



Felix Collins  
MHA, Placentia – St. Mary's  
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Dear Mr. Collins,

My name is Michael Karanicolas and I am the Legal Officer for the Centre for Law and Democracy, the NGO that authored the report which unfavourably compared Newfoundland's access to information law to those of several developing countries (the analysis in its entirety is available at [www.law-democracy.org](http://www.law-democracy.org)).

In response to your remarks about the Charter, and the state of human rights in the developing world, I would point out that many of the countries you cited do, in fact, have their own equivalents of Canada's Charter of Rights and Freedoms. What is more, several of these countries offer constitutional protection for the right to information, an internationally recognized human right that is currently not fully recognized in Canada. Specifically, I would draw your attention to the constitutions of Mexico, Ethiopia, Uganda and Bulgaria, all of which recognize access to information as a human right, and all of which have stronger access to information frameworks than Newfoundland's will, if Bill 29 passes.

This is not to say that Ethiopia and Uganda are, necessarily, more transparent societies. Our analysis measured only the strength of the legal framework for access, not the quality of its implementation. However, it is nonetheless notable that while these countries' governments are passing strong access to information frameworks and working to improve government transparency, with Bill 29 the Newfoundland government is moving in precisely the opposite direction, towards greater secrecy and less openness. It is also somewhat troubling that, as Newfoundland's Minister of Justice and a main proponent of

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The Centre for Law and Democracy is a non-profit human rights organisation working internationally to provide legal expertise on foundational rights for democracy.

reform for Newfoundland's transparency system, you have such a poor grasp of the state of the right to information around the world.

As Canadians, we like to consider ourselves at the forefront of human rights recognition and protection. In the context of the right to information, there was once a time when this was true. But the unfortunate reality is that, while countries around the world continue to advance and improve their framework for public transparency, jurisdictions in Canada are stagnating at best and moving backwards at worst. Bill 29 is inarguably a major step backwards in this regard.

We hope that you will reconsider the passage of Bill 29, and recognize the importance of government transparency in Newfoundland, and the right of Newfoundland's people to be fully informed of the activities of their government.

Yours Sincerely,

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