

Independent Reporting Mechanism

Action Plan Review: The
Netherlands 2023–2027

Open
Government
Partnership



Independent
Reporting
Mechanism

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Section I: Overview of the Netherlands 2023–2027 Action Plan

The Netherlands' fifth action plan focuses on government transparency. In particular, it includes promising efforts to improve government information management and transparency of the central government's procurement plans. The ambition of the plan could be improved by taking full advantage of the new four-year implementation period, and by including a greater focus on citizen participation and accountability. The co-creation process was driven by a newly formed coalition, which included active civil society engagement.

The Netherlands' fifth action plan is its first to span a four-year implementation period. Its 17 commitments are structured around seven categories, with many focusing on access to information. Influenced by the aftereffects of the 2021 childcare benefits scandal¹ and the recent introduction of the Dutch Open Government Act (Woo), some policy areas such as freedom of information, open source code, and open contracting were carried over from previous action plans. Other commitments offer a new focus on citizen information needs, open standards, and civil servants' work culture.

Two of the commitments introduce promising reforms. Commitment 5 draws on an existing government initiative to widen access to government information, including measures to improve archiving practices and build civil servants' capacities on information management. Commitment 13 would centralize the public's online access to procurement plans for goods and services regularly used by several ministries.

However, this action plan has a lower level of ambition than the previous one. Ten of the commitments have unclear potential for results. Furthermore, the plan does not take advantage of the potential benefits that come with a longer implementation timeframe. Over half of the commitments are planned for two years or less, and some include milestones that started before the action plan implementation period. As in previous plans, some of the commitments do not include concrete outputs. A number of commitments explore preliminary steps toward cultural and behavioral change. They focus on producing research or conducting training but fall short of outlining pathways towards broader reforms or mainstreaming new practices.

AT A GLANCE

Participating since 2011

Action plan under review: 2023–2027

IRM product: Action Plan Review

Number of commitments: 17

Overview of commitments:

Commitments with an open government lens: 17 (100%)

Commitments with substantial potential for results: 1 (6%)

Promising commitments: 2

Policy areas:

Carried over from previous action plans:

- Freedom of Information
- Open Contracting
- Open source code

Emerging in this action plan:

- Citizen Information Needs
- Civil servants' work culture

Compliance with OGP minimum requirements for co-creation: Yes

The Ministry of the Interior and Kingdom Relations (BZK) continued to oversee the co-creation process, while the Talking About Information Coalition took on the leadership role on the civil society side. The coalition was founded in November 2021 with the aim of eliminating information inequalities between the government and other stakeholders. Its membership spans the private sector, academia, civil society, and government, and is open to anyone interested in the coalition’s priorities.² It was formed in response to growing distrust between these sectors, particularly following the childcare benefits scandal. As a coalition founded independently of the Netherlands’ OGP process, its engagement reflected the efforts of actors beyond the OGP process to drive open government change. Given overlaps in membership,³ activities, and goals,⁴ the coalition merged with the Open Government Alliance (the previous OGP multistakeholder forum) in 2022.

Co-creation of the action plan kicked off in November 2022 with a manifesto produced by the coalition,⁵ who used the development of the fifth action plan as an opportunity to present the government with seven challenges and potential solutions.⁶ The BZK also elicited commitment proposals from government stakeholders that had led previous commitments, and some that were new to the process, such as those focused on inclusive digital government services. Using the manifesto as a framework, stakeholders jointly developed the commitment proposals.⁷ Three were excluded from the final action plan, as two government proposers backed out, and one civil society proposal was not adopted by the relevant government institution. The workload of the co-creation process was divided between government and civil society, resulting in the government handing some control over the action plan to the coalition. For certain commitments, implementation responsibility lies primarily with civil society, rather than government. The final action plan was developed as a direct response to the coalition’s manifesto and includes seven commitments proposed by civil society — four of which received financing from the BZK.⁸ One notable area from the manifesto that did not progress was algorithmic transparency.⁹

The BZK is considering revisions to the action plan, including the possibility of adding more commitments, as it hopes to take better advantage of the four-year time scale to achieve greater impact. Given that this is the Netherlands’ first four-year plan, the IRM supports revising the plan to raise its potential for results. This is permitted within one year of the action plan’s submission¹⁰ or during the action plan’s refresh period at its halfway point.¹¹ Existing commitments could include more ambitious milestones that cover the full four-year period. Those that focus on research and training for civil servants could adopt related reforms and consider how to institutionalize and mainstream new practices. Stakeholders could also consider adding new commitments to the action plan, such as those discussed during the co-creation process on algorithmic transparency, beneficial ownership, lobbying transparency, and whistleblower protection.

¹ Between 2004 and 2019, the tax office incorrectly accused over 50,000 parents of fraud and ordered them to pay back thousands of euros in childcare benefits. This scandal led to the government’s resignation in early 2021. See: “Childcare scandal compensation may cost €14 billion: NOS,” Dutch News, 14 May 2024, <https://www.dutchnews.nl/2024/05/childcare-scandal-compensation-may-cost-e14-billion-nos>.

² See <https://overinformatiegesproken.nl/bedrijven-wetenschap-en-maatschappelijke-organisaties-slaan-handen-ineen-in-maatschappelijke-coalitie-voor-een-betere-informatiesamenleving>; <https://overinformatiegesproken.nl/deelnemers-maatschappelijke-coalitie-over-informatie-gesproken>.

³ A list of the members of the coalition can be found at: <https://overinformatiegesproken.nl/deelnemers-maatschappelijke-coalitie-over-informatie-gesproken>; Members of the MSF as of January 2024 included Bart Volleberg (Transparency International), Serv Wiemers (Open State Foundation), Ruben Brave (Internet Society), a representative of Netwerk Democratie, Guido Enthoven (Talking about Information Coalition & IMI), Donovan Karamat Ali (Municipality of Utrecht), Henk Burgering/Marianne de Nooij (Province of South Holland), and Erna Ruijter (University of Utrecht).

⁴ Floortje Fontein (Ministry of the Interior and Kingdom Relations), correspondence with IRM researcher, 18 March 2024.

⁵ “Manifest maatschappelijke coalitie,” Over Informatie Gesproken, <https://overinformatiegesproken.nl/manifest-over-informatie-gesproken>.

⁶ “Manifest maatschappelijke coalitie,” Over Informatie Gesproken.

⁷ “Internal document No 3. Concept long list of commitments,” Ministry of the Interior and Kingdom Relations, <https://docs.google.com/document/d/1ZHWIRfMsx3znmfZlJwjMvW1NcJI2NS6s/edit>.

⁸ Floortje Fontein, (Ministry of the Interior and Kingdom Relations), interview by IRM researcher, 17 May 2024.

⁹ Floortje Fontein (Ministry of the Interior and Kingdom Relations), correspondence with IRM researcher, 16 January 2024.

¹⁰ “OGP National Handbook: Rules & Guidance for Participants v6,” Open Government Partnership, <https://www.opengovpartnership.org/documents/ogp-national-handbook-rules-and-guidance-for-participants-2022>.

¹¹ The refresh period is an opportunity for stakeholders to reflect on the implementation of a four-year action plan, assess next steps, and determine a way forward to ensure ambition and results.

Section II: Promising Commitments in the Netherlands 2023–2027 Action Plan

The following review looks at the two commitments that the IRM identified as having the potential to realize the most promising results. Promising commitments address a policy area that is important to stakeholders or the national context. They must be verifiable, have a relevant open government lens, and have modest or substantial potential for results. This review also provides an analysis of challenges, opportunities, and recommendations to contribute to the learning and implementation process of this action plan.

Table 1. Promising commitments

Promising Commitments
<p>Commitment 5: Multi-year plan for Public Access and Information Management of the Dutch Government: This commitment would use a 2021–2026 plan to widen access to government information, including measures to improve archiving practices and build civil servants’ capacities on information management.</p>
<p>Commitment 13: Open Procurement: This commitment would centralize public online access to plans of procuring goods and services regularly used by several ministries.</p>

Commitment 5: Multi-year plan for Public Access and Information Management of the Dutch Government (Ministry of the Interior and Kingdom Relations)

For a complete description of the commitment, see Commitment 5 of [the Netherlands 2023–2027 Action Plan](#).

Context and objectives

This commitment aims to improve government information management, archiving, and disclosure. It draws on a requirement in the recently introduced Open Government Act (*Wet open overheid* or “Woo”) that the Ministry of the Interior and Kingdom Relations (BZK) and the Ministry of Education, Culture, and Science will periodically submit a long-term plan to the parliament on how to improve the creation, organization, preservation, dissolution, and access of digital documents.¹

On 1 May 2022, Woo replaced the Public Access Act (*Wet openbaarheid van bestuur* or “Wob”), which introduced important changes to the Netherlands’ freedom of information (FOI) regime.² It requires active disclosure of information on the preparation, implementation, enforcement, and evaluation of public policy, previously often disclosed only on request. It provides a shorter response time to information requests and introduces a central platform where this information is made public (open-overheid.nl).³ Compared to Wob, Woo requests can be sent to a broader range of government entities, including the Senate, the House of Representatives, the Council of Justice, the state councilor, and the national ombudsperson—all of whom must designate a Woo contact person.

Previous Dutch action plans sought to disclose documents under Wob proactively.⁴ Under the current commitment, the 2021–2026 Multi-Year Plan for Public Access and Information Management (*Meerjarenplan Openbaarheid en Informatiehuishouding*) goes further by outlining how the government will ensure sustainable access to digital information under Woo. The

commitment also includes annual updates of the multi-year plan and reporting on progress in the Central Government Annual Report on Operational Management.

Potential for results: Substantial

The multi-year plan provides long-term and short-term solutions to address gaps in the government’s ability to manage information and meet transparency obligations under Woo. Although the plan states that the processing times for information requests have decreased since introduction of Woo,⁵ Freedom House notes that government agencies often miss deadlines in responding to requests.⁶ A study by the Institute for Social Innovation and the Open State Foundation found that since the introduction of Woo, processing times have increased from 161 to 167 days. This reflects continued difficulty for government entities to process requests within the required four weeks, including an additional two weeks for complex or large requests.⁷

Some of the underlying causes of long response times are inadequate ICT infrastructure and inefficient information archiving,⁸ including chat messages that can be subject to Woo requests. For instance, in 2023, only a limited number of the prime minister’s online chat messages were archived properly.⁹ This makes it important for the government to structure its archiving practices in messenger services and standardize what applications can be used by civil servants. The BZK has developed policies and guidelines on email, chat, and web archiving, which it will continue to develop and implement throughout the multi-year plan.

In addition, the multi-year plan envisages reducing the number of applications used across government entities to make filing and archiving more consistent. Five departments will pilot a tender to purchase and implement an appropriate Content Service Platform in the short term.¹⁰ If new and up-to-date ICT solutions are executed well, the workload and processing times of Woo requests could decrease significantly. Restructuring the government’s ICT infrastructure could help civil servants move from passively responding to requests to proactively publish information legally required by Woo. Proactively disclosing information could also reduce the volume of Woo requests since information might already be publicly available and effectively searchable.

The multi-year plan also includes capacity building measures. One of the generic measures mentioned in the plan is, for example, a learning center where government employees can participate in courses and training on information management. In this context, the plan will put into practice the new civil service oath of office to institutionalize an open and responsive government. In addition, it includes an activity to enhance community management and knowledge sharing.¹¹ This could help staff know where and what information is stored and what metadata is available.

Through this multi-year plan, the government aims to substantially increase the maturity level of the government’s information management. The BZK sees the change of cabinet as an opportunity to update the working culture and instructions on information management.¹² On the government’s 1 to 4 maturity level scale, there has already been some progress, moving from an average of 1.9 in 2021 to 2.3 in 2023.¹³ Ultimately, the goal is to reach a maturity level of 3 or 4. In part, the multi-year plan draws from the Netherlands’ long-term OGP platform, mentioning the OGP action plan as a priority for 2024 and 2025, including collaboration with civil society partners. This OGP commitment complements the multi-year plan to ensure that the plan substantially improves access to information in the Netherlands in practice.

Opportunities, challenges, and recommendations during implementation

The Multi-Year Plan for Public Disclosure and Information Management could bring important changes to information management and archiving practices in the Dutch administration.

Addressing challenges in the ICT infrastructure, processing times, and archiving practices (including chat messages, email, and web) is crucial to complying with Woo requirements. The IRM acknowledges that establishing a state of the art ICT infrastructure could potentially continue beyond the four-year OGP action plan and the multi-year plan. Funding for government organizations' efforts to improve information management and access to information is €787 million for 2021–2026, while another €627 million will be spent on linked activities after that period.¹⁴ This means the commitment will be financially sustainable during and beyond the action plan period.

The BZK could use the action plan's refresh period to take stock of the multi-year plan's progress and adjust this commitment's deliverables accordingly. Specifically, the IRM recommends the following steps during implementation:

- **Seek synergies with other commitments around Woo.** Several other commitments in this action plan contribute to implementing the Woo, including:
 - Commitment 3 which aims to promote the publication of Woo files according to findable, accessible, interoperable, and reusable (“FAIR”) principles to make searching for files and searching within files easier. It focuses on raising awareness of the principles among administrative bodies and supporting their implementation. The BZK could track compliance with the principles among administrative bodies through the multi-year plan implementation.
 - Commitments 9 and 10 which aim to assess the challenges experienced by Woo users and implementers as well as the processing times for Woo requests. BZK could use the Central Government Annual Report on Operational Management¹⁵ to inform future revisions and actions of the multi-year plan, and incorporate new milestones to implement measures from its reply¹⁶ to the implementation assessment of Woo.¹⁷
- **Collaborate with civil society to improve the handling of Woo requests and the archiving practices of public administration.** According to the multi-year plan and statements by the government, the response rate to Woo requests and effective archiving remain key challenges. The IRM recommends exploring collaboration with civil society partners to improve these practices. In other countries, civil society partners have developed portals to enhance the handling of FOI request, such as WhatDoTheyKnow in the UK, Queremos Saber in Brazil, and FragDenStaat in Germany. Building on the digital Woo-form pilot,¹⁸ integrating the existing tools used by civil society into open-overheid.nl could increase the outreach and statistics. For example, woo-knop.nl is a tool for users to make and search for FOI requests directly, and woo-generator.nl allows users to create FOI requests and then submit them as a letter or email.
- The training mentioned in the multi-year plan could help civil servants better understand the processes and duties. This entails collaboration with educational entities such as secondary and higher vocational education as well as academic institutions, including courses offered free of charge by the learning center.¹⁹ As the Guide to Professionalism in Civil Service addresses obligations to publish information, the IRM recommends **collaboration with the team working on Commitment 17 as well as a concrete exchange with professionals, such as the National Archives, on the best practices of archiving and needs for the transition of government information and documents.** The exchange could entail advice on adequate descriptive metadata or guidance on choosing the right data repository methods, which could then be added to the guide.

Commitment 13: Open Procurement (Ministry of the Interior and Kingdom Relations)

For a complete description of the commitment, see Commitment 13 of [the Netherlands 2023–2027 Action Plan](#).

Context and objectives

Building on the Dutch action plans' previous open procurement efforts,²⁰ this commitment aims to continue efforts to ease companies' and citizens' access to central authorities' procurement plans. By facilitating companies' ability to apply for tenders, these efforts aim to increase central authorities' chance of obtaining the best possible bid, therefore optimizing the use of taxpayer money. In addition, greater transparency can benefit oversight by government and civil society monitoring bodies. In 2024, the Court of Audit and Transparency International noted certain persistent deficiencies in government purchasing management. These included over EUR 108 million of unlawful tenders by the Ministry of Defense in 2023, extension of expired agreements due to planning issues, and approval of invoices without confirming the delivery of goods and/or services.²¹

In particular, the commitment focuses on Doing Business with the Government (*Rijksinkoop*), a public procurement platform launched in December 2022 under the fourth action plan²² which intends to expand the information available on the platform and build an app to improve accessibility. The platform currently focuses on procurement information related to so-called category management i.e., goods and services that several ministries regularly use, such as office supplies, company clothes, catering, etc. The annual purchasing volume of the central government was about EUR 16 billion in 2023, of which approximately EUR 4.5 billion concerned 22 categories. Procurement plans for 14 of those categories are already published on the platform, listing a schedule and specifications for procurement in each category of goods and services. The platform also publishes information on government policy regulating the social impact of procurement, and answers to companies' frequently asked questions. A separate platform, Tendernet, publishes the tenders themselves and information on bids won, while documents necessary to apply for a tender are on individual agency websites.²³

This commitment was proposed by BZK and developed with civil society during the co-creation process. Supporting stakeholders include the Open State Foundation, which has previously taken a lead in procurement-related commitments, and the Open Contracting Partnership (OCP). From the Open State Foundation's perspective, this commitment intersects with efforts to enhance the publication of government information in compliance with Woo.

Potential for results Modest

This commitment aims to make the remaining 8 of the 22 category plans available on Rijksinkoop in 2024.²⁴ Centralizing publication of all category plans would be a positive step towards making the public procurement portal a more comprehensive resource for companies that are interested in participating in central authorities' procurement processes. To prepare for further improvements to the quality of information on public procurement, the commitment also plans for dialogue with companies, universities, interest groups, and local governments,²⁵ as well as an OCP gap analysis. The analysis will assess the government's policy response to recommendations from an advisory report by Utrecht University Centre for Public Procurement that was released in an April 2022.²⁶

In 2024, the commitment also plans for the development of an open source app that could improve the navigation of published information on government procurement. The app will address one of five thematic areas: climate, circularity, social return, international social

conditions, or promoting innovation. A competition for developers to propose the app was opened from November 2023 to March 2024, offering a budget of EUR 25,000 to the winner.²⁷ The BZK anticipates that the app will use artificial intelligence to create a more efficient search engine to pull appropriate information for companies determining whether to participate in tenders. For instance, a company looking into a particular procurement rule could post a question within the app and receive an answer without having to sift through full documents.²⁸ This could address users' challenges when applying for procurement opportunities with central authorities, such as requisite knowledge of the Procuring with Impact Policy.²⁹ In Italy³⁰ and Indonesia,³¹ the OCP has documented examples where procurement apps have enhanced monitoring, transparency, or sustainability of procurement.

The commitment also includes a milestone to expand categories of procurement information available on the platform, although the scope is unclear. The BZK reports that having begun with a platform focused on central government departments' generic procurement (products and services all departments use, such as laptops), it is considering broadening the scope to include offices and specific procurement (products and services not used by every department, such as infrastructure projects or defense projects). However, the BZK does not have comprehensive jurisdiction over this.³² Likewise, although the milestone states the intention to begin including procurement by provinces and municipalities, the BZK does not have the authority to introduce new publication requirements for these authorities.³³ At this stage, the BZK reports its intention to engage in dialogue with local government officials and share best practices to encourage improvements to their tendering processes on a voluntary basis.³⁴

While addressing a promising area for reform, this commitment has modest potential for results. It would be a positive step to ensure that all central authorities' category plans are published in a central online location. The Open State Foundation notes that given the Netherlands' track record of publishing its public tenders online, there is a robust foundation for further development of public procurement transparency.³⁵ The commitment benefits from access to critical expertise from a range of stakeholders and a sufficient timeline to scale up the portal. However, achieving more ambitious outcomes would entail legislative reform requiring a broader range of procurement authorities, including in provinces and municipalities, to publish their information. Without new legislation, the commitment holders may not be able to address the current level of fragmentation beyond category plans. This means that small companies and civil society observers would likely continue struggling in navigating the bulk of procurement opportunities.³⁶

Opportunities, challenges, and recommendations during implementation

Scaling up and involving more authorities on the procurement platform requires training and robust infrastructure. As mentioned in the action plan, the involvement of various stakeholders can support the necessary steps to ensure this infrastructure is maintained. In this context, collaboration with OCP to ensure that strong data standards are being used in the publication of procurement data is a positive step. Widening the release of procurement data offers an opportunity for benchmarking, detecting corruption and malpractices, as well as government and civil society collaboration in performance and pricing evaluation. Making data understandable and reusable can engage new vendors and make procurements more competitive.

To support this commitment's objectives during implementation, the IRM recommends to:

- **Improve collection of category management procurement data** by addressing gaps in contract related data like values, milestones and amendments, as well as subcontractor information, supplier ID, and beneficial ownership. Transparency would also benefit from

centralizing contract phase-related data, incorporating a specific tag in centralized procurement datasets for category management processes, and ensuring that URLs for publishing procurement documents do not expire.

- **Centralize publication of information on wider procurement processes**, including for provinces, municipalities, and low-value procurement. This can combine data about the entire contracting cycle (beyond the tender and award stages) from databases like TenderNed, private procurement platforms, the national procurement calendar, and others. This can ensure interoperability across different procurement authorities and establish clear authority for a government agency to oversee wider access to procurement information. Centralization can start with research on user needs, and can incorporate mechanisms for consultation and independent monitoring. A roadmap could be developed to identify where legislative reform may be needed. If legislative reform is not possible, consider training for wider procurement authorities to encourage voluntary centralization of procurement information.
- **Offer training to diverse civil society actors, businesses, and journalists on navigating public procurement practices and data, as well as the Procuring with Impact Policy.** This can enable a wide range of users to identify red flags and integrity risks across the procurement cycle. In addition, ensure that the winning app is sustainably used and include an evaluation process that allows users to provide feedback on the app and for developers to incorporate the feedback.
- **Involve civil society in the development and evaluation of the dialogue function.** This could include a feedback and complaints mechanism to flag irregularities in the procurement procedure, especially during the implementation phase. It could also include a question function for citizens to contact the purchasing authority. It can also offer a systematic channel for public requests to fill gaps in available procurement information.

Other commitments

Other commitments the IRM did not identify as promising are discussed below. This review provides recommendations to contribute to the learning and implementation of these commitments.

Several commitments plan to publish reports on open government issues, but do not include milestones to translate research findings into real-world reforms. These include reports on how citizens gain control over their data (Commitment 1), information asymmetry between the government and citizens or businesses during administrative court proceedings (Commitment 6), implementation of the Open Government Act (Commitment 9), citizens' information needs (Commitment 14), and the societal benefits of government transparency (Commitment 15). Commitment 4 aims to continue the publication of an existing annual report measuring the use of open standards, along with an awareness-raising event. Commitment 10 plans to incorporate information on handling of information requests to the existing Central Government Annual Report on Operational Management. To improve each of these commitments' potential for results, stakeholders could consider adding milestones to support uptake of the reports' findings, such as through relevant reforms or citizen oversight initiatives. For example, during the beginning of the implementation period, the report on implementation of Woo was published,³⁷ and BZK's reply included measures to improve execution of the Woo³⁸ – measures which Commitments 9 and 14 could adopt as new milestones. Likewise, Commitment 6 could incorporate new milestones concretizing policy developments on administrative court proceedings, under the supervision of the Ministry of Justice and Security.

Commitment 2 plans for a Public Access Center in Amsterdam to facilitate citizens in making information requests both digitally and in person. It could be valuable to explore this potentially inclusive pathway to providing freedom of information offline. However, the commitment does not include plans to replicate this practice.³⁹ To broaden its potential impact, the IRM recommends treating the Public Access Center in Amsterdam as a pilot, and laying out a pathway to expand to other municipalities.

Commitment 3 aims to support the publication of Woo files in line with the findable, accessible, interoperable, and reusable (FAIR) principles. Its milestones aim to raise awareness and hold an awards ceremony on good practices. Early implementation has focused on continuing to expand WooGLE⁴⁰ and software related to Woo metadata, decision letters, and anonymization.⁴¹ To raise its potential for results, implementers could set ambitious numeric targets on raising the number of FAIR publications of Woo files and consider whether oversight measures are needed to achieve these targets.

Under Commitment 7, ProDemos, which operates a parliament visitor center in the Hague, plans to widen its civic participation trainings, particularly for youth. To increase the commitment's ambition, additional milestones could offer new opportunities for citizens to participate in or monitor parliamentary decision-making.

Supported by the ICTU Foundation, the Ministry of the Interior and Kingdom Relations plans to use Commitment 8 to deploy a tool for deliberation, focused on collecting and analyzing what large groups of people think using advanced statistics and machine learning. This is based on a commitment of the Work Agenda on Value-Driven Digitalisation (*Werkagenda Waardengedreven Digitaliseren*).⁴² The tool will be linked to polis.overheid.nl, a platform that was tested in Groningen and Amsterdam under the previous action plan. During early implementation, development of the tool had begun.⁴³ Previously, citizen engagement has often been limited to surveys, forums, and social media, so the new tool could make this process more effective. However, neither the OGP commitment nor work agenda include many details on implementation of the tool. The IRM suggests collaborating with relevant civil society organizations to provide feedback throughout the tools' development process, and adding milestones that set ambitious targets on the tool's practical use in widening the reach of public consultations. The IRM also recommends developing guidelines for digital citizen participation that can widen uptake of the tool and change government bodies' approach to inclusive and participatory policymaking.

Commitment 11 focuses on supporting government stakeholders to publish high-value datasets. This commitment responds to the EU Open Data Directive⁴⁴ and builds on previous OGP commitments on open data.⁴⁵ Wide publication of these datasets could be economically beneficial. For instance, mobility data can contribute to new business ideas in logistics and transportation, or innovations in sustainable public transit. However, the commitment does not set targets on the scope of datasets to be released, although the commitment lead reports the plan to set goals beyond 2024.⁴⁶ Ambitious and concrete targets that take advantage of the action plan's four-year timeframe could raise this commitment's potential for results. To complement recent updates to the Manual for the Reuse of Government Information Act, the IRM also suggests collaborating with the data protection office to help answer data protection questions through training.

Commitment 12 aims to establish an Open Source Program Office (OSPO) within the BZK as proposed by the 2020–2023 EU Open Source Software Strategy⁴⁷ and building on the recommendations of a BZK report under the previous action plan.⁴⁸ Some other governmental departments, such as the Tax Administration as well as the Ministry of Health, Welfare and Sport,

have already introduced similar offices. However, a centralized office for the ministry coordinating open source efforts could contribute to mainstreaming open source software throughout government departments and guiding their publication of open source code. As of December 2023, the BZK had formally established the OSPO and was creating an overview of open source software within government and establishing a governance structure for the office.⁴⁹ However, the commitment does not provide a concrete scope for the OSPO’s planned actions during the implementation period. Successful implementation could be measured by the number of open source software publications by government and the number of members who join the open-source community portal (opensource.pleio.nl).⁵⁰ The IRM recommends clarifying targets for the OSPO during the commitment’s implementation period, and defining the roles and responsibilities of the OSPO.⁵¹ The IRM also recommends collaborating with the stakeholders that worked on algorithmic transparency during the previous plan, and joining international OSPO networks, such as the OSPO Alliance or OSPO++, which can provide important support.

The action plan’s final two commitments focus on guides for civil servants. Led by the Ministry of Infrastructure and Water, Commitment 16 aims to publish an updated knowledge agenda⁵² with recommendations on improving civic participation in areas such as housing, spatial planning, and environmental and climate policies, along with an online participation guide – although implementers are planning to update the commitment.⁵³ Commitment 17 plans to disseminate guides on professionalism in the civil service through a series of workshops. Prior to the implementation period, the BZK produced the Guide to Professionalism in the Civil Service (Gids AV)⁵⁴ and the Guidance for Dilemma Discussions on Transparency.⁵⁵ At the core of this commitment lies the theory that good decisions in crucial moments stem from the individual’s internalization and understanding of the decisions they should make.⁵⁶ Exchanges during workshops and further research will be used to further develop a moral jurisprudence on the work ethics of the Dutch administration. To raise these commitments’ potential for results, the IRM recommends using the remaining two years of the implementation period to take binding steps to mainstream participation and ethics considerations in civil servants’ work. For instance, implementers could consider relevant regulations, oversight measures, or assignment of government contact points.

¹ “The Netherlands Open Government Action Plan 2020–2022,” Ministry of the Interior and Kingdom, <https://www.opengovpartnership.org/documents/netherlands-action-plan-2020-2022>.

² See <https://www.debrauw.com/articles/netherlands-introduces-new-access-to-public-information-regime>.

³ “Woo regelt recht op overheidsinformatie,” Rijksoverheid, 2022, <https://www.rijksoverheid.nl/actueel/nieuws/2022/05/01/woo-regelt-recht-op-overheidsinformatie>.

⁴ “The Netherlands Open Government Action Plan 2020–2022,” Ministry of the Interior and Kingdom.

⁵ “Merjarenplan Openbaarheid en Informatie Huishouding,” Rijksoverheid, 2023, <https://open.overheid.nl/documenten/4d2a2d10-4443-4521-971b-4fcfcfb792/file>.

⁶ “Freedom in the World 2023 Netherlands,” Freedom House, 2023, <https://freedomhouse.org/country/netherlands/freedom-world/2023>.

⁷ “Matglas,” Open State Foundation & Institute for Social Innovation, March 2023, <https://openstate.eu/wp-content/uploads/sites/14/2023/03/Rapport-Matglas-OSF-IMI-9-03-2023-digitaal.pdf>.

⁸ “Research into the Open Government Act shows: a lot of action, but little results,” Open State Foundation & Institute for Social Innovation, March 2023, <https://openstate.eu/nl/2023/03/onderzoek-naar-wet-open-overheid-wijst-uit-veel-actie-maar-weinig-resultaat>.

⁹ “Freedom in the World 2023 Netherlands,” Freedom House.

¹⁰ “Merjarenplan Openbaarheid en Informatie Huishouding,” Rijksoverheid.

¹¹ “Merjarenplan Openbaarheid en Informatie Huishouding,” Rijksoverheid.

¹² “Merjarenplan Openbaarheid en Informatie Huishouding,” Rijksoverheid.

¹³ “Meting Informatiehuishouding 2022,” Rijksoverheid, 2022, <https://www.open-overheid.nl/instrumenten-en-diensten/publicaties/2023/01/06/meting-informatiehuishouding-2022>; “Analyse jaarrapportages en

volwassenheidsmetingen informatiehuishouding 2023,” Rijksoverheid, 2024, <https://www.open-overheid.nl/onderwerpen/meten-en-verbeteren/instrumenten-en-diensten/evaluaties/2024/3/4/analyse-jaarrapportages-en-volwassenheidsmetingen-informatiehuishouding-2023>. The maturity levels growth model is divided into four levels, with level 1 categorized as ad hoc, level 2 as repeatable, level 3 as defined, and level 4 as managed.

¹⁴ “Merjarenplan Openbaarheid en Informatie Huishouding,” Rijksoverheid.

¹⁵ “Jaarrapportage Bedrijfsvoering Rijk 2023” [Annual Report on Government Operations 2023], Rijksoverheid, 15 May 2024, <https://www.rijksoverheid.nl/documenten/jaarverslagen/2024/05/15/jaarrapportage-bedrijfsvoering-rijk-2023>.

¹⁶ “Kamerbrief met kabinetsreactie op invoeringstoets Wet open overheid (Woo)” [Letter to Parliament with Cabinet’s Response to the Implementation Assessment of the Open Government Act (Woo)], Rijksoverheid, 21 June 2024, <https://www.rijksoverheid.nl/documenten/kamerstukken/2024/06/21/kamerbrief-tk-kabinetsreactie-invoeringstoets-wet-open-overheid-woo>.

¹⁷ “Woo-invoeringstoets” [Implementation Assessment of Woo], Rijksoverheid, 7 December 2023, <https://www.rijksoverheid.nl/documenten/rapporten/2023/12/07/woo-invoeringstoets>.

¹⁸ “Pilot digitaal Woo-formulier BZK,” Rijksoverheid, 2024, <https://www.open-overheid.nl/actueel/nieuws/2024/6/24/pilot-digitaal-woo-formulier-bzk>.

¹⁹ “Merjarenplan Openbaarheid en Informatie Huishouding,” Rijksoverheid.

²⁰ “The Netherlands Open Government Action Plan 2013–2015,” Ministry of the Interior and Kingdom Relations, <https://www.opengovpartnership.org/wp-content/uploads/2019/06/Netherlands-Action-Plan-Open-Government-Partnership.pdf>; “The Netherlands Open Government Action Plan 2016–2018,” Ministry of the Interior and Kingdom Relations, https://www.opengovpartnership.org/wp-content/uploads/2017/05/LR_91332_Actieplan_ENG_v2_0.pdf; “The Netherlands Action Plan for Open Government 2018–2020,” Ministry of the Interior and Kingdom Relations, https://www.opengovpartnership.org/wp-content/uploads/2018/11/Netherlands_Action-Plan_2018-2020_EN.pdf.

²¹ Sjoerd Eppinga, “Aanbestedingswet té vaak niet goed toegepast door het Rijk,” [Procurement law is too often not properly applied by the government], Transparency International Nederland, 28 May 2024, <https://www.transparency.nl/nieuws/2024/05/aanbestedingswetgeving-te-vaak-niet-goed-toegepast-door-het-rijk>.

²² “The Netherlands Open Government Action Plan 2020–2022,” Ministry of the Interior and Kingdom Relations, https://www.opengovpartnership.org/wp-content/uploads/2021/01/Netherlands_Action-Plan_2020-2022.pdf.

²³ Peter Specker (Ministry of the Interior and Kingdom Relations), correspondence with IRM researcher, 21 May 2024; Peter Specker (Ministry of the Interior and Kingdom Relations), interview by IRM researcher, 28 May 2024.

²⁴ An overview of the categories and category plans can be found at:

<https://www.rijksoverheid.nl/onderwerpen/zakendoen-met-het-rijk/inkoopcategorien>.

²⁵ Specker, correspondence; Specker, interview.

²⁶ “Open public procurement data by default,” Utrecht University, 7 April 2022, <https://www.rijksoverheid.nl/binaries/rijksoverheid/documenten/rapporten/2022/04/07/aanbevelingen-aan-het-rijk-voor-openbaar-maken-van-data-over-publieke-inkoop/Recommendations+for+making+different+types+of+public+procurement+data+available.pdf>; Karolis Granickas (Open Contracting Partnership), interview by IRM researcher, 22 May 2024.

²⁷ “Kick-Off Open Inkoopdata App Challenge presentation,” Open State Foundation, December 2023, <https://openstate.eu/wp-content/uploads/sites/14/2023/12/Kick-off-App-Challenge-Presentatie.pdf>.

²⁸ Specker, correspondence; Specker, interview.

²⁹ “Inkopen met impact,” Rijksoverheid, 28 October 2019, <https://www.rijksoverheid.nl/documenten/rapporten/2019/10/28/inkopen-met-impact>.

³⁰ “AppaltiPOP: Accountability for Italy’s public contracts,” Open Contracting Partnership, 8 December 2020, <https://www.open-contracting.org/2020/12/08/appaltipop-accountability-for-italys-public-contracts>.

³¹ “Making participation and use of open contracting data sustainable: Lessons from Bandung, Indonesia,” Open Contracting Partnership, 8 April 2020, <https://www.open-contracting.org/2020/04/08/making-participation-and-use-of-open-contracting-data-sustainable-lessons-from-bandung-indonesia>.

³² Specker, correspondence; Specker, interview.

³³ Granickas, interview.

³⁴ Specker, correspondence; Specker, interview.

³⁵ Serv Wiemers (Open State Foundation), interview by IRM researcher, 14 January 2024.

³⁶ Granickas, interview.

³⁷ “Woo-invoeringstoets,” Rijksoverheid, 2023, <https://www.rijksoverheid.nl/documenten/rapporten/2023/12/07/woo-invoeringstoets>.

³⁸ “Kamerbrief met kabinetsreactie op invoeringstoets Wet open overheid (Woo),” Rijksoverheid, 2024, <https://www.rijksoverheid.nl/documenten/kamerstukken/2024/06/21/kamerbrief-tk-kabinetsreactie-invoeringstoets-wet-open-overheid-woo>.

³⁹ Wiemers, interview.

⁴⁰ “WooGLE,” <https://woogle.wooverheid.nl/overview> (accessed 21 August 2024).

- ⁴¹ Maartenmarx, “Woo besluit anoniem by design” [Woo decisions anonymous by design], wooverheid, 23 March 2024, <https://wooverheid.nl/2024/03/23/woo-besluit-anoniem-by-design/>.
- ⁴² “Werkagenda Waardengedreven Digitaliseren,” Digitale Overheid, 2022, <https://www.tweedekamer.nl/downloads/document?id=2022D45421>.
- ⁴³ “Praat mee met de overheid” [Participate in discussions with the government], 2024, <https://praatmeemetdeoverheid.nl/home>.
- ⁴⁴ “Directive (EU) 2019/1024 of the European Parliament and of the Council of 20 June 2019 on open data and the re-use of public sector information (recast),” Council of the European Union, 20 June 2019, <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:32019L1024>.
- ⁴⁵ “The Netherlands Open Government Action Plan 2020–2022,” Ministry of the Interior and Kingdom Relations.
- ⁴⁶ Jasper Kars (Rijksoverheid), interview by IRM researcher, 19 January 2024.
- ⁴⁷ “Open Source Software Strategy 2020–2023,” European Commission, October 2020, https://commission.europa.eu/system/files/2020-10/en_ec_open_source_strategy_2020-2023.pdf.
- ⁴⁸ “Opensourcowerken report,” Ministry of the Interior and Kingdom Relations, 13 September 2022, <https://open.overheid.nl/documenten/ronl-11418083f5e2244a462069137d519ef852237b3f/pdf>.
- ⁴⁹ Boris Hoytema (Ministry of the Interior and Kingdom Relations), interview by IRM researcher, 19 December 2023.
- ⁵⁰ See an overview of the open source efforts in the Netherlands by the EU Open Source Observatory (OSOR) at: <https://joinup.ec.europa.eu/collection/open-source-observatory-osor/news/open-source-toolbox-released-netherlands>.
- ⁵¹ The EU Open Source Observatory published an overview of the specificities of OSPOs in the public and private sectors at: <https://joinup.ec.europa.eu/collection/open-source-observatory-osor/news/specificities-public-sector-ospos>.
- ⁵² “Knowledge Hub for Participation,” Kennisknooppunt Participatie, <https://www.kennisknooppuntparticipatie.nl/publicaties/onderzoekpublicaties/default.aspx>.
- ⁵³ Ruben Bastiaanse (Ministry of the Interior and Kingdom Relations), information shared with the IRM during the pre-publication period, 1 August 2024.
- ⁵⁴ “De Gids Ambtelijk Vakmanschap,” Rijksoverheid, <https://www.grenzeloossamenwerken.nl/ambtelijk-vakmanschap/gids-ambtelijk-vakmanschap>.
- ⁵⁵ “Handreiking Dilemma gesprekken,” Open Overheid, https://www.communicatierijk.nl/binaries/communicatierijk/documenten/publicaties/2023/04/26/handreiking-dilemmagesprekken/BZK_Handreiking_dilemmagesprek_FIN.pdf.
- ⁵⁶ Susanne Oudenhoven (Ministry of the Interior and Kingdom Relations), interview by IRM researcher, 26 January 2024.

Section III. Methodology and IRM Indicators

This product is a concise, independent, technical review of the characteristics of the action plan and the strengths and challenges the IRM identifies to inform a stronger implementation process. The IRM highlights commitments that have the highest potential for results, a high priority for country stakeholders, a priority in the national open government context, or a combination of these factors.

The IRM products provided during a national action plan cycle include:

- **Co-Creation Brief:** A concise brief that highlights lessons from previous IRM reports to support a country's OGP process, action plan design, and overall learning.
- **Action Plan Review:** A technical review of the characteristics of the action plan and the strengths and challenges IRM identifies to inform a stronger implementation process.
- **Midpoint Review:** A review for four-year action plans after a refresh at the midpoint. The review assesses new or significantly amended commitments in the refreshed action plan, compliance with OGP rules, and an informal update on implementation progress.
- **Results Report:** An overall implementation assessment that focuses on policy-level results and how changes happen. It also checks compliance with OGP rules and informs accountability and longer-term learning.

In the Action Plan Review, the IRM reviews commitments using three indicators:

1. Verifiability: The IRM determines whether a commitment is verifiable as written in the action plan. The indicator is assessed as:

- **Yes/No:** Are the stated objectives and proposed actions sufficiently clear and include objectively verifiable activities to assess implementation?
- Commitments that are not verifiable are considered not reviewable, and no further assessment is carried out.

2. Open Government Lens: The IRM determines if the commitment relates to the open government values of transparency, civic participation, or public accountability as defined by the Open Government Declaration and the OGP Articles of Governance. Based on a close reading of the commitment text, the indicator is assessed as:

- **Yes/No:** Does the commitment set out to make a policy area, institution, or decision-making process more transparent, participatory, or accountable to the public?

The following questions for each OGP value may be used as a reference to identify the specific open government lens in commitment analysis:

- **Transparency:** Will the government disclose more information, improve the legal or institutional frameworks to guarantee the right to information, improve the quality of the information disclosed to the public, or improve the transparency of government decision-making processes or institutions?
- **Civic Participation:** Will the government create or improve opportunities, processes, or mechanisms for the public to inform, influence or co-create policies, laws and/or decisions? Will the government create, enable, or improve participatory mechanisms for minorities, marginalized or underrepresented groups? Will the government improve the enabling environment for civil society (which may include NGO laws, funding mechanisms, taxation, reporting requirements, etc.)? Will the government improve legal, policy,

institutional or practical conditions related to civic space such as freedom of expression, association and peaceful assembly that would facilitate participation in the public sphere? Will the government take measures which counter mis- and disinformation, especially online, to ensure people have access to reliable and factual information (which may include digital and media literacy campaigns, fact-checking or fostering an independent news media ecosystem)?

- **Public Accountability:** Will the government create or improve opportunities to hold officials answerable for their actions? Will the government enable legal, policy, or institutional frameworks to foster accountability of public officials?

3. Potential for Results: The IRM analyzes the expected results and potential that would be verified in the IRM Results Report after implementation. Potential for results is an early indication of the commitment’s possibility to yield meaningful results based on its articulation in the action plan in contrast with the state of play in the respective policy area. The indicator is assessed as:

- **Unclear:** The commitment is aimed at continuing ongoing practices in line with existing legislation, requirements, or policies without indication of the added value or enhanced open government approach in contrast with existing practice.
- **Modest:** A positive but standalone initiative or change to processes, practices, or policies. The commitment does not generate binding or institutionalized changes across government or institutions that govern a policy area. Examples are tools (e.g., websites) or data release, training, or pilot projects.
- **Substantial:** A possible game changer for practices, policies, or institutions that govern a policy area, public sector, or the relationship between citizens and state. The commitment generates binding and institutionalized changes across government.

This review focuses its analysis on promising commitments. Promising commitments are verifiable, have an open government lens, and at least a modest potential for results. Promising commitments may also be a priority for national stakeholders or for the particular context. The IRM may cluster commitments with a common policy objective or that contribute to the same reform or policy issue. The potential for results of clustered commitments is reviewed as a whole.

During the internal review process of this product, the IRM verifies the accuracy of findings and collects further input through peer review, OGP Support Unit feedback as needed, interviews and validation with country stakeholders, an external expert review, and oversight by IRM’s International Experts Panel (IEP).¹

This review was prepared by the IRM in collaboration with Mara Mendes and was externally expert reviewed by Andy McDevitt. The IRM methodology, quality of IRM products, and review process are overseen by IRM’s IEP. For more information, see the IRM Overview section of the OGP website.²

¹ Independent Reporting Mechanism, “International Experts Panel,” Open Government Partnership, <https://www.opengovpartnership.org/about/who-we-are/international-experts-panel>.

² Independent Reporting Mechanism, “Overview,” Open Government Partnership, <https://www.opengovpartnership.org/irm-guidance-overview>.

Annex 1. Commitment by Commitment Data

<p>Commitment 1: Control of own data</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Unclear
<p>Commitment 2: Public Access Center Amsterdam</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest
<p>Commitment 3: FAIR Woo files</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest
<p>Commitment 4: Open standards</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Unclear
<p>Commitment 5: Multi-year plan for Public Access and Information Management of the Dutch Government</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Substantial
<p>Commitment 6: Information position of citizens and businesses in administrative proceedings</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Unclear
<p>Commitment 7: Open Parliament</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Unclear
<p>Commitment 8: Strengthening citizen participation with digital tools</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest

<p>Commitment 9: Implementation assessment of the Open Government Act</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Unclear
<p>Commitment 10: Central Government Annual Report on Operational Management</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Unclear
<p>Commitment 11: Open data</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest
<p>Commitment 12: Open Source Program Office</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest
<p>Commitment 13: Open procurement</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest
<p>Commitment 14: Research on information needs and protocols</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Unclear
<p>Commitment 15: Societal benefits of transparency</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Unclear
<p>Commitment 16: Professionalization of participation</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Unclear
<p>Commitment 17: Guide to professionalism in civil service</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Unclear

Annex 2: Action Plan Co-Creation

OGP member countries are encouraged to aim for the full ambition of the updated OGP Participation and Co-Creation Standards that came into force on 1 January 2022.¹ IRM assesses all countries that submitted action plans from 2022 onward under the updated standards. OGP instituted a 24-month grace period to ensure a fair and transparent transition to the updated standards. During this time, IRM will assess countries' alignment with the standards and compliance with their minimum requirements.² However, countries will only be found to be acting contrary to the OGP process if they do not meet the minimum requirements, starting with action plans submitted to begin in 2024 and onward. Table 2 outlines the extent to which countries' participation and co-creation practices meet the minimum requirements that apply during the development of the action plan.

Table 2. Compliance with minimum requirements

Minimum requirement	Met during co-creation?	Met during implementation ?
1.1 Space for dialogue: The Talking about Information Coalition was the primary space for multistakeholder participation in the OGP process during development of the action plan. It also functions beyond the OGP process, and includes participants from government, the private sector, the scientific community, and civil society. During the co-creation process, it met monthly ³ and held meetings with the Ministry of the Interior and Kingdom Relations (the Netherlands OGP point of contact). The coalition published the meeting agendas and lists of attendees on its website. ⁴ The Open Government Alliance, the Netherlands' previous OGP multistakeholder forum, has overlapping membership ⁵ and also met quarterly during the co-creation process. The alliance and coalition merged in 2022.	Yes	<i>To be assessed in the Results Report</i>
2.1 OGP website: The website open-overheid.nl contains information on the last action plan and an overview of activities, news, and engagement opportunities. The website was relaunched in mid-2023, so some of the prior information is not available. However, information on the action plans dates back to 2022.	Yes	<i>To be assessed in the Results Report</i>
2.2 Repository: The repository can be accessed at open-overheid.nl . It is updated with information on the action plan more than twice a year. The updates are numbered, making it easy to follow the process. Little information was published on the co-creation process. ⁶	Yes	<i>To be assessed in the Results Report</i>
3.1 Advanced notice: A brief co-creation timeline was published in September 2022, ⁷ two months prior to the beginning of the co-creation process in November 2022. However, the website did not publish a structured calendar, which could have helped to provide a more comprehensive overview of the activities.	Yes	Not applicable

3.2 Outreach: During the co-creation process, BZK ran a bi-weekly event called <i>Open Thursdays</i> at the National Archives with talks on OGP topics and the opportunity to network afterwards. ⁸	Yes	Not applicable
3.3 Feedback mechanism: In 2022, the Talking about Information Coalition presented the government with a manifesto ⁹ which became the foundation for the action plan. After that, there were regular meetings between the coalition and the MSF to discuss the manifesto and action plan. There were no official mechanisms for feedback from the wider public, but the process was open to the participating stakeholders and the government point of contact ensured that all stakeholders, including those involved in previous action plans, were able to contribute.	Yes	Not applicable
4.1 Reasoned response: The Talking about Information Coalition’s manifesto of proposed commitments was published on their website. ¹⁰ Later in the process, a full list of commitments proposed by government and civil society was compiled as an internal government document. ¹¹ For civil society proposals not included in the action plan, the Ministry of the Interior and Kingdom Relations provided reasoned response at meetings with the coalition. ¹²	Yes	Not applicable
5.1 Open implementation: The IRM will assess whether meetings were held with civil society stakeholders to present implementation results and enable civil society to provide comments in the Results Report.	Not applicable	<i>To be assessed in the Results Report</i>

¹ “2021 OGP Participation and Co-Creation Standards,” Open Government Partnership, <https://www.opengovpartnership.org/ogp-participation-co-creation-standards>.

² “IRM Guidelines for the Assessment of Minimum Requirements,” Open Government Partnership, <https://www.opengovpartnership.org/documents/irm-guidelines-for-the-assessment-of-minimum-requirements>.

³ Serv Wiemers (Open State Foundation), interview by IRM researcher, 14 January 2024.

⁴ See <https://www.overinformatiegesproken.nl>.

⁵ A list of the members of the coalition can be found at <https://overinformatiegesproken.nl/deelnemers-maatschappelijke-coalitie-over-informatie-gesproken>; members of the MSF as of January 2024 included Bart Volleberg (Transparency International), Serv Wiemers (Open State Foundation), Ruben Brave (Internet Society), a representative from Netwerk Democratie, Guido Enthoven (Talking about Information Coalition & IMI), Donovan Karamat Ali (Municipality of Utrecht), Henk Burgering/Marianne de Nooij (Province of South Holland), and Erna Ruijter (Utrecht University).

⁶ See <https://www.open-overheid.nl/over-open-overheid/actieplan-open-overheid>; <https://www.open-overheid.nl/actueel/nieuws>.

⁷ See <https://www.open-overheid.nl/actueel/nieuws/2022/09/14/nieuwe-actieplanpagina>.

⁸ Open Thursdays are held every week with even numbers. More information can be found on the Dutch Open Government Website at <https://www.open-overheid.nl/actueel/activiteiten/2024/3/7/open-donderdag-architectuurschets-duurzaam-toegankelijke-overheidsinformatie>.

⁹ “Over Informatie Gesproken, Manifest maatschappelijke coalitie,” Over Informatie Gesproken <https://overinformatiegesproken.nl/manifest-maatschappelijke-coalitie-over-informatie-gesproken>.

¹⁰ See <https://www.overinformatiegesproken.nl/oig-manifest>.

¹¹ See <https://docs.google.com/document/d/1rS8Ukos8Hlka2gK2voCcp8SU0FODd1fl/edit#heading=h.gjdqxs>.

¹² Floortje Fontein (Ministry of the Interior and Kingdom Relations), interview by IRM researcher, 17 May 2024.