

XIX

ARTICLE 19

GLOBAL CAMPAIGN FOR FREE EXPRESSION

Pecuniary Awards

(Work in Progress)

Country	Pecuniary amount
Afghanistan	
Albania	Criminal: approx. US\$33,950.
Algeria	2,500,000 Algerian Dinars (US\$35,500)
American Samoa	
Andorra	
Angola	
Anguilla	
Antigua and Barbuda	
Argentina	Criminal: US\$317-\$31,704 Civil: at discretion of judge.
Armenia	
Aruba	
Australia	Up to A\$250,000 (US\$207,130) (annually adjusted) for damages for non-economic loss. No limit for aggravated damages.
Austria	Criminal: 360 days' income.
Azerbaijan	Civil: no more than 3 months' expenses. Criminal: approx. US\$1,150.
Bahamas	
Bahrain	Up to 5,000 Bahraini Dinars (US\$13,250).
Bangladesh	
Barbados	
Belarus	Civil: no limit. Criminal: US\$10,000.
Belgium	Civil: no limit. Criminal: Euros;1,000 (approx. US\$1,360).
Belize	
Benin	
Bermuda	
Bhutan	Up to three times the national minimum annual wage.
Bolivia	Up to 240 days' income.
Bosnia and Herzegovina	Civil: no limit. Criminal: US\$6,800.
Botswana	Maximum: 400 Pula (against officials) or P500 (against symbols).
Brazil	Criminal: To be fixed by the judge under the following parameters: - 10 to 360 days wages - The value of the per day rate is fixed by the judge but cannot be inferior to 1/30 of the current minimum wage and not superior to 5 multiples of the minimum wage.

	Civil: No ceiling but average damages are around US\$40,000, but amounts have reached up to US\$1,000,000.
Brunei Darussalam	
Bulgaria	Criminal: max. US\$10,200.
Burkina Faso	
Burma	Max. 20,000 Kyats (US\$3,100).
Burundi	
Cambodia	Up to 10 million Riel (US\$2,600).
Cameroon	
Canada	No formal limit.
Cape Verde	
Cayman Islands	
Central African Republic	
Chad	Approx. 502,900 CFA Francs BEAC (US\$1,000).
Chile	Up to 150 days' income.
China	Individuals: 5,000 Yuan (US\$650). Organisations: 15,000 Yuan (US\$1,950).
Colombia	
Comoros	
Congo	
Congo, Democratic Republic of	Up to US\$6,000 recorded.
Cook Islands	
Costa Rica	20-150 days' income.
Cote d'Ivoire	About Euros 30,500 (US\$41,470).
Croatia	Criminal: max. 150 days' income.
Cuba	
Cyprus	Civil: no limit; average: 10,000 - 30,000 CYP (US\$23,360 - US\$70,100).
Czech Republic	Criminal: approx. US\$228,140.
Denmark	No limit.
Djibouti	
Dominica	
Dominican Republic	
Ecuador	US\$6 - \$19 (simple defamation), \$44 - \$87 (defamation of public institutions/officials).
Egypt	30,000 Egyptian Pounds (US\$5,300).
El Salvador	
Equatorial Guinea	
Eritrea	
Estonia	Criminal: up to 500 days' income.
Ethiopia	
Fiji	
Finland	Civil: no limit. Criminal: 120 unit fines.
France	Criminal: Euros 45,000 (US\$61,080).
French Guinea	
French Polynesia	
Gabon	
Gambia	250,000 Dalais (US\$8,800).
Georgia	No limit; average: US\$2,000 - US\$25,000.
Germany	Civil: Euros 1,000 – euros 35,000 (US\$1,360 - US\$47,520). No ceiling on civil or criminal fines.

Ghana	Up to 120 million Cedis (US\$13,043).
Greece	Civil: varied minimum rates depending on media. Criminal: Euros 15,000 (US\$20,370).
Greenland	No limit.
Grenada	
Guadeloupe	
Guam	
Guatemala	
Guinea	
Guinea-Bissau	
Guyana	
Haiti	
Holy See	Civil: no limit. Criminal: varied rates depending on type of libel.
Honduras	15,000.00 - 30,000.00 Lempiras (US\$796,000 - 1,592,000).
Hong Kong	No upper limit.
Hungary	Civil: no limit. Criminal: approx. US\$58,970.
Iceland	
India	
Indonesia	
Iran, Islamic Republic of	50,000 to 1,000,000 Ryal (US\$ 5.4 to 10.8) for insults. 1,500,000 to 6,000,000 (US\$160.8 to US\$643.2) for publishing materials.
Iraq	100 Dinars (US\$0.8)
Ireland	Euros 635 (US\$860)
Israel	Without proving charges: max. 50,000 NIS (US\$12,418). If acquitted then max. 100,00 NIS (US\$24,828).
Italy	Civil: no limit.
Jamaica	
Japan	No upper limit. Largest amount awarded: 10 million Yen (US\$84,000).
Jordan	28,000 Jordanian Dinars (US\$39500).
Kazakhstan	Civil: no limit. Criminal: max. US\$40,000.
Kenya	
Kiribati	
Korea, Democratic of Republic's	
Korea, Republic of	Up to 50 million Won (US\$54,000).
Kuwait	20,000 Kuwaiti Dinars (\$69,177).
Kyrgyzstan	Criminal: max. US\$2,720.
Lao, People's Republic of	
Latvia	Civil: no limit. Criminal: 6 times minimum monthly wage (US\$9,850).
Lebanon	1 million Lebanese Pounds (US\$662).
Lesotho	High financial fines awarded in courts and large sums also awarded in private settlements.
Liberia	One case of fines up to US\$2 million.
Libyan Arab Jamahiriya	
Liechtenstein	Civil: no limit. Criminal: max. 360 days' income.
Lithuania	
Luxembourg	Criminal: Euros 10,000 (US\$13,580).
Macao	
Macedonia, Former Yugoslavia	Civil: Euros 5,000 (US\$6,790). Criminal: no limit.
Madagascar	

Malawi	
Malaysia	
Maldives	
Mali	Approx. 48,300 CFA Francs BCEO (US\$100)
Malta	Civil: approx. US\$15,900. Criminal: US\$1,590.
Marshall Islands	
Martinique	
Mauritania	
Mauritius	
Mayotte	
Mexico	Determined by judge.
Micronesia, Federated States of	
Moldova, Republic of	Civil: no limit. Criminal: US\$320 - US\$800.
Monaco	
Mongolia	Up to 200 times the national minimum daily wage.
Montenegro	Criminal: US\$19,000.
Montserrat	
Monaco	
Morocco	US\$354,000 for damages and US\$11,800 fine.
Mozambique	
Namibia	
Nauru	
Nepal	Civil: no limit. Criminal: 5,000 rupees (US\$75).
Netherlands	Civil: no limit. Criminal: Euros 11,250 (US\$15,280).
Netherlands Antilles	
New Caledonia	
New Zealand	Criminal: N/A Civil: Damages can run into tens of thousands of dollars. Recent awards have amounted to as much as US\$96,000, US\$207,000 and US\$216,000 .
Nicaragua	Up to 75,000 cordobas (\$4,110).
Niger	
Nigeria	
Niue	
Northern Mariana Islands	
Norway	Civil and criminal: no limit.
Oman	2,000 Omani Rials (US\$5,195).
Pakistan	50,000 Rupees (US\$825).
Palau	
Palestinian Territory, Occupied	200 Jordanian Dinars (US\$282).
Panama	20-100 days' income.
Papua New Guinea	
Paraguay	Determined by judge.
Peru	360 days' income.
Philippines	US\$25 fine, but damages of millions of Pesos (several million US\$).
Poland	Civil: no limit. Criminal: approx. US\$220,080.
Portugal	
Puerto Rico	
Qatar	3,000 Qatari Rials (US\$824).
Reunion	
Romania	Civil: no limit. Criminal: US\$3,970.

Russian Federation	Civil: no limit. Criminal: 100-200 days' minimum wage, or one month's salary.
Rwanda	Fine of US\$10,000, but not paid after appeal.
Saint Kitts and Nevis	
Saint Lucia	
Saint Vincent and Grenadines	
Samoa	
San Marino	Criminal: US\$2720.
Sao Tome and Principe	Acceptable fines or mutual agreement.
Saudi Arabia	50-100 000 Ryals (US\$ 20,057.39)
Senegal	
Serbia	Civil: no limit. Criminal: approx. US\$16,980.
Serbia: Kosovo	Maximum in 2004: Euros 1,350 (US\$1,840).
Seychelles	
Sierra Leone	
Singapore	Can be very high; used to bankrupt opposition politicians so they cannot run for office, and also against foreign publications.
Slovakia	Civil: no limit. Criminal: US\$169,800.
Slovenia	
Solomon Islands	
Somalia	
Somaliland	
South Africa	
Spain	Neither civil law nor criminal law contain ceilings for fines or damages that can be imposed. In practice, damages and fines vary greatly depending on specifics of the cases.
Sri Lanka	
Sudan	US\$250 plus US\$3,000 compensation.
Suriname	
Swaziland	Max. fines 120,000 Lilangeni (US\$19,350) have been awarded.
Sweden	Criminal cases: No Limit in the law Civil cases: No Limit in the law Damages are low: a typical amount would be 10,000 to 20,000 Swedish Crowns (ie. 1,500-3,000 USD), but they never exceed 100,000 Crowns (30,000 USD)
Switzerland	Civil law: no limit for damages defined by law; damages/ compensations vary greatly depending on the specifics of the cases Criminal: for the gravest form of defamation the law allows for a max. of 360 rates of daily income (daily income according to the law can be max. 3,000 Swiss Franks = 2,500 USD), but in practice fines are low – between 100 and 3,000 Swiss Franks (85 – 2,500 USD)
Syrian Arab Republic	1,000 - 2,000 Syrian Lira (US\$36.42 - \$72.87).
Taiwan, Province of China	
Tajikistan	Civil: No limit. Criminal: US\$2,600.
Tanzania, United Republic of	Mainland Tanzania: maximum 10,000 Tanzanian Shillings (US\$ 660,000).
Thailand	Usually 5 million Baht (US\$150,000), but could go higher in high-profile cases.
Timor-Leste	
Togo	Up to 5 million CFA Francs (approx. US\$10,200).

Tokelau	
Tonga	
Trinidad and Tobago	
Tunisia	1,200 Dinars (US\$930).
Turkey	Depends on media, and whether local or regional. Up to 250,000 NTL (US\$186,900).
Turkmenistan	Criminal: 30 average monthly wages, or US\$1,360.
Turks and Caicos Islands	
Tuvalu	
Uganda	Maximum 2005-07: 30 million Ugandan Shillings (US\$16,300).
Ukraine	Max. US\$10,000.
United Arab Emirates	20,000 UAE Dirhams (US\$5,445).
United Kingdom	Max. Euros 200,000 (US\$400,000).
United States of America	No formal maximum. Can be US\$ millions.
Uruguay	Up to 800 re-adjustable units of income.
Uzbekistan	Civil: No limit. Criminal: 100 days' minimum wage (approx. US\$1,000).
Vanuatu	
Venezuela	Up to 1,500 bolivares (0.70 USD).
Vietnam	
Virgin Islands, British	
Virgin Islands, US	
Wallis and Futuna	
Western Sahara	
Yemen	10,000 Yemeni Rials (US\$50).
Zambia	One case of 1 million Zambian Kwachas awarded (US\$255).
Zimbabwe	Civil: Fines subject to discretion of judge.