

## **Update on China's Open Government Information Regulations: Surprising Public Demand Yielding Some Positive Results**

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It has been nearly two years since China's first access to information statute took effect on May 1, 2008. Reviews of how the national Regulations on Open Government Information (Regulations) have been working are often critical or skeptical, with titles like "China's Transparency is Just Thin Air"[\[1\]](#) and "China's Sham Information Disclosure Law."[\[2\]](#) Indeed, while individuals had greater luck obtaining information relating to their personal lives, government agencies have generally been reluctant to provide information on government operations and policies, and Chinese courts have frequently refused to accept lawsuits over information disclosure or have found in favor of the government.[\[3\]](#) A report card on government implementation of the Regulations conducted by an academic center at Peking University, based primarily on analyzing the timeliness and contents of the first round of annual open government information (OGI) reports, gave only 41% of provincial-level governments and 17% of central government departments a passing score.[\[4\]](#)

To be sure, substantial challenges continue to frustrate realization of the Chinese people's "right to know." These include restrictions in the language of the Regulations themselves,[\[5\]](#) conflicts with prevailing legislation like the State Secrets Law, bureaucratic unease with and confusion over how to carry them out, and lack of adequate resources to meet records management and information request demands. Moreover, the interplay between the Regulations and existing law on what kinds of lawsuits against government agencies can be entertained, as well as uncertainty about how to handle this new type of case, has left many courts looking to the Supreme People's Court for much-anticipated guidance.

Most of the implementation problems outlined above were predictable. China shares with many countries around the world a deep-rooted tradition of government secrecy. Cultivating a new culture of openness and prying open the doors to China's massive bureaucracy and its records are formidable tasks.

What was less predictable was the dynamism of the Chinese public's response to this new channel for interacting with their government, evidence of the increasing awareness of their rights and interests as citizens and taxpayers of the People's Republic. Indeed, the Regulations seem to already be having an impact within Chinese society and on government policy.

**First, a wide variety of citizens and groups across the country are using the Regulations.**

From the very first business day after the Regulations took effect, retired workers, farmers, artists, motorcyclists, dog owners and displaced homeowners, as well as professors, lawyers and other professionals, have been exercising their right to file information requests and to take the government to court if they are refused. Requested information ranges from data relating to one's own personal situation, such as retirement benefits, real estate records, compensation standards for urban redevelopment, pet and education fees, to more "public interest" topics such as details on government expenses and budgets, the unpopular re-education-through-labor system, the use of fees imposed for the construction of the controversial Three Gorges Dam and for toll roads, environmental pollution and administrative penalties.

The media, while not yet actively using the Regulations themselves, has been reporting and commenting on these cases enthusiastically, creating what was called a media "storm" in just the first week of their coming into effect and helping to educate the public about the new OGI system. In one reported case, a newspaper reporter did use the Regulations to obtain a copy of the official environmental impact assessment that approved construction of a controversial Paraxylene (PX) plant in Zhangzhou, after that plant was forced by citizen protests to relocate from Xiamen.[\[6\]](#)

China's emerging civil society has also started using the Regulations to further their policy and advocacy goals. The Chinese environmental protection community, bolstered by the environmental protection agency's quick adoption of implementing measures on environmental information disclosure that extended to polluting companies,[\[7\]](#) has been particularly well organized in using the Regulations. Within the first several months, several non-profits had issued local citizen's guides to obtaining environmental information and held workshops and training sessions about how to use the Regulations.[\[8\]](#) In September 2008, the non-profit Chinese Institute of Public & Environmental Affairs, in cooperation with the US-based Natural Resources Defense Council, filed OGI requests with 113 cities across China for a list of polluters that had been penalized by the government and a list of local complaints and how they were handled, both categories of information that environmental protection bureaus are required to disclose on their own initiative.[\[9\]](#) The published results in June 2009 revealed uneven success in obtaining information and that only four of the cities scored above 60 points out of a possible 100 points, while the average score of all 113 cities was barely over 30 points. Nonetheless, the report observed the very fact they were able to conduct the assessment, as well as the results themselves, showed the "historic progress" already made in environmental transparency and public participation in China.[\[10\]](#)

Another civic project that is tracking and rating government performance is the Peking University-based Center for Public Participation Studies and Supports, which under the leadership of Professor Wang Xixin conducted the OGI implementation evaluation mentioned above and which has formed an OGI Watch Alliance among academics around the country to

conduct more methodological and comprehensive assessments of government performance, as well as to consult with government agencies and assist citizens with access questions and issues.[\[11\]](#) The Chinese AIDS organization Aizhixing reported relative success during 2009 in obtaining requested information about government policies on protecting and caring for Chinese afflicted with HIV/AIDS, although they had to resort to administrative appeals and litigation, not always successfully, in some cases.[\[12\]](#)

Chinese lawyers are also beginning to file OGI requests in their search for evidence to support their cases. In October 2008, a lawyer brought the first OGI case accepted by a court against a provincial-level government. The case involved four residents in Anhui province who appealed against a decision ordering them to dismantle their homes to make way for a construction project. When the administrative appeal was suspended indefinitely pending internal clarification of unspecified laws and policies, and attempts to then file a lawsuit were rejected by the courts, their lawyer turned to the Regulations to seek information about what documents in the case needed to be “clarified,” and filed suit when the provincial government failed to respond to the OGI request.[\[13\]](#) The Hefei Intermediate Court five days later held the information did not need to be disclosed because it was part of an ongoing administrative appeal.[\[14\]](#) However, the lawyer later reported that, despite his defeat in court, three of the four residents’ cases had been resolved and that he was still working on the fourth.[\[15\]](#)

A well-known lawyer named Hao Jinsong unsuccessfully requested information in October 2008 from several Shanghai agencies, including the Shanghai Zhabei Public Security Bureau, on the renowned case of Yang Jia, who was given the death penalty for killing six policemen after he was allegedly beaten.[\[16\]](#) A Shanghai lawyer filed OGI requests with some 18 agencies and the Shanghai Municipal Transportation Administrative Enforcement Unit, after several drivers were allegedly entrapped in a scheme to crack down on illegal taxis.[\[17\]](#) In March 2010, Beijing lawyer Li Fanping filed an OGI request with the Shanxi Health Bureau for information responsive to parents’ unanswered complaints about deaths and illnesses of their children who received allegedly defective vaccines.[\[18\]](#) While most of these requests were apparently rejected, the lawyers were able to elicit media attention to their cases and, in some cases, obtain access to officials in the relevant government agencies and partial responses.

**Second, many Chinese citizens are obtaining information from government,** either because government is disseminating an increasingly wide range of information on its own initiative as required by the Regulations; in response to their OGI requests; or after filing administrative appeals or lawsuits.

The Regulations require government to disclose on its own initiative a broad range of information about its operations and that is deemed to be of particular interest to the public, using a variety of channels ranging from public libraries, government offices and the Internet. Even prior to the Regulations, government agencies were releasing and posting on their websites an ever increasing amount of information, although they recognize that texts of regulations and speeches by leaders are not necessarily what the people most want to know about. Now many government websites have special OGI columns, leaders’ mailboxes and chatroom capability, although a study conducted by the Chinese Academy of Social Sciences of government websites toward the end of 2009 found that many websites are not well-organized and operable.[\[19\]](#)

Nonetheless, with the government's strong backing of developing E-government, web-based information can be expected to continue to proliferate.

Under the Regulations, Chinese citizens, enterprises and other organization can also request information that has not already been disclosed, although the Regulations appear to impose a "special needs" test.[\[20\]](#) In Shanghai, which has the longest track record of reporting information disclosure performance since it passed local OGI legislation in 2004, governments at all levels and their departments handled nearly 9,400 requests in 2008, 59% of which were complied with in full and another 3.2% were fulfilled in part. Shanghai's compliance with OGI requests, which have averaged about 9,400 per year over the past five years, has reportedly been quite high, starting with 79.3% (plus 5.5% partial disclosure) in 2004 and gradually declining to the still respectable 2008 level.[\[21\]](#)

After the first year of national implementation, the annual government OGI reports required by the Regulations reflected a great diversity in the number of requests being filed and reported, from an erroneously high figure of 250,00 reported by Guangdong province's Guangzhou Municipality, which in 2003 became the first government in China to adopt OGI provisions, to lows such as only four requests recorded by nearby Foshan City. Sichuan province claimed it approved some 95% of 7,400 province-wide OGI requests, while Hunan province reported receipt of only 21 requests at the provincial level, 10 or 48% of which were complied with.[\[22\]](#)

The media also reported some successes, as well as failures, in obtaining information on request. Lawyer Wen Hongxiang, a Shenyang resident, was surprised to receive a phone call and copies of information on developers and construction projects from the Municipal Construction Commission in what was the first reported OGI request filed in Liaoning province in 2008.[\[23\]](#) Guangzhou consumer advocate Xu Dajiang had some success obtaining information about administrative penalties imposed by several bureaus as part of their law enforcement in retail outlets, although the industrial and commercial bureau refused on grounds that he was not the one punished and his request had nothing to do with his own "special needs," a refusal subsequently upheld by a district court.[\[24\]](#)

Some citizens turn to administrative appeals to seek information. For example, a group of 68 villagers whose land in Zhejiang province had been taken sought information about the approvals for the expropriation, appealing to the Ningbo City government when they received no written response from the Yu Yao government to their May 26, 2008 OGI request. Although the lower level government said it had already contacted the group's representative by phone to request additional identification and tell them to seek the information from the land resources bureau, the Ningbo government ordered it to properly handle the information request within 30 days.[\[25\]](#)

In Shanghai, over 50% of administrative appeals now involve OGI requests. In 2008, the municipal-level government handled 683 petitions for administrative reconsideration of OGI requests (predominantly for information concerning housing redevelopment displacement and land use planning). That year, only 8% of the decisions called for the government to correct its actions, down from a high of over 45% of administrative appeals decisions ordering government agencies to correct their decisions in 2004.[\[26\]](#)

Administrative litigation is another, albeit possibly even more difficult, channel for seeking to enforce requester rights to information. Shanghai reported 283 OGI-related lawsuits in 2008, the results of which were not disclosed. However, a separate study found that Shanghai plaintiffs overwhelmingly lose their OGI cases. Indeed, the only reported OGI plaintiff victory in nearly 400 lawsuits between 2004-8 was the 2008 case of Shitou Dyestuffs Company vs. Shanghai Science and Technology Commission, in which the Huangpu District Court ruled that portions of the requested information concerning certification procedures and materials on “Shanghai High Technology Enterprise” status issued since 1994 were not covered by the asserted commercial secrets and pre-decisional information exemptions and should be released.[\[27\]](#)

While requesters outside of Shanghai also typically lose their administrative appeals and lawsuits, some have prevailed against the government. The first reported court victory was a case filed by a young man, represented by the Wuhan University Center for Protecting Disadvantaged Persons, who wanted to purchase a motorcycle and requested relevant regulatory information from the Huangzhou District Transportation Bureau in Huangqu City, Hubei province. When the bureau did not respond to his written request, he filed suit and, on October 7, 2008, the Huangzhou District Court found the bureau guilty of non-performance of its statutory duty to respond and further ordered the bureau to bear the 50 yuan RMB litigation costs.[\[28\]](#) Soon thereafter, a court in scenic Hangzhou, Zhejiang province ruled, after two hearings, in favor a group of retired workers from a transportation company who had long sought a 2006 Hangzhou Government record of a meeting that discussed their stock rights. When they heard the verdict ordering the government to provide the document within 10 days, several of the elderly workers wept.[\[29\]](#)

A 27-year old computer technician in Nanyang, Hebei province gained notoriety after filing multiple information requests with 181 government departments in 2009. When he encountered refusals to disclose on different grounds, and even suspicion of “being a spy,” he pursued administrative appeals and some lawsuits, eventually obtaining some information, although not even one complete response. He explained the catalyst for his civic activism: a few years back, he became suspicious about a construction site he passed daily on his way to work and, when he asked the sales department whether they had a land certificate, they said they did but refused to show it to him. When the Land Resources Bureau also refused to show him the relevant documents, he took them to court. After the court ordered the bureau to provide a response, he was able to confirm his suspicion that they did not have the required land certificate.[\[30\]](#)

In another case, a 66-year old pig farmer won a lawsuit against the Baoding Land Resources Bureau for refusing to respond to his request for information about his land use rights. Even though the bureau finally provided a response during the course of the lawsuit, the plaintiff farmer refused to withdraw the complaint, and the court found the government defendant in violation of the Regulations for not having responded within the required 15-day time period.[\[31\]](#)

**Third, the demand for greater government disclosure is beginning to have an impact on changing government policies.** Even when specific information requests and lawsuits are not successful, they may still result in positive changes in law and policy. For example, a group of law professors at Xiangtan University in Hunan province filed a request on May 4, 2008, three days after the Regulations went into effect, for information on how toll fees charged for three bridges were being used and eventually sued for complete disclosure.[\[32\]](#) While it was never

reported whether they ultimately received all the requested information, the local government subsequently held a hearing on the toll fee issue and announced elimination of the fees as of January 1, 2009.[33]

More strikingly, OGI requests for detailed budget information, which was previously considered a state secret, have led to changes in national disclosure policy and promises quickly to revise the 1994 Budget Law itself. After the Regulations were adopted, a number of lawyers, professors and other professionals started asking local and national government for government expenses and other budget information. One, a prominent securities lawyer from Shanghai named Yan Yiming, made national headlines in January 2009 by requesting the Ministry of Finance (MOF) and National Development and Reform Commission (NDRC) to release information about the draft national budget for 2009 and China's 4 trillion RMB stimulus plan.[34] While he failed to obtain disclosure of the draft budget and all the information requested about the stimulus plan, he did elicit a public promise from the NDRC that it would publish information once the budget was approved by the National People's Congress (NPC).[35] In fact, the MOF released more detail about the approved budget than had ever been disclosed.

Still not satisfied, Yan filed a lawsuit to compel the NDRC to release more details but was ultimately defeated on appeal, when the Beijing High Court found that his case was not within the court's jurisdiction. Undaunted, Attorney Yan repeated his information disclosure requests to the MOF and NDRC in January 2010.

Meanwhile, a financial analyst with a Shenzhen private asset management company had been filing requests for budget information from multiple governments and agencies over recent years, with uneven success. He established a website to share information he did manage to obtain, called <http://www.budgetofchina.com>. In October 2009, he also made national headlines when the Guangzhou Municipal Government, which had rejected a similar request the year before, agreed to publish the budgets of 114 government departments on its website, even while the Shanghai government refused to do so on the grounds such information is a state secret.[36] A deputy to the Guangzhou Municipal People's Congress was quoted as observing, "Revealing the budget to the public is a huge and significant step on the path of government information disclosure and it will satisfy the taxpayers' right to know what their money is being used for." [37] The disparate government responses triggered heated public discussion of the public's right to know about how government is spending their money.

The debate culminated in an announcement by the NPC Standing Committee Budgetary Affairs Commission at the annual NPC meeting in March 2010 that all budgets submitted by local governments will be made public and all government budgets that are approved by the NPC will be disclosed to the public, including the budgets for ministries and departments under the State Council.[38] Guangdong subsequently became the first provincial-level government to announce it will publish its previously secret financial budget in 2010,[39] and the central government and its ministries have started to release budget information, even though the information is being criticized as too obscure or hard to understand.[40]

More broadly, information disclosure is spreading to institutions not technically covered by the Regulations, including the courts and the Party. The Supreme People's Court (SPC) has

announced, referring to the Regulations, that the courts should start making judicial proceedings, their decisions and enforcement information more open to the public.[41] The SPC now regularly publishes draft judicial interpretations for public comment, including one in November 2009 that seeks to clarify and standardize the handling of OGI cases by the courts.[42]

Even the Communist Party now talks about “open Party affairs.” It has established a press spokesperson system, has a website, <http://cpc.people.com.cn>, and refers in official pronouncements to the people’s “right to know” as a democratic right, in addition to the rights of participation, expression and supervision of government, that needs to be protected.[43] Chinese leaders endorse the concept that “power must be exercised in the sunshine” and that increased transparency enhances the people’s trust in the government.[44] Fuller and more immediate reporting of natural disasters like the Sichuan Wenchuan earthquake in the Spring of 2008, mining accidents, incidents of social unrest and public health crises also reflect growing official recognition of the need for greater transparency, even though the Party-state still struggles to control the content and presentation of shared information.

### **Important Work Still Ahead**

In the United States, the original Freedom of Information Act passed in 1966 was not widely utilized, including by the media, until major revisions in 1974. Congressional hearings on the first five years of implementation catalogued complaints about bureaucratic “foot-dragging,” abusive imposition of fees, delaying tactics, a cumbersome and costly judicial remedy, and inadequate prioritization of information disclosure. “In too many cases, information is withheld, overclassified, or otherwise hidden from the public to avoid administrative mistakes, waste of funds, or political embarrassment,” the report found.[45] Indeed, that Act has continued to be amended and further improved basically once a decade.

Similarly with China’s inaugural OGI Regulations, it is clear that much work remains to be done on the government side in terms of additional clarification, strengthening and revision of the Regulations, making conforming revisions to conflicting legislation like the State Secrets and Archives Laws, and eventual adoption of a more authoritative access to information law, as well as providing necessary resources, training and guidance to improve government performance and understanding of its OGI obligations. The State Council General Office recently released additional guidance on handling OGI requests that appears to endorse a restrictive interpretation of the “special needs” language of Article 13 of the Regulations, although it also urges government agencies to more proactively disseminate information that is the subject of a request but is something the general public should or might want to know about, both so as to reduce the number of requests and to increase the efficiency of OGI work.[46]

It is too early to tell how this new State Council guidance will impact OGI implementation. Nevertheless, it is the public, in China as well as around the world, who will ultimately determine the success or failure of China’s fledgling access regime. As international observers and advocates of transparency initiatives around the world have noted, “[T]he response from civil society needs to be energetic, committed, and long term. ... Without a demand for information and vigorous monitoring of government implementation and enforcement efforts, the hard-won right to information can quickly atrophy.”[47] Thus far, the widespread and assertive citizen

utilization of the fledgling OGI system bodes well for the continued, if uneven, development of a more open and responsive Chinese government and realization of the Chinese people's right to know.

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## Notes

1. See, e.g., Owen Fletcher, "China's Transparency is Just Thin Air," *Asia Times*, September 12, 2008, at: <http://www.atimes.com/atimes/China/JI12Ad01.html>.
2. Sheng Dalin, "China's sham information disclosure law," UPI Asia.com, April 30, 2009, at: [http://www.upiasia.com/Politics/2009/04/30/chinas\\_sham\\_information\\_disclosure\\_law/7220/](http://www.upiasia.com/Politics/2009/04/30/chinas_sham_information_disclosure_law/7220/).
3. Alex Wang, "China's Supreme People's Court to Release Judicial Interpretation on Open Government Information This Year" [citing a Chinese article in *Caijing* magazine], April 30, 2009, at: <http://www.greenlaw.org.cn/enblog/?p=1138>.
4. Peking University Center on Public Participation Studies and Supports, Annual Watch Report on China's Administrative Transparency – 2008 [中国行政透明度观察报告-2008 年度] (copy on file with the author); "Beijing Ranks 11<sup>th</sup> in Information Disclosure Survey," *China Daily*, May 12, 2009.
5. See, Jamie P. Horsley, "China Adopts First Nationwide Open Government Information Regulations," on Freedominfo.org, posted May 9, 2007 at <http://www.freedominfo.org/features/20070509.htm>.
6. Su Yongtong, 《独家披露：漳州PX环评批复书》 [Exclusive: Zhangzhou PX Environmental Approval Document], February 22, 2009, *South China Weekend News*, at <http://www.infzm.com/content/24173>.
7. See, Congressional-Executive Commission on China (CECC), "SEPA Issues Measures on Open Environmental Information, at: <http://www.cecc.gov/pages/virtualAcad/index.phpd?showsingl=101942>, with an English translation of the Measures prepared by the CECC at: <http://www.cecc.gov/pages/virtualAcad/index.phpd?showsingl=95188>.
8. See, e.g., Joan Hu, "One Year of Openness: Greenlaw and the First Anniversary of China's Open Information Regulations," May 4, 2009, <http://www.greenlaw.org.cn/enblog/?p=1154>.
9. "The China Pollution Information Transparency Index, 2008 First Annual Assessment Results for 113 Cities; Breaking the Ice on Environmental Open Information," June 3, 2009, at: <http://www.ipe.org.cn/uploadFiles/2009-08/1251342198040.pdf>.

10. Id.

11. An announcement of some of the project's publications, including a monthly *China Government Transparency Watch*, was posted on March 31, 2010 on the Center's website at: <http://www.cppss.cn/Third.asp?id=947>.

12. 《北京爱知行研究所 2009 年政府信息公开项目工作报告》 [Beijing Aizhixing Research Institute Report on 2009 Open Government Information Project Work], February 11, 2010, <http://www.ngocn.org/?action-viewnews-itemid-73253>.

13. Qin Xudong, 《信息公开行政诉讼案开庭 安徽省政府成被告》 [Court to Hear Administrative Lawsuit on Information Disclosure, Anhui Provincial Government Becomes the Defendant], *Caijing*, October 9, 2008, at: <http://www.caijing.com.cn/2008-10-09/110018705.html>.

14. 《律师状告安徽省政府信息公开案败诉》 [Lawyer Who Sues Anhui Government Loses Information Disclosure Case], *Caijing*, October 22, 2008, at: <http://www.caijing.com.cn/2008-10-22/110022182.html>.

15. Lawyer's note dated July 2, 2009, before a reprint of the article at note 14 above, at: [http://www.gongyichina.org/news\\_show.asp?id=60](http://www.gongyichina.org/news_show.asp?id=60).

16. 《知名律师郝劲松申请杨佳案信息公开》 [Famous Lawyer Hao Jinsong Requests Disclosure of Information about the Yang Jia Case], October 20, 2008, *Huashang Net*, at: [http://news.jcrb.com/lvshi/200810/t20081020\\_84260.html](http://news.jcrb.com/lvshi/200810/t20081020_84260.html).

17. 《上海市政府介入钓鱼执法事件 律师申请信息公开》 [Shanghai Government Involved in "Fishing" Enforcement Case; Lawyer Requests Information Disclosure], *Legal Daily*, October 19, 2009, at: [http://www.legaldaily.com.cn/2008fjdt/2009-10/19/content\\_1167820.htm](http://www.legaldaily.com.cn/2008fjdt/2009-10/19/content_1167820.htm).

18. 《律师向山西省卫生厅申请信息公开》 [Lawyer Requests Shanxi Provincial Health Bureau for Information Disclosure ], *Sina.com*, March 21, 2010, at: <http://news.sina.com.cn/c/2010-03-21/061717249331s.shtml>.

19. Will Clem, "Half of Websites Miss The Mark," *South China Morning Post*, February 23, 2010, at: <http://www.scmp.com/portal/site/SCMP/menuitem.2af62ecb329d3d7733492d9253a0a0a0/?vgnextoid=12f549df716f6210VgnVCM100000360a0a0aRCRD>.

20. Horsley, note 5 above.

21. All annual OGI reports in Chinese are linked on the Shanghai government's website at: <http://www.shanghai.gov.cn/shanghai/node2314/node2319/node14868/userobject21ai328725.html>.

22. Many provinces did not report statistics on a comprehensive basis, even at the provincial level, so comparisons across provinces are difficult to make.
23. 《辽宁首例个人请政府信息公开信息得到答复》 [Individual Receives First Written Response to Open Government Information Request in Liaoning Province], *Liaoshen Evening News*, August 15, 2008, at: [http://www.ln.xinhuanet.com/xwzx/2008-08/15/content\\_14129207.htm](http://www.ln.xinhuanet.com/xwzx/2008-08/15/content_14129207.htm).
24. “Man to Appeal on Information Disclosure Lawsuit,” *China Daily*, September 1, 2009, at: [http://www.chinadaily.com.cn/china/2009-09/01/content\\_8641137.htm](http://www.chinadaily.com.cn/china/2009-09/01/content_8641137.htm).
25. 《浙江余姚 68 名村民信息公开案告赢市政府》 [68 Villagers of Yu Yao, Zhejiang Successfully Sue Municipal Government Over Open Information Case], *China Youth News*, October 10, 2008, at: <http://www.chinanews.com.cn/sh/news/2008/10-10/1407244.shtml>.
26. *See*, Shanghai annual OGI reports, note 21 above.
27. 《上海：四年 4—其信息公开“民告官”》 [Shanghai: 400 Cases in Four Years of “Citizens Suing the State” Over Information Disclosure], *People’s Daily*, November 12, 2008, at: [http://news.jcrb.com/xwjj/200811/t20081112\\_97207.html](http://news.jcrb.com/xwjj/200811/t20081112_97207.html).
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30. “Citizen Demands Government Transparency,” August 4, 2009, [http://www.danwei.org/front\\_page\\_of\\_the\\_day/government\\_transparency\\_crusad.php](http://www.danwei.org/front_page_of_the_day/government_transparency_crusad.php), citing 《青年要求政府信息公开被当间谍》 [Young Man Asking Gov’t to Disclose Information Deemed a Spy], *Xiandai kuaibao*, August 4, 2009, at: [http://kuaibao.xinhuanet.com/html/2009-08/04/content\\_71186228.htm](http://kuaibao.xinhuanet.com/html/2009-08/04/content_71186228.htm).
31. [政府信息公开不公开“民告官”获胜](#) [Victory Achieved in Case of ‘Citizen Suing the State’ Over Non-Disclosure of Government Information], *Hebei Youth Daily*, April 14, 2009, <http://qiye.hebnews.cn/qyxwdt/2009/0414/bdb70d96209ed62f0120a280bb731172.html>.
32. 《湖南湘潭大学五博士状告政府 要求公开收费信息》 [Five PhDs from Hunan’s Xiangtan University Sue the Government Requesting Information about Administrative Fees], *Xinhua News Agency*, June 6, 2008, at: <http://politics.people.com.cn/GB/7349449.html>.

33. 《湘潭一、二、三大桥收费站将于明年元月撤除》 [Abolition of the Toll Stations on Xiangtan Bridges Nos 1,2 and 3 as of January 1] , September 16, 2008, at: [http://www.xiangtan.gov.cn/china\\_xiangtan/jrxt/jrxt\\_detail.jsp?ID=660921000000000000.7225](http://www.xiangtan.gov.cn/china_xiangtan/jrxt/jrxt_detail.jsp?ID=660921000000000000.7225).
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35. “Gov’t yields to public pressure to publicize stimulus package details,” *Xinhua News Agency*, March 2, 2009, at: [http://english.gov.cn/2009-03/02/content\\_1247623.htm](http://english.gov.cn/2009-03/02/content_1247623.htm).
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