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Free Access to Environmental Information in Turkey

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1. Constitutional framework

The constitution does not include an explicit right to access to environmental information, instead it contains the right to information in a general context under article 74 (as amended by the law No 5982 in 2010) as "Everyone has a right to access information, and apply to ombudsperson". Therefore this Article includes environmental information as well.

2. Other national legal acts and relationships with the re-use directive

The Right to Information Act (*Bilgi Edinme Hakkı Kanunu*-BEHK) No 4982 (as amended with the law No 5432 in 2005) is the main law about the issue. It is enacted in October 2003 and entered into force on 24 April 2004, six months after the date of its publication in the official gazette *(Resmi Gazete*). It covers general provisions with regard to the procedures and the basic requirements on the right to information. The details with regard to that right are regulated through the By-law on the Procedures and Basis for the Implementation of the Right to Information Act *(Bilgi Edinme Hakkı Kanununun Uygulanması Hakkında Yönetmelik*- BEHY, 27.4.2004). However that by-law does not include details concerning several significant issues such as exceptions to the right to information. The main reason of that fact is that the main laws with regard to some exceptions as state secrets, trade secrets and the protection of personal data were not enacted yet, and consequently, that issues cannot be regulated through by-laws without referring to the main laws.

There is no specific regulation directly related to the right to environmental information. Even the Environment Act 1982 (*Çevre Kanunu*- ÇK) does not contain a detailed provision on the issue. It refers to the BEHK in its Article 30 (as amended with the law No 5491 in 26.4.2006) as stating that "Everyone has the right to access environmental information in the scope of the Right to Information Act No 4982 and dated 9.10 2003". It is regulated in the same Article that if the disclosure of the information will harm the environmental values as rare species the requested information would be rejected. On the other hand environmental information with regard to the projects subjected to environmental impact assessment can be obtained during the assessment process under the relevant by-law.

BEHK does not include a provision about the re-use of public sector information; indeed the relevant directive of the EU has not been transposed jet. On the other hand there is lack of official public data as data banks at the administrative level. Only indirect provision under BEHK is related to the information and documents that are already published or disclosed to the public under its Article 8. According to that provision public authorities have discretion to not make the subject of an application to information for those kinds of information or documents. However the public authorities are required that the applicant will be informed of the date, the means and the place of the publication or disclosure of the information or document.

3.Legal situation before Directive 90/313/EC and before the Right to Information Act 2003.

There was not any regulation explicitly dealing with the issue before the BEHK was enacted in 2003 let alone before Dir. 90/313/EC. The right of petition, the freedom of information and press, and the right to a fair trial under the Turkish Constitution have served as major legal bases to ask mostly the personal information from the relevant authorities in a limited extend. Consequently, the regulations on the right to information were enacted to transpose the European legislation concerned

not only the environment but other areas including human rights into national legislation as part of the negotiation process with the European Union on the membership of Turkey to the Union.

4. Statistical information

All public authorities are required to prepare annual reports on the applications for access to information made previous year, and sent to the below mentioned Council that is established as an appeal body until the end of February every year. The Council prepares a general report and submits it to the Turkish Grand National Assembly (TBMM) every year until the end of April together with the reports received from institutions. These reports are disclosed to the public by the presidency of the TBMM in two months. The reports should contain the statistical data related both to the applications received, accepted- answered, rejected, and to the appeals to the decisions. In practice it is not possible to reach that reports from the web sites of the relevant authorities including the Council. Only the general reports can be reached from the website of the TBMM. The report for 2014 is not available jet. Additionally, that reports include information with regard to the right to information in general. According to 2013 general report prepared by the Council the total number of appeals to the Council is 2047 (totally accepted 442, partially accepted 382, and rejected 1059 (BEDK: 2013 Report, 3).

The published general reports only include the numerical data, and they do not cover any information about the applicants or the subjects of applications, and it is not possible to reach the reports prepared by the public authorities dealing with environmental issues. That kind of information only can be obtained through examining the published decisions of the Council. However, ironically, currently it is not possible to reach those decisions since the Council does not publish its decisions anymore. Even the previously published decisions of the Council were removed from the relevant official websites.

Several difficulties facing administrative bodies for instance lack of personnel as well as training, and other problems associated with providing the requested information are pointed out in the report prepared as a concluding document of a workshop organized by TBMM (TBMM: Onuncu Yıl, 2013). However that report does not contain either a systematic explanation with regard to difficulties or detail data about workload of the public authorities.

5. *Definition of environmental information*

There is no detailed definition for environmental information in the relevant regulations. That can be considered as a consequence of the facts that Turkey neither directly transposed the EC Directive 2003/4 into a specific national regulation nor is a party to the Aarhus Convention. Therefore the only definition with regard to environmental information is provided in Article 2 of ÇK in a broad and general context, not including the wording of 2003/4/EC. That definition is as "every kind of available information and data that are in the form of written, visual or sound recording concerning water, air, land, flora and fauna, and activities affecting or possibly to affect that elements as well as administrative and technical measures".

On the other hand the definition of information as a general term in Article 3 of the BEHK is also valid for environmental information since that law has a general nature covering whole administrative field. The words of "information" and "document" are defined separately. Information is defined as "every kind of data that is within the scope of this law and are included in the records of the institutions". The definition of document stated in the same Article is as follows: "Any written, printed or copied file, document, book, journal, brochure, etude, letter, software, instruction, sketch, plan, photograph, tape and video cassette, map of the institutions and the information, news and other data that are recorded and saved in electronic format that are within the scope of this law".

6. Right holder-without having to state an interest

The right holder is specified under Article 4 of the BEHK as "everyone has the right to information". Applicant is defined in the same Article as "all natural and legal persons who apply to the institutions by way of exercising the right to information". Thus BEHK does not include the term "without having to state an interest" contrary to the relevant EU Directive. Indeed, under the generally

accepted rules of law that requirement should be assumed to exist since the BEHK does not require any condition or limitation for the right holder either. However, in spite of that fact, public authorities have rejected various demands on the ground that the applicants do not have an interest. Luckily, the appeal council has overturned those rejections on the ground that every Turkish citizen has a right to access information under the BEHK.

BEHK grants the right to information to foreigners in the second paragraph of the same Article in a restrictive way. According to that provision only foreigners domiciled in Turkey and the foreign legal entities operating in Turkey can exercise the right to information on the condition that the information that they require is related to them or the field of their activities, and on the basis of the principle of reciprocity.

7. Obligations for private persons performing public administrative functions or providing public services. Fish Legal

The definition of the term public authority does not in line with Directive 2003/4/EC. That term is described in general terms under the relevant laws and there is not any specification with regard to the obligations of private persons concerning information in general let alone environmental information. Indeed, that term is convenient for a broad interpretation to include private companies having public functions and responsibility or performing public services. However there is not any published official data indicating such a broad interpretation, and in fact, public authorities are tending to interpret that term in a restrictive way. The issue is very significant since the privatization has been one of the main policies of the AKP (Justice and Development Party) Government since it came to power in 2002. Consequently there are various private entities that provide public services or produce public good and service as electricity and natural gas distribution companies. A recent initiative of the Government is the privatization of public owned thermic power stations. Therefore all that companies are currently considered out of the scope of the BEHK.

Public authorities to be addressed by applicants are defined under Article 2 of the BEHK as "public institutions and the professional organizations which qualify as public institutions". The issue is more clarified under Article 2 of the relevant by-law. The central administration and, their affiliated, related or associated organizations, local authorities except villages, and their affiliated, related or associated organizations and associations or companies, the Turkish Central Bank, universities, and all public institutions and agencies, enterprises, and professional organizations are included into definition in this Article. According to the literal meaning of these articles judiciary cannot be considered as a public authority unless it acts in an administrative capacity. Additionally, the provisions of three Codes concerning criminal, civil and administrative jurisdiction procedures are exempted from the BEHK under the Article 20/last paragraph of the BEHK. According to the decisions of the appeal council judiciary can be obliged to disclose information only for those information that is related to administrative matters (BEDK: 2005/257, 15.04.2005, 307).

On the other hand professional organizations acting as public institution are also defined in Article 135 of the Turkish Constitution. That Article also emphasizes that those public professional organizations shall be subject to administrative and financial supervision of the State as prescribed by law. The major examples of those organizations are the commercial, industrial and agricultural unions as well as bars.

The issue was more clarified under the review process by the competent courts. For instance the Council of State judged in a dispute that the banks having majority of public share cannot be placed out of the Right to Information Act (*Danıştay* 10. D., 30.06.2010, E. 2009/16100, K.2010/5836- unpublished). However the interpretation of the term of public authorities is far from being sufficiently clarified jet.

8. Public authorities' obligations to make information available

Public authorities must possess or should have possessed due to their tasks and activities the requested information to be responsible for disclosure according to the definition of information, and Article 7 of BEHK. Where the requested information or document is at an institution other than the one that is applied the petition will be sent to the relevant institution and the applicant will be notified

accordingly. The institutions may turn down the applications for any information or document that require a separate or special work, research, examination or analysis (BEHK, Art. 7; BEHY, Art.12).

As it is mentioned above, the information and documents that are published or disclosed to the public through several means as publication, brochure, and proclamation may not be made the subject of an application. However in that case applicants should be informed of the date, the means and the place of the disclosure or publication (BEHK, Art. 12; BEHY, Art. 13).

Information or documents which the date of availability has already been announced cannot be disclosed before the date specified if the premature disclosure will undermine the public interest or result in personal benefit (BEHY, Art.12/3.par.)

In a case with regard to a demand concerning whether there is an initiative on the assessment of ecosystem of a cave where the species protected under the Bern Convention lived, has been refused by the relevant authority on the ground that there was not any document or even opinion at the time. The appeal council confirmed the rejection arguing that the definition of information and document under the relevant law does not cover such a demand The appeal Council has indicated that it has not any other choice but to trust the statement of the relevant public authorities (BEDK: Kararlar, 2005/740, 19.10.2005).

9. Access conditions: Terms and practical arrangements related to the EC/2003/4 Article 3/3-5

Applications of an abstract and general nature are not processed and will be notified to the applicant according to Article 18/last paragraph of the BEHY. There is no explicit requirement for the public authorities to ask applicants to specify their requests regarding the applications that are formulated in too general a manner under that Article. However if the requested information or documents are not sufficiently clear or understandable on the application petition or form relevant public authority may inform the reasons of indetermination to the applicants and ask for additional information from them. In that case, 15 days' time period starts after the completion of determined deficiencies (BEDY, Art.16).

Public authorities are obliged to notify applicants or inform them in electronic format of the result of their applications for access to information. In the case that documents are requested, public authorities must give a certified copy of the required document to the applicant. Information or documents in electronic format can be sent via electronic mail, discs allowing data copying or other means. Where the information or document is not appropriate for copying or copying may cause damage to the original document the institution will provide the applicant following options. To examine the original document and take notes for those that are published or written, to listen to the material that are in the form of sound recording, and to watch the material that are in the form of visual recording. For this purpose, the applicant will be informed of how, where and when access will be provided and other necessary considerations within the time period. In that situations applicants should be supervised by at least one officer and necessary precautions are taken against the risks as the information or document being changed, destroyed or stolen. If the access to information requires other means than those mentioned above, such information shall be provided on condition that it does not damage the original document (BEHK, Art. 10; BEDHY, Art.19).

All public authorities are required to take administrative and technical measures to provide every kind of information and document, with the exceptions set out in the relevant law for applicants. They are also obliged to review and decide on the applications for access to information promptly, effectively and correctly under Article 5 of the BEHK.

The application not being answered during the period specified due to negligence or culpable conduct on the part of the public officials dos not eliminate the obligation to provide a response. In the case of rejection of the request the applicant must be notified of the reasons and the appeal mechanisms against the decision as well as time limits for appeal (BEHK, Art.12; BEHY, Art. 18/para. 7 and 8).

Several provisions regarding measures, practical arrangements, assistance and training are formulated in detail particularly under the BEHY to assist to applicants and to make sure that the right to information used efficiently. Public authorities are obliged to designate information units, and appoint enough number of staff to these units. It is essential that these units have physical space and technical equipment necessary to facilitate the application (BEHY, Art. 8/1-6 para.) Information unit

staff is obliged to help applicants in exercising their rights under the law. In that context the staff will give information upon how the application is made and will point out any deficiencies in the petition or form to the applicant at the time of application and will provide guidance in how to rectify them (BEHY, Art.15, and 8/4 para.).

The terms for access to information are specified as within 15 working days starting from the application date, and at the latest within 30 working days in certain circumstances as the applied institutions needs time to make information available. In the latter the applicant will be informed of the extension and its reasons within 15 working days (BEHK, Art. 11).

10. Charges for providing information

The applied institution may charge the applicant for the cost of procedure, to be added as an income to the budget (BEHK, Article 10; BEHY, Article 22 as amended in 31.10.2005). That means the relevant institution cannot ask any fee where there is not any cost for supplying information and document. The numerical details of charges are regulated in the Circular on Tariff for Access to Information (*Bilgi ve Belgeye Erişim Ücreti Genel Tebliği, Resmi Gazete* 14 February 2006) published by the Ministry of Finance. According to those regulations, in general, it is under the discretion of relevant public authorities whether to charge for the costs to supply information to the applicant. However it is clearly indicated that no fee including the related post costs can be charged for the first ten pages of the copies. On the other hand charges could be applicable for any documents beyond ten pages including for electronic documents if the public authorities had to conduct research and spent time for copying, reviewing, and compiling the information requested. In those cases charges should be proportionate with the real costs for as copies, posts and other financial expenses, and should not be exceeded the amount of real costs. To prevent the use of charge as a deterrent tool by the public authorities, the amounts of the fees were specified in the Circular according to the various means for supplying information as photocopy and printing, research, reviewing and complying and communication. Applied institutions should inform the applicant about the amount of charge as well as where and to whom payment must be made within 15 days from the date of application.

11. Copyright claims

There is no available information about claiming copyright in the material supplied by the public authorities. However there is a requirement for the applicants that information and documents that are obtained from the relevant authorities according to the BEHK in the process of accessing to information cannot be duplicated and used for commercial purposes. They cannot either published without the consent of the institution they were provided by. For those who violates that requirement will face the criminal and civil penalties (BEHK, Art. 29; BEHY, Art.42). In that situation the public authorities can neither claim user fees to give consent for publication nor to keep requested information from being disclosed to prevent the abuse of disclosure since that provision is not listed among exceptions. It is clearly indicated in an opinion- decision of the appeal Council as a response to a demand for opinion by the Atomic Energy Institution that the use of information by the applicant for commercial purposes cannot be considered in the scope of secrecy, and the requested information should be provided (BEDK: 2005/244, 15.04.2005, 297).

12. Affected third parties: protection of personal data

Affected third parties can only involve in the access procedures to give consent for disclosure of the information or document which are related to their personal situations. The information or documents that are related to the administrative investigation and held by the public authorities were listed among the exceptions on the access to information in the case that they will clearly violate the right of privacy of the individuals (BEHK, Art. 19/a; BEHY, Art. 30/a). Additionally, the privacy of individuals is out of the scope of the right to information as any information that will unjustly interfere with the health records, private and family life, honor and dignity, and the economical and professional interests of and individual unless the concerned person has consented to the disclosure of the information to the public (BEHK, Art.21; BEHY, Art.32).

On the other hand intellectual property is defined among exceptions under the BEHK (Article 24). This article only indicates that for access to information concerning intellectual property the relevant provisions of the intellectual property law shall apply. I can suggest that the public authority can ask the affected third person for consent in those cases as well. However there is not available decision or judgment to support that kind of interpretation. Contrary, in a case related to a claim for obtaining a protection project and report concerning a cultural place protected under the relevant environmental law the public authority has rejected the demand on the ground that the project owner has an intellectual property, and that refusal was approved by the appeal council based on the same reason protecting the project owner without asking any information from the public authority (BEDK: Açıklamalı Kanun, 2015, 111-116).

13. Exceptions on access to information

a. Confidentiality of commercial or industrial information

The information and documents that are qualified as commercial secret in various laws, and the commercial and financial information that are obtained by the public authorities from the real or legal persons within the condition of keeping secret are defined among the exceptions of the right to information under the relevant law (Article 23 of BEHK).

b. Confidentiality of the proceedings of public authorities, and internal communications

The information and documents of the public authorities that do not concern the public and are solely in connection with their personnel and the internal affairs are classified among the exceptions of the right to information unless they affect the staff who worked in those institutions (BEHK, Art.25).

c. Materials in the course of completion or unfinished documents or data

There is no provision related to raw data under the relevant regulations, and none available data regarding application process.

According to the relevant regulations the institutions may turn down the applications for any information or document that require a separate or special work or examination, and for information or document that are in the course of completion (BEHK, Art.7; BEHY, Art.12). There is not any detailed explanation on the issue.

d. Information on emissions into the environment

There is not any provision under the relevant regulations or any available public data including judgments of the appeal bodies on the issue.

e. State secrets: International relations, public security, national defense

The requests for providing information concerning the state secrets are considered out of the scope of the right to information if disclosure of the information or documents would clearly cause harm to the security of the state or foreign affairs or national defense and national security (BEHK, Art.16). However the interpretation of the state secrets is among the major problems in practice since there is not a framework law including the detailed definitions and guiding rules. The only provision that is Article 47 of the Criminal Procedural Act does not clarify the issue since it mainly covers the same provision as Article 16. That fact, indeed gives excuse to public authorities to interpret that exception in a broad way. The relevant appeal council interprets the issue differently according to the specific characteristics of every case. However there is not an available decision or judgment on the interpretation of state secret in the context of environmental information.

f. Weighing of interests

There is not any requirement or guidance as how to carry out balancing under the relevant legislation with regard to the weighing of interests in every particular case taking into account the public interests served by disclosure and the interests of nondisclosure. It is only stated in the Article concerning the privacy of individuals that due to public interest considerations personal information or documents may be disclosed by the institution on the condition that concerned person is notified of the disclosure at least seven days in advance and his/her consent is obtained (BEHK, Art. 21/ second para).

In a case that is not directly related to an environmental issue, the appeal council turned down the refusal of a demand for access to information based on the exception with regard to the privacy of the individuals. The Council has decided that the public authority cannot solely based on the first paragraph of that provision, he must also take into account the public interest prescribed in the second paragraph, and the requested information should be provided to the applicant on the condition of obtaining the required consent since the application for access to information is related to the sale of a public institution and there is a public interest to disclose that information (BEDK: Açıklamalı Kanun, 2015, 537; BEDK: Kararlar, 2005/484, 22.06.2005, 468).

14. Judicial control of access decisions

***a. Specialised administrative body*:** The Council of Review of Access to Information – hereinafter the Council (*Bilgi Edinme Değerlendirme Kurulu*- BEDK) is established under the BEHK (Art. 13, 14), and the details are defined in both the BEHY and the By-law on the Working Procedures and Principles of the Council of Review of Access to Information. The Council composed of nine members appointed by the Council of Ministers amongst members nominated from the Court of Appeal and Council of State; scholars of criminal, constitutional and administrative law; select members of Turkish Bar Association, and judges. The Council convenes at least once a month or anytime upon the call of its president when there is need. The Council can set up commissions or working groups may invite representatives from the ministries, non-governmental organizations and other institutions to participate in the meetings as it finds appropriate.

Appeal to the Council is not compulsory. Applicants whose requests for access to information are rejected can either appeal to the Council within fifteen days starting from the official notification or bring the conflict directly before the competent courts. The same is valid for applicants who did not receive any response or proper response from applied institutions. Appeal to the Council should be written, and suspends the time limit to refer to the administrative courts. The Council either rejects the appeal if he finds it unjustly or justifies the appeal and decides that access to the relevant information and document should be provided by the relevant institution. If the relevant authority does not comply with its decision the Council can bring the issue before the public prosecutor. There is not efficient official data to reach a proper conclusion whether the relevant public authorities respected the decisions of the Council. It can be suggested under the available data that some of decisions of the Council are respected, some are not.

b. Court review: The competent court for the review of decisions regarding the rejection of supplying information either by the applied institutions or by the Council are, at initial step, first instance administrative courts. The final appeal body is the Council of State (a supreme administrative court named *Danıştay*). That judicial review process for acts or omissions of public authorities is proceeded under the general rules of administrative law and the related regulations. The review process in administrative cases, in general, is proceeded as written examination based on case file, and oral hearings are exceptional. While the written phase of the case is carried out in closed sessions the oral hearings shall be open to the public unless there is reason derived from public morality or public security.

As regard to specific disputes concerning the right to information the public authorities are required to submit all the restricted- confidential information to the court. However access of the applicant-plaintiff to that information in the case file may be entirely or partially withheld by the court until the judgment is declared if it is necessary to protect the privacy of third parties.

15. Duty to make ınformation actively available

Public authorities are obliged to classify all information available and all information and documents which can be the subject of an application for information in a way that makes it easier to use. In that context institutions take the necessary administrative and technical measures for the recording, filing and archiving of documents. Institutional file plans detailing the information or documents, basic decisions and processes, projects and annual reports within the duty and service areas and which unit they are located at, and all relevant legal regulations as acts, by-laws, decisions of Council of Ministers and other regulatory bodies must be made publicly available. Institutions should restructure their internet web pages in accordance with those requirements as publishing the forms located in Annex 1 and Annex 2 of the BEHY on their official web sites to both facilitate to access to information efficiently and minimize the workload (BEHY, Art. 6/1-7 para.).

Apart from the above mentioned obligatory measures public authorities can also voluntarily provide certain information and documents related to the organizational structure, duties and services, decisions and decision making process of institution including reports with regard to budgets and spending, statistical data and other documents for public view through their internet web sites (BEHY, Art.7).

Concluding remarks

This report is prepared mainly taking into account the regulations with regard to the right to information in general due to very limited regulations, case law, and available official documents with regard to environmental information. Indeed available case law and official documents are limited for the right to information in general as well. The legislation in force concerning the right to information covers, in general, the basic terms and conditions to make sure to access to information. However the followings can be mentioned as major problem areas apart from the lack of direct legislation on the right to environmental information. First, particularly the lack of the framework laws with regard to the several exceptions to the right to information as state secrets, trade secrets and protection of personal data is indeed a very significant obstacle before promoting the right to information. Second, there is a compliance problem with the legal requirements by public authorities. Those authorities are tending not only to interpret the exceptions in a broad way but also to interpret the clearly specified requirements in a restrictive way to reject the demands for information. Some of those rejections have been overturned under the appeal process. However that cannot be considered as a permanent ensure since there is a lack of legal certainty based on the fact that there were legal data, and doubts with regard to the independency and partiality of the appeal bodies including courts. Besides, there is also a compliance problem with the court's judgments. It is ironic that it is not possible to reach the decisions of the appeal council including its previously published decisions through the official websites or other means. Finally the workload of public authorities on responding to the applications is increasing day by day, particularly as a consequence of the above mentioned obstacles.

Related regulations and official documents

- Türkiye Cumhuriyeti Anayasası 1982, Madde 74, 135(*Article 74 of the Constitution of the Republic of Turkey, 1982 as amended with the law No 5982 in 2010. English version is available in* https://global.tbmm.gov.tr/docs/constitution_en.pdf *).*
- BEHK: Bilgi Edinme Hakkı Kanunu 2003, 5432 sayılı kanun ile değişik *(The Right to Information Act as amended with the law No 5432 in 2005*)). http://www.bedk.gov.tr
- BEHY: (Bilgi Edinme Hakkı Kanununun Uygulanması Hakkında Yönetmelik, 27.4.2004 (*By-law on the Procedures and Basis for the Implementation of the Right to Information Act).* http://www.bedk.gov.tr
- Bilgi Edinme Değerlendirme Kurulunun Çalışma usul ve Esasları hakkında Yönetmelik *(By-law on the Working Procedures and Principles of the Council of Review of Access to Information).* http://www.bedk.gov.tr
- Bilgi ve Belgeye Erişim Ücreti Genel Tebliği, Resmi Gazete 14 February 2006 *(Circular on Tariff for Access to Information).*
- ÇK: Çevre Kanunu (*the Environment Act 1982 as last amended in 2006).* *http://www.mevzuat.gov.tr*
- Çevresel Etki Değerlendirmesi Yönetmeliği 2013 (*By-law on Environmental Impact Assessment)* *http://www.mevzuat.gov.tr*

▪ BEDK (Bilgi Edinme Değerlendirme Kurulu): Açıklamalı Bilgi Edinme Hakkı Kanunu, 2015 *(Council of Review of Access to Information, Explanatory Text on the Right to Information Act). http:// www.bedk.gov.tr*
▪ BEDK (Bilgi Edinme Değerlendirme Kurulu): Toplantı ve Kararlar, 07.06.2004-09.11.2005 *(Council of Review of Access to Information Board: Meetings and Decisions).* http://www.bilgiedinmehakki.org/doc/BEDK_kararlar.pdf (reached in 05.04.2015).
▪BEDK (Bilgi Edinme Değerlendirme Kurulu): 2013 Genel Raporu *(Council of Review of Access to Information Board: 2013 General Report)*. https://www.tbmm.gov.tr/bilgiedinme/2013_yili-degerlendirme _raporu.pdf
▪ TBMM (Türkiye Büyük Millet Meclisi): Onuncu Yıl, Çalıştay Raporu, 2013 (*Turkish Grand National Assembly: Tenth Year, Concluding Report of the Workshop on the Right to İnformation).* https://www.tbmm.gov.tr/bilgiedinme/bilgi_edinme_calistay_raporu.pdf (reached in 06.05.2015).

**The English version of BEHK and BEHY can be reached from the website of the BEDK. However those versions are not consolidated texts, and they do miss some sentences either. Other legislation and official documents are available only in Turkish.*