

Freedom of Information: Public in Nature, Closed to the Public

*IPI Freedom of Information Annual
Report*

Introduction	01
Fol requests, objection, and litigation processes	02
IPI Freedom of Information Platform	11
Findings and assessment	14
Current challenges through case examples	22
Policy recommendations	34
Conclusion	39

Introduction

This report has been prepared to analyze how the right to freedom of information (Fol) functions in practice in Türkiye and to assess the quality of responses provided by public institutions to Fol requests. The report is based on an analysis of 423 requests recorded on the IPI Freedom of Information Platform and examines both the legal framework and the key challenges encountered in practice.

According to the platform's data, between January 2015 and March 2026, 49% of requests received a response, 12% received partial responses (only some questions were answered), 27% were rejected, and 12% received no response at all. Of the responses classified as "positive," 55% did not actually provide the requested information.

Of the responses classified as "positive," 55% did not actually provide the requested information.

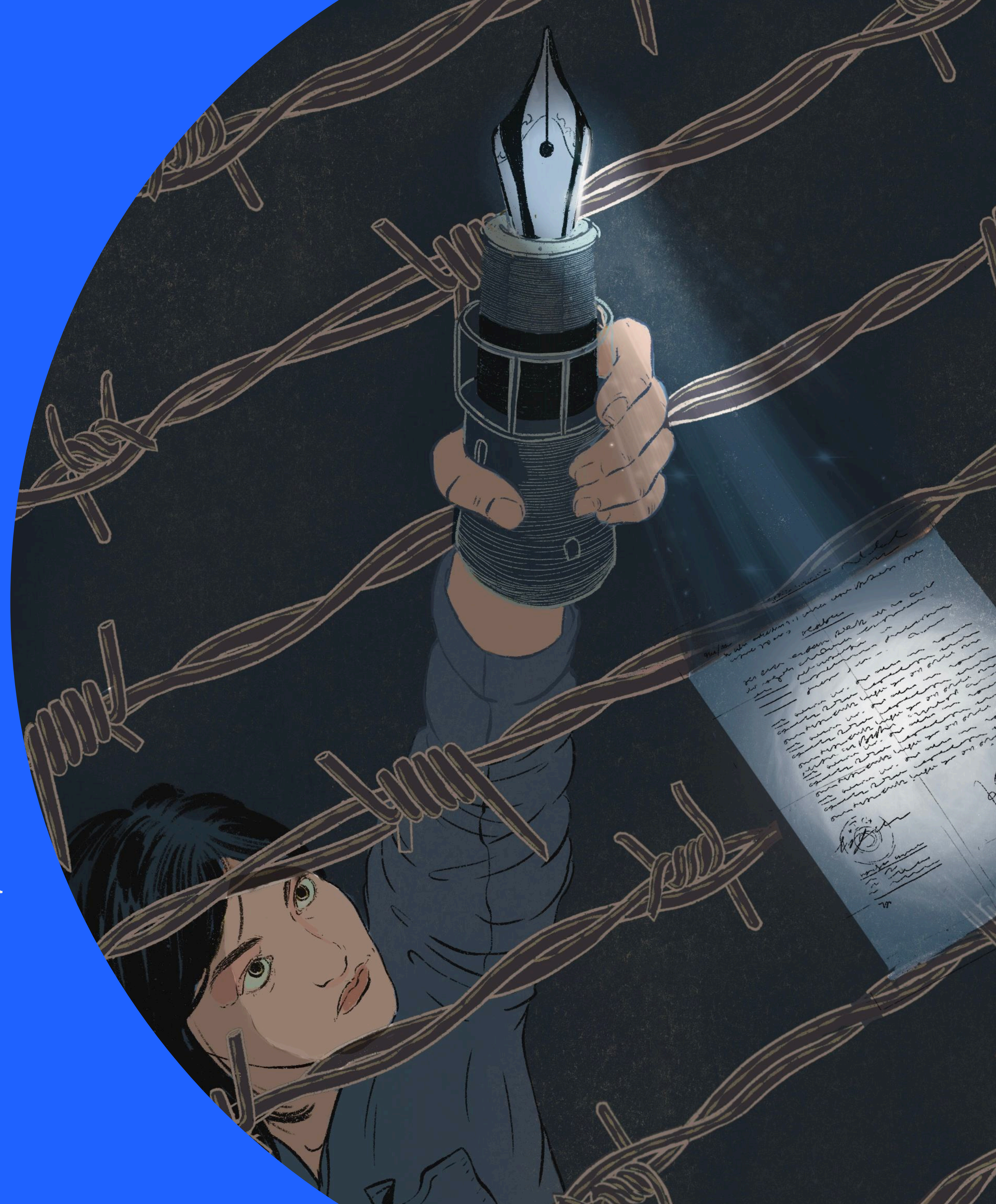
These findings indicate that public institutions often respond to Fol requests in a technical sense, but a significant portion of these responses fail to include the requested information. The arbitrary use of exceptions such as "requires separate or special effort," "commercial secret," and "confidential information" significantly restricts access to data of public interest.

The data also reveals major discrepancies between institutions. While some respond regularly and comprehensively, others reject or ignore a large portion of requests. Despite being legally recognized in Türkiye, freedom of information faces significant structural barriers in practice. This poses a critical problem for transparency, accountability, and democratic oversight in public administration.

These data are based solely on requests recorded on the IPI Freedom of Information Platform and do not reflect the overall outcomes of the official Fol system.

Fol requests, objection, and litigation processes

In this section, we explain how to submit an effective freedom of information (Fol) request and outline the steps you can take if your request is not answered on time or is rejected. We also provide practical guidance to help address the challenges you may encounter when exercising your right to information — one of the fundamental pillars of transparency, accountability, and democracy.



What is a Fol request and how to submit one?

An Fol request essentially involves asking public institutions for information and documents that they produce or hold within the scope of their duties and activities. Any written question directed to municipalities, district governorships, ministries, or even local administrative offices (muhtars), concerning matters within their authority and records, falls within the scope of the right to information.

There are two critical points to keep in mind:

First, your request must be submitted in writing. Second, you should clearly state at the beginning of your petition that your application is made under the right to information.

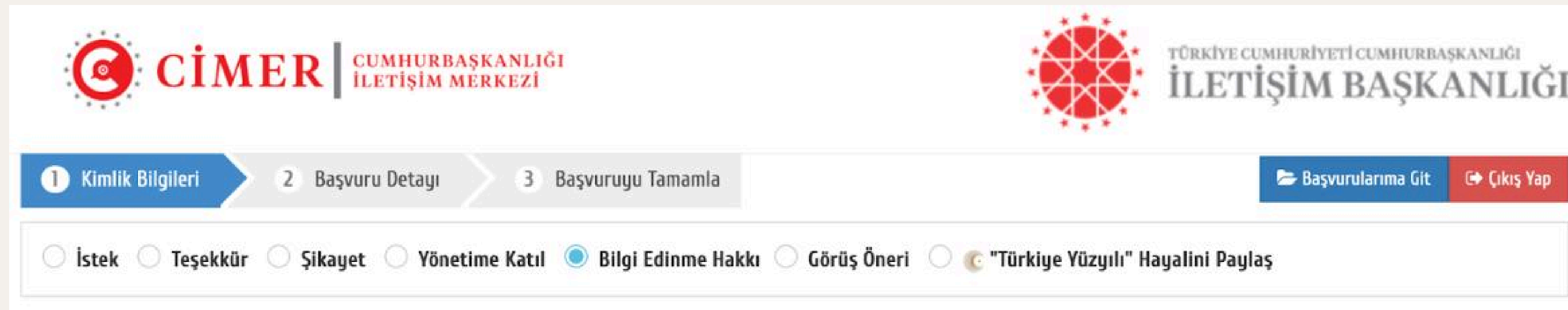
If the institution you wish to contact has a complaint/request/feedback form on its website, you are in the right place. This page should indicate the maximum time frame within which your request will be answered. If no timeframe is specified, the legal response period is 15 working days. If necessary, this period may be extended once for an additional 15 working days.

In addition, you can submit your request through the Presidential Communication Center (CİMER), which has become more widely used in recent years. The main advantage of CİMER is that you do not need to search for forms on individual institutional websites. Instead, you can select the relevant institution from a centralized list and submit your request directly.

However, there are two important points to consider here as well:

First, after logging into CİMER, you need to select the correct category. CİMER is not limited to FoI requests – it is also used for submitting complaints, requests, feedback, and suggestions. Therefore, when using the platform, you must first select the “right to information” option from the top menu (Figure 1).

Second, you can submit only one application per day. This does not mean one application per category. For example, if you submit a complaint, you cannot submit a freedom of information request, request/thank-you note, or any other type of application on the same day.



The image shows the CİMER (Presidential Communication Center) website interface. The header features the CİMER logo and the text "CUMHURBAŞKANLIĞI İLETİŞİM MERKEZİ" on the left, and the Turkish Presidential Communication Directorate logo and text "TÜRKİYE CUMHURİYETİ CUMHURBAŞKANLIĞI İLETİŞİM BAŞKANLIĞI" on the right. Below the header is a progress bar with three steps: "1 Kimlik Bilgileri" (selected), "2 Başvuru Detayı", and "3 Başvuruyu Tamamla". To the right of the progress bar are two buttons: "Başvurularıma Git" and "Çıkış Yap". Below the progress bar is a row of radio buttons for selecting a category: "İstek", "Teşekkür", "Şikayet", "Yönetime Katıl", "Bilgi Edinme Hakkı" (selected), "Görüş Öneri", and "“Türkiye Yüzyılı” Hayalini Paylaş".

(Figure 1)

How to write an effective request

The questions you ask in a freedom of information request should not be framed in a way that allows for simple “yes/no” answers.

If you have multiple questions, you may list them using bullet points. However, instead of including too many questions in a single request, we recommend submitting separate requests. If you ask three questions in one application, there is a high likelihood that only one will be answered. Submitting separate requests increases the chances of receiving a response to each question.

It is important that the information you request covers a specific and not overly broad time period. Institutions tend to reject requests covering long periods — such as the past 10 years — on the grounds that they “require separate or special effort.” To reduce the likelihood of rejection, narrower time frames should be preferred.

Rather than asking for all available information on a given topic, you should be as specific as possible. Clearly and in detail state exactly which information or data you are requesting.

Make sure that you submit your request to the correct institution. If you believe your request may concern multiple institutions, you can save time by submitting the same request to all relevant bodies.

Finally, to avoid being asked to review documents in person, you should include the following statement in your request: “I request that the information and documents be provided to me in electronic format.”

Objection process for rejected or unanswered requests

If no positive or negative response is provided to the applicant within the time limits set out in Law No. 4982, the request shall be deemed rejected after thirty days, pursuant to Article 10 of the Administrative Procedure Law No. 2577.”
(Board of Review of Access to Information)

By law, a response to your freedom of information request must be provided within 15 working days. If the institution you applied to informs you in writing that your request has been forwarded to another institution, this period may be extended once, up to 30 days.

If you do not receive any response within 30 days, your request is considered to have been implicitly rejected, and you gain the right to appeal.

You also have the right to appeal if the response you receive is irrelevant to your question or incomplete.

There are two ways to appeal: you may either initiate legal proceedings by filing a lawsuit, or you may submit an objection to the Board of Review of Access to Information (BEDK). If you choose to appeal to the Board, your right to file a lawsuit is preserved, and you may still pursue legal action afterward. This is because applying to the Board suspends the time limit for initiating proceedings before the administrative courts.

Appeal to the (BEDK)

To file an appeal with the Board of Review of Access to Information (BEDK), you can complete the application form available on the e-Government portal at the following link:

<https://www.turkiye.gov.tr/bilgi-edinme-degerlendirme-kuruluna-itiraz-basvurusu-6595>

You have 15 days (not 15 working days) to submit your appeal to BEDK, starting from the date you receive the rejection decision.



You can download a sample appeal petition by scanning the QR code.

If no response is provided, this 15-day period begins after 30 days, as the request is considered implicitly rejected.

The Board is required to respond to your appeal within 30 days. If BEDK does not respond within 30 days or rejects your appeal, a 60-day period to file a lawsuit begins. In other words, you have the right to initiate legal proceedings within 60 days from the date the Board's decision is notified to you, or from the date of implicit rejection (30 days after your application).

To avoid loss of rights, it is crucial to carefully calculate deadlines. The time that passes before applying to BEDK is taken into account within the overall 60-day period for filing a lawsuit.

According to the Board's rules of procedure, a second appeal submitted by the same person based on the same factual and legal grounds will be rejected without examination. However, if your appeal is upheld and deficiencies, falsification, or similar issues are identified in the information or documents provided by the institution, you may apply to the Board again.

Appeal through litigation

Following the rejection of your request, you may file an annulment case before an administrative court within 60 days from the date the rejection decision is formally notified to you.

You may also file a case within 60 days from the end of the legal response period (normally 15 working days, or 30 working days if extended), if no response is provided.



You can download a sample lawsuit petition by scanning the QR code.

There are two ways to initiate legal proceedings:

>> Filing a case online: To file a case digitally, log in to the e-Government portal and access the National Judiciary Informatics System (UYAP) Citizen Portal: <https://vatandas.uyap.gov.tr>

Through the “file a lawsuit” option, you can select the relevant administrative court and upload your petition. When filing via UYAP, it is important to comply with procedural rules and ensure that you have a valid electronic signature. You should also consider including requests such as a hearing and/or a stay of execution, as these may have implications for court fees, procedural requirements, and the course of the proceedings. If you are filing a case against a BEDK decision, it is important to note that the competent administrative court is located in Ankara.

>> Filing a case in person: Alternatively, you may file your case by going to the courthouse in person. Submit your petition, addressed to the competent administrative court, to the court’s filing office. After paying the required fees and expenses, you will be issued a case file number.

Application Process to the Ombudsman Institution

Another avenue available in disputes related to the right to freedom of information is the Ombudsman Institution (KDK) (<https://ombudsman.gov.tr/>).

You may submit your application to the Ombudsman free of charge, either before initiating administrative court proceedings or while such proceedings are ongoing.

The key point to note is that the Ombudsman issues recommendatory decisions only. These decisions are not legally binding; however, they are valuable in that they can create political and administrative pressure on public institutions.

You can submit your application digitally via the following link: <https://ebasvuru.ombudsman.gov.tr/>

We also recommend reviewing the Ombudsman's detailed guide, which explains key issues such as how to apply and what types of complaints can be submitted: <https://ombudsman.gov.tr/BizeHangiKonulardaBasvurabilirsiniz>

Structure of CİMER and BEDK

CİMER is a centralized application system covering all public institutions and operates under the Presidency's Directorate of Communications. The Directorate coordinates the process by ensuring that applications are received in accordance with procedural requirements and forwarded to the relevant institutions. It also sets standards for response times and formats. However, it does not make substantive decisions regarding the content of applications.

The body responsible for handling appeals related to freedom of information requests is the Board of Review of Access to Information (BEDK). As noted above, applying to BEDK is not mandatory for rejected requests; applicants may instead choose to go directly to court.

BEDK consists of nine members, all of whom are appointed by the President. The members serve four-year terms.

The Board convenes at least once a month or when necessary upon the call of its chair. When deemed appropriate, the chair may invite representatives from relevant ministries, public institutions, and civil society organizations to attend meetings and provide information.



IPI Freedom of Information Platform

The IPI FoI Platform was launched in January 2025 to track freedom of information requests submitted by stakeholders such as journalists, civil society organizations, activists, academics, and lawyers.

The platform enables us to collect critical data, including response times, the quality of responses, and rejection rates. We regularly publish this data on our website, providing transparent and periodic analyses of the actual state of FoI requests — beyond official claims that requests are “regularly answered.”

These data are based solely on requests recorded on the IPI Freedom of Information Platform and do not reflect the overall outcomes of the official FoI system.



User Guide for the IPI Fol Platform

To use the platform, you must first register at bilgiedin.ipi.media. Once your registration is approved, you can navigate to the “Freedom of Information Requests” page in the left-hand menu and click the “Add new request” button in the top right corner to enter the details of your application.

Please note: You must first submit your request to the relevant public institution. The platform is not designed for submitting Fol requests, but for recording and monitoring the requests you have already made.

If you receive a response, you can add its details by clicking the “+” icon next to your request on the “Freedom of Information Requests” page. If your request was rejected and you filed an appeal, you can complete the appeal section on the response page. If you receive no response, you do not need to add anything — the system will automatically record your request as “unanswered.”

If you wish to upload documents to the platform, we strongly recommend that you redact all personal data (such as names, surnames, addresses, phone numbers, ID numbers, signatures, etc.) before uploading. Our aim is to build a public repository of information that is relevant to the public interest. For example, if you receive a document such as a map of bicycle lanes in Türkiye in response to your request, you may upload it to the platform. We may then publish it on our website for public benefit, provided that no personal data is visible.

IPI FoI Platform database



Number of total FoI requests

427

Number of FoI requests responded to

208

Number of FoI requests rejected

116

Number of partly responded requests

52

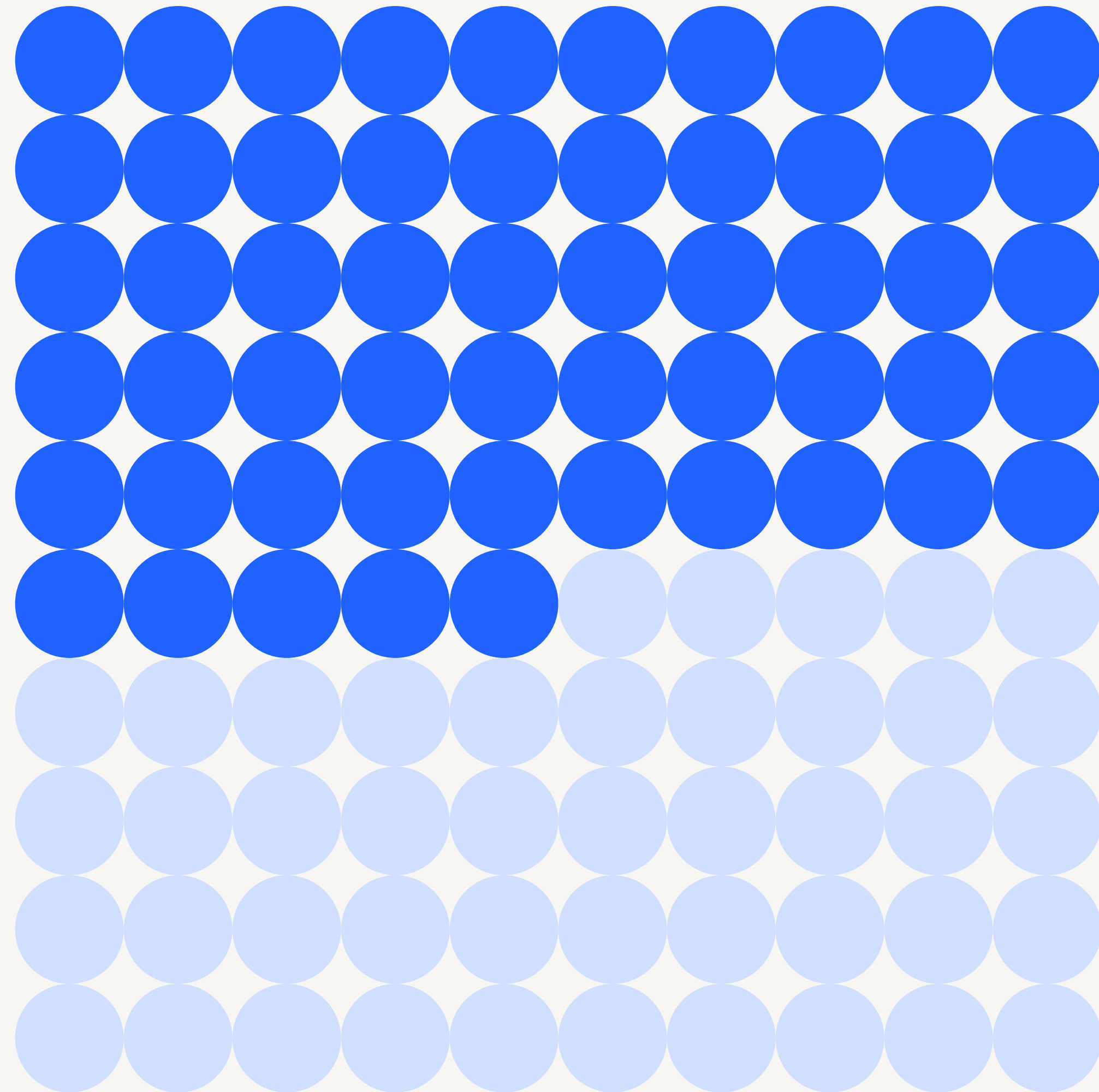
Number of pending FoI Requests

51

Findings and assessment

The findings in this section are based on the classification of requests recorded on the platform, focusing on their response status, the content of responses, and the grounds for rejection. The percentages are calculated based on requests submitted between January 2015 and March 2026 and recorded on the platform.

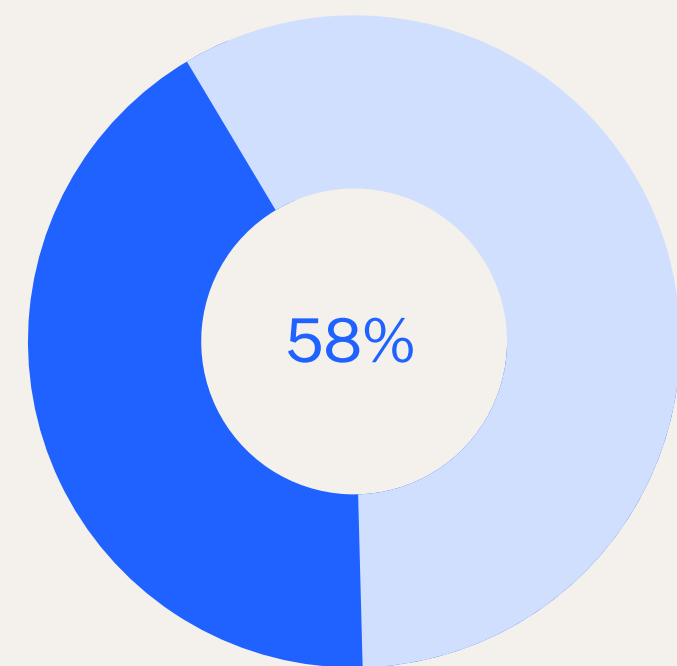




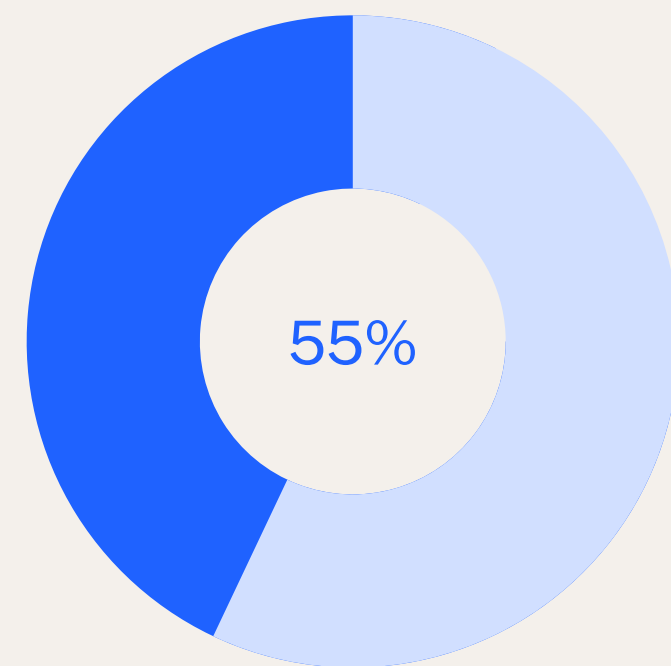
- IPI FoI Platform database

In 55% of FoI requests that received a positive, partial, or negative response, the requested information was not shared at all.

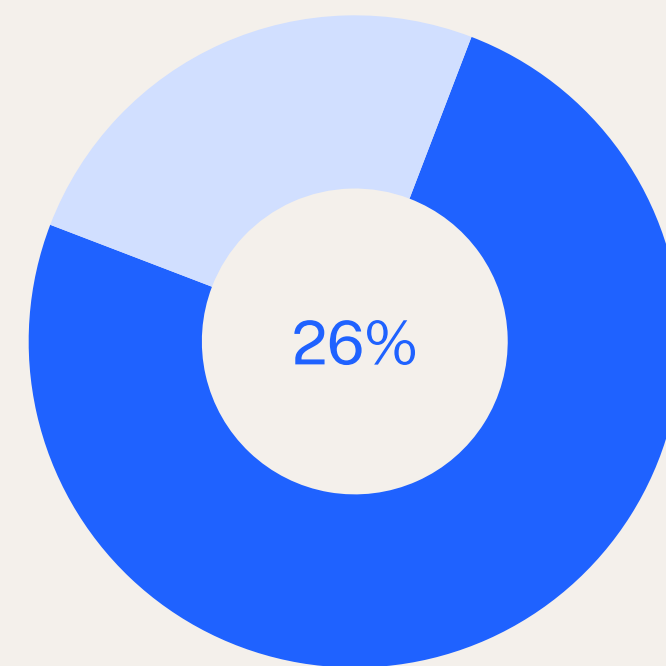
Response rates and actual access to information



58% of applicants were journalists



In 55% of requests, the requested information was not provided



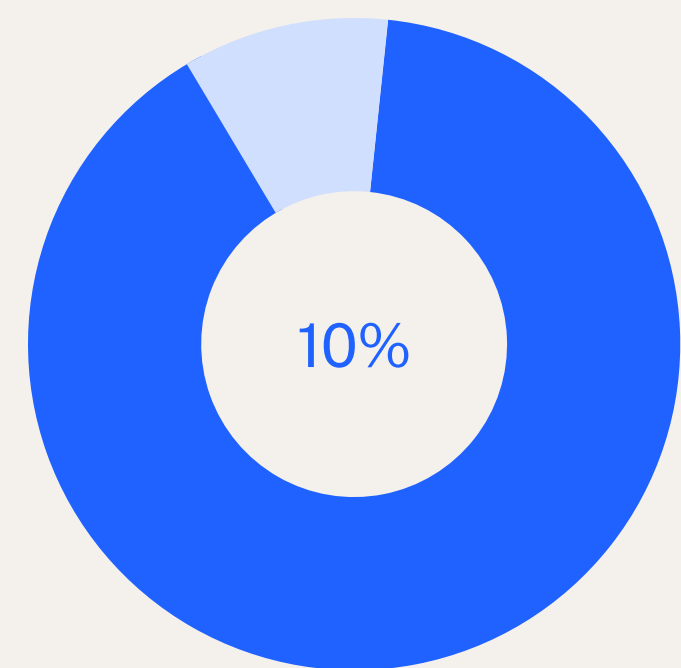
26% of requests concerned human rights

An analysis of 427 requests recorded on the IPI FoI Platform reveals significant disparities in how public institutions respond to FoI requests, both in terms of response rates and the quality of the information provided.

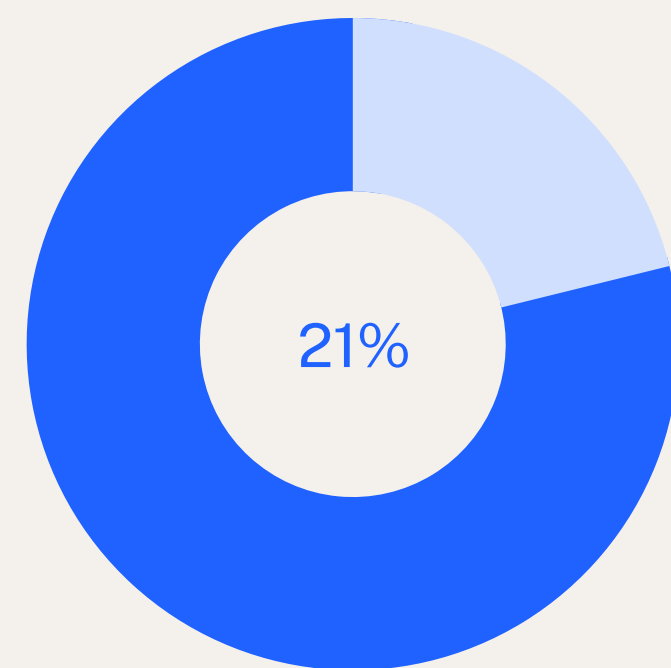
Of the 427 requests recorded on the IPI FoI Platform:

- 58% were submitted by journalists, 36% by civil society organizations, 2% by lawyers, and 4% by academics and activists.

Response rates and actual access to information



The requested information was fully provided in only 10% of responses



21% of refusals were based on “practices not concerning the public interest”

- 49% received a response, 12% received partial responses (only some questions were answered), 27% were rejected, and 12% remained unanswered.
- More than half of all requests were submitted either directly to the Ministry of Justice or via CIMER. The most common subject areas were human rights (26%), accountability and transparency (25%), and environment and climate (7%).
- Among those who received a response — whether positive, partial, or negative — 57% were journalists, 39% were civil society organizations, and the remaining 4% were lawyers and activists.
- In 55% of cases where a response (positive, partial, or negative) was provided, the requested information was not shared at all. In 17% of responses, less than half of the requested information was provided. In 13%, only half of the requested information was provided. In 5%, most of the information was provided, although some parts were missing. Fully comprehensive responses containing all requested information were limited to just 10%.
- The most common grounds cited for rejecting requests were: “not of public interest” (21%), “information already published or disclosed” (16%), and “requires separate or special effort” (13%).

Systematic use of grounds for rejection

Grounds for rejection are defined as exceptions under the Law on the Right to Information. However, platform data shows that these exceptions are applied broadly and systematically in practice.

In particular, the justification of “requiring separate or special effort” (13%), despite being an exceptional provision, has become one of the most frequently used grounds for rejection. This indicates a tendency among public institutions to reject requests rather than share existing data.

Platform data on rejection grounds also points to another significant issue. An analysis of requests shows that applicants predominantly request anonymous, aggregated, and publicly relevant data. These requests do not concern private information about individuals, companies, or institutions; rather, they relate to statistical and institutional data that public bodies are expected to produce and archive as part of their core functions.

Despite this, such requests are frequently rejected on the grounds of “confidential information” or “commercial secrecy.” This suggests that exceptions defined in the law are being applied beyond their intended scope and are increasingly used as tools to restrict access to information.

Similarly, the justification of “requiring separate or special effort” is used even for basic data that institutions are expected to already possess. Public institutions are expected to regularly produce, record, and archive data related to their areas of responsibility in a manner that allows for sharing when necessary. The use of this exception in such cases indicates that it has moved beyond its intended purpose and is being applied as a systematic ground for rejection.

A striking example of this practice can be seen in a freedom of information request submitted by journalist Elif İnce to the Ministry of Health in 2020. İnce requested daily COVID-19 case and death numbers for specific date ranges in the provinces of Gaziantep, Rize, and Batman. The Ministry rejected the request

on the grounds that it would “require separate and special effort.” However, following legal action by İnce, the court ruled that the requested data should already exist within the scope of the Ministry’s core activities and that withholding it was unlawful. The court explicitly stated that the data in question involved only simple aggregation and could not be considered as requiring special effort. Despite the final court ruling and a recommendation by the Ombudsman Institution, the requested data was still not disclosed to the applicant. This case illustrates how broadly the “special effort” exception can be interpreted and how access to information may still be denied even after judicial decisions. Platform data also shows that the justification of “information already published” can be used in problematic ways. In some cases, institutions reject requests on this basis even when the information, although previously published, is no longer accessible or has been removed from official websites. This results in a situation where information that is effectively inaccessible is treated as if it were available, thereby restricting access.

Requests that are technically answered but do not provide the requested information

Platform data shows that in a significant number of Fol requests, public institutions provide responses in a formal sense, but these responses fail to grant access to the requested information. While such replies create the impression that the request has not been formally rejected, they effectively prevent the applicant from obtaining the information.

One of the most common practices in this regard is for institutions to redirect applicants to another institution instead of providing a substantive response. In requests submitted via CIMER, the system is designed to automatically forward applications to the relevant institution and inform the applicant accordingly. However, in some cases recorded on the platform, institutions responded simply by stating, “you may direct this question to the relevant institution,” instead of forwarding the request through the system. Such responses do not contribute to resolving the request and instead force applicants to restart the process, thereby delaying access to information.

Similarly, in some cases institutions provided only general and superficial explanations instead of the requested data. For example, when specific datasets were requested, institutions sometimes responded by referring to general legal provisions or by providing information unrelated to the request. In other instances, requests containing multiple questions were only partially answered, with some questions left entirely unanswered.

Platform data also reveals more problematic patterns regarding the quality of responses. In some cases, the applicant's question was copied and returned verbatim as the response, without any substantive evaluation. Such practices indicate that the request was not genuinely assessed and that the response process was carried out only as a formality.

Another notable finding is that some institutions provide general and superficial responses even to questions directly related to their own mandates and legal frameworks, without supplying the specific information requested. In certain cases, responses contained generic and standardized language suggesting that they may have been generated using automated tools or artificial intelligence systems. These types of responses not only fail to provide access to the requested information but also indicate a lack of due diligence in the institutional handling of FoI requests.

Taken together, these examples point to a pattern in which the right to information is fulfilled only in a formal sense, while applicants are effectively denied access to the information they seek.

Current challenges through case examples

In this section, we spoke with journalists, civil society organizations, and members of parliament to hear about the challenges they faced regarding freedom of information requests and/or written parliamentary questions.



Ahmet Kavruk, CSO Rep.

The response received by Ahmet Kavruk, who submitted his request through the IPI Freedom of Information Platform, appears to have been generated using artificial intelligence. Kavruk had asked the Ministry of Youth and Sports about the legal framework governing the establishment and dissolution of sports federations in Türkiye.

The reply included phrases such as “I have summarized how the process should work for you” and “...current legal texts should be checked,” along with emojis and an invalid link.

This example demonstrates that responses to freedom of information requests can be problematic not only in terms of content, but also in their preparation and level of institutional seriousness. Instead of providing the specific legal information requested, the applicant was given a generic and directive text of unclear accuracy and origin, undermining the very purpose of the right to access information.



T.C. Gençlik ve Spor Bakanlığı'na

4982 sayılı Bilgi Edinme Hakkı Kanunu kapsamında, Türkiye'de spor federasyonlarının açılma ve kapatılma süreçlerine ilişkin bilgi talep ediyorum.

Bu kapsamda:

- 1) Yeni bir spor federasyonunun kurulabilmesi için aranan yasal, idari ve mali şartlar nelerdir?
- 2) Bir federasyonun kapatılmasına karar verilmesi hangi koşullarda mümkündür ve bu süreç nasıl işletilmektedir?
- 3) Son on yıl içerisinde açılan ve kapatılan federasyonlar varsa sayıları nedir?

Gereğini arz ederim.

Saygılarımla,

Ahmet Kavruk's
Fol request

The response by CİMER

Cevaplar:

Cevap: GENÇLİK VE SPOR BAKANLIĞI > SPOR FEDERASYONLARI DAİRE BAŞKANLIĞI (06.11.2025 14:39)

Türkiye'de bir spor federasyonu kurmak için aşağıdaki başlıca hukuki ve idari aşamaların dikkate alınması gerekir. Özellikle senin için, eğitim/spor programları çerçevesinde kullanılacak "federasyon" düzeyinde bir kuruluşun nasıl olması gerektiğini özetledim – projenin ölçeği daha küçük olabilir, ama aşağıdakiler genel süreç için yol gösterici olacaktır.

🎯 Ana Çerçeve

Gençlik ve Spor Bakanlığı (GSB) ve bağlı kuruluşları spor federasyonlarını denetler ve kuruluşlarını düzenleyen mevzuat vardır. Spor Hizmetleri Genel Müdürlüğü

2022'de çıkarılan Spor Kulüpleri ve Spor Federasyonları Kanunu "spor federasyonlarının kuruluşu, organları, gelir-giderleri" gibi hususları düzenleyen temel kanundur. glocalas.com.tr

Federasyon statüsünde bir yapı için "üst kuruluş / dernek federasyonu" gibi bir yapıdan farklı olarak, spor dallarının ulusal çatı kuruluşu olması gibi özel koşullar söz konusu olabilir.

✅ Gerekli Şartlar ve Aşamalar

Aşağıda federasyon kurulurken karşılaşılan genel şartlar yer alıyor:

Kurucu yapı

Aynı ya da benzer spor dalı için faaliyet gösteren en az beş dernek bir araya gelerek federasyon kurabilir. Net Danışmanlık

Çözüm Dernek Danışmanlığı

Bu derneklerin tüzüklerinde üst kuruluş olarak "federasyon kurulabilir" ifadesi yer almalı. Çözüm Dernek Danışmanlığı

Tüzük ve kuruluş bildirim

Federasyonun bir "ana statüsü/tüzüğü" hazırlanmalı, yönetim organları, üyelik kriterleri, delegeler, genel kurul gibi usuller netleştirilmiş olmalı.

Spor Hizmetleri Genel Müdürlüğü

Kurucular derneklerin yetkili temsilcileri tarafından imzalanmış "Kuruluş Bildirimi" hazırlanmalı ve ilgili mülki idareye başvurulmalıdır. Net Danışmanlık

Başvuru ve tescil

Federasyonun kurulacağı ildeki mülki idare amirliği (valilik) ya da ilgili daireye başvuru yapılır. Evraklar incelenir.

Başvurunun ardından federasyon tüzel kişilik kazanır.

Mevzuata uygunluk

Kuruluş, 7405 sayılı Kanun, Spor Federasyonları Yönetmeliği gibi ilgili düzenlemelere uygun olmalıdır. Spor Hizmetleri Genel Müdürlüğü

Federasyon başkan adayları için bazı şartlar olması mümkündür (örneğin federasyon ana statüsünde belirtilmiş)

⚠ Dikkat Edilmesi Gereken Hususlar

Spor federasyonu kurarken "gerçek spor dalı ve faaliyet" olması önemli: Eğitim-spor amaçlı bir federasyon mu yoksa amatör spor kulüplerini birleştiren yapısal bir federasyon mu olacağına karar verilmeli.

Federasyon statüsünün getirdiği sorumluluklar (yönetim kurulu, denetim kurulu, genel kurul, delegeler) vardır. Ana statüde bu yapı detaylandırılmıştır. Spor Hizmetleri Genel Müdürlüğü

Eğer projen "yerel", "eğitsel" veya "kulüp düzeyindeki" bir yapıysa, "federasyon" yerine "dernek", "kurul" gibi daha uygun statüleri düşünmek gerekebilir; federasyon kurmak daha üst düzey bir yapı gerektirir.

Süreç içinde mevzuat değişiklikleri olabilir; bu nedenle güncel hukuki metinler kontrol edilmeli.

✓ Cevabı Değerlendir

Doğu Eroğlu, Journalist



In 2019, journalist Doğu Eroğlu submitted an FoI request regarding the public health impacts of facilities emitting coal dust waste in Dilovası, Kocaeli. Based on field observations indicating an increase in respiratory diseases, particularly among children, Eroğlu requested anonymized and statistical data, including annual figures on outpatient treatments and hospitalizations related to asthma, COPD, and other respiratory illnesses. The requested information did not concern individual health records but rather anonymized data that public institutions are expected to include in their activity reports.

Doğu Eroğlu, Journalist

The application process encountered obstacles at multiple stages. First, the request submitted via CİMER yielded no result. Subsequently, the Kocaeli Governorship required that the request be submitted physically with a handwritten signature. After Eroğlu complied with this requirement, an official from the Provincial Health Directorate called him and stated that the requested information could not be provided on the grounds that it constituted “personal data.”

Despite Eroğlu clarifying that he had requested anonymized and aggregated data, he reports that he was verbally threatened and insulted during the call. The request was nevertheless formally rejected on the grounds that it contained “personal data” (Article 21). Eroğlu’s appeal to the Board of Review of Access to Information (BEDK) was also rejected on the same basis.

The cited justification is intended to prevent the disclosure of information that would infringe upon personal privacy, such as individual health data. However, since Eroğlu’s request concerned anonymized and statistical data rather than personal records, the legal basis for applying this provision appears questionable.

Eroğlu’s experience also highlights a broader perception among journalists: that FoI requests are often not seen as an effective tool for accessing information, but rather as a procedure expected to result in rejection from the outset. As Eroğlu puts it, “nine out of ten requests are rejected.” This situation has led FoI requests to lose their function as a strategic tool — both in terms of content and timing — and instead become, in many cases, a mere formality.

Emre Kızılkaya, Journalist



In December 2025, journalist Emre Kızılkaya submitted an FoI request to TÜBİTAK's Informatics and Information Security Advanced Technologies Research Center (BİLGEM), asking for data that had been announced as being shared with two private companies under the Price Open Data Platform to be made publicly available or provided directly to him. While TÜBİTAK confirmed that the data was being shared with the two companies in real time, it did not disclose the data to the public.

In a second request, Kızılkaya asked, within the scope of the agreements governing this data-sharing arrangement, how much the companies were paying to the public for access to specific datasets.

Emre Kızılkaya, Journalist

TÜBİTAK rejected this second request, citing Articles 17 (“the country’s economic interests”) and 23 (“commercial secret”) of Law No. 4982. However, the rejection response did not explain how the requested information would harm the country’s economic interests or in what way it constituted a commercial secret. In other words, the institution merely referenced legal provisions without demonstrating why they applied in this specific case.

This example highlights two key issues identified in the report. First, data of a public nature is shared not with the public, but only with selected private companies.

Second, when questions are raised about the scope and financial terms of such data-sharing arrangements, institutions rely on exceptional grounds such as “commercial secrecy” and “the country’s economic interests” to refuse disclosure.

However, the information requested in this case does not concern a company’s proprietary trade secrets. Rather, it relates to matters of clear public interest: under what conditions and at what cost a public institution shares public data with private entities.

As Kızılkaya also emphasized in his appeal, the core financial elements of public contracts and information on how public data is shared, including with whom and under what conditions, should be accessible to the public in the interest of democratic oversight and accountability. This case therefore stands as a striking example of how exception clauses, when not applied in a concrete and reasoned manner, can become a generalized tool for restricting access to information.

Burak Dalgin, Member of Parliament



A written parliamentary question submitted by Balıkesir MP Burak Dalgin to the Minister of Industry and Technology points to a similar issue regarding the quality of responses to information requests. In July 2025, Dalgin submitted a series of detailed questions concerning investment incentives and customs duty exemptions granted to the Chinese automotive company BYD. The questions addressed, among other things, the current stage of the factory planned in Manisa, the expected timeline for its operation, why customs duty exemptions were not tied to specific investment and employment conditions, whether any guarantees were secured in case the investment did not materialize, and the overall scope of the incentives granted.

Details of his question: <https://x.com/bdalgin/status/1946138116948979982>

Burak Dalgın, Milletvekili

YAZILI SORU ÖNERGESİ BİLGİLERİ	
	Yazılı Soru Önergesinin Metni
Dönemi ve Yasama Yılı	28 / 3
Esas Numarası	7 / 31091
Başkanlığa Geliş Tarihi	18.07.2025
Önergenin Özeti	Çin menşeli bir otomotiv firmasının Manisa'da kurmayı taahhüt ettiği fabrikanın akıbetine ilişkin
Önergenin Sahibi	Balıkesir Milletvekili Burak DALGIN
Önergenin Muhatabı	Sanayi Ve Teknoloji Bakanı Mehmet Fatih KACIR
Önergeyi Cevaplayan	Sanayi Ve Teknoloji Bakanı Mehmet Fatih KACIR
Son Durumu	Cevaplandı

However, the written response provided by the Ministry of Industry and Technology did not directly address any of these questions. Instead, it consisted of general statements about the importance of the automotive sector for Türkiye's economy, the transition to electric vehicles, the TOGG project, and the strategic value of the BYD investment. No concrete timeline, data, explanation, or specific information related to the questions was provided.

Read the response here: <https://x.com/bdalgin/status/1979225307975504185>

Despite this, the parliamentary question was recorded as “answered” on the official website of the Grand National Assembly of Türkiye. This reflects a pattern also observed in Fol requests analyzed in this report: a response being provided in a formal sense does not necessarily mean that the requested information has been delivered. In other words, requests and parliamentary questions that remain unanswered in substance are still considered formally answered.

Third Sector Foundation of Türkiye (TÜSEV)

As part of its Fol-focused work on the state of civil society in Türkiye, the Third Sector Foundation of Türkiye (TÜSEV) submitted Fol requests containing more than 100 questions to 23 public institutions – mostly ministries – between April and May 2025.

In responses to half of these requests, institutions cited legal grounds for refusing to provide the requested information. While the Ministry of Family and Social Services and the Ministry of Youth and Sports provided partial responses as exceptions, the majority of requests did not yield meaningful or usable information; they were either rejected or left unanswered. The most commonly cited ground for rejection was that the request “required separate or special effort.”



Third Sector Foundation of Türkiye (TÜSEV)

In one case, a ministry refused to disclose which civil society organizations had been consulted, citing Article 9 and claiming that the information was confidential. In another case, a ministry rejected a request concerning tax incentives, the total amount of donations deducted from tax bases within a given year, and the annual income of associations and foundations from passive investments and economic enterprises, citing Article 23 and classifying the information as a commercial secret.

“The fact that even data of public interest and statistical nature is withheld on exceptional grounds, and that requests are systematically rejected on the basis that they ‘require special effort,’ has a limiting effect on the exercise of this right.” — TÜSEV

Türkiye Üçüncü Sektör Vakfı (TÜSEV)

According to data shared by TÜSEV, over the past four years:

- The Ministry of Family and Social Policies was the institution that most frequently responded to their requests,
- The Ministry of Youth and Sports and the Ministry of Labour and Social Security provided partial responses,
- Institutions holding critical data for monitoring purposes, such as the Ministry of Justice, the General Directorate of Civil Society Relations under the Ministry of Interior, and the General Directorate of Security, regularly rejected data requests,
- The General Directorate of Foundations under the Ministry of Culture and Tourism did not provide any responses, whether positive or negative.

Policy recommendations

Platform data and case examples show that, despite its legal framework, the right to FoI in Türkiye faces significant limitations in practice. This demonstrates that existing legal provisions alone are insufficient and that institutional practices and oversight mechanisms must be strengthened to ensure the effective exercise of this right. For FoI to function not merely as a theoretical entitlement but as an accessible and effective tool in practice, improvements are needed both in administrative procedures and in mechanisms for seeking redress.



Policy recommendations

“The main issue here stems not from legal regulations but from practice. While the law is clear enough to leave little room for interpretation, the content of rejection responses points to a lack of recognition and value attributed to the right to information in practice.”

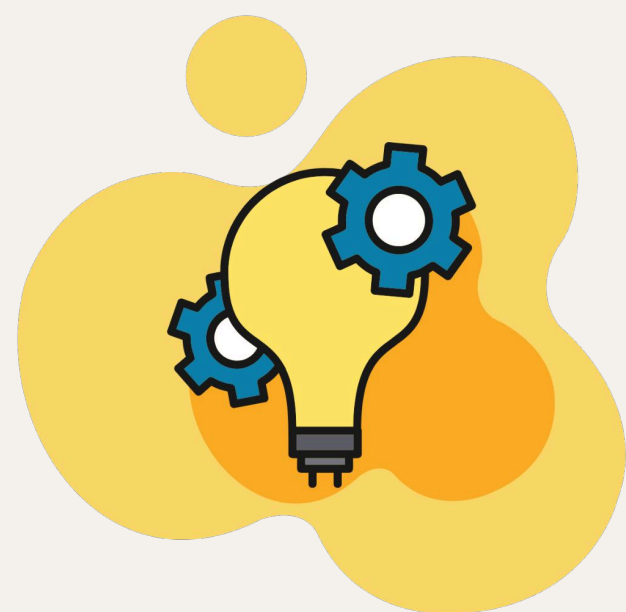
Gökhan Tekşen

Platform data supports this assessment. Although institutions often respond to requests, a significant portion of these responses either fail to provide the requested information or rely on exception grounds to justify refusal. One of the key priorities, therefore, is to foster an institutional approach in which public bodies view Fol not merely as an administrative obligation, but as a core mechanism of public accountability.

Strengthening the role of the Board of Review of Access to Information (BEDK) is also critical to ensuring that Fol requests are effectively resolved. At present, the Board’s decisions are not always implemented, and in some cases even final decisions are not enforced by the administration. This prolongs the process of seeking remedies and weakens the effective exercise of the right to Fol.

Policy recommendations

“Deadlines should be set for the implementation of the Board’s decisions, and failure to comply should be subject to specific sanctions (disciplinary measures).” — Gökhan Tekşen



Another major factor limiting the effective use of Fol is the cost and duration of judicial proceedings. The process of filing a lawsuit — considering court fees, expenses, and potential legal fees — can be prohibitive for many applicants. As Tekşen highlights, “Filing a case before administrative courts has reached a point where, due to costs and the risk of paying the opposing party’s legal fees in case of loss, it undermines the very essence of the right to seek justice.” Making litigation processes more accessible and reducing the financial burden on applicants is therefore essential.

At the same time, one of the most effective ways to reduce the number of Fol requests and facilitate access to information is for public institutions to proactively disclose data. Platform data shows that a large proportion of requests concern statistical and institutional data that public bodies are already expected to produce on a regular basis.

Policy recommendations

Publishing such data proactively would both reduce the need for FoI requests and enhance transparency in public administration. Expanding open data practices could transform transparency from a reactive, request-based process into a continuous and accessible system.



Finally, strengthening institutional capacity and awareness is essential for the effective implementation of FoI. Enhancing the technical and legal capacity of units responsible for handling FoI requests would contribute to more timely and higher-quality responses. At the same time, increasing institutional awareness of the role of FoI within a democratic system would support its more effective application in practice.

The effective implementation of FoI is critical not only for meeting individual information requests, but also for ensuring transparency, accountability, and democratic oversight in public administration. For this reason, administrative and structural improvements in the implementation of this right will also play an important role in strengthening public trust in governance.

Conclusion

Conclusion

The analysis of data from the IPI FoI Platform shows that, although the right to FoI is legally recognized in Türkiye, it faces significant limitations in practice.

Public institutions often respond to requests; however, a substantial portion of these responses fail to provide the requested information. The broad use of exception grounds and the fact that some requests remain unanswered make it difficult to effectively exercise the right to FoI.

FoI is a fundamental tool for ensuring transparency and accountability in public administration. Its effective implementation is critical both for individuals' access to information and for the democratic oversight of public institutions.

By monitoring practices in this field, the IPI FoI Platform contributes to strengthening transparency. Achieving meaningful progress will require both improvements in institutional practices and the strengthening of transparency mechanisms.



IPI Turkey Report
March 2026

Prepared by: IPI

Editors: Damla Tarhan, Emre İlkan Saklıca, Ata Türkoğlu

Design: Damla Tarhan

Contributors: Burak Dalgın, Av. Gökhan Tekşen, Emre Kızılkaya, Doğu Eroğlu, Ahmet Kavruk, Polat Yamaner and TÜSEV



Funded by
the European Union

This report was produced as part of IPI's project "Strengthening Capacity for Freedom of Information (FoI) and Data Activism in Türkiye's Civil Society," with the financial support of the European Union. Its contents are the sole responsibility of the International Press Institute and do not necessarily reflect the views of the European Union.

Published by: International Press Institute (IPI)
Spiegelgasse 2/29, 1010 Vienna, Austria
+ 43 1 5129011 | info@ipi.media | ipi.media