From National Exception to World Society Norm – Freedom of Information and the Dynamics of Transnational Communities

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Transparency is a key structuring norm underlying contemporary polities and economies, not only in the West, but increasingly throughout the world (Garsten & De Montoya, 2008; Hood & Heald, 2006). The term itself, which was rarely found before the 1970s is now used across the board and associated with competing and conflicting notions – from the idea of state transparency for the public, to market transparency for investors, or even individual transparency for political, economic or security purposes (Mehrpouya & Djelic, 2012). As a result, ‘transparency’ is a chameleon term and an empty signifier in political discourse (Laclau, 1996).

Democratic transparency, rooted in enlightenment thought, is one of the dominant contemporary transparency templates. A founding project of the enlightenment was to open up political and social hierarchies to the scrutiny of emancipated citizens (J. W. Meyer, 1990). Power holders had to open themselves to scrutiny, to be broadly speaking accountable to a mobilized and responsible citizen. The availability of information, in that context, particularly through the broad principle of openness and publicity was seen as an important precondition for liberation and democratic self-direction (Outram, 1995).

The first institutionalization of democratic transparency, through the legal inscription of the “principle of publicity”, took place at the national level, in 18th century Sweden.1 In 1766, the Kingdom of Sweden adopted the first freedom of information (FOI) law and infused, in its legal and political tradition, a principle of openness or public access – Offentlighetsprincipen (ACF, 2012). Legalization of freedom of information however stayed limited to Sweden up until the 1960s. Since the 1960s, FOI laws have spread like wildfire and now they can be found in about 90 countries

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1 At that time the Kindgom of Sweden covered the territories of contemporary Sweden, Finland and parts of the Baltic States.
across most regions of the world – with the notable exception of the Middle East and Sub-Saharan Africa (Ackerman & Sandoval-Ballesteros, 2006; Michener 2011). In general, FOI laws give citizens, residents and interested parties the right to access documents produced and held by a government without being obliged to demonstrate any legal interest or “standing” (Ackerman & Sandoval-Ballesteros, 2006: 6), wherein public access to government workings and outcomes is the rule rather than the exception. This diffusion process has had significant and sometimes unintended consequences in many countries (Roberts, 2000).

In parallel to the rapid spread of FOI laws across many different national jurisdictions, freedom of information has become, over the last decade or so, a transnational issue. A dense and complex transnational ecosystem has emerged around the principle of openness and transparency and its progress. This web of individual and organizational champions have turned “freedom of information” into a transnational movement. Together, they frame the language, templates, political and resource structures, which foster the circulation and parallel adoption (and sometimes implementation) of FOI laws across the world.

With this paper, we want to explore the structuration of this transnational architecture that enables and fosters the global diffusion and widespread adoption of FOI laws. In this case as in many others, transnational communities play a significant role in shaping, carrying and inscribing norms, rules and regulations with a transnational scope and ambition. While we follow, as a first step, the diffusion paths and patterns of FOI laws from the 1960s onwards, we are more particularly interested in the progressive constitution of a “transnational community” (M. L. Djelic & Quack, 2010) around democratic transparency and FOI laws. This paper will focus on the mechanisms through which this community is being built, expanded, sustained and tightened through time.

Transnational Communities and their Role in Transnational Governance

The past few decades have seen the striking progress of transnational dynamics when it comes to the structuring of our economic, social, legal and even cultural lives (Büthe & Mattli, 2011; M. L. Djelic & Sahlin-Andersson, 2006; Krücken & Drori, 2009; Levi-Faur & Jordana, 2005). Those transnational dynamics are in close and
tight interpenetration with national and local structures and logics. The interplay is much more than a simple juxtaposition of layers, though. In fact, transnational dynamics may come to “inhabit” the local in the words of Saskia Sassen (Sassen, 2000), to colonize the national from inside as it were. As Meyer and colleagues convincingly argue (J. W. Meyer, Boli, Thomas, & Ramirez, 1997, pp. 144–145):

“Many features of the contemporary nation-state derive from worldwide models constructed and propagated through global cultural and associational processes. These models and the purposes they reflect…are highly rationalized, articulated and often surprisingly consensual”

World Models and their Localized Inscription

On an experiential basis, many of us feel the impact of these world models, of this “world society” on most dimensions of our daily lives. Education, health protocols, firms and economic organization in general, state administration, cultural products, even social and ethical norms often reflect, in the way we experience them, broad cognitive and normative patterns with a transnational scope. In education, we have the Bologna process, in health we have (amongst many other things) evidence-based medicine, in state administration we have New Public Management. And we could go on. These worldwide models hence have significant local impact (J. W. Meyer et al., 1997, p. 145):

“(They) define and legitimate agendas for local action, shaping the structures and policies of nation-states and other national and local actors in virtually all of the domains of rationalized social life—business, politics, education, medicine, science, even the family and religion.”

Claiming that world models have local impact does not mean that the world is becoming slowly but surely ever more homogeneous. First, these models are likely to have impact even if and when they remain shallow and are not locally appropriated and/or implemented. In other words, world models can have an impact even though we acknowledge significant decoupling (J. Meyer & Rowan, 1977). Second, world models are bound to inscribe themselves in the local or national in a variety of
different manners. Here again, the identification of broadly shared world models is compatible with a more sophisticated theorization of the hybrid local inscription of those models, of the significant amount of translation and interpretation work that comes together with local appropriation (Sahlin & Wedlin, 2008).

Transparency is clearly one of these cognitive and normative patterns with a transnational scope and ambition (Garsten & De Montoya, 2008; Hale, 2008). Over the last decades, transparency has evolved into a constitutive norm of contemporary political and economic governance, both in Western liberal democracies and, increasingly, in the rest of the world, too (Hood & Heald, 2006). It is, in particular, highly structuring of governance with a transnational reach (Holzner & Holzner, 2006). Democratic transparency, and its translation into a principle of freedom of information, has progressed as a world model in the past decades in parallel with the myth of democracy. Today, democracy has become a global political norm (Sen, 1999; Torfason & Ingram, 2010), diffusing within the boundaries of nation states as well as in the transnational arena (Markoff, 1996). As is the case for any global norm, diffusion has come with variable degrees of decoupling between norm and practice across time and space, (Meyer & Rowan, 1977). However, as Figure 1 clearly shows, the pressure for democratization has significantly increased over the last 40 years or so:
One of the key indicators of democratization today is the progress of information rights – and hence of freedom of information laws. The assumption is that transparency is a prerequisite for information, which itself is a necessary condition for deliberation and democratic participation (Habermas, 1991). Hence, information-based accountability mechanisms between the public and the state are an important dimension of democratization, with the idea that “public accountability” – as with “sunlight” – can “kill infections” (Hood and Heald, 2006).

**Transnational Governance and the Construction of World Models**

Those models that populate the transnational world and turn into cognitive and normative maps with a (more or less) strong performative impact nationally and locally are in no way natural or eternal. Rather, they are ideational and social constructs and hence contextual and time-bound. The construction, stabilization, diffusion and implementation of those models all require a great amount of
“institutional work” understood as “the purposive action of individuals and organizations aimed at creating, maintaining and disrupting institutions” (Lawrence & Suddaby, 2006, p. 215).

This intense work characterizes contemporary dynamics of transnational governance (Levi-Faur and Jordana 2005, Djelic and Sahlin-Andersson 2006). Over the past decades, dense transnational activism has taken place in the context of polyarchic and overlapping governance structures, in which multiple actors (individuals and organizations) claim a right to engage in the building of norms and rules, but also in their diffusion and monitoring (M. L. Djelic & Sahlin-Andersson, 2006; Graz & Nölke, 2007; Levi-Faur, 2012). An important task for those coalitions of actors is to codify, frame, and standardize practices, in particular by negotiating and issuing rules, norms, or standards. They are also involved in the elaboration and activation of processes that make it possible to monitor the adoption and implementation of those rules, norms, or standards ad they get to be appropriated.

The consequence is a privatization of some sort of governance capacity and authority, sometimes partial, often without a clear ownership of the project (Büthe & Mattli, 2011; Graz & Nölke, 2007; Hall & Biersteker, 2002; Underhill, Higgot, & Bieler, 2000). States remain involved, but in different ways. In certain circumstances, they may themselves become subject to transnational regulatory activities, hence turning into “regulated regulators.” (Jacobsson, 2006). The complex, multi-stakeholder dynamics associated with contemporary transnational governance can be effectively captured through the conceptualization of transnational communities(M. L. Djelic & Quack, 2010).

Transnational Communities and the Dynamics of Transnational Governance

Transnational communities can be defined as “social groups emerging from mutual interaction across national boundaries, oriented around a common project or ‘imagined’ identity” (M.-L. Djelic & Quack, 2012, p. 75). These communities are coordinated through interaction and mutual observation, conscious common orientation and a shared identity that is neither given nor taken-for-granted but should be constituted and nurtured through time. This common identity then generally fosters
strategies of mobilization and action on the ground. The notion of transnational community, when used as a conceptual frame, brings attention to informal and fluid transnational structures maintained through socializing and maintenance of some common objectives, values, norms or identities. In that respect:

“communities are seen here as distinctive social forms as compared to markets, hierarchies, or networks. Whereas the coordinating mechanism in markets is exchange, in hierarchies command, and in networks negotiation, in communities, it is mutual observation and the conscious orientation of individual behavior towards shared values, knowledge, or skills” (M.-L. Djelic & Quack, 2011, p. 75).

We propose that the emerging conceptualization of “transnational communities” is a useful prism to look at what has been happening around democratic transparency and FOI acts during the past twenty years or so. We plan to build upon the emerging literature on transnational communities to make sense of the intense transnational dynamics that have characterized this arena. We are interested in the emergence and structuring of the community – and we hope to document which organizations, actors, framing strategies, technologies and opportunity structures have enabled and fostered the emergence and development of this community. We also want to explore the ways in which this community is being sustained and tightened through time. Finally, we wish to document the processes through which this community in turn mediates the global circulation, translation and adoption of FOI laws.

Beyond the interest in transnational communities per se – as unlikely and complex architectures where identities, values and norms are being created and nurtured in spite of multiple differences – we also hope to contribute to the emerging scholarship focusing on the role of those communities in transnational governance (Cotterrell, 2013; M. L. Djelic & Quack, 2010; Maggetti, 2013). Transnational communities play an important role today in the diffusion and stabilization of the common standards, rules and norms that shape and govern interactions and actions between individuals, organizations, and even states, across and beyond national and regional boundaries.

In our study of the global emergence of Freedom of Information norm, we aim to deconstruct an example of a the emergence of a dense community of organizational
and individual actors which has facilitated and has been in turn influenced by the institutionalization and global circulation of principles of democratic transparency and the FOI norm. In the sections below, we lay out some of our preliminary findings. In the coming months we aim to extend our analysis of FOI related documentation and archives and to conduct interviews with individuals who have been influential in driving the global FOI movement.

The ‘Principle of Publicity’ - From Early National Pioneers to International Diffusion

We can trace (proto-) democratic forms and aspirations quite far back in history, in a number of different contexts – notably Ancient Greece and the Viking Age (Stockwell & Isakhan, 2011). Arguably, though, our modern form of democracy has its roots in Western Enlightenment and in its defining antecedent movement, the Protestant Reform (Trevor-Roper, 1967).

The Enlightenment man sought to escape his “self-incurred tutelage” (Kant, 1965: 89). Reacting against the stifling authority of traditional power holders, Enlightenment philosophers identified “publicity”, the structuration of a public Agora, the expanding role of the press, the “rule of law” and the systematic institutionalization of counter-powers as mechanisms that would increase openness and choice in the political process. From the 18th century onwards, the proliferation of salons and literary, political or economic leaflets and publications reflected this logic: all directly engaged private individuals in debates and deliberations on various kinds of issues (Habermas 1991).

This emergent “public opinion”, formed through the mediation of a budding “public sphere” was a new “sovereign” challenging traditional authorities. States and national policies soon began feeling the pressure as the emergence and deployment of the public sphere came together with increasing demands for “publicity”, information disclosure, political transparency and public and state accountability (Habermas 1991: 65). While originally limited to the Bourgeoisie, the phenomenon of the politicized, empowered and demanding private actor expanded during the 19th century (J. W. Meyer, 1990). The empowered and self-directed individual was not merely entitled –
but duty-bound – to deliberation, choice, representation, education and information. In time, even women would come to be included!

The Kingdom of Sweden and the 1766 Ordinance

Within the broad cultural context of the Enlightenment, the Kingdom of Sweden (extending then over the territories of both Finland and Sweden) was the first to turn ideas into political practice. As early as 1766, the country adopted what is considered to be the first Freedom of Information (FOI) law – His Majesty’s Gracious Ordinance Relating to Freedom of Writing and of the Press (ACF, 2012; Chydenius, Jonasson, & Hyttinen, 2012).

The principle at work behind this law is known in Swedish as the Offentlighetsprincipen – the “Principle of Publicity” or “Openness” or “Public Access”, implying that all citizens have a right to know about the activities of those who govern them:

“In order that nothing should be lacking...we wish to extend the freedom of writing and of the press to the extent that all specific events or known incidents, in part secret and in part more familiar, that have occurred under past governments, either in this kingdom or elsewhere, may be made public, together with political comments on them” (Ordinance 1766 in Jonasson and Hettynen 2012:16).

Anders Chydenius was instrumental in drafting the Act and pushing for its adoption (ACF 2012). Chydenius was a priest from a small peripheral town, Kokkola, in today’s Finland. He was also an enlightenment thinker that turned to politics in order to champion freedom of commerce, which required, he believed, freedom of writing about and publishing “information on affairs of the state”:

“(T)he legitimacy of the freedom of writing and printing is one of the strongest defences of our freedom. But if only biased arguments and corrections ever see the light, the high representatives themselves will remain
in darkness. The highest power must therefore with tender and caring eyes also regard this facet of our freedom” (Chydenius 1765 as quoted in Manninen, 2006, p. 38).

Chydenius is often referred to as the “Adam Smith of the Nordic countries” (ACF 2012). Arguably, the peripheral location of Chydenius – both geographically and in terms of networks of influence – was a defining element of his fight for a “principle of publicity”:

“In the centres of the realm direct and secretive links to the cores of power could function well enough, but for the peripheries it was important to expand freedom, publicity and the accessibility of information, and thus improve the possibilities of independent action” (Manninen 2006: 32)

In his thinking about freedom of the press and the principle of publicity, Chydenius acknowledged the influence of the writings and ideas of the Swedish political writer, Anders Nordencrantz. Nordencrantz was himself strongly engaged against political censorship and wanted to open the “secrets of the state”. The list of dimensions on which light should be shed, according to him, proved quite long – “the work of civil servants and their positions of power, extraordinary tribunals, national finances, corruption, privileges and the conferring of honors” (Skuncke, 2011, p. 136). Strangely enough, in his writings championing publicity and freedom of the press, Nordencrantz did not use England as a model or positive benchmark. Instead, he talked about China. Or rather, he relayed an idealized depiction of China as revealing an enlightened form of despotism infused by Confucian ethics that put “the people” (and not the ruler) at the center (Cheng, 2009). He borrowed this depiction from a text written in 1735 by a French Jesuit, Jean-Baptiste du Halde. Du Halde himself had never been to China and he wrote his Description géographique et historique de l’empire de la Chine et de la Tartarie chinoise in 1735 using accounts and testimonies from Jesuit Missionaries who had spent long periods of time in China (Manninen 2006). This text and the benign depiction of China it carried had been translated and appropriated across Enlightened Europe and had become, as it were, the authoritative text on China in the first part of the 18th century (Cheng 2009). A few decades later a
lot of what was in that text was shown to be inaccurate (Manninen 2006, Cheng 2009). Still, this flawed and biased document was an important element of the intellectual justification for the first Freedom of Information Act – the 1776 Ordinance of the Kingdom of Sweden.

A major contribution of the 1766 Ordinance was the abolition of censorship, with an exception though for those texts that would attack or disparage religion (“our true faith and the pure evangelical doctrine”) or the royal institution and house (Ordinance 1766 in Jonasson and Hyttinen 2012: 10-11). The scope of the Ordinance was hence limited from the start and, in the following years, it would be further restricted or even suspended altogether for a period (1772-1809). Still, it imposed the principle of publicity as a structuring principle that would return to be and remain central in both Sweden and Finland from the 19th century forward (ACF 2012). By the early 1960s, though, Sweden and Finland were still the only two countries with a legal formalization of the publicity principle. It was only after the United States adopted its Freedom of Information Act, in 1966, that the rest of the world would follow in rapid succession, as we will show in the next sections.

**The United States and the 1966 Freedom of Information Act**

The United States had formalized the right to freedom of expression, at the creation as it were, in their Constitution, through the well know First Amendment of the Bill of Rights:

“Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble, and to petition the Government for a redress of grievances” (Bill of Rights 1791).

The Bill of Rights integrated both the freedom of speech and the freedom to print. However, it did not clearly refer to a “principle of publicity” or “openness” or “public access” and hence to transparency as a necessary condition of enlightened government. This would be, on the other hand, the key contribution of the 1966 Federal Freedom of Information Act (FOIA):
“The 1966 FOIA provides that any person has a right, enforceable in court, to access federal agency records, except to the extent that such records (or portions of them) are protected from public disclosure by certain exemptions or exclusions. The exceptions and exclusions protect classified information, individuals' privacy, confidential information used for law enforcement purposes, and trade secrets” (USDOJ, 2014).

The introduction of the Freedom of Information Act in the United States, in 1966, was the consequence of several developments. First, the increasing number and expanding role of government agencies under the New Deal had led to complexity of the governmental sphere, a degree of opacity and the desire both within Congress and parts of civil society to keep the government in check. Second, the civil rights movement and more generally the radicalization of American politics in the 1960s in the United States also played an important role (Ackerman & Sandoval-Ballesteros, 2006). Third, the introduction of the right to information in a number of important transnational treaties since the late 1940s (as we document in the sections below) could not but have an impact.

Initially, President Lyndon Johnson opposed the Bill presented by the Californian Democratic Congressman, John Moss, but the House passed it in 1966 with an overwhelming majority. Reluctantly, Johnson signed it on July 4th, 1966, recognizing that “Democracy works best when people have all the information that the security of the Nation permits” but warning that “at the same time, the welfare of the nation or the rights of individuals may require that some documents not be made available” (Johnson, 1966). The hesitation and reluctance of Johnson to sign such an Act can be seen in the changes he made to his signing statement from version 1 to version 2 (Johnson 1966). He personally took out from that statement two paragraphs written by his collaborators that underscored the desire to control government as a justification of the bill. And the words below hence do not appear in the finalized version of the signing statement:

“(People) must have access to the policies and rules by which departments and agencies operate. Government officials should not be able to pull the curtains of secrecy around the decisions, which can be revealed without injury to the
public interest. Good government functions best in the full light of day…. The decisions and policies – as well as the mistakes – of public officials(should) always (be) subjected to the scrutiny and judgment of the people (Johnson 1966).”

This initial reluctance certainly explains why the US Federal FOI Act was not effectively used – at least before the Watergate scandal. Then, a strong media driven campaign imposed a consequential reform of the Act in 1974 that would give it more “teeth” ((Michener, 2011, p. 148).

Following the introduction of the FOI Act at the Federal level in the United States, American states introduced similar (if not cut and paste) “sunshine” laws. Florida did so in 1967, California in 1968, New Jersey or Colorado in 1973 and New York or Tennessee in 1974. By now, all fifty American states have enacted a FOI law.

**The Diffusion of FOI Acts across the World**

The inscription of the “publicity” and “freedom of information” principles into international texts and institutions certainly accelerated, if it not altogether fostered, the diffusion of freedom of information acts across the world and their adoption in many different national contexts.

After the United States adopted its Freedom of Information Act in 1966, there was rapid adoption across the western world of freedom of information (FOI) laws. Non-Western countries followed somewhat later and FOI laws have spread fast around the globe over the last three decades. Those FOI laws all endorsed the importance of freedom of opinion, freedom of assembly but they have also integrated freedom of information and the publicity principle as described above. Hence FOI laws give citizens, other residents, and interested parties the right to access documents produced and held by governments without being obliged to demonstrate any legal interest or "standing" (Ackerman & Sandoval-Ballesteros, 2006:6). In 1966, only three countries in the world had a FOI law – Sweden, Finland and the United States. There were 12
countries with such a law in 1990. As Figure 1 shows, adoption was after that particularly rapid and by 2010, close to 90 countries had a FOI law in place. Notable regional exceptions are the Middle East and Sub-Saharan Africa.

Figure 2. Global adoption of Freedom of Information Act 1966 - 2003

Nations with a Freedom of Information Act in 1966 (dark shading)

[Map showing nations with a FOI law in 1966]

Nations with a Freedom of Information Act in 2013 (dark shading)

[Map showing nations with a FOI law in 2013]

Source: opengovernmentrecords.net (updated by authors)

Interestingly, the adoption of FOI laws within national polities across the world has progressed relatively independently of the nature of governments. This certainly explains that in spite of such rapid formal adoption, several external observers (the NGO Transparency International in particular) still consider many countries with formal FOI laws to be highly opaque. The swift adoption of FOI laws by a number of

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countries that remain in practice highly non-transparent is consistent with the findings of Hafner-Burton et al. that nations with the worst human rights records are more likely to adopt the UN Human Rights charter in order to improve their legitimacy within the international community (Hafner-Burton, Tsutsui, & Meyer, 2008). The diffusion of FOI laws and of the notion of transparency as a tool for democratization has naturally come with a fair amount of localized translation reflecting the encounter between a formal world society norm and embedded institutions and practices (Roberts, 2000). This suggests that what appears at first sight as a single transnational formal standard is likely to play out on the ground rather as a set of more or less connected and compatible localized standards of practice – or in fact, of absence of practice! There is great variability today when it comes to national FOI Laws – from (relatively) effective implementation to (pure) window-dressing (Michener 2011).

This variability reflects a number of different factors. First are factors relative to the adoption of the law itself – why did a particular country come to adopt a freedom of information law? At one extreme, the reasons could be that a FOI law emerges mostly internally, as a functional feature of a democratization process (Torfason and Ingram 2010). The logic here is that information and publicity principles are prerequisite conditions for democratic participation and deliberation (Habermas, 1991) and instruments to ensure “public accountability”, which like “sunlight” can “kill infections” (Hood & Heald, 2006). A country developing a democratic regime hence requires, functionally one could say, such a legislative move. At the other extreme, a country may come to adopt an FOI Law in a manner quite decoupled from internal functional requirements – either under direct pressure from transnational organizations and/or as a legitimacy enhancing mechanism or even worse as a way to divert attention from mock or fake democratization (Michener 2011). Other factors are those having to do with resources and capacities, on the ground, for implementation. This will vary with a number of things. It will depend on the political dynamics of the process of legal inscription itself and the degree to which the law was then limited and curtailed by the introduction of a number of exemptions. It will depend on the pre-existing strength of the public sphere and of the democratization agenda in a given country – and hence on the capacity of various activist groups to mobilize as champions of freedom of information. It will also naturally reflect the particular political climate in that country at any particular point in time. It will finally
depend also on the structural resources available in a given context to implement and enforce the law – and for example to allow broad accessibility to government documents by deploying costly technologies. All of these factors combine to account for the fact that, in spite of rapid formal diffusion, the reality of the freedom of information world remains quite different on the ground today from country-to-country.

**The Principle of freedom of information in the transnational arena**

One of the important background conditions for the passing in 1966 of a freedom of information Act in the United States was the inscription of the ”publicity principle” in the founding texts of major international organizations – and particularly the United Nations.

**The Intergovernmental Phase – Towards a Transnational Inscription**

On June 26, 1945, at the end of the United Nations Conference on International Organization in San Francisco, the representatives of 50 countries signed the United Nations Charter. During its First Session, in 1946, the General Assembly of the UN adopted a number of resolutions, amongst which Resolution 59 can be seen as an important early step towards the institutionalization of democratic transparency as a global norm. Resolution 59 made it clear that “Freedom of information is a fundamental human right and is the touchstone of all the freedoms to which the United Nations is consecrated”. Freedom of information, it went on,

“implies the right to gather, transmit news anywhere and everywhere without fetters. As such it is an essential factor in any serious effort to promote the peace and progress of the world. Freedom of information requires as a basic discipline the moral obligation to seek the facts without prejudice and to spread knowledge without malicious intent” (UN59 1946).

The Resolution ended in a call to organize rapidly an International Conference on Freedom of Information (UN59 1946). This Conference was held in Geneva in March and April 1948. Upon closing, it solemnly declared that
“Freedom of information is a fundamental human right; that each individual has a right to freedom of thought and expression; that he may hold opinions without interference and seek, receive and impart information and ideas by any means and regardless of frontiers” (Whitton, 1949, p. 74)

The work of that Conference was in part infused into the ongoing discussions around the preparation of a Universal Declaration of Human Rights. The Charter of the United Nations had affirmed in 1945 the “faith” of signatory members in “fundamental human rights” (UNCharter 1945). Article 68 required the Economic and Social Council to rapidly set up a Commission on Human Rights. This Commission met for the first time in January 1947 and it produced the *Universal Declaration of Human Rights* (UDHR). Forty eight members of the General Assembly endorsed this Declaration in December 1948, in Paris – eight abstained. Articles 18, 20 and more particularly 19 of the UDHR affirmed the importance of freedom of opinion but also of freedom of debate and information.

“**Article 19**: Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers” (UN-UDHR 1948).

The wording that was used in the three articles of the UN-UDHR would in turn influence the writing of many transnational and national texts in the following years. The International Covenant on Civil and Political Rights that was signed by the UN General Assembly in 1966, even though it only came into force in 1976, strongly reaffirmed that every person shall have the right to seek and give information freely, in its own Article 19. All in all, those three articles anchored the notion of freedom of information and the principle of publicity, openness or transparency (even though the latter term was not used then) into the emergent web of transnational treaties and organizations (UN-UDHR 1948). Lo and behold, the infusion of the information principle into the Universal Declaration of Human Rights went even further. It turned the right to information into a *Human Right*, hence laying strong foundations for the naturalization of “openness” and “transparency” that would follow (Chydenius et al., 2012).
In the first three decades of the transnational inscription and governance of the Freedom of Information movement, the intergovernmental organizations, especially the United Nations with a clear mandate from the states played a central role. Such organizations focused on standard development, event organization around freedom of information.

**Towards a Transnational Community of Democratic Transparency**

Since the 1980s, we have seen with respect to transparency as with other issues, an important shift in the nature of governance structures in the transnational arena. Private and multi-stakeholder arrangements have come to complement and displace in part intergovernmental negotiations. During the 1980s, the US government started to challenge intergovernmental organizations such as the UN and the WHO and in several instances cut its funding of several UN and WHO programs (Siddiqi, 1995). In parallel national donors and private Foundations started funding think thanks, research organizations and new private technologies of governance such as rankings as part of their broad “development strategy”.

The emergence of a “development industry” (Powell & Seddon, 1997) happened in the context of major geopolitical disruptions. The breakdown of the USSR and the rapid development and transformation of Eastern European and Asian countries led to the emergence of several transnational organizations with specific regional mandates for “democratization” and transparency. The Open Society Foundation, for example, with a special focus on Eastern Europe, started to fund local NGOs, lobbied in many different local contexts for the progress of transparency and democracy and contributed to the production of international rankings and country reports (Robinson & Bawden, 2001). Since the 1990s, the number of organizations and actors championing freedom of information, democracy and transparency across the world has simply exploded. These organizations may sometimes compete but they also often collaborate and create coalitions of action, more or less dense networks. Those organizations, networks and coalitions engage in lobbying, funding initiatives, standard development, as well as in the production and monitoring of neoliberal governance technologies such as rankings, naming and shaming tools or signatories lists.
The consequence of such dense regulatory activism is the multiplication of tools, artefacts, standards or proto-standards defining and framing democratic transparency. The international ratings of states’ levels of “transparency” that organizations such as Transparency International, Freedom House or the IMF have developed are examples of potent cognitive frames and normative instruments having a consequential impact. This proliferation may appear to create a chaotic landscape – but complexity should not necessarily be seen as stable. Several socialization processes and normative instruments are at work that may push through in the direction of at least partial convergence if not homogenization. Western-type media and education and their worldwide diffusion are also important socialization mechanisms with possibly a long-term impact. May be even more importantly, we see the emergence and stabilization of a dense ecology of actors, organizations and networks bound together by the transnational fight for the “freedom of information”. We see, in other words, the emergence of a broad-based, project and value-based transnational community, where members share what can be described as a culture if not a cult of “transparency” (Djelic and Quack 2010; Djelic and Quack 2011).

**The Challenge of Transnational Community Building**

Since the 1990s, several organizations have emerged, within this ecology of transparency champions, with a focus on building and sustaining the transnational community. Examples are International Freedom of Expression Exchange (IFEX), International Budget Partnership, The Access Initiative (TAI), freedominfo.org, The Freedom of Information Advocates Network (FOIAnet) all of which were founded between 1992 and 2002 and have as their specific focus the building and sustaining of a transnational community for freedom of information. Their activities include event organization and the structuring of online message groups and forums. Up to the late 1980s, intergovernmental bodies had been organizing international conferences on FOI and “Open Government” (with one exception). Since the 1990s, though, private organizations such as Access Info and Transparency International have become active event organizers. Today, more than 80% of annual events with a transnational scope are organized by private organizations.
Transparency International is one of the oldest nodes of the transnational transparency community. An NGO founded in 1993 through the initiative of Peter Eigen, a former high-ranking member of the World Bank, Transparency International has become by now a global actor that monitors and makes public different measures of corruption across the world (IT 2012). Notable is the fact that Transparency International was the first organization to directly use in its self-definition the word and notion of “transparency”. Freedominfo.org is a virtual network that was also launched in 2002. In its self-description, it is a one-stop portal that describes best practices, consolidates lessons learned, explains campaign strategies and tactics and links the efforts of freedom of information advocates around the world” (FIO 2012).

Initial funding for this network came from the Open Society Foundations that was set up in 1984. The network of Open Society Foundations (previously Open Society Institute and better known as the George Soros Foundation) defines its mission as working “to build vibrant and tolerant democracies whose governments are accountable to their citizens” (OSF 2014). Article 19 (which takes its name from Article 19 of the UN UDHR) is an NGO based in London and created in 1987. Working with “90 partners across the world”, Article 19 defines its mission as “strengthening national capacities and building or reforming institutions to protect transparency and the free flow of information” (Article 19 2012). The Right2INFO.org is an information website that was launched in 2008 again by the Open Society Foundations. Its mission is to aggregate legal and constitutional information on the right to access information across the world, as well as to build a library of case laws from more than 80 countries (Right2INFO 2012).

The Freedom for Information Advocates Network (FOIA.net) was created on September 28, 2012. It defines itself as “an international information-sharing network of organizations and individuals working to promote the right of access to information” (FOIA.net 2012). As of April 2012, it counted 200 members, mostly civil society organizations – including Article 19, the network of Open Society Foundations, Right2INFO.org and Transparency International. FOIA.net has established September 28 as a global “Right to Know Day” and celebrates that day every year through the organization of events in different regions of the world. We could go on, as the community appears to become ever more dense each day.


**Codes, Soft Laws and Governance Knowledge Forms**

As mentioned above, the early transnational inscription and codification of Freedom of Information happened through the United Nations and the European Union. Since the 1990s, however, private organizations, networks and coalitions have become actively involved in the production and monitoring of FOI “principles”, “voluntary codes” and norms.

Article 19, for example, checks the “quality of FOI laws” in general. The Extractive Industries Transparency Initiative is a multi-stakeholder initiative, which has developed freedom of information norms when it comes to the revenues of national governments from extractive industries. Another interesting example is the Medicines Transparency Alliance. Also a multi-stakeholder initiative, it aims at opening access to government information on medicines procurement and regulation. Similarly the International Aid Transparency Initiative (IATI) is a multi-stakeholder initiative, which develops a freedom of information code on development aid provided by Western governments. Yet another case is that of the Global Initiative for Fiscal Transparency (GIFT). The GIFT is a “multi-stakeholder action network” (in its own description), with a strong presence of the IMF. It has worked since its creation in 2012 to:

> Advance and institutionalize global norms and significant, continuous improvements on fiscal transparency, participation, and accountability in countries around the world (GIFT 2014).

Norm setting also occurs through the deployment of rankings and other normative instruments. Rankings or ratings such as *Business Friendliness* (World Bank) or *Global Right to Information* (*RTI* – developed jointly by Access Info Europe and Centre for Law and Democracy, Canada) attempt to set global norms and to effect behavioural and cultural change in the process. Behind an often strictly scientific and measurement-based posture, we find in fact powerful normative agendas – with a strong performative potential. Promoters of the RTI rating thus describe their methodology:
The Indicators are drawn from a wide range of international standards on the right to information, as well as comparative study of numerous right to information laws from around the world. A draft set of Indicators was honed in two ways. First, AIE and CLD conducted a pilot application of the draft Indicators on a number of countries from around the world, adapting them to address any problems that arose. Second, an Advisory Council of renowned experts on the right to information provided detailed advice to AIE and CLD on the development of the Indicators (RTI 2014).

**Enforcement Technologies and Normative Instruments**

As private organizations, networks and coalitions increasingly came to shape the transnational transparency arena, compliance mechanisms were also bound to change. From coercion and sanction, compliance would have to evolve towards softer kinds of technologies – relying more on socialization, participation, peer pressure, imitation and seduction. The absence of “hard power” and/or sanctioning capacities that characterizes private based authority and a broad preference, in a neoliberal world, for market-based regulatory mechanisms are crucial to understand that evolution.

Concretely, this evolution has meant that instead of active, contextualized and direct forms of governance, we have increasingly moved towards de-contextualized technologies of calculative accountability. Such technologies appear to be highly performative. Besides their broader role in defining and/or stabilizing norms and language, rankings enable decision and action at a distance. Rankings generally trigger discursive as well as behavioural changes at the national and local level – states trying to improve their relative positioning in the various ranking markets that they target. The impact of those rankings varies from a mere change in self-presentation techniques and reporting all the way to a complete colonization of local practices (Espeland & Sauder, 2007).

Influential normative instruments such as the Corruption Perceptions Index (CPI – Transparency International) have been crucial components of the transnational transparency governance assemblage putting isomorphic pressures, especially on weaker states. Intergovernmental Organizations such as the World Bank and the IMF have also started to use such technologies of calculative visibility to push for compliance with their own transparency codes such as the Fiscal Transparency listings of the IMF and the Business Friendliness Ranking of the World Bank (Hansen...
I have deleted this because we already talked about it above

**Neoliberalism, Investors and FOI Community**

Since the 1980s, there has been a neoliberal reformulation of Freedom of Information as a basis for investor confidence and market stability. This had led to increased linkages and complementarities between the neoliberal reform community of organizations and the FOI community.

This new formulation of government openness has been central to policy recommendations of the IMF in its “structural adjustment” programs in Latin America backed by conditional loans. As an example, the Fiscal Transparency initiative coordinated by the IMF highlights that:

> “There is consensus that good governance is of central importance to achieving and sustaining macroeconomic stability and high-quality growth; and that sound fiscal management—including fiscal transparency—is a key aspect of good governance. Fiscal transparency allows better-informed debate by both policymakers and the public about the design and results of fiscal policy, and helps establish accountability for its implementation. In strengthening understanding of macroeconomic policies and choices, fiscal transparency can improve access to domestic and international capital markets.”

Neo-institutional economics has provided the intellectual munitions for this kind of transparency drive, with highly significant transformative consequences (Cajvaneanu, 2011). Neo-institutional economists claim that the institutional attributes of hierarchies such as states or corporations drive economic development (North, 1990). Rule of law, transparency in fiscal and monetary policy, transparency in the management of property rights and open legislative and governing processes are all identified as core institutional elements that foster market stability, investor confidence and economic development (North, 2004). Building on this kind of theoretical argument, international organizations such as the IMF or the World Bank propose to encourage the global development of transparency practices in institutional frames, with the ultimate aim of facilitating market-based activities. It was this line of thought that led to policy debates around “good governance” for different types of

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3 For the conceptual link between neoliberalism and the work of North, see Foucault (2008, p. 135).
organizations, with transparency as a key mechanism. The definition of transparency as proposed by the IMF reveals an ambitious objective: to transform all social structures with a view to rendering markets more stable and efficient. According to the IMF, transparency is:

“…an environment in which the objectives of policy, its legal, institutional and economic framework, policy decisions and their rationale, data and information related to monetary and financial policies, and the terms of agencies’ accountability, are provided to the public on an understandable, accessible and timely basis… In making available more information about monetary and financial policies, good transparency practices promote the potential efficiency of markets” (IMF, 1999).

In the World Bank’s World Development Report 2002 – which draws heavily on institutional economics, the work of North in particular – even media freedom is justified through a market-based rationale:

“Media can play an important role in development by affecting the incentives of market participants – businesses, individuals, or politicians – and by influencing demand for institutional change” (WorldBank, 2003).

Hence, building on institutional economics, the World Bank and the IMF have essentially moved from an earlier “economic shock therapy” doctrine to an “institutional shock therapy” program (Cammack, 2004). As a result, states are increasingly subject to transnational transparency pressures based on purely market logics. Furthermore, these pressures increasingly compete with nation-based democratic and accountability pressures (Rodan, 2006). The primacy of transparency as a key tool for transforming not only markets but also all other societal institutions in the “rest of the world”, is manifest in statements made by the head of the IMF during the Asian crisis. At that time, Michel Camdessus spoke of transparency as the “golden rule” of the new international financial system, describing it as “absolutely central to the task of civilizing globalization”. He further stated:

“A lack of transparency has been found at the origins of the recurring crises in the emerging markets, and it has been a pernicious feature of the crony capitalism that has plagued most of the crisis countries and many more besides. More positively, the very first principles of the market economy tell us that open, competitive markets function only where transparency exists” (Camdessus, 1999).
Neoliberal market-based transparency thus targets structures and organizations well outside markets and deeply embedded in the social and political fabric of most countries. This transformation in the meaning of market-based transparency pressures has not only had repercussions in the “rest of the world”, but increasingly in the West, too. One of the founding documents of the European Lisbon Treaty demonstrates that such an understanding of transparency has also come to prevail within the European Union:

“[A]s demonstrated by many studies (e.g. Easterly and Levine, 2002; Rodrik et al., 2002), the most important among these ‘non-standard’ factors are institutions, including in particular the rule of law, property rights, and social capital. These studies have confirmed the earlier view by North (1990) that stable institutions, and in particular the rule of law and protection of property rights, are essential for establishing a favourable business climate and assuring investors that they can safely invest and retain the returns on their investment” (Sapir, 2003).

Consequently, nation states across the world are feeling the pressure to open and transform their institutional systems in ways that would serve the “stability of markets”. This appears to be synonymous with “investors’ interests”.

This new formulation of government openness and FOI has led to increased linkages between the FOI community and neoliberal think thanks and intergovernmental organizations focused on market liberalization such as the IMF, the World Bank and the World Trade Organization. Conversely, actors in the FOI community, which originally framed FOI only in democratic terms, have started to also frame it with regards to its implications for economic development, investor confidence and access to capital markets. For example, the chair of Transparency International, Huguette Labelle starts in an article in 2010 by saying:

Governments must put transparency and accountability at the heart of all rescue and reform measures if they are to regain public trust and investor confidence (Labelle 2010)

An example of the linkage between market driven and democratic communities for government openness is the Extractive Industries Transparency Initiative (EITI), which pushes for government disclosure about payments made by oil/gas and mining companies. The IMF, the World Bank and representatives of investors have been vocal actors in EITI’s governance while Transparency International and the Network
of Open Society Foundations have been involved as representatives of civil society with a democratic discourse around government transparency. According to a recent report co-developed by the IMF and the World Bank (IMF-WorldBank, 2008, p. 3):

“Extractive industries transparency is crucial for ensuring the effectiveness of IMF and World Bank interventions in resource rich countries. Poor transparency facilitates corruption, theft, and mismanagement of revenues generated by EI projects hindering efforts to alleviate poverty and promote macro-economic stability.” (emphasis added)

Franchising of Intergovernmental Transparency Governance

The past 20 years have seen the emergence of a transnational community for freedom of information comprising a diverse set of private actors. Private coalitions or organizations such as Transparency International have taken center stage within global debates about state transparency and freedom of information. As a consequence, intergovernmental organizations have become just one category of actors among others, struggling to maintain its relevance in an expanding community.

An interesting recent phenomenon within the transnational transparency community has come in fact from within large intergovernmental organizations, such as the United Nations. Since 2006, the UN has launched several “self governing” initiatives, which benefit from the UN “brand”. The voice of actors in these initiatives depends on their level of financial contribution. An example is the United Nations Democracy Fund (UNDEF) which was launched under Kofi Annan and with financial assistance of funding members, the US and Indian governments. Since then, funders have expanded to 40 countries. The top 10 funders are all Western (except for India) and the US is the biggest contributor. The UNDEF has faced resistance in some countries such as Nicaragua and Venezuela. According to the diplomatic cables reported by Wikileaks, the US ambassador to the UN said in a meeting with UNDEF (Wikileaks, 2008):

“any mechanism allowing for objections by host governments undermines the very concept of UNDEF, a voluntary fund for which the UN is only the administering agency. US support for UNDEF cannot be sustained if countries can reject projects for political reasons. Sending letters of notification as a
courtesy is one thing, but if they result in countries having a veto over UNDEF Advisory Board decisions it means the end of UNDEF.

Emergence of “self administered” UN bodies as part of the transnational transparency community signifies a new mode and phase in the involvement of the IGOs in that community. UNDEF represents UN governance structures not driven by inclusive states’ mandate but driven by the level of funding. UN has used this market-based model in other areas such as the United Nations Principles of Responsible Investments.

**Preliminary Conclusions**

In this paper we aimed at providing a study of the early national & transnational inscription of the Freedom of Information right/laws. We then provided a study of the emergence and current dynamics of an emergent transnational community championing Freedom of Information.

This research project is still on-going and we are still in the process of completing data collection and analysis. At this point, we only suggest some potential findings that could emerge from this study.

This study identified key periods in the transnational governance of FOI and in the structuring of an associated transnational community. As shown, from 1950s to 1980s, as in other areas such as healthcare, nutrition and corruption etc. inscription and transnational organization of FOI diffusion was primarily in the hands of international organizations with state delegation – that is the Intergovernmental Organizations.

Our study shows then how, from the 1980s forward, the UN became partially side-lined in the global FOI push and how from the 1990s, funded by several US Foundations and then Western state agencies, a constellation of private transnational governance organizations emerged. We identified and described in particular three different kinds of actors that emerged in that phase of transnationalization - standard setting organizations, community building organizations and enforcement organizations.

The funding and governance of private organizations, networks and coalitions
involved in this transnational community were predominantly Western with US government and US based Foundations especially the network of Open Society Foundations and the Ford Foundation frequently as top contributors (see appendix I).

Since 2005, the UN is back in the FOI community under a new structure that we propose to label “franchise governance”. The UN has started to lend its name to self-administered organizations with a “democratization agenda”. The membership in these organizations and their administration is established based on financial contributions of the donors. An example is the UN Democracy Fund.

The debates around transnational governance and the role of states have been mostly about the respective role/power of states in setting global rules/norms and agendas given that they are out-scoped by the scale of international organizations such as the MNCs and also the scale of issues to be addressed such as global corruption, health, climate change etc (Goldblatt, Held, McGrew, & Perraton, 1997; Held & McGrew, 1993). This study brings attention to the key role of intergovernmental organizations – that is organizations with a direct state mandate. As shown, the transnational community for FOI became possible when the IGOs such as the United Nations chose not to fill the regulatory “market” for FOIs. Our study shows how later, the IGOs especially the UN introduced new structures based on market principles and how from being in a dominant position in transnational governance a few decades ago, they became one key actor in the constellation of actors competing for influence, resource and power in the FOI transnational community. We believe in our thinking about the World Society vs. state debates, we need to pay more attention to the role and evolution of IGOs.

Another key finding in our study is the way the FOI transnational community is funded. From their early days, organizations such as Transparency International, Article 19, and later Access Info Europe, RTI Index, etc. have been funded by a limited group of Foundations and state donors. While in early days Foundations especially the Open Society Foundation and the Ford Foundation played a more central role, since the 2000s, several Western donors have also rechanneled part of their funding from national projects to financing transnational governance organizations. Currently private transnational governance organizations represent over 20% of the projects and organizations funded by state-based funds such as the
British Department for International Development. Funding of such organizations is accompanied by power to influence them through use of different transnational accountability technologies such as the Logical Framework and other reporting, representation mechanisms (Martinez & Cooper, 2013). Attention to the funding structure of the FOI transnational community hence shows the strength of a few core Western states in this space. This adds a key element to debates around the power of states vis-à-vis “globalization” and transnationalization of issues formulation, capital flows, and organizations. This case shows that rather than Western states being passive vis-à-vis the transnational governance of FOI, as claimed in the hyper-globalist view on transnational governance (Held & McGrew, 1993), Western states actively attempt to shape this space and a key lever of this attempt is provision of funding through state donors. Compared to the IGO model however, in the transnational community for FOI, states act as market actors and they compete for influence through provision of funding. Attention to the funding structure of transnational communities can shed light on the implications of the “privatization” of transnational governance on the voice and influence of different states.

Our study shows how depending on the broader ideological setting and problematization of issues at different times members with different ideological tendencies and political agenda may start to collaborate in the FOI transnational community. As shown since the 1990s, influenced by the neoliberal push and also the recommendations of institutional economics for government transparency as a precondition for investor confidence, the IMF and the World Bank have launched government transparency initiatives. The framing for this push was primarily investor confidence and macro-economic stability. In this study we showed how this has led to overlaps between the FOI community and the community of actors pushing for neoliberal market reforms. In future studies we need to better understand the conditions under which communities with different ideological agenda are bridged and how linkages and overlaps between such communities are organized and maintained.
REFERENCES


Appendix I – Funders of key members of the FOI Transnational Community

Transparency International Funders

- Department of Foreign Affairs and Trade Australia
- Department for International Development (DFID)
- European Commission (EC)
- Federal Foreign Office (AA), Germany
- Federal Ministry for Economic Cooperation and Development (BMZ), Germany
- Federal Ministry for the Environment, Nature Conservation and Nuclear Safety (BMU), Germany
- Financial Mechanism Office (FMO), Iceland, Liechtenstein, Norway
- Foreign Affairs, Trade and Development Canada
- Foreign and Commonwealth Office (FCO), UK
- French Ministry of Foreign and European Affairs
- Government of Curaçao
- Government of Tunisia
- Irish Aid
- Kingdom of Belgium Foreign Affairs, Foreign Trade and Development Cooperation
- Ministry of Foreign Affairs, Estonia
- Ministry for Foreign Affairs, Finland
- Ministry of Foreign Affairs, The Netherlands
- New Zealand Ministry of Foreign Affairs and Trade
- Norwegian Ministry of Foreign Affairs
- Norwegian Agency for Development Cooperation (Norad)
- Royal Danish Ministry of Foreign Affairs (Danida)
- Swedish International Development Cooperation Agency (Sida)
- Swiss Agency for Development and Cooperation (SDC)
- US Agency for International Development (USAID)

Foundations
• The Christensen Fund
• Open Society Institute (OSI) Foundation
• The Pestalozzi Foundation
• Swedish Postcode Foundation
• The William and Florah Hewlett Foundation
• National Endowment for Democracy (NED)

Corporate sector

• DFL Deutsche Fußball Liga GmbH
• Ernst & Young
• Kohlberg Kravis Roberts & Co
• National Integrity Action Limited
• PriceWaterhouseCoopers
• Shell International BV/Ltd.

Other organisations and institutions

• Association of European Professional Football Leagues
• Christian Michelsen Institute (CMI)
• Deutsche Gesellschaft für International Zusammenarbeit (GIZ)
• European Investment Bank (EIB)
• Financial Transparency Coalition (previously the Task Force for Financial Integrity)
• Malawi Economic Justice Network (MEJN)
• Stockholm International Water Institute (SIWI)
• Transparency International Liaison Office to the European Union
• United Nations Democracy Fund (UNDEF)
• United Nations Development Programme (UNDP)
• United Nations Office on Drugs and Crime (UNODC)
Funders for Article 19 Organization

- Department for International Aid (DFID) / UKAID
- Dutch Ministry of Foreign Affairs
- European Commission
- The Ford Foundation
- Foreign and Commonwealth Office (FCO)
- Fritt Ord
- Norwegian Ministry of Foreign Affairs
- Open Society Institute (OSI)
- Swedish International Development Cooperation Agency (SIDA)
- The William and Flora Hewlett Foundation


Funders for Open Government Partnership

Foundation Contributions

Grants Made in 2013

- Ford Foundation: $600,000 (July 2013 to December 2014)
- Hewlett Foundation: $840,000 (March 2013 to February 2015)
- Omidyar Network: $1,000,000 (June 2013 to May 2016)
- Open Society Foundations: $800,000 (January 2013 to December 2014)

Grants Made in 2012

- Hewlett Foundation: $400,000
- Omidyar Network: $400,000

Government Contributions
• 2014 Contributions
• Government of Indonesia: $200,000
• Government of Norway: $300,000
• Government of the Philippines: $100,000
• Government of South Africa: $100,000
• Government of the United Kingdom: $103,000 (Department for International Development)
• Government of the United Kingdom: $225,000 (Foreign and Commonwealth Office)

Source: http://www.opengovpartnership.org/node/1330