**4. INITIATIVE 2020 MEETING**

**12-13th October 2023, Dubrovnik**

 **The members of Initiative 2020, at their 4th regular annual meeting held in Dubrovnik on 12th and 13th October 2023, discussed the achieved standards of conduct of national institutions in charge of the right of access to information, as well as the open questions on the application of the right to individual requests and proactive publishing of information. Particular emphasis was put on the "silence of the administration" issue and the abuse of the right of access to information.**

 **Thereby, the Members of Initiative 2020 issue the following**

**JOINT COMMUNICATION**

**1. To ensure the correct and efficient application of the rights, the users of the Law governing the right of access to information are recommended to fully and consistently apply the achieved and confirmed standards of the national institutions responsible for supervising and protecting the rights in this area.**

**2. "The silence of the administration" derogates citizens' right to access public information. In the legal system, efficient mechanisms should be found to sanction the responsible persons of the public authorities who often ignore the citizens' demands.**

**3. Abuse of the right of access to information by incorrect information requesters significantly burdens the work of public authorities and directly harms the exercise of the right of access to information. The purpose of these requests is not to ensure transparency, openness and control of the government but to disrupt the work of public authorities, or such a request has a profitable purpose. Such behaviour is impermissible, extremely harmful to the right to access information and turns it into its opposite.**

**Therefore, within a national framework, it is necessary to legally regulate the institute of abuse of the right to access information, i.e., wrongful use of the right.**

**4. The next meeting of Initiative 2020 will be held in 2024 in Montenegro.**

**MEMBERS OF THE INITIATIVE 2020**

**Dubrovnik, October 13, 2023.**