

# Independent Reporting Mechanism

Action Plan Review:  
Republic of Korea  
2023-2027

Open  
Government  
Partnership



Independent  
Reporting  
Mechanism

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

*The action plan includes promising commitments on administrative appeals, access to government data, and whistleblower protection—but its other commitments do not have clear potential for open government results. Given that this is the Republic of Korea’s first four-year plan, the government could consider revising the action plan to strengthen the commitments’ ambition and relevance to open government.*

This report offers a review of the design of the Republic of Korea’s sixth OGP action plan, which has a four-year implementation period. The action plan includes 10 commitments intended to target anti-corruption, digital, and civic participation. It introduces a new focus on social inclusion with Commitments 5, 7, 8, 9, and 10, but most of these initiatives have weak relevance to open government values. As a result, only 30% of commitments have clear potential for results (compared to 71% in the previous action plan).

Co-creation was led by the Open Government Committee (OGC), the country’s multistakeholder forum (MSF), which was co-chaired by the Vice Minister of Interior and Safety and Transparency International – Korea. OGC expanded to include academic and private sector representatives, but civil society representatives constituted a smaller portion of the committee than the previous co-creation process. Following development of the action plan, in February 2024, OGC contracted to largely government, academic, and private sector representatives – with only one civil society representative.<sup>1</sup> The process for developing the action plan did not meet one of the minimum requirements of the OGP Participation & Co-Creation Standards, as OGC did not provide stakeholders with sufficient reasoned response to their contributions during co-creation. OGP instituted a 24-month grace period to ensure a fair and transparent transition to the updated standards, extending to 31 December 2023. As this action plan was co-created and submitted on 31 August 2023, it falls within the grace period.

This action plan was developed over a longer period than the previous plan, through an almost year-long consultative process. Several stakeholders noted that this offered more opportunity for civil society input.<sup>2</sup> Over a month-long contest, the government received 51 proposals from the public, as well as 37 government proposals. OGC narrowed these to 49 potential commitments it considered relevant to open government values.<sup>3</sup> OGC’s four Subcommittees on Planning, Anti-

### AT A GLANCE

**Participating since:** 2011

**Number of commitments:** 10

#### Overview of commitments:

Commitments with an open government lens: 8 (80%)

Commitments with substantial potential for results: 2 (20%)

Promising commitments: 3

#### Policy areas:

Carried over from previous action plans:

- Whistleblower protection
- Open data
- Civic tech
- Digital inclusion

Emerging in this action plan:

- Administrative appeals
- Hate speech
- Social inclusion

**Compliance with OGP minimum requirements for co-creation:** No

Corruption, Digital, and Civic Participation each considered these proposals through four rounds of discussion, eventually developing 22 draft commitments. Most meetings were not attended by the wider public or government agencies beyond the Ministry of the Interior and Safety (MOIS), although relevant agencies joined the fourth round of meetings<sup>4</sup> and shared written input through government platforms.<sup>5</sup> As the lead government agency, MOIS integrated government and non-government input. Following public discussions held during the Open Government Week with wider government participation, a two-week public consultation period, as well as an OGC discussion, the government approved the final 10 commitments—three of which (3, 7, and 8) were initiated by civil society and one was jointly proposed with government (1). Civil society stakeholders noted that participation in future co-creation processes could be improved by facilitating more direct dialogues between government and non-government stakeholders and inviting non-OGC members to subcommittee discussions.<sup>6</sup> The process would also be improved by providing reasoned response to all public proposals. This will be essential during the action plan’s refresh period at its halfway point,<sup>7</sup> and development of the next plan.

The action plan includes three promising commitments. By improving the usability of the administrative appeals system, Commitment 2 could substantially help people to remedy violations of their rights or interests by administrative agencies. Commitment 3 – one of the few commitments initiated by civil society – intends to more than double the amount of government data publicly available, and close citizen-identified gaps in government data provision. Commitment 1 continues important legislative work to strengthen whistleblower protection and financial support. However, beyond legislation, efforts will need to address enforcement and social attitudes towards the whistleblower system to improve the commitment’s potential for anti-corruption results.

The potential for open government results of the remaining commitments is unclear. Most of the commitments on social inclusion have weak or no relevance to OGP values (5, 7, and 9). These commitments aim to help marginalized groups participate broadly in society, but do not seek to actively empower people to participate in government policies and decisions. Based on the OGP Articles of Governance, for commitments to be considered relevant to the OGP value of civic participation, governments must seek to mobilize citizens to engage in public debate, provide input, and make contributions that lead to more responsive, innovative, and effective governance.<sup>8</sup> Strengthening the ability to participate generally is not sufficient. Additionally, while relevant to OGP values, Commitments 4, 6, 8, and 10 continue ongoing initiatives without indication of added value to existing practices.

Given that this is the Republic of Korea’s first four-year plan, the IRM recommends considering an amendment process to strengthen the commitments’ potential for results and OGP relevance. This is permitted within one year of the action plan’s submission.<sup>9</sup> Revised commitments could offer more detail on concrete actions to undertake during implementation. For commitments that are not aligned with OGP values, revisions could provide opportunities for marginalized groups to play an active role in implementation or incorporate information disclosure goals. Commitments that continue ongoing activities could be revised to scale up or further institutionalize efforts. If an amendment process is undertaken, the OGC could also consider adopting more ambitious commitments from the pool of proposals advocated by civil society during co-creation (such as decriminalization of factual defamation or opening energy data) or scaling up impactful commitments from the previous action plan. As noted by the Planning Subcommittee, it is vital to

select more challenging tasks that are relevant to OGP with maturation and development in mind.<sup>10</sup>

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<sup>1</sup> As of February 2024, the Open Government Committee was reformulated with 23 members - 8 representatives from government and 14 from universities, think tanks, and the private sector, and 1 from civil society. See: “대한민국 열린정부위원회” [Open Government Committee], Ministry of Interior and Safety, <https://innovation.go.kr/ucms/main/contents.do?menuNo=300165#> (accessed 21 March 2024).

<sup>2</sup> Lee Sang-hak (Transparency International Korea), interview by IRM researcher, 17 November 2023; Kweon Oh-yeon (Code for Korea), interview by IRM researcher, 24 November 2023; Park Ji-hwan (Open Net), correspondence with IRM researcher, 4 December 2023.

<sup>3</sup> “Results of Open Government Committee’s 1<sup>st</sup> Evaluation of the Government/Public Proposals for 6<sup>th</sup> National Action Plan,” Open Government Committee Korea, 8 March 2023.

<sup>4</sup> Ministry of the Interior and Safety provided IRM with access to OGC subcommittee co-creation meeting minutes.

<sup>5</sup> Comments from Ministry of Interior and Safety during public comment period, 18 April 2024.

<sup>6</sup> Park Ji-hwan (Open Net), interview by IRM researcher, 18 October 2023; Lee, interview; Kweon, interview.

<sup>7</sup> 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.

<sup>8</sup> “Articles of Governance,” Open Government Partnership, <https://www.opengovpartnership.org/articles-of-governance>.

<sup>9</sup> “OGP National Handbook,” Open Government Partnership, 2022, <https://www.opengovpartnership.org/documents/ogp-national-handbook-rules-and-guidance-for-participants-2022>.

<sup>10</sup> “Planning Subcommittee 2<sup>nd</sup> Meeting Minutes,” Open Government Committee Korea, 14 March 2023.

## Section II: Promising Commitments in Republic of Korea 2023–2027 Action Plan

The following review looks at the three 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**

<b>Promising Commitments</b>
<p><b>1. Strengthen whistleblower protection and anti-corruption:</b> This commitment plans to continue legislative work to strengthen whistleblower protection and financial support. It intends to amend the Act on Protection of Public Interest Reporters, along with four other laws that address compensation standards for different types of whistleblowers.</p>
<p><b>2. Open and expand administrative appeals:</b> This commitment would help people to remedy violations of their rights or interests by administrative agencies. It plans to make the complicated administrative appeals system more usable through a new online one-stop-shop.</p>
<p><b>3. Fill data blanks and open list of closed public data:</b> This commitment intends to more than double the amount of government data publicly available. It would disclose a substantial list of data that is held by government but not open to the public and use civic participation to determine what data to open.</p>

### **Commitment 1: Strengthen Whistleblower Protection and Anti-Corruption**

Protection and Reward Policy Division of the Anti-Corruption and Civil Rights Commission

For a complete description of the commitment, see Commitment 1 in the Republic of Korea’s 2023–2027 action plan: <https://www.opengovpartnership.org/documents/republic-of-korea-action-plan-2023-2027-june>.

### **Context and objectives**

This commitment aims to ensure an equal level of support to the different categories of whistleblowers, and expand protection and financial aid. It was proposed by the Anti-Corruption and Civil Rights Commission (ACRC) and carries forward efforts from the previous action plan. The commitment continues a legislative trajectory that started with the 2008 Anti-Corruption Act, which guides public sector whistleblowing on corruption, and the 2011 Protection of Public Interest Reporters Act, which guides private sector whistleblowing on public interest violation.<sup>1</sup> Over a decade of reforms have been gradually strengthening other protection measures for whistleblowers, including banning the disclosure of their personal information, provision of police protection, and prohibition of dismissal or financial loss because of whistleblowing. Correspondingly, the number of whistleblowers receiving protection increased from 2011 to 2023, along with increases in rewards and relief funds to cover losses incurred as a result of whistleblowing.<sup>2</sup>

### **Potential for results: Modest**

This commitment could modestly advance public accountability by continuing amendments to whistleblower legislation. It intends to amend the Protection of Public Interest Reporters Act to

expand the basis for payment of public interest whistleblower rewards from “recovery of revenues of the central or local government” to “recovery of revenues of public institutions.” ACRC has also reported its intention to add 19 laws to the Act’s list of laws that are subject to public interest whistleblower protection—currently 492 laws, up from 180 in 2011.<sup>3</sup> In addition, the commitment would amend five laws covering different types of whistleblower reports to unify compensation standards, specifically the (1) Protection of Public Interest Reporters Act, (2) Anti-Corruption Act, (3) Improper Solicitation and Graft Act, which covers fraudulent solicitations, (4) Public Fund Recovery Act, which covers fraudulent claims, and (5) Prevention of Conflict of Interest Related to Duties of Public Servants Act, which covers conflicts of interest. This would offer an equal level of support to different types of whistleblowers. According to the ACRC,<sup>4</sup> Transparency International Korea,<sup>5</sup> the National Assembly,<sup>6</sup> and several private lawyers,<sup>7</sup> the legislative amendments targeted by this commitment would contribute to rationalizing whistleblower protection, encouraging whistleblower reporting, and combating corruption.

Existing legislative measures have already increased whistleblower reports and corresponding anti-corruption cases. Whistleblower reports increased from 2,821 in 2011 (2,529 in corruption cases and 292 in public interest violations) to 9,858 in 2023 (6,853 in corruption cases and 3,005 in public interest violations). Since the establishment of the former Korea Independent Commission against Corruption (predecessor to ACRC) in 2002 through the end of 2023, corruption whistleblowing has led to the prosecution of 5,579 individuals and disciplinary action against 5,592 individuals. Since the promulgation of the 2011 Protection of Public Interest Reporters Act to the end of 2023, 11,434 cases of public interest violation cases have been confirmed and investigated—out of 23,962 whistleblower reports.<sup>8</sup>

On the other hand, as noted by Transparency International Korea and Justice Solidarity, further efforts are needed to substantially strengthen whistleblower protection.<sup>9</sup> According to People’s Solidarity for Participatory Democracy, one-third of the whistleblowers who were granted protective measures were still penalized, as 1 of 3 prescribed protective measures inspected by the ACRC for the period of May 2019–April 2021 had not been implemented. In the same period, only 5 of 31 inspected cases of institutions failing to implement the prescribed protection measures resulted in the actual imposition of enforcement penalties by the ACRC.<sup>10</sup> Meanwhile, the processing times and withdrawal rates of whistleblower protection cases have been increasing since 2019,<sup>11</sup> though the number of applications for protection has remained steady.<sup>12</sup> Korea’s defamation law also remains a key obstacle, as corrupt actors deter charges against themselves using the threat of criminal prosecution for defamation, and penalties can be imposed for disclosing even factual information.<sup>13</sup>

Transparency International Korea advises that in addition to legislative strengthening, the Republic of Korea takes action to strengthen compliance with, enforcement of, and general society-wide respect for the whistleblower system.<sup>14</sup> Otherwise, the proposed legislative amendments will yield modest gains in promoting whistleblowing and anti-corruption.

### **Opportunities, challenges, and recommendations during implementation**

This commitment offers an opportunity to continue closing the gaps in whistleblower protection legislation. However, legislative protections must be accompanied by stronger implementation, enforcement, and longer-term cultural acceptance of whistleblowers as protectors of public interests. To address these social and cultural dynamics, the following recommendations could enhance this commitment:

- The government can identify and address weaknesses in the enforcement of whistleblower protection, particularly by courts and prosecutors.
- Take action to enforce whistleblowers' confidentiality by applying effective sanctions for negligent disclosure. This effort was initiated by the previous action plan, resulting in amendment of Article 12 (paragraph 4) of the Act on Protection of Public Interest Reporters.<sup>15</sup>
- Civil society and the government could collaborate on continued public information campaigns on whistleblowing, focusing on providing information on accountability mechanisms as well as additional protections and rewards that have been enacted. Trainings and promotional materials can also outline the importance of supporting colleagues who report corruption.
- ACRC's support for the Public-Private Councils for Transparent Society (national and local)—as well as the signing of Integrity Society Pacts—can be continued and expanded to spread anti-corruption culture. The previous action plan committed to support these councils and pacts, but their continuity is currently in question.

### **Commitment 2: Open and Expand Administrative Appeals**

General Administrative Appeals Division of the Anti-Corruption and Civil Rights Commission, Administrative Appeals Integrated Planning Task Force

For a complete description of the commitment, see Commitment 2 in the Republic of Korea's 2023–2027 action plan: <https://www.opengovpartnership.org/documents/republic-of-korea-action-plan-2023-2027-june>.

#### **Context and objectives**

This commitment aims to facilitate and expand the use of Korea's administrative appeals system, which is one of the government's policy tasks.<sup>16</sup> The ACRC proposed its inclusion in the OGP action plan with support from all civil society members of the OGC Anti-Corruption Subcommittee. Administrative appeal is governed by the Constitution of the Republic of Korea and Administrative Appeals Act. Administrative appeals are one of the three channels by which people can seek to remedy the violations of their rights or interests by administrative agencies—the two others being civil complaints and administrative litigation. Unlike civil complaints, rulings on administrative appeals are legally binding on administrative agencies. Compared to administrative litigation, administrative appeals are widely regarded as being simpler, quicker, and cheaper.<sup>17</sup> The average processing period for administrative appeals is 60 to 90 days, compared to the average 289 days it takes for administrative litigation to reach first trial stage.<sup>18</sup> Moreover, unlike administrative litigation, administrative appeals examine not only illegality but also unfairness. Of all administrative appeals in 2022, there were 21,450 general cases with an 8.6% success rate<sup>19</sup> and 10,373 tax adjudication cases with a 12% success rate.<sup>20</sup>

#### **Potential for results: Substantial**

Despite offering a relatively timely and effective channel for civil rights remedy, citizens find it challenging to navigate the system of 123 administrative appeal bodies. There are 57 general administrative appeal bodies subject to the Administrative Appeals Act (the Central Administrative Appeals Committee and municipal and provincial administrative appeals committees). Furthermore, there are 66 special administrative appeal committees for administrative dispositions that require a high degree of specializations and operate under specialized laws, like the Board of Audit and Inspection, National Intelligence Service, National



Election Commission, National Human Rights Commission, Tax Tribunal, Customs Examination Committee, Patent Trial and Appeal Board, Faculty Appeal Review Committee, Health Insurance Dispute Mediation Committee, Central Land Expropriation Commission, and Central Labor Relations Commission.<sup>21</sup> In order to file an administrative appeal, citizens must select the appropriate agency and comply with all of the relevant procedures – which differ from agency to agency and can be technically challenging for non-legal experts.

To address these challenges, this commitment aims to roll out EASY Administrative Appeal, a big data-driven one-stop administrative appeals system, in two phases. The first was launched in December 2022, integrating 57 general administrative appeals agencies. Appeals for any of these agencies can be filed via EASY Administrative Appeal. The second phase, which will integrate all 123 administrative appeals agencies, will be launched by December 2025.

The commitment intends to use the accumulated data in the new system to make it easier for claimants to file administrative appeal by drawing on similar administrative appeal cases. Once a claimant enters basic information, the system will automatically complete the purpose of the claim, summary of the case, and the claimant’s argument.<sup>22</sup> In addition, this commitment plans to increase the disclosure of administrative appeals cases. In June 2023, ACRC launched the Administrative Appeals Integrated Planning Task Force to lead this effort,<sup>23</sup> comprising inter-ministerial (ACRC, Ministry of the Interior and Safety, and Ministry of Government Legislation) and multistakeholder (government, legal experts, and civil society) representation.

This commitment has substantial potential to advance public accountability.<sup>24</sup> Via administrative appeals, citizens are able to redress unfair or illegal government actions (or non-actions) which directly impact their lives. By simplifying the administrative appeal process via a one-stop shop, this initiative is expected to make administrative appeals significantly more convenient for the public. It is also expected to enhance the efficiency of government operations by eliminating duplication of organizations and personnel. As of 2022, with just partial integration of administrative appeal agencies, about 60% of all administrative appeal cases were filed via the EASY Administrative Appeal online system.<sup>25</sup> With integration of all 123 administrative appeal agencies, administrative appeal cases and success rates are likely to increase. This integration effort is supported by 80% citizens, as reported by a 2023 national survey.<sup>26</sup> In 2022, the EASY Administrative Appeal system won the government’s grand prize for document innovation.<sup>27</sup>

### **Opportunities, challenges, and recommendations during implementation**

Developing a one-stop shop covering 123 administrative appeals agencies is a major undertaking. Some aspects of the process will need to be integrated to improve both efficiency and impartiality, while maintaining the expertise needed for specialized administrative appeal fields (e.g., labor, land, insurance, and tax).<sup>28</sup> Thus, the work of the Administrative Appeals Integrated Planning Task Force will be critical. The Task Force will need to objectively analyze the operation of administrative appeal agencies and collect opinions from related agencies, the public, and experts in various fields in order to anticipate and address unforeseen side effects.<sup>29</sup> Moreover, given that administrative appeals are governed by a myriad of laws, legislative amendments and National Assembly promulgation are likely needed as well. To support the implementation process, the IRM recommends:

- Ensure opportunities for consultation throughout implementation, providing a central role for the Administrative Appeals Integrated Planning Task Force. In particular, the

implementation roadmap to be produced by the task force offers an opportunity to consult users about their needs.

- Continue outreach to raise citizens' awareness of the administrative appeals process and EASY Administrative Appeal online system, supporting citizens making use of pathways to remedy the violations of their rights or interests by administrative agencies. This outreach can build on the Anti-Corruption and Civil Rights Commission's awareness raising on its social media platforms.

**Commitment 3: Fill Data Blanks and Open List of Closed Public Data**

Public Data Policy Division of the Ministry of the Interior and Safety, Open Data Forum

For a complete description of the commitment, see Commitment 3 in the Republic of Korea's 2023–2027 action plan: <https://www.opengovpartnership.org/documents/republic-of-korea-action-plan-2023-2027-june>.

**Context and objectives**

To deepen the open government impact of Korea's public data, a civil society member of the OGC Digital Subcommittee proposed this commitment to identify and fill data blanks. Korea has made great strides in open data since the Open Data Act came into effect in 2013. As of the end of 2022, the government had opened 77,000 pieces of data (estimated at more than 87,000 pieces of data as of 2023)—a 15-fold increase since 2013.<sup>30</sup> Private use of open government data has increased by more than 3,300 times since 2013, reaching 31.55 million instances (number of download and open API applications) by 2022.

The government releases data according to its Open Government Data Master Plans and National Core Data Release Plans, covering bundles of data that a multistakeholder process deems to be a priority for the public, based on feedback from the Open Data Forum and surveys of citizens and businesses. The national core data topics are then selected by the Open Data Strategy Council, which comprises government, civil society, academia, and business representatives.<sup>31</sup> Since 2015, 168 national core data bundles have been released (33 in 2015–2016, 63 in 2017–2019, and 72 in 2020–2022). These efforts ranked Korea first in public data provision among the Organization for Economic Cooperation and Development members in 2015–2020.<sup>32</sup>

**Potential for results: Substantial**

This commitment would disclose a substantial list of data that is held by government but not open to the public. A participatory process will be implemented to determine which data would be useful to the public prior to being disclosed. While the action plan itself does not specify the scope of data to be disclosed, a milestone intends to establish a government-wide mid-to-long-term public data disclosure plan. An April 2023 meeting of the Open Data Strategy Council clarified that the draft of this public data disclosure plan aims to disclose 40.6% (106,930 pieces) of currently closed government data (263,342 pieces) by 2025.<sup>33</sup> The civic participation is expected to improve the utility of data for the public.

Transparency International Korea and Open Net, two civil society OGC members, deem this as one of the action plan's most promising commitments.<sup>34</sup> During co-creation, OGC Digital Subcommittee members flagged gaps in open data related to women, persons with disabilities, and energy—the latter of which was proposed as necessary for civic participation in climate action. Indeed, there may be many more such gaps of which people are not aware because they

do not know that such data is held by the government. As noted by a Digital Subcommittee member, by making open data more relevant and useful to the public, this commitment has the potential to empower citizens to hold government accountable and participate in policymaking in a more informed manner.<sup>35</sup>

The commitment also includes milestones that continue ongoing data opening efforts, with the next two National Core Data Release Plans. The fourth National Core Data Release Plan intends to release 32 core data bundles in 2023–2025, while the fifth plan will set targets for 2026–2028.

### **Opportunities, challenges, and recommendations during implementation**

This commitment is innovative as it goes beyond routine government data disclosure—as set forth in the Open Government Data Master Plans and National Core Data Release Plans—to seek enhanced transparency of closed public data and disclosure of data that the public deems useful. However, the milestones, as currently written, do not capture these innovations. To concretize this commitment, the IRM recommends:

- Set clear numeric targets of data disclosure under this commitment, clarifying the link to the Government’s Mid-to-Long-Term Public Data Disclosure Plan.
- Incorporate into the commitment guarantees to open a list of closed public data.
- Specify a mechanism for the public to identify highly demanded public data gaps. As with the selection of national core data bundles, broader civic participation such as via the multistakeholder Open Data Strategy Council could help determine which data would be most useful to open.
- Curate and present data in ways that enhance the user-friendliness of open data.

### **Other commitments**

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

Three of the action plan’s commitments (5, 7, and 9) have weak or no relevance to open government values. These commitments aim to help marginalized groups participate broadly in society, but do not seek to actively empower people to participate in the making of government policies and decisions. Based on OGP Articles of Governance, for commitments to further the OGP value of civic participation, governments must seek to mobilize citizens to engage in public debate, provide input, and make contributions that lead to more responsive, innovative, and effective governance.<sup>36</sup> Strengthening the ability to participate generally is not sufficient. Efforts to revise these commitments could strengthen their open government lens by providing opportunities for marginalized groups to play an active role in their implementation or by incorporating information disclosure. Commitment 5 on expanding digital access could be aligned with OGP values by introducing mechanisms for the public to participate in decision making or accountability on digital government administrative services. Commitment 7 on hate speech could strengthen its open government relevance by expanding the public’s role in decision making on government policies on hate speech and how to combat it, while not infringing on freedom of speech. This could build on the National Human Rights Commission’s existing efforts to involve citizens in monitoring and revising a hate speech response plan. Commitment 9 on designing accessible tourist facilities could be aligned with OGP values by

expanding consultation with the public about which facilities to build and how to employ universal accessibility in their design.

Four commitments (4, 6, 8, and 10) are relevant to OGP values but continue ongoing activities without planned milestones to scale up or further institutionalize efforts. Commitment 4 would support government to make informed decisions drawing on existing civil complaints data. Commitment 6 intends to engage the public to design solutions by continuing the Open Data Forum. These commitments leverage data to help government understand and address citizen priorities but offer limited channels for public participation. To enhance its potential for results, Commitment 6 could be reoriented to substantially expand the scope and resources for Open Data Forum activities and Living Labs, focusing on public engagement in solutions that will be sustained in the long-term. Likewise, Commitment 8 on designing accessible public facilities could be reoriented to support substantial expansion of the existing Public Design Idea Contest or of civic participation in government decision making on infrastructure projects. For Commitment 10, implementers could set more ambitious targets for expanding marginalized groups' media access over the four-year period, or could consider steps to widen participation in the government committee on accessible broadcasting.

<sup>1</sup> “제 5 차 열린정부 실행계획(2021~2023) 추진 실적” [Performance of the 5<sup>th</sup> OGP Action Plan], Open Government Committee Korea, 30 August 2023, <https://www.innovation.go.kr/ucms/bbs/B0000034/view.do?nttd=13008&sort=01&menuNo=300193&searchCnd=&searchType=5&searchWrd=&requestURI=%2Fucms%2FpcyDta%2FpcyDta%2Fsearch.do&groupId=pcyDta&lcnt=10&searchKeyword=&pageIndex=1>; Anti-Corruption and Civil Rights Commission of Korea, correspondence with IRM researcher, 15 November 2023.

<sup>2</sup> Anti-Corruption and Civil Rights Commission, “국민권익 백서” [Civil Rights and Interests White Paper], 2023, <https://www.data.go.kr/data/15033709/fileData.do>; “ACRC Korea Annual Report 2022,” Anti-Corruption and Civil Rights Commission of Korea, 1 October 2021, [https://www.acrc.go.kr/synap/skin\\_v2022\\_21.10.1/doc.html?fn=16892865424431.pdf&fno=2022%20ACRC%20Annual%20Report.pdf&rs=/synapfile/64/202401](https://www.acrc.go.kr/synap/skin_v2022_21.10.1/doc.html?fn=16892865424431.pdf&fno=2022%20ACRC%20Annual%20Report.pdf&rs=/synapfile/64/202401).

<sup>3</sup> Anti-Corruption and Civil Rights Commission of Korea, correspondence.

<sup>4</sup> Anti-Corruption and Civil Rights Commission of Korea, correspondence.

<sup>5</sup> Lee Sang-hak (Transparency International Korea), interview by IRM researcher, 17 November 2023.

<sup>6</sup> “국회도서관, 내부고발자 보호 확대·강화...공익 수호자로 역할 할 것” [National Assembly Library expands and strengthens protection for whistleblowers ...Acting as a guardian of the public interest], Reader's News, 6 September 2023, <https://www.readersnews.com/news/articleView.html?idxno=109659>.

<sup>7</sup> “Public Interest Reporters Protection Act: A Public Debate Commemorating the 10<sup>th</sup> Anniversary of Implementation & 10-Year Performance Sharing and Institutional Redesign Plan.”

<sup>8</sup> Anti-Corruption and Civil Rights Commission, “국민권익 백서” [Civil Rights and Interests White Paper], 2023, <https://www.data.go.kr/data/15033709/fileData.do>.

<sup>9</sup> Lee, interview; Kim Eun-hae, “정의연대” 명예훼손죄 비범죄화’ 민사로 통합해야” [Justice Solidarity: ‘Decriminalization of defamation’ should be integrated into the Civil Code], Indifocus, 3 January 2022, <http://www.indifocus.kr/34871>.

<sup>10</sup> People’s Solidarity for Participatory Democracy, “공익제보자 보호 제대로 되고 있나 「공익신고자 보호법」 제정 10년” [Are public interest reporters protected properly? An Analysis Report on the 10-Year Operation of the System enacted in the Act on Protection of Public Interest Reporters], 01 Oct 2021, <https://www.peoplepower21.org/pspdarchive/1824192>.

<sup>11</sup> Lee Jae-hyuk, “‘신고자 스스로 보호 포기’...권익위 보호신청, 평균 처리기간 증가 취하율 ‘급증’,” [‘The reporter gave up his own protection’: Application for protection by the Civil Rights Commission, withdrawal rate ‘surges’ as average processing time increases], 10 October 2023, <https://mtdtoday.co.kr/news/view/1065572197106557>

<sup>12</sup> Anti-Corruption and Civil Rights Commission, “국민권익 백서” [Civil Rights and Interests White Paper].

<sup>13</sup> Lee, interview; Kim, “Justice Solidarity: ‘Decriminalization of defamation’ should be integrated into the Civil Code.”

<sup>14</sup> Lee, interview.

- <sup>15</sup> 공익신고자 보호법 [Act on Protection of Public Interest Reporters], Article 12, <https://www.law.go.kr/LSW/lsInfoP.do?lsiSeq=260033&lsId=&eYd=20240206&chrClsCd=010202&urlMode=lsEInfoR&viewCls=lsRvsDocInfoR&ancYnChk=0#>.
- <sup>16</sup> Park Jong-min, “행정심판, 불편한 진실” [Administrative Appeals, An Inconvenient Truth], Law Times, 23 July 2023, <https://www.lawtimes.co.kr/opinion/189527>; Kim Eun-jin, ““어디로 가야 하죠” 번지수 헷갈리는 행정 심판 기관, 하나로 뭉친다” [“Where should I go?” Administrative adjudication agencies with confusing street addresses unite as one], YTN Radio, 4 August 2023, [https://m.radio.ytn.co.kr/interview\\_view.php?id=90845&s\\_mcd=0433](https://m.radio.ytn.co.kr/interview_view.php?id=90845&s_mcd=0433).
- <sup>17</sup> “Taking a big stride forward on transparency & civil rights”; “행정심판제도 개선방안 연구” [Study on the improvement of the administrative appeals system], National Assembly of Korea, December 2019, <https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwiml5uR8feDAXWIkQIHxrsB-MQFnoECA4QAQ&url=https%3A%2F%2Fopen.assembly.go.kr%2Fportal%2Fdata%2Fsheet%2FdownloadFileData.do%3Finfld%3D08685D0008489413266%26infSeq%3D1%26fileSeq%3D1%26dataSeqceNo%3D123003509&usq=AOvVaw337X8NGY8r2FAR-y5dBGHi&opi=89978449>; “원스톱 행정심판 확대해야” 김기표 전 중앙행정심판위원회 위원장 [“One-stop administrative trials must be expanded,” Kim Ki-pyo, former chairman of the Central Administrative Appeals Commission], Law Times, 14 January 2023, <https://www.lawtimes.co.kr/news/184553>.
- <sup>18</sup> “Taking a big stride forward on transparency & civil rights”; “Study on the improvement of the administrative appeals system.”
- <sup>19</sup> “ACRC Korea Annual Report 2022”; “중앙행정심판 연도별 사건처리 현황” [Central Administrative tribunal case processing status by year], Central Administrative Appeals Commission, <https://www.simpan.go.kr/nsph/sph240.do>.
- <sup>20</sup> “최근 5 년간 조세심판 처리현황” [Tax judgment processing status for the past 5 years], Jipyong, 4 April 2023, [https://www.jipyong.com/newsletter/tax/230404/230404\\_1.pdf](https://www.jipyong.com/newsletter/tax/230404/230404_1.pdf).
- <sup>21</sup> “Study on the improvement of the administrative appeals system”; “Taking a big stride forward on transparency & civil rights”; “Administrative Appeals, An Inconvenient Truth.”
- <sup>22</sup> “Administrative Appeals, An Inconvenient Truth”; ““Where should I go?” Administrative adjudication agencies with confusing street addresses unite as one”.
- <sup>23</sup> “Administrative Appeals, An Inconvenient Truth”.
- <sup>24</sup> Lee, interview; ““Where should I go?” Administrative adjudication agencies with confusing street addresses unite as one”; ““One-stop administrative trials must be expanded,” Kim Ki-pyo, former chairman of the Central Administrative Appeals Commission”.
- <sup>25</sup> ““Where should I go?” Administrative adjudication agencies with confusing street addresses unite as one”.
- <sup>26</sup> “국민 10 명 중 8 명, ‘행정심판 통합’ 찬성” [8 out of 10 citizens support ‘integration of administrative trials’], DWB News, 1 September 2023, <https://www.dwbnews.kr/news/articleView.html?idxno=55398>.
- <sup>27</sup> “국민권익위, ‘행정심판 청구서 자동완성 서비스’ 제 1 회 문서혁신 경진대회 최우수상 받아” [Civil Rights Commission won the grand prize in the 1<sup>st</sup> Document Innovation Contest for ‘Automatic Completion Service for Administrative Appeal Claims’], Anti-Corruption and Civil Rights Commission, 6 December 2023, [https://www.acrc.go.kr/board.es?mid=a10402010000&bid=4A&list\\_no=43138&act=view](https://www.acrc.go.kr/board.es?mid=a10402010000&bid=4A&list_no=43138&act=view).
- <sup>28</sup> ““Where should I go?” Administrative adjudication agencies with confusing street addresses unite as one”; “Integrated administrative appeals: Listening to experts and academics,” Naver, 12 October 2023, <https://blog.naver.com/ash1106219/223234056841>.
- <sup>29</sup> ““One-stop administrative trials must be expanded,” Kim Ki-pyo, former chairman of the Central Administrative Appeals Commission”; Lee, interview.
- <sup>30</sup> “공공데이터 개방” [Open public data], Ministry of the Interior and Safety, <https://www.mois.go.kr/frt/sub/a06/b02/openData/screen.do>; Park Hyun-jin, ““공공데이터의 미래 발전 방향을 모색하다”...행안부-NIA, 공공데이터법 제정 10 주년 기념식 및 발전 심포지엄 개최” [Exploring the future development direction of public data: Ministry of Public Administration and Security-NIA hold 10<sup>th</sup> anniversary ceremony and development symposium on the enactment of the Open Data Act], Artificial Intelligence Times, , 18 October 2023, <https://www.aitimes.kr/news/articleView.html?idxno=29140>.
- <sup>31</sup> Lim Hye-jeong, “Open data to improve transparency and drive growth,” Open Government Partnership, 13 March 2023, <https://www.ogpstories.org/open-data-to-improve-transparency-and-drive-growth>.
- <sup>32</sup> “Exploring the future development direction of public data: Ministry of Public Administration and Security-NIA hold 10<sup>th</sup> anniversary ceremony and development symposium on the enactment of the Open Data Act”.
- <sup>33</sup> “Open data strategy council meeting minutes,” Open Government Committee Korea, 10 April, 2023.
- <sup>34</sup> Lee Sang-hak (Transparency International Korea), correspondence with IRM researcher, 24 November 2023; Park Ji-hwan (Open Net), correspondence with IRM researcher, 4 December 2023.
- <sup>35</sup> “Digital subcommittee 1<sup>st</sup> meeting minutes,” Open Government Committee Korea, 3 March 2023.

<sup>36</sup> “Articles of Governance,” Open Government Partnership, <https://www.opengovpartnership.org/articles-of-governance>.

## 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, represent a high priority for country stakeholders, acknowledged as 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 the IRM identifies to inform a stronger implementation process.
- **Midterm 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, and/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, et cetera)? 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.

This review was prepared by the IRM in collaboration with Nancy Y. Kim as researcher and Thomas Kalinowski as external expert reviewer. 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).<sup>1</sup> The IRM methodology, product quality, and review process are overseen by the IEP.<sup>2</sup>

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<sup>1</sup> “International Experts Panel,” Open Government Partnership, accessed 15 July 2024, <https://www.opengovpartnership.org/about/who-we-are/international-experts-panel>.

<sup>2</sup> For more information, see: “Overview – Independent Reporting Mechanism,” Open Government Partnership, accessed 15 July 2024, <https://www.opengovpartnership.org/irm-guidance-overview>.



## Annex 1. Commitment by Commitment Data

<p><b>Commitment 1: Strengthen Public Interest Whistleblower Protection and Support for Anti-Corruption</b></p> <ul style="list-style-type: none"> <li>• Verifiable: Yes</li> <li>• Does it have an open government lens? Yes</li> <li>• Potential for results: Modest</li> </ul>
<p><b>Commitment 2: Open and Expand Data on Administrative Appeals and Autofill Request Form Service</b></p> <ul style="list-style-type: none"> <li>• Verifiable: Yes</li> <li>• Does it have an open government lens? Yes</li> <li>• Potential for results: Substantial</li> </ul>
<p><b>Commitment 3: Fill Data Blanks and Open List of Closed Public Data</b></p> <ul style="list-style-type: none"> <li>• Verifiable: Yes</li> <li>• Does it have an open government lens? Yes</li> <li>• Potential for results: Substantial</li> </ul>
<p><b>Commitment 4: Forecast Public Hazard Through Monitoring of Big Data on Civil Complaints</b></p> <ul style="list-style-type: none"> <li>• Verifiable: Yes</li> <li>• Does it have an open government lens? Yes</li> <li>• Potential for results: Unclear</li> </ul>
<p><b>Commitment 5: Create Safe and Inclusive Digital Society</b></p> <ul style="list-style-type: none"> <li>• Verifiable: Yes</li> <li>• Does it have an open government lens? No</li> <li>• Potential for results: Unclear</li> </ul>
<p><b>Commitment 6: Conduct Public-Private Responses Through Introduction of Civic Tech</b></p> <ul style="list-style-type: none"> <li>• Verifiable: Yes</li> <li>• Does it have an open government lens? Yes</li> <li>• Potential for results: Unclear</li> </ul>
<p><b>Commitment 7: Enhance Public Discussion to Prevent Hate Speech</b></p> <ul style="list-style-type: none"> <li>• Verifiable: Yes</li> <li>• Does it have an open government lens? Yes</li> <li>• Potential for results: Unclear</li> </ul>
<p><b>Commitment 8: Improve Universal Design System and Spread of Awareness</b></p> <ul style="list-style-type: none"> <li>• Verifiable: Yes</li> <li>• Does it have an open government lens? Yes</li> <li>• Potential for results: Unclear</li> </ul>

**Commitment 9: Create Environment for Accessible Tourism**

- Verifiable: Yes
- Does it have an open government lens? No
- Potential for results: Unclear

**Commitment 10: Expand Media Access for Marginalized Groups**

- 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 OGP Participation and Co-Creation Standards that came into force on 1 January 2022.<sup>1</sup> The IRM assesses all countries that submitted action plans from 2022 onward under the updated standards. Table 2 outlines the extent to which the countries' participation and co-creation practices meet the minimum requirements that apply during development of the action plan.

OGP instituted a 24-month grace period to ensure a fair and transparent transition to the updated standards. Action plans co-created and submitted by 31 December 2023 fall within the grace period. The IRM will assess countries' alignment with the standards and their minimum requirements.<sup>2</sup> However, countries will only be found to be acting contrary to process if they do not meet the minimum requirements for action plans co-created in 2024 and onwards.

**Table 2. Compliance with minimum requirements**

Minimum requirement	Met during co-creation?	Met during implementation ?
<b>1.1 Space for dialogue:</b> During the co-creation period, the Open Government Committee (OGC) was comprised of 8 government, 10 civil society, and 12 academia and private sector members, <sup>3</sup> and met four times. Its four Subcommittees on Planning, Anti-Corruption, Digital, and Civic Participation each held three to five meetings during the co-creation period. The Republic of Korea's OGP website publishes information on the OGC mandate, composition, Regulations on the Establishment and Operations of the Open Government Committee of the Republic of Korea, and meeting minutes. <sup>4</sup>	Yes	<i>To be assessed in the Midterm Review</i>
<b>2.1 OGP website:</b> The OGP website is publicly accessible through the 'Innovation 24' website, which has the latest action plan, information on OGP and OGC, and a public discussion board. <sup>5</sup>	Yes	<i>To be assessed in the Midterm Review</i>
<b>2.2 Repository:</b> The OGP repository is updated more than twice a year. It published OGC meeting minutes, information on Open Government Week activities, and an invitation for public feedback on the action plan. However, commitment proposals submitted by the public, OGC responses to these proposals, and subcommittee meeting minutes were not publicly available. The OGP website does not contain a link to the repository, which would make it easier for the public to navigate to the repository. <sup>6</sup>	Yes	<i>To be assessed in the Midterm Review</i>
<b>3.1 Advanced notice:</b> On 27 September 2022, the government provided two-week notice of a public call for proposals that began on 11 October 2022, and a brief timeline for discussion and finalization of the proposals. <sup>7</sup>	Yes	<i>To be assessed in the Midterm Review</i>
<b>3.2 Outreach:</b> Public outreach was conducted by advertising the co-creation process and public participation opportunities on government and non-government stakeholders' platforms and media outlets. <sup>8</sup>	Yes	Not applicable
<b>3.3 Feedback mechanism:</b> In addition to multistakeholder OGC meetings, input from a range of stakeholders was gathered through a public contest for ideas (11 October–14 November 2022), public discussions on proposed commitments during Open Government Week	Yes	Not applicable

(May 2023), and an online public comment period for draft Action Plan (26 June–9 July 2023). <sup>9</sup>		
<b>4.1 Reasoned response:</b> Commitment proposals were documented in subcommittee co-creation meeting minutes, which were available to OGC members but not the public. <sup>10</sup> OGC did not provide reasoned response to these proposals. It did not follow up with stakeholders whose commitment proposals were deemed not relevant to OGP values. For others, OGC informed stakeholders of how they could continue to participate in co-creation but did not provide a direct response to their proposals. <sup>11</sup>	No	<i>To be assessed in the Midterm Review</i>
<b>5.1 Open implementation:</b> 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 Midterm Review</i>

The development of the Republic of Korea’s sixth action plan did not meet one of the minimum requirements of the OGP Participation & Co-Creation Standards as the OGC did not provide sufficient reasoned response to stakeholders’ contributions. As this action plan undertakes a four-year implementation period, the plan will have a refresh period after two years. This is an opportunity for stakeholders to reflect on the implementation of the action plan, assess next steps, and determine a way forward to ensure strong ambition and results. The IRM will assess compliance with minimum requirements 1.1, 2.1, 2.2., 3.1, 4.1, and 5.1 at the midpoint, after submission of the refreshed action plan. To meet OGP standards during this period, IRM particularly recommends the OGC documents and reports back or publishes written feedback to stakeholders on how their contributions were considered during the refresh period.

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

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

<sup>3</sup> Lee Sang-hak (Transparency International Korea), interview by IRM researcher, 17 October 2023; Park Ji-hwan (Open Net), interview by IRM researcher, 18 October 2023; Kweon Oh-yeon (Code for Korea), interview by IRM researcher, 18 October 2023; “Meeting Records,” Open Government Committee Korea, 27 August 2021.

<sup>4</sup> “열린정부파트너십” [Open Government Partnership], Ministry of the Interior and Safety, <https://www.innovation.go.kr/ucms/main/contents.do?menuNo=300165> (accessed 15 December 2023); “정책자료” [Policy Materials], Ministry of the Interior and Safety, <https://www.innovation.go.kr/ucms/pcyDta/pcyDta/search.do?searchType=5&menuNo=300193&sort=01&searchCnd=&pageIndex=1&searchWrd=> (accessed 15 December 2023).

<sup>5</sup> “Open Government Partnership.”

<sup>6</sup> “Policy Materials.”

<sup>7</sup> “[안내] 제 6 차 열린정부 실행계획 제안 공모 계획” [Notice: 6<sup>th</sup> Open Government Action Plan proposal contest], Ministry of the Interior and Safety, 27 September 2022, <https://www.innovation.go.kr/ucms/bbs/B0000001/view.do?nttlId=9826&menuNo=300115&pageIndex=1> (accessed 3 May 2024).

<sup>8</sup> “Open government plan public proposal contest to share with the international community.”

<sup>9</sup> “Open government plan public proposal contest to share with the international community”; “Notice: 6<sup>th</sup> Open Government Action Plan proposal contest”; “세계열린정부주간 ‘국민이 만드는 열린정부’ 행사개최 안내” [Information on the ‘Open Government Created by the People’ event], Ministry of the Interior and Safety, 26 April 2023, <https://www.innovation.go.kr/ucms/bbs/B0000034/view.do?nttlId=11101&sort=01&menuNo=300193>.

<sup>10</sup> Ministry of the Interior and Safety provided IRM with access to OGC subcommittee co-creation meeting minutes.

<sup>11</sup> Ministry of the Interior and Safety, correspondence with IRM, 19 December 2023.