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**PROGRAMME AGAINST CORRUPTION AND ORGANISED CRIME IN SOUTH-EASTERN EUROPE (PACO)  
IMPLEMENTATION OF ANTI-CORRUPTION PLANS IN SEE (IMPACT)**

**PROJECT ASSESSMENT REPORT**

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## **Executive Summary**

This assessment report seeks to summarize the outcomes of Council of Europe's PACO Impact project, evaluated against its objectives and activities, and to identify the value-added from the countries' and regional points of view.

In agreement with the project donor, the Swedish International Development Cooperation Agency (Sida), an evaluation has been carried out two months before the end of the project through two parallel efforts: Sida has appointed an independent evaluator—the Institute for Public Management (IPM)—to focus on Albania, Kosovo, Montenegro, and Serbia; at the same time and complementary to the Sida evaluation, the Council of Europe has appointed this independent expert to assess the impact of the project focusing on Bosnia and Herzegovina, Croatia, “the former Yugoslav Republic of Macedonia,” and Serbia. The Council of Europe aims to apply the lessons learnt for future technical assistance and cooperation.

### ***Project Design***

The project's emphasis on national anti-corruption strategies and action plans, and bodies charged with monitoring their implementation was extremely timely and appropriate for South-Eastern Europe.

Project Outputs were defined to support the principal objective of contributing to the implementation and further elaboration of anti-corruption plans in countries of South-Eastern Europe. Initially, there was a greater accent on strengthening criminal legislation on corruption. However, the emphasis shifted to other relevant anti-corruption legislation in view of progress already made in the region. Flexibility was further maintained in defining specific activities during the Inception Phase in consultation with national counterparts. These and other programmatic shifts attest to the project's responsiveness to program area specificities, changing needs over time, and national stakeholders' views and priorities.

Project inputs were defined too modestly at the project design phase, which was confirmed during implementation. The proposed timeline was extremely ambitious considering the broad scope of activities over seven distinct project areas. Human resources were particularly modest, and project staff—from Strasbourg-based staff, Local Project Officers, to Country Project Directors—was stretched to the limit. Recognition is due for their extraordinary efforts to make this project a success. It would be advisable for future efforts to consider increasing the proportion of funds dedicated to human resources in order to strengthen their capacity to engage on technical issues, coordination and outreach activities, and internal assessments that would capture, analyze and distribute lessons from implementation.

Funding, though seemingly considerable (1.5 million EUR), was in fact rather modest for a project of this scale and duration: two year period, with six regional events, and activities in seven project areas (i.e. Albania, Bosnia and Herzegovina, Croatia, “the former Yugoslav Republic of Macedonia, Kosovo, Montenegro, and Serbia).

### ***Implementation***

The implementation of the PACO Impact project has yielded numerous valuable lessons, some of which are presented in this report. The key conclusions concern the following:

- Cooperation with national counterparts: State institutions often face human resource, financial, management and other constraints that can prevent them from fully cooperating in technical assistance efforts. Implementers and donors must do more to understand and accommodate these constraints to achieve maximum impact.
- Expert input: External expertise is highly valued by national counterparts, with marked preferences toward more long-term engagement and extensive regional knowledge. PACO Impact engagement of national and regional experts has been particularly well regarded in this respect.

- Regional events: Exchanges with counterparts from neighbouring countries continues to be viewed as extremely useful, particularly at the operational level, even the region increasingly looks to models from the EU. National partners should be consulted as to the most appropriate modes of exchange to best meet their needs and expectations.
- Trainings: Educational initiatives continue to be welcome, although there is increasing sophistication of project beneficiaries about the usefulness of particular forms of implementation. It is highly recommended that future projects seek to integrate one-off seminars into existing educational institutions and/or longer-term programs.
- Prevention and Outreach: Through the PACO Impact project, the Council of Europe has augmented its inventory of technical assistance instruments with a number of preventive and outreach measures. These deserve additional analysis with implementation, and a sharing of lessons learned throughout the region.

### ***Impact***

Today, the countries of South-Eastern Europe all have comprehensive anti-corruption strategies, thanks to a considerable extent to PACO Impact and previous Council of Europe projects. Of the four project areas examined in depth in this report, PACO Impact has played a crucial role in promoting the process of strategy formulation in Croatia and Serbia, and in improving drafted or existing plans in Bosnia and Herzegovina and FYR Macedonia. A momentum has also been created to transform these strategies into concrete action plans.

The initiative has furthermore increased awareness of the need for preventive and educational measures in addition to repressive ones, and has in a number of project areas supported prevention and outreach activities that can be further replicated. Other pilot activities, too numerous and diverse to cover in depth, have to various degrees helped improve the capacity of state institutions to fight against corruption.

Achievements to date—legal frameworks in compliance with international standards, and the anti-corruption strategies and action plans—are the foundations of an effective fight against corruption. *Future efforts should focus on promoting the implementation of these complex long-term plans.* Technical assistance continues to be needed, albeit on an increasingly sophisticated level. This opens new opportunities for regional cooperation (exchanges on difficulties in implementation, usefulness of particular interventions, and other lessons learned), and project area-level assistance on particular aspects of implementation.

Across the region, a momentum has been created to complete and implement anti-corruption action plans, due in part to PACO Impact, and perhaps more significantly due to the EU Stabilization and Association process. This is an opportunity that should not be missed.

# 1 INTRODUCTION

## 1.1 General Project Framework

In February 2004, the Swedish International Development Cooperation Agency (Sida) and the Council of Europe signed an agreement under which Sida agreed to finance the PACO Impact project aimed at the completion of anti-corruption plans in South-Eastern Europe up to an amount of 1.5 million EUR.

The project began on March 1, 2004, with an inception phase that lasted until July 31, 2004. The project had been implemented for a 27-month period at the time this assessment was taking place. As the specific have been detailed in a number of project documents, below is a summary of the principal project objectives and outputs.

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<b>Long-term objective:</b>	Strengthen democracy and the rule of law in South-eastern Europe through the prevention and control of corruption
<b>Project objective:</b>	To contribute to the implementation (and further elaboration) of anti-corruption plans in countries of South-eastern Europe

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<b>Output 1:</b>	<b>Anti-corruption plans improved or elaborated</b>
Activities:	<ul style="list-style-type: none"><li>▪ In-country working group meetings, workshops and training events and advice to improve or elaborate and operationalise anti-corruption plans (including clear benchmarks, indicators, and assignment of tasks, and reflecting a balance between law enforcement, prevention and public awareness/involvement)</li><li>▪ Regional seminars to allow for a mutual review of anti-corruption plans and experience exchange (in support of the aims of the SPAI)</li></ul>

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<b>Output 2:</b>	<b>Institutional mechanisms for the monitoring and management of anti-corruption plans strengthened</b>
Activities:	<ul style="list-style-type: none"><li>▪ Advice on legal basis, tasks, organisational set up and management of anti-corruption institutions</li><li>▪ Provide training for staff and advice to these institutions</li><li>▪ Provide basic equipment to these institutions (if necessary)</li><li>▪ Facilitate experience exchange and networking among anti-corruption institutions (in support of the aims of the SPAI)</li></ul>

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<b>Output 3:</b>	<b>Draft laws/amendments available to bring the criminal legislation on corruption in line with European standards</b>
Activities:	<ul style="list-style-type: none"><li>▪ Support review of criminal legislation</li><li>▪ Commission legal opinions</li><li>▪ Hold workshops/training events to discuss and finalise draft laws for submission to government</li></ul>

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<b>Output 4:</b>	<b>Pilot activities supported</b>
Activities:	<ul style="list-style-type: none"><li>▪ In each project area support the implementation of limited number of activities which are of high priority and impact, which could serve as examples or which could help create a momentum</li><li>▪ Regional seminars to provide access to best practice and disseminate experience gained in different countries.</li></ul>

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In accordance with the project document (February 2004), an evaluation of the project was foreseen to take place two months prior to the end of the project. This evaluation was carried out through two parallel efforts. On the one hand, Sida as the only donor appointed an independent evaluator, the Institute for Public Management (IPM). At the same time and complementary to the Sida evaluation, the

Council of Europe appointed this independent expert to assess the impact of PACO Impact, with the aim of applying the lessons learnt for future technical assistance and cooperation

The objective of the assessment presented in this report, therefore, is to appraise the overall impact of the project against the project's objectives and its activities, as set out in the project document, and its value-added and impact from the country and regional points of view. This report seeks to present the findings and conclude with strategic and operational-level recommendations (including the need for improvement) to the Council of Europe, which will be provided to the donor and posted on the PACO Impact web site.

## **1.2 Evaluation Methodology**

Anti-corruption project evaluations, particularly in early stages of anti-corruption efforts, should not attempt to measure project impact on the levels of corruption in a particular country. Such an approach would be highly problematic, for several reasons:

- Measurement challenges: it is very difficult to measure corruption; existing survey methodologies, above all perception surveys, are unreliable and inaccurate, particularly over the short terms; existing methodologies are relatively blunt instruments, more appropriate for tracking longer-term trends;
- Expense: surveys are very expensive to administer; yet, in order to measure change over the duration of the project period, they would need to be administered both before and after project implementation;
- Longer-term impact: projects focusing on strengthening the legal framework and institutions require time produce impact; results become visible only over the medium- to long-term; and,
- Attribution: projects are not implemented in a vacuum, and many externalities will influence outcomes; it is rather the sum of numerous reform efforts that will ultimately have an impact on the state of corruption.

An evaluation, therefore, must look to other indicators, including:

- Effectiveness of project design: quality of the situation and needs analysis, underlying assumptions, adequate risk assessment, appropriateness of inputs, and choice of instruments applied to reach particular intermediate objectives;
- Effectiveness of project management; and,
- Quality of outputs and limited outcomes of particular project segments.

This, as any other external evaluation, can provide only a limited view of project effectiveness, for several reasons:

- Distance: it is not based on first-hand experience of the project, but rather on evaluation of project documents and interviews with limited number of participants;
- Lack of interim assessments: there are no existing internal evaluation efforts of particular project segments to consult;
- Scope: the terms of reference specify a more in-depth assessment of only 4 of 7 project areas, and limited access to feedback about regional activities;
- Time/timing: limited time frame for carrying out the assessment, at the time the project, and all the planned activities, had not been completed.

These limitations notwithstanding, an external assessment such as this can provide some valuable feedback, including preliminary indications of project impact. What is ultimately important is that both external and internal evaluations be carried out part of a learning process. There is still a great deal to understand about which interventions are most effective under particular conditions. These lessons should be captured and shared widely for the benefit of the entire anti-corruption community in South-Eastern Europe and beyond.

### **1.3 Acknowledgements and disclaimers**

The author wishes to thank all project participants who have taken time from their work schedules to meet or talk by phone during the course of this assessment. Their frank and thoughtful comments constitute the core material presented here. A comprehensive list of persons consulted can be found as Annex III.

Special thanks are reserved for project staff in Strasbourg and in project areas visited for their assistance in travel and logistical arrangements, in addition to the considerable time invested in responding openly to direct and probing questions.

The views expressed are solely those of the expert and do not necessarily reflect the official position of the Council of Europe. Furthermore, the author bears all responsibility for any factual errors or inadvertent misrepresentations of views of persons consulted.

Finally, this report follows country name conventions adopted by the Council of Europe, and does not necessarily represent the preferences of the author.



## **2 FINDINGS**

### **2.1 Project design**

#### **2.1.1 Definition of Objectives and Outputs**

The project objectives and outputs represent a logical follow-up to Council of Europe previous activities in the region (PACO Albania and other initiatives), expanding on knowledge and expertise gained, and in response to an assessment of the remaining needs in the region as outlined in Group of States Against Corruption (GRECO) evaluations, Stability Pact Anti-Corruption Initiative (SPAI) reports, as well as corruption-related recommendations noted in regular reports on the EU Stabilization and Association process (SAP).

These documents, and Council of Europe previous technical assistance efforts, have underscored the law enforcement aspect of fighting corruption and organized crime. In particular, much emphasis was placed on the adoption of an effective legislative framework in line with international standards. Considerable progress had been made on these issues by 2004, however. At the time the project began, and even more so today, region on the whole stands ready to move forward, with legislative frameworks having undergone considerable change and improvement. The challenge lay in the implementation of the new rules, and in broadening anti-corruption measures beyond repressive, law enforcement instruments.

*It is a most timely and appropriate development, therefore, that PACO Impact, as have previous PACO projects, began to shift attention to comprehensive anti-corruption strategies and specialized bodies competent to address preventive and educational dimensions of the fight against corruption, in addition to repressive measures.*

The first two project Outputs (1. Anti-corruption plans improved or elaborated; and 2. Institutional mechanisms for the monitoring and management of anti-corruption plans strengthened) are thus very well defined. They reflect the prevailing attitude in the anti-corruption community that comprehensive strategies are required to effectively fight against corruption, and that specialized bodies are needed to effectively monitor the implementation of these strategies.

While some challenges to that position exist, it is the conviction of this evaluator that arguments in support of this position outweigh those against in the case of South-Eastern Europe today, if in nothing else than in their function to:

- create a comprehensive picture of the broad scope of actors and activities necessary to successfully combat corruption;
- communicate the importance of prevention and education efforts;
- assist in coordination of various reform activities; and
- manage expectations about the time and resources required to implement all the necessary tasks.

Arguing for the appropriateness of this approach throughout South-Eastern Europe in no way suggests that the content of the plans or structure of the institutions is universal. On the contrary, these guiding principles must be applied with utmost sensitivity to the needs of the differing national contexts. With regard to PACO Impact, the definition of project objectives is sufficiently broad to account for those differentiations.

Output 3, on the other hand, was initially defined more narrowly across project areas as “Draft laws/amendments available to bring the criminal legislation on corruption in line with European standards,” in line with Council of Europe’s “traditional” technical assistance competencies.

Considering the range of investments already made by the Council of Europe and other implementers in the region on the question of criminal code, the initial project document raised some concern, because, as noted earlier, more recent assessments point rather to challenges of *implementation* of existing codes. While some adjustments to the criminal code and criminal procedure codes are still necessary, it is the general consensus of stakeholders that the emphasis should lie in implementation of existing regulations, and that frequent changes to laws only further obstruct implementation. Fortunately, the inception period was used to conduct a closer situation and needs assessment, reflecting in differentiated approach in each of the project areas, defined as follows<sup>1</sup>:

Project area	(Re)definition of Output 3
Albania	Improved key legislation and its implementation in line with international and European commitments that Albania has adhered to
Bosnia and Herzegovina	Improved legislation and its implementation (especially related to investigation of corruption) in line with international and European commitments that BiH has adhered to
Croatia	Improved legislation and its implementation (especially related to investigation of corruption) in line with international and European commitments that Croatia has adhered to
Kosovo	Preparation of the legal framework for an independent Anti-corruption Agency in Kosovo in line with the relevant international and European standards
"the Former Yugoslav Republic of Macedonia"	Strengthened capacities [for] successful criminal proceedings against corruption while applying the newly introduced criminal law legislation
Montenegro	Strengthen the capacities to introduce and implement new legislation in line with international and European standards
Serbia	Improved key legislation and its implementation in line with international and European commitments that Serbia has adhered to

Similar refinements per project area as concerns Outputs 1 and 2 are also to be noted in the same section of the Workplan. Unfortunately, these adjustments were not reflected in periodic (bi-annual) Activity Progress Reports, and *it is advisable to do so in future projects in order to make clearer the link between project outputs and corresponding activities.*

Output 4 was defined loosely as "Pilot Activities" to support the previous three mutually-reinforcing objectives. The idea was to define the activities together with project area counterparts during the Inception Phase, recognizing of the need to tailor these activities to each project area needs. The resulting set of activities is rather diverse and will be addressed in more detail in Section 2 on implementation.

Viewed from a narrow project management perspective, Output 4 should have been defined more strategically from the outset, contributing to a greater coherence of the diverse project activities. From the point of view of impact, however, many of the *ad hoc* pilot activities have directly increased the capacity of law enforcement bodies to fight against corruption. The lesson to draw, therefore, concerns the benefits of flexibility in defining specific activities, particularly in projects of longer duration. However, such *flexibility should be accompanied by more extensive documentation of the rationale for specific activities to demonstrate that each has been selected strategically* and through deliberation with the stakeholders to ensure that the funds are spent in the most effective way possible.

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<sup>1</sup> PACO Impact Inception Report, PC-TC (2005)2, "Workplan: Inputs and logical framework for each project area," pp. 44-75.

Again, the emphasis on comprehensive AC strategies and their implementation was extremely well chosen. It demonstrates a shift in thinking beyond repressive means and legislative frameworks, acknowledging the need for a broader strategic approach. PACO Impact further strikes the balance of, on one hand, correctly recognizing that fighting corruption is an extremely complex area extending to all state and political institutions and the private sector, while, on the other hand, limiting its intervention to a few manageable areas where the Council of Europe has expertise and can effectively render assistance.

### **2.1.2 Responding to needs of each project area**

As noted above, while the idea of applying identical objectives may appear too rigid considering the different circumstances in the different project areas, in practice, the design was sufficiently flexible to address such concerns. Adjustments to the original project design were made during the inception period, and finalized in agreement with project area counterpart during the first regional “start-up” conference in Budva, Montenegro in July 2004.

While the scope of this assessment—with in-country interviews limited to four out of seven project areas—does not provide for an opportunity to draw conclusions comprehensively, the approach in project areas visited points to a very extensive consultations with national partners, and satisfaction of project area beneficiaries that the proposed activities match their priorities and needs. In many cases, national counterparts have taken the leading role in defining the same. Presentations and comments made at the PACO Impact Final Conference in July 2006 have supported this conclusion.

### **2.1.3 Regional Aspect**

Regional approaches have become somewhat of an unchallenged orthodoxy in development and reform work in South-Eastern Europe, but there is perhaps insufficient analysis of what modes of regional engagement are useful and under what conditions. PACO Impact project documents posits the benefits of a regional approach as:

- sharing experience and access to best practices;
- ensuring consistency with European standards throughout the region;
- creating peer pressure and supporting regional dynamics;
- cost effectiveness of project management.

Each of these propositions will be examined in detail in Section 3 (Outcomes/Impact), and in context of the challenges with implementation of this project on a regional level. At the outset, one of the main concerns of such an approach—insufficient consideration of specific project area needs—appears to have been addressed effectively.

### **2.1.4 Gender Issues**

One of the considerations in the project design phase has been the correlation between higher levels of women in politics and public administration and lower levels of corruption. PACO Impact was asked to take into account gender aspects in designing anti-corruption measures as well as carry out a gender analysis in the early phases of the project.

While gender issues certainly deserve attention in the region, it remains unclear how these aspects could be more effectively integrated at this stage of anti-corruption work or in this type of project. Increasing numbers of women in public life, including in politics and public administration are not

objectives that are achieved through anti-corruption strategies. Rather, these goals can be addressed through comprehensive institutional reforms (e.g. in Serbia since 2002, there has been a systematic effort recruit more women as uniformed police officers as part of a broad police reform initiative), and through long-term work with political parties.

No single project can address all reform needs in a society, and it is disputable whether PACO Impact should have more directly addressed gender issues. A majority (4 out of 7) of project area Country Project Directors were women, and women constituted a very high percentage of project participants overall, including in trainings organized under project activities. However, simply assessing the proportion the number of woman participants is not a meaningful indicator of “addressing gender issues.”

Gender equality is an important but complex and long-term objective, particularly in patriarchal societies of South-Eastern Europe, which requires a considerable long-term investment in institutional reforms noted above. *While it is certainly commendable that PACO Impact engaged such a high proportion of women in its activities, it is not this project where the correlation between gender and corruption could or should have been further explored.*

### **2.1.5 Choice of Instruments/Activities**

*Overall, the mix of instruments to achieve project objectives appears to have been well considered from the start. In future activities, it would be useful to elaborate more extensively the rationale for the choices made, however.* Previous implementation experiences ostensibly have provided a rich collection of lessons learned about effectiveness of previously used instruments. Absent a detailed explanation, this assessment relies on the evaluators’ own experience to ascertain the activities as generally well-chosen and appropriate for the stated project objectives. The actual lessons from the implementation of these instruments will be discussed in more detail in Section 2.

### **2.1.6 Project Inputs**

Staffing: The project design provided for one half-time Local Project Officer (LPO) per project area, and one Project Manager with one Project Assistant in Strasbourg. This is *exceedingly humble human resource input for implementing a project of this scope and complexity.* The Strasbourg-based Project Manager was in fact managing and coordinating seven different projects, given the differences in dynamics among the seven different project areas.

The project also stipulated for a Country Project Director appointed by the government in each of the project areas. Section 2 on implementation will provide a more detailed analysis of the sufficiency of these inputs in practice. *A preliminary analysis suggests that staffing inputs have been insufficiently considered during the project design phase, however.*

Funding: *While an overall budget of 1.5 million EUR appears to be considerable, in fact it is quite modest when one considers the scope of the project across seven project areas.* Even if the costs of regional meetings represented only 100,000 EUR of total project costs<sup>2</sup>, the remaining 1,400,000 EUR distributed among seven project areas represents a maximum of 200,000 EUR per project area for a two-year period. This is indeed a modest amount considering the extent of project activities and ambitious project objectives.

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<sup>2</sup> The initial project budget estimated this cost at just over 157,000 EUR; Inception Report revised budget at just over 190,000 EUR.

### **2.1.7 Timeline**

The timeline was likewise extremely ambitious in view of the need to account for dynamics of seven different project areas, the number of activities, and objectives that concern policy change of state institutions and legislative changes. *Commendable as it is to have ambitious goals, there must be recognition that these may not be realistically attainable, and there needs to be agreement on flexibility to extend/amend timeframes to account for reality of implementation.* Sufficient time must also be designated for assessment and preparatory work, so that in-depth needs analyses, and identification of partners, instruments, expertise, and other inputs can be effectively undertaken. Skimping on these preconditions only serves to the detriment of the quality of a project. Generally speaking—not referring to Council of Europe in particular—too many projects suffer in quality due to pressures to implement within a certain timeframe imposed by funding cycles. These constraints are experienced by donors as well as implementers, and are usually not within the control of the actors themselves. *Nevertheless, it is important to be cognizant of the challenge and endeavour to establish more flexible mechanisms to the extent possible. In this respect, the Sida decision to extend the project timeline beyond March 2006 has been extremely constructive.*

### **2.1.8 Risk Assessment**

Working directly with state institutions and government is the most effective way to address policy and legislative change, and the primary *modus operandi* of Council of Europe technical assistance efforts. It is also the most risky and challenging of partnerships when the project objectives are lengthy policy processes. Moreover, the project stipulated such partnerships in a region where the political situation is unstable, where state institutions are undergoing reforms, where there are numerous technical assistance interventions, and where the key reform activities are delegated to few overburdened staff members. Partnerships in this larger context will inevitably be difficult and challenging. *In the future, a more comprehensive assessment of these risks, including the absorptive capacity of partner institutions to manage and implement technical assistance, is recommended at the earliest stages of the project design process.*

### **2.1.9 Coordination with other implementers**

Coordination appears to have been done quite extensively with GRECO, SPAI, the European Commission, and of course, the Directorate General of Legal Affairs' parallel technical assistance effort (CARPO) at the level of analysis of previous and parallel efforts, and policy directions, though it is not described extensively in the project documents. *In the future, preliminary analyses should ideally include a history and status of other donors' and implementers' related activities in each project area, with explicit plans to cooperate to the extent possible during project implementation in order to maximize synergies and overall benefit to each project area.*

### **2.1.10 Evaluation**

As an industry standard, 8-10 percent of total project budget should be allocated for project evaluation. *In this case, the budget for evaluation is 1 percent, which is extremely modest.*

Evaluation should not only be external. While there is a benefit in an external and ostensibly more objective view, there is at the same time the challenge of distance from the project and reliance on second-hand information. The most important evaluation mechanisms are internal, carried out by the project team and immediate stakeholders, who have continuous first-hand knowledge of a project. To

conduct effective evaluations, provisions for specific measures corresponding to specific activities should be made during the project design phase. These may include, for example, brief surveys or focus-group discussions *for each activity undertaken*. Material resources, specific expertise, and above all *staff time* must be reserved to both administer evaluation tools and analyze the results.

While it is commendable that this project provided for external evaluation (many have no provisions whatsoever), *more investment in both material and human resources, above all from program staff, would be advisable in the future.*

## **2.2 Implementation**

Assessments of the implementation phase are primarily based on feedback from project participants and staff. It has been attempted to group relevant feedback in broader thematic categories. Each project activity will not be addressed separately, although specific project area activities of broader interest will be considered in more detail.

### **2.2.1 Human Resources**

While an analysis at the project design level suggested that human resources designated to the project may not be sufficient for the ambitious scope of project activities and timeline, project implementation fully confirmed this assessment. Council of Europe staff was stretched to the limit, both in Strasbourg and in project areas visited. They must be commended for their extraordinary efforts and commitment under challenging conditions.

Council of Europe administrative procedures are not negligible, particularly the requirements of financial management and travel-related procedures. *In the future, a more realistic prediction of time required for administration would be desirable, or perhaps a different division of technical /administrative activities might be considered, as staff's considerable technical capacity went unused due to the heavy administrative burden. With more time allocated for substantive matters, a greater number of activities may have been realized, including more external relations/visibility, outreach, and coordination on the local level. A number of staff interviewed expressed the desire to do more, but had not had the time.*

Country Project Directors (CPDs) in project areas visited were also overburdened with their regular professional responsibilities. Their role in the PACO Impact project represented an additional set of obligations, with no shift in existing responsibilities to other colleagues. Almost all Country Directors interviewed expressed surprise at the actual amount of work this project required.

There likewise appeared to be some disparity in the profile of the state officials assigned to the role of Country Directors, ranging from operative to more policy level positions, which influenced the level and quality of engagement. Both levels are needed: engagement at a certain political/hierarchic level serves that project-related requests receive attention; a more operative level ensures that concrete tasks actually are accomplished. *It is unlikely that a single position can satisfy both these requirements, and further conceptualization of the project area counterpart(s) roles is advisable in future efforts.*

A difficulty that directly resulted from limited capacities of Country Project Directors in certain project areas is imperfect communication and coordination with the wide range of state institutions participating in project activities. In many project areas, the gap was effectively filled by the Council of Europe Local Project Officers, with excellent results. But this was not the case everywhere. *The unequal effectiveness of these relationships points to a vulnerability of the arrangements under the PACO Impact project, and suggests that a different model should be considered in the future.*

### **2.2.2 Political Commitment**

It is not always possible to assess whether, and to what extent, challenges in implementation such as staffing commitments of state institutions are expressions of a low political commitment to the particular project or even to the issue of anti-corruption altogether. This evaluation was not in a position to make such an assessment. However, it is worth noting that technical assistance projects are particularly vulnerable to a lack of real political commitment, particularly when the commitment seeks to satisfy the form rather than the substance of technical cooperation. *A more comprehensive analysis of these risks, and provisions to manage them more effectively, is recommended for future efforts.*

### **2.2.3 Absorptive Capacity**

Limited capacity to engage technical assistance can be mistaken for a lack of political commitment, and care should be taken to distinguish between the two. During the implementation of PACO Impact, the shortage of staff noted in the section on Human Resources also manifested itself in (non) participation in pre-agreed project activities, such as workshops and trainings. Certain institutions—police and prosecutorial services in particular—participate in a number of different implementers' projects, and are at times simply unable to attend all the events scheduled.

Overall, it appears that state institutions still lack adequate mechanisms to easily absorb technical assistance. There are generally—with some exceptions—no provisions to allocate additional staff, or redistribute responsibilities, to meet the staffing demands of technical assistance partnerships. Responses from 4 of 7 project areas suggest that where projects were implemented well, it was due to the extraordinary commitment (working evenings and weekends, with no additional compensation) of officials assigned to the task. This is not a sustainable approach over the longer term. However, securing adequate staff commitments from state institutions is complicated by imperatives to reduce public administration budgets, including the numbers of state officials.

A related issue that has been raised in this context is the question of provision of a minimal per diem during project-related travels for personal expenses. Few state institutions have provisions such allowances, yet one inevitably incurs the cost of a coffee after the seminar with colleagues from neighbouring countries, which is precisely where regional cooperation is fostered. Donors and implementers are certainly correct to guard against potential abuses, or against the financial dimension becoming the most important reason for attending international seminars. However, compromise solutions that satisfy all sides' concerns should be sought.

While it is ultimately the responsibility of governments to develop the capacity to take advantage of the assistance offered, implementers and donors would be well served to take note of the constraints and communicate more clearly the project requirements and expectations. *More detailed cooperation agreements on the profile and scope of human resources needed to effectively implement particular projects should be negotiated at the outset, and provisions should be made on more reasonable working hours and/or compensation for staff involved. Donors and implementers should make a greater effort to take account of the demands of each other's interventions, working to arrive at a better coordinated and perhaps long-term set of assistance efforts.*

### **2.2.4 Local ownership**

In the implementation phase, local ownership of the project continued to be rated very positively. In four project areas visited, activities were designed in complete cooperation and agreement with state counterparts.

It may be of interest to note that the more advanced anti-corruption efforts in particular project area, the clearer the vision of the unmet needs, the more specific requests/insistence on particular activities. There is a question, however, whether the national counterparts' assessments are always entirely well-informed. *PACO Impact appears to have managed these negotiations effectively through a dialogue among national counterparts, project staff, and experts. It is a model worth emulating.* Again, project area counterparts were overall very satisfied that their requests were taken into account and needs have been met.



### **2.2.5 Project Management**

Administrative procedures have been consistently cited as the most difficult aspect of managing the PACO Impact project. Both donor and implementer institutions have complex and time consuming administrative procedures, particularly with regard to agreements on changes to original project documentation, financial management, and travel arrangements. These procedures have impacted on the originally proposed work plan and calendar of activities, as well as the staff capacity to more extensively engage on substantive matters.

To address this reality, *it is recommended that sufficient time and human resources be incorporated into future project design* to accommodate the administrative burden, and to allow for changes to original work plans that reflect the changing circumstances of project beneficiaries. As noted elsewhere, the PACO Impact project greatly benefited from modifications made both in the inception period and later during the project cycle. *This kind of responsiveness and flexibility should be encouraged in the future by simplifying or expediting the donor approval process.*

Co-management of project activities with the Country Project Directors also represented a challenge in certain project areas. In others, the cooperation was exemplary. Some suggestions about possible adjustments to cooperative agreements have been made in an earlier section on Human Resources. A discussion among the management team and Country Directors will likely yield better informed and more appropriate solutions.

The relationship between the Strasbourg-based Program Manager and Local Project Officers appears to have been highly effective. Much capacity has been built by LPOs in administrative, management, and technical competencies. *It would be highly desirable that this excellent local capacity be preserved by the Council of Europe through follow-up projects.*

An in-depth look at the financial management of project funds is outside of the scope of this assessment. Indications are strong, however, that this management is rigorously controlled by the Council of Europe finance department in Strasbourg, in a rather centralized manner.

### **2.2.6 Time Frame**

The majority of project beneficiaries confirmed that the time frame of the project was insufficient to reach the objectives set out in this ambitious project. Although it had been extended an additional four months (from March 2006 to July 2006), the timeline still did not allow for the completion of all the planned project activities, nor to witness the outcome of policy process initiated under this project. Policy processes, particularly those involving legislative and institutional changes require considerable time to finalize, and the final evaluation of project impact is not fully possible until these processes are complete. *In the future, it is strongly recommended to donors to permit extensions to project timelines, particularly when these require no additional funding. Revisiting the project outcomes six months after project completion is also advisable when attempting to assess the full impact of the effort.*

### **2.2.7 Scope of Activities**

Ambitious as the scope of the project has been, a number of project beneficiaries expressed an interest that the scope of activities be greater still, involving a greater number of state institutions. Fighting corruption is a complex task involving the active participation and coordination of nearly all public institutions. As projects begin to address complex and comprehensive anti-corruption strategies, the need to engage the many levels of state institutions becomes more keenly perceived. While no single

project can hope to address all anti-corruption needs in a society, *future projects should remember the need to promote cross-sectoral and inter-institutional cooperation to the extent possible.*

### **2.2.8 Expert Input**

Experts engaged on the PACO Impact project were rated very highly overall, although the assessment here—as elsewhere—is made on the basis of a limited sample, rather than systematically. Besides general praise, suggestions and differentiations were made along the following lines:

- National or regional experts particularly valued as they are generally seen to have a better understanding and thus more responsive to the challenges of countries in the region;
- For experts from outside the region, longer-term engagement was recommended to promote a closer understanding of the context and enable him/her to address the particular challenges of each project area;
- Longer-term engagement was generally viewed as desirable, and modes of securing it could vary: not only on-site visits, but e-mail contact also;
- Different kinds of expertise more appropriate at different stages of the reform processes: more conceptual at earlier stages of reform, more practitioners with more implementing experience at later, implementing stages.
- While critique is necessary, the exact formulation of recommendations for improvement should continue to seek to be maximally constructive and encouraging.

### **2.2.9 Activities**

The total implemented activities are too numerous to address individually, except in particularly noteworthy cases. Many valuable lessons can be and should be captured from implementation of specific activities. *Appropriate mechanisms to do so should be built in during the project design process, and adequate material and staff resources reserved to administer, analyze, and widely share these findings.* Below is a select sample of lessons compiled from responses in four project areas visited. Repeated recommendations have been consolidated into thematic sections:

Working group drafting sessions: For some project areas (e.g. Serbia) strategy writing through a collaborative process within a working group comprised of a wide range of state institutions, non-governmental institutions, and media was very demanding, and a departure from the established way of working. Demanding though it may have been, it is the opinion of this evaluator that the process was extremely valuable from several perspectives, ranging from introduction of new methodological approaches, to promotion of closer collaboration among the state institutions, to a sense of ownership of the resulting document. The presence of an international actor such as the Council of Europe, and international experts, was very valuable to the process in providing an objective arbitration on issues where working group members were in disagreement.

Concerns were raised about the appropriateness of a working group approach in matters of legislative drafting, however. Different from policy formulation, this is rather a technical process of transforming into legal instruments already agreed-upon policy objectives. In Serbia, however, it appears that the government initiated the legal drafting process prematurely, before reaching consensus on all policy questions, which resulted in delay and frustration. Needless to say, such oversights should be avoided.

Conferences, Workshops, and Seminars: Beyond general positive opinion about events organized under the PACO Impact project, the responses collected indicate increasing sophistication in differentiating which modes of engagement are most suited to reach particular objectives, whether it concern national or regional events. For example:

- Benefits of larger conferences with more presentations on many topics vs. more specialized gatherings addressing fewer topics in depth;

- Regional cooperation is perhaps better fostered by organizing joint (more than one country) study visits to observe best practices being implemented, rather than conferences and seminars based on presentations;
- Necessity for extensive preparation by host institutions, and dissemination of materials;
- Organizational aspects: plenaries, panels, working groups, discussion sessions—appropriateness of different modes of organization based on the event objectives.

Preferences appeared to correlate with operational vs. policy-oriented profiles of the interviewees. While this assessment is more of an impression than result of systematic analysis, it does suggest a need to examine more closely the appropriateness of particular organizational modes for particular topics and particular profiles of participants to meet the rising expectations of beneficiaries. *Closer evaluations of future events—both regional and national—according to some of these criteria is strongly recommended.*

Donors and implementers are further advised to consult closely with national counterparts in selecting topics and organizational modes. *National institutions should be regarded as full partners with increasing capacity to define needs and priorities that should serve as guidelines for delivering assistance.*

Educational/Training Events: A common assumption among donors and implementers is the notion that professionals who receive training will transmit their knowledge to colleagues who did not attend. This may happen on a limited *ad hoc* basis, but in general, it is not the case. Trainings for a select group of operatives will deliver increased knowledge and skills to those operatives, and that has a value. *If the objective, however, is to improve the knowledge and skills of a larger professional population, different strategies are needed: for example, integrating the content into permanent national training programs.*

Another concern was that trainings tend to be organized as one-off events, with few supporting materials that can serve as a permanent reference for implementers working on new issues and new technical approaches. It was viewed as highly desirable to supplement trainings or other peer exchanges with a compilation of materials presented, and to further integrate such efforts into more sustainable mechanisms, such as permanent national training programs. *Coordination with other implementers is likewise essential in ensuring more sustainability and coherence.*

Production of Training Manuals: The production of such a tool in Bosnia and Herzegovina is noteworthy in lessons relating to training and educational issues discussed above. It represents precisely the kind of permanent reference that will assist law enforcement officials in performing their duties and serve as a refresher of ideas and concepts that were introduced during a training seminar. At the same time, the concurrent CARPO project provided for the development of a training module to be introduced at the state training centre, and it was deemed most valuable to have such multiple interventions reinforcing each other. *Implementers and donors should strive to achieve similar synergies in the future to arrive at a more extensive and longer-term impact.*

Corruption surveys: PACO Impact supported such a survey in FYR Macedonia, carried out in cooperation between the State Commission for the Prevention of Corruption (SCPC) and the Institute for Sociological, Political, and Legal Research of the Saints Cyril and Methodius University in Skopje. The survey included both a perception component as well as a victimological assessment in an attempt to analyze the widely acknowledged gap between perceptions and experience of corruption. *Such surveys carried out by state agencies are a most welcome development, and in line with GRECO and other expert recommendations.* They are indispensable in correctly locating the opportunities and incentives for corruption, and targeting anti-corruption policies. A great deal of anti-corruption policies is based on *assumptions* about the *loci* of corruption and their causes<sup>3</sup>: *Effective policies, including preventive,*

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<sup>3</sup> For example, why is corruption not reported by citizens?

-Due to societal tolerance?

*educational, and public relations measures cannot be designed on the basis of assumptions. More such research of this type is needed, along with regional exchanges on methodological approaches and lessons learned.*

Public relations/outreach: A number of project areas activities involved public outreach with anti-corruption messages, usually concerning the promotion of the agencies and mechanisms or policies to fight against corruption. *This is a very important and highly recommended set of activities aimed to garner public support and participation in anti-corruption efforts.*

A common assumption in such work—beyond the PACO Impact project—is that such communication does not require special skills or expertise. This is a mistake. The private sector invests untold millions to effectively place its message—its product—in the marketplace. There is an art to formulating an effective message. Millions in donor assistance have already been spent in the region to support public awareness campaigns, yet little analysis has been done of which messages produce the desired effects, and which may actually bring about counterproductive results.

*It is strongly recommended that future efforts in this area include provision for expertise in communications strategies.* Police officers, or prosecutors, or anti-corruption policy experts should not be assumed to have expertise in public relations and communications. However, as this expertise accumulates with national anti-corruption bodies, *lessons on effective approaches should be captured and widely shared.*

Integrity Plans: While this evaluator was not in a position to closely examine the elaboration of Integrity Plans in two pilot law enforcement institutions in Serbia (Belgrade District Court and a Municipal Prosecutor's Office), the brief description of the process appears quite promising. The idea is to comprehensively analyze any institutional system to identify opportunities for corruption. *This is a most welcome preventive instrument added to the growing range of Council of Europe technical interventions that should be followed closely, analyzed for impact, and possibly replicated in other institutions in Serbia and throughout the region.*

#### **2.2.10 Coordination with other implementers/donors**

Effective coordination and information sharing is one of the principal challenges in all of our work, be it a state institution, international implementer, donor, or national NGO. As regards the implementation of PACO Impact project, the level of coordination has been uneven among project areas.

The most positive feedback has been received from SPAI, where there exists considerable satisfaction with coordination of the two regional initiatives. The situation is more complex at the local level. Where effective coordination was noted, it was often due to the proactive engagement of the Country Project Director who had an overview of other organizations' activities and had the capacity to manage and/or request additional assistance.

*Improved coordination or even joint implementation specific project activities can greatly enhance the quality of particular interventions leading to a better paced and more sustained reform process.* Taking into account the constraints imposed by limited time and capacity, project cycle, fiscal year, and other administrative restrictions, as well as a certain level of competition among implementers, *we must remember the benefits that can be realized through closer cooperation and continue to strive to advance it.*

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- Lack of knowledge about corruption?
  - Lack of faith in public institutions?
  - Due to scarcity of public services and lack of alternatives?

## 2.3 Outcomes/Impact

As noted earlier in the Project Design section, the decision to focus on anti-corruption plans and mechanisms to monitor and manage such plans is most commendable. There are few initiatives from implementing organizations, supported by adequate expertise, addressing this crucial question.

Thanks in part to PACO Impact, its predecessor projects, and the totality of other sectoral reform interventions, the region today stands in a very different place than it did only several years ago. Progress is evident. Law enforcement capacities are greatly improved, and the legislative frameworks governing law enforcement and other key anti-corruption processes are largely in place. All the countries in region have comprehensive anti-corruption strategies, and action plans to implement those strategies should be completed shortly. These are no small accomplishments.

While the question of attribution is always extremely difficult, the contribution of Council of Europe's previous and current efforts is evident if uneven across project areas, and unquantifiable. There appears to be a positive correlation between the level of investment and impact within the region, although much of it is also influenced by external factors, particularly the EU Stabilization and Association process.

*Overall, PACO Impact project appears to have effectively addressed project area needs both on the basis of feedback of local partners and as an independent assessment of this evaluator. Some project areas benefited more than others, as we shall see from a more in-depth look at select four countries, below.*

### 2.3.1 Bosnia and Herzegovina

While Bosnia and Herzegovina (B&H) has adopted a strategy to combat corruption and organized crime, the PACO Impact project appears to have played a less direct role in the process than in other project areas. Although the first set of project activities involved discussions among a number of stakeholders from different institutions that would need to take part in strategy drafting, this effort was not integrated with the state driven strategy drafting process at the policy level. Convergence happened with the participation of some of the same individuals in both processes, but it was not possible to assess the extent to which those individuals transferred the knowledge gained through the PACO Impact activities. What *can* be assessed with certainty is that the objectives of the PACO Impact project did not reach the relevant decision makers in state institutions, that a serious miscommunication occurred at the start of the state strategy drafting process, and that Council of Europe offers for assistance did not receive a positive response until near the end of that process.

Council of Europe experts did ultimately have an opportunity to comment on a draft of the strategy, and some of their suggestions were welcomed and integrated into the final version. The main points that were incorporated relate to the need to strengthen the emphasis on prevention and education efforts, and the inclusion of indicators of success. However, the document would have greatly benefited from additional exchanges with experts throughout the drafting process, as had been the case in other project areas.

While it is impossible, and inappropriate, for an external evaluator to fully assess the details of such an outcome, she can *recommend that the project team undertake an internal evaluation process to identify lessons for future interventions in Bosnia and Herzegovina and elsewhere.* Some questions to consider might include the following:

- What additional steps/efforts might be required in a state as complex as Bosnia and Herzegovina to assure that the decision-makers are better informed about the potential benefits of closer cooperation with a technical assistance project?
- To what extent might other, external actors be enlisted to help promote the resources offered by a technical assistance project (e.g. other international organizations operating in B&H, the Office of the High Representative)?
- In cases of apparent miscommunication within the responsible state bodies, could something be done to help alleviate the state organs' lack of internal coordination?

*Difficulties in coordination and the limited availability of the Country Director point to a general vulnerability of the project with regard to cooperation with state bodies, which has negatively impacted of the project in this particular project area. Fortunately, this has not been the case in other project areas.*

Other project activities have yielded much more positive outcomes. National training seminars on questions of prosecuting corruption and application of international standards on criminal liability provisions in national legislation have been evaluated as very useful. The drafting of a manual for law enforcement officials was likewise well received, and promises to have a longer-term usefulness than training sessions alone. *There appears to be significant synergy with activities undertaken under the Council of Europe CARPO project as well, but it is beyond the scope of this evaluation to assess the extent in any detail. However, it is recommended that such an analysis be made for all project areas.*

The potential for increasing the usefulness and impact of training/educational interventions is discussed in greater detail in the previous section on implementation (Section 2). *Future efforts would benefit from being viewed as part of a broader capacity building process within relevant institutions, beyond the specific objective of advancing the fight against corruption.*

### **2.3.2 Croatia**

It is a widely held opinion among the beneficiaries in Croatia that the PACO Impact project provided a momentum to complete the anti-corruption strategy drafting process. Other key contributing factors have been the GRECO recommendations along the same lines, and perhaps most importantly, the requirements of the EU Stabilization and Association process.

Impact directly attributable to the PACO Impact project includes providing for independent and objective expert opinions that helped to arbitrate issues that were under contention of different Working Group members. The Croatian parliament adopted the National Program on 31 March 2006. The development of sector-specific action plans is still underway, with good prospects of their being completed even as PACO Impact draws to an end.

In addition, PACO Impact appears to have succeeded in further emphasizing the importance of creating a monitoring body to oversee the implementation of the program. This matter is still under discussion, although there is confidence that this too will happen. The full impact of PACO Impact interventions and recommendation will be visible only in a few months' time when (if) these remaining follow up measures are implemented.

PACO Impact further contributed to the capacity of USKOK and the national police service to more effectively investigate corruption through provision of equipment. While concerns have been raised about the appropriateness of such material support through a project such as PACO Impact (as opposed to, for example, EU CARDS programme), the interventions were enormously valued by project beneficiaries, and deemed as absolutely essential in building up their capacity to operate effectively.

The project additionally provided for a limited number of outreach activities of USKOK, which has been mandated to carry out preventive and educational activities, and whose capacities in those areas are

beginning to consolidate. From this perspective, the intervention was seen as particularly valuable. A more general discussion on assistance in outreach matters, as well as training seminars, has been provided in Section 2 (implementation).

### **2.3.3 “the former Yugoslav Republic of Macedonia”**

In project areas such as FYR Macedonia where comprehensive plans exist, as do specialized bodies that work to continually improve such plans and monitor their implementation, it is difficult to distinguish which activities support the former and which the latter. The majority of activities designated under Outputs 1 and 2 in fact contribute to both.

A more detailed discussion of some of the activities that have a broader regional relevance, such as the survey conducted with the support of PACO Impact, is provided in Section 2, as is a more thorough analysis of the benefits of national training seminars. It may be noted briefly that a training session for court administrative personnel was particularly highly valued as it demonstrates broader thinking and responsiveness to needs that are typically neglected in technical assistance initiatives. Such departures from “doing business as usual” indicate not only the added value of the PACO Impact project approach, but also the improved capacity of national institutions to identify and communicate their needs. Such high levels of dialogue and cooperation are laudable indeed.

Other project activities were likewise strategically chosen. For example, supporting two Annual Evaluation Conferences to review and evaluate the national anti-corruption program and the work of the State Commission for the Prevention of Corruption (SCPC) has introduced a highly visible public process that serves to uphold the momentum of anti-corruption efforts. It is regrettable that the SCPC budget at the present time does not provide for the costs of such an annual event, and the fundraising capacities of the SCPC are limited. The sustainability of the initiative has thus not been secured.

The more clearly sustainable direct interventions of PACO Impact include assistance on defining and including success indicators in the anti-corruption action plan matrix, and elaboration of the national programme for fighting corruption to the local government level. Of course, as elsewhere, it is the challenge of implementation that remain ahead.

Lessons that are beginning to accumulate within the SCPC—including for example, those from designing an implementing a survey, the analysis of survey results and how this was used to shape SCPC programs and outreach activities—could of great interest to other regional counterparts. *It is recommended that such analyses be undertaken and presented in future regional exchanges.*

### **2.3.4 Serbia**

It was the unanimous opinion of all persons interviewed that the PACO Impact project critical in moving forward the strategy writing process in Serbia. Council of Europe’s role was two-fold: on one hand, providing the weight of the international community (particularly European institutions’) recommendations on a benchmark toward European integration; on the other hand, neutral arbitration based on expert opinion to help moderate some of the differences of opinion on policy choices. The strategy was adopted by the Serbian parliament on 8 December 2005.

The next steps—elaboration of detailed action plans, and the drafting of a new law on anti-corruption that, *inter alia*, includes provisions for the establishment of an independent anti-corruption agency—were not implemented during the project period, although some important input has been made under PACO Impact in the form of expert advice and arbitration of opposing positions (particularly on the latter).

Activities listed under output 3 have been wisely reformulated to support the objectives of outputs 1 and 2, which aimed to consolidate all anti-corruption measures under a single legal instrument and a dedicated agency. The departures from the original work plan are a strength rather than a weakness of the project.

The pilot activities implemented in Serbia, Integrity Plans in the Belgrade District Court and a Municipal Prosecutor's office deserve attention. They were selected by local stakeholders in a desire to learn a new and unfamiliar methodology. This is one of the few preventive activities implemented under PACO Impact that promises to deliver lessons of interest throughout the region.

The outstanding question for Serbia is how to maintain the momentum, and a high quality of outputs, beyond the timeline of the PACO Impact project. There remains an inadequate national institutional setup to assure that the process continues effectively. Action plans are being drafted through a CARDS twinning project with Slovenia; other international implementers, notably the OSCE, remain in place to help promote this process. However, there is a question of how successful these piecemeal efforts can be without the national capacity to move it forward. The national office charged with international cooperation on anti-corruption matters, membership in SPAI and GRECO included, is alarmingly understaffed. Absent a focused follow-up effort with very specific targets and necessary expertise/technical assistance, it is unclear that the momentum created can be sustained.

Beyond action plans for implementation of the anti-corruption strategy that have not yet materialized, there exists the challenge of actual implementation, which is a demanding long-term process. The prospect of an independent anti-corruption agency is a distant one, unlikely to begin functioning before the end of 2007 at best. In the interim, there are few uncoordinated state institutions dedicated to anti-corruption policies, including the Anti-Corruption Council (an advisory body to the government), the Public Procurement Agency, the Board for the Prevention of Conflict of Interest, and small specialized law enforcement teams. Serbia represents one of the project areas where additional investments representing a continuation of the PACO Impact project are urgently needed.

### **2.3.5 Regional Impact**

The PACO Impact project documents defined benefits of a regional approach as follows:

- sharing experience and access to best practices;
- ensuring consistency with European standards throughout the region;
- creating peer pressure and supporting regional dynamics;
- cost effectiveness of project management.

This evaluation cannot determine the success according to each of these criteria, but can offer the following some insights into benefits gained:

- *Every* project beneficiary interviewed on the topic saw a value in regional exchanges in principles; the differentiation was in modalities;
- Participants saw an important value in learning about neighbouring countries institutional setups and efforts to combat corruption;
- Without a closer examination of actual regional activities, it is impossible to determine to what extent best practices were actually exchanged, but the participants appear to have taken note of where to turn for information particular practices;
- Experience sharing was particularly valued by law enforcement institutions on practical, operational matters; even if other countries have a different institutional framework, the technical/operational principles of investigation, for example, are closely related;
- Contacts made during these and other regional activities are reported to assist in international cooperation on law enforcement matters, in particular;



- Elements of peer pressure, or rather, healthy competition, do appear to be a factor, although this has been noted at an operational level; determining whether this is also true at the policy level is beyond the scope of this assessment;
- Regional exchanges are viewed by a large number of beneficiaries as an important means of restoring trust and ties in a region that has experienced a decade of conflicts, and counteracting stereotypes about neighbours with whom there has been little previous exchange.

## **2.4 Lessons and Recommendations**

### **2.4.1 Lessons from Project design**

- (a) The emphasis on national anti-corruption strategies and action plans, and bodies charged with monitoring their implementation was extremely well chosen. Two of four project outputs directly addressed this overarching objective, while output 3 initially focused on criminal legislation. (Output 4 was left undefined as pilot activities that would be decided at a later stage) Output 3 was later modified to address other anti-corruption legislation, which was a welcome and vital modification that increased the project impact. The activities under output 4 were very diverse and in some cases very effective, although overall they appeared somewhat disjointed from other project activities.

*Flexibility in the project design in terms of definition of specific activities has worked to the advantage of PACO Impact, and should be encouraged. However, such flexibility should be accompanied by more extensive documentation of the rationale for specific activities to demonstrate that each has been selected strategically.*

- (b) All projects inputs—from human resources, to timeframe, to available funds—have been extraordinarily modest in relation to a project of this scope and ambition. *Human resource inputs should be reviewed to more realistically reflect the demands of administrative procedures*, in order to allow for greater technical/substantive inputs of project staff and more extensive evaluation of project activities. Modest increases in human resources could result in extensive benefits in the number and quality of project activities and impact, capture of lessons of implementation, as well as in reinforcing the profile of the Council of Europe as an implementing agency.
- (c) *Complex projects such as PACO Impact should attempt to negotiate additional flexibility with the donor from the outset, particularly with regard to extending timelines where no additional funding is required*, in order to maximize potential impact. This might be achieved in terms of setting minimum, intermediate, and maximum deliverables/outputs, as well as more timely approval procedure on the donor side.
- (d) *More specific agreements should be made with national/state counterparts about their role in a project*, particularly as regards the professional profile/level and time commitment of personnel required in the project. A more thorough understanding of the project needs, on one side, and capacities and constraints, on the other, can help ensure a more effective and sustainable form of cooperation.
- (e) *More resources, including staff time, should be dedicated to evaluation activities*, bearing in mind the common standard of 8-10% of project budget. These should not only include external evaluators, but internal evaluations as well, including the documentation and dissemination of lessons learned from the implementation of specific activities.

### **2.4.2 Lessons from Implementation**

- (f) Considerable knowledge about reform processes and the effectiveness about particular approaches and instruments has accumulated in the region over the past decade. Much of it is with the beneficiaries themselves, as well as with implementing organizations. More analysis and exchange on these lessons should be taking place both between donors and implementers, and among national agencies implementing anti-corruption policies. *Increased*

*efforts should be made, and resources committed, to collect, analyze, and share these lessons learned.* A number of them had been noted in the previous section on implementation (Section 2), but more systematic efforts, including internal evaluation mechanisms, need to be built in at the earliest stages of project design so that appropriate provisions are made to capture data needed for such analyses.

- (g) *Issues of prevention and education also deserve increased attention in the future.* Similar to concerns noted in the previous section with regard to public outreach strategies, there is much skill required to conduct effective educational efforts. Time has arrived to begin accessing such expertise in a more deliberate manner. Similarly, there is a rich collection of effective diagnostic and preventive practices applied around the world that have not yet been explored in the region. Increased attention should be placed on analysis and dissemination of these good practices, and their integration into anti-corruption as well as broader institutional reform policies.
- (h) Despite the overall increase in knowledge, *a great deal has yet to be understood about effectively fighting against corruption.* For example, an issue raised repeatedly is the role of the media in anti-corruption efforts. While it is widely accepted that the media, particularly investigative journalists, can be a powerful ally in the fight against corruption, sensationalistic and sometimes politically motivated reporting on corruption scandals can also play a detrimental role, increasing public cynicism and distrust in law enforcement and other state institutions. Similarly, the relationship of gender and corruption has not been sufficiently analyzed. Are women less corrupt, or are the societal conditions that encourage gender parity the same conditions that result in less tolerance of corruption? These and numerous other questions deserve more research and analysis in order to inform future anti-corruption programming.
- (i) As anti-corruption efforts shift toward implementation of comprehensive anti-corruption strategies, the number of institutions that need to be engaged on any particular project will increase. *Improved cross-sectoral and inter-institutional cooperation will be essential, and future projects will need to be designed in an increasingly complex manner to accommodate emerging needs.*
- (j) *Regional exchanges on above topics and other challenges in implementation will continue to be appropriate, if not essential.* Even as the countries of South-Eastern Europe increasingly look toward the European Union for models, it is the closest neighbours, facing similar challenges that will offer most effective insights as to how reforms can be implemented most effectively. Care needs to be taken, however, to organize such events appropriate to the profile and interests of the participants, as they will be one of the most important modes of delivering expanding regional expertise. Encouraging national counterparts to design such events should also be considered.
- (k) A message worth repeating is the *need for sensitivity to national contexts and national specificities.* While PACO Impact has scored well on this issue, future technical assistance must remain vigilant of the need to satisfy this imperative.
- (l) Cooperation with state institutions is a particular challenge, as already elaborated in some detail in earlier sections. While such partnerships are extremely valuable for maximum impact of technical assistance projects, *more needs to be done by state institutions, project implementers, and donors to understand the constraints of each partner and to find effective modes of cooperation.*

- (m) Coordination with other implementers, where it did take place, was very beneficial in promoting overall project objectives and achieving greater overall impact. *Increased efforts in this direction can only benefit future projects.* A particularly valuable lesson in this respect might be closer analysis of the synergies created with the CAPRO project, as well through cooperation with the OSCE in Serbia. *An analysis of synergies between CAPRO and PACO Impact, in particular, is highly recommended.*
  
- (n) *Coordination with European Commission delegations in individual project areas, as well as with Brussels, is likewise essential and should be enhanced to the extent possible.* The Council of Europe is *de facto* the EU's standard-setting, monitoring, and technical assistance instrument on anti-corruption matters. On the other hand, EU's political messages are essential in encouraging the political will to implement long-term anti-corruption policies, particularly those that reduce opportunities for political corruption or minimize immunities for politicians that engage in corrupt practices. Enhanced coordination of the Council of Europe's technical assistance with EU's political messages and funding would greatly advance the fight against corruption.
  
- (o) Continuity of engagement in South-Eastern Europe over a number years has yielded considerable added value to the Council of Europe as an implementing agency. Much of the impact made by PACO Impact is built on the foundations of previous PACO, Octopus, and other technical assistance projects. Council of Europe's advantage consists of in-depth understanding of the individual countries in the region and regional dynamics; a roster of diverse experts (many of them from the region) that can be engaged on projects; and long-standing in-country relationships with state institutions, non-governmental organizations, and other reformist forces. *Continued engagement in the region is most highly recommended.*

### **3 ANNEXES**

#### **3.1 Annex I**

##### **Terms of Reference**

##### **Assessment of the impact of PACO Impact: Implementation of Anti-corruption Plans in South-east Europe**

#### **1. Project Background**

PACO Impact is a regional project implemented by the Council of Europe with the objective to assist seven project areas in South-east Europe in the implementation of their anti-corruption plans and strategies. With a budget of € 1,500.000, the project is entirely funded by the Swedish International Development Cooperation Agency (Sida). PACO Impact started in March 2004 and will end in July 2006.

A project summary is attached as Appendix 1 of these Terms of Reference. All other relevant documentation describing the project, in particular its set-up and type of activities, and a list of all contacts as listed in these Terms of Reference will be made available to the consultant during the initial meeting with the Project Management Unit which will take place in Strasbourg, 23 May 2006.

#### **2. Objective of the assignment**

In accordance with the project document (February 2004), an evaluation of the project is foreseen to take place two months prior to the end of the project. This evaluation will be carried out through two parallel efforts. On the one hand, Sida as the donor has appointed an independent evaluator – the Institute for Public Management (IPM)--to carry out this task and has specified the issues that the evaluator should focus on. At the same time and complementary to the Sida evaluation, the Council of Europe would like to use this opportunity to assess the impact of PACO Impact and use its outcomes to draw lessons learnt for future technical assistance and cooperation

##### ***i) Overall objective***

The assignment will provide an assessment of the overall impact of the project against the project's objectives and its activities, as set out in the project document, and its value-added and impact from the country and regional points of view. The assessment will describe findings and conclude with strategic and operational-level recommendations (including the need for improvement) to the Council of Europe, which then shall be provided to the donor.

##### ***ii) Specific objectives***

The assessment should address the following questions:

##### ***a) Impact***

- How has the project achieved its intended objectives?
- How did the activities identified in the project design match local/project areas' needs and how have activities affected policy change?
- What can be said about the long-term impact and sustainability of the project activities/interventions?
- Summarize the results of the project activities, and their impact due to the project's assistance.

**b) External factors**

How have external factors influenced the achievement of the project's objectives and what can be extrapolated from this experience for future technical assistance and co-operation projects?

**c) Project design**

- What can be extrapolated in terms of lessons learned from the project design (i.e. how was the preliminary needs assessment conducted, what was the rationale for the selection of certain activities, which other inputs were used for the design stage etc.)
- How well has the project structure and its work plan (including its calendar of activities) worked to achieve the projects' objectives and meet the project area needs?

**d) The project's context with other donor efforts/ongoing programmes**

- How has the project managed to achieve synergies with other donors' assistance programmes?
- What has been the project's visibility and "placement" in the region as a technical cooperation intervention of the Council of Europe among other initiatives in the same field in SEE?
- What has been the relationship between the project and the European integration process in SEE (Stabilization and Association process and European Partnership, the monitoring mechanism of the Group of States against Corruption/GRECO, and Stability Pact Anti-corruption Initiative/SPAI).

**3. Scope and Methodology**

PACO Impact covers 7 project areas (5 countries of SEE). While the evaluation/assessment cannot conduct on-site visits to each of them, the desk review should embrace the totality of the project, geographically, and in terms of activities evaluated. Considering that IPM will be covering about 3-4 project areas, a specific *vertical* focus should be given to the project areas Albania, Bosnia and Herzegovina, "The former Yugoslav Republic of Macedonia", and Serbia. This selection is suggested in order to complement, on the one hand, the parallel effort by Sida, and, on the other hand, to compare findings for the project area that both evaluations will be looking at (Serbia).

In terms of *horizontal* issues, the evaluation should focus on project design and management aspects (see above under specific objectives).

In addition to the desk review, and "on-line" communication, the consultant will be expected to conduct the assignment through meetings/interviews/communication with the following groups:

- Project Management Team at the Council of Europe headquarters in Strasbourg, and Local Project Officers (stationed in each project area);
- Country Project Directors, who are the government assigned main interlocutors/liasons between the beneficiary institutions/government and the project management;
- Sida Country Office Representatives;
- Institute of Public Management (IPM)-Sida evaluators team;
- All main beneficiaries (counterpart institutions) involved in activities/interventions that have been carried out with and by PACO Impact;
- Representatives from the main international assistance providers/organizations/initiatives, such as the EC country delegations, UNDP, UNODC, OSCE, OHR, OECD, SPAI and any other appropriate organization;
- Short-term and long-term experts/consultants that have been involved and engaged in delivering activities, interventions, and providing legal and technical expertise.

In preparation of the in-country visits and its interviews, the consultant will acquaint herself with the project's documentation, and the following main reports which shall be provided by the Project Management Team as follows:

- Project Document (February 2004);
- Agreement of Sida and Council of Europe (February 2004);
- Current Financial Report [Budget Status] (April 2006);
- Inception Report (November 2004);
- Quality Group Report (September 2004)<sup>4</sup>;
- Activity Progress Report (May 2006);—this includes all previous semi-annual reports submitted to Sida<sup>5</sup>;
- Draft of Final Project Report (Version of May 2006); and
- Relevant GRECO reports covering project areas (before the project and current status evaluations);

In addition to these documents, the consultant will also have at her disposal information containing the Technical Papers<sup>6</sup> and any other relevant documentation related to projects chronology of interventions.

These documents can be found on the project's website at [www.coe.int/paco-impact](http://www.coe.int/paco-impact).

The PACO Impact Project Management Unit and the Local Project Officers are at the consultant's disposition throughout the assessment to assist with information and any questions she might have.

#### 4. Format of the report

The assignment will result in a report, which should not exceed 25-30 pages (not including any possible annex). The main findings and recommendations should be summarized on a maximum of 2 pages. The report should be assessment and recommendation-oriented, covering the topics described above by considering the project's outputs, inputs and its overall objective.

The report shall be addressed to the Directorate General of Legal Affairs, in two original copies signed and dated by the consultant. A copy of this report shall be submitted to Sida by Council of Europe.

#### 5. Working Time/Schedule/Days

The assignment will last from 20 May 2006 to 31 July 2006. An overall number of **27 working days** is foreseen for its completion. These should be broken down as follows:

- a) **6 working days** for desk review and initial briefing meeting with the project management in the Council of Europe headquarters in Strasbourg, to clarify general and specific questions regarding the project and its activities, necessary for an efficient conduction of the on-site visits (missions);
- b) **2,5 working days for each project area mission**, in 4 project areas (Croatia, Bosnia and Herzegovina, "The former Yugoslav Republic of Macedonia", Serbia), i.e. a total of 10 working days;
- c) **4 working days for writing of the first draft** report, to be submitted for feedback by 6 July 2006;
- d) **4 working days to prepare and participate in the Final Project Regional Meeting** in Strasbourg, which the consultant should use to present a summary on the assessment of the project and complement findings from the on-site visits with information from beneficiaries from the project areas

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<sup>4</sup> It has been agreed with Sida, that this report shall be used only as a reference information, and not substantial tool to serve the assessment of the project, rather than as a background information of previous efforts in evaluating the project's inception phase.

<sup>5</sup> These reports are also available to [www.coe.int/paco-impact](http://www.coe.int/paco-impact)

<sup>6</sup> Technical Papers (TPs) are Legal, Policy and Technical Advice documentation/products that have been provided and submitted to all relevant beneficiaries and counterparts as a result of activities carried out in project areas, or specific needs and actions that have merged as a result of project area needs in accordance to the required project's outputs.

not covered by the on-site visits (missions), as well as allow herself to address any additional query or question to the Project Management Team, Sida representatives, and IPM team;

- e) **3 working days for completing the report** after feedback from the project management team<sup>7</sup>. Deadline for the final submission of the report is 31 July 2006.

## 6. Travel (Missions)

The consultant - based in Belgrade (Serbia) - will travel in order to conduct the on-site visits (missions) in the following countries and in the following broad timeframe:

23 May 2006	Strasbourg (Initial briefing meeting with PMT, IPM)
7-8 June 2006	Croatia
14-15 June 2006	Bosnia and Herzegovina
21-22 June 2006	"The former Yugoslav Republic of Macedonia"
10-12 July 2006	Strasbourg (Final Conference and Debriefing with PMT, Sida, and IPM)

## 7. Other

The consultant will travel on missions under Council of Europe travelling and insurance rules and procedures, as referred to in the contract that she will sign with the Secretary General of the Council of Europe.

This Annex will constitute one of the parts of the contract between the Secretary General of the Council of Europe and the independent consultant.

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<sup>7</sup> This feedback includes, if necessary, correction of factual mistakes and/or the request for more detail on certain points in the draft report.



## 3.2 Annex II

### Documents Consulted

#### Project Documents:

Project Document (February 2004)  
Agreement of Sida and Council of Europe (February 2004)  
Current Financial Report [Budget Status] (April 2006)  
Inception Report (November 2004)  
Quality Group Report (September 2004)  
Activity Progress Report (May 2006)

#### Technical Papers:

<a href="#">TP-45 (2004)</a>	30 August 2004, PACO Impact: Analysis Report on Gender and Corruption in SEE countries, Kristina Hemon
<a href="#">TP-47 (2004)</a>	20 October 2004, Serbia (S&M): Prevention and Public Awareness Issues of the National Anti-corruption Strategy for Serbia, Bertrand de Speville
<a href="#">TP-49 (2004)</a>	20 December 2004, Serbia (S&M): The Law on Prevention of Conflict of Interests in Discharge of Public Office, Drago Kos + SIGMA opinion
<a href="#">PC-TC(2005)4</a>	Serbia (S&M): The Law on Financing of Political Parties of the Republic of Serbia, Drago Kos
<a href="#">PC-TC(2005)5</a>	23 February 2005, BiH: Policy advice for the Relevant Bodies, Kristina Hemon and Drago Kos
<a href="#">PC-TC(2005)6</a>	10 April 2005, BiH: Advisory Paper. Comments on the Anti-Corruption Strategy and Plan (MTDS) of BiH, Vera Devine
<a href="#">PC-TC(2005)8</a>	April-June 2005, Compendium of AC Services in SEE: Strengthening Anti-corruption services and efforts in South-East Europe, Project Management team and Vera Devine
<a href="#">PC-TC(2005)9</a>	June 2005, BiH: Initiation of revision of the anti-corruption strategy chapter and its action plan for BiH, Kristina Hemon
<a href="#">PC-TC(2005)10</a>	24 June 2005, "the Former Yugoslav Republic of Macedonia": Evaluation and recommendations on the implementation of the State Programme for the prevention and repression of corruption. National Conference, Ohrid, Bertrand de Speville
<a href="#">PC-TC(2005)15</a>	20 September 2005, PACO Impact: Summary of Expert Report on the Mid-term Review Meeting of PACO Impact (30 August 2005), Project Management Unit, Vera Devine and Bertrand de Speville
<a href="#">PC-TC(2005)16</a>	30 November 2005, Croatia: Expert Opinion and Comments on the Draft Program for Suppression of Corruption of the Republic of Croatia, Vera Devine and Goran Klemencic
<a href="#">PC-TC(2005) 17</a>	15 December 2005, PACO Impact: Summary of Group Discussions during the 3rd Thematic Seminar on Anti-corruption Services and Conflict-of-Interest Laws, Project Management Unit
<a href="#">PC-TC(2006) 5</a>	January 2006, Serbia: Guidelines for Drafting Anti-corruption Law and Draft of the Law on Anti-corruption in Serbia, Drago Kos
<a href="#">PC-TC(2006) 6</a>	March 2006, BiH: Expert Opinion on the BiH Draft National Action Plan/Strategy against Organised Crime and Corruption, Drago Kos (CARPO Project) and Vera Devine (PACO Impact)

[PC-TC\(2006\) 9](#)

May 2006, "the Former Yugoslav Republic of Macedonia": Expert Opinion on Political Finance System in "the former Yugoslav Republic of Macedonia", Marcin Walecki

[PC-TC\(2006\) 16](#)

Anti-corruption Strategies and Action Plans in South-eastern Europe: Current Status

**GRECO Reports:**

- Greco RC-I (2004) 4E, December 2004, First Evaluation Round: Compliance Report on Croatia  
Greco RC-I (2004) 15E, December 2004, First Evaluation Round: Compliance Report on "the former Yugoslav Republic of Macedonia"  
Greco RC-I (2005) 1E, May 2005, First Evaluation Round: Compliance Report on Bosnia and Herzegovina  
Greco Eval II Rep (2004)11E, October 2005, Second Evaluation Round: Evaluation Report on "the former Yugoslav Republic of Macedonia"  
Greco Eval II Rep (2005) 4E, December 2005, Second Evaluation Round: Evaluation Report on Croatia

**National Documents:**

- "Public Opinion on Corruption in the Republic of Macedonia," Institute for Sociological, Political, and Legal Research of Saints Cyril and Methodius University of Skopje (Skopje, April 2006).  
"Annual Report on the Work of the State Commission for Prevention of Corruption, 2005," Republic of Macedonia State Commission for Prevention of Corruption (Skopje, December 2005)

### **3.3 Annex III**

#### **Persons Interviewed**

##### **PACO Impact Project Staff:**

Ardita Abdiu, Project Manager, Strasbourg  
Darko Angelov, Local Project Officer, Skopje  
Vesna Effendic, Local Project Officer, Sarajevo  
Tamara Karaica, Local Project Officer, Zagreb  
Silvija Panovic-Djuric, Local Project Officer, Belgrade

##### **PACO Impact Experts:**

Vera Devine, Belgium  
Kristina Hemon, USA  
Drago Kos, Slovenia

##### **Bosnia and Herzegovina:**

Dragan Mumovic, Inspector, State Investigation and Protection Agency (SIPA)  
Velimir Rasevic, Inspector, State Investigation and Protection Agency (SIPA)  
Ljiljana Trisic, Assistant Minister, Bosnia and Herzegovina Ministry of Security  
Dragan Mektic, Deputy Minister, Bosnia and Herzegovina Ministry of Security  
Ramiz Huremagic, Head of Department of Operations, Prosecutor's Office of Bosnia and Herzegovina  
Sead Temim, Prosecutor, Prosecutor's Office of the Federation of Bosnia and Herzegovina  
Milan Tegeltija, Prosecutor, District Prosecutor's Office in Banja Luka  
Azemina Vukovic, Head of Office for Monitoring and Implementation of B&H Development Strategy (PRSP)  
Srdja Vranic, National PAR Coordinator, Bosnia and Herzegovina Council of Ministers  
Josko Mandic, Program Officer, ABA-CEELI  
Ljubinko Lekovic, Legal Adviser, Transparency International Bosnia and Herzegovina  
Vera Nazou, Task Manager, Delegation of the European Commission to Bosnia and Herzegovina  
Jeroen Willems, Task Manager, Delegation of the European Commission to Bosnia and Herzegovina  
Jelena Sesar, Political Advisor, Rule of Law Implementation Unit, Office of the High Representative to Bosnia and Herzegovina

##### **Croatia:**

Zorka Fumic, Deputy Head, Office for the Prevention of Corruption and Organized Crime (USKOK)  
Ivka Andric, Deputy Head, Office for the Prevention of Corruption and Organized Crime (USKOK)  
Natasa Djurovic, Deputy Head, Deputy Head, Office for the Prevention of Corruption and Organized Crime (USKOK)  
Ljubinka Sebetovsky, Representative for International Cooperation, Ministry of Justice  
Kresimir Sikavica, Chief Inspector, Ministry of Interior, Economic Crime and Corruption Department,  
Josip Kregar, Dean, Faculty of Law, University of Zagreb

##### **“the former Yugoslav Republic of Macedonia”:**

Vanja Mihajlova, Member, State Commission for the Prevention of Corruption  
Vladimir Georgiev, Head of Sector, Secretariat, State Commission for the Prevention of Corruption  
Sofka Pejovska-Dojcinovska, General Secretary, Secretariat, State Commission for the Prevention of Corruption  
Snezana Mojsova, Head of Division for European Integration and International Cooperation, Ministry of Justice  
Tanja Temelkoska-Milenkovic, Executive Director, Association of Judges of the Republic of Macedonia, Center for Continuing Education  
Jovan Ilievski, Prosecutor, Head of Unit for Combating Organized Crime and Corruption, Prosecution Service of Macedonia

**Serbia:**

Aleksandra Popovic, Assistant Minister, Ministry of Justice  
Sinisa Vazic, Judge, District Court of Belgrade  
Dragomir Trnivic, Head of Special Unit for Combating Corruption and Organized Crime, Prosecutor's Office  
Olgica Backovic, Deputy Chief Public Prosecutor, Public Prosecutor's Office  
Branislava Vuckovic, Prosecutor, Municipal Prosecutor's Office  
Gordana Stevanovic, Secretary General, Republic Committee for Resolving Conflict of Interest  
Predrag Jovanovic, Director, Public Procurement Office  
Nebojsa Nenadic, Program Director, Transparency International Serbia  
Miodrag Milosavljevic, Project Coordinator, Center for Free Elections and Democracy (CeSID)  
Zlatko Minic, Deputy Editor-in-Chief, BETA News Agency  
Svetlana Zorbic, OSCE  
Mirjana Cvetkovic, Delegation of the European Commission to Bosnia and Herzegovina  
Svetlana Bascarevic, Development Programme Section, Sida  
Olivera Puric, Team Leader, UNDP  
Darko Pavlovic, Programme Specialist, UNDP

**International Organizations:**

Veselin Sukovic, Executive Secretary, Stability Pact Anticorruption Initiative, Regional Secretariat Liaison Office