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Project against Economic Crime in Kosovo¹ (PECK)

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Final Narrative Report

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| Reporting period | 1 February 2012 – 30 June 2015 |
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¹ This designation is without prejudice to positions on status, and is in line with UNSCR 1244 and the ICJ Opinion on the Kosovo Declaration of Independence.

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Table of Contents

| | | |
|----------|---|-----------|
| 1 | DESCRIPTION | 4 |
| 1.1 | CONTACT PERSON | 4 |
| 1.2 | NAME OF PARTNERS IN THE ACTION | 4 |
| 1.3 | TITLE OF THE ACTION | 4 |
| 1.4 | CONTRACT NUMBER | 4 |
| 1.5 | START DATE AND END DATE OF THE REPORTING PERIOD | 4 |
| 1.6 | TARGET AREA | 4 |
| 1.7 | BENEFICIARY INSTITUTIONS | 4 |
| 1.8 | CONTRACTING AUTHORITY | 5 |
| 1.9 | IMPLEMENTING ORGANISATION | 5 |
| 2 | EXECUTIVE SUMMARY | 6 |
| 3 | DESCRIPTION OF ACTION | 8 |
| 3.1 | OVERALL OBJECTIVE | 8 |
| 3.2 | PROJECT PURPOSE | 8 |
| 3.3 | EXPECTED RESULTS (ERs) | 8 |
| 3.4 | WORKPLAN/OTHER MODIFICATIONS | 9 |
| 3.5 | DIFFICULTIES ENCOUNTERED DURING IMPLEMENTATION | 10 |
| 4 | ASSESSMENT OF PROJECT RESULTS AND ACHIEVEMENTS | 10 |
| 4.1 | ACHIEVEMENTS PER EXPECTED RESULTS (ER) | 10 |
| 4.2 | PROJECT PURPOSE: ASSESSMENT OF IMPLEMENTATION | 13 |
| 4.3 | ASSESSMENT OF PROJECT DELIVERABLES | 15 |
| 5 | COOPERATION WITH STAKEHOLDERS | 28 |
| 5.1 | COUNTERPART BENEFICIARIES | 28 |
| 5.2 | OTHER THIRD PARTIES | 28 |
| 6 | MONITORING AND EVALUATION | 29 |
| 7 | CONCLUSIONS AND RECOMMENDATIONS | 31 |
| 7.1 | CONCLUSIONS AND LESSONS LEARNED | 31 |
| 7.2 | RECOMMENDATIONS | 32 |
| 8 | LIST OF ANNEXES | 34 |
| 8.1 | ANNEX I: VISIBILITY ACTION | 35 |
| 8.2 | ANNEX II: REVISED WORKPLAN | 41 |
| 8.3 | ANNEX III: LIST OF PECK TECHNICAL PAPERS/DELIVERABLES | 44 |

1 DESCRIPTION

1.1 Contact person

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1.2 Name of Partners in the Action

Council of Europe and European Union

1.3 Title of the Action

Project against Economic Crime in Kosovo (PECK)

1.4 Contract number

IPA 2011 – CRIS No. 2011/282-152

1.5 Start Date and End Date of the Reporting Period

1 February 2012 – 30 June 2015

1.6 Target area

Kosovo

1.7 Beneficiary institutions

Main Beneficiary Institution[s]: Kosovo Anti-Corruption Agency (KAA), Financial Intelligence Unit (FIU), Office for Good Governance Human Rights, Equal Opportunities and Gender Issues (OGG) at the office of Prime Minister.

Project Beneficiaries include (but are not limited to) the following key agencies with a role in anti-corruption/anti-money laundering and combating the financing of terrorism in Kosovo:

- Special Prosecutor's Office of Kosovo (SPRK)
- National Coordinator for Combating Economic Crimes (NCCEC)
- Kosovo Judicial Council (KJC)
- Kosovo Prosecutorial Council (KPC)
- Kosovo Police (KP)
- Kosovo Police Inspectorate (KPI)
- Ministry of Justice (MoJ)
- Ministry of Internal Affairs (MIA)
- Ministry of Finance (MF)
- Ministry of Public Administration (MPA)
- Central Bank of Kosovo (CBK)
- Kosovo Intelligence Agency (KIA)
- Agency for Managing Seized and Confiscated Assets (AMSCA)
- Department for Registration and Liaison with NGOs (DRLNGO)

- Kosovo Customs (KC)
- Kosovo Tax Administration (KTA)
- Office of Auditor General (OAG)
- Procurement Review Body (PRB)
- Public Procurement Regulatory Commission (PPRC)
- Central Procurement Agency (CPA)
- Kosovo Assembly (KA)
- Central Electoral Commission (CEC)
- Kosovo Ombudsperson (KO)
- Kosovo Business Registration Agency (KBRA)

1.8 Contracting authority

European Union Office in Kosovo (EUO)

1.9 Implementing organisation

The Council of Europe was responsible for the implementation of the Project and the use of the Project funds under the European Union and the Council of Europe Agreement. Within the General Secretariat of the Council of Europe in Strasbourg, Directorate General of Human Rights and Rule of Law, and more specifically, the Action against Crime Department, Economic Crime and Cooperation Unit was responsible for the overall management and supervision of the Project with a Project team based in Pristina being responsible for day-to-day implementation of the Project.

The main objective of the Project was to contribute to democracy and rule of law through the prevention and control of corruption, money laundering and financing of terrorism in Kosovo.

Corruption, money laundering and financing of terrorism remain serious challenges for Kosovo. Efficient prevention and fight against these phenomena has been very high on the reform agenda of the Kosovo authorities in recent years, particularly in light of European integration process. Although series of reforms have been undertaken, no comprehensive, structured and longer-term process to assess their progress and impact has ever been made. The PECK Project was designed to address this gap by conducting a first comprehensive assessment of Kosovo's compliance with anti-corruption (AC), anti-money laundering and combatting the financing of terrorism (AML/CFT) international standards. The assessment was based on methodologies used by GRECO and FATF/MONEYAL and was specifically tailored to Kosovo. It was carried out in two cycles covering institutional, legal, policy and operational areas divided in separate themes.

The first assessment cycle (2012/2013) examined the effectiveness of the institutional and regulatory frameworks and their compliance with applicable international standards and identified shortcomings and risks. The second cycle (2013/2014) focused on ensuring sustained implementation by the authorities through follow-up action and on assessing a broader range of international standards, particularly in the AML/CFT field. A mid-term assessment was carried out with the aim to determine progress made in implementing the recommendations issued during the first cycle.

The main Project deliverables are comprehensive **assessment reports** in English, Albanian and Serbian which contain an in-depth analysis of Kosovo's AC and AML/CFT frameworks and specific recommendations for necessary legislative, institutional and policy reforms in the economic crime area. These reports serve as a **baseline** for local authorities and all other stakeholders working to improve the situation with economic crime in Kosovo, and form a solid basis for streamlining international technical assistance for Kosovo.

PECK assessment findings and recommendations have become a reference point for reports of numerous domestic institutions and international organisations (IMF, UNDP, etc.). The Kosovo Financial Intelligence Unit used the AML/CFT assessment report in support of its application for membership in **Egmont Group**. The Project also had **direct impact** albeit so far limited on several policy and legislative reform initiatives: amendments to the Law on financing of political entities, launching of the AML/CFT national risk assessment, and revision of the AML/CFT law. A number of legislative initiatives inspired by PECK recommendations have been finalised or are currently under parliamentary review (e.g. Justice reform package). At the Project Closing Conference, Kosovo authorities reiterated their firm commitment to implementing outstanding recommendations. Kosovo FIU has designed a specific action plan to address PECK assessment recommendations in the AML/CFT field. A more substantial impact will follow once the outstanding recommendations have been addressed, improving significantly compliance with relevant international standards.

Through the rigorous assessment process, complemented by various other interventions (workshops on assessment methodologies and best practices, including statistics, international conferences on fostering international cooperation in AC and AML/CFT fields, study visit, etc.), the Project covered more than 30 beneficiary institutions (including key ministries, central institutions and executive agencies, law enforcement bodies, the judiciary and financial sector) contributing to the developing and/or **enhancing of their institutional capacities** in AC and AML/CFT fields.

Overall, the Project implemented **43 activities/actions** over the period of 41 months and benefited from two no-cost extensions in order to consolidate achieved results, give the authorities more time to implement the assessment recommendations and to respond to their evolving needs. Total of **935 participants** took part in the Project activities, out of which **25%** were **women**. Over **50 contact points** from beneficiary institutions were trained to manage and follow up international assessment exercises.

The Project established very good cooperation with key beneficiary institutions, and in particular with the two main coordinating institutions - Kosovo Anti-Corruption Agency (KAA) and the Financial Intelligence Unit (FIU) – who actively participated and supported the Project activities. Ensuring local ownership has been a guiding principle for all Project interventions.

PECK Project achieved its expected results and successfully concluded its extended phase in June 2015. The value of the Project inputs has also been recognised through the recent evaluation of IPA support to fight against corruption, commissioned by the EU, which states that “PECK Project has been **instrumental** in assessing the Kosovo status regarding GRECO and FATF standards [...] and has delivered **very good quality outputs** and was highly regarded by the beneficiary”. Given its success and importance of continuing with structured and comprehensive assessment process for Kosovo, particularly in light of evolving international standards, a follow-up Project (PECK II) was designed and is pending signature. PECK II will build on the results and lessons learned from the current Project and in addition to the assessment exercise will assist the Kosovo authorities with the implementation of specific recommendations through targeted technical assistance.

3 DESCRIPTION OF ACTION

Project against Economic Crime in Kosovo (PECK) was funded by the European Union and the Council of Europe, and implemented by the Council of Europe. The initial Project duration was 30 months (1 February 2012 – 31 July 2014). The Project was extended twice without cost: the first extension (1 August 2014 – 31 March 2015) was approved in July 2014, and the second one (1 April – 30 June 2015) in March 2015. The overall Project budget was €1.2 million (EU contribution €1.0 million; CoE – € 200,000).

The Project derived from the need of Kosovo for a comprehensive and structured assessment process. While anti-corruption and anti-money laundering reforms had been under way for several years, there was no structured, longer-term process to assess their progress and impact. The PECK Project was designed to address this gap and to conduct first of its kind assessment of Kosovo's compliance with international AC and AML/CFT standards modelled after GRECO and MONEYVAL evaluations, specifically tailored to Kosovo. The aim was to allow Kosovo which is not part of the Council of Europe conventional framework and mechanisms to benefit from the CoE rule of law standards and to bring and share experience of monitoring procedures Council of Europe member states are subject to. The Project interventions were designed in such a way to actively involve Kosovo beneficiary institutions at all stages thus building and/or strengthening their capacities to support and carry out peer assessments based on methodologies of European bodies. It was also the first initiative for the Council of Europe to conduct simultaneously joint assessment of AC and AML/CFT frameworks covering all four evaluation rounds of GRECO and MONEYVAL which member states normally undertook in stages through a span of around 15 years.

3.1 Overall objective

To contribute to democracy and the rule of law through the prevention and control of corruption, money laundering and financing of terrorism in Kosovo.

3.2 Project purpose

To strengthen institutional capacities to counter corruption, money laundering and the financing of terrorism in Kosovo in accordance with European standards through thorough assessments and recommendations for improving and streamlining economic crime reforms.

3.3 Expected Results (ERs)

Expected Result 1: Assessment of anti-corruption measures:

- ER 1.1** Assessment and progress reports are available on the level of compliance of applicable regulations and practices with European standards (based on the experience and criteria used by GRECO and other relevant international bodies);
- ER 1.2** Kosovo institutions are capable to support and carry out peer assessments on anti-corruption measures based on European monitoring methodology;
- ER 1.3** Recommendations are available on regulatory, institutional, and policy-related areas;

ER 1.4 Assessment and progress reports (including compliance matrix) are published and disseminated in English, Albanian and Serbian.

Expected Result 2 – Assessment of anti-money laundering and combating financing of terrorism measures:

ER 2.1 Assessment and progress reports are available on the level of compliance of applicable regulations and practices with European standards (based on the experience and criteria used by MONEYVAL and other relevant international bodies);

ER 2.2 Kosovo institutions are capable to support and carry out peer assessments on anti-money laundering and countering financing of terrorism measures based on the European methodology of other international assessment mechanisms;

ER 2.3 Recommendations are available on regulatory, institutional, and policy-related areas;

ER 2.4 Assessment and progress reports (including compliance matrix) are published and disseminated in English, Albanian and Serbian.

3.4 Workplan/other modifications

The Project workplan was designed during the inception phase in close consultation with all involved beneficiaries. It was slightly revised several times to adapt to the evolving needs of beneficiary institutions and to avoid overlapping with other international organisations active in the economic crime area. Namely, initially planned study visit for the AML/CFT component (activity 1.15) was dropped to avoid duplication with another EU-funded project which envisaged two study visits for the FIU.

The workplan was revised for the no-cost extension of the Project (1 August 2014 - 31 March 2015) with the aim to conduct the 2nd assessment cycle in a more efficient manner and allow the Kosovo authorities more time to demonstrate progress, consolidate achieved results and fully benefit from the assessment process. Additional activity – support to the revision of the AML/CFT law - was added to the workplan with the agreement of the Project Steering Committee in April 2014. The objective was to assist and support the revision process of the AML/CFT Law based on the PECK assessment recommendations as well as best comparative practices and relevant standards.

The Project had to be extended without cost for the second time (1 April - 30 June 2015) in order to mitigate the delays caused by the 6-month political stalemate following the June 2014 general elections and to fully implement all the activities foreseen for the revision of the AML/CFT law. Other than the above-mentioned minor deviations from the workplan, the Project implemented all the planned activities.

In addition to the planned activities, in September 2012 the Project provided legal expertise of the amendments to the AML/CFT law at the request of the Minister of Finance of Kosovo and in agreement with the EU Office in Kosovo. This activity was outside the PECK workplan but contributed to and facilitated the PECK assessment of the AML/CFT framework.

3.5 Difficulties encountered during implementation

The Project encountered some difficulties during the implementation period. Namely, the first assessment cycle started later than originally foreseen due to negotiations between the CoE and EU (June-August 2012) on the denomination of Kosovo to be used in the footnote in Project-related documents. This resulted in shortening the period for the implementation of the assessment recommendations following the official adoption of the assessment reports (June 2013). This difficulty was addressed by 8-month no-cost extension of the Project which was possible due to sound and cost-efficient management of Project funds.

Some difficulties were encountered in collecting information and comments from relevant authorities on the Follow-up (progress) reports as well as to the replies to the 2nd cycle AML/CFT Questionnaire. The Project stepped up its efforts to actively involve and solicit input from all beneficiary institutions and used alternative ways of collecting information, complemented with continuous guidance and support provided by the Project team throughout the entire assessment process. As a result, the overall level of participation and commitment increased in the second assessment cycle.

Furthermore, the political stalemate following the June 2014 general elections concerning the establishment of new Kosovo institutions and government formation until December 2014, delayed the implementation of Activity 4 (support the drafting of the new AML/CFT Law). To mitigate this delay the project was extended without cost for additional 3 months until 30 June 2015, allowing it to fully implement Activity 4.

Despite the above-mentioned difficulties and thanks to timely remedial actions taken by the Project, all the planned activities have been implemented and expected results have been successfully achieved.

4 ASSESSMENT OF PROJECT RESULTS AND ACHIEVEMENTS

4.1 Achievements per Expected Results (ER)

Achievements per expected result are evaluated taking into consideration the implemented activities and objectively verifiable indicators (OVIs) as specified in the Project Logframe. Since the assessment process under the AC and AML/CFT components was conducted as a single unified process the results under the sub-items for ER 1 and ER 2 are the same.

In addition to OVIs the Project had set up a range of expected deliverables for each activity, which allowed to measure and verify the implementation and success rate of the activities themselves. Thus the analysis below contains two levels: review of OVI and Expected Deliverables. The Expected deliverables are reviewed within the “Actions/Challenges” column of the Activity Table below.

Expected Result 1

Assessment of anti-corruption measures

Expected Result 2

Assessment of anti-money laundering and combating financing of terrorism measures

OVI

- Compliance matrix established and approved by the Steering Committee;
- Terms of Reference on assessment prepared and approved by the Steering Committee;
- 1st assessment report, Progress report, and 2nd (final) assessment report available;
- Amount and quality of data and information produced by Kosovo institutions;
- Number/extent and professional diversity of people trained to manage and follow up international assessment exercises;
- Number of reports published, translated and number of institutions reached.

All the OVIs were fully achieved with the exception of OVI 4 (amount and quality of data and information produced by Kosovo institutions) as the quality of data/statistics and information provided by the beneficiary institutions varied throughout the assessment process. The Project encountered certain difficulties in obtaining comments and additional information from some institutions on the Follow-up reports, and meaningful data for the 2nd Cycle AML/CFT questionnaire and Final Assessment Reports. The Project addressed this shortcoming by stepping up its efforts through bilateral meetings and workshops to guide and further explain to the authorities what was expected from them, and using alternative ways of collecting information. As a result, and with the support of the FIU and KAA, the Project succeeded in engaging and soliciting more input from the beneficiary institutions towards the end of the assessment process.

1.1 / 2.1 Assessment and progress reports available on the level of compliance of applicable regulations and practices with European standards (based on the experience and criteria used by GRECO / MONEYVAL and other relevant international bodies);

Following the comprehensive and structured assessment process that consisted of two assessment cycles and mid-term progress review conducted on the basis of GRECO and MONEYVAL methodologies specifically tailored to Kosovo context, and in accordance with the Terms of Reference for the assessment approved by the Steering Committee, the Project produced total of 6 reports:

- Assessment reports (cycle 1) with in-depth analysis of Kosovo's AC and AML/CFT frameworks and their compliance with European and international standards, findings and recommendations for addressing identified shortcoming and gaps, adopted in June 2013;
- Follow-up (progress) reports assessing progress made by the Kosovo authorities in the implementation of the PECK recommendations issued in cycle 1, April 2014;
- Final (cycle 2) Assessment reports measuring and updating the level of compliance with international standards in the AC and AML/CFT adopted in December 2014.

The reports should be used by the authorities and all stakeholders working on improving economic crime situation in Kosovo as a baseline and roadmap for bringing necessary legislative, institutional and policy reforms. The FIU-Kosovo submitted the AML/CFT Assessment report to the Egmont Group in support of its membership. A number of

domestic institutions, as well as international organisations/projects and other sources referred to PECK assessment findings and recommendations in their reports.²

1.2 / 2.2 Kosovo institutions capable to support and carry out peer assessments on anti-corruption / anti-money laundering and combating the financing of terrorism measures based on European monitoring methodology;

The Project paid particular attention to local ownership. It worked with contact points specifically assigned to the Project within beneficiary institutions and in particular, representatives of two main coordinating institutions – KAA and FIU responsible for coordination, collection and dissemination of information among domestic institutions. The Project actively involved and solicited input of about 30 beneficiary institutions at all stages of the assessment process: completion of the assessment questionnaires, meetings with the Assessment Team during the on-site visits (105 representatives of 56 domestic and international institutions and civil society were met during the 2nd on-site visit), provision of comments and additional information on the assessment reports, discussion and adoption of the reports. The Project provided continuous advice and guidance to the beneficiary institutions through numerous bilateral and multilateral information sessions/workshops/meetings explaining the assessment process and methodology, collection of statistics, best practices and lessons learned. Over 50 contact points from beneficiary institutions were trained to manage and support international assessment exercises. The above-mentioned activities and interventions contributed to building and/or enhancing institutional capacities of beneficiary institutions to support and carry out peer assessments on AC and AML/CFT measures based on European monitoring methodology. In general, most of the beneficiaries demonstrated adequate capacities in this regard, although some of them were less active at various stages of the assessment (e.g. some of the institutions didn't provide any information/comments on the Follow-up reports or the quality of the provided information was not satisfactory).

1.3 / 2.3 Recommendations available on regulatory, institutional, and policy-related areas;

Based on the comprehensive and structured assessment modelled after GRECO and MONEYVAL evaluations, the Project issued concrete recommendations on the policy-related areas, regulatory and institutional framework in the AC and AML/CFT areas. For the AC

² Authorities' answers to the Questionnaire on the preparation of the Feasibility Study for Stabilisation and Association Agreement with the EU, p.74;

National Integrity System Assessment Kosovo, October 2015, Kosovo Democratic Institute/Transparency International Kosovo, pp. 11, 30, 32, 41, 43, 46-47, 55, 58, 69-71, 73-75, 84-86, 89, 95, 97-98, 101-103, 114, 118-119, 165-168, 178, 181-182, 194, 198, 235, 239, and 243-244: <http://www.kdi-kosova.org/>;

IMF Staff Report for the 2015 Article IV Consultation – Informational Annex, p. 47: <https://www.imf.org/>;

UNDP Project Outline on Support to Anti-corruption Efforts in Kosovo (SAEK), pp. 18-19: <http://www.undp.org/>;

Judicial Integrity in Kosovo, UNODC/UNDP, 2014, p. 20: <http://www.ks.undp.org/>;

Thematic evaluation on IPA support to the fight against corruption, Final Report of 5 August 2015 (Contract No 2014/348486/2), B&S Europe: <http://www.evropa.gov.rs/>;

Methodology on Monitoring and Evaluation of the Implementation of National Anti-corruption Strategies and Action Plans, Regional Anti-corruption Initiative for South Eastern Europe (RAI), 2015, p.21: <http://rai-see.org/>;

Strengthening Democratic Governance and Trust in Public Services in the Western Balkans, Mission Report, p.10: <http://www.respaweb.eu/>.

component, 62 recommendations were made aimed at addressing the shortcomings identified as regards the fundamental safeguards, preventive and repressive measures to efficiently fight and prevent corruption (all themes covered by GRECO four evaluations rounds) in line with international standards. In addition, a compliance matrix has been prepared to track the progress in the implementation of the recommendations. For the AML/CFT component, a detailed action plan was elaborated with the aim to improve and further strengthen the AML/CFT regime of Kosovo. In addition to providing concrete guidance on the needed reforms, PECK recommendations form a solid basis for streamlining international assistance to Kosovo in the economic crime area.

1.4 / 2.4 Assessment and progress reports (incl. compliance matrix) are published and disseminated in English, Albanian and Serbian.

All six reports produced by the PECK Project, including compliance matrix for the AC component, in English, Albanian and Serbian have been published and widely disseminated to all relevant domestic and international stakeholders. The reports were first published on the Project website (www.coe.int/peck) and to date they are also available on the websites of most beneficiary institutions (Government, Assembly, FIU, KAA, Central Election Commission, Kosovo Judicial Council, Supreme Court, Kosovo Judicial Institute, State Prosecutor's Office, Kosovo Police Inspectorate, Office of the Auditor General, Public Procurement Regulatory Commission and Procurement Review Body). In addition, the Project ensured the publication of the Final Assessment Reports in paper copy and widely disseminated them to all relevant stakeholders including international organisations, private sector, civil society and media at the High-level visibility event that was held in conjunction with the Project's Closing Conference on 28 April 2015.

4.2 Project Purpose: Assessment of implementation

OVIs

- Extent to which legislation, policies, organisations and capacities are in line with European standards;
- Number and seriousness/diversity of reported, investigated, prosecuted and adjudicated cases
- Number and extent of recommendations from risk analysis implemented
- Number/extent and professional diversity of people trained to manage and follow up international assessment exercised

Achievement of expected results contributed to attaining project purpose, i.e. strengthening institutional capacities to counter corruption, money laundering and the financing of terrorism in Kosovo in accordance with European standards through thorough assessments and recommendations for improving and streamlining economic crime reforms. The Project had direct impact on some legislative reforms: amendments to the Law on financing of political entities, launching of the AML/CFT national risk assessment, revision of the AML/CFT law addressed some of the assessment recommendations. Some legislative initiatives inspired by PECK recommendations have been finalised or are currently under

parliamentary review.³ By actively involving and soliciting input from contact points of over 30 beneficiary institutions (key ministries, central institutions and executive agencies, law enforcement bodies, the judiciary and financial sector) in all Project activities, the Project strengthened their capacities and trained them to manage and follow up international assessment exercises.

Despite the above-mentioned positive developments, the overall level of implementation of the PECK recommendations at the end of the Project was rather low. For AC component out of 62 recommendations 5 were implemented satisfactorily or dealt with in a satisfactory manner; 25 partly implemented and 32 recommendations (or 51.6%) not implemented. For AML/CFT component out of 40 + 9 FATF recommendations 2 are rated as Compliant (C), 8 as Largely Compliant (LC), 22 as Partially Compliant (PC) and 14 Non-Compliant (NC). 3 FATF Recommendations were considered Non-Applicable (NA) in the context of Kosovo.

More vigorous and sustainable efforts are needed to implement the pending recommendations. This would require strong political commitment in addition to co-ordinated, prioritised and effective measures that have to be taken without any further delay. Once implemented, the compliance with international AC and AML/CFT standards will be significantly increased and institutional capacities to prevent and fight corruption, money laundering and the financing of terrorism will be further enhanced. During the Project Closing Conference, the Kosovo authorities reiterated their firm commitment to implementing the outstanding recommendations. It remains to be seen if they will be able to undertake the needed reforms.

EC 2015 Report on Kosovo echoes Project findings and recommendations:

“Kosovo is at an early stage in the fight against corruption. Some progress has been achieved over the past year, notably in improved cooperation between the Anti-corruption Agency and the prosecution, and in requiring officials to declare property and gifts. However, overall progress has been limited and strong political will and commitment is needed to tackle this phenomenon properly. A comprehensive and strategic approach is necessary to ensure real results in fighting endemic corruption in Kosovo. A track record of successful prosecution and convictions would represent real progress. In addressing the shortcomings outlined below, the government of Kosovo should pay particular attention in the coming year to:

- *prioritising handling of high-level corruption cases, especially in public procurement, with a view to securing final convictions;*
- *strengthening the cooperation between police and prosecution through joint investigation teams on high-level corruption cases;*
- *concluding the development of an efficient system to monitor the track record of case handling from investigation to final court rulings;*

³ The justice package of laws including amendments and supplements of laws on courts, state prosecutor, Kosovo Judicial Council and Kosovo Prosecutorial Council that was adopted on 28 May 2015; Draft laws on amending and supplementing Law no.04/L-051 on Prevention of Conflicts of Interest in the Exercise of Public Office, on Management of Sequestered or Confiscated Assets, on amending and supplementing the Law no.04/L-042 on Public Procurement and on the Auditor General and the National Audit Office which are still under Parliament proceedings. All these legislative acts were partly triggered and/or partly addressed some of PECK assessment reports' recommendations.

- *revising the conflict of interest law and all related laws and regulations to bring in line with European standards. In particular, categories of public officials should be clearly defined and measures on preventing and sanctioning conflicts of interest and regulating "revolving doors" need to be adopted."*

[...]

*"Implementation of the 2014-2018 strategy and action plan for preventing and combating the informal economy, money laundering, terrorist financing and other financial crimes is on schedule... Implementation of applicable laws, secondary legislation and regulations on **money laundering and financial crime** is still insufficient, despite progress on putting appropriate systems in place. There is a policy of systematic serious **financial investigations**, but results are lacking. The rate of **confiscation and sequestration of criminal assets** remains low.*

The action plan for the national risk assessment on money laundering and combating financial terrorism was mostly implemented on time. With regard to the criminal offence of money laundering, Kosovo's legal framework is largely in compliance with the Vienna and Palermo Conventions. However, certain gaps, for instance on the declaration of assets by senior public officials and on market manipulation, remain.

Cooperation between the Financial Intelligence Unit in the Ministry of Finance and key bodies in the anti-money laundering chain needs to be further enhanced. Better co-operation and interaction with in particular police and prosecution is vital. The anti-corruption department within the Kosovo Special Prosecution Office should be strengthened to tackle more anti-money laundering cases, in cooperation with the EU Rule of Law Mission, EULEX. There has been an increase in the number of anti-money laundering cases forwarded to the prosecution. Nevertheless, there have been few convictions to date. Cooperation between the prosecution and police should be strengthened. Kosovo should make an effort to align its legislation and practices to the FATF recommendations."

4.3 Assessment of Project deliverables

| Activity | Expected Deliverables | Status | Actions/Challenges |
|--|---|-----------|--|
| Activity 1: Organise assessment (1st Cycle) on measures against corruption and AML/CFT | | | |
| 1.1 - Consulting and advice to institutions in Kosovo on reporting in the course of the assessment process | <ul style="list-style-type: none"> Over 50 contact points in beneficiary institutions trained on reporting for the assessment purposes | Completed | Actions The Project team provided continuous guidance and advice to beneficiary institutions through bilateral and multilateral meetings, explanatory/information sessions and workshops on the methodology and roll-out of the assessment process, including reporting of statistics. |

| Activity | Expected Deliverables | Status | Actions/Challenges |
|--|---|-----------|---|
| 1.2 - Prepare AC and AML/CFT questionnaires in line with the GRECO and MONEYVAL assessment methodologies | <ul style="list-style-type: none"> ▪ Assessment questionnaires for AC and AML/CFT components prepared based on GRECO and MONEYVAL methodologies | Completed | <p>Actions</p> <p>The Project prepared AC and AML/CFT assessment questionnaires based on GRECO and MONEYVAL methodologies. AC questionnaire covered all themes addressed by GRECO in four evaluation rounds; AML/CFT questionnaire dealt with 29 (out of 49) FATF recommendations, certain provisions of CoE Warsaw Convention and EU AML directive.</p> |
| 1.3 - Translation of the AC and AML/CFT Questionnaires into Albanian and Serbian | <ul style="list-style-type: none"> ▪ AC and AML/CFT questionnaires are available in Albanian and Serbian | Completed | <p>Actions</p> <p>The Project translated and proofread the AC and AML/CFT questionnaires in Albanian and Serbian</p> |
| 1.4 - Organise an explanatory seminar for authorities in Kosovo on data collection and preparation of responses to the assessment questionnaires | <ul style="list-style-type: none"> ▪ Explanatory meetings/seminars organised; ▪ Over 70 representatives of beneficiary institutions met ▪ Compilation of AC and AML/CFT international standards in English and Albanian disseminated | Completed | <p>Actions</p> <p>A series of explanatory meetings were held from 10-12 July 2012 to present and explain the substantive aspects of AC and AML/CFT questionnaires, and the roll-out of the assessment process.</p> <p>In July-September, Project Advisor held bilateral meetings with counterparts to discuss the contents of the assessment questionnaires, the process to organise and coordinate the gathering and systematization of responses by authorities, including the specific roles of the two lead agencies – the KAA and FIU;</p> <p>Additional actions</p> <p>The project compiled and disseminated AC and AML/CFT international standards to beneficiary institutions in English and Albanian</p> |

| Activity | Expected Deliverables | Status | Actions/Challenges |
|---|--|-----------|--|
| 1.5 - Dissemination of AC and AML/CFT questionnaires to each respective and relevant authority in Kosovo | <ul style="list-style-type: none"> ▪ AC and AML/CFT questionnaires in English, Albanian and Serbian disseminated to all beneficiary institutions | Completed | <p>Actions</p> <p>In September 2012 the assessment questionnaires were disseminated through KAA and FIU to all beneficiary institutions with a request to submit the responses within 2 months.</p> |
| 1.6 - Translation (as needed) of Kosovo response to assessment questionnaires | <ul style="list-style-type: none"> ▪ Authorities' responses to the assessment questionnaires translated into English | Completed | <p>Actions</p> <p>Authorities' responses to the assessment questionnaires were translated into English and forwarded to the Assessment Team for analysis and preparation of the on-site visit.</p> |
| 1.7 - Organise on-site visit(s) of experts team to Kosovo with the purpose of carrying out interviews and information gathering on the basis of the questionnaire responses | <ul style="list-style-type: none"> ▪ On-site visit conducted ▪ Representatives of over 50 domestic and international institutions met | Completed | <p>Actions</p> <p>On-site visit was conducted in two phases in the end of November – beginning of December 2012, and included meetings with a wide range of key institutions in Kosovo. The aim of the visit was to cross-check and clarify answers provided to the assessment questionnaires and gather additional information for drafting the assessment reports.</p> |
| Action 1.8 - Preparation of draft assessment report (including recommendations and compliance matrix) by experts' team and exchange of input with authorities in Kosovo with regard to findings | <ul style="list-style-type: none"> ▪ AC and AML/CFT assessment reports drafted and discussed with 25 representatives of main beneficiary institutions and 2 EULEX representatives | Completed | <p>Actions</p> <p>Based on the replies to the questionnaires and information gathered during the on-site visit and inputs from the authorities the Assessment Team drafted assessment reports with in-depth analysis of the AC and AML/CFT frameworks and recommendations to address the identified shortcomings. The draft reports were disseminated to the authorities for comments and discussed in detail during the Face-to-Face meeting held in Strasbourg on</p> |

| Activity | Expected Deliverables | Status | Actions/Challenges |
|--|---|-----------|--|
| | | | 29-30 April 2013. |
| Action 1.9 – Translation of draft assessment report | <ul style="list-style-type: none"> ▪ Draft AC and AML CFT reports translated into Albanian | Completed | <p>Actions</p> <p>The draft reports were translated into Albanian</p> |
| Action 1.10 - Finalisation and peer review of the draft assessment report at Plenary Conference | <ul style="list-style-type: none"> ▪ Plenary meeting held; ▪ AC and AML/CFT assessment reports (186 and 297 pages respectively) reviewed, finalised and adopted with the participation of representatives of over 30 beneficiary institutions | Completed | <p>Actions</p> <p>The assessment reports were further discussed, reviewed and adopted at the Plenary meeting held in Pristina on 10 June 2013 with the participation of all relevant stakeholders.</p> |
| Action 1.11 - Translation of assessment report as adopted at Plenary Conference | <ul style="list-style-type: none"> ▪ Assessment reports translated into Albanian and Serbian | Completed | <p>Actions</p> <p>The Project ensured translation and proofreading of the finalised assessment reports in Albanian and Serbian</p> |
| Action 1.12 – Publication of report by authorities in Kosovo. Visibility event for civil society with participation of media explaining the findings of the assessment | <ul style="list-style-type: none"> ▪ High-level visibility event organised; ▪ Over 50 representatives of domestic and international stakeholders, civil society and media took part in the conference; ▪ AC and AML/CFT assessment reports available on Project website in English, Albanian and Serbian, as well as on the websites of most beneficiary institutions. | Completed | <p>Actions</p> <p>The high-level visibility event (11 June 2013) presented the main findings and recommendations of the assessment reports to a wide range of domestic and international stakeholders, financial sector, civil society and media. The event was widely reported in local media.</p> <p>The Project published the assessment reports on its website at the end of November 2013 following the decision reached at the Project Steering Committee meeting.</p> <p>Challenges</p> <p>Obtaining official authorisation for publishing the assessment</p> |

| Activity | Expected Deliverables | Status | Actions/Challenges |
|---|--|------------------|--|
| | <ul style="list-style-type: none"> ▪ | | <p>reports proved to be difficult. Therefore, this issue was discussed at the 4th Project Steering Committee meeting (29 October 2013) and it was decided to publish the assessment reports on the Project's website, provided the beneficiaries didn't voice any objections within two weeks. Institutions were encouraged to make the reports available on their websites as well. It took some of them quite some time to do so.</p> |
| <p>Action 1.13 – Two workshops on best practices and lessons learned with regard to participation of Kosovo authorities in the assessment process, including issues of data collection, maintenance and reporting of statistics for assessment purposes</p> | <ul style="list-style-type: none"> ▪ Two workshops organised with participation of 25 and 40 persons respectively; ▪ Report on the 1st workshop available; ▪ Experts' presentations on UK and Dutch best practices available; ▪ Technical Paper on Interactive Statistics for Economic Crime in Kosovo prepared and disseminated to all relevant stakeholders in English and Albanian. | <p>Completed</p> | <p>Actions</p> <p>The 1st workshop (30 October 2013) allowed the Kosovo authorities to discuss the lessons learned from the 1st assessment cycle and to update the Project on the progress made in the implementation of the assessment recommendations. Report summarising the main findings of the workshop was shared with the Assessment Team.</p> <p>The workshop contributed to preparation of the draft progress reports, and enhancing capacities of the beneficiary institutions to manage and follow up international assessment exercises.</p> <p>The 2nd workshop (26-27 February 2014) focused on data collection, maintenance and reporting of statistics given that lack of reliable and comprehensive statistics was identified as one of the main shortcomings in the assessment process. As a result, Technical paper was prepared with practical guidance and</p> |

| Activity | Expected Deliverables | Status | Actions/Challenges |
|--|--|-----------|--|
| | | | recommendations for improving and further developing production of reliable, interactive and integrated statistics for tracking and tracing economic crime cases based on good practices in the UK and Netherlands. |
| Action 1.14 - Organise an interagency workshop for authorities in Kosovo to ensure a unified understanding of the proposed reforms | <ul style="list-style-type: none"> ▪ Workshop organised; ▪ 43 representatives of beneficiary institutions participated; ▪ 2nd assessment cycle launched. | Completed | <p>Actions</p> <p>The workshop (3-4 December 2013) presented and discussed the preliminary draft reports on progress made by the authorities in the implementation of the 1st cycle recommendations in order to ensure a unified understanding of the proposed reforms.</p> <p>Additional actions</p> <p>The workshop served to officially launch the 2nd assessment cycle and present the 2nd Cycle AML/CFT questionnaire and AC compliance matrix</p> |
| Action 1.15 – Study visit to promote bilateral cooperation in AC field | <ul style="list-style-type: none"> ▪ Study visit organised; ▪ 9 representatives of key institutions involved in fighting and preventing corruption took part; ▪ Cooperation with Italian counterparts enhanced. | Completed | <p>Actions</p> <p>The study visit to Italy (14-16 July 2014) allowed the Kosovo participants to exchange experience and knowledge with their Italian counterparts and to further strengthen bilateral cooperation.</p> |
| Action 1.16 - International conference on international | <ul style="list-style-type: none"> ▪ International conference organised; ▪ 50 participants | Completed | <p>Actions</p> <p>The conference (23 September 2014) allowed the participants to exchange practical experience,</p> |

| Activity | Expected Deliverables | Status | Actions/Challenges |
|--|--|-----------|---|
| cooperation between FIUs, prosecutors and law enforcement | from domestic and foreign FIUs, prosecution and law enforcement authorities took part in the event; <ul style="list-style-type: none"> ▪ Conference materials and conclusions available; ▪ International cooperation enhanced. | | good practices and peer advice on international cooperation and mutual legal assistance in fighting and preventing ML and TF. Representatives from Albania, Bulgaria, Croatia, Germany, Hungary, Italy, Montenegro and the United Kingdom shared their experience and presented practical case studies followed by fruitful discussions. Representatives of Kosovo Police and Ministry of Justice also presented their work. |
| Action 1.17 - Overall support to Kosovo authorities in implementation of recommendations from the assessment report | <ul style="list-style-type: none"> ▪ Continuous support and guidance provided to beneficiary institutions; ▪ Advisory Paper on draft amendments to the Law on Conflict of Interest provided. | Completed | <p>Actions</p> <p>The Project provided continuous support and guidance to beneficiary institutions in the implementation of the assessment recommendations through bilateral and multilateral meetings, workshops, etc.</p> <p>Additional action</p> <p>In December 2013, the Project prepared Advisory Paper on the draft amendments to the law on Conflict of Interest at the request of KAA as guidance to implement corresponding PECK recommendations.</p> |
| Activity 2. Preparation of progress report on the measures taken by Kosovo authorities to implement recommendations of the 1st assessment cycle | | | |
| Action 2.1 - Collection of information, including various EU reports (progress report, visa liberalisation roadmap, stabilisation and association agreement) necessary for the preparation of Progress | <ul style="list-style-type: none"> ▪ Information collected | Completed | <p>Actions</p> <p>The Project collected information for the preparation of the Follow-up (progress) reports from open sources and beneficiary institutions. Actions 1.12 and 1.14 (see above) contributed to this process.</p> |

| Activity | Expected Deliverables | Status | Actions/Challenges |
|--|--|-----------|---|
| report by Experts' team | | | |
| Action 2.2 – Drafting of progress report by Experts' team | <ul style="list-style-type: none"> ▪ AC and AML/CFT Follow-up (progress) reports drafted and discussed with beneficiary institutions | Completed | <p>Actions</p> <p>In November 2013, the Assessment Team drafted Follow-up (progress) reports assessing progress made in the implementation of the 1st cycle recommendations on the basis of information collected from open sources and limited input provided by the beneficiary institutions. The draft reports were discussed with the authorities during the interagency workshop (see action 1.14 above) and disseminated for comments and additional information to beneficiary institutions through KAA and FIU on 20 December 2013.</p> |
| Action 2.3 – Finalisation and translation of the Report, publication | <ul style="list-style-type: none"> ▪ AC and AML/CFT reports finalised and published in English, Albanian and Serbian, including AC compliance matrix on the Project website and websites of most beneficiary institutions; ▪ About 30 beneficiary institutions contributed to the preparation of the reports to various extents. | Completed | <p>Actions</p> <p>The reports were finalised and translated into Albanian and Serbian in April 2014. They were published in June 2014 after the general elections (8 June 2014) in order to avoid any potential inappropriate use or interpretation by media or political stakeholders.</p> <p>Challenges</p> <p>Due to limited amount and quality of data/information provided by the authorities on the draft Follow-up (progress) reports, the deadline for submission of comments and additional information had to be extended until 14 February 2014. The Project used every opportunity (bilateral meetings, workshops, etc.) to underline the importance of providing the</p> |

| Activity | Expected Deliverables | Status | Actions/Challenges |
|---|--|-----------|---|
| | | | requested information that would demonstrate the actual progress made. However, despite its best efforts, quite a few institutions did not provide any information or provided information that wasn't directly relevant. |
| Activity 3. Organise assessment (2nd CYCLE) on measures against corruption and AML/CFT | | | |
| Action 3.1 – Prepare 2 nd cycle AC and AML/CFT questionnaire/compliance matrix based on results and risks identified in the course of the 1 st assessment cycle | <ul style="list-style-type: none"> ▪ AML/CFT questionnaire prepared; ▪ AC compliance matrix available. | Completed | <p>Actions</p> <p>The Project prepared the 2nd cycle AML/CFT Questionnaire covering FATF recommendations not addressed in the 1st cycle. The AC Compliance Matrix was drawn up to track the progress made in the implementation of the assessment recommendations.</p> |
| Action 3.2 – Translation of the AC and AML/CFT questionnaire/compliance matrix into Albanian and Serbian | <ul style="list-style-type: none"> ▪ AML/CFT Questionnaire and AC Compliance Matrix available in Albanian and Serbian | Completed | <p>Actions</p> <p>The Project translated and proofread AML/CFT Questionnaire and AC Compliance Matrix in Albanian and Serbian.</p> |
| Action 3.3 – Dissemination of AC and AML/CFT questionnaire/compliance matrix to each respective and relevant authority in Kosovo | <ul style="list-style-type: none"> ▪ AC Compliance Matrix and AML/CFT Questionnaire disseminated | Completed | <p>Actions</p> <p>The 2nd cycle AML/CFT Questionnaire was presented and disseminated to project beneficiaries during interagency workshop on 3-4 December 2013 (see Action 1.14 above).</p> |
| Action 3.4 – Translation (as needed) of Kosovo response to assessment questionnaire/compliance matrix | <ul style="list-style-type: none"> ▪ Authorities' responses translated | Completed | <p>Actions</p> <p>The authorities' responses to the AML/CFT Questionnaire were translated into English as needed and forwarded to the Assessment Team for analysis and preparation of the 2nd on-site visit.</p> |
| Action 3.5 - Organise on-site visit(s) of | <ul style="list-style-type: none"> ▪ 2nd on-site visit organised | Completed | <p>Actions</p> <p>The 2nd on-site visit (14-18 April</p> |

| Activity | Expected Deliverables | Status | Actions/Challenges |
|---|--|-----------|--|
| experts team to Kosovo with the purpose of carrying out interviews and information gathering on the basis of the questionnaire responses | <ul style="list-style-type: none"> ▪ 105 persons from 56 domestic and international institutions met; ▪ Additional information/data collected. | | <p>2014) served to verify and cross-examine replies provided to the AML/CFT Questionnaire and to collect additional and updated information on the implementation of the 1st cycle recommendations for both AC and AML/CFT components.</p> <p>Challenges Limited information/data provided by the institutions on the AML/ CFT Questionnaire; lack of meaningful statistics.</p> |
| Action 3.6 - Preparation of draft assessment report (including recommendations and compliance matrix) by experts' team and exchange of input with authorities in Kosovo with regard to findings | <ul style="list-style-type: none"> ▪ Assessment reports drafted and disseminated to beneficiaries for comments | Completed | <p>Actions In June 2014, the Assessment Team drafted Final Assessment Reports based on the replies to the questionnaire and information gathered during the on-site visit. The draft reports were disseminated to beneficiary institutions for comments through KAA and FIU at the beginning of September 2014. KAA and FIU coordinated the gathering of comments/inputs from beneficiary institutions and submitted consolidated replies in October-November 2014.</p> |
| Action 3.7 – Translation of draft assessment report | <ul style="list-style-type: none"> ▪ Draft assessment reports translated | Completed | <p>Actions In August 2014, the draft Final Assessment Reports were translated into Albanian in order to be submitted to beneficiary institutions for comments</p> |
| Action 3.8 - Finalisation and peer review of the draft assessment report at Plenary Conference | <ul style="list-style-type: none"> ▪ Final Assessment Reports finalised, reviewed and adopted at the Plenary meeting; ▪ 67 representatives of | Completed | <p>Actions The Final Assessment Reports were finalised in light of the comments received from the authorities and further discussed, reviewed and adopted at the Plenary Meeting (2-3 December 2014) with active</p> |

| Activity | Expected Deliverables | Status | Actions/Challenges |
|--|--|-----------|---|
| | domestic and international organisations participated in the Plenary meeting. | | involvement of relevant domestic and international stakeholders. |
| Action 3.9 - Translation of assessment report as adopted at Plenary Conference | <ul style="list-style-type: none"> ▪ Final Assessment Reports translated into Albanian and Serbian | Completed | <p>Actions</p> <p>Final Assessment Reports as adopted at the Plenary were translated and proofread in Albanian and Serbian</p> |
| Action 3.10 - Publication of report by authorities in Kosovo. Visibility event for civil society with participation of media explaining the findings of the assessment | <ul style="list-style-type: none"> ▪ AC and AML/CFT Final Assessment Reports (196 and 408 pages respectively) published and widely disseminated; ▪ High-level visibility event organised; ▪ Findings of the Final Assessment Reports presented; ▪ 66 participants from domestic and international institutions, civil society and media. | Completed | <p>Actions</p> <p>The Final Assessment Reports in English, Albanian and Serbian were published (paper copy and online publication) and widely disseminated at the High-level visibility event held in conjunction with the Project's Closing Conference on 28 April 2015. The main findings and recommendations, as well as lessons learned from the assessment exercise were presented to a wide range of domestic and international stakeholders, including civil society and media. The Final Assessment Reports in three languages are available on Project's website and websites of most beneficiary institutions.</p> |
| Action 3.11 - International conference on international cooperation in the area of anti-corruption | <ul style="list-style-type: none"> ▪ Conference organised; ▪ 50 participants from domestic and foreign AC bodies, prosecution and law enforcement authorities; ▪ Conference materials available and disseminated to all participants; ▪ Existing | Completed | <p>Actions</p> <p>The international conference (28 October 2014) allowed participants to exchange experience, good practice and peer advice on cooperation in the AC field focusing on various specific AC measures aimed at effectively fighting and preventing corruption. Representatives of AC bodies, prosecution and law enforcement authorities from</p> |

| Activity | Expected Deliverables | Status | Actions/Challenges |
|--|--|-----------|--|
| | cooperation enhanced and new contacts established. | | Kosovo, Albania, Austria, Croatia, Latvia, Lithuania, Slovenia and “the former Yugoslav Republic of Macedonia made presentations illustrated with practical case studies followed by discussions. |
| Action 3.12 - Final conference on best practices and lessons learned from the assessment process | <ul style="list-style-type: none"> ▪ Final conference organised | Completed | Actions See Action 3.10 above |
| Activity 4. Support preparation of the new AML/CFT law | | | |
| Action 4.1 - Setting up and meetings of the Working Group composed of international and national experts | <ul style="list-style-type: none"> ▪ Comments on draft Concept Paper for the revision of the AM/CFT law available; ▪ Working Group set up; ▪ 3 workshops organised; ▪ Workshop report available. | Completed | Actions This activity was added to the Project workplan for the extension period in consultation with the beneficiary institutions and the EUD. The Project provided detailed comments on the draft concept paper for the revision process of the AML/CFT law, including setting up of the Working Group. The Working Group was finally set up in February 2015. The Project organised three workshops (11-12 December 2014, 25-27 March 2015 and 22 June 2015) with the aim to guide and assist the Working Group with the drafting of amendments to the AML/CFT law compliant with applicable international standards. Challenges 6-month political stalemate following June 2014 general elections delayed the official setting up of the Working Group. This coupled with fragmented coordination and cooperation |

| Activity | Expected Deliverables | Status | Actions/Challenges |
|--|--|-----------|---|
| | | | with relevant stakeholders put at risk the full implementation of this activity. To mitigate this risk, the Project had to be extended without cost for additional 3-month. |
| Action 4.2 - Drafting of the new AML/CFT law in coordination and consultation with all relevant stakeholders | <ul style="list-style-type: none"> ▪ Legal opinion on draft amendments to AML/CFT law prepared and discussed with the Working Group | Completed | <p>Actions</p> <p>The legal opinion on the proposed draft amendments to the AML/CFT law was prepared and discussed with the Working Group. The opinion analyses the compliance of the draft amendments with applicable international standards and recommendations for addressing identified shortcomings. It is supplemented with a revised version of the draft amendments and explanatory comments where appropriate. The opinion was discussed with the Working Group during the June 2015 workshop and further amended in light of these discussions. It was then translated into Albanian and submitted to the FIU for taking it into consideration in the further drafting process.</p> <p>Challenges</p> <p>Fragmented cooperation and coordination; delayed and incomplete submission of amendments to the AML/CFT law (May 2015).</p> |

5 COOPERATION WITH STAKEHOLDERS

5.1 Counterpart beneficiaries

On the whole, the PECK Project had very good cooperation with its stakeholders. The two coordinating institutions for the AC and AML/CFT assessment components – the KAA and the FIU – demonstrated a proactive role in the assessment process, particularly in the highly resource-intensive phase that included the dissemination of the assessment questionnaires and draft reports in different stages of their elaboration, collection of replies to the questionnaires and requests for additional information, and other deliverables from a wide range of authorities in Kosovo.

Majority of authorities in Kosovo made efforts to actively participate in the assessment process and to provide the Project with necessary information. That said, the level of engagement of some authorities differed throughout the various stages of the assessment. For example, despite an extended deadline for the submission of comments/additional information to the AC and AML/CFT Follow-up reports, the 2nd cycle AML/CFT Questionnaire and the draft AC and AML/CFT 2nd cycle Assessment reports, only a limited number of institutions provided feedback or useful input. This was particularly the case for the AML/CFT 2nd Cycle Questionnaire with a number of questions not being answered or partially answered (the Project would receive information on the laws, but not necessarily on their implementation). Another example pertains to participation in meetings and events organised by the Project, where some institutions had a lower level of presence than others, notably the Ministry of Finance, the Ministry of Internal Affairs and the Ministry of Public Administration. This however changed towards the end of the assessment process and the institutions more readily contributed to discussions and adoption of the Final Assessment reports.

5.2 Other third parties

The Project efficiently cooperated with EULEX that provided valuable inputs to the preparation of the assessment reports. EULEX representatives actively participated in all Project activities organised during the reporting period.

Regular coordination meetings were also held with the EU funded Projects on “Support to Kosovo Institutions for Combating Financial and Economic Crimes”, “Support to the Agency for Managing of Seized and Confiscated Assets”, as well as with the Twinning projects “Strengthening Criminal Investigation Capacities against Organised Crime and Corruption” and “Improving the Approximation of Laws and Coherence of the legal Framework”, in order to exchange information and avoid overlapping. The Project also held consultations with UNDP funded project “Support to Anti-Corruption Efforts in Kosovo” (SAEK).

Representatives of UNMIK, UNDP, IMF and World Bank were also regularly invited to participate and contribute to the Project activities, with various levels of participation.

6 MONITORING AND EVALUATION

The Project was assessed twice by the EU Result Oriented Monitoring (ROM) in October 2013 and June 2014 with the aim to provide external, objective and impartial feedback on the performance of the Project.

As foreseen by its methodology, ROM assessed the PECK Project for relevance and quality of design, efficiency of implementation to date, impact prospects and potential sustainability, and effectiveness to date. The first ROM report was very positive and the Project was marked with quintuple A's for all assessed areas (marking is done on a scale from A to D with A being the highest mark and D the lowest). The grades slightly decreased in the second ROM report, and the Project received four B's and one C for effectiveness to date. The overall impression was that the Project slowed down the pace of its activities and was perceived to be less enthusiastic when it comes to the implementation. This could however be attributed to the lack of proper understanding of the specific nature and the actual scope of activities that were being undertaken. In addition, this contrasts with the implementation of the 2nd assessment cycle including a more active involvement of beneficiary institutions. The Project Team provided detailed comments on the ROM report.

That said, the ROM key observations were that:

"[t]he project is producing outputs of good quality and they are contributing toward achievement of the planned results. The result focusing on peer assessment to be performed by Kosovo institutions is however facing a time constraint (not enough time remaining to derive the full benefit from the assessment cycles implementation at the local level and to adequately follow-up the recommendations from the assessment reports). Without a project extension, this is likely to restrict the project impact."

The recommendation regarding the improvement of the reporting was taken on board and applied in the Project reports, including the present one.

PECK Project was evaluated under the [EU Thematic evaluation on IPA support to the fight against corruption](#). The PECK performance and outputs were assessed as very good. Below are some key findings of the evaluation:

"PECK/CoE project has been instrumental in assessing the Kosovo status regarding GRECO and FATF standards in the fight against corruption and addressing them. Some improvements are evident in the legal framework for anti-money laundering, political parties financing and declaration of assets, which are attributed to EU projects.

[...]

PECK has included civil society representatives in the consultation phase of the drafting and presenting of assessment reports, and the private sector was also included during the assessment in relation to the relevant legal and procedural anti-corruption and anti-money laundering framework. Delivery of all planned outputs has been according to schedule [...]. Beneficiaries are satisfied that the qualities of implementation and outputs are very good.

[...]

The PECK project, implemented through Direct Agreement with the CoE, delivered very good quality outputs and was highly regarded by the beneficiary. The project assessed the compliance of Kosovo's measures on anti-corruption (AC), anti-money laundering and combating the financing of terrorism (AML/CFT) with 2012 FATF Standards and provided valuable recommendations to the Kosovo authorities aiming to achieve legislative and organisational reforms compliant with international standards. The Assessment Reports also provided a solid basis for streamlining international technical assistance to Kosovo in the area of economic crime.

[...]

Even though of an assessment nature, the transfer of knowledge was included within the PECK assessment process, which in both cycles was coordinated by Kosovo institutions such as the Anticorruption Agency and the Financial Intelligence Unit. This enabled the relevant institutions to be exposed to GRECO and MONEYVAL assessment methodology and use it practically. This was more evident during the second cycle when more active and intensive engagement by the Kosovo institutions was noted".

7.1 Conclusions and lessons learned

It can be overall concluded that the PECK Project achieved its intended objective and expected results thereby contributing to prevention and control of corruption, money laundering and financing of terrorism in Kosovo. The Project conducted the first comprehensive and structured assessments of Kosovo's AC and AML/CFT regimes vis-à-vis applicable international standards, based on methodologies of well-established monitoring mechanisms of the Council of Europe - GRECO and MONEYVAL, and implemented a number of tailored capacity-building activities aiming to support specific needs of beneficiary institutions.

PECK comprehensive assessment reports provide in-depth analysis of Kosovo's AC and AML/CFT frameworks, needs for action and recommendations for addressing identified shortcomings and improving compliance with applicable international standards. PECK findings and recommendations inspired a number of legislative initiatives and had direct impact albeit so far limited on some legislative reforms. They have the potential to maintain significant impact on the development of Kosovo's policies, organisational reforms, legislation and operational practices in the AC and AML/CFT areas beyond the lifetime of the Project. PECK assessment reports should moreover serve in the future as a baseline for authorities and all other relevant stakeholders in efforts to effectively fight and prevent economic crime.

The Project activities contributed to building and enhancing capacities of more than 30 Kosovo institutions with knowledge and expertise to support and carry out future peer-review assessments based on international monitoring methodologies and practices.

Overall the main success factor instrumental in the delivery of the Project activities has been the efficient cooperation between the project team and Kosovo authorities, particularly the main beneficiaries – the Kosovo Anti-corruption Agency and the Financial Intelligence Unit to which a significant burden has been put in terms of domestic coordination and facilitation including ownership responsibility.

Analysis of the Project implementation yield the following lessons learned:

- For peer-review purposes, active involvement and continuous cooperation and commitment of all relevant beneficiary institutions at all stages of the assessment process is crucial for successful organisation of the assessment and implementation of the outstanding recommendations;
- Continuous guidance and close exchange between the Project and beneficiaries at all stages of the assessment process through all possible channels of communication is of vital importance;
- More time, better sequencing of activities and higher absorption capacities of beneficiary institutions are necessary for successfully conducting the simultaneous

joint assessment of AC and AML/CFT frameworks which cover four evaluation rounds of GRECO and MONEYVAL (something that member states undertook at different stages over a span of 15 years).

PECK successful experience and lessons learned are already used and extended *inter alia* in the on-going and future cooperation with Kosovo by other CoE monitoring instruments (GRETA in the area of trafficking in human beings and CEPEJ in relation to the efficiency of justice). From a project implementation perspective, challenges and lessons learned during the implementation of PECK have been taken into account in the design and sequencing of activities under the follow-up Project (PECK II) which should start in the near future. Namely, PECK II will pay particular attention to further streamlining and enhancing interagency cooperation and coordination in the economic crime area through targeted technical assistance activities.

7.2 Recommendations

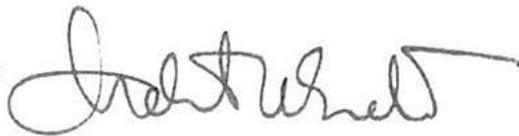
Kosovo authorities

- Make more vigorous and sustainable efforts to implement PECK pending recommendations in order to bring AC and AML/CFT frameworks in compliance with respective international and European standards, thereby moving forward with the EU integration agenda;
- Increase policy-level support for AC and AML/CFT issues at the level of the government and legislature with the aim of implementing key outstanding reform recommendations through legislative and policy changes;
- Keep integration of European and international AC and AML/CFT standards as a key milestone for all future reforms at a domestic level;
- Continue to develop an effective framework for interagency cooperation and information sharing between KAA, FIU, law enforcement authorities and the prosecution through implementation of systemic and practical information sharing mechanisms based on PECK findings and recommendations;
- Use PECK findings and recommendations when engaging with the international community active in Kosovo, particularly in terms of prioritising and coordinating technical assistance and capacity building efforts, including any future project based mentoring and advisory scheme;
- Apply and further strengthen knowledge and experience acquired during the implementation of the current Project in the follow-up PECK II Project by cooperating and participating in activities more actively and efficiently.

- *Project design and implementation*
- Take into account absorption capacities of beneficiary institutions in the design and sequencing of Project activities;
- Allocate more time between the initial assessment and the assessment of the progress made by the authorities to implement the recommendations.

Name of the contact person for the Action: Ardita Abdiu

Signature:



Date:

21 December 2015

8 LIST OF ANNEXES

Annex I: Visibility actions

Annex II: Revised Workplan

Annex II: List of Technical Papers

8.1 Annex I: Visibility action

The Project paid special attention to the visibility of its actions. Project news, events and outputs/deliverables were regularly reported on the Council of Europe Economic and Crime Cooperation Unit's website (www.coe.int/corruption), and the section exclusively dedicated to the PECK project: www.coe.int/peck

The Project ensured the visibility of the EU's contribution at all stages of its activities. The Council of Europe took all appropriate measures to publicise the fact that the Project funding has been received from a European Union agreement. All Project related documents and deliverables acknowledged that actions had been carried out "with funding from the European Union" by also displaying in an appropriate manner the European Union logo. Furthermore, notepads, pens, bags, USB keys and folders with the Project title and logo were regularly distributed during the activities, and the Project banner was displayed in conference rooms.

Two high-level visibility conferences were organised to present the findings and recommendations of the assessment reports to a wide range of domestic and international stakeholders, civil society and media. These events were extensively reported in the local media, particularly the second high-level conference which was held in conjunction with the Project Closing Conference with 15 articles dedicated to it. PECK publications – Final Assessment Reports in English, Albanian and Serbian (see below) were also widely disseminated to all relevant stakeholders. Findings of the Assessment and Follow-up Reports were often quoted and reported on by the local media and civil society organisations in the course of the Project implementation.

Project Final Conference, Pristina, 28 April 2015



Local media

<https://www.youtube.com/watch?v=IKG8kxdkJxU>

<http://botasot.info/kosova/398804/kuci-lufta-kunder-korrupsionit-proces-i-veshtire/>

<http://botasot.info/kosova/398859/kuci-bashke-mund-te-luftojne-kunder-pastrimit-te-parave/>

<http://www.md-ks.net/?page=1,8,1551>

<http://www.kosovapress.com/sq/siguri/kuci-bashke-mund-te-luftojne-kunder-pastrimit-te-parave-dhe-financimit-te-terrorizmit-41158/>

<http://koha.net/?id=27&l=55011>

<http://www.evropaelire.org/content/article/26983293.html>

<http://www.telegrafi.com/lajme/lufta-kunder-korrupsionit-proces-i-veshtire-2-62642.html>

<http://www.indeksonline.net/?FaqeID=2&LajmID=157009&thekso=PECK>

<http://kosova-sot.info/lajme/7153/10-milion-euro-per-luftimin-e-krimet-korrupsionit-e-terrorizmit/>

<http://www.rtklive.com/?id=2&r=28738>

<https://www.youtube.com/watch?v=IKG8kxdkJxU>

<http://kosovain.eu/sq/Kosove/43302>

<http://www.kosova.info/lajme/kuci-sfidues-lufta-kunder-korrupsionit-e-shpelarjes-se-parave.html>

<http://www.abcnews.al/lajme/rajoni/7/55524>

<https://shqiptarja.com/lajme%20shkurt/2749/kosove---bashk-punimi-nd-rinstitucional--el-si-i-suksesit-n--luftimin-e-korrupsionit-288607.html>

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<http://www.ekonomia-ks.com/?page=1,11,355735>

<http://www.telegrafi.com/lajme/korrupsioni-pengese-per-rritjen-ekonomike-2-33019.html>

Council of Europe

<http://www.coe.int/en/web/programmes/news/>

http://www.coe.int/t/dghl/cooperation/economiccrime/corruption/Projects/PECK-Kos/PECK_default_en.asp

Screenshot of the Project website



Council of Europe

The Council in brief
Human Rights
Democracy
Rule of Law
Organisation
47

Council of Europe > Human Rights and Rule of Law > Action against economic crime

Action against economic crime

BACK

PECK-Kosovo* - Project against Economic Crime

*This designation is without prejudice to positions on status, and is in line with UNSCR 1244 and the ICJ Opinion on the Kosovo Declaration of Independence.



Funded by the European Union and the Council of Europe



Implemented by the Council of Europe

Corruption remains a serious challenge for Kosovo*. According to a number of surveys conducted by national and international organizations, control of corruption has proved to be scarce. In the field of money laundering and terrorism financing, recent assessments have also shown that there is a need for continuous legislative and organizational reforms to bring Kosovo* in line with European and international standards. While reforms related to corruption and money laundering have been underway for several years, there has been no structured, longer-term process to assess the progress and impact achieved up to date and highlight short-medium and long term reform steps. In view of this and while acknowledging the need of a structured and unified assessment process in Kosovo* and in these areas (Anti-corruption and Anti-Money Laundering and Countering of Terrorist Financing based on international/regional standards and practices as well as the successful experience of previous interventions of the Council of Europe carried out in Kosovo*), a project to address actions as such was designed in cooperation with counterpart institutions in Kosovo* and European Union Office in Pristina. As a result an IPA 2012* Contribution Agreement as a Joint Programme was signed in January 2012 between the Council of Europe and the European Union Office in Pristina. The PECK Project started on 1 February 2012, with a duration of 30 months and a budget of 1,200,000 Euro (EU funds: 83.3% and CoE funds: 16.7%). The Project's overall objective is to contribute to the democracy and the rule of law through the prevention and control of corruption; money laundering; and the financing of terrorism in Kosovo*. The Project's purpose is to strengthen institutional capacities to counter corruption; money laundering; and the financing of terrorism in Kosovo* in accordance with European standards through assessments and recommendations for improving and streamlining reforms to combat economic crime. The Office of Good Governance (OGG), the Kosovo* Anti-Corruption Agency (KAA), and the Financial Intelligence Centre (FIC), are the main counterpart institutions for this Project.

PROJECT DOCUMENTATION & DELIVERIES

- ▶ Project Summary
English/Albanian/Serbian
- ▶ Description of Action (DoA)
- ▶ Workplan
English/Albanian/Serbian
- ▶ Workplan (Extension)
English/Albanian/Serbian
- ▶ Assessment Schedule (Cycle 1)
English/Albanian/Serbian
- ▶ Assessment Schedule (Cycle 2)
English/Albanian/Serbian
- ▶ Inception Report
English/Albanian/Serbian
- ▶ Progress Reports
- ▶ Technical Papers

ASSESSMENTS

- ▶ Terms of Reference on the Assessment procedure
English/Albanian/Serbian
- ▶ Cycle 1:
 - Assessment Report (AC)
English/Albanian/Serbian
 - Assessment Report (AML/CFT)
English/Albanian/Serbian
- ▶ Follow-up:
 - Follow-up report (AC)
English/Albanian/Serbian
 - Compliance Matrix (AC)
English/Albanian/Serbian
 - Follow-up report (AML)
English/Albanian/Serbian
- ▶ External links to PECK reports

QUESTIONNAIRES

- ▶ Cycle 1:
 - Questionnaire (AC)
English/Albanian/Serbian
 - Summary of Questionnaire (AC)
English/Albanian/Serbian
 - Questionnaire (AML/CFT)
English/Albanian/Serbian
 - Summary of Questionnaire (AML/CFT)
English/Albanian/Serbian
- ▶ Cycle 2:
 - Questionnaire (AML/CFT)
English/Albanian/Serbian

PHOTO GALLERY

- ▶ 2015
- ▶ 2014
- ▶ 2013
- ▶ 2012

Activities

- ▶ February - November 2014
- ▶ 2013
- ▶ 2012

CONTACTS

- ▶ PECK-Project

NEWS

Support to the revision of the AML/CFT Law (Pristina, Kosovo*, 22 June 2015)



The PECK Project continued to support the revision of the AML/CFT Law of Kosovo in line with relevant international standards. Following the PECK experts' recent mission and discussions (Pristina, 25-27 March 2015) held with the main stakeholders and members of the Working Group set up by the Ministry of Finance for the revision process, the EU prepared the first draft amendments to the AML/CFT Law and submitted them to the Project for review and comments at the end of May. PECK experts prepared a legal opinion, analysing the compliance of the draft amendments with international standards and providing concrete recommendations for addressing identified deficiencies. The opinion was complemented with a revised version of the draft Law, with proposed amendments and explanatory comments.

The experts presented their main findings and recommendations to the Working Group at the final workshop held at the Council of Europe Office in Pristina on 22 June 2015. The experts' presentations and interactive discussions proved very useful as they helped the Working Group to better understand the rationale of the recommendations and proposed amendments to improve the compliance of the AML/CFT Law with relevant international standards. The PECK Project team urged the Working Group to duly consider the PECK recommendations and to have a more intensive and wide consultation process with all relevant stakeholders before finalising and submitting the draft Law to the Government and the Assembly. This would enhance the ownership and commitment of all involved beneficiaries to implement the amended Law once adopted, and would contribute to having a more robust and compliant AML/CFT regime in Kosovo.

▶ Agenda English / Albanian:

▶ Presentations:
Mr. Herbert Zammit Laferla, Council of Europe expert: "Revision Process of the AML/CFT Law"
Presentation 1 - Presentation 2;
Mr. Giuseppe Lombardo, Council of Europe Expert: "Main findings and recommendations on repressive measures and institutional framework".

PECK Project Closing Conference (Pristina, Kosovo*, 28 April 2015)



The European Union (EU) and the Council of Europe (CoE) Joint Project against Economic Crime in Kosovo* (PECK) held its Closing Conference on 28 April 2015 in Pristina. The Project, co-funded by the EU and CoE and implemented by the CoE, aims to strengthen the capacities of Kosovo* institutions to prevent and fight corruption, money laundering and the financing of terrorism.

The Conference presented the key findings and recommendations of the Final Assessment Reports on Kosovo's* compliance with international standards in the areas of Anti-Corruption (AC) and Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT). The Conference also reflected on project outcomes, lessons learned from the assessment exercise and future follow-up. It brought together ministerial and other high-level representatives of relevant domestic institutions, international experts, representatives of key stakeholders on the part of international organisations, the industry and civil society. Ministers of Justice and Internal Affairs underlined in their opening remarks the importance of PECK project findings in the fight against corruption, money laundering and financing of terrorism, and reiterated commitment of Kosovo* authorities to implement the outstanding recommendations.

The Assessment Reports represent the most comprehensive evaluation of law, policy and practice in the AC and AML/CFT areas that has ever been carried out in Kosovo*. They have been prepared on the basis of GRECO and MONEYVAL assessment methodologies specifically tailored for Kosovo*, over the two successive cycles carried out during 2012-2014. The Reports provide concrete guidance to the authorities in their efforts to address these institutional and corruption, money laundering and the financing of

Project publications

COMPLIANCE WITH INTERNATIONAL ANTI-CORRUPTION STANDARDS



33 A comprehensive assessment of the anti-corruption framework with recommendations for improvement

Assessment Report

Project against Economic Crime (PECK)

| | | |
|---|--|---|
| <p>Funded by the European Union and the Council of Europe</p>  | <p>COUNCIL OF EUROPE</p>  | <p>Implemented by the Council of Europe</p> |
|---|--|---|

PËRPUTHSHMËRIA ME STANDARDET NDËRKOMBËTARE KUNDËR KORRUPSIONIT



33 Një vlerësim gjithëpërfshirës i kornizës kundër korrupsionit me rekomandime për përmirësim

Raport Vlerësimi

Projekti kundër Krimet Ekonomik (PECK)

| | | |
|---|--|---|
| <p>Funded by the European Union and the Council of Europe</p>  | <p>COUNCIL OF EUROPE</p>  | <p>Implemented by the Council of Europe</p> |
|---|--|---|

USKLAÐENOST SA MEÐUNARODNIM STANDARDIMA ZA BORBU PROTIV KORUPCIJE



33 Sveobuhvatna procena okvira za borbu protiv korupcije sa preporukama za unapređenje

Izveštaj o oceni

Projekat za borbu protiv privrednog kriminala (PECK)

| | | |
|---|--|---|
| <p>Funded by the European Union and the Council of Europe</p>  | <p>COUNCIL OF EUROPE</p>  | <p>Implemented by the Council of Europe</p> |
|---|--|---|

COMPLIANCE WITH INTERNATIONAL AML/CFT STANDARDS



➤ A comprehensive assessment of the anti-money laundering and combating the financing of terrorism framework with recommendations for improvement

Assessment Report

Project against Economic Crime (PECK)



PËRPUTHSHMËRIA ME STANDARDET NDËRKOMBËTARE TË LPP/LFT-së



➤ Një vlerësim gjithëpërfshirës për luftimin kundër pastrimit të parave dhe luftimin kundër financimit të terrorizmit me rekomandime për përmirësim

Raport Vlerësimi

Projekti kundër Krimit Ekonomik (PECK)



USKLAÐENOST SA MEÐUNARODNIM STANDARDIMA BPPN/BPFT



➤ Sveobuhvatna procena okvira borbe protiv pranja novca i finansiranja terorizma sa preporukama za unapređenje

Izveštaj o oceni

Projekat za borbu protiv privrednog kriminala (PECK)



8.3 Annex III: List of PECK Technical Papers/deliverables

| Date/Year | Title | Prepared by CoE Experts/CoE Secretariat | Languages |
|----------------|---|---|------------|
| March 2012 | Terms of Reference on the Assessment Procedure | CoE Secretariat | EN/ALB/SRB |
| April 2012 | Summary of AML/CFT assessment questionnaire | CoE Secretariat | EN/ALB/SRB |
| April 2012 | Summary of AC assessment questionnaire | CoE Secretariat | EN/ALB/SRB |
| June 2012 | Questionnaire on compliance with international standards in the AML/CFT area – Cycle 1 | CoE Secretariat | EN/ALB/SRB |
| June 2012 | Questionnaire on compliance with international standards in the area of anti-corruption – Cycle 1 | CoE Secretariat | EN/ALB/SRB |
| September 2012 | Expert Opinion on Law No.03/L-196 “On the Prevention of Money laundering and Terrorist Financing” and Draft Law on Amending and Supplementing Law No.03/L-196 “On the Prevention of Money laundering and Terrorist Financing” | Nicolas Burbidge Jens Madsen | English |
| June 2013 | Assessment Report on compliance with international standards in the AC area – Cycle 1 | Flemming Denker, Drino Galicic, Jean-Christophe Geiser and Edmond Dunga | EN/ALB/SRB |
| June 2013 | Assessment Report on compliance with international standards in the AML/CFT area – Cycle 1 | Herbert Zammit Laferla, Lajos Korona, Cedric Woodhall, Edmond Dunga and Igor Nebyvaev | EN/ALB/SRB |
| December 2013 | Assessment Questionnaire on compliance with international standards in the AML/CFT area – Cycle 2 | CoE Secretariat | EN/ALB/SRB |
| December 2013 | AC compliance matrix | CoE Secretariat | EN/ALB/SRB |
| December 2013 | Advisory Paper on the draft amendments to the | Drino Galicic and Edmond | English |

| Date/Year | Title | Prepared by CoE Experts/CoE Secretariat | Languages |
|---------------|---|--|------------|
| | Law on prevention of conflict of interests in discharge of public functions | Dunga | |
| April 2014 | Follow up report on compliance with international standards in the AC area | Flemming Denker, Drino Galicic, Jean-Christophe Geiser and Edmond Dunga | EN/ALB/SRB |
| April 2014 | Follow up report on compliance with international standards in the AML/CFT area | Frederic Cottalorda, Herbert Zammit Laferla, Lajos Korona and Edmond Dunga | EN/ALB/SRB |
| March 2014 | Interactive Statistics on Economic Crime in Kosovo | Prof. Dr. Petrus C. van Duyne and Steve Bond | EN/ALB |
| December 2014 | Assessment Report on compliance with international standards in the AC area – Cycle 2 | Flemming Denker, Drino Galicic, Jean-Christophe Geiser and Edmond Dunga | EN/ALB/SRB |
| December 2014 | Assessment Report on compliance with international standards in the AML/CFT area – Cycle 2 | Frederic Cottalorda, Lajos Korona, Herbert Zammit Laferla and Edmond Dunga | EN/ALB/SRB |
| June 2015 | Legal opinion on the redrafting of Law No. 03/L-196 on the Prevention of Money Laundering and Terrorist Financing of Kosovo | Herbert Zammit Laferla, Giuseppe Lombardo and Edmond Dunga | EN/ALB |

The Final Report gives an overview of activities implemented within the framework of the European Union and Council of Europe Joint Project against Economic Crime in Kosovo (PECK) and analysis of project results and achievements.

PECK project, co-funded by the European Union and the Council of Europe and implemented by the Council of Europe, lasted from 1 February 2012 to 30 June 2015 with the total budget of 1,200,000 EUR. Its main objective was to strengthen institutional capacities to counter corruption, money laundering and the financing of terrorism in Kosovo in accordance with European standards, through in-depth assessments and provision of recommendations for improving and streamlining economic crime reforms. The main deliverables of the project are first of their kind comprehensive and structured assessment reports on compliance of anti-corruption and anti-money laundering and combating the financing of terrorism frameworks with applicable international standards, which have been prepared based on GRECO and MONEYVAL assessment methodologies.

www.coe.int/peck

The Economic Crime and Cooperation Unit (ECCU) at the Directorate General Human Rights and Rule of Law of the Council of Europe is responsible for designing and implementing technical assistance and co-operation programmes aimed at facilitating and supporting anti-corruption, good governance and anti-money laundering reforms in the Council of Europe member states, as well as in some non-member states.

www.coe.int/corruption

The Council of Europe is the continent's leading human rights organisation. It comprises 47 member states, 28 of which are members of the European Union. All Council of Europe member states have signed up to the European Convention on Human Rights, a treaty designed to protect human rights, democracy and the rule of law. The European Court of Human Rights oversees the implementation of the Convention in the member states.

www.coe.int

The European Union is a unique economic and political partnership between 28 democratic European countries. Its aims are peace, prosperity and freedom for its 500 million citizens – in a fairer, safer world. To make things happen, EU countries set up bodies to run the EU and adopt its legislation. The main ones are the European Parliament (representing the people of Europe), the Council of the European Union (representing national governments) and the European Commission (representing the common EU interest).

<http://europa.eu>

