

Sustainable Development Goals: On or off track?

Assessing the progress through freedom of expression and information

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Introduction

The right to freedom of expression and access to information (freedom of expression) is considered to be an enabling or “empowerment” right. It is important not only by itself but it also enables human rights to be protected and exercised. It allows people to claim other human rights and demand access to essential services and participate in decision-making affective their lives.

The right to freedom of expression is considered a key element of sustainable development. It has been integrated in the [UN 2030 Agenda for Sustainable Development](#) (the 2030 Agenda) and has been recognised as an enabler for public engagement across the [Sustainable Development Goals](#) (SDGs). It was also explicitly incorporated into the SDG Goal 16 which aims to “promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels.” Additionally, it was implicitly incorporated into many other goals and targets. The 2030 Agenda also includes two separate indicators for the Goal 16.10.

The year of 2023 marks the midpoint towards achieving seventeen SDGs, as unanimously agreed by all UN member states. However, as demonstrated in the [latest SDG progress report](#), the world still has a long way to go to meet the SDGs by 2030. This is also the case of Goal 16 target 10 which, as noted, concerns the right to freedom of expression.

In this briefing, ARTICLE 19 assesses what has been the progress of achieving the Goal 16 as well as whether and how it contributes to achieving all SDGs in general. The briefing also identifies gaps and weaknesses in the current international processes that monitor States’ progress in meeting Goal 16.10 as well as on the commitment-making processes at the national level. Finally, it provides recommendations for States and other stakeholders on how to ensure more effective implementation of the 2030 Agenda.

ARTICLE 19 hopes this briefing will contribute to the discussions at the forthcoming [SDGs Summit](#) in September 2023 and will help the States and broader international community in determining what must be done to make the most out of this stocktaking moment.

Global Progress on SDG 16.10.1: attacks against journalists

SDG Target 16.10: “Ensure public access to information and protect fundamental freedoms, in accordance with national legislation and international agreements”.

Indicator 16.10.1. monitors “number of verified cases of killing, kidnapping, enforced disappearance, arbitrary detention and torture of journalists, associated media personnel, trade unionists and human rights advocates in the previous 12 months.”

ARTICLE 19’s assessment: Serious improvements needed to meet the target

According to available information, overall number of killings of journalists had been declining since 2015 globally; however it has risen again in 2022. For instance:

- According to the [ARTICLE 19 Global Expression Report](#), 87 journalists were murdered in 2022 – 33 more than in 2021 – including 19 in Mexico and 10 in Ukraine.
- The Committee on Protection of Journalists (CPJ) has [also reported](#) that at least 67 journalists and media workers were killed in 2022, the highest number since 2018 and an almost 50% increase from 2021.
- Reporters without Borders (RSF) [reported](#) killings of 61 journalists and media workers in 2022.

An earlier decline in the number of killings of journalists indicated a very slow progress towards meeting the target; the progress that was clearly thwarted in 2022. But even prior the recent spike of physical attacks, ARTICLE 19’s assessment has always been that the reality was far more complicated.

The number of the most serious physical attacks on journalists (killings) should never be considered to be sole indicator of the state of protection. In fact, ARTICLE 19 observes that an overall state of protection of journalists, human rights defenders, whistleblowers and protesters is worsening. We would like to highlight the following problems.

Reporting on physical attacks: data available only about killings of journalists

First, ARTICLE 19 notes that the way in which Indicator 16.10.1 is formulated does not allow to capture the full picture of attacks against journalists, human rights defenders and others.

We are concerned that the reporting under this indicator only focuses on the most serious attacks, that is killings of journalists. However, the evidence shows that journalists are victims of numerous other forms of attacks, such as kidnappings, enforced disappearances, arbitrary detention and torture. There is no official monitoring of these other forms of physical attacks. We note that UNESCO, the institution tasked with the monitoring this goal, also focuses only on killings of journalists in its reporting.

Compared to states' and UNESCO's reporting on Indicator 16.10.1, [monitoring from civil society organisations](#) has shown discrepancies in the data reported by states. For example, during the Covid-19 pandemic, [ARTICLE 19 uncovered](#) that a record number of journalists were jailed because of their work in 2020. This included crackdown on journalists reporting on the pandemic: ARTICLE 19's [Global Expression Report for 2021](#) documented that many countries have used public health measures to impose restrictions on the media and repress critical voices including attacking media and cracking down on online censorship. Also, [CPJ reported](#) that the number of journalists imprisoned increased during the Covid-19 pandemic. [CPJ also warned](#) how in 2022 the number of journalists in prison reached a new global high of 363 with an increase of 20% compared to 2021.

ARTICLE 19 therefore recommends that official data are produced for all crimes listed in Indicator 16.10.1, not just killings, that these are included in the reporting. UNESCO in particular should collect this data. Reporting should also reflect the information collected by civil society organisations. These should complement official statistics. Any discrepancies between data provided by States in their voluntary reporting (VNRs) should be highlighted.

No reporting on other forms of attacks

Apart of limited data on physical attacks, ARTICLE 19 notes that the scope of Indicator 16.10.1 does not capture other risks faced by journalists and other media professionals. These should include various forms of legal harassment (including through strategic litigation against public participation), or online harassment and abuse. There are also no specific data about special challenges faced by women journalists and minority groups at risk of discrimination.

For instance, [according to data collected by ARTICLE 19](#) and [by the International Federation of Journalists](#), between [half](#) and [two-thirds](#) of women journalists have experienced gender-based [harassment](#) and abuse. We [also found](#) that women journalists from marginalised groups are [targeted](#) more often. Therefore, we believe that data on these and other forms of threats and intimidation, health risks, regional variation and variation in risks to journalists within different types of conflict settings, including in emerging crises such as the escalation of the interstate war in Ukraine, are necessary for more effective monitoring of Goal 16.10.1.

ARTICLE 19 therefore recommends that the reporting on attacks should be comprehensive and should include all types of attacks that journalists face, both online and offline. Special consideration should be paid to various forms of attacks against women journalists and groups at risk of discrimination. This monitoring should be done on the basis of dedicated methodology.

No monitoring and reporting on the state of impunity for physical attacks

ARTICLE 19 believes that in addition to monitoring and reporting number of crimes and attacks against journalists (both online and offline), it is equally important to consider the

rate of impunity for any attack considered. Attacks against journalists take many forms. States persistently fail to act against those responsible for these attacks, investigate these crimes, prosecute and condemn perpetrators and instigators of attacks. The failures to investigate and hold perpetrators and instigators to account have pernicious effects on freedom of expression. It creates an environment where there is a tacit acceptance by governments of crimes against journalists. The failure to recognise attacks as being in virtue of their journalistic work also serves as an injustice to victims and undermines our ability to fully understand threats to media freedom.

[ARTICLE 19 global work](#) shows that the high rate on impunity is typically due to state agents being perpetrators or instigators of these crimes, especially during critical moments for democracies such as elections. For example, in Brazil during the 2018 election, [we documented](#) that journalists were harassed, threatened and physically attacked but there was limited condemnation from government officials. Similarly in Kenya during disputed elections in August 2017, there has been numerous attacks against journalists and media workers trying to report on political issues and the protests. No police officer involved in these attacks was held to account. [Our research also shows](#) that in Mexico, the rate for impunity of attacks against journalist is above 99%.

These examples demonstrate that looking at attacks against journalists without looking at impunity provides a very limited picture on the protection of freedom of expression. Monitoring on the level of impunity for attacks would bring greater accountability for states.

ARTICLE 19 believes that the reporting must include comprehensive information about the state of impunity for aforementioned attacks. This should include but not be limited to the number of proceedings initiated to bring perpetrators and instigators to justice, results of such proceedings, the length of the proceedings and other information.

Global Progress on SDG 16.10.2: access to information

SDG Target 16.10: “Ensure public access to information and protect fundamental freedoms, in accordance with national legislation and international agreements”.

Indicator 16.10.2. monitors “number of countries that adopt and implement constitutional, statutory and/or policy guarantees for public access to information.”

ARTICLE 19’s assessment: Partial progress but considerable improvements needed to meet the target

Target 16.10 can be split into two distinct requirements. The first requires states to adopt legislative and policy guarantees pertaining to public access to information. The second aspect focuses on the implementation of such legal guarantees.

As for the first aspect, ARTICLE 19 notes that there has been substantial progress in the recognition of access to information in national laws around the globe. This includes comprehensive laws and national policies, sectoral laws, and constitutional rights. According to [ARTICLE 19’s monitoring](#):

- Currently, 135 countries have access to information laws or policies; 96 States have the right explicitly recognised in their constitutions. This means 91% of the world’s population lives in a country where they can formally request information from a state or a local authority.
- As of June 2023, 127 countries have adopted comprehensive laws which set out legal rules on access to information held by government bodies (so-called right to information, freedom of information or access to information acts).

This progression has involved countries at different stages of development and political systems such as Argentina, Brazil, Ethiopia, Indonesia, Iran, Nigeria, Mongolia, Sudan, Tunisia, Kenya, Palau, and Lebanon. This shows positive progress and continuation of a trend that had started in early 2000 when states showed an accelerating interest in promoting openness in their activities.

The adoption of dedicated access to information laws has been accelerated through global multi-stakeholder initiatives. These include [Open Government Partnership \(OGP\)](#), [Open Contracting Partnership \(OCP\)](#) or [The Extractive Industries Transparency Initiative \(EITI\)](#). These initiatives have established good practices and successful collaborative processes between governments and international or local civil society organisations to promote more transparency. For example, by advocating and promoting open contracting, OCP has shown the key role played by right to information laws in pushing governments to publish and use open, accessible and timely information on government contracting.

ARTICLE 19 therefore concludes that the SDG indicator 16.10.2 has certainly reinforced states' commitments to fulfil their obligations and to adopt specific right to information legislation by the end of the 2030 Agenda.

Despite these positive developments, the progress towards meeting the target has been slow.

ARTICLE 19 wishes to highlight the following issues.

Lack of clarity on measuring Indicator 16.10.2

At the outset, ARTICLE 19 notes that Indicator 16.10.2 is not clear in terms of measuring the objectives it sets. Namely, it does not say how many countries should adopt the right to information law by 2023 for the Goal 16.10.2 to be reached. For instance, it does not say that by 2030, the Goal will be met if 85% of States adopted comprehensive right to information laws.

We observe that this lack of clarity makes it rather difficult to assess the success of this Target. We recommend that this is clarified when SDG 16 is reviewed next at the [High Level Political Forum \(HLPF\)](#), the central UN platform for the follow-up and review of the 2030 Agenda and its SDGs at the global level.

Lack of clarity on the nature of right to information framework that should be adopted

Indicator 16.10.2 only refers to the “adoption” of legal guarantees by national law in relation to the right to information. The Indicator lists various types of legal guarantees- from constitution, statutory and policy guarantees – but does not elaborate whether all or some of these should be adopted.

ARTICLE 19 notes that this is an extremely weak formulation that does not capture the complexity of the issue. We note that while constitutional provisions on right to information give recognition to the right, further legislation on how these guarantees should be implemented in practice need to be put in place. We observe that in number of countries, e.g. in Africa, national constitutions recognise the right of access to information but states fail to adopt dedicated right to information laws that would provide framework for implementation of such guarantees.

This lack of more detailed specification of requirements under this target presents problems for its assessment. States can report that they met the Indicator 16.10.2 simply by adopting general constitutional guarantees of the right even if they did not give further legal protection to the right in national legislation. This results in skewed presentation of real situation on the ground and often makes the right to information illusory in practice.

ARTICLE 19 recommends that the depth and breath of legal protection of access to information should be assessed more thoroughly. Namely, Indicator 16.10.2. should be

considered met only if States adopted protection of the right both in their national constitution as well as in a dedicated right to information law.

No assessment of 'quality' of right to information laws

The Goal 16.10.2 focuses solely on adoption of guarantees to right to information. Apart of highly superficial nature of this goal (see above), there is no specification as for the quality of adopted legislation. Namely, it does not require states to adopt a comprehensive law that would meet all the requirements of international standards in this area.

ARTICLE 19 notes that assessment or evaluation of the adopted law against international standards is a complex exercise. We recommend that such assessment should be in place and should be conducted in the next period of Agenda 2030 implementation. It should, at minimum, include the following:

- The number and types of public bodies or bodies exercising public functions that are covered by the right to information law. ARTICLE 19 believes that these should include all branches and levels of the government including local government, elected bodies (including national parliaments), bodies which operate under a statutory mandate, nationalised industries and public corporations, non-departmental bodies (quasi-non-governmental organisations), judicial bodies and private bodies that carry out public functions (such as those maintaining public roads or operating public transport) or hold decision-making authority or expend public money;
- Whether the legislation provides for the obligation of maximum disclosure about key structures, decisions and activities of public bodies. This should consider whether the law provides for a presumption that all information held by public bodies is subjected to disclosure and that this presumption can be overcome only in very limited circumstances. This means public bodies have an obligation to disclose information and every member of the public has a corresponding right to receive information. Hence, assessment should also look if this right is available to all persons, regardless of citizenship and residence;
- Whether the legislation provides for processes of requesting and responding to right to information requests. It should look at whether individuals can file an information request without the need to demonstrate a specific interest in the information or explain why they wish to obtain it. When public bodies deny a request, they should justify the refusal at each stage of the proceedings. This should include also the assessment of whether there is a right to appeal against rejections of right to information requests and whether there is a possibility of judicial review of decisions;
- What exemptions does the law provides for refusals of right to information requests, whether these exemptions are narrowly formulated and limited to specific grounds set in international and regional human rights standards. Assessment should also consider whether non-disclosure is justified on a case-by-case basis. Restrictions that apply to

protect governments from embarrassment or the exposure wrongdoing including human rights violations and corruption can never be justified.

- Whether there is a dedicated oversight body that is tasked with overseeing, monitoring and reporting the implementation of the right to information framework. The assessment should not just look at the existence of an oversight body but consider whether this body has financial independence and it has been provided with the sufficient resources (material and human) to carry out its functions. Assessment should also look at whether the body has political independence, meaning that is not subject to the political direction of the government.
- What is a broader right to information framework. This should include assessment of the obligation of public authorities to properly maintain their records, to promote awareness on right to information, or to build of relevant public officials responsible for the implementation of right to information laws.

No assessment of the level of implementation of right to information laws

Monitoring and measuring whether and how are the right to information laws implemented is crucial for having a full picture of the effectiveness of the right to information framework.

ARTICLE 19 believes that in order to see if people can rely on right to information in practice, the monitoring must analyse the activities of the institutions in charge of the implementation of the law. This should cover both relevant state institutions as well as oversight bodies. It should examine whether public institutions are truly transparent or what are the barriers preventing transparency (such as certain cultural or societal norms). Such assessment should be a complex understating, requiring an on-the-ground assessment of a multifaceted institutional, bureaucratic and social.

We observe that despite the indication of the implementation in the text of the Indicator, there has never been any measurement or evaluation when reviewing states' progress towards reaching Goal 16.10.2.

ARTICLE 19 recommends that in the next stage of implementation of Agenda 2030, the monitoring of SDG 16.10.2 should look at the practices of national bodies on how they implement RTI laws, if they have conducted efforts to achieve greater openness and transparency with reports and statistics on the implementation of the law at all levels of the governments, including municipalities, and on responses rates including refusals. Such assessment should allow to measure progress from a culture of secrecy towards achieving open governments.

The lack of comparative data

ARTICLE 19 also observes that there is an overall lack of comparative data to measure progress towards achieving SDG 16.10.2.

UNESCO is the custodian agency for global monitoring of SDG 16.10.2 as appointed by the UN General Assembly in September 2015. UNESCO sends a [questionnaire](#) with 8 specific questions to national right to information oversight bodies (in 2021 the questionnaire had 9 questions; in 2020, it had 20 questions). The responses from national authorities then form the basis for the UNESCO reporting. The [monitoring conducted by UNESCO](#) is far from being effective as it is based on this self-assessment by states. Here, we see several problems.

- First, not all the states provide information to UNESCO about their progress. Although the number of responses is increasing (e.g. in 2022 survey, 123 UN member states and territories responded as compared to only 65 in 2020), the number of countries that have not responded is very high and does not allow to only partially measure global progress.
- Second, the states do not provide the most up to date data. For instance, in 2021, according to UNESCO reports, only 40 out of 102 responding States had data for 2020. The remaining states claimed they could not collect any data due to the pandemic and were only able to provide data for 2019 or 2018. There is no way then to know and measure how national authorities have been coping with implementing right to information laws in general and in context of the Covid-19 pandemic in particular.
- Third, in the UNESCO questionnaire, only 3 (out of 8) questions relate to the implementation of right to information laws. This should be the key focus of the survey while UNESCO survey mainly focuses on the existence of legal guarantees and of an oversight body. We believe this is a loose approach as we have illustrated above. Only by effectively monitoring the implementation of the law, real progress of SDG 16.10.2 can be assessed.
- Fourth, UNESCO report says which countries have responded to its questionnaire but it does not specify which countries have responded. Basically, the report only states that a certain percentage of countries responded to the survey; it also states how many countries adopted the right to information law. It does not specify how individual countries responded to the questionnaire and what information they provided. For example, Mexico got top marks in the UNESCO survey but there is no access to the responses submitted by Mexican authorities. Mexico's scores in the UNESCO report present a very different picture from the [evaluation that ARTICLE 19 has conducted](#) on the implementation of the right to information law across all Mexican states. As responses are not published or accessible, there is not accountability on Mexico on what information it has provided to UNESCO.
- Last but not least, UNESCO assigns a score to each country. These scores are not published by UNESCO in its report but were [released upon a request from the media](#) for the 2022 survey. The scores for the 2021 survey were not disclosed. UNESCO argues that surveys are meant to identify trends and not to score countries. This is a very weak approach that lacks of transparency and accountability on the states as well as on UNESCO and doesn't allow to have a meaningful and effective monitoring of progress to meet Goal 16.10.2.

Similarly, to the issue of attacks against journalists, the [civil society](#) organisations also developed methodologies to monitor progress on SDG 16.10.2 and gathered non-official data. These methodologies are more comprehensive as they focus on both the quality of right to information laws and their implementation. For example, [one methodology](#) uses 61 different indicators grouped into seven main categories to assess whether the legal framework reflects international standards governing right to information and the effectiveness of implementation. The civil society thus developed specific indicators to support and integrate the weak formulation and monitoring on progress on Target 10.2.

ARTICLE 19 therefore recommends that monitoring on implementation of right to information laws should be strengthened in the next period. The experience of civil society methodologies could serve as useful reference point. In particular, we urge the UNESCO to be more transparent and publish responses to its survey received by national institutions and include more questions that will allow to measure the implementation of the law. The reporting should also include non-official data on right to information laws produced by the civil society into monitoring mechanisms for SDG 16.10.2. Data provided by local CSOs should complement official data and information to highlight discrepancies between data provided by states in their voluntary reporting (VNRs).

Freedom of expression and information and other SDGs: global progress

The inclusion of SDG 16.10 into the 2030 Agenda on Sustainable has been a landmark moment that has recognised freedom of expression as a key element of sustainable development. Despite this incorporation, the 2030 Agenda has missed to explicitly recognise the enabling nature of this right. ARTICLE 19 has long argued for such recognition and has been highlighting strong links between freedom of expression and economic, social and cultural rights – particularly the right to water, health, clean environment, and education.

ARTICLE 19 believes that failure to mainstream freedom of expression through the whole 2030 Agenda and through all SDGs is a serious omission. This lack of consideration of the interlinkages of SDG 16.10 with other SDGs has a direct impact on the slow progress towards achieving the 2030 Agenda.

Although we are not in a position to assess the progress of other SDGs, we would like to demonstrate this through the following examples.

- The lack of access to information has an impact on progress towards meeting [Goal 4 \(Education\)](#) and [Goal 3 \(Good health and wellbeing\)](#): The lack of access to information prevents groups at risk of discrimination from challenging structural obstacles and in access to education and contributes to greater prevalence of illiteracy in these groups. For example, [ARTICLE 19 found that in Chiapas](#), Mexico, women in indigenous communities suffer a high level of poverty and cannot access information in their native language about social programs, health, education, land and territory relating to large development projects and public services. The barriers to access information for women in Chiapas exacerbated during the pandemic where they remained totally uninformed about the Covid-19 outbreak as authorities were releasing information only in official language, recommended guidelines for containment, which facilities could aid in case of serious symptoms and access to vaccination. [In Tunisia, ARTICLE 19 found](#) that rural women in the south west region of Gafsa and Kebilli are mostly illiterate and cannot access information about health services, as health service providers were publishing information on a digital platform that rural women could not access.
- The lack of access to information has impact on the progress towards meeting Goal 3 (Good health and wellbeing) in relation to critical health services, in particular **reproductive, maternal and child health services**. For instance, [in Brazil, ARTICLE 19 documented](#) that women had to face several obstacles and barriers to access information and abortion treatments such as accessing basic information on under which circumstances a woman is allowed to access abortion and to how and where these procedures are performed. ARTICLE 19 research conducted directly with healthcare professionals show that only 50% of 34 healthcare facilities disseminate official information on abortion services for victims of sexual violence (one of the circumstances under which abortion is legal in Brazil).



ARTICLE 19 therefore recommends that States consider importance of access to information in meeting all SDGs and incorporates improving access to information into their strategies for achieving these goals. This is crucial and urgent in order to achieve real progress and meaningfully meet the Agenda 2030 on Sustainable Development.

Recommendations

Mid-way through the implementation of the 2030 Agenda, the need to accelerate progress towards achieving SDG 16.10 on freedom of expression and to information is evident. ARTICLE 19 makes the following recommendations in order to improve the progress in the remaining period of Agenda 2030.

States should

- Produce official data for all crimes listed in Indicator 16.10.1, not just killings of journalists and include them in the reporting.
- The reporting under Goal 16.10.1 on attacks against journalists should be comprehensive and should include all types of attacks that journalists face, both online and offline. Special consideration should be paid to various forms of attacks against women journalists and groups at risk of discrimination. This monitoring should be done on the basis of dedicated methodology.
- The reporting under Goal 16.10.1 should include comprehensive information about the state of impunity for attacks. This should include but not be limited to the number of proceedings initiated to bring perpetrators and instigators to justice, results of such proceedings, the length of the proceedings and other information.
- Allocate additional resources to UNESCO in order to increase its capacity to conduct a more effective and comprehensive monitoring of SDG 16.10.1 and 16.10.2. UNESCO should also collect and publish comparative data and establish official partnerships and contributions with CSOs that are conducting monitoring globally, regionally and/or locally.
- Agree to review SDG 16 every year at the HLPF in light of its broad scope and the crucial role as enabler to meet all SDGs.
- Consider importance of access to information in meeting all SDGs and incorporates improving access to information into their strategies for achieving all SDGs.

The international community should

- Reaffirm and reflect the integral role of the right to freedom of expression, information and participation in advancing the SDGs in the Political Declaration of the 2023 High-level Summit. The Declaration should explicitly recognise a critical role of freedom of expression for achieving all the other SDGs (including education, health, water and sanitation, land, gender, climate action, infrastructure and connectivity).
- At the SDG Summit in September 2023, include direct references to SDG 16.10 in the Summit Declaration and recognise its critical and enabling role for achieving all the other SDGs. The programme of the SDGs Summit should also recognize the central nature

of SDG16 for the 2030 Agenda by featuring it as a key theme for the Summit overall, with SDG16 integrated throughout the agenda and sessions of the Summit.

- Recognise the key role of civil society in the implementation of the Agenda 2030 and ensure meaningful participation of the civil society across the Summit.

UNESCO should

- Ensure that when reporting on killings of journalists, the monitoring includes non-official data on the safety of journalists collected by CSOs that would complement official statistics and serve to highlight discrepancies between data provided by States in their voluntary reporting (VNRs). These discrepancies should be highlighted.
- Monitor instances of all crimes against journalists, not just killings of journalists, on the basis of a dedicated methodology.
- Monitor and collect data on impunity for attacks against journalists. This should include but not be limited to the number of proceedings initiated to bring perpetrators and instigators to justice, results of such proceedings, the length of the proceedings and other information.
- Thoroughly assess the existence of legal guarantees for the right of access to information and only consider SDG 16.10.2 has been met if a law has been adopted and this framework establishes a process to request or publish information in compliance with international freedom of information standards.
- Measure the quality of the right to information laws. The quality should be based on with international standards on access to information and include issues such as scope of the legislation, processes to make and respond to right to information requests and appeal procedures, the scope of exemptions, the independence of oversight bodies, and overall mechanisms to promote the law.
- Be more transparent and publish responses to its survey received by national institutions. It should also expand the scope of the survey (i.g. include more questions) and focus also on the level of implementation of national legislation.
- Include non-official data on right to information laws produced by the civil society into monitoring mechanisms for SDG 16.10.2, in particular data provided by local civil society organisations. These should complement official data and information. Any discrepancies between data provided by States in their voluntary reporting (VNRs) and these unofficial data should be highlighted.