

July 16<sup>th</sup> 2010

# Access to Public Documents

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## Introduction

Access to official documents has been guaranteed by law for seven years now. During this period, the governmental institutions have issued a number of sub-legal acts and undertook several awareness campaigns in order to implement this law in the best way possible. The non-governmental organizations and the international institutions have helped the public institutions through this entire process. However, despite all this, so far the Law on Access to Official documents has faced many difficulties in its implementation. Seven years later, the Government of Kosovo has come up with a new Draft Law on Access to Public Documents, which is expected to replace the current law and abolish all sub-legal acts currently in power. The the new law on access to public documents has been justified as a necessary law which is in line with the Constitution of Kosovo, and due to the lack of functionality of the previous law.

The Parliamentary Commission for Public Administration, Local Governance and Media has now received the new draft law for amendment and approval. In this policy brief we will present our problems that we face while claiming access to official documents and provide recommendations on the improvement of the new Draft Law on Access to Public Documents.

## Advancements in the Draft Law on Access to Public Documents

The Draft Law on Access to Public Documents looks more advanced in various aspects compared to the previous law. These modifications include:

- Shortening the deadline for responding to initial requests from 15 working days to 15 calendar days. This shortens the waiting time for at least 4 days (as now Saturdays and Sundays won't be counted).
- Shortening the deadline for responding to confirmed requests from 15 working days to 7 working days.
- Institutions must have the responsible units/officials to handle the requests for access to official documents.
- Obliging public institutions to publish as much information as possible in electronic form on their official websites on the internet.

## Drawbacks of the current law and possible problems with the new law

Besides the above mentioned aspects that further advance the Law on Access to Official Documents, during the past 7 years of the laws existence, the following aspects were most problematic: payments for access to public documents, registries, requests for legal acts, requests in electronic form, contact information of the officials in charge for reviewing requests, reporting to the Ombudsman and legal proceedings. We will briefly elaborate each of these problems below.

### Payments for accessing public documents

The current law (article 9.2), and the provisions on the new draft law as well (article 20), foresee the payment for access to official documents. While the payment required for services offered by museums is reasonable, any kind of payment to access public documents is not necessary and this part should be removed from the Law on Access to Public Documents.

The provision that citizens need to pay for written copies of public documents, in the past was misinterpreted by the public institutions themselves. GAP Institute can provide two examples of such cases:

#### Example 1:

On January 20<sup>th</sup> 2009, GAP Institute required access to three documents from the Municipality of Malisheva: the number of personnel working in the municipal administration, qualifications of school teachers and access to minutes of the Municipal Assembly. For each of these documents, our researchers were required to submit written requests. The written requests were charged 1 Euro for each request<sup>1</sup>. We have received the following response to our

<sup>1</sup> The payment request to access official documents was also confirmed by the mayor of the Malisheva himself Mr. Isni Kilaj, in the TV debate "Life in Kosovo"

requests: one answer in electronic form, a 8 page document and the minutes of municipal assembly which surpass 20 page. Since the current law foresees that only documents which go above 20 pages must be paid for with a reasonable printing fee, the Municipality of Malisheva has also requested payments for the responses in electronic format.

**Example 2.**

In May 6, 2010 GAP Institute filed a request at the Ministry of Trade and Industry (at the Agency for Business Registration) whereby we required the total number of all registered businesses in Kosovo according to municipalities. We were charged 3.5 euro only for submitting the request. On the invoice issues it states that the payment is done for 'Information inquiry'. Out of 3.5 euro, 2 euro was charged for submitting the request, 0.5 euro for a single page and 1 euro banking fee. (See annex 1)

Payment discourages citizens who want access to public documents but who do not have the financial capabilities to pay for it. How the payments should be made is yet another question, should it be through the bank or directly at the institution where the request is submitted? If the public institutions demand the payments be made through the bank, this mean that the one submitting the request will have to pay extra. Besides the fee of documents one is requesting, the person has to pay an additional 1 euro to the bank as a processing fee. On the other hand, if payments are made in the public institutions, this might bring another problem, management of cash.

In order to avoid these problematic practices, it is necessary that the new Law on Access to Public Documents does not require payments for access to documents. While all the documents are drafted in electronic form, the responses of the public authorities could also be delivered in an electronic form. If the submitter of the request needs to have access only to written documents, it should be his/her responsibility to find a solution for printing or copying the official documents outside the public institutions.

## Registries

The current law obliges the public institutions to keep registries of public documents<sup>2</sup>. However, these registries were never kept properly by the public institutions. During various research activities of GAP Institute and many requests submitted to local and central institutions (mainly ministries and municipalities), we were never granted access to public document registries. None of the Ministries or Municipalities of Kosovo has a registry of public documents published in their internet websites. In this aspect, the Law on Access to Official Documents failed to be implemented correctly.

The new Draft Law on Access to Public Documents does not require the existence of public documents registries. Keeping public documents registries such be a legal

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<http://video.google.com/videoplay?docid=-3031751211263137627#>, where he also expressed his gratitude towards the municipality officials who follow the municipal rulebook to the point.

<sup>2</sup> Article 10 of the Law on Access to Official Documents.

obligation, hence be included in the new Law on Access to Public Documents. Registries are useful for public institutions and for the ones submitting requests as well. In case of an unclear or poorly drafted request, the official in charge can help the submitter of the request by offering them the registry of all public documents they have available. Publishing these registries would eliminate unclear requests, and it would enable citizens to request access to documents of interest, for the existence of which they would not otherwise be aware if it wasn't listed in the registry.

**Example 3.**

On March 19<sup>th</sup> 2010, GAP Institute has submitted a request to the Office of the Prime Minister (OPM) for access to all strategies approved before January 2008, which are still implementable. We were obliged to formulate the request in that way, due to the fact that governmental decisions before January 2008 are not published. In the absence of a registry of these decisions, we were unable to identify the specific titles of these strategies.

On April 23<sup>rd</sup> 2010, (long after the deadline of 15 working days), we received the following response from the OPM:

*Dear Sir,*

*After reviewing the request submitted on 19.03.2010, nr. 623, by GAP Institute for Advanced Studies, for access to all strategies approved in this period from the OPM, and based on the provisions of the Law No. 2003/12 for Access to Official Documents, article 5, paragraph 5.2 and 5.3 as well as the Administrative Directive No. 3/2006 for Implementation of the Law on Access to Official Documents, we inform you as follows:*

*The request submitted by GAP Institute needs to be clarified and name the precise strategies or strategic documents request, always having in mind the number, volume, and the time period of the strategies approved by the Government of Kosovo.*

*Respectfully Yours!*

In the absence of a registry, we are unable to know the titles of the strategies, their approval dates, or the time period as to when they should be implemented.

## Requests in electronic form

The current law (article 5.1), and the new draft law (articles 4.2 and 6.1) give equal importance to both written and electronic requests. However, this is not always true in practice. Based on our experience while submitting various requests to access official documents, the requests in electronic form were not taken into consideration and a written request was required instead. According to the public officials, the written requests are the only valid requests. The reasoning behind this statement was that requests in electronic form are difficult to be classified as requests. Based on this excuse, the submitter of the request is not certain if his request has been accepted, whereas for the institution it is difficult to prove that they have responded to the request according to the law. The non-acceptance of

requests in electronic form has also been linked to the non-existence of the Law on Electronic Signatures.<sup>3</sup>

Based on our experience, public institutions often refuse requests in electronic form, but they prefer to provide their responses in electronic form. Usually, after sending the official response, the institution requires from the submitter to confirm receiving the response. The confirmation is done by returning an e-mail to the sender's address. The same procedure can and should be used when a request is submitted. The recipient of the request (the public institution) should return a response stating that the request has been accepted and it will be reviewed within the foreseen legal deadline. Technological advancements make it possible for all this to be done automatically, without having the responsible official return an answer for the acceptance of the request for every request received.

## Request for legal acts

The Draft Law on Access to Public Documents obliges public institutions to publish legal and sub-legal acts in electronic form (Article 15, paragraph 2.4). The publication of legal acts is also specified with the Law on the Official Gazette. However, not all legal acts currently in power are published in electronic form. Many sub-legal acts are not published in the Official Gazette. The Office of the Official Gazette within the OPM, justifies the non-publication of these sub-legal acts as the Law on the Official Gazette does not oblige them to do so. For the administrative directives which are not found on the Official Gazette, a request must be submitted. A very small number of municipalities publish their regulations, and the ones who do publish them, do not publish all their regulations. For example, in most Municipality websites, the Regulation on Property Tax and the Regulation for Taxes, Fees, Fines and Permits cannot be found even though they are two of the most important municipal regulations.

The requirement to submit a written request in order to gain access to legal acts is absurd. Legal acts regulate public life, and based on them, the citizens know their rights and obligations. During our research work, we have submitted many requests to various municipalities in Kosovo to gain access to municipal regulations, as well as requests to the Office for Administration of the Official Gazette in order to gain access to some of the administrative directives which are not published.<sup>4</sup>

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<sup>3</sup> Even though this draft law was part of the Legislative Strategy 2010, it was removed from the strategy in July 2010.

<sup>4</sup> The latest example of a submitted request for access to administrative directives is the one dating July 7<sup>th</sup> 2010, when we requested access to the Administrative Directive No. 2007/07 of the OPM on the principles, procedures and classification marks of official documents. This administrative directive is mentioned in an OSCE publication on the implementation of the Law on Access to Official Documents ([http://www.osce.org/documents/mik/2007/11/27791\\_sq.pdf](http://www.osce.org/documents/mik/2007/11/27791_sq.pdf)), but it is not published anywhere. The officials of the Office for Administration of the Official Gazette could not secure this administrative directive for us. On May 2009, GAP Institute has submitted a request for access to Administrative Directive 18/2005, on the Veterinary Control of Importing, Transit Passing of Food and Non-Food Products of Animal Origin from Live Animals and the Material for the Insemination of Animals, but we never received a response to our request.

The Law on the Official Gazette which was approved at the Assembly of Kosovo on June 4<sup>th</sup> 2010, does not oblige the Office for the Administration of the Official Gazette to publish sub-legal acts. According to Article 4, paragraph 2.8 of this Law, sub-legal acts of the Government and its Ministries are published in the Official Gazette only when requested by the Prime Minister. According to this paragraph, the Official Gazette will continue not to publish all sub-legal acts. The Assembly of Kosovo needs to amend this article and require that all sub-legal acts of the Government and its Ministries are published in the Official Gazette, same as the laws, international agreements, decisions of the Constitutional Court and Presidential decrees. Likewise, the Ministry of Local Government Administration (MLGA) should require from Municipalities to publish all municipal regulations and decisions in electronic form, while the Parliamentary Commission for Public Administration, Local Governance and Media should monitor this process.

### Contact information of the responsible officials for reviewing requests

The Administrative Directive 3/2006 for the implementation of the Law on Access to Official Documents obliges the public institutions to appoint an archive officer or responsible officials who will handle the gathering, administration and preservation of public documents, as well as accept requests for access to these documents<sup>5</sup>. The requests are submitted in a written or an electronic form. As the names, contact information and electronic addresses of the responsible officials are not made available to public, these institutions are making it impossible for the citizens to submit electronic requests since they do not have a clear address where they would direct their requests. Even though almost all the public institutions have their own websites on the internet, a very small number of them contain all the necessary contact information of its officials. This fact represents a major obstacle for submitting electronic requests.

### Complaints when access is denied

Based on the current law and the new draft law, in cases when a positive response is not received according to the law, the submitter of the request may file a complaint to the Ombudsman or file a lawsuit in the competent court. Despite of many problems that those who submit requests faces, when the access is not granted still a very small number of complaints is submitted to the Ombudsman Office. In the last two years, only two complaints have been filed after the denial to access official documents<sup>6</sup>. However, even the annual report of the Ombudsman expresses the concern regarding cases of violation of legal rights when trying to access official documents, claiming that such cases are more common than the ones reported. The non-reporting of cases where the right to access official documents has been violated, can be explained as follows: 1. The

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<sup>5</sup> Article 15 of the Administrative Directive 3/2006 for the implementation of the Law on Access to Official Documents.

<sup>6</sup> Ombudsman Institution. 9th Annual Report 2008-2009, directed to the Assembly of Kosovo.

largest number of requests for access to official documents comes from civil society organizations and media, for which, besides the interest to access official document, the time period when they receive a response for their requests is highly important; and 2. Lack of trust that the Ombudsman Institution can find a solution to their problems<sup>7</sup>. The non-compliance of the public institutions even towards the Ombudsman Institution itself, discourages the complainers to submit a complaint for the non-fulfillment of their legal right to access official documents.

The submitters of requests reserve the right to file a lawsuit against a public institution in the competent court as well. The resolution of administrative cases, a category which also includes the complaints regarding the non-fulfillment of the legal right to access official documents, falls under the competences of the Supreme Court, or to a Municipal Court if the case is transferred there from the Supreme Court. There are currently 217.758 cases pending in courts throughout Kosovo<sup>8</sup>. There are no data as to how many court cases regarding the non-fulfillment of the right to access legal documents have been resolved in a judicial process. However, the inefficiency of the judiciary may discourage the submitters of the requests to file lawsuits.

Most of the democratic countries have set similar complaint procedures such as the ones in Kosovo – complaints to the Ombudsman or filing a lawsuit in a competent court of law<sup>9</sup>. Some other countries have established special commissions to review such complaints (Belgium, France), or the complaints are made directly to the Information Commissioner (Canada)<sup>10</sup>. Different countries have chosen different ways to address complaints for this issue. The public institutions in Kosovo need to investigate the causes of the small number of complaints submitted to the Ombudsman and the number of court cases. If the results show that these public institutions lack trust from the citizens, than its necessary to find more efficient methods for the resolution of this problem. One option would be to establish a special state commission which deals only with the reviewing of complaints regarding the non-fulfillment of the legal right to access official documents. The inclusion of the right to access official documents in the Constitution of Kosovo, is an additional obligation for the public institutions to implement this law. Otherwise, the citizens may also refer to the Constitutional Court for the resolution of these cases.

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<sup>7</sup> According to 2009 statistics, the public institutions have not responded to letters from the Ombudsman in 96 cases (the Courts in 37 cases, the Municipalities in 38 cases and the Ministries in 21 cases). 9<sup>th</sup> Annual Report 2008-2009, directed to the Assembly of Kosovo.

<sup>8</sup> Secretariat of the Kosovo Judicial Council. First quarter 2010 – statistics of regular courts.

<sup>9</sup> For a comparison of laws on access to official documents in different countries, see the publication by Privacy International Report: "Freedom of Information Around the World 2006 – A Global Survey of Access to Government Information Laws". ([http://www.justice.tas.gov.au/\\_data/assets/pdf\\_file/0004/118930/Table\\_of\\_Global\\_Comparison\\_of\\_FoI\\_Laws.pdf](http://www.justice.tas.gov.au/_data/assets/pdf_file/0004/118930/Table_of_Global_Comparison_of_FoI_Laws.pdf)).

<sup>10</sup> The Information Commission in Canada is an official appointed by the Parliament, with an exclusive duty to review the complaints for cases regarding the non-fulfillment of the legal right to access official documents.

## Classified Documents

The current Law on Access to Official Documents talks about classified documents as well. This issue is further advanced by the Administrative Directive 03/2006 on the Implementation of the Law on Access to Official Documents. This directive, which is still in power, classifies documents as follows: sensitive, unlimited, limited (internal), confidential, personal, secret and top secret. However, now that the Law on Classification of Information and Security Clearance is in power, the Draft Law on Access to Public Documents does not cover this issue anymore but refers to the respective law instead.

In practice so far, the public institutions have not conducted legal practices regarding classified documents. None of the public institutions in Kosovo has a list of classified documents. Some institutions argue that all documents are accessible to the public and there is no need for the existence of a list of classified documents<sup>11</sup>. On the other hand, there are governmental documents which collide with the Law on Access to Official Documents; such as the case with the Rules of Procedure of the Government of Kosovo. Based on this article, the Government of Kosovo has never made public the minutes from the meetings of the Government of Kosovo. This is contrary to the current Law on Access to Official Documents, to the contents of the Draft Law on Access to Public Documents and the Law on Classification of Information and Security Clearance. According to the Law on Access to Official Documents, documents may only be classified in cases when if that document is made public it would jeopardize the political security, national security and military matters, international relations, or financial/monetary/economic policy of the public institutions. Publishing minutes of Governmental meetings does not jeopardize any of these issues or other issues mentioned in the respective law. Similarly, in the Law for Classification of Information and Security Clearance, meeting minutes cannot be classified as confidential documents. Therefore, the Parliamentary Commission for Public Administration, Local Governance and Media, should require from governmental institutions to modify the contents of their procedure regulations, such as the Rules of Procedure of the Government of Kosovo, which is contrary to the current Law on Access to Official Documents, and to the upcoming Law on Access to Public Documents as well.

Another example of failure to respect the Law on Access to Official Documents, in the case of classified documents, is the non-publishing of a Contract between the Government of Kosovo with the Bechtel&Enka consortium for the construction of the Vërmicë-Merdare highway. According to the Ministry of Economy and Finance (MEF), this contract was not made public as it contains financial/business secrets of Bechtel&Enka. Based on the current Law on Access to Official Documents, article 4, the public institutions may forbid access to official documents in cases when the commercial interests of a physical person or a business entity are jeopardized. However, paragraph 7 of Article 4, states: "if only parts of the requested documents are affected by any of the expectations, the remaining parts

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<sup>11</sup> Fisnik Minci. Regional Municipalities of Prizren hesitate in allowing access to official documents. "Koha Ditore", June 22nd 2010.

of the document are made public". According to this paragraph, in the case of the highway contract, MEF should keep the parts of the contract that contain financial secrets of the companies working in the highway as secret, and make the remaining part of the contract available to the public. GAP Institute has submitted a request to access the contents of the highway contract on March 29<sup>th</sup> 2010. Since that time we have not received a clear response to our request, although we clearly specified that we only request access to non-secret parts of the contract, based on the current Law on Access to Official Documents.

The Law on Classification of Information and Security Clearance, article 4, clearly outlines on which cases can official documents be considered as classified (secret). In all paragraphs of Article 4 of this law, the classification of information has to do only with Kosovo security secrets and in no case with financial/business secrets of physical or business entities. Hence, according to this law, MEF has no legal right to hold secret any part of the contract with the Bechtel&Enka consortium, or any other contract of this category.

## Labeling the Law

Besides changes in content, the new draft law differs from the current law in its name as well. The Law on Access to Official Documents has been labeled as the Law on Access to Public Documents. In the draft law and the explaining memorandum, no reasons are given for this change. Article 3 of the draft law, the part which outlines definitions, presents the labels "official" and "public" as synonyms. "A public document means any official document" (article 3, paragraph 1.2). Whereas the label "official document", means, including but not limited to, all information registered in any form, written or received and kept by public authorities. An official document is any kind of paperwork which serves to prove or confirm something, without taking into consideration its physical form or its characteristics, written or typed text, maps, schemes, pictures, drawings, sketching, working materials, as well as sound recordings, with voice, magnetic or electronic, optical recordings or video recordings of any form, and as a transfer equipment for automatic data processing with installed memory or a transfer equipment for archiving of data in a digital form (in the text below: a document) (article 3, paragraph 1.3).

Different countries have different labels for the laws dealing with freedom of information, such as: the Law on the right of information for official documents (Albania), The Federal on the Obligation to Offer Information (Austria), The Law on the Right to Access Administrative Documents (Belgium), the Law on Access to Official Information (Bulgaria), etc. Since an official information can also implicate an un-registered information (written, recorded, etc.), labeling the law as the Law on access to official information is more adequate and eliminates every possible misunderstanding regarding the format and content of the required information.

## Conclusions and Recommendations

The Law on Access to Official Documents has not been implemented to a satisfactory level, as some of the above mentioned examples clearly demonstrate. Replacing the current law with a new law, which does not differ much in content with the current law, is not a solution to the problem of the non-implementation of the current law. If the public institutions do not show greater willingness to implement this law, there is a potential risk that the new law will be even less implemented than the current law. This could happen due to the fact that with the new law, the public institutions undertake more obligations than with the current law and the legal time for responding to requests has been shortened.

The areas of the law which were least implemented during the past 7 years are: the payment to access official documents, maintaining and publishing of registries, the appointment of responsible officials who would contact with the citizens regarding access to public documents, electronic requests etc.

In order to avoid these difficulties in the future, GAP Institute recommends the following:

1. The payment for access to public documents should be removed from the new Law on Access to Public Documents;
2. The public institutions should be obliged by law to draft, maintain and publish the registries of public documents;
3. To specify in the law that all legal acts (laws, administrative directives and municipal regulations) must be published in electronic form. The public institutions should direct the citizens as to where the legal acts can be found, but in no way should the citizens be obliged to submit a written request to access these documents.
4. In order to be able to submit requests in an electronic form, it is necessary that every website of public institutions lists the electronic address of the responsible person/unit for accepting requests for access to public documents. It also necessary that the public institutions publish in their websites, the full contact information of the responsible officials of all their departments.
5. To find more efficient solutions for complaints regarding access to official documents, such as establishing an office or a specific commission to review these complaints. Experience so far has shown that citizens have hesitated to complain to the Ombudsman. Likewise, the inefficiency of the courts to solve even greater cases, discourages citizens to think that the same courts can solve cases regarding the non-realization of the right to access official documents.
6. To avoid cases when regulations are in contrary to the Law on Access to Official (Public) Documents, such as the case with the Rules of Procedure of the Government of Kosovo. The existence of a specific commission for handling requests for access to official documents and the practices of

public institutions in this field, could take into evaluation even the contents of these documents such as the Rules of Procedure of the Government of Kosovo, and evaluate whether it is in compliance with the Law on Access to Official Documents.

7. Since official information can also exist in an un-registered form, the Parliamentary Commission for Public Administration, Local governance and Media should analyze the possibility to label the law as the Law on Access to Official Information.

## Annex I: Examples of laws on access to official documents (informations)

Almost all democratic countries have laws in power which guarantee access to official information. Below we're presenting a table with some democratic countries from the Region, Europe and the rest of the world, as well as their laws which guarantee access to official documents/information. The comparison has been made by focusing on the labeling of the law, its primary content and overseeing institution<sup>12</sup>.

Country	Law	Primary Content	Overseeing Authority
Albania	Ligji për të drejtën e informimit për dokumente zyrtare	<ul style="list-style-type: none"> <li>• Every person has the right to access official documents, including personal information of key public officials;</li> <li>• Institutions must reply with a response within 30 days from the date when the request has been received;</li> <li>• Governmental agencies are obliged to publish their address, functions, competences and their work procedures;</li> </ul>	Ombudsman
Austria	The Federal Law on the Obligation to Offer Information (1987)	<ul style="list-style-type: none"> <li>• Federal authorities are obliged to provide an official response within 8 days after the request has been received;</li> <li>• The requests may be in written or verbal form and its not mandatory to provide reasons for the request;</li> <li>• The 9 parts of Austria should develop similar laws.</li> </ul>	Administrative Court

<sup>12</sup> For more information on other countries and their laws on access to official information, please refer to the following publication "Freedom of Information Around the World 2006 - A Global Survey of Access to Government Information Laws" which can be found at this address [http://www.justice.tas.gov.au/\\_data/assets/pdf\\_file/0004/118930/Table\\_of\\_Global\\_Comparison\\_of\\_FoI\\_Laws.pdf](http://www.justice.tas.gov.au/_data/assets/pdf_file/0004/118930/Table_of_Global_Comparison_of_FoI_Laws.pdf)

Belgium	The Law on the Right to Access Administrative Documents (1994)	<ul style="list-style-type: none"> <li>• Everyone, with no exceptions, has the right to access official documents;</li> <li>• On 1993, the Constitution was amended to guarantee the freedom of access to official information;</li> <li>• A response has to be provided within 30 days. The response should also include the authority which is reviewing the request and the procedures for complaint;</li> <li>• Official documents cannot be used for commercial issues.</li> </ul>	The Commission for Access to Official Documents
Bosnia	The Law on the Freedom to Access Information (2004)	<ul style="list-style-type: none"> <li>• It is applicable in every form of information available;</li> <li>• Access to official documents is allowed to physical and business entities, within and outside the country;</li> <li>• Institutions are obliged to provide a response to the requests, within 15 days;</li> </ul>	Ombudsman
Bulgaria	The Law on Access to Official Information (2000)	<ul style="list-style-type: none"> <li>• Access to official information is guaranteed for all information of governmental agencies funded by the state budget;</li> <li>• The requests may be in written or verbal form (In 2004, more than 74% of requests were verbal);</li> <li>• Information which has to do with preparatory work, negotiations, opinions etc., may be kept as secret for 2 years max;</li> <li>• Governmental agencies are obliged to publish their decisions, functions, responsibilities and contact information.</li> </ul>	Administrative Department within the Supreme Court
Canada	Law on Access to Information (1983)	<ul style="list-style-type: none"> <li>• Canadian citizens as well as temporary citizens of this country, including corporations (business entities) have the right to access official documents;</li> <li>• "data" means letters, memorandums, reports, pictures, films, microfilms, plans, drawings, diagrams, maps, video and audio recordings;</li> <li>• Institutions are obliged to provide a response within 15 days;</li> <li>• Report: (The largest number of requests come from the overall public, whereas only 11% comes from the Media);</li> </ul>	The Information Commissioner

**Annex II: Evidence of a payment made to access official documents**

UFP PRISHTINE		DF-01	
Fletë Depozim / Payment Order			
BEN / Përfituesi	UFP	Lokacioni	0134
Përshkrimi	Ministria e Tregëtisë dhe Industrisë	Operatori	473
Unirof Acc.: 1000-4000-700024.11	Uniref Name: Ministria e Tregëtisë dhe Industrisë		
UNIREF	MTF6D0000000003D	Cash	2.50 EUR
Emri Mbie, Kompania	"INSTITUTI GAP"	Proviz.	1.00 EUR
Përshkrimi	KERKES PER INFORMAT	Total	3.50 EUR
Nr.Serik,Nr.Faturës	0034919	In words (total)	tri dhe 50/100
URDHERUESI 50204			
MTI Ministria e Tregëtisë dhe Industrisë			
Deklaroj			
DATA: 06.05.2010	Adresa: Rr. "Rexhep Mala" nr. 18 • 10000 Prishtinë • NRB: 80073291		
	Tel: 038/243-9695 • Fax: 038/243-9696 • www.ufp-ks.com		
	Nënshkrimi digjital		
Klienti		Punëtori	



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