

Independent Reporting Mechanism

Midterm Review: The
Netherlands 2023–2027

Open
Government
Partnership



Independent
Reporting
Mechanism

Key Findings

The Netherlands substantially revised its fifth action plan, raising its ambition. It introduced seven new commitments, revised eight ongoing commitments, and removed nine commitments that were finished by the end of 2025. During the first two years of implementation, commitments enhanced government transparency by supporting implementation of the Open Government Act, open data, information management, and meaningful disclosure of information. The refresh process, led by the Talking About Information Coalition, introduced new thematic areas like open algorithms. It strengthened government and civil society collaboration and ownership of OGP commitments. More commitments now have modest or substantial potential for results (60%), compared to the original action plan (41%). Several of the new commitments are in exploratory phases, so their results will depend on the scalability of the efforts and government uptake.

About the Report

The **Open Government Partnership (OGP)** is a multi-stakeholder initiative focused on improving government transparency, ensuring opportunities for citizen participation in public matters, and strengthening mechanisms for public accountability. OGP brings together government and civil society champions of reform who believe governments are more effective and credible when they open their doors to public input and oversight.

The **Independent Reporting Mechanism (IRM)** is OGP's accountability arm and the main means of tracking progress in participating countries. Since 2011, the IRM has provided independent, evidence-based, and objective reporting to hold OGP members accountable and support their open government efforts. This is done through reports and timely recommendations during key moments in the action plan cycle.

The IRM provides a **Midterm Review** to countries undertaking four-year action plans, who are expected to undertake a refresh process at the two-year mark. The refresh process is an opportunity for countries to take stock of implementation progress thus far and update the action plan as needed. The Midterm Review analyzes significantly amended or new commitments (Section I), provides a general update on implementation progress (Section II), and evaluates the refresh process (Section III).

Section I. Action Plan Refresh

The Netherlands substantially revised its 2023–2027 action plan, consequently raising its ambition. It introduced seven new commitments, widening the action plan’s focus on meaningful disclosure of information and introducing open algorithms reforms. The refresh process strengthened cooperation between government and civil society on the action plan.

To deepen civil society’s role in the OGP process, the Program for Open Government (*Programma Open Overheid* or PROO) of the Ministry of the Interior and Kingdom Relations (*Ministerie van Buitenlandse Zaken* or BZK) commissioned the civil society coalition Talking About Information (*Maatschappelijke coalitie Over Informatie Gesproken* or MCOIG) to lead the action plan refresh. To begin with, the MCOIG identified thematic areas for the refreshed action plan by reviewing implementation progress and gathering input from relevant policy departments,¹ the multi-stakeholder forum (MSF),² and a survey of commitment holders.³ In July 2025, the MCOIG published an open call for commitment proposals in those areas.⁴ The MCOIG and BZK jointly selected the final set of new commitments.⁵ Discussions between commitment leads and the MCOIG also led to revision of ongoing commitments.⁶ Overall, the MCOIG and BZK noted a positive trajectory for co-creation in the Netherlands, highlighting civil society leadership and policy departments’ collaboration.⁷ One civil society participant reflected that co-creation could continue to be deepened through further involvement of civil society, municipal governments, regional governments, and executive organizations.⁸

The refresh process substantially amended the action plan, consequently raising its ambition. It introduced seven new commitments, revised eight ongoing commitments, and removed nine commitments that were finished by the end of 2025. The new commitments seek to advance government transparency around data, information, algorithms, standards, and open source—broadening and re-organizing the original action plan, which focused largely on the Open Government Act (*Wet open overheid* or Woo). To resource implementation, additional funding was made available for the action plan, with EUR 300,000 for new commitments and EUR 78,710 specifically for open algorithm commitments.⁹ Of the eight amended commitments, changes to two increased their ambition (see Table 1 below). In particular, Commitment 11 now has substantial potential to achieve results as it was amended to establish a policy office facilitating open-source software across all ministries. More actors are now involved in implementation, as all new commitments are led by civil society, academia, or private sector partners. More commitments now have modest or substantial potential for results (60%), compared to the original action plan (41%).

The refreshed plan is more streamlined as well. For instance, Commitment 4 merged two proposals on open information, and three partners signed a collaboration agreement to implement Commitments 7, 8, and 9 on open algorithms.¹⁰ Overall, the new commitments apply social innovation to areas identified as priorities by government departments. This approach aims to ensure that commitments’ outputs are used for policy making, as less than two years remain for implementation.¹¹ The commitments also align with the 2025 revised Netherlands

Digitalization Strategy (NDS)¹² and the government’s objective of moving towards an open state, where both government and civil society share responsibility for openness.¹³

Several of the new commitments are still in a testing or exploratory phase. For the open algorithm commitments, this approach was intended to provide implementers with the flexibility to test new ideas before determining how they could be scaled.¹⁴ However, most commitments lack specific details on how results could be embedded in policy or government practices or how follow up will be ensured. Results will therefore depend on the scalability of commitments’ efforts beyond the foreseen pilots, and the government’s long-term uptake of new practices.

To ensure collaboration on implementation, from 2026 onwards, the MCOIG plans to organize eight yearly MSF meetings and have monthly calls with policy departments and commitment leads to oversee progress on OGP.¹⁵ In addition, the government’s active involvement in selecting new commitments areas reflects government ownership of the new commitments, reducing the risk that results remain isolated or fail to be adopted institutionally. To support cooperation across commitments, the MCOIG could consider interactive approaches like thematic roundtables, peer-exchanges, and lessons learned sessions.

Table 1. Refresh Commitments Review

Table 1 assesses all new or significantly amended commitments in the Netherlands’ refreshed action plan.¹⁶ For information on IRM methodology, see the IRM Procedures Manual.¹⁷

| Commitment 1: Reuse of high-value open government information and data |
|---|
| <ul style="list-style-type: none">• Verifiable: Yes• Does it have an open government lens? Yes• Potential for results: Unclear |
| <p>Despite the large amounts of open government data already published, their reuse and social impact are hindered by limited visibility, findability, and quality. Under this new commitment, the Public-Innovation B.V. company would lead research to understand existing challenges in the reuse of government data and produce a catalogue of examples of open data applications, accompanied by recommendations for better reuse of high-value datasets. It also intends to increase visibility of the topic through awareness raising activities.</p> <p>This commitment’s potential for results is unclear. It mentions the inclusion of research recommendations in policy, technology, and communication but does not clarify whether and how the government would follow up. A government official explained that implementers are seeking to understand how data is being reused and then intend to consider follow-up options based on recommendations.¹⁸ Results will depend on identifying concrete steps to translate the research into real-world improvements to information disclosure and use.</p> |

Commitment 2: Journalistic use cases for high-value datasets

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

The journalistic and social use of high-value datasets is limited, often due to their complexity and a lack of knowledge among journalists on how to decode them. Under this new commitment, the investigative journalism organization Momus and the Dutch Statistics Agency (*Centraal Bureau voor de Statistiek* or CBS) would organize two journalistic hackathons covering housing and the energy transition in order to ‘crack’ complex high-value datasets and translate them into specific journalistic use cases. The commitment holders intend to provide the hackathon winners with support to publish their stories. They plan to include lessons learned from the hackathons in a playbook, which will serve as a practical guide for organizing co-creation sessions between government data providers and journalists.

This commitment showcases an innovative approach of using high-value datasets and a new area for the hackathon model. According to the Ministry of the Interior and Kingdom Relations (BZK), hackathons are a method which has made successful progress in other contexts, like the implementation of the Open Government Act (Woo).¹⁹ Although the commitment scope is limited to four to six journalistic use cases and the subsequent playbook, commitment holders are aiming to make this method replicable for other government data providers and media organizations, so that co-creation around high-value datasets becomes a scalable practice, not a one-off experiment.²⁰

Going forward, implementers could consider planning dissemination activities to raise awareness of the methods developed and lessons learned among journalists. This could be coupled with training for journalists on how to navigate high-value datasets, including partnerships with journalism schools. To ensure sustainability of this commitment beyond the action plan cycle, implementers could also consider establishing a public repository of journalistic use cases with replicable models, with periodic updates to include new cases.

Commitment 3: Decisions in context

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

When administrative decisions from government bodies are disclosed, they are often published in isolation and disconnected from other government documents that give them meaning, limiting their usefulness. The Open Government Act (Woo) will soon require the disclosure of all

such decisions.²¹ Therefore, under this new commitment, Tilburg University aims to introduce the Administrative Decision Identifier (ADI), an open standard to record the core characteristics of decisions as metadata and connect them with other government documents. It also plans to produce a guide to help government authorities provide context and explanations for published decisions, to make them more understandable.

Within the scope of this commitment, ADI would be applied in a pilot limited to three datasets. Following the action plan period, Tilburg University aims to apply ADI to at least 100,000 decisions that it has processed to date.²² The Open State Foundation anticipates that this would be a step forward for access to information. By helping individuals understand why a particular government decision was made, ADI could support citizens in asserting rights related to the decision.²³ The results of this commitment will depend on when the government's obligation to actively disclose this type of information becomes effective, and on sustained implementation of ADI beyond the pilot. The role of the digital government service (Logius KOOP) of the Ministry of the Interior and Kingdom Relations in developing the tool may facilitate potential future inclusion of ADI in government document management systems and uptake among government officials.²⁴

Commitment 4: Grounds for exemption

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

Under this new commitment, Leiden University plans to produce a report on the reasons why the government applies grounds for exemption in information disclosure. Findings from the research would feed into the Dutch Advisory Council on Openness and Information Management (*Adviescollege Openbaarheid en Informatiehuishouding* or ACOI) guidelines.²⁵

Although the commitment does not include milestones to directly reform government practices, it holds the potential to shed light on the use of exemption in information disclosure. The Open State Foundation expects this commitment to influence government practices through the ACOI guidelines, promoting more consistent application of the grounds for exemption by government departments, in turn reducing misuse. Its results will depend on government uptake of the guidelines and support by civil society.²⁶ Implementers could consider training for government officials on the guidelines and establishing a periodic reporting requirement for the government on their use of exemption, with a channel for civil society feedback.

Commitment 7: Cooperating on explainable algorithms

- Verifiable: Yes

- Does it have an open government lens? Yes
- Potential for results: Unclear

This new commitment focuses on transparency in algorithmic decision-making. It would map the types of information that citizens need on government use of algorithms, subsequently producing recommendations and guidelines on how to accessibly communicate it. This commitment is led by the company M&I/Partners and will be implemented in collaboration with implementers of Commitments 8 and 9. Collaboration has been formalized by an agreement that sets common principles for the commitments' implementation and establishes a steering committee.²⁷

The Algorithms and Safeguards Team of the Ministry of the Interior and Kingdom Relations (BZK) is planning to use the commitment's outputs to inform an ongoing revision to the Dutch General Administrative Law Act (*Algemene wet bestuursrecht*),²⁸ specifically reflecting algorithmic transparency obligations.²⁹ However, the potential for results of the commitment's guidelines remains unclear as the Netherlands already has existing resources in this policy area,³⁰ from guidebooks, model frameworks, and model provisions developed in recent years. During implementation, it is advisable to include a wider group of municipalities and ensure that consultations cover diverse groups of citizens. Stakeholders could also consider establishing a mechanism to monitor how the government follows up on recommendations to improve transparency in algorithmic decision making.

Commitment 8: Algorithm Guide

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Unclear

This new commitment also focuses on algorithmic transparency, in collaboration with Commitments 7 and 9. The company InnoValor aims to further develop the Algorithm Guide, a project it began in 2021 to provide users with pictograms to easily understand important components of algorithms such as the use of personal information—similar to a viewing guide for films.³¹ The guide will also help government organizations use algorithms more responsibly.

The commitment's potential for results is unclear as government adoption of the pictograms will only be determined after the commitment is completed.³² Implementers intend to inform the guide with a 2021 survey, which may be outdated. New developments to the guide would also be validated with citizens. This commitment aligns with the government's efforts to explore how the public can understand algorithms better. Since it was first launched, the guide's pictograms have remained in testing phase and not been formally adopted by the government. To support integration with existing government tools, implementers could provide specific recommendations on where and how the pictograms could potentially be used.

Commitment 9: Control and rights of citizens to transparency, in algorithm-based decision making

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

Led by Waag Futurelab foundation, this new commitment focuses on another dimension of algorithmic transparency in close coordination with Commitments 7 and 8. It aims to create a website prototype that would explain information requests about government algorithms, allow citizens to submit requests and complaints, and offer the government with the opportunity to respond. Publication of requests and complaints would anonymize personal data.

This commitment has modest potential to increase transparency around information requests relating to government algorithms. At present, government departments are only required to publish information after a request has been processed and do not have access to information on requests received by other departments. The planned website could become a single platform centralizing all information requests on government algorithms, providing real-time information to the public and government stakeholders.³³ However, the impact of this commitment will largely depend on whether its prototype is followed by development of a functional version of the website and adopted by the government. Plans to develop the prototype in consultation with the government—including the choice of design standards—and to hold a symposium to follow up on results increase the chances of uptake.

To avoid duplication of digital platforms, commitment holders could consider potential ways to integrate the tool with existing systems to access government information and submit Woo requests, like data.overheid.nl or [Woogle](https://woogle.nl). To ensure transparency of the requests submitted, the IRM also suggests using a set of key performance indicators, such as the number of submissions per thematic area, or the percent of requests answered by the deadline.

Commitment 11: Open Source Program Office

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Substantial*

* This commitment was significantly amended during the refresh process. Therefore, the IRM changed this coding from what was initially determined in the Action Plan Review.

The government's 2020 *Open, Unless* policy requires software developed or commissioned by the government to be open source to the greatest extent possible. This commitment originally

planned to establish an Open-Source Program Office (OSPO) within the Ministry of the Interior and Kingdom Relations (BZK) to encourage and facilitate the ministry’s open-source work.³⁴ The commitment was revised, with a new milestone to establish a cross-ministerial lead agency, named OSPO Rijk, situated within the central government coordination structure for information management and digital policy (CIO Rijk).

The establishment of a central OSPO could substantially enhance transparency, consistency, and cooperation in the publication of government-developed software across ministries and national government bodies. In the long term, the Open State Foundation expects this to encourage the private sector to move towards open source—particularly government suppliers.³⁵ However, the revised commitment does not outline a concrete scope for OSPO Rijk’s role, responsibilities, planned actions, and interaction with other existing ministry-level OSPOs. Implementers could consider clarifying the role and responsibilities of OSPO Rijk and establishing clear coordination structures to avoid duplication of efforts or inconsistencies with the work of existing OSPOs. In line with the IRM recommendation in the Action Plan Review,³⁶ the government could consider developing a work plan for OSPO Rijk that includes clear targets for the publication of source code of government software across ministries. Collaboration with the implementers of other open algorithm commitments is also encouraged.

Commitment 15: Professionalization of participation

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest*

* This commitment was significantly amended during the refresh process. Therefore, the IRM changed this coding from what was initially determined in the Action Plan Review.

This Open Gov Challenge commitment, led by the Participation Knowledge Hub of the Ministry of Infrastructure and Water Management (IenW), was considerably amended during the refresh. Five new milestones were added along with new implementing partners: the Hague University of Applied Sciences, the Organization for Economic Co-operation and Development (OECD), and Digicampus. The commitment continues to have a milestone to update the knowledge agenda³⁷ with the latest developments on civic participation.

Revisions also added specific and actionable milestones to institutionalize interdepartmental collaboration on public participation. This includes developing an interdepartmental work plan to exchange knowledge on participation and appointing contact persons—partially responding to one of the IRM Action Plan Review recommendations.³⁸ The work plan and contact persons could help enhance consistency in participation practices across ministries. Implementers could consider clarifying the contact persons’ roles and responsibilities as well as the type of actions that will be included in the work plan, its coverage period, and monitoring plan. Implementers

can also ensure that the work plan includes clear short-term and long-term action points for different ministries, with concrete targets and timeframes for implementation.

The revised commitment also includes a milestone to develop a pilot AI tool for online participation. It is being developed in cooperation with Digital Campus, the OECD, and several municipalities, provinces, and ministries. Its results will depend on its scope and formal adoption by the government.

¹ Floortje Fontein and Maartje Hof's (Program for Open Government of the Ministry of the Interior and Kingdom Relations), interview by the IRM, 9 February 2026.

² "Multi-stakeholders bijeenkomst: Actieplan Open Overheid" [Multi-stakeholder meeting: Open Government Action Plan], Talking About Information Coalition, 14 March 2025, <https://www.overinformatiegesproken.nl/nieuws/actieplan-open-overheid-16-april>.

³ Paul Suijkerbuijk and Laurens van der Molen (Talking About Information Coalition), interview by the IRM, 23 February 2026.

⁴ "Nieuwe ideeën gezocht voor het Actieplan Open Overheid 2026–2027" [New Ideas Wanted for the Open Government Action Plan 2026–2027], Talking About Information Coalition, 11 July 2025, https://www-overinformatiegesproken-nl.translate.goog/nieuws/nieuwe-ideeen-gezocht-voor-het-actieplan-open-overheid-2026-2027?_x_tr_sl=nl&_x_tr_tl=en&_x_tr_hl=en&_x_tr_pto=wapp.

⁵ "Nieuwe actiepunten" [New commitments], Talking About Information Coalition, <https://www.overinformatiegesproken.nl/uitvraag-nieuwe-actiepunten>.

⁶ Suijkerbuijk and van der Molen, interview; Fontein and Hof's, interview.

⁷ Fontein and Hof's, interview.

⁸ Tim Vos-Goedhart (Open State Foundation), interview by the IRM, 21 May 2026.

⁹ "Refreshed Open Government Action Plan 2023–2027: Open for Everyone 2.0," Ministry of the Interior and Kingdom Relations, 5 December 2025, <https://www.opengovpartnership.org/documents/netherlands-action-plan-2023-2027-june>.

¹⁰ Fontein and Hof's, interview; Suijkerbuijk and van der Molen, interview.

¹¹ Suijkerbuijk and van der Molen, interview.

¹² "The Netherlands' Digitalization Strategy," <https://www.nldigitalgovernment.nl/netherlands-digitalisation-strategy-nds>.

¹³ "Refreshed Open Government Action Plan 2023–2027: Open for Everyone 2.0," Ministry of the Interior and Kingdom Relations.

¹⁴ Olaf Schoelink (Directorate-General for Digitalization and Government Organization of the Ministry of the Interior and Kingdom Relations), interview by the IRM, 13 March 2026.

¹⁵ Suijkerbuijk and van der Molen, interview.

¹⁶ "Refreshed Open Government Action Plan 2023–2027: Open for Everyone 2.0," Ministry of the Interior and Kingdom Relations.

¹⁷ "Independent Reporting Mechanism," Open Government Partnership, accessed 2026, <https://www.opengovpartnership.org/irm-guidance-overview>.

¹⁸ Fontein and Hof's, interview.

¹⁹ Fontein and Hof's, interview.

²⁰ Alexander Beunder (Momus), correspondence with the IRM, 18 March 2026.

²¹ Vos-Goedhart, interview.

²² Johan Wolswinkel (Tilburg University), correspondence with the IRM, 18 March 2025; "Beschikkingen in Beeld" [Decisions in Focus], Tilburg University, Open State Foundation, and Centerdata, accessed 30 June 2026, <https://beschikkingeninbeeld.nl/>.

²³ Vos-Goedhart, interview.

²⁴ Wolswinkel, correspondence.

²⁵ Louis Honée (Leiden University), correspondence with the IRM, 18 March 2026.

²⁶ Vos-Goedhart, interview.

²⁷ The Program for Open Government of the Ministry of the Interior and Kingdom Relations shared a copy of the collaboration agreement for open algorithm commitments with the IRM, 3 October 2025.

²⁸ *Dutch General Administrative Act*, <https://download.belastingdienst.nl/itd/beleid/awb0503.pdf>.

²⁹ Schoelink, interview.

³⁰ Vos-Goedhart, interview.

³¹ “Algoritmewijzer” [Algorithm Guide], InnoValor, accessed 7 April 2026, <https://innovalor.nl/algoritmewijzer/#:~:text=De%20Algoritmewijzer%20is%20een%20initiatief,succes%20van%20een%20digitale%20innovatie.>

³² Schoelink, interview.

³³ Schoelink, interview.

³⁴ See ‘12. Open Source Program Office’ in: “The Netherlands Open Government Action Plan 2023–2027,” Open Government Partnership, June 2023, <https://www.opengovpartnership.org/documents/netherlands-action-plan-2023-2027-june.>

³⁵ Vos-Goedhart, interview.

³⁶ “IRM Action Plan Review: The Netherlands 2023–2027,” Open Government Partnership, 7 October 2024, <https://www.opengovpartnership.org/documents/netherlands-action-plan-review-2023-2027.>

³⁷ “Onderzoekspublicaties” [Research publications], Participation Knowledge Hub, <https://www.kennisknooppuntparticipatie.nl/publicaties/onderzoekspublicaties/default.aspx.>

³⁸ “IRM Action Plan Review: The Netherlands 2023–2027,” Open Government Partnership.

Section II. Implementation Update¹

By the end of 2025, nine of the original action plans' commitments were finished and progress was made on the remaining eight, with some delays. These commitments related to government transparency, supporting implementation of the Open Government Act, open data, information management, and meaningful disclosure of information.

After the first two years of implementation, nine commitments were finished and removed from the refreshed action plan. Progress was made on the remaining eight, with delays in some of the planned activities. The national OGP website offered quarterly information on implementation progress through the third quarter of 2024 and featured interviews with most commitment leads on commitments' context, challenges, and early results.² The Talking About Information Coalition (MCOIG) Evaluation Report³ and refreshed action plan⁴ provided additional information on implementation. Below is a high-level and informal overview of commitments' implementation status, with a focus on commitments identified as promising in the Action Plan Review, submitted to the Open Gov Challenge, or where there was notable evidence of progress.

Removed Commitments

The Ministry of the Interior and Kingdom Relations (BZK) and the Ministry of Education, Culture and Science (OCW) finished the Commitment on the Multi-Year Plan for Public Access and Information Management of the Dutch Government,⁵ which was identified as promising in the IRM Action Plan Review.⁶ Under this commitment, the ministries published and began implementing the 2024–2025 plan, which was submitted to the Senate and House of Representatives in December 2023.⁷ In parallel, the Association of Netherlands Municipalities (VNG), the Institute for Public Procurement (IPO), and the Union of Water Boards published multi-year plans as well.⁸ The Dutch Advisory Council on Openness and Information Management (ACOI) issued an advisory opinion recognizing the positive steps taken by the plans' adoption. It also identified some areas for improvement like the need for a single national approach to public access and information management, as well as the need to ensure long-term planning and funding.⁹ The BZK responded to ACOI's opinion and addressed some of its recommendations,¹⁰ expanding the implementation period of the multi-year plan to cover the 2026–2030 period.¹¹ While the recommendation to adopt a single national plan was not taken up, the government is working to improve coordination across existing plans, including through the a Joint Innovation Agenda.¹²

The University of Amsterdam (UvA) finished the Commitment on FAIR Woo Files,¹³ which was also submitted to the Open Gov Challenge. It piloted a software to assess Woo file publications against the Findable, Accessible, Interoperable, and Reusable (FAIR) principles, testing it on over 1 million files. Work primarily focused on ensuring that documents are findable.¹⁴ During implementation, the search tool Woogle expanded from 1 million pages in 2022¹⁵ to 20 million pages by the end of 2025.¹⁶ To promote FAIR publishing, Woogle, UvA, the National Archives, and the Institute for Social Innovation (IMI) organized a challenge and award ceremony for ministries

responding to Woo requests. Other awareness raising activities included participation in events, workshops, lectures, and more than 14 peer-reviewed publications.¹⁷ According to commitment holders, the biggest challenge to implementation was achieving a cultural and organizational shift, which requires continued long-term efforts.¹⁸

Additional commitments reported as completed and removed from the action plan during the refresh period resulted in the following:

- The Commitment on the Central Government Annual Report on Operational Management¹⁹ produced a new dashboard (*Woo in cijfers*) with quarterly data on how ministries process Woo requests, including information on objections, appeals, and fines for late responses.²⁰ These data were not public before and had long been requested by civil society to strengthen government accountability.²¹
- The Commitment on the Implementation Assessment of the Open Government Act (Woo)²² published a study that identified challenges and good practices from the perspectives of both users and the government. This triggered government follow up measures to improve Woo's process, public information, information management, and monitoring and accountability.²³ The government formed working groups to address some of these issues, including accelerating responses to information requests, addressing the misuse of the law, and clarifying the role of contact points.²⁴
- The Commitment on Research on Information Needs and Protocols²⁵ saw the publication of a research report by the Institute for Social Innovation (IMI) that prompted a stronger government focus on 'meaningful transparency,' applying this concept to other themes like open data and open algorithms. The government used the research findings to develop a decision-making framework for government organizations to determine how they can proactively publish information and data in ways that are meaningful to society.²⁶

Ongoing Commitments

Under Commitment 5, identified as promising by the IRM Action Plan Review,²⁷ the Ministry of the Interior and Kingdom Relations (BZK) and the Open State Foundation produced a prototype procurement app, AI Tenderportaal,²⁸ to promote the use of the Doing Business with the Government platform.²⁹ By March 2026, the BZK was assessing to what extent the prototype could be converted into a publicly available application.³⁰ In addition, the Open Contracting Partnership (OCP) conducted a gap analysis to identify missing government procurement information.³¹ The commitment's other milestones were not yet finished. The BZK conducted an exploratory study on a dialogue function to engage external stakeholders, with next steps for rollout still under discussion. Meanwhile, publication of the category plans was incomplete, with 14 of the 22 plans having been published by October 2025.³²

Commitment 15, also submitted to the Open Gov Challenge, was partially implemented by the end of 2025, with some milestones delayed. It launched a new Knowledge Agenda in 2024 which identifies and prioritizes urgent research questions on participation.³³ Research vouchers of EUR 15,000 each were awarded to promote work on the identified topics.³⁴ In October 2024,

the second Participation Research and Practice network meeting (POP2) brought together a wide range of stakeholders to discuss how participation can better integrate citizens' perspectives into policy processes.³⁵ Over the next two years, the efforts on inter-departmental collaboration on participation are to be implemented through refreshed milestones (see Section 1). The online tool to assist public officials in adopting participatory approaches was delayed, but this milestone will also continue during the remainder of the implementation period.

Finally, under Commitment 12, the Amsterdam Public Access Centre won the MCOIG Transparency Award in 2025 for its contribution to making information more accessible to citizens.³⁶ For the first time, the Municipality of Amsterdam established a physical space where anyone can request information and ask questions on open government during walk-in consultation hours, also promoting exchanges between citizens and municipality staff. The city simultaneously trained staff to answer questions on open government.³⁷ The outcome of the 2026 Dutch municipal elections may affect the implementation of this commitment as changes in the political composition of local government could alter priorities, funding, or administrative support. Implementers could consider adopting mitigation measures to ensure continuity in the event of changes to the political leadership.

¹ **Note:** This section provides an informal overview of the action plan's implementation status at the midpoint. It is based on information available online and evidence provided by key stakeholders. It focuses on commitments identified as promising in the Action Plan Review, submitted under the Open Gov Challenge, or where there is notable evidence of progress online. The IRM will carry out a formal and comprehensive assessment of commitments' level of completion and early results in the Results Report at the end of the implementation period.

² "Over Open Overheid" [About Open Government], Rijksoverheid, <https://www.open-overheid.nl/over-open-overheid>.

³ "Rapportage en advise Herijking Actieplan open overheid 2023–2027" [Reporting and Advice: Revision of the Open Government Action Plan 2023–2027], Talking About Information Coalition, 26 September 2025, <https://www.overinformatiegesproken.nl/nieuws/rapportage-en-advies-herijking-actieplan-open-overheid-2023-2027>.

⁴ "Refreshed Open Government Action Plan 2023–2027: Open for Everyone 2.0," Ministry of the Interior and Kingdom Relations, 5 December 2025, <https://www.opengovpartnership.org/documents/netherlands-action-plan-2023-2027-june>.

⁵ See "5. Multi-Year Plan for Public Access and Information Management of the Dutch Government" in: "The Netherlands Open Government Action Plan 2023–2027," Open Government Partnership, June 2023, <https://www.opengovpartnership.org/documents/netherlands-action-plan-2023-2027-june>.

⁶ "IRM Action Plan Review: The Netherlands 2023–2027," Open Government Partnership, 7 October 2024, <https://www.opengovpartnership.org/documents/netherlands-action-plan-review-2023-2027>.

⁷ "Meerjarenplan Openbaarheid en Informatiehuishouding Rijksoverheid" [Multi-Year Plan for Public Access and Information Management of the Dutch Government], Rijksoverheid, 11 December 2023, <https://www.rijksoverheid.nl/documenten/2023/12/11/meerjarenplan-openbaarheid-en-informatiehuishouding-rijksoverheid>.

⁸ "Actieplan Open Overheid (OGP): Interviewserie" [Open Government Partnership (OGP) Action Plan: Interview Series], Rijksoverheid, <https://web.archive.org/web/20251114141531/https://www.open-overheid.nl/over-open-overheid/actieplan-open-overheid>.

⁹ "Alles is niets: Advies over meerjarenplannen van de overheid voor de digital informatiehuishouding" [Everything Is Nothing: Advice on Government Multi-Year Plans for Digital Information Management], Advisory Council on Openness and Information Management, May 2024, <https://www.acoi.nl/publicaties/publicatie/mt4wvzbz/alles-is-niets.-advies-over-meerjarenplannen-digitale-informatiehuishouding>.

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¹⁷ “Rapportage en advise Herijking Actieplan open overheid 2023–2027,” Talking About Information Coalition.

¹⁸ “Actieplan Open Overheid (OGP): Interviewserie,” Rijksoverheid.

¹⁹ See ‘10. Central Government Annual Report on Operational Management’ in: “The Netherlands Open Government Action Plan 2023–2027,” Open Government Partnership.

²⁰ “Refreshed Open Government Action Plan 2023–2027: Open for Everyone 2.0,” Ministry of the Interior and Kingdom Relations.

²¹ Floortje Fontein and Maartje Hof (Program for Open Government of the Ministry of the Interior and Kingdom Relations), interview by the IRM, 9 February 2026.

²² See ‘9. Implementation assessment of the Open Government Act’ in: “The Netherlands Open Government Action Plan 2023–2027,” Open Government Partnership.

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²⁶ Fontein and Hof, interview.

²⁷ “IRM Action Plan Review: The Netherlands 2023–2027,” Open Government Partnership.

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Section III. Participation & Co-Creation

The IRM uses the OGP Participation and Co-Creation Standards to assess countries' participatory practices throughout the action plan cycle.¹ Countries are encouraged to aim for the full ambition of the standards and to meet the minimum requirements.² As the Netherlands' action plan falls under a grace period, this assessment does not have implications for its status in the partnership.

Table 2. Alignment with Minimum Requirements at the Midpoint

| Minimum requirement | Met? |
|--|------|
| <p>1.1 Space for dialogue: Since the beginning of 2025, multi-stakeholder forum (MSF) meetings were organized and chaired by the Talking About Information Coalition (MCOIG) on behalf of Ministry of the Interior and Kingdom Relations (BZK).³ The MSF met approximately quarterly in 2024 and 2025.⁴ From 2026 onwards, the MCOIG plans for the MSF to meet eight times a year, with four online and in-person sessions each.⁵ The BZK website provides information on the MCOIG's role,⁶ while the MCOIG website contains information on the MSF mandate, composition, meeting agendas, and registration.⁷</p> | Yes |
| <p>2.1 OGP website: The open-overheid.nl website contains information on the original action plan, revised action plan, and refresh process, as well as an overview of activities, news, interviews with commitment leads, and opportunities for engagement. Information on the refresh process and revised action plan was also published on the MCOIG website.⁸ In 2026, MCOIG began managing the national OGP website.⁹</p> | Yes |
| <p>2.2 Repository: The repository can be accessed at open-overheid.nl. It published progress updates on a quarterly basis until the third quarter of 2024. In 2025, commitment leads were instead asked to provide progress information for the MCOIG evaluation report which was published in September 2025.¹⁰ Information was also published for Open Gov Week in May 2025.¹¹ The MCOIG website published some information on the refresh process.¹² In 2026, MCOIG was designing a new monitoring system to cover implementation progress and collaboration on commitments.¹³ It planned to publish commitment updates on its website following MCOIG meetings.¹⁴</p> | Yes |
| <p>3.1 Advanced notice: During the refresh process, the Program for Open Government (PROO) tasked the MCOIG to communicate about the refresh process and opportunities for stakeholders to provide input.¹⁵ Stakeholders were informed of all steps of the refresh process, although no comprehensive timeline with all opportunities for participation in the process was published in advance. The MCOIG published an invitation to participate in the MSF meeting in April 2025 a month ahead of the meeting.¹⁶ During that meeting, stakeholders were able to provide input for the refresh process and MCOIG announced the opportunity to submit proposals for new commitments over the summer.¹⁷ This opportunity was also communicated at meetings during Open Gov week in May 2025.¹⁸ A timeline for the submission and selection of proposals for new commitments was published on the MCOIG website in July 2025, kicking</p> | Yes |

| | |
|--|-----|
| off a month-long open call for proposals. ¹⁹ | |
| 4.1 Reasoned response: Discussions during MSF meetings and with policy departments were documented, but meeting minutes were not published. Findings of the survey on the status of implementation of the action plan were included in MCOIG’s evaluation report. MCOIG provided verbal feedback on how stakeholder contributions were considered during the April 2025 MSF meeting. It also organized feedback calls with the leads of proposals that were not selected, explaining the rationale behind the decisions and referring them to other potential sources of funding. ²⁰ | Yes |
| 5.1 Open implementation: During the first two years of implementation, MSF meetings were organized at least twice a year and were open to public registration. At these meetings, commitment leads presented progress on implementation and civil society had the opportunity to provide comments. As the MCOIG organized the MSF meetings, there was more diverse civil society participation. ²¹ In 2025, the meetings began to include a new format of interactive roundtable discussions of specific themes. ²² | Yes |

This brief was written by IRM researcher Rocio Naranjo Sandalio in collaboration with IRM staff and reviewed by external reviewer Jeff Lovitt. It was prepared in accordance with the IRM Procedures Manual²³ and guidance on artificial intelligence. For more information, refer to IRM webpage²⁴ or the glossary of IRM and OGP terms,²⁵ or contact the IRM at irm@opengovpartnership.org.

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² “IRM Guidelines for the Assessment of Minimum Requirements,” Open Government Partnership, 31 May 2022, https://www.opengovpartnership.org/wp-content/uploads/2022/05/IRM-Guidelines-for-Assessment-of-Minimum-Requirements_20220531_EN.pdf.

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⁵ Paul Suijkerbuijk and Laurens van der Molen (Talking About Information Coalition), interview by the IRM, 23 February 2026.

⁶ “Over Open Overheid” [About Open Government], Rijksoverheid, <https://www.open-overheid.nl/over-open-overheid>.

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⁸ “Actieplan Open Overheid” [Open Government Action Plan], Talking About Information Coalition, <https://www.overinformatiegesproken.nl/actieplanopenoverheid>.

⁹ The Program for Open Government of the Ministry of the Interior and Kingdom Relations shared a copy of the MCOIG work plan for the action plan refresh with the IRM.

¹⁰ Floortje Fontein (Program for Open Government of the Ministry of the Interior and Kingdom Relations), interview by the IRM, 9 February 2026.

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¹³ Fontein, interview.

¹⁴ Suijkerbuijk and van der Molen, interview.

¹⁵ The Program for Open Government of the Ministry of the Interior and Kingdom Relations shared a copy of the MCOIG work plan for the action plan refresh with the IRM.

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²¹ Fontein, interview; Suijkerbuijk and van der Molen, interview.

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²⁴ “IRM Overview,” Open Government Partnership, <https://www.opengovpartnership.org/irm-guidance-overview/>.

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