Independent Reporting Mechanism

Action Plan Review: Tunisia 2023–2025

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Section I: Overview

Tunisia's fifth action plan largely continues ongoing reforms to strengthen government transparency. It includes promising commitments to continue opening data, with a focus on public project performance and environmental data. Commitments with the most promise also seek to strengthen fiscal transparency and support open government at the municipal level.

Tunisia's fifth action plan comprises 15 commitments covering natural resource governance transparency, public participation and open government at the local level, public accountability and integrity, and development and digitalization of administrative services. The plan also includes reform on the inclusion of women and persons with disabilities for the first time and aligns with broader government strategies such as the National Open Public Data Program. Furthermore, five Tunisian local governments are currently members of the OGP Local program.[1]

This review analyzes six promising commitments in depth. Four of these commitments are implemented by the E-Government Unit of the Presidency which serves as the focal point for OGP in Tunisia, and one implemented by the civil society organization Solidar. These six commitments continue ongoing reforms with support from civil society and international partners. They share a strong open government lens and are less likely to be impacted by political dynamics. Promising commitments include Commitments 1, 4, 6, and 7, which aim to strengthen budget transparency and open data, while Commitments 8 and 9 seek to strengthen open government at the municipal level and increase the civic participation of underrepresented groups.

> ## AT A GLANCE
>
> **Participating since** 2014
> **Number of commitments:** 15
>
> **Overview of commitments:**
> Commitments with an open government lens: 10 (66%)
> Commitments with substantial potential for results: 0 (0%)
> Promising commitments: 6
>
> **Policy areas:**
> Carried over from previous action plans:
> - Access to Information
> - Financial Transparency
> - Open Data
> - Municipal Open Government
> - Youth Participation
> - Digital Participation
> - Digitalization of Public Services
>
> Emerging in this action plan:
> - Inclusion of Women and Persons with Disabilities
>
> **Compliance with OGP minimum requirements for co-creation:** Yes

Tunisia's fifth action plan aims to incrementally consolidate and expand commitments from previous plans. Continued commitments either incorporated lessons, have a strengthened design, or have more participatory elements than their predecessors. Other commitments have an expanded scope such as an increase in the number of engaged municipalities or targeted government agencies. Most commitments in this action plan have a modest potential for results.

Similar to the previous action plan, most commitments seek to enhance government transparency, with some aiming to enhance public accountability or civic participation. While

access to information is vital, it can be viewed as a step towards more ambitious reforms that increase opportunities for civic participation and public accountability. As such, creating channels for citizens to better hold their government accountable remains an area for opportunity. Four commitments (2 and 3 on digitalization of public services as well as 11 and 12 on public sector integrity) have an unclear potential for results primarily due to a weak open government lens.

At the time of writing, Tunisia is under an eligibility review for falling below the OGP eligibility criteria regarding budget transparency and asset disclosure as well as the civic space check with regards to the environment in which civil society operates.[2] The status of Tunisia's civic space makes the potential to realize the objectives of Commitments 10 and 13 unclear.[3] Prevailing rhetoric may also complicate collaboration between the government and civil society organizations (CSOs) during implementation. The passage of Decree-Law No. 2022-54 on Cybercrime has led to an increased prosecution of journalists, lawyers, and activists.[4] If passed, Draft Decree Law No. 027/2023 could increase government control over the work and finances of CSOs, which in turn further restricts civic space.[5] Protecting freedoms of expression, association, and assembly is important for reformers to achieve open government objectives.

Tunisia's OGP process continues to benefit from an engaged team in government, a dedicated OGP Advisory Committee, and international partners. However, it continues to lack a high-level government point of contact for OGP. To develop the action plan, Tunisia held in-person sessions and used an online e-participation platform to receive commitment proposals. The OGP team conducted sessions and engaged citizens and groups outside of the capital.[6] Advocacy efforts led by the committee resulted in the inclusion of Commitment 1 on fiscal transparency as well as a proposal for gender data dissemination, though the latter was ultimately not adopted.[7]

Civil society reported satisfaction with the co-creation process while indicating areas of improvement. Positively, new CSOs were invited to participate. However, this can hinder the quality of commitment proposals when not accompanied by sufficient sensitization.[8] The E-Government Unit noted that they welcome new proposals and are available for clarifications and explanations as needed.[9] Civil society further highlighted that there is also opportunity for more media attention to reach citizens and groups beyond those already participating in the development of the action plan.[10]

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[1] These are Carthage, Dar Chaabane El Fehri, El Kef, Regueb, and Zriba. For more information, see: "OGP Local," *Open Government Partnership*, https://www.opengovpartnership.org/ogp-local.

[2] "Tunisia – Eligibility Review Letter (September 2022)," *Open Government Partnership*, 26 September 2022, https://www.opengovpartnership.org/documents/tunisia-eligibility-review-letter-september-2022; "Tunisia – Under Review Letter (July 2021)," *Open Government Partnership*, 15 July 2021, https://www.opengovpartnership.org/ documents/tunisia-under-review-letter-july-2021; "2024 OGP Eligibility Scores - Public," *Open Government Partnership*, 3 July 2024, https://docs.google.com/spreadsheets/d/1xOIX3xGcwHYnjY5lG1ceV6f9Rtj6JwmMa5x8e41WB0I/edit.

[3] "New draft law threatens freedom of association," *Civicus*, 2 December 2023, https://monitor.civicus.org/explore/new-draft-law-threatens-freedom-of-association; "Tunisia's escalating crackdown: Anti-racism and migrants' rights activism under attack," *Civicus*, 23 May 2024, https://lens.civicus.org/tunisias-escalating-crackdown.

[4] "Décret-loi n° 2022-54 du 13 septembre 2022, relatif à la lutte contre les infractions se rapportant aux systèmes d'information et de communication," *Center for Security Sector Governance*, 13 September 2022, https://legislation-securite.tn/latest-laws/decret-loi-n-2022-54-du-13-septembre-2022-relatif-a-la-lutte-contre-les-infractions-se-rapportant-aux-systemes-dinformation-et-de-communication; "Analysis of Tunisia: Decree-law No 54 of 2022," *Article-19*, January 2023, https://www.article19.org/wp-content/uploads/2023/03/Analysis-of-decree-law-54-English.pdf; "Tunisia: Authorities escalate clampdown on media, freedom of expression," *Amnesty International*, 30 May 2024, https://www.amnesty.org/en/latest/news/2024/05/tunisia-authorities-escalate-clampdown-on-media-freedom-of-expression.

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[5] "Draft Decree Law No. 027/2023 regulating associations," *Assembly of People's Representatives*, 12 October 2023, https://www.arp.tn/ar_SY/loi/project/3957; "New draft law threatens freedom of association," *Civicus*.
[6] Civil society representative, interview by IRM researcher, 23 May 2024.
[7] International organization representative, correspondence with IRM researcher, 20 August 2024.
[8] Civil society representative, interview by IRM researcher, 28 May 2024.
[9] E-Government Unit of the Presidency, pre-publication review comment, 29 October 2024.
[10] Civil society representative, interview, 23 May.

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Section II: Promising Commitments

The following review looks at the four commitments or clusters 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
Commitment 1: Promote Fiscal Transparency seeks to increase budget transparency through the launch of an updated open budget portal and simplified versions of state and municipal budgets.
Commitment 4: Enhancing Transparency at the Level of Public Projects intends to generate open data on public projects and to leverage open data practices to improve public program performance.
Commitments 6 and 7: Promoting Open Data Cluster promises to increase availability and use of open data.
Commitments 8 and 9: Open Municipal Government Cluster aims to open government at the municipal level through action plan implementation and engaging youth and women in project design and implementation.

Commitment 1: Promote Financial Transparency [Ministry of Finance]

For a complete description, see Commitment 1 in [Tunisia 2023–2025 Action Plan](#).

Context and objectives
Fiscal transparency has remained a longstanding priority for both civil society and the Ministry of Finance (MOF) in Tunisia. Bolstered by international support for civil society capacity building and technical support for the MOF, financial transparency has been included in all the previous four action plans to date.[1] However, incomplete implementation of the fiscal transparency commitment in the fourth plan has led to two of the three activities being rolled over to this period.[2] The Tunisian OGP Advisory Committee advocated for inclusion of this commitment in part to seek to improve Tunisia's OGP eligibility score,[3] which has fallen below OGP's eligibility criteria due to the unavailability of the executive budget proposal and audit report.[4]

This commitment consists of two activities designed to further entrench financial transparency. The first seeks to develop and launch a new version of the *Mizaniatouna* open budget portal that is aligned with the requirements of a program-based budgeting approach set out in the Organic Budget Law 2019 No. 15.[5] Program-based budgeting provides details on the cost of every program within a budget, enabling greater transparency of how money is being spent, to help consolidate and operationalize the transformative potential of budget transparency. Key to this is Article 46 which compels the publication of 13 budget reports that advance transparency aims.[6]

The second activity intends to produce simplified versions of state and municipal budgets for citizens (i.e., Citizen's Budget) in accessible formats for persons with disabilities. The World Bank

has been providing technical support to the MOF on developing the website. The reform also aligns with the other open data projects on which the World Bank is also providing support.

Potential for results: Modest
Tunisia was the first country in the Middle East and North Africa (MENA) region to create an open budget portal in 2015.[7] However, it has been plagued with technical difficulties over the years. Issues with automatically updating information, for instance, have precluded it from providing accessible information about government budget and priorities in a timely manner. At the time of writing, the portal only featured data from 2008–2016. The shift to program-based budgeting has effectively rendered the portal outdated and non-compliant with current legal requirements.

The redevelopment of the portal seeks to offer significantly improved accessibility and details. Users would be able to track expenditures down to, for instance, the purchase of paper and equipment for each agency.[8] It also aims to improve the timeliness of information updates by enabling the creation of provisional budget closing reports. This is designed to bypass the lengthy approval process of issuing final budget closing reports, as this requires parliamentary endorsement which has caused significant delays in the past.[9]

Planned participatory consultations aim to ensure that the information provided corresponds with users' priorities. The MOF asked their civil society partners to conduct surveys and use a participatory approach to provide them with recommendations and a vision.[10] The specifications document has also been shared with civil society for their input,[11] which is confirmed by a civil society representative who indicated that civil society was "consulted immediately after the specifications were drawn up, and a second time as development progressed."[12]

The MOF has institutionalized the practice of publishing a Citizen's Budget in a timely manner.[13] Citizen's budgets are designed to explain the objectives and content of the budget—and thus, state priorities—in plain language to the public. During the previous action plan, the citizen budget commitment was focused on benchmarking, with the Global Initiative for Fiscal Transparency (GIFT) organized three online workshops to present some experiences and an evaluation of the Tunisian version of the citizen budget.[14]

In partnership with the MOF, this project is currently being undertaken by *Le Forum Civil OGP* (OGP Civil Forum), a multistakeholder body of civil society organizations consisting of previous and current CSO members of the OGP Advisory Committee with support from Expertise France.[15] While the MOF has published citizen budgets annually, this project is aimed at simplifying and making the documents more accessible, for which the MoF is considering proposals to provide the budget documents in Braille, sign language, and video versions.[16]

Overall, evidence of notable results would include the publication of comprehensive, timely, and accessible budget information that better enables the public to understand and participate in the budget process. Substantial results could include evidence that civil society, the media, and others are using the budget information to engage in public debate and participate in government decision making. This could take the form of, for example, participation in budget consultations, discussions on gender or climate budgeting, publication of responses to public input on *Mizaniatouna*, or strengthening the institutionalization of channels for civil society to co-create and implement budget transparency reforms.

Opportunities, challenges, and recommendations during implementation
Discussions with various civil society representatives have indicated the importance of ensuring that the information provided correspond to users' needs.[17] This can be done by adopting a

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participatory approach that features sustained, inclusive, and multistakeholder consultations during both the preparatory and implementation stages.

Developing and launching a new open budget portal is occurring in tandem with the government's move towards institutionalizing program-based budgeting, which is also occurring simultaneously with the digitalization of MOF records. The sheer scale of these shifts, and the degree of their interrelatedness, account for previous delays in launching the platform and could cause future delays as well. Meanwhile, the prevailing political context may pose challenges for the implementation of this commitment. Laudably, the MOF has continued to advance transparency reforms despite resistance from other areas of government. Civic space concerns may inhibit government collaboration with civil society and broader civic participation efforts.[18]

Building on open budget momentum, reformers can consider next steps to bolster civic participation in budgetary processes and public accountability for budget oversight. Possible steps to that end include:

- As part of producing the citizen budget in accessible formats for persons with disabilities, **representatives from at least one disability-rights group can be invited**, **listened to, and have their suggestions meaningfully incorporated** into the project.
- A participatory approach can inform decisions on how to disseminate and distribute the Citizen's Budget so that it reaches the public. Currently, it is only published on the MOF website.[19] Including it on the open budget platform would ensure findability of this information, as citizens would be able to locate all budget-related information in one place. To that end, the MOF could **centralize all budget information on the open budget portal**, such as the 13 budget reports outlined by Article 46 of the Budget Law.
- The MOF is studying the possibility of **integrating gender-responsive budgeting and climate budgeting**.[20] These could widen the ambition and scope of this commitment, especially as they are civil society proposals.[21] Even more ambitious would be "double mainstreaming" in the form of gender-responsive climate budgeting.[22] Again, a participatory approach can help ensure that these interventions are addressing citizens' real needs. The ministry can consider inviting and listening to organizations focusing on women's issues and climate concerns.
- **Organize awareness campaigns and public forums** on budgetary issues and **encourage citizens to actively participate**, which can lay the foundations for widened civic participation on budget governance.
- **Establish online tools and participatory platforms to allow citizens monitor public spending and provide feedback on fiscal policies.** The *Mizaniatouna* platform can be designed so as to allow for easy integration of participatory interaction and feedback mechanisms on the budget at a later date.

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Commitment 4: Enhancing Transparency at the Level of Public Projects [Solidar Tunisia]

For a complete description, see Commitment 4 in [Tunisia 2023–2025 Action Plan](#).

Context and objectives
Commitment 4 stands out for its intent to create an observatory designed to generate open data on public projects and to use open data to improve public programs in an underserved governorate and national waste management projects. As suboptimal solid waste management has led to serious environmental and health problems, this commitment responds to issues of national importance.[23]

Open data has been consistently prioritized across Tunisian OGP action plans. This is the first time that a civil society organization is solely responsible for implementation. Solidar proposed this commitment building on their policy research, which identified a need to provide "public authorities new tools and means to improve public policy design."[24] They thus sought to pursue projects bolstering the practice of evidence-based analysis, which inherently requires the provision of centralized, reliable, and reusable data on government projects. The Swiss Agency for Development and Cooperation (SDC) and National Democratic Institute (NDI) provide funding and technical support. The E-Government Unit stated in January 2025 that this commitment has been suspended.[25] However, the IRM has retained its analysis as there is evidence the reform continues to be implemented.

Potential for results: Modest
This commitment aims to create an observatory for public projects and reforms through two pilot projects at the national and subnational levels. The national-level pilot focuses on waste management and the subnational one on public projects in the rural province of Jendouba. Waste management was chosen for its relevance to both rural and urban populations across multiple governorates as well as for waste management's impacts on society, economy, health, environment, and water use.

This reform specifically involves the (1) creation of a mechanism for collecting, producing, updating, and validating data related to public projects and reforms; (2) creation of a mechanism for generating data-based knowledge e.g., evidence-based and data-driven analysis; (3) development of a digital platform that allows data to be shared and processed by all parties; and (4) establishment and development of a space for exchange and collaboration. The observatory seeks to "strengthen partnerships with the government, the administration and the various stakeholders… [and] aim is to produce accurate, qualitative analyses and studies to support the development and monitoring of public policies."[26]

Prior to this commitment, Tunisia did not have a central platform for citizens to track public projects. Public authorities and ministries have published data separately to various degrees, but they are often outdated, not reusable, and/or do not share a common format.[27] A central portal promises to make it easier for information seekers, such as public authorities, researchers, or experts, to locate the data that they may need. The Promoting Open Data Cluster in this action plan can complement this commitment's objective, particularly through the Ministry of Environment's publication of waste management data. Combined access to information on public projects and related open data can support the establishment of informed public participation, discourse, and evaluation.

Data collection has already been completed at the time of writing and production of evidence-based analyses was underway. The digital platform for the Tunisian Observatory for Public Policy (*l'observatoire Tunisien des politiques publiques* or OTPP)[28] was launched during a public event

on 24 October 2024 with over 100 attendees from government agencies, civil society, and the private sector.[29] In November and December 2024, regional workshops in Kairouan, Mednine, Gafsa, Jendouba, and Nabeul created a space for exchange and collaboration, followed by a round table in Sousse as well as a waste management round table in Tunis.[30] These events sought to reach local CSOs outside of the capital so that they could advance public monitoring on issues of their choosing. To this end, these workshops focused on how to leverage both data use and the OTPP digital platform.[31]

The OTPP obtains data for publication via proactive and reactive disclosure from government sources. While public institutions are required to proactively publish information that has been requested with a positive decision,[32] the Access to Information Authority (INAI) does not have the enforcement authority to compel production of information or datasets generally, and it is unclear the extent to which government agencies comply with this provision. Commitment 5 in this plan has the potential to address this gap through the creation of an evaluation framework for INAI.

This commitment was identified as promising in light of its significant civil society involvement and focus on salient public policy issues i.e., waste management and rural development. The OTPP is actively prioritizing to work with gender-disaggregated data to aid in more meaningful impact evaluations of public projects it monitors.[33] Notable results of this commitment could include evidence of increased use by CSOs, the media, private sector, academia, and others, specifically on waste management topics or issues of regional salience in Jendouba, for participation in government decision-making and public debate, as well as in third-party evaluations of public projects beyond those designated as part of this commitment.

Opportunities, challenges, and recommendations during implementation
As a civil society-led commitment, one challenge that may arise is the sustainability beyond the implementation period. To that end, Solidar could:

- Continue **prioritizing consistent engagement with all stakeholders**, particularly those from government and the private sector.
- **Ensure an exit strategy of adoption by government** as an independent, public, or public-private data trust.
- Pending successful implementation in Jendouba, this commitment can be increased by **replicating and adapting the approach** as necessary in other underserved areas.
- Consider how the OTPP can **harness public participation to monitor the implementation of public projects**. For instance, the Nigerian state of Kaduna introduced an "eyes and ears" platform where citizens could provide feedback on the status of public projects being implemented in rural areas, where government oversight was difficult.[34] The Government of Nigeria then replicated this platform at the federal level, publishing information on large infrastructure projects and enabling the public to ask questions and upload comments and photos in support of monitoring efforts.[35]

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Commitments 6 and 7: Promoting Open Data Cluster [E-Government Unit of the Presidency and Ministry of Environment]

For a complete description, see Commitments 6 and 7 in [Tunisia 2023–2025 Action Plan](#).

Context and objectives
Open data reforms in Tunisia benefit from being prioritized by government (specifically the OGP Tunisia team) and civil society—underpinned by technical support from international partners. The issuance of the Circular No. 4 of 21 February 2024 on Open Data has further propelled progress as it clarified priorities and oriented the strategic direction of the work.[36] This decree extends previous efforts to strengthen the regulatory framework for open data, such as with Circular No. 3 of 2021 on Open Public Data.

This cluster builds on open data efforts in previous action plans.[37] An updated version of the national open data portal was launched in March 2023, while the process of inventorying priority data across ministries has been underway since the previous plan. In line with operationalizing Circular No. 4, this cluster encompasses all public structures at various administrative levels, including ministries and municipalities representing an increase in scope from its predecessor in the fourth NAP which focused on a few pilot ministries. Commitment 6 aims to increase use of open data while Commitment 7 focuses on strengthening the Ministry of Environment's open data publication.

Potential for results: Modest
Commitment 6 seeks to foster a more data literate, engaged user base so that data is used more effectively for public benefit.[38] The activities involve (1) taking inventory of existing data; (2) developing and launching a national strategy to tackle the under-utilization of data; and (3) developing a tailored monitoring and evaluation framework for the National Open Public Data Program and issuing a public report on its findings.

Despite ongoing efforts, the current status of public use of open data published by the government remains limited, with lacking publication of relevant data in consistent open formats being highlighted as obstacles to public use. Some categories of data have been identified as priorities for disclosure, although further prioritization is needed. For example, geographic data has been identified as beneficial for applications requiring geo-economic data; in turn aiding investment, start-ups, and public transportation services. Social data can assist researchers, academics, and civil society by simplifying their work. Similarly, data for journalists will be enhanced—facilitating visualization which makes information more accessible and useful.[39] Furthermore, via this website, information seekers can request the publication of specific data sets which could improve the relevance of published information to users' needs.

A civil society partner reported that the technical support for data inventory is in place and that there will be subsequent support for open data initiatives.[40] According to the E-Government Unit, a public data inventory management system was made available to government agencies in June 2022. By the end of 2023, the E-Government Unit reports that over 40 public entities registered on the system, who are in the process of identifying and inventorying data. Training sessions have been provided for ministries to inventory data and use the system, with public entities having identified around 296 data sets.[41]

As of July 2024, the national open data portal featured 2,493 datasets across 24 policy areas from 193 data producers. The greatest number of data sets were available related to agriculture and resources, local affairs, industry, mining and energy, and culture. No data sets were available under the areas of finance, family and women, justice and human rights, technology, foreign

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affairs and migration, and state property and land affairs. Users can request data, report examples of use-cases, or report a problem.[42] The site reports 239 registered users and highlights six examples of data use. Reuse cases include visualizations and tools created by the private sector related to transportation, by civil society platform consolidating open data, and by government agencies related to rainfall and dam operations.[43] The E-Government Unit and the Ministries of Health, Social Affairs, and Education also previously hosted the second OpenGovDataHack event in March 2023 to encourage creative use of open data.[44]

The Open Government Support Program in Francophone Developing Countries (PAGOF) organized knowledge exchange workshops, which generated discussions on challenges faced by data producers and the needs of (re)users, encompassing legal, technical, and other issues. This assisted in identifying the needs of data users, including think tanks, media, and civil society.[45] The material generated from the workshops were considered when developing the Circular No. 4 of 21 February 2024. Synthesized findings from the workshops resulted in six documents shared with stakeholders, serving as the foundational material for the strategy.

Commitment 7 seeks to advance the Ministry of Environment's open data practices and portal. This commitment's activities involve: (1) carrying out an inventory of ministry-held data or those held by structures that report to the ministry, (2) identifying priority data sets for publication, (3) developing a work plan for the ministry's data program, and (4) redesigning the ministry's open data portal. The aim of these activities is to gather and consolidate data and indicators that the ministry has been regularly sharing and publishing across disparate platforms and media so that information seekers can easily access reliable environmental data in one place.[46]

The Ministry of Environment's current portal for environmental information, launched in May 2017, features 42 data sets across seven policy areas from five data producers as of December 2024.[47] However, these only cover data up to 2019, mostly related to climate change, sustainable development, water resources, sanitation, quality of life, waste management, and counter-desertification. No data are available for agriculture, sea fishing, tourism, wetlands, coastline, anti-pollution mechanisms, health and the environment, and sustainable management of soil resources and agricultural land. The site provides the opportunity to request data, but it does not appear to report examples of use cases or allow users to report a problem.

At the time of writing, the ministry had made progress towards achieving milestones in the action plan, reporting that "the inventory of all data [the ministry] produced and collected was validated by NGOs."[48] Additionally, data sets have been extracted and enhanced, in line with open data protocol and guidelines, for publication. The workplan for the Open Data program, which was due to be developed by the end of December 2024, would propose the specific improvements to be made to the portal.[49] Among those anticipated, one of these will allow for ministry partners (including non-governmental ones) to propose or update data sets.[50]

A civil society representative highlighted that the Ministry of Environment stands out among other government structures in Tunisia for carrying out open data reforms, attesting they are "unique for doing this of their own initiative."[51] The ministry's extant international cooperation and agreements with agencies incentivize publication of easily accessible and reliable environmental data,[52] more specifically ones with "several donors e.g., UNDP, GIZ, UNEP, and GEF on environmental issues such as disasters, desertification, biodiversity, climate change, [...means that the Ministry is] therefore called upon to share and publish data relating to these issues."[53] The ministry has earmarked both financial and human resources for this reform[54] and received support from the E-Government Unit,[55] who has facilitated the involvement of stakeholders,

training sessions on how to conduct an inventory, and aiding in drafting the terms of reference for the ministry's internal workplan.[56]

This cluster has a modest potential to increase the availability and useability of open government data. The development and launch of a national strategy to promote data use can provide further direction and guidance on tackling a significant challenge that is fundamental to operationalizing the transparency potential inherent in open data reforms. The development of a tailored monitoring and evaluation framework, as well as the publication of a report based on its findings can generate knowledge on the state of the strategy's implementation. Notable results of this commitment could include evidence of increased use by civil society, the media, private sector, academia, and others of open data for participation in both government decision-making and public debate, as well as in third-party evaluations of public projects.

Opportunities, challenges, and recommendations during implementation
Reformers have undertaken a participatory approach in the initial stages of this commitment. Civil society expressed a desire for collaboration and communication to continue to ensure published data aligns with users' needs and priorities.[57] Communications can also ensure public awareness of the release of new data sets. Challenges to ministries' data publication include unclear legal framework that leads to concerns about breaching state secrecy rules and a lack of objective criteria for classifying levels of data sets. This highlights the opportunity to **continue educating ministries on their open data and right to information obligations**.

Limited financial and human resources risks resulting in uneven implementation where some ministries have designated administrative focal points, but many others have not.[58] One staff member in the E-Government Unit is responsible for the open data portfolio across several ministries, constraining cross-government coordination. The E-Government Unit and partners could **prioritize efforts that align with users' data demands** and where agencies have some infrastructure in place to facilitate data disclosure. This may generate lessons learned to inform implementation in other agencies.

Commitments 8 and 9: Open Municipal Government Cluster. [E-Government Unit of the Presidency, Ministry of Interior, Ministry of Youth and Sport, and Exercise Your Right Association]

For a complete description, see Commitments 8 and 9 in Tunisia 2023–2025 Action Plan.

Context and objectives
Tunisia has advanced open government at the municipal level across action plans. Previous commitments have led to the development of municipal open government plans as well as youth action plans.[59] These reforms are continued in this action plan under the leadership of the E-Government Unit and civil society partners with support from the German Corporation for International Cooperation (GIZ). Commitment 8 seeks to select and support ten additional municipalities in the development of open government action plans. Commitment 9 aims to support youth and women collaboration at the municipal level to identify and implement local development projects. The explicit focus on women in Commitment 9 marks the first time that Tunisia has incorporated considerations for gender in its OGP action plans.

Opening government at the municipal level has the potential to improve relations between citizens and the state, as the public most often interacts with and receives services from local government. Commitment 9 specifically seeks to engage youth, who have historically had limited opportunities to participate in government decision-making. Despite some recent progress,

Tunisian women continue to face social, political, and economic barriers.[60] Expanding women's civic participation is an especially salient issue following the 2022 Constitutional amendments that removed provisions for equal gender representation.[61] Commitments 8 and 9 offer tangible, albeit modest, opportunities for civic participation in a few of Tunisia's 350 municipalities.

Potential for results: Modest

This cluster aims to expand open government processes at the municipal government as well as empower youth and women in the design and monitoring of public projects at the local level. This commitment cluster is designed to expand previous efforts by (1) organizing a workshop to gather feedback on the experiences of municipalities that participated in the previous action plan; (2) selecting ten municipalities to develop open government action plans; and (3) targeting five municipalities to support the co-creation of projects with women and youth.[62]

Under previous action plan cycles, the municipalities of Carthage, Hammam Chott, Dar Chaabane, Zaouiet Sousse, Zriba, Regueb, Souassi, and Gabès were selected and supported to develop their open government action plans.[63] During the fourth action plan, 12 municipalities (Hammam Chott, Gabès, Dar Chaabane, Zriba, Zaouiet sousse, Carthage, Métlaoui, Sidi Bou Rouis, Téboursouk, Ghezala, Enfidha, and Bechri Fatnassa Nagga) were selected and supported to develop youth action plans. These commitments contributed to the municipalities of Regueb, Carthage, Zriba, El Kef, and Dar Chaabane El Fehri in becoming members of OGP Local.[64]

As of July 2024, selection criteria for municipalities remained officially undefined and subject to agreement between the E-Government Unit, GIZ, and the relevant sub-agencies of the Ministry of Interior. Preliminary criteria include geographic diversity, an understanding of open government principles, demonstrated willingness to work in a participatory approach, IT infrastructure, and an understanding of digital transformation principles.[65] An E-Government Unit representative noted that municipalities selected under Commitments 8 and 9 may overlap although that will not be an intentional aim.[66] This is similar to the previous action plan and indicates a balance between breadth of participation and depth of support to municipalities.

This cluster has a modest potential to continue advancing civic participation at the municipal level, particularly among marginalized groups. GIZ has continued to provide consistent and financial technical support to the projects and municipalities. Their partnership with the E-Government Unit has proven to be a robust one, built on longstanding cooperation. Civil society partners were also highlighted as a stabilizing force in the context of local governance changes due to their agility, collaborative approach in adapting to rapidly changing circumstances, as well as significant expertise and in-depth local knowledge.[67]

Evidence of notable early results would include a greater number of youth and women participating in policymaking, particularly young women. This should result in the identification and implementation of reforms deemed important to young Tunisians. Evidence of results would also include indication that implementation of municipal action plans has institutionalized greater transparency, accountability, or participation in municipal governments. An increase in the number of municipalities applying to, and being admitted to, the OGP Local cohort could also indicate notable early results. In the long-term, consolidating open government at the municipal level offers the opportunity to bring open government closer to citizens and improve public service delivery, which is particularly relevant in the context of administrative decentralization where municipalities have been assuming key public services.[68]

Opportunities, challenges, and recommendations during implementation[69]

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Key to this commitment cluster realizing its potential is the consistent engagement and technical support from the Government of Tunisia and partners to municipalities undertaking reforms. Administrative reorganization—including the dissolution of municipal councils until new elections and the emergence of new local governance structures—has presented a challenge for project partners.[70] One civil society representative reports that "the effects of this change are still being felt, requiring continuous adaptation and learning to collaborate within the framework of participatory governance initiatives."[71] This is particularly salient given that the competencies of the municipal councils and the new local councils remain undefined.[72]

The E-Government Unit and GIZ are encouraged to **continue investing in capacity and relationship building**. These are crucial to sustaining momentum for reforms in a challenging operating context as well as to be able to identify potential problems in advance and thus formulate solutions, especially in light of local councils' limited financial and human resources. The IRM recommends that project partners **prioritize the institutionalization of women and youth participation on the local level** so that these structures last beyond the conclusion of GIZ's funding and the E-Government Unit's coordination.

Other commitments
Other commitments that the IRM did not identify as promising are discussed below. This review provides recommendations to contribute to the learning and implementation of these commitments. Lack of open government lens (Commitments 2, 3, 11, and 12) and low potential for results (Commitments 5, 10, 13, and 15)—especially in the current Tunisian context—are the two primary characteristics of commitments to be identified as not promising.

Commitment 5 to strengthen proactive information disclosure augments similar efforts in previous action plans.[73] Civil society organizations proposed this commitment to address the prevailing perception among government officials that improving access to information practices only means improving reactive disclosure.[74] Thus, this commitment seeks to enhance the Access to Information Authority's (INAI) monitoring and enforcement of proactive disclosure requirements. It aims to apply a methodology and electronic system to determine the extent of government agencies' compliance with extant requirements for proactive disclosure. While this commitment has a modest potential for results, its ambition is limited to developing INAI's evaluation framework. These milestones do not directly increase access to information for the Tunisian public as currently written. If the reform included activities that use the evaluation results to enforce proactive disclosure requirements, this reform's ambition could be increased.

Commitments 10 and 13 were designed to advance civic participation. Commitment 10 seeks to strengthen digital civic participation tools such as the e-participation.tn and e-people.gov.tn platforms. Commitment 13 seeks to compile a guide for CSOs on regulations and compliance with taxation, social security, and other frameworks. Despite positive aims, these commitments have an unclear potential for results given a broader context of closing civic space and backsliding in freedoms of association and expression.[75] Resultantly, the milestones are unlikely to achieve their aims to advance civic participation within a challenging wider context.[76] Tunisian open government reformers can strategically consider possible activities to protect the freedoms of assembly, association, and expression as well as work towards rectifying Tunisia's score in the OGP values check.[77] Such activities could seek to limit unjustified interference in CSO operations, ensure continued access to domestic and international funding, and uphold freedom of expression for civil society and the media, including in the online space.[78]

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Four commitments (2, 3, 11, and 14) lack a strong open government lens as currently written. The focus on water management and governance in Commitments 2 and 3 is laudable given that it is a salient national issue. However, it can be made more relevant, for example, by including activities that publish information on water management of interest to the public or activities that create channels for civil society to engage in water governance. Commitments 11 and 12 combat corruption and promote integrity in the public sector through activities that focus primarily, if not exclusively, on internal government processes. Positively, there is an intention for training modules on anti-corruption and integrity to also be provided to civil society, including the media and public sector.[79] If implementation enables the public to better hold government to account by reporting suspected corruption cases, this reform may prove relevant to open government.

[1] See "Publication of Budget Reports" in: "Tunisia, First Action Plan, 2014–16," *Government of Tunisia*, 23 October 2015, https://www.opengovpartnership.org/documents/tunisia-first-action-plan-2014-16; "Promoting Financial and Fiscal Transparency" in: "Tunisia Second National Action Plan 2016–2018," *Government of Tunisia*, 1 November 2016, https://www.opengovpartnership.org/documents/tunisia-second-national-action-plan-2016-2018; "Participatory Budgeting" in: "Tunisia Action Plan 2018–2020," *Government of Tunisia*, 26 November 2018, https://www.opengovpartnership.org/documents/tunisia-action-plan-2018-2020; "Entrenching Financial Transparency" in: "Tunisia Action Plan 2021–2023," *Government of Tunisia*, 6 August 2021, https://www.opengovpartnership.org/documents/tunisia-action-plan-2021-2023.

[2] "Engagement 4 : Consacrer la transparence financière," *Government of Tunisia*, 14 October 2021, http://www.ogptunisie.gov.tn/fr/index.php/2021/10/14/engagement-4-consacrer-la-transparence-financiere.

[3] International organization representative, correspondence with IRM researcher, 20 August 2024.

[4] "2024 OGP Eligibility Scores - Public," *Open Government Partnership*, 3 July 2024, https://docs.google.com/spreadsheets/d/1xOIX3xGcwHYnjY5lG1ceV6f9Rtj6JwmMa5x8e41WB0I/edit.

[5] Promulgation of the Organic Budget Law 2019 No. 15 was part of participatory budgeting commitment in the third action plan, see: "Tunisia Action Plan 2021–2020," *Government of Tunisia*.

[6] See Article 46 in: "Organic Budget Law 2019 No. 15," *Government of Tunisia*, 13 February 2019, https://legislation-securite.tn/latest-laws/loi-organique-n-2019-15-du-13-fevrier-2019-relative-a-la-loi-organique-du-budget, which include: A state budget report, Overall medium-term budget framework and its sectoral breakdown, Overall balance of the state budget, Budget financing operations table, Explanatory notes detailing expenditure for each mission by type, program, and sub-program, Annual performance projects by mission for the budget year, State transfers to public enterprises and non-administrative public establishments, Public debt report, Report on public enterprises, Report on the activity of special funds, Report on the regional distribution of investment, Report on tax expenditure and financial benefits granted, and Report on investment projects carried out under partnership contracts with the private sector.

[7] Aicha Karafi, "Tunisia presents its open budget project: Mizaniatouna (Our Budget)," *World Bank*, 23 December 2015, https://blogs.worldbank.org/en/arabvoices/tunisia-open-budget-portal.

[8] Government representative, interview by IRM researcher, 22 May 2024.

[9] Government representative, interview, 22 May.

[10] Government representative, interview, 22 May.

[11] Government representative, interview, 22 May.

[12] Civil society representative, correspondence with IRM researcher, 18 June 2024.

[13] "Tunisia: Open Budget Survey 2021," *International Budget Partnership*, 2021, https://internationalbudget.org/sites/default/files/country-surveys-pdfs/2021/open-budget-survey-tunisia-2021-en.pdf; "Résultat de la recherche pour 'budget citoyen'," *Ministry of Finance*, http://www.finances.gov.tn/fr/search/node?keys=budget%20citoyen&page=0.

[14] Civil society representative, correspondence, 18 June.

[15] Civil society representative, correspondence, 18 June.

[16] Government representative, interview, 22 May.

[17] Civil society representative, correspondence with IRM researcher, 20 May 2024; Civil society representative, correspondence with IRM researcher, 23 May 2024; Civil society representative, correspondence with IRM researcher, 28 May 2024.

[18] "New draft law threatens freedom of association," *Civicus*, 2 December 2023, https://monitor.civicus.org/explore/new-draft-law-threatens-freedom-of-association; "Tunisia's escalating crackdown: Anti-racism and migrants' rights activism under attack," *Civicus*, 23 May 2024, https://lens.civicus.org/tunisias-escalating-crackdown.

[19] "Open Budget Survey 2019: Questionnaire Tunisia," *International Budget Partnership*, April 2020, https://internationalbudget.org/sites/default/files/2020-05/tunisia-202002150030.pdf.

[20] Government representative, interview, 22 May.

[21] Civil society representative, correspondence, 18 June.
[22] "Opportunities for coordinating the integration of gender and climate change into budgeting and finance," *Collaborative Africa Budget Reform Initiative*, 2021, https://www.cabri-sbo.org/en/publications/opportunities-for-coordinating-the-integration-of-gender-and-climate-change-into-budgeting-and-finance.
[23] Mayssem Marzouki, "Reforming Tunisia's Municipal Waste Management: Challenges and potential solutions," *Houloul*, 16 May 2023, https://houloul.org/en/2023/05/16/reforming-tunisias-municipal-waste-management-challenges-and-potential-solutions.
[24] Civil society representative, interview by IRM researcher, 19 June 2024.
[25] Information provided by the Government of Tunisia to the IRM during the public comment period for this report. January 2025.
[26] "L'observatoire Tunisien des politiques publiques voit le jour," *L'Économiste Maghrébin*, 21 October 2024, https://www.leconomistemaghrebin.com/2024/10/21/lobservatoire-tunisien-des-politiques-publiques-voit-le-jour.
[27] "Tunisia Action Plan 2023–2025," *Government of Tunisia*, December 2023, https://www.opengovpartnership.org/documents/tunisia-action-plan-2023-2025-december.
[28] "Quis Sommes Nous," *Observatoire Tunisien des Politiques Publiques*, https://otpp.tn.
[29] Nizar Hajbi, "Lancement officiel de l'observatoire Tunisien des politiques publiques : Renforcer la confiance des citoyens dans l'administration," *La Presse*, 24 October 2024, https://lapresse.tn/2024/10/24/lancement-officiel-de-lobservatoire-tunisien-des-politiques-publiques-renforcer-la-confiance-des-citoyens-dans-ladministration; Civil society representative, pre-publication review comment, 3 November 2024.
[30] Civil society representative, pre-publication review comment.
[31] Civil society representative, interview, 19 June.
[32] "The protection and promotion of civic space: Strengthening alignment with international standards and guidance," *Organization for Economic Co-operation and Development*, 16 December 2022, https://doi.org/10.1787/d234e975-en, 140.
[33] Civil society representative, interview, 19 June.
[34] Stephanie Bluma, Aidan Eyakuze, and Saied Tafida, "When a government's eyes and years improve public infrastructure projects," *Voices of Open Government*, 1 November 2021, https://www.opengovpartnership.org/stories/when-a-governments-eyes-and-ears-improve-public-services.
[35] "Tracka," *Government of Nigeria*, accessed 20 December 2024, https://tracka.ng.
[36] Civil society representative, correspondence, 23 May.
[37] See commitments on developing an open data portal as well as an open data platform dedicated to information dealing with oil and mine sector investment in: "Tunisia, First Action Plan, 2014–16," *Government of Tunisia*; commitments on the completion of the legal and regulatory framework of open data at the national level, open data framework, and open transport data in: "Tunisia Action Plan 2018–2020," *Government of Tunisia*; commitments on enhancing public data openness, promoting the reuse of public data, and improving public data accessibility through defining common specifications and nomenclature in: "Tunisia Action Plan 2021–2023," *Government of Tunisia*.
[38] "IRM Results Report: Tunisia 2021–2023," *Open Government Partnership*, 21 October 2024, https://www.opengovpartnership.org/documents/tunisia-results-report-2021-2023.
[39] Civil society representative, interview by IRM researcher, 20 May 2024.
[40] Civil society representative, interview, 20 May.
[41] "IRM Results Report: Tunisia 2021–2023," *Open Government Partnership*.
[42] "Plateforme Nationale des Données Ouvertes," *Government of Tunisia*, https://www.data.gov.tn/fr.
[43] "Réutilisations des données," *Government of Tunisia*, https://www.data.gov.tn/fr/reutilisations-de-donnees.
[44] "Organisation de la 2ème édition du Hackathon national 'OpenGovDataHack2023' sur la réutilisation des données publiques ouvertes," *Government of Tunisia*, 19 March 2023, https://www.data.gov.tn/fr/actualit%C3%A9s/organisation-de-la-2%C3%A8me-%C3%A9dition-du-hackathon-national-opengovdatahack2023-sur-la-r%C3%A9utilisation-des-donn%C3%A9es-publiques-ouvertes.
[45] Civil society representative, interview, 20 May.
[46] Government official, correspondence with IRM researcher, 2 December 2024.
[47] "Open Data" Ministry of Environment of the Government of Tunisia, (n.d.), https://opendata.biaa.tn/
[48] Government official, correspondence, 2 December.
[49] Government official, correspondence, 2 December.
[50] Government official, correspondence, 2 December.
[51] Civil society representative, interview, 20 May.
[52] Civil society representative, interview, 20 May.
[53] Government official, correspondence, 2 December.
[54] Government official, interview by IRM researcher, 10 July 2024.
[55] Government official, interview, 10 July.
[56] Government official, interview, 10 July.

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[57] Civil society representative, interview, 20 May.
[58] Civil society representative, interview by IRM researcher, 23 May 2024.
[59] See commitments on improving the transparency and openness of local government and developing new mechanisms to promote interaction with the youth and enable them to pursue dialogue about public policies in: "Tunisia Second National Action Plan 2016–2018," *Government of Tunisia*; commitments on implementing initiatives to apply the OGP at the local level and youth participation in: "Tunisia Action Plan 2018–2020," *Government of Tunisia*; commitments on supporting financial transparency at the local level, entrenching OGP principles at the local level, and enhancing the role of youth in designing and monitoring public projects at the local level in: "Tunisia Action Plan 2021–2023," *Government of Tunisia*.
[60] "Tunisia Gender Landscape," *World Bank*, 1 April 2024,
http://documents.worldbank.org/curated/en/099926407032239255/IDU1353468e31c8ad14bcc1827b17dc9b778b9b3.
[61] Rihab Boukhayatia, "Tunisie : Tollé féministe contre la loi électorale," *Nawaat*, 12 October 2022,
https://nawaat.org/2022/10/12/tunisie-tolle-feministe-contre-la-loi-electorale.
[62] Government official, interview by IRM researcher, 17 May 2024.
[63] "Commitment 11: Insure the OGP at the local level," *Government of Tunisia*, http://www.ogptunisie.gov.tn/en/?p=1329.
[64] "55 Local Governments Join International Partnership on Open Government," *Open Government Partnership*, 16 April 2024, https://www.opengovpartnership.org/news/55-local-governments-join-international-partnership-on-open-government; "IRM Results Report: Tunisia 2021–2023," *Open Government Partnership*.
[65] Government official, interview, 10 July.
[66] Government official, interview, 10 July.
[67] Civil society representative, interview by IRM researcher, 3 June 2024.
[68] One such example of this is solid waste management, on which "Tunisia's experience of decentralized waste management started in 2018, when municipalities assumed responsibility for waste collection. The decentralization process has revealed several benefits […] However, the incomplete implementation of decentralization processes leaves municipalities highly dependent on financial support from the central state, which is often insufficient, and transfers of equipment, some of which are ill-suited to the needs of local communities." For more information, see: Wassim Chaabane, "Decentralized Waste Management in MENA Countries: Lessons from Tunisia," *Center for Strategic and International Studies*, 6 May 2021, https://www.csis.org/analysis/decentralized-waste-management-mena-countries-lessons-tunisia.
[69] The IRM was unable to establish contact with the civil servant focal point for Commitment 8 at the Ministry of Interior, whom the IRM contacted twice via email on 14 and 21 May 2024. The IRM requested assistance from the OGP Tunisia team in facilitating contact on 29 May 2024, who confirmed receipt on 30 May 2024. No phone number information is available on the website of the Ministry of Interior.
[70] "Decree No. 589," *Government of Tunisia*, 21 September 2023, www.iort.gov.tn; "Tunisie : Les élections municipales auront bien lieu selon Bouasker," *La Presse*, 1 December 2024, https://lapresse.tn/2024/12/01/les-elections-municipales-auront-bien-lieu-selon-bouasker.
[71] Civil society representative, interview, 3 June.
[72] "Quelles sont les vraies prérogatives des conseils locaux?" *L'Économiste Maghrébin*, 31 December 2023, https://www.leconomistemaghrebin.com/2023/12/31/tunisie-quelles-sont-les-vraies-prerogatives-des-conseils-locaux; "Action municipale : Entre le marteau de la loi et l'enclume des citoyens," *La Presse*, 5 September 2024,
[73] These include completing the regulatory framework to consecrate access to information right (2021), right to Information (2018), and modernizing the regulatory framework to enforce the right to access to information (2016).
[74] Civil society representative, interview by IRM researcher, 4 June 2024.
[75] "New draft law threatens freedom of association," *Civicus*; "Tunisia: President's Power Grab Tramples Democracy and Rule of Law," *Freedom House*, 30 September 2021, https://freedomhouse.org/article/tunisia-presidents-power-grab-tramples-democracy-and-rule-law; "Tunisia: Saïed's draft Constitution is an assault on checks and balances, political pluralism," *Freedom House*, 22 July 2022, https://freedomhouse.org/article/tunisia-saieds-draft-constitution-assault-checks-and-balances-political-pluralism; "Draft Law 27 of 2023," *Parliament of Tunisia*, https://www.arp.tn/en_US/loi/project/3957.
[76] "Crackdown on critics and journalists as President Saïed cements his power grab," *Civicus*, 13 March 2024, https://monitor.civicus.org/explore/crackdown-on-critics-and-journalists-as-president-sa%C3%AFed-cements-his-power-grab.
[77] "2024 OGP Eligibility Scores - Public," *Open Government Partnership*.
[78] "New draft law threatens freedom of association," *Civicus*; "Tunisia: Repressive crackdown on civil society organizations following months of escalating violence against migrants and refugees," *Amnesty International*, 16 May 2024, https://www.amnesty.org/en/latest/news/2024/05/tunisia-repressive-crackdown-on-civil-society-organizations-following-months-of-escalating-violence-against-migrants-and-refugees.
[79] Civil society representative, interview, 20 May.

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Section III. Methodology and IRM Indicators

The purpose of this review is not an evaluation. It is intended as a quick, 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 three 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.
- **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 follows a filtering and clustering process to identify promising reforms or commitments:

Step 1: Determine what is reviewable based on the underline verifiability of the commitment as written in the action plan.
Step 2: Determine if the commitment has an underline open government lens. Is it relevant to OGP values?
Step 3: Review commitments that are verifiable and have an open government lens to identify if certain commitments need to be clustered. Commitments that have a common policy objective or contribute to the same reform or policy issue should be clustered. The potential for results of clustered commitments should be reviewed as a whole. IRM staff follow these steps to cluster commitments:
   a. Determine overarching themes. If the action plan is not already grouped by themes, IRM staff may use OGP's thematic tagging as reference.
   b. Review commitment objectives to identify commitments that address the same policy issue or contribute to the same broader policy or government reform.
   c. Organize commitments into clusters as needed. Commitments may already be organized in the action plan under specific policy or government reforms.
Step 4: Assess the underline potential for results of the clustered or standalone commitment.

Filtering is an internal process. Data for individual commitments is available in Annex 1. In addition, 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).

As described earlier, IRM relies on three key indicators for this review:

I. Verifiability
- Yes, specific enough to review: As written in the action plan, the stated objectives and proposed actions are sufficiently clear and include objectively verifiable activities to assess implementation.

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- No, not specific enough to review: As written in the action plan, the stated objectives and proposed actions lack clarity and do not include explicitly verifiable activities to assess implementation.
- Commitments that are not verifiable will be considered not reviewable, and further assessment will not be carried out.

II. Open government lens
This indicator 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 by responding to the following guiding questions. Based on a close reading of the commitment text, the IRM first determines whether the commitment has an open government lens:

- 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 IRM uses the OGP values as defined in the Articles of Governance. In addition, 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 or influence decisions? Will the government create, enable, or improve participatory mechanisms for minorities or underrepresented groups? Will the government enable a legal environment to guarantee freedoms of assembly, association, and peaceful protest?
- 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?

III. Potential for results
The IRM adjusted this indicator—formerly known as the "potential impact" indicator—to take into account the feedback from the IRM Refresh consultation process with the OGP community. With the new results-oriented strategic focus of IRM products, the IRM modified this indicator to lay out the expected results and potential that would be verified in the IRM Results Report after implementation. Given the purpose of this Action Plan Review, the assessment of potential for results is only an early indication of the possibility the commitment has 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 scale of the indicator is defined 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.

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- **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 was prepared by the IRM in collaboration with Hana Murr who provided research and writing services and Sabrina Nassih who assisted with the research process. This review was reviewed by an external expert. 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.[1]

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[1] "Independent Reporting Mechanism," *Open Government Partnership*, https://www.opengovpartnership.org/irm-guidance-overview.

Annex 1. Commitment Data[1]

Commitment 1: Promote Financial Transparency

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

Commitment 2: Fee Payment System for Water Usage

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

Commitment 3: Application Management System for Water Usage Licenses

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

Commitment 4: Enhancing Transparency of Public Projects

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

Commitment 5: Enhancing Automatic/Proactive Publication of Information

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

Commitment 6: Strengthening Open Data Practices

- Verifiable: Yes
- Does it have an open government lens? Yes
- Commitments 6 and 7 are clustered under: Promoting Open Data
- Potential for results: Modest

Commitment 7: Promoting the Publication of Environmental Data

- Verifiable: Yes
- Does it have an open government lens? Yes
- Commitments 6 and 7 are clustered under: Promoting Open Data
- Potential for results: Modest

Commitment 8: Promoting Open Government at the Local Level

- Verifiable: Yes
- Does it have an open government lens? Yes
- Commitments 8 and 9 are clustered: Municipal Open Government
- Potential for results: Modest

Commitment 9: Promoting the Participation of Women and Youth at the Local Level

- Verifiable: Yes
- Does it have an open government lens? Yes
- Commitments 8 and 9 are clustered: Municipal Open Government
- Potential for results: Modest

Commitment 10: Enhancing the Use of Digital Participation Mechanisms

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Unclear

Commitment 11: Enhancing Public Sector Integrity via Corruption Risk Management Methodology

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

Commitment 12: Development of Integrity & Anticorruption Training Modules for Civil Servants

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

Commitment 13: Strengthening Associations Governance for Civic Space Development

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Unclear

Commitment 14: Digitalization of Administrative Services for Investors

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

Commitment 15: Enhancing Access to Information on Public Websites for People with Disabilities

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

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[1] **Editorial notes**:
1. For commitments that are clustered, the assessment of potential for results is conducted at the cluster level, rather than the individual commitments.
2. Commitment short titles may have been edited for brevity. For the complete text of commitments, see: "Tunisia Action Plan 2023–2025," *Government of Tunisia*, December 2023, https://www.opengovpartnership.org/documents/tunisia-action-plan-2023-2025-december.

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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.[1] 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.[2] 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?
1.1 Space for dialogue: Tunisia's OGP Steering Committee is comprised of ten government and civil society representatives each.[3] They met four times between April 2023 and November 2023.[4] Basic information about the steering committee's mandate and operation is available on the OGP Tunisia website.	Yes	*To be assessed in the Results Report*
2.1 OGP website: Tunisia maintains a website dedicated to its participation in OGP which features all five national action plans.[5]	Yes	*To be assessed in the Results Report*
2.2 Repository: A repository is available on the OGP Tunisia website, which is updated regularly. Information of the co-creation processes[6] as well as implementation of past[7] and current action plans[8] are available on the repository.	Yes	*To be assessed in the Results Report*
3.1 Advanced notice: The plan to develop the action plan was presented at an official launch on 8 February 2023. The public were invited to provide input on the e-participation.tn platform from 8 February to 31 March, with an extension to 9 May 2023.[9]	Yes	Not applicable
3.2 Outreach: Several outreach events, in and outside of the capital, were organized during the co-creation process[10] in addition to the launch on 8 February 2023.[11]	Yes	Not applicable
3.3 Feedback mechanism: Tunisia utilized its digital participation portal to gather inputs from a range of stakeholders. The submission period was initially open for seven weeks before it was extended for another five weeks.[12]	Yes	Not applicable
4.1 Reasoned response: Contributions from stakeholders were documented.[13] While the government did not publish written feedback to stakeholders on how their contributions were considered during development of the action plan,[14] proposals were discussed in the Steering Committee.[15]	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	*To be assessed in the Results Report*

Open Government Partnership

Independent Reporting Mechanism

The E-Government Unit oversees an established participatory and transparent OGP process. However, there remains opportunity to further strengthen transparency in the OGP Advisory Committee operations. The committee could develop a handbook that outlines its mandate, selection process, and decision-making processes.[16] Specific suggestions for the by-laws include each implementing ministry appointing an official representative and a substitute and specifying a maximum number of absences from committee meetings before being replaced.[17] For example, Morocco's OGP Handbook details procedures regarding meetings, shared roles and responsibilities for members—as well procedures specific to those from public administration and civil society in addition to guidance for public communication.[18]

The OGP Tunisia team has laudably documented many activities comprising the co-creation timeline. To comply with the minimum requirements more fully, the Tunisia OGP team can publish the co-creation timeline, information on opportunities to participate, and details on the decision-making process at least two weeks in advance of the first consultation. To further strengthen feedback processes, the committee could publish a report on feedback gathered at consultations, including what was incorporated into the action plan and why. The report could contain information on the number and type of participants, with the similar level of detail as used in documenting the committee meeting minutes.

[1] "OGP Participation and Co-Creation Standards," *Open Government Partnership*, 2021, 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] "Tunisia Action Plan 2023–2025," *Government of Tunisia*, December 2023, https://www.opengovpartnership.org/documents/tunisia-action-plan-2023-2025-december.

[4] "Meeting Minutes," *Government of Tunisia*, http://www.ogptunisie.gov.tn/?cat=91.

[5] "National Action Plans," *Government of Tunisia*, http://www.ogptunisie.gov.tn/fr/index.php/category/plans-daction-nationaux.

[6] "Extension of the deadline for the expanded national consultation on the proposed reforms as part of the fifth national action plan of the Open Government Partnership," *Government of Tunisia*, http://www.ogptunisie.gov.tn/?p=6014.

[7] For the fourth action plan, see: "Follow-Up Plan Implementation," *Government of Tunisia*, http://www.ogptunisie.gov.tn/en/?cat=59; for the third action plan, see: "Suivi de la Mise en Œuvre du Plan d'Action 2018–2020," *Government of Tunisia*, http://www.ogptunisie.gov.tn/fr/index.php/category/plans-daction-nationaux/plan-daction-2018-2020/suivi-de-la-mise-en-oeuvre-du-plan-daction-plan-daction-2018-2020; for the second action plan, see "Suivi de la Mise en Œuvré du Plan d'Action 2016–2018," *Government of Tunisia*, http://www.ogptunisie.gov.tn/fr/index.php/category/plans-daction-nationaux/plan-daction-2016-2018/suivi-de-la-mise-en-oeuvre-du-plan-daction.

[8] "Workshop on the National Open Data Program," *Government of Tunisia*, http://www.ogptunisie.gov.tn/en/?p=3425.

[8] "Expanded National Consultation on Proposed Reforms as part of the Fifth National Action Plan for the Open Government Partnership 2023–2025," *Government of Tunisia*, 9 January 2024, http://www.ogptunisie.gov.tn/?p=5758.

[9] "Expanded National Consultation on Proposed Reforms as part of the Fifth National Action Plan for the Open Government Partnership 2023–2025," *Government of Tunisia*.

[10] "Tunisia Action Plan 2023–2025," *Government of Tunisia*.

[11] "Expanded National Consultation on Proposed Reforms as part of the Fifth National Action Plan for the Open Government Partnership 2023–2025," *Government of Tunisia*.

[12] "Expanded National Consultation on Proposed Reforms as part of the Fifth National Action Plan for the Open Government Partnership 2023-2025," *Government of Tunisia*.

[13] "Tunisia Action Plan 2023–2025," *Government of Tunisia*.

[14] Government official, interview by IRM researcher, 17 May 2024.

[15] "Meeting Minutes," *Government of Tunisia*.

[16] "Tunisia Co-Creation Brief 2023," *Open Government Partnership*, 16 February 2023, https://www.opengovpartnership.org/documents/tunisia-co-creation-brief-2023.

[17] Civil society representative, interview by IRM researcher, 28 May 2024.

[18] "Manuel du Comité de Pilotage," *Government of Morocco*, 27 June 2022.

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