

FREE ACCESS TO PUBLIC INFORMATION IN LIGHT OF RECENT CJEU CASE LAW

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Abstract

Access to public information is a constitutional right and is internationally recognized. The state guarantees applicants the right to free access to public information, establishing the conditions and procedures to be followed under the law, as well as the remedies available in the event of a refusal. Over the years, the increased interest in the environment has led to requests to public institutions for information on the environment. Complaints made by anonymous applicants or applicants using pseudonyms pose challenges for the authorities in many respects, including the complainant's credibility and the inability to provide a response. From this perspective, the subject matter is topical and of general interest, concerning not only the scientific community but also the general public, who may find themselves in a situation where they need to submit a request for public information and must be familiar with the procedure to be followed. In this background, the scope of this study is to examine the issue of free access to public information from a legal perspective, through the lens of the CJEU's recent case law regarding the requirement to identify the applicant in requests for information on the environment. The findings of the study highlight the importance of proper conduct when submitting requests to public authorities, as well as the fact that compliance with the law on access to public information is required to all subjects of law, whether individuals or public authorities.

Keywords: free access to public information, CJEU, public authorities, law, applicant.

1. Introduction

In both domestic and international legal instruments¹, states have sought to develop legislation tailored to the social needs of their citizens. For example, we can find international treaties, declarations, regulations, and directives, all of which are intended to foster cooperation among states. For this reason, based on the theory of the social contract, people are increasingly interested in learning as much as possible on how the authorities carry out their duties and comply with the law, based on the idea that public authorities exist to serve the citizen.

The revised Constitution of Romania provides the following in art. 1 para. (5): "In Romania, the observance of the Constitution, its supremacy and the laws shall be mandatory". Therefore, violations of the law and fundamental rights result in the punishment of those responsible, in accordance with the forms of legal liability provided for by law. The denial of access to public information may result in a lawsuit² and compensation for damage caused by such denial. French doctrine has held that "The possibility of citizens to obtain compensation for damage attributable to the government is an essential aspect of the rule of law; given its practical significance, the entire theory of liability reflects a certain form of civilization³". In order to avoid a potential litigation, the law must be accessible to the litigant but also predictable in terms of its effects; in other words, by reading the law, the public can easily determine how to proceed in order to obtain public information. Furthermore, "law is connected to history and social environment"⁴.

In order to achieve the research scope, the paper is structured around three pillars: doctrine, legislation, and a case study. The most interesting part of the paperwork is the final section where a CJEU ruling is analyzed, namely case „Coillte” which examines the issue of requests made by anonymous applicants or applicants using pseudonyms, specifically whether or not an applicant must identify himself/herself when submitting a request

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¹ ["States are those engaged in international relations, but not in any capacity, but in the capacity of legally equal subjects of international law"] – Roxana-Mariana Popescu, Drept internațional public (International public law). Bucharest: Universul Juridic Publishing House, 2023, p. 9.

² These are administrative litigation cases and do not involve the review of the constitutionality of laws. About the first constitutional review of laws in Romania, see Cornelia Ene-Dinu, Istoria statului și dreptului românesc (History of Romanian state and law), Universul Juridic Publishing House, Bucharest, 2020, pp. 265-266.

³ Jean Rivero, Jean Waline, Droit administratif, 21^e édition, Dalloz, Paris, 2006, p.403.

⁴ Elena Anghel, Analysis of the origin and basis of custom, as a source of law in International Journal of Legal and Social Order, 4(1):12, 2024; DOI: <https://doi.org/10.55516/ijlso.v4i1.211>, visited on 10.01.2026.

in the public interest. The research methods used in the paperwork are those established in legal research, as outlined in the relevant doctrine⁵.

2. The legal framework governing public information - A brief overview

At the national level, Article 31 of the revised Constitution governs the right to information, which provides in paragraph (1): „A person's right of access to any information of public interest shall not be restricted”. At the same time, the right to information must not compromise measures to protect young people and national security. In implementing the constitutional provision, Law no. 544/2001 on free access to public information⁶ and Government Resolution no. 123/2002 approving the Methodological Guidelines for the Implementation of Law no. 544/2001 on free access to information of public interest, normative acts published in the Official Journal⁷, draw up the general framework governing access to public information.

The terms used by Law no. 544/2001 shall be referred to in art. 2:

- public authority⁸ and institution - any public authority or institution, as well as any autonomous agency that uses public funds and operates within the territory of Romania, in accordance with the Constitution, para. (1);
- any information concerning the activities of a public authority or resulting from such activities, regardless of the medium, form, or manner in which the information is expressed - para. (2).

According to Law no. 544/2001, every public authority and institution is required to proactively disclose certain information of public interest, such as: “normative acts governing the organization and operation of the public authority or institution; the organizational structure, the responsibilities of the departments, the operating hours, and the public reception schedule of the authority; the first and last names of the members of the public authority’s management and of the public official responsible for disseminating public information; contact data of the public authorities (name, office, telephone number, fax, email, website); financial sources, budget and balance sheet; its own programs and strategies; a list of documents of public interest; a list of the categories of documents produced or managed by the public authority; the procedure for challenging a decision made by the public authority or institution in cases where an individual considers that the right of access to the requested information of public interest has been infringed”. At the same time, the authorities are required to annually publish and update a newsletter containing the information mentioned above.

Furthermore, according to Law No. 544/2001, access to this information is provided through several channels: display at the institution’s headquarters, publication in the Official Journal (...), as well as on its own website⁹ (art. 5). Thus, “the law requires acceptance of and compliance with the prescribed conduct”¹⁰. Moreover, in recent years, public authorities have been stepping up the digitalization process¹¹ and access to information can also be obtained through various dedicated platforms. But “digitalization brings with it new issues of responsibility, legal liability, limits and respect for citizens' rights and freedoms”¹².

⁵ Nicolae Popa, (coord.), Elena Anghel, Cornelia Ene-Dinu și Laura - Cristiana Spătaru-Negură, *Teoria generală a dreptului. Caiet de seminar (General Theory of Law. Seminar Booklet)* 2nd edition. C.H.Beck Publishing House, 2017, pp.197-202; Mihai Bădescu, *Teoria generală a dreptului. Tratat (General Theory of Law. Treaty)*, Hamangiu Publishing House, Bucharest, 2025, pp.373-375.

⁶ Published in Official Journal no. 663 of 23 October 2001.

⁷ [“The Official Journal of Romania (...) represents the official “newspaper” of our state in which, in Part I, the normative acts of the central public authorities are published”] - Iulia Boghirnea, *The principle of publicity of the national normative acts. Legal effects in International Journal of Legal and Social Order*, 1(1):14, 2022; DOI: <https://doi.org/10.55516/ijlso.v1i1.60>, visited on 09.02.2026.

⁸ More information on public authorities in Marta Claudia Cliza, Constantin Claudiu Ulariu, *Drept administrativ. Ediție revizuită conform modificărilor Codului administrative (Administrative Law. Revised edition according to the amendments of the Administrative Code)*, Pro Universitaria Publishing House, Bucharest, 2021, pp.7-22 or Roxana-Mariana Popescu, *ECJ case-law on the concept of “public administration” used in article 45 paragraph (4) TFEU*, CKS eBook 2017, pp.528-532, https://cks.univnt.ro/cks_2017/CKS_2017_Articles.html, visited on 20.02.2026.

⁹ [“Globally, modern technologies have reached such a level of development that it is now almost inconceivable for people not to use a phone with internet access or a computer”] - Marta Claudia Cliza, Elena Emilia Ștefan, „Cybersecurity - theoretical approach”, *European Journal of Social Law* nr. 69, octombrie 2025, Volume LXIX, Issue 4, pp.102-109, Bibliotheca Publishing House, Târgoviște, 2025. <https://www.revueeuropeenne-du-droitsocial.ro/fr/revue.php>, visited on 02.03.2026

¹⁰ See Nicoleta Elena Hegheș, “The non - retroactivity of new legal norms-fundamental principle of law. Exceptions”, in *International Journal Of Legal And Social Order* (1):153, 2022, online <https://ijlso.ccdsara.ro/index.php/international-journal-of-legal-a/article/view/74/60>, visited on 10.02.2026.

¹¹ [“Regulating the digital sector (...) implies the formation of new paradigms in the legal area”] - Alina Conea, *Politicile Uniunii Europene [European Union Policies]*. Bucharest: Universul Juridic Publishing House, 2020, p. 11.

¹² See Elena Emilia Ștefan, “Integrity and Transparency in the Work of Public Authorities. Aspects of Comparative Public Law”, in *Juridical Tribune – Review of Comparative and International Law* 14 (4): 565, 2024, DOI: 10.62768/TBJ/2024/14/4/03, visited on 22.02.2026

With regard to access to environmental information, we refer to Government Resolution no. 878/2005 on public access to environmental information¹³ and Order no. 2715/2024¹⁴ on the approval of the Methodology for the collection, management, and public disclosure of environmental information by public authorities under the subordination, coordination, or authority of the central public authority for environmental protection. Romania adopted the Strategy for the implementation of Decision VI/8h regarding the compliance with the requirements of the Aarhus Convention¹⁵.

From the perspective of international legal instruments, these were also taken into account in this study, since “given the current background where life of every human community is closely linked to the fate of humanity as a whole, international factors cannot be neglected¹⁶”.

At the EU level, we are interested in Regulation (EC) no. 1049/2001 regarding public access to European Parliament, Council and Commission documents¹⁷. Furthermore, the “Regulation has general applicability”¹⁸. We also note Directive 2003/4/EC of the European Parliament and of the Council of 28 January 2003 on public access to environmental information and repealing Council Directive 90/313/EEC¹⁹ but also the Aarhus Convention.

The Convention on Access to Information, Public Participation in Decision-Making, and Access to Justice in Environmental Matters (Aarhus, 25 June 1998) was ratified at the national level in 2000²⁰. This is the primary international instrument to which authorities refer regarding the matters covered. The public access to documents is also provided for in the European Code of Good Administrative Behavior²¹.

3. The extent to which public authorities have implemented the provisions of Law no. 544/2001

In order to assess the implementation of Law no. 544/2001, central public authorities based in Bucharest and local public authorities, also based in Bucharest, were taken into account in accordance with the principle of representativeness.

From the perspective of central public authorities, the websites of the following institutions were examined: the Chamber of Deputies, the Constitutional Court, the Government, the President of Romania, the High Court of Cassation and Justice, the Ombudsman, the Court of Auditors, the Economic and Social Council.

We can find various details such as: public procurement, declarations of assets and interests, economic information, institutional integrity, etc. on the Chamber of Deputies’ website²² under the public information section.

On the website of the President²³ of Romania, there is a section on institutional transparency, which, in addition to applicable legislation, includes both a list of documents of public interest pursuant to Law no. 544/2001 and reports evaluating implementation. As for the Government, the website of the General Secretariat²⁴ of the Government includes the following: information on how to obtain public information, applicable regulations, procedures, forms, a newsletter, the budget, and financial statements, etc.

¹³ Published in Official Journal no. 760 of 22 August 2025.

¹⁴ Published in Official Journal no. 1251 of 12 December 2024.

¹⁵ Public information, online: <https://mmediu.ro/app/webroot/uploads/files/Strategie%20actualizata%202021.pdf>, visited on 14.01.2026.

¹⁶ Ioan Muraru (coord.), Andrei Muraru, Valentina Bărbăţeanu, Dumitru Big, Drept constituțional și instituții politice. Caiet de seminar (Constitutional law and political institutions. Seminar booklet), C.H.Beck Publishing House, Bucharest, 2020, p.2.

¹⁷ Published in the Official Journal of the European Union L 145, 31.05.2001, pp.43-48.

¹⁸ Augustin Fuerea, Manualul Uniunii Europene (The European Union Handbook) 6th edition, revised and supplemented. Bucharest: Universul Juridic Publishing House, 2010, p.141.

¹⁹ Published in the Official Journal of the European Union L 041, 14/02/2003, pp.26-32.

²⁰ Law no. 86 /2000, published in Official Journal no. 224 of 22 May 2000.

²¹ Public information, online: <https://osha.europa.eu/sites/default/files/code%20of%20good%20administrative%20behaviour%20-%20EU%20Ombudsman.pdf>, visited on 14.01.2026.

²² Public information, online: <https://www.cdep.ro/#>, visited on 03.03.2026.

²³ Public information, online: <https://www.presidency.ro/ro/administratia-prezidentiala/transparenta-institutionala?categ=1>, visited on 03.03.2026.

²⁴ Public information, online: <https://sgg.gov.ro/1/interes-public/solicitare-informatii-legislatie/> and <https://sgg.gov.ro/1/interes-public/>, visited on 03.03.2026.

In what concerns the Constitutional²⁵ Court²⁶ of Romania, the website of the authority, in the general section, includes – the list of public information, such as: public documents, the procedure for obtaining public information, transparency regarding salary-related income, integrity strategy, etc.

The website of the High Court of Cassation and Justice²⁷ has a section dedicated to public information which included information of public interest, procedures for challenging the decision, and information exempt from public access. As for information of public interest, the Court²⁸ of Auditors, also makes available for consultation certain documents, such as: reports under Law no. 544/2001, the list of documents of public interest, etc.

The Ombudsman²⁹ also has a section on its website dedicated to information of public interest, which can be found under the resources category. This section provides information such as: applicable laws and regulations, the names of officials responsible for enforcing Law no. 544/2001, a standard application form, an administrative complaint form, a list of public interest documents prepared by the Ombudsman, and the standard procedure for resolving petitions, etc.

The website of the Economic and Social Council is also very interesting³⁰, as it includes: applicable legislation, the procedure for obtaining public information, the person responsible for enforcing Law no. 544/2001, newsletter, declarations of assets and interests, budget, etc.

In what concerns local public administration, we visited the website of the General City Hall³¹ of Bucharest and discovered many interesting things. Therefore, under the public interest section on the homepage, we find, for example: petition forms, public notices, contracts entered into by the Bucharest City Hall, public procurement, public interest request forms, pending lawsuits, and the status of submitted requests, etc.

4. Case study

In recent case law of the CJEU, a judgment was issued that addressed the issue of applicants who remain anonymous or use pseudonyms in requests submitted to authorities for public environmental information. This concerns Case C-129/24, *Coillte*³² *Cuideachta Gníomhaíochta Ainmnithe*.

According to public information: “The request for a preliminary ruling concerns the interpretation of Article 2(5) of Directive 2003/4/EC of the European Parliament and of the Council of 28 January 2003 on public access to environmental information (...) read in the light of the Aarhus Convention (...). The request has been made in proceedings between *Coillte Cuideachta Gníomhaíochta Ainmnithe* (*‘Coillte’*), a commercial forestry undertaking partly owned by the Irish State, and the Commissioner for Environmental Information (Ireland) (*‘the Commissioner’*) concerning the latter’s decision finding that *Coillte* had unjustifiably treated as invalid several requests for access to environmental information³³”.

Briefly, “between 10 March and 7 June 2022, *Coillte* received 130 requests for access to environmental information. 97 of those requests originated from anonymous applicants or applicants using pseudonyms generally inspired by film characters and were presented in an identical or almost identical format, without a physical address being provided.

Taking the view that the anonymous or pseudonymized requests were not genuinely seeking to elicit environmental information, but were part of an organized campaign engaged in for questionable motives such as disrupting its operations, *Coillte* asked the applicants concerned to provide it with their current addresses and to confirm that, in those requests, they had used their real legal names. Having received no response, *Coillte*, in

²⁵ [“The essential role of the Constitutional Court is to guarantee the supremacy of the Constitution”] – Silviu Gabriel Barbu, Andrei Muraru, Valentina Bărbățeanu, *Elemente de contencios constituțional* (Contentious Constitutional Elements). Bucharest: C.H.Beck Publishing House, 2021, p.17.

²⁶ Public information, online: <https://www.ccr.ro/transparenta-institutionala/lista-informatiilor-de-interes-public/>, visited on 03.03.2026.

²⁷ Public information, online: <https://www.iccj.ro/informatii-publice/informatii-de-interes-public/>, visited on 03.03.2026.

²⁸ Public information, online: <https://www.curteadeconturi.ro/comunicare/informatii-de-interes-public>, visited on 03.03.2026.

²⁹ Public information, online: <https://avp.ro/index.php/resurse/informatii-de-interes-public/>, visited on 03.03.2026.

³⁰ Public information, online: <https://www.ces.ro/ro/informatii-publice>, visited on 03.03.2026

³¹ Public information, online: <https://www.pmb.ro/legaturi-utile/directii-pmb/menu-page/8>, visited on 03.03.2026

³² Public information, online: Case C-129/2024, *Coillte Cuideachta Gníomhaíochta Ainmnithe*: Judgement of The Court (Fifth Chamber) of 15 January 2026 (request for a preliminary ruling from the High Court-Ireland) - CoJ C, C/2026/1178, 9.3.2026, ECLI: <http://data.europa.eu/eli/C/2026/1178/oj>, visited on 10.03.2026, https://infocuria.curia.europa.eu/tabs/affair?sort=AFF_NUM-DESC&searchTerm=%22C-129%2F24%22&publishedId=C-129%2F24 visited on 10.03.2026, and Resolution <https://eur-lex.europa.eu/legal-content/RO/TXT/HTML/?uri=CELEX:62024CJ0129&qid=1773067440440> visited on 10.03.2026.

³³ *Idem*

essence, rejected the anonymized or pseudonymized requests as invalid and, thus, did not provide the environmental information requested within the period prescribed by the national legislation. The requesters concerned then requested Coillte to carry out an internal review of those rejection decisions. Coillte again asked those applicants to confirm or indicate their legal names and to provide it with their current addresses, while stating that it was not requiring them to indicate the reason for their requests for environmental information and that, unless they provided the requested confirmation, their requests for internal review would be rejected. That information not having been provided, the requests for internal review were rejected as invalid.

The rejection decisions were the subject of administrative appeals to the Commissioner. Ruling on the first 58 cases of rejection, the Commissioner found that Coillte had not been justified in treating the requests for environmental information concerned as invalid under the Irish national rules. Coillte brought an appeal against that decision before the High Court of Ireland which ruled in favor of the plaintiff and considered that the anonymized or pseudonymized requests probably originated from a single source or were part of a coordinated campaign, since they ceased abruptly at the same time. Thus, anonymity could have been used by certain applicants to abuse the procedure for access to environmental information intentionally so as to disrupt the public authorities' operations. In those circumstances the High Court decided to stay the proceedings and to refer certain questions to the Court of Justice for a preliminary ruling ³⁴ (par. 16-23).

The Court ruled as follows: "in the opinion of the CJEU, the concept of applicant within the meaning of Article 2(5) of Directive 2003/4/EC of the European Parliament and of the Council of 28 January 2003 on public access to environmental information and repealing Council Directive 90/313/EEC, read in the light of the Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters, signed in Aarhus (...), must be interpreted as meaning that it does not require a natural or legal person to be identified by his or her actual name and/or a current physical address, but does not preclude national legislation which requires such identification of the applicant, in compliance with the principles of equivalence and effectiveness³⁵.

5. Conclusions

After documenting the topic, it became clear that the research objective had been achieved. The paper addressed the issue of free access to public information from both a national and a European perspective, beginning with a presentation of the regulatory framework. The focus was largely on the issue of access to environmental information; in this regard, the paper presented a recent case pending before the CJEU that addressed the issue of requests submitted by anonymous applicants or applicants using pseudonyms, without disclosing their identity or actual address when providing the requested information.

This topic is interesting because it focuses on the obligation of authorities—as set forth in both domestic and international laws—to allow free access to public information. Therefore, as the doctrine pointed out, "the manner in which a nation is governed has constantly aroused lively disputes throughout history"³⁶.

At the same time, the study included practical research, by visiting the websites of several representative public authorities to determine whether they have fulfilled their obligations under Law no. 544/2001 on free access to public information, specifically by publishing a section entitled public information. The results of the study are satisfying, as all the institutions visited have transparently provided the information necessary for the public to understand their activities, including the procedure for obtaining public information.

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³⁴ Idem

³⁵ Idem

³⁶ Cătălin Silviu Săraru, A cross - country examination: administrative litigation in China and Romania, *Acces to Justice in Eastern Europe*, 6(3): 233, 2023, 10.33327/AJEE-18-6.3-a000313, visited on 20.02.2026.

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