Thirty Days

Chapter II The Switzerland of the Karst

A request for generalised civic access to the economic and asset-related documents of the Municipality of Monrupino-Repentabor received a complete refusal on 11 September 2026. This chapter reconstructs the request, the Municipality's four reasons, the request for review and the correction submitted by the applicant. In the documents considered here, the outcome of the review remains open.

Two pages

11 September 2026.

At 09:32, a message from the Municipality of Monrupino-Repentabor arrives in the certified electronic mailbox.

The attachment to the message was brief: two pages.

The title, in capital letters, left little room for interpretation:

DECISION REFUSING THE REQUEST FOR GENERALISED CIVIC ACCESS.

The Municipality stated that the request submitted one month earlier could not be granted.

There were four reasons.

Manifest disproportionality and excessive burden.

Indeterminacy and exploratory nature.

Processing not required of the administration.

Confidentiality concerns and the burden of redaction.

Read quickly, those four reasons could be reduced to a very simple story: a citizen asks, an administration says no.

But simple stories have a flaw.

They almost always remove the very part that is worth understanding.

The interesting question was not yet:

who is right?

It was another one.

What happens when a citizen asks to see the budgets, accounts and assets of their Municipality, and the abstract right to transparency encounters, in practice, archives, staff, privacy, procedures, deadlines and administrative capacity?

This is where the case stops being merely personal.

And this is where this chapter really begins.

Before judging, understand

The Switzerland of the Karst was not created to prove a thesis about the Municipality of Monrupino-Repentabor.

It was created to try to understand a territory.

And understanding meant, first of all, reconstructing the starting point.

Not the imagined one.

Not the one that was narrated.

The documented one.

How much does the Municipality invest?

What resources does it receive from outside?

How are revenues structured?

What assets does it own?

Which investments are already planned?

Which have been carried out?

Which funds have been set aside?

What is the structure of its debt?

How much does waste management weigh on the budget?

What economic relationships exist with entities and companies with municipal shareholdings?

Which projects already have regional, national or European funding?

These are less spectacular questions than a major international candidacy, an infrastructure project or a new economic strategy.

But they come first.

It is relatively easy to imagine a new project.

It is much harder to understand whether that project encounters an available or unavailable asset, an existing constraint, a planned investment, a competence belonging to another authority, a compatible financial structure, or a cost that no one had yet considered.

For this reason, the laboratory had begun collecting public documentation.

Some of it was available.

Some of it had not been located.

The difference matters.

Not finding a document online does not mean that the document does not exist.

It does not mean that it was never created.

It does not mean that someone hid it.

It means only that, in the search carried out, that document was not found.

This may seem like linguistic caution.

It is not.

It is exactly the difference between verification and assumption.

And when the document search reached the limit of what was directly available, it encountered an instrument provided for by Italian law.

Generalised civic access.

11 August

It was the night of 11 August 2026.

The certified electronic mail system receipt records acceptance of the message at 02:17:49.

One second later, at 02:17:50, its delivery to the Municipality of Monrupino-Repentabor's institutional PEC mailbox was certified.

The message identifier makes the sequence documentable.

It is a distinction that will matter later.

A PEC receipt, in fact, does not certify that someone physically opened a message and read its contents at that precise moment.

It certifies sending and delivery according to the functioning of the system.

The subject of the request was:

Request for generalised civic access pursuant to Article 5(2) of Legislative Decree 33/2013 - Request for documentation for the civic project Karst UNESCO 2035.

The document immediately clarified something else as well.

KARST UNESCO 2035 was defined as an independent civic project.

Not an official candidacy.

Not an institutional project of the Municipality.

Not an initiative officially recognised by UNESCO.

That clarification served to separate a project hypothesis from institutional reality.

The request concerned economic, financial, asset and planning documentation relating to the financial years from 2020 to 2025.

It was divided into nine broad areas:

year-end management accounts;

forecast budgets and planning documents;

budget amendments, adjustment and safeguarding of budget balance;

tax and non-tax revenues;

TARI and management of the waste service;

cash position, outstanding balances, funds and debt;

municipal assets;

entities and companies with municipal shareholdings;

investments and external funding.

The detailed list was much longer.

The management accounts alone contained twenty-eight items.

The forecast budgets contained twenty-three.

Then came the other categories.

Inventories.

Outstanding balances.

Funds.

TARI financial plans.

Equity interests.

Loans.

Funding.

Public works programmes.

Economic frameworks.

Grants.

Timelines.

Reports and statements of expenditure.

Overall, the request was very broad.

A very broad request

The breadth of the request, however, was only one part of the document.

The other part concerned the way that breadth was supposed to be managed.

The request and its Annex 1 stated that they referred exclusively to documents, data and statements already created and held by the Administration.

The offices were not being asked to produce new documents.

No specially created statistics were requested.

There was no request to aggregate information held only in disaggregated form.

There was no request to prepare new reports.

No personal data relating to individual taxpayers, employees, users or other persons were requested.

To contain the organisational impact, several methods of response were also expressly accepted.

Progressive transmission.

Division by year or subject matter.

A simple direct link where the document was already published.

Selective redaction of information that could not be disclosed.

A brief communication where a document had not been created, was not held by the Municipality, or was no longer retained.

An order of priority was also provided for, which could be changed in agreement with the Economic and Financial Service.

First, the 2024 management account.

Then the 2021 and 2022 management accounts.

Then the missing or supplementary annexes for 2023.

And subsequently the other categories.

This did not automatically make the request manageable.

It is important to avoid the opposite error as well.

An archive can require a great deal of work even when documents are delivered in several batches.

The fact that a document is digital does not necessarily mean that it is immediately retrievable.

Checking for the presence of personal data may take time even when the person making the request says they do not wish to receive such data.

A document described in one way by the applicant may be classified differently by the administration.

And even establishing that a particular statement does not exist may require verification.

The point, therefore, was not to prove in the abstract that the request was easy to satisfy.

It was something else.

On one side there was an objectively very broad request.

On the other, an explicit attempt to modulate the way it was handled.

The real question became:

how much work would actually be required to satisfy it, at least in part?

That question could not be answered simply by counting the pages of the request.

The archives were needed.

Knowledge of the organisation of the offices was needed.

It was necessary to know which documents were already digital, which were published, which were immediately retrievable and which instead required searches, checks or redactions.

In other words, what was needed was exactly what the applicant, from outside, could not fully know.

That was where the first real tension in the case emerged.

Thirty days

Article 5 of Legislative Decree 33 of 2013 provides that the civic access procedure must be concluded with an express and reasoned decision within thirty days of submission of the request.

The rules also provide a specific mechanism when third parties whose interests may be affected are identified.

The laboratory made its own calculation.

The PEC had been delivered on 11 August.

Excluding the initial day, the applicant calculated the deadline as 10 September 2026.

By the deadline calculated in this way, no express decision appeared to have been communicated.

Based on the communications received, there also appeared to have been no notice that a procedure involving any affected third parties had been initiated, nor of any resulting suspension.

The wording must remain exactly this.

Because the book does not know what happened internally within the offices between 11 August and 10 September.

Perhaps searches had begun.

Perhaps the request had been discussed.

Perhaps several offices had been involved.

Perhaps an assessment of the workload had been carried out.

Perhaps the summer organisation of the offices had created difficulties.

Or perhaps not.

Without documents, we cannot turn a possibility into a fact.

We do not know.

We can know only what emerges from the available records and from the communications received.

It is a simple distinction, but a decisive one.

The citizen sees the deadline as a timeline.

Day one.

Day two.

Day thirty.

The administration lives those same thirty days within an overlap of activities.

Budgets.

Staff.

Procurement.

Maintenance.

Services.

Procedures.

Deadlines.

Holidays.

Emergencies.

Requests from other citizens.

Cases to be processed and decisions to be taken.

This does not mean that a deadline laid down by law ceases to exist when an office has a heavy workload.

It does mean, however, that behind an apparently simple date there is always an organisation.

And it was precisely here that a question about access to documents began to meet a much larger issue.

Administrative capacity.

11 September

The following morning, the decision arrived.

09:32.

The Municipality communicated a complete refusal of the request.

Not a limitation referring to a single group of documents.

Not partial access.

Not a postponement.

The refusal concerned the request as a whole.

There were four reasons.

The first: manifest disproportionality and excessive burden.

The second: indeterminacy and exploratory nature.

The third: a request for processing not required of the administration.

The fourth: confidentiality concerns and the burden of redaction.

At that point it would have been very easy to choose a narrative.

The first:

the citizen asks for transparency and bureaucracy closes the door.

The second:

the citizen submits an unmanageable request and the administration is forced to defend itself.

Both have the advantage of simplicity.

And for that very reason, both explain little.

The method of the book required a more demanding path.

Take the refusal seriously.

Not in order to accept it automatically.

Nor to reject it automatically.

But to understand what it actually contained.

How much can a citizen ask for?

The first reason started with the numbers.

Nine broad areas.

Six financial years.

Twenty-eight items for the management accounts.

Twenty-three for the forecast budgets.

Then all the others.

According to the decision, the overall breadth of the request created an unreasonable workload capable of interfering with the proper functioning of the Administration.

The Municipality cited in support judgment no. 7973 of 2025 of the Council of State, Third Section.

The principle invoked does exist.

Generalised civic access cannot be turned into an activity that imposes a manifestly unreasonable burden on the administration to the point of compromising its regular operation.

So one possible response had to be ruled out immediately.

It was not correct to say:

a Municipality can never invoke excessive burden against a request for generalised access.

It can.

But the opposite statement was not sufficient either:

there are many documents, therefore the request is necessarily unmanageable.

Between those two statements lay the part that really mattered.

How many documents were already online?

How many were already in digital format?

How many requests could be satisfied simply by providing a link?

How many were immediately retrievable?

How many required archive searches?

How many contained personal information that had to be checked or redacted?

How many actually involved affected third parties?

How many working hours would the overall handling of the request have required?

How many people would have had to work on it?

Which sectors of the administration would have been involved?

The decision described the scale of the request.

In the reasons communicated, however, these elements were not quantified.

This did not, by itself, prove that the Municipality was wrong.

It showed something more limited.

From the outside, it was not possible to understand how the abstract breadth of the request had been translated into a concrete assessment of a manifestly unreasonable burden.

The question therefore became more precise:

how much can a citizen ask before the right to know becomes, for the administration required to guarantee it, a disproportionate cost?

The law can define the principle.

The concrete threshold, however, lives inside the archives and inside the organisation.

When does a request become exploratory?

The second reason concerned the precision of the request.

The decision referred to expressions contained in Annex 1:

"additional annexes kept in the file".

"any existing statements".

"additional summary statements".

According to the Municipality, wording of this kind amounted to delegating to the offices an exploratory search through the archives.

Here, the applicant's position had a real weakness.

Those expressions were there.

One only has to read Annex 1.

Ignoring them because they were inconvenient would have contradicted the method declared by the book.

But those expressions did not coincide with the entire request.

Alongside the open-ended wording were many categories identified with precision:

resolutions;

the budget outturn account;

reports of the audit body;

SIOPE statements;

TARI financial plans;

asset disposal plans;

inventories;

public works programmes;

acts relating to equity interests;

acts granting funding;

timelines;

reports and statements already prepared.

The problem, therefore, could not be reduced to an absolute either-or choice.

The request was not entirely precise.

But neither was it entirely indeterminate.

It contained both.

Named items.

And residual clauses that could be improved.

The real issue became severability.

If some wording is too open-ended, must it necessarily make every other category exploratory as well?

The case brought out a small paradox.

To ask for a document with absolute precision, one would often need to know in advance what the administration calls it, whether it exists as a separate document, where it is kept and which office holds it.

But sometimes access is requested precisely because that knowledge is missing.

On the other hand, an administration cannot be required to interpret as a documentary request something equivalent to:

search the archives for anything that might interest me.

Between these two extremes lies the space of attainable precision.

And it was precisely there that the procedure would begin to change.

Document or new processing?

The third reason moved the discussion onto an even finer boundary.

The Municipality observed that some items - for example, "already available aggregated data relating to user categories" or "reconciliation statements between the inventory and the balance sheet" - might have required extraction and aggregation not available as stand-alone documents.

The principle, here too, is understandable.

Civic access concerns data and documents held by the administration.

It cannot automatically turn public offices into a service required to produce new statistical or accounting analyses.

But the request itself contained an explicit premise.

Do not produce new documents.

Do not process data that are not already available.

Do not prepare statistics, reports or special statements.

Do not aggregate information held only in disaggregated form.

Many items also used wording such as:

"already available".

"where existing".

"where already prepared".

"where shown in existing statements".

The issue could be reduced to three cases.

First.

The document already exists and is held by the Municipality.

The document is requested.

Second.

The document has never been created.

There is no request to create it.

Third.

Only raw information exists, and producing what is requested would require a new activity of aggregation or processing.

The offices are not being asked to carry it out.

The answer, therefore, is not found only in the wording of the request.

It is found in the archive.

Does that document exist or not?

For a territorial project, this is an important lesson.

Not everything that would be useful to know already exists in the form in which we would like to read it.

Sometimes the real problem is not access to the information.

It is the way the information is structured.

Transparency and privacy

The fourth reason concerned personal data.

Among its examples, the Municipality mentioned lists of outstanding balances containing the names of creditors or debtors, tax assessment activities, and relationships with entities and companies with municipal shareholdings.

According to the decision, the documentation would have required substantial redaction work and possible involvement of affected third parties.

Here, two legitimate needs clearly met.

On the one hand, some administrative and accounting documents may contain information relating to natural persons.

On the other, the original request expressly excluded personal data referring to individual taxpayers, employees, users or other persons.

In the section devoted to tax revenues, it specifically referred to aggregated data.

And among the methods of response, it provided for the redaction of information that could not be disclosed and access to the remaining parts.

The rules governing access contain a principle of severability for the parts that can be disclosed.

But here too, a principle should not be confused with operational ease.

Redaction may mean opening a document, reading it, identifying problematic data, understanding the context and intervening on the copy to be transmitted.

Repeated many times, this activity can become significant.

Privacy, therefore, is not by definition a bureaucratic excuse.

It is a protected interest.

At the same time, the presence of some personal information does not automatically make every document wholly inaccessible.

The correct question was not:

privacy or transparency?

It was:

what balance makes it possible to protect what must be protected without withholding what can be known?

It is a question surprisingly similar to many others that run through The Switzerland of the Karst.

Environment or economy?

Identity or openness?

Conservation or innovation?

Procedure or development?

Perhaps the problem begins precisely when two real needs are turned too quickly into a binary choice.

A procedure, not an accusation

The refusal decision expressly indicated one of the available remedies.

A request for review by the RPCT.

The acronym can create a misunderstanding.

Officer for Corruption Prevention and Transparency.

The title might suggest that approaching this official means making an accusation of corruption against the Municipality, an elected representative or an official.

It does not.

In generalised civic access, the law assigns the RPCT a specific review function.

It is a procedural stage.

Not an accusation.

The distinction matters, especially in a small territory, where administrative acts, personal relationships and public perceptions can easily overlap.

Asking for a decision to be reviewed is not the same as claiming that the person who made it acted with improper motives.

It means using one of the remedies provided by the system itself.

On 11 September, a few hours after the refusal was communicated, a request for review was sent.

And it is precisely here that the chronology forces this book to do something less comfortable.

Correct itself.

The detail that changes the chronology

The request for review of 11 September had been built around the absence of a response by the deadline that the applicant had calculated as 10 September.

The document stated that, at the time it was submitted, no express decision appeared to have been received: wording that the later PEC receipts required to be corrected.

But the complete reconstruction of the PEC messages showed something else.

The refusal had been communicated to the certified mailbox at 09:32 on 11 September.

The request for review was sent later that same day, at 13:48.

The corresponding receipt certifies delivery to the Municipality at 13:52:54.

Therefore, at the time the review request was actually sent, an express refusal had already been delivered to the applicant's PEC mailbox.

That sentence did not correctly describe the documentary sequence.

It is a detail of only a few hours.

But for the method of the book, it is not a small detail.

The Preface to this book had stated that verification means accepting the possibility of discovering that one's own reconstruction must be changed.

That principle cannot work only when it is useful for correcting others.

The review

The error in the chronological reconstruction did not make the issue disappear.

By the deadline calculated as 10 September, no express decision appeared to have been communicated.

And a few hours later, an express refusal nevertheless existed.

Among other things, the request submitted on 11 September asked for consideration of:

progressive transmission;

partial access;

selective redaction;

identification of documents not created or not held;

specific reasons for any limitations.

In the alternative, it proposed beginning at least with the documentation already available in digital format and with the documents identified as priorities.

Formally, the review request had arisen within a reconstruction centred on the lack of a response by the deadline.

The appearance of the refusal, however, shifted the issue.

There was now a decision to analyse.

Four reasons.

Four different problems.

And a broader question:

did those problems necessarily justify the complete refusal of the entire request, or could they be distinguished from one another?

This would become the central issue on 24 September.

The first document of 24 September

On 24 September 2026, at 15:26, a new communication was sent.

Its subject was:

Courtesy response to the refusal decision - request for generalised civic access of 11 August 2026.

The title matters.

Because that document did not present itself as a new request.

Nor as a formal supplement to the request for review.

It was a response to the officer in charge of the procedure.

The tone was deliberately institutional.

The communication began by thanking the Administration, the offices and the officer in charge of the procedure for nevertheless having provided an express response.

It then addressed the four reasons for refusal one by one.

On excessive burden, it acknowledged the relevance of the principle cited by the Council of State, but observed that the reasons received did not indicate elements such as the actual number of documents to be retrieved, the share already available digitally or published, estimated working hours, the archives to be consulted, the staff involved or the extent of the redaction operations.

On indeterminacy, it acknowledged that some residual expressions such as "additional" and "any" could have been formulated more precisely.

On processing, it reiterated that expressions such as "already available", "where existing" and "where already prepared" had been used precisely to make the request conditional on the prior existence of the document or data.

On privacy, it recalled that the request had excluded individual data and had provided for the redaction of information that could not be disclosed.

Finally, it pointed out a technical inaccuracy in the decision.

The refusal attributed communication to any affected third parties to Article 5(6).

The specific rules on communication to affected third parties are instead contained in paragraph 5.

The response expressly stated, however, that it did not attribute independent or decisive significance to that point.

It was a technical clarification.

Not a conclusion on the overall validity of the refusal.

But perhaps the most important part was in the final lines.

The document stated that it was interlocutory in nature and expressly specified that it:

did not constitute a supplement, amendment or replacement of the request for review already submitted.

The sentence apparently left a problem open.

If the response did not supplement the review, in what document would the chronology be formally corrected?

The answer came a few hours later.

At 20:12

On the evening of the same 24 September, a second document was sent.

This time, the title left no doubt:

Supplement, clarification and correction of the request for review pursuant to Article 5(7) of Legislative Decree 33/2013 of 11 September 2026 - review of the refusal decision concerning the request for generalised civic access, protocol no. 3535 of 11 August 2026.

The PEC appears to have been sent at 20:11.

At 20:12:33 the system certifies its delivery to the institutional mailbox of the Municipality of Monrupino-Repentabor.

This time there was no ambiguity about the function of the document.

The three central words were:

supplement.

clarification.

correction.

The document asked to be placed on the file of the review already pending and assessed together with the request of 11 September.

But above all it did something that, for this book, matters more than its procedural effect.

It put the correction in writing.

Not in a marginal note.

Not only in the later narrative.

Within the procedure itself.

The first section expressly stated that the assertion contained in the request of 11 September had to be corrected.

The refusal had already been communicated at 09:32.

The review request had been sent later.

The applicant formally acknowledged this.

It is difficult to find a passage more faithful to the method declared in the Preface.

Verification also means leaving a formal record of the correction.

Correcting without rewriting the story

The supplementary document carefully distinguished two issues.

The first was chronology.

On that point, there was no room left for a more favourable reconstruction.

The refusal preceded the sending of the review request.

The second issue was the deadline for the original procedure.

The request had been delivered on 11 August at 02:17:50.

The applicant maintained his calculation of the ordinary deadline as 10 September and observed that, by the date so identified, no express decision appeared yet to have been communicated.

If a suspension involving affected third parties had been formally initiated, the document simply asked that its relevant dates be indicated.

It is a methodologically important passage.

Correcting one thing does not necessarily mean abandoning another.

It is possible to acknowledge that one sentence was wrong and, at the same time, retain a separate question that remains open.

The supplementary document also avoided turning any possible exceeding of the deadline into an automatic conclusion about the validity of the refusal.

That mattered too.

A clause against formalism

The supplementary document then addressed a delicate procedural issue.

Primarily, it asked to be treated as a supplement to the review already initiated.

But it added a subsidiary clause.

If the RPCT considered that the express refusal of 11 September could not be examined within the already pending review through a simple supplement, the same communication asked, insofar as necessary, to be treated as a timely request for review of that same refusal.

The wording was precautionary.

It did not claim to decide in advance which procedural classification was correct.

Instead, it sought to prevent a discussion about form from making an assessment on the merits impossible.

For the book, the lesson is interesting.

Procedural rights also need architecture.

Having a substantive reason is not enough.

That reason must enter the procedure through the correct door.

A date.

A recipient.

A PEC.

A legal classification.

A request formulated in the appropriate terms.

They are details until the moment they become decisive.

Narrowing the request to make it more precise

The supplementary document also did something that the first review request had not yet done formally.

It narrowed the scope.

The expressions that the Municipality had cited as examples of indeterminacy - "additional annexes", "additional statements", "any statements" and equivalent wording - were no longer defended indiscriminately.

The document specified that it would not insist on those residual expressions alone insofar as they entailed an open-ended exploratory search through the archives.

It was a limited concession.

But a significant one.

The categories specifically identified by name, content, subject matter or reference period remained unchanged.

And documents indicated as "where existing", "where already prepared" or equivalent wording also remained within the request where their existence could be verified directly without turning the search into an indefinite exploration.

The central sentence is almost a definition of method:

narrow the scope without changing the subject.

Do not insist on everything simply because it was written at the beginning.

Do not add new documents to compensate for what is removed.

Take a serious criticism.

Assess it.

And, when it is at least partly well founded, modify the request.

That is exactly what a laboratory should do.

Not all documents have the same problem

Perhaps the most important passage in the supplementary document was the one devoted to distinguishing between categories.

The refusal had identified different problems.

Some wording was said to be too general.

Some statements would have required new processing.

Some documents might have contained personal data.

The request as a whole was said to be excessively burdensome.

Different problems.

One conclusion:

complete refusal.

The supplementary document instead asked the RPCT to distinguish at least between:

documents already published;

digital documents that were immediately retrievable;

specifically identified documents;

documents that had not been created;

documents that would require new processing;

documents containing personal data that could be redacted;

documents in relation to which there were actual affected third parties;

categories that truly presented a manifestly unreasonable burden.

Here the administrative case meets the logic of the territorial project directly.

Not everything belonging to a single set must necessarily receive the same answer.

A complex project may contain one unworkable component and others that are perfectly feasible.

A strategy may be too costly in one part and sustainable in another.

A piece of land may be unusable for one purpose and strategic for another.

A documentary request may contain one problematic item and one hundred simple ones.

The method consists precisely in separating them.

The document before the reader

This case also led to an editorial choice.

To make the refusal available for consultation, if it can be published, rather than merely describing it.

If The Switzerland of the Karst invites the reader to verify what they read, it must make available the sources it can publish, while respecting any protected data.

The decision contains the Administration's reasons.

The request contains the applicant's reasons.

The review request contains his objections.

The interlocutory response of 24 September adds a first clarification.

The formal supplementary document adds a correction, a delimitation and a new structure for the requests.

The reader can read.

Compare.

And even reach a conclusion different from the author's.

That is not a loss of control.

It is transparency.

The philosophy remains the one declared from the beginning.

Not:

believe me.

But:

verify.

The cost of knowing

The case was beginning to show something that went far beyond the right of access.

Transparency has a cost.

Not necessarily in the economic sense of a price imposed on the citizen.

In an organisational sense.

Making a documentary archive genuinely accessible requires orderly archives.

Consistent classifications.

Protocols.

Digital systems.

Preservation.

Staff.

Skills.

The ability to retrieve quickly a document created years earlier.

The ability to distinguish what can be disclosed from what must be protected.

The ability to know where information is located.

The law can recognise a right.

But between the written right and the concrete experience of that right there is an infrastructure.

A document already published can be indicated by means of a link.

A digitised and correctly classified document can be retrieved quickly.

A document stored in a fragmented way requires more time.

A system in which personal data and aggregated data can be structurally separated may make disclosure easier.

An archive in which everything is mixed together may require every page to be checked.

At that point, transparency ceases to be only a legal matter.

It becomes an organisational problem.

And therefore, inevitably, a development problem.

The right to ask and the duty to administer

A case of this kind easily invites a moral conclusion.

The citizen has a right to know.

The administration must be able to function.

A request should not paralyse the offices.

Workload should not become a generic formula capable of making any complex body of documents inaccessible.

Privacy must be protected.

Where possible, the unprotected parts must remain knowable.

All these statements can be true at the same time.

And that is precisely why procedures, reasons and review mechanisms exist.

Not because the procedure is perfect.

Not because it automatically produces the best decision.

But because, when legitimate interests come into tension, a method is needed to decide.

It is a less spectacular lesson than a UNESCO strategy, a major investment or a new territorial project.

But perhaps it is one of the most important.

Development does not require vision alone.

It requires institutions capable of managing different needs at the same time.

Knowing and protecting.

Opening and limiting.

Responding and giving reasons.

Proposing and verifying.

Seen from this perspective, procedure was not an incident along the road of the project.

It was part of the road.

An answer still open

At 20:12:33 on 24 September 2026, the PEC receipt certified delivery of the supplementary document. By then the file included the request, the refusal, the review request, the interlocutory response and the formal correction. In the documents considered for this chapter, the final decision on the review does not yet appear. The story must stop here, without anticipating its outcome.

One thing, however, does emerge from the sequence: the refusal preceded the sending of the review request, and the applicant formally corrected his reconstruction. The Municipality's four reasons still have to be assessed, together with the possibility of distinguishing documents that are already

available from those whose search, processing or protection would be particularly burdensome. The project must restart from this verification, not from an imagined conclusion.

Essential notes and sources

1. Request for generalised civic access of 11 August 2026. Submitted to the Municipality of Monrupino-Repentabor within the independent civic project Karst UNESCO 2035, with a detailed annex relating to the financial years 2020-2025.

2. Annex 1 to the request. List divided into nine broad areas, with document categories, proposed operating methods and order of priority.

3. PEC receipts of 11 August 2026. Acceptance at 02:17:49 and delivery at 02:17:50, according to the reconstruction contained in the manuscript.

4. Legislative Decree no. 33 of 14 March 2013, Articles 5 and 5-bis. Rules governing civic access, the procedure, review and the limits on access.

5. Municipality's refusal decision, communicated on 11 September 2026. Reasons referred to in the manuscript: excessive burden, indeterminacy, new processing, confidentiality and redactions.

6. Council of State, Third Section, 10 October 2025, no. 7973. Decision cited by the Municipality's refusal in relation to manifestly burdensome or disproportionate requests.

7. ANAC, Determination no. 1309 of 28 December 2016. Guidelines on exclusions from and limitations on generalised civic access.

8. Department of Public Administration, Circular no. 2 of 2017. Operational guidance on generalised civic access.

9. Request for review of 11 September 2026. PEC sent at 13:48 and delivered at 13:52:54, according to the reconstruction contained in the manuscript.

10. Courtesy response to the refusal of 24 September 2026. Interlocutory communication sent at 15:26; it states that it does not amend or supplement the review request.

11. Supplement, clarification and correction of the review request of 24 September 2026. Document addressed to the RPCT correcting the chronology, narrowing the residual clauses and requesting a differentiated assessment.

12. PEC receipt of 24 September 2026. Delivery of the supplementary document at 20:12:33, according to the reconstruction contained in the manuscript.