the European access to information community in 2023 and beyond. They also provide a basis for the ATI community to work with various other sectors, such environment, health, and anti-corruption.

Importantly the results provide a basis for discussions with public officials at the national and EU level as to the necessary legal frameworks but also very much the practice. They also indicate that much more training of public official officials is needed to ensure implementation of the existing rules, while also various sectors of civil society and the general public need to be better informed and trained on how to access and use public data. These findings will feed into Access Info's strategic priorities for 2023 and beyond.

7. Company & beneficial ownership registers are more open

Objectives

- » That a comprehensive set of company registration and ownership data, including beneficial ownership data, is gathered and is made available to the public in practice, in fully searchable formats, and free of charge.
- » That there is clarity and consistency across all Member States about the rules for reuse of company registration data for a wide range of purposes by investigative journalists, civil society organisations, and businesses as well as members of the general public.

In 2022, Access Info continued its ongoing campaigning for access to open company and beneficial ownership data, something which is essential to track illicit financial flows into and around Europe, to identify corruption, to tackle tax evasion, and to expose organised crime.

In response to the war in Ukraine, Access Info welcomed the political will to sanction Russian kleptocrats but urged, that without transparency and accountability of the European financial system, these sanctions would not be effective.

In an [opinion piece](#), Access Info urged the European Commission and Member States to implement real and effective company and beneficial ownership transparency so that hidden Russian wealth could be targeted. Follow up to this article has included meetings with MEPs and coordination with other civil society organisations and investigative journalists.

Also in 2022, Access Info conducted a survey among investigative journalists to identify their top data needs, with open registers, particularly company and beneficial ownership registers, being prioritised.

The Open Government Partnership has been working for a number of years on beneficial ownership transparency, and Access Info is actively engaged in the discussions on how to advance this through national OGP Action Plan commitments.

7.1 Open Data Directive: Company Registers Campaign

Access Info continued in 2022 to lead the campaign for open company ownership under the EU's Open Data Directive. Together with the Open State Foundation (Netherlands) we coordinate a group that includes One, the Open Contracting Partnership, Open Corporates, Open Ownership, the Organized Crime and Corruption Reporting Project OCCRP, The B Team, Transparency International, and Transparency International EU.

In June 2022, the Commission published its long-awaited Implementing Regulation which significantly limited which data about company owners will be made public, in effect undermining the transparency commitment it and Member States made under the Open Data Directive. The Commission opened a public consultation on this Implementing Regulation, and the public had until 21 June 2022 to give feedback.

We urged civil society organisations, journalists, and citizens across Europe to participate in the European Commission's consultation on whether or not company registers should be open. To secure a large number of responses to the public consultation, Access Info:

- » Organised a public briefing to discuss how best to respond to this consultation to call on the Commission to truly make EU company ownership transparent;
- » Gave instructions on how to participate in the consultation;
- » Produced a template for the public to submit their own contribution to the Commission's consultation;
- » Created an online petition signed by nearly 200 organisations, journalists, academics, and individuals across Europe who support this call for transparency.

Our ongoing work in 2022 included:

- » Engage with the European Commission's group of experts being consulted on the priorities for future "High Value Datasets" under the Open Data Directive;

- » Discussing with Members of the European Parliament our concerns that the Open Data Directive is being undermined by the weak proposal from the Commission;
- » Informing EU Member States about this concern as they had also agreed to include company data as a High-Value Data Set;
- » Coordinating campaigning across Europe to ensure that policy makers are aware of the importance of open company data;
- » Raising concerns in relevant international fora, including OECD, Open Government Partnership, and meetings related to the Council of Europe's GRECO process and the UN Convention against Corruption.

7.2 Mapping EU company ownership transparency in practice (prior to 22 November 2022)

During 2022, the Access Info team carried out in-depth research on the availability of company and beneficial ownership data in each EU Member State, in order to identify which information the public can access in practice. We also coordinated with national CSOs and investigative journalists to verify how access to the registers works in practice. A report on this is scheduled for 2023.

In terms of beneficial ownership, Access Info has not only been looking at Member State compliance with the Anti-Money Laundering Directives (AMLD), but also the legal barriers that can have a negative impact on access in practice. For example, the AMLD rules:

- » Allow for registration requirements for access;
- » Allow for a payment of a fee for searching each record;
- » Do not set any standards requiring that the registers be easily searchable.

This means that, in practice, not all beneficial ownership registers are technically "open" to the public. Furthermore, not all Member States have yet fully transposed and/or implemented the AMLDs, for instance by not yet providing access or even not having set up a register.

7.3 Court of Justice Closes Beneficial Ownership Register

On 22 November 2022, the Court of Justice of the European Union on 22 November 2022 declared invalid the provision of the Fifth European Union Anti-Money Laundering Directive (AMLD5 from 2018), which requires EU countries to provide public access to beneficial ownership registers.

Access Info reacted to this with an analysis of the case and discussion with other organisations of the strategy to address this ruling, which sent shockwaves through Europe's anti-corruption and transparency communities.

Overall the Court found that AMLD5 is too loosely framed and provides for overly-wide public access to the registers without a proper justification of the necessity and proportionality of the interference with the rights to privacy and personal data protection of the beneficial owners.

Whilst recognising the importance of combatting money laundering and terrorist financing and "creating an environment hostile to criminals" through improving the Court nevertheless concluded that giving the general public access to beneficial ownership registers is neither strictly necessary nor proportionate, and so cannot justify the interference with privacy and personal data protection. The Court in effect concluded that access can only be for those with a legitimate interest, such as journalists and civil society organisations.

Access Info has taken a clear position that limiting access to beneficial ownership registers to investigative journalists and anti-corruption organisations is problematic in two senses: the first is that it will reduce significantly access for those who need the data for other legitimate purposes. The second, is the great concern that this will involve some kind of process of registration of these people, something which could be subject to abuse by less democratic governments.

Furthermore, Access Info is arguing that to be the beneficial owner of a company is to be an actor in the public sphere, and so should be subject to transparency. This is particularly the case since anonymous companies are used in the majority of large corruption cases and for laundering stolen assets.

As a result of the ruling, many countries closed their beneficial ownership registers. A priority for Access Info going forward into 2023 is to campaign for full access to beneficial ownership registers, either under the AMLD rules or other, broader, legislation, such as that on corruption to be adopted by the EU institutions.

In parallel, Access Info is looking at how to promote openness of beneficial ownership registers via other fora such as the Open Government Partnership, also the Council of Europe's GRECO mechanism and the OECD, as well as supporting the global movement on this through the UNCAC Coalition.

8. Transparency to Combat Corruption / UNCAC Coalition

Objectives

- » To promote transparency of the information needed to prevent and combat corruption, and to support the global anti-corruption in obtaining this information.
- » To improve compliance with international anti-corruption conventions such as the UN Convention against Corruption and the Council of Europe's anti-corruption conventions, along with their respective oversight mechanisms, and to contribute to identifying specific transparency requirements where these treaties are short on specific detailed obligations.
- » Specifically, to engage with the UNCAC Coalition, the global network of civil society working to prevent and combat corruption to contribute Access Info's access to information expertise so as to strengthen that specialised community.

8.1 Measuring & Mapping of Data Needed to Prevent & Combat Corruption

As noted above the Global Data Barometer Research carried out by Access Info with partners in 2022 found that, in practice, much anti-corruption information is still missing in Europe. The average score for all European countries (20 EU countries plus the UK) across all anti-corruption indicators selected by Access Info is just 42%.

We found that European countries generally scored well on the publication of budget and spending data (average of 65%) and on Public Procurement data (63%). This is in line with a strong recognition of the importance of transparency of such data for not only anti-corruption work but simply so that the public is able to know what governments are doing and to hold them accountable for their actions. Such transparency is often mandated by EU and national rules.

On the other hand, it was a matter of particular concern to find that other datasets which are essential to combatting corruption are largely missing. These include Asset Declarations (39%), and, most seriously, largely missing, Land Tenure (20%) and Lobbying data (18%). Here the absence of EU directives mandating transparency is noticeable. For instance, with no requirement to have lobby regulation or transparency, only 10 out of 21 countries surveyed published some data, and only France, Ireland and the UK published over (but only just over) 50% of the data that we were looking for.

Access Info started in late 2022 to take forward these findings in discussions with other anti-corruption organisations and with relevant EU bodies and other inter-governmental organisations. The data will provide a foundation for our engagement in 2023 in EU plans to strengthen its anti-corruption policies for Member States.

Using existing access to information rules, Access Info during 2022 regularly helped civil society organisations and investigative journalists obtain information needed to expose corruption. For instance, we worked with and trained journalists and activists linked to the Civil Forum on Asset Recovery (CiFAR) to obtain on the information that they need to track the flow of stolen funds and to promote fair asset returns.

8.2 Supporting and Leading the UNCAC Coalition

Access Info has been engaged for over 10 years, since its inception, in the UNCAC Coalition, a global network of anti-corruption organisations. As well as being a member of the Coalition,

Access Info is actively engaged in the leadership of the UNCAC Coalition, being currently on the Board (known as the CCC or Coalition Coordinating Committee) in the international organisation seat, with Helen Darbishire in her third and final year as Chair, with Rachel Hanna also engaged in the CCC work.

In 2022, Access Info continued to be actively engaged in the UNCAC Coalition, helping to promote transparency as a core aspect of corruption-prevention measures. Strategic priorities in 2022 have included:

- » **Advancing UNCAC transparency requirements:** Access Info has worked with other UNCAC Coalition groups on advocacy to advance both the requirements in the convention for states to have functional access to information rules (Article 13) and also specific corruption prevention measures such as beneficial ownership transparency. Access Info has helped coordinate discussion on this issue with other fora such as the Open Government Partnership, as well as briefing UNCAC Coalition members on key developments in Europe such as the Court of Justice of the European Union case on access to beneficial ownership registers.
- » **Transparency of the UNCAC Process:** Inspired by earlier work done by Access Info on transparency of national anti-corruption reports (the [Tell Us What You've Done](#) campaign), and with our guidance on strategy, the UNCAC Coalition launched a [global action to submit requests for information](#) from governments about their progress in implementing the Convention.
- » **Defending civic space** has been a priority after the exclusion of Access Info as one of eight organisations whose participation in the UNCAC Conference of States Parties (CoSP), held in Egypt in December 2021 was vetoed by Turkey, which accused us of being supporters of terrorism. A number of governments, including the European Union group of countries, have spoken out in our defence. Egypt has been mediating with Turkey and with us, but the issue is still not settled at year

end. Most likely this problem will lead to proposals to change the rules for future CoSP participations.

9. Information for Environmental Protection

Objectives

- » To support organisations working on environmental and climate change issues with requests for information on environmental matters and to collaborate with them on law reform to increase reactive and proactive transparency.
- » To map levels of open data on environmental and climate change issues across Europe as the basis for campaigning for greater transparency.

9.1 Mapping Open Data on Climate Change

As part of the Global Data Barometer research carried out in 2022 across Europe, Access Info identified that in Europe the average score for proactive publication of climate data was just 44%, being one of the weakest European scores for the various types of data surveyed. This research found that data on emissions was largely available (61%), while far less data on biodiversity was available (43%).

Of particular concern was data on vulnerabilities to climate change with a European average of just 28% of data available. Nine out of 21 European countries published no climate vulnerability data at all, and while some countries such as Denmark (81%) and France (75%) were better on this data, many published under 50% of the basic datasets being evaluated.

This points to a huge priority of ensuring that more data is collected, compiled and published so that members of the public can be better informed about climate change and that there can be an evidence-based debate resilient to the all-to-prevalent disinformation which circulates on social media.

Having launched this data in late 2022, Access Info is discussing with relevant organisations how to make use of it in strategic campaigns in 2023 and beyond.

One goal is to strengthen EU and national legal frameworks so that the right of access to information is effective for environmental and climate change data. For instance the 1998 Aarhus Convention is in a number of countries a separate law and not overseen by the information commissioner, something which should be addressed with law reform. We will also continue to map levels of access in practice identifying where priorities for publication should be focused.

9.2 Researching Illegal Fishing

Access Info worked in 2022 with the organisation Oceana to denounce illegal, unreported, and unregulated (IUU) fishing in the EU. The first step was to uncover EU beneficial ownership of vessels fishing under the flag of 3rd countries considered not to cooperate in the fight against illegal fishing (Cameroon, Ecuador, Panama, Sierra Leone, and St Vincent & the Grenadines).

We used data from Oceana on 46 EU-owned vessels operating under the flag of the above mentioned non-cooperating countries. This includes vessels from Denmark, Cyprus, Latvia, Malta and Spain, for which Access Info applied for beneficial ownership data from the national governments (using the AMLD5 rules still in force at the time).

Access Info identified a range of levels of access: beneficial ownership information of specific entities could be freely searched and accessed for free in Denmark (however less beneficial ownership data was available than mandated under AMLD5) and Latvia, this proved difficult in some Member States. Access to this data in Cyprus and Malta is subject to payment and restricted due to their access and search functions. Beneficial ownership information had not been made public in Spain.

After the November 2022 Court of Justice of the European Union, which [declared invalid](#) AMLD5, many Member States closed their registers to the public or insisted on requesters establishing a clear legitimate interest. Access Info tried appealing the denial of access to this information. This proved successful in Cyprus, but not in other Member States.

Access Info was able to collect some more general company ownership information on the owners of the fishing vessels, both in EU Member States and in some third countries. This research was complemented by access to information requests for information contained in Register of Ships concerning the EU owned vessels fishing under a third country flag.

Based on the data collected in 2022, Access Info and Oceana will in 2023 conduct analyses to identify concrete evidence that proves that EU owned vessels are illegally fishing under third country flags. This evidence will be used to support advocacy started in 2023 towards EU institutions urging stronger regulation and transparency is needed in this area.

10. Other Activities in 2022

During 2022, Access Info engaged in many other activities, ranging from our engagement in the Open Government Partnership at the global level, with Helen Darbishire on the Steering Committee and participating in the regional summit in Rome, to training of journalists and civil society activists, participating in many meetings, online and in person, and being part of global discussions about the right of access to information and related rights.

Some of these activities were funded, others are part of our engagement with the community. Many are referred to in passing in the rest of this report, as they are also related to activities linked to our strategic goals.

Two notable projects, with a small amount of funding from the European Commission's Erasmus programme, were to promote the right of access to information and democracy more broadly to young people.

The first was run with the Daphne Caruana Galizia Foundation with the goal of raising the awareness of young people of the benefits of exercising the fundamental right of access to information for combatting disinformation and protecting democracy.

Under this project, 45 people aged 18-30, residents of Spain and Malta, were trained and then submitted information requests across Europe on issues such as fighting corruption, tackling climate change, and advancing transparency in public procurement, migration, and gender equality. Access Info then provided

support and feedback both on the challenges that arose during requesting as well as on how to use the answers received.

The second project, the EU Democracy Rally, brought together eleven organisations from across Europe, being Austria, Belgium, France, Germany, Italy, Luxembourg, Poland, Romania, Spain and Sweden. The project provided 30 young people from these countries with a week-long, in-person training in June 2022 on the tools and skills for active citizenship, such as critical thinking, combatting fake news and disinformation, media and technological literacy, and how the EU functions.

Access Info brought to the project specific expertise on the right of access to information with a focus on how to request information from European Union institutions. We conducted a training on the EU's access to documents rules, including how to submit access to information requests on the AsktheEU.org platform.

Apart from these structured projects, Access Info regularly receives more random requests for guidance and assistance, from a range of people, including from users of the AsktheEU.org platform, from civil society activists engaged in the Open Government Partnership and UNCAC Coalitions, and from others who come across our website on the internet.

Income and Expenditure Accounts

Financial Year 1 January 2022 - 31 December 2022

This is a summary presentation in English of the original accounts prepared under Spanish law by Numéritas SL, Calle Alcalá 75 3ºIZQ28009 Madrid

Audited by

Capital Auditors Capital Auditors & Consultants, Conde de Peñalver 38, 6º E, 28006 Madrid

Income	
Adessium Foundation	100,000.00
mySociety	40,685.00
Fundación Oceána	11,900.00
The Nature Conservancy	4,031.00
Global Data Barometer / ILDA	3,546.19
El Mundo Unidad Editorial	2,780.00
Open Contracting Partnership	2,748.50
Civil Forum for Asset Recovery	2,500.00
UNESCO	2,357.00
WINGS Philanthropy Network	2,000.00
Council of Europe Moldova	1,600.00
EC Democracy Rally Erasmus Project	1,500.00
Council of Europe Ukraine	1,200.00
AsktheEU Subscriptions	960.00
UNCAC Coalition	724.70
Comunidad de Madrid	660.00
Council of Europe Moldova	612.50
EC Malta Erasmus Project	438.20
Regional School of Public Administration	400.00
European Centre for Press and Media Freedom	220.00
Institut per la Cultura Democràtica	200.00
Nuevas Narrativas Máster	153.00
Greenpeace Consultancy	121.00
Idealogia Intervención Comunitarias	86.78
Total Income 2022	€ 181,423.87

Expenditure	
Salaries	125,245.95
Office Rental	27,630.08
Accountancy	5,963.42
IT Support	3,811.50
Office Cleaning	2,922.95
Audit	2,282.21
Software, Online email, digital certificates	1,992.97
Web hosting services	1,641.30
Depreciation	1,540.97
Telephone & Videoconferencing	1,439.25
Office Utilities	1,158.15
Refreshments / Meals	947.00
Travel - Air, Train, Road	942.59
Accommodation	860.69
Office Consumables	675.13
Office Hazards Inspections & Equipment	488.99
Insurance	426.37
Bank charges	422.33
Taxes	257.84
Litigation FFF	250.00
Gifts	225.44
Office Equipment	137.46
Web Domains	93.94
Postage	36.20
Request Fees	31.14
Total Expenditure	€ 181,423.87
Balance	€ 0.00