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Third Evaluation Round

Addendum to the Second Compliance Report on Azerbaijan

"Incriminations (ETS 173 and 191, GPC 2)"

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"Transparency of Party Funding"

Adopted by GRECO
at its 70th Plenary Meeting
(Strasbourg, 30 November – 4 December 2015)

I. INTRODUCTION

1. The Addendum to the Second Compliance Report assesses further measures taken by the authorities of Azerbaijan since the adoption of the Second Compliance Report in respect of the recommendations issued by GRECO in its Third Round Evaluation Report on Azerbaijan. It is recalled that the Third Evaluation Round covers two distinct themes, namely:
 - **Theme I – Incriminations:** Articles 1a and 1b, 2-12, 15-17, 19 paragraph 1 of the Criminal Law Convention on Corruption (ETS 173), Articles 1-6 of its Additional Protocol (ETS 191) and Guiding Principle 2 (criminalisation of corruption).
 - **Theme II – Transparency of party funding:** Articles 8, 11, 12, 13b, 14 and 16 of Recommendation Rec(2003)4 on Common Rules against Corruption in the Funding of Political Parties and Electoral Campaigns, and - more generally - Guiding Principle 15 (financing of political parties and election campaigns).
2. The Third Round Evaluation Report was adopted at GRECO's 48th Plenary Meeting (1 October 2010) and made public on 18 November 2010, following authorisation by Azerbaijan (Greco Eval III Rep (2010) 2E, [Theme I](#) and [Theme II](#)). The subsequent Compliance Report was adopted at GRECO's 57th Plenary Meeting (19 October 2012) and was made public on 8 January 2013 ([Greco RC-III \(2012\) 12E](#)). The Second Compliance Report was adopted at GRECO's 65th Plenary Meeting 10 October 2014 and made public on 2 April 2015 ([Greco RC-III \(2014\) 13E](#)).
3. On 31 July and 1 November 2015, the authorities of Azerbaijan submitted the additional information regarding the actions taken to implement those recommendations that were partly implemented or not implemented according to the Second Compliance Report. That information served as a basis for the present Addendum to the Second Compliance Report.
4. GRECO selected Liechtenstein and Spain to appoint Rapporteurs for the compliance procedure. The Rapporteurs appointed for the Second Compliance Report were Mr Patrick RITTER on behalf of Liechtenstein, and Mr Rafael VAILLO RAMOS, on behalf of Spain. They were assisted by GRECO's Secretariat in drawing up the Addendum to the Compliance Report.

II. ANALYSIS

Theme I: Incriminations

5. It is recalled that GRECO addressed 9 recommendations to Azerbaijan in respect of Theme I in its Evaluation Report. In the subsequent Compliance Report, GRECO concluded that recommendations i, ii, iv, v, vi, viii and ix had been implemented satisfactorily and that recommendations iii and vii had been partly implemented. In the Second Compliance Report, recommendations iii and vii remained partly implemented. Compliance with those recommendations is dealt with below.

Recommendation iii.

6. *GRECO recommended to criminalise active and passive bribery of domestic and foreign jurors and arbitrators in accordance with Articles 2, 3, 4, 5 and 6 of the Additional Protocol to the Criminal Law Convention on Corruption (ETS 191) and to sign and ratify this instrument as soon as possible.*

7. GRECO recalls that this recommendation was considered partly implemented in the Compliance Report since Protocol ETS 191 was signed but not ratified at the time. Moreover, the note to Section 308 of the Penal Code (PC) had been amended so as to refer to “arbiters of foreign and national arbitration courts, foreign and national jurors” for the purposes of defining the scope of applicability of the bribery provisions. While these amendments were sufficient to address adequately jurors, GRECO found that the concept of “arbiters of foreign and national arbitration courts” was not broad enough to cover arbitrators (domestic and foreign) in the meaning of Article 1, paragraph 2 of ETS 191, including those acting on the basis of an arbitration agreement between private persons outside an arbitration court. In the Second Compliance Report, GRECO welcomed that Azerbaijan had ratified Protocol ETS 191 (it became effective as of April 2013) and it accepted further explanations given by the authorities that the situation of domestic arbitrators did not raise concerns since arbitration in Azerbaijan is only possible in commercial matters under the Law on International Arbitrage. Despite the improved compliance with the recommendation, GRECO concluded in the Second Compliance Report that the recommendation remained partly implemented as ETS 191¹ is not limited to commercial arbitrators and stated that it would be preferable to spell out clearly that Section 308 PC refers to arbitrators who perform their functions under the law of Azerbaijan or of another country.
8. The authorities of Azerbaijan have not submitted any new information in respect of this recommendation.
9. GRECO concludes that recommendation iii remains partly implemented.

Recommendation vii.

10. *GRECO recommended to analyse and accordingly revise the automatic – and mandatorily total – exemption from punishment granted to perpetrators of active bribery who report to law enforcement authorities.*
11. GRECO recalls that this recommendation was categorised as partly implemented in the Compliance Report; the practice with regard to the special defence provision contained in the note to Section 312 PC had been analysed but no subsequent decision had been taken concerning any amendments. The authorities had indicated that since the legal powers of the Anti-Corruption Directorate under the General Prosecutor (ACD) had increased, the criminal law response relied to a lesser extent on the “effective regret” mechanism to detect corruption-related offences. In the Second Compliance Report, the authorities indicated that the provisions on effective regret contained in the note to Section 312 PC remained under scrutiny and as a result that effective regret had been applied in a more limited number of cases as compared to previous years and provided some figures to that end. GRECO noted that the practice regarding the effective regret mechanism as laid down in Section 312 PC and its note had been kept under review, but again, the precise circumstances in which effective regret – as such – is applied did not appear to have been examined; nor had amendments been made or even considered. GRECO recalled that the bribe-giver in Azerbaijan is not prosecutable provided s/he reports the offence before it is discovered or before s/he learns that the offence has already been discovered and reiterated the misgivings about the automatic nature of the defence, which may lead to situations where very serious cases of active corruption could go totally unpunished. Furthermore, the law could be misused by the bribe-giver as a means of exerting pressure on the

¹ The Protocol is not limited to arbitration in commercial matters; as stated in paragraph 12 of the [Explanatory Report to ETS 191](#) “(...) it should be pointed out, that the scope of this Protocol is not limited to commercial arbitration. Consequently, the concept of “arbitration agreement” should be understood in a broad way in order to reflect the reality and variety of civil, commercial and other relations, and not be limited to the formal expression of commitments based on reciprocal obligations.”

bribe-taker to obtain further advantages (Evaluation Report, paragraph 61). No concrete plan for changing the situation was reported.

12. The authorities have not submitted any new information in respect of this recommendation.
13. GRECO concludes that recommendation vii remains partly implemented.

Theme II: Transparency of Party Funding

14. It is recalled that GRECO in its Evaluation Report addressed 8 recommendations to Azerbaijan in respect of Theme II. The Compliance Report concluded that recommendations ii, iii, iv and v had been partly implemented and recommendations i, vi, vii and viii had not been implemented. In the Second Compliance Report, GRECO concluded that recommendation iii had been implemented satisfactorily. Recommendations ii, iv-vii had been partly implemented and recommendation i not implemented. Compliance with the pending recommendations is dealt with below.

Recommendation i.

15. *GRECO recommended to extend the financial and accounting reference period applicable to election campaigns so that financial reports on election funds reflect more closely the resources and expenditure devoted to these campaigns.*
16. GRECO recalls that this recommendation was considered not implemented in the Compliance Report as the authorities had taken no action to deal with it at the time. In the Second Compliance Report, the authorities reiterated that the situation remained satisfactory, including the financial reference period of 50 to 30 days before the election day as provided for in the Election Code (EC). The authorities also referred to on-going amendments on centralisation of the supervisory responsibility for party and election campaign financing to the Central Election Commission (CEC) which would provide the CEC with the power to request from the political parties any additional information on their financial activity and reduce risks of circumvention of the reference period with regard to party candidates. GRECO noted that consolidated supervisory powers would not automatically solve the problems aimed at by the recommendation, even if the reform were to be carried out as intended and concluded that recommendation i had not been implemented.
17. The authorities of Azerbaijan now submit that the new centralised monitoring carried out by the CEC, since the entering into force (4 November 2014) of the amendment to the Law on Political Parties, together with a decision of the CEC (April 2015) to establish two structural units within the CEC has increased the possibilities for more profound monitoring of the adherence of financial election reporting within the reference period.
18. GRECO takes note of the position of the authorities which in principle remains the same as the one referred to in the Second Evaluation Report, namely that centralised and extended monitoring functions and resources provided to the CEC, would have an impact on the issue raised in the current recommendation. GRECO takes note of the new legislation referred to which is relevant in respect of some recommendations below. That said, the issue of a too short reference period for election campaign financing, which was identified in the Evaluation Report (paragraph 84) as a potential risk area that could lead to circumvention of the transparency rules of election campaigns is principally a different matter, which is not solved through stricter monitoring.

19. GRECO concludes that recommendation i remains not implemented.

Recommendation ii.

20. *GRECO recommended to clearly define and regulate donations, membership fees and other permitted funding sources in the Law on Political Parties and to align its financing provisions with the transparency standards set by the Electoral Code.*

21. GRECO recalls that the present recommendation was considered partly implemented in the Compliance Report following amendments to sections 17 and 19 of the Law on Political Parties (LPP), relating to the financing of the activities of political parties and to donations, whether financial or in kind. The amended law provides, *inter alia*, that monetary donations to political parties are to be made through the banking system and donations in kind to be valued at the market value. In the Second Compliance Report, GRECO took note of draft amendments to the LPP concerning regulation of membership fees and donations (draft Article 18-1.1 LPP). In so far as other income sources are concerned, these were still only regulated in civil and tax legislation. Moreover, GRECO also noted that draft legislation aiming at establishing ceilings on donations was underway (draft Article 19.7 LPP). It concluded that the recommendation was partly implemented as not all the concerns of the recommendation had been addressed and some draft legislation was not adopted.

22. The authorities now refer to what was earlier reported (see paragraph 21) and add that the LPP was amended on 30 September 2014 (entered into force on 4 November 2014). They refer to Articles 18-1.1 and 19.7 LPP which read:

18-1.1. Membership is a regularly paid resource in the form of money paid by party members according to the statute of the party. Payments which exceed the defined membership fee shall be considered as a donation.

19.7. The amount of donations given by a person to one or several parties in a year shall not exceed ten thousand manats (9 850 Euro)".

Furthermore, the authorities have submitted a decree of the Cabinet of Ministers of Azerbaijan (#263 of 16 November 2015) providing rules concerning the expected content of the financial reporting of political parties. The Decree also includes a list of assets, debts, income and expenditure that have to be reported (as well as a template of a reporting form).

23. GRECO takes note of the information provided. As far as the first part of the recommendation is concerned, GRECO accepts that Article 18-1.1 LPP defines and makes a distinction between membership fees and donations, although the definition of donations is not very clear. GRECO is pleased that Article 19.5 LPP (referred to in the Compliance Report, paragraph 52) provides that donations in kind are to be accounted for at their market value. Moreover, "other permitted funding sources" have been subject to further definitions and detailed regulations in the Decree of the Cabinet of Ministers (#263 of 2012), which lists assets, debts, income and expenses that are to be included in the reports. This part of the recommendation is therefore also implemented. As far as the second part of the recommendation is concerned, GRECO welcomes Article 19.4 LPP which provides that monetary donations are to be done in the form of bank transfer, and Article 19.7 LPP introducing ceilings on donations, which is in line with the Electoral Code, as requested. These achievements appear to be in line with the requirements of the recommendation.

24. GRECO concludes that recommendation ii has been implemented satisfactorily.

Recommendation iv.

25. *GRECO recommended (i) to require that party accounts be disclosed in a way which provides for easy and timely access by the public; and (ii) to find appropriate ways to support political parties in complying with these transparency regulations.*
26. GRECO recalls that this recommendation was partly implemented in the Compliance Report, as political parties had been required to publish annual financial statements through the media. However, GRECO had misgivings about easy and timely access by the public and stressed that there would be advantages in a system where financial reports were to be made public by an independent supervisory body, possibly on the Internet. In the Second Compliance Report GRECO noted some progress in that there were plans to provide for central publishing of party accounts on the webpage of the CEC; however, the recommendation remained partly implemented.
27. The authorities of Azerbaijan now report that the adopted amendments to the LPP (30 September 2014) which took effect on 4 November 2014, provide that political parties are to submit annual financial reports, together with an auditor's opinion, to the CEC no later than 1 April (Article 21.2). Article 21.5 of the same Law provides that political parties are to make public their annual reports together with the auditor's opinion. Article 21.6 LPP provides that the annual reports are to be made public on the webpage of the CEC. Moreover, a decree of the CEC (#9/79 of 15 May 2015) indicates (Article 2.5) that the publication of reports is to be done by the CEC within 24 hours from the inspection of the correctness of the reports by the monitoring units of the CEC. Annual reports are normally placed on the webpage of the CEC within 3-15 days. The authorities add that, currently, all of the annual reports are available online. The law does not provide specific timeframes for the political parties, nor in respect of the CEC, for making the accounts public; it only requires that they must be published. On 9 July 2015, the CEC organised a special seminar on "preparing, collecting, monitoring and publication of financial reports of political parties". This event was attended by media representatives. Moreover, the CEC organised a capacity building training course for representatives of political parties on 14 August 2015 and further such training is underway.
28. GRECO welcomes the additional information provided. The new legislation, which provides for centralised publishing of annual reports of political parties on the website of the Central Electoral Commission (CEC), aiming at providing public access to the annual accounts of political parties, constitutes a clear improvement of the situation in comparison with the previous state of play. That said, GRECO notes with concern that the regulations do not provide for any specific time frame within which reports are to go online after they have been received by the CEC. It is true that a CEC Decree (#9/79, Article 2.5) provides that reports are to be published within 24 hours after they have been checked by the monitoring units of the CEC; however, no deadlines for the checking of the reports exist according to the Decree. Even though it would appear that the CEC has made the reports public within a reasonable time (3-15 days) in the initial application of the law, GRECO would strongly suggest that a clear deadline for the publication be stipulated from the reception of a report by the CEC, regardless of the time needed for checking the correctness of the report. Moreover, some initial steps have been taken to support the parties in complying with the new regulations and GRECO looks forward to receiving more information in this respect. It follows that, despite the significant progress made, some further measures are still missing in order to fully comply with the recommendation: *nota bene* in respect of "timely access" and "support to political parties".
29. GRECO concludes that recommendation iv remains partly implemented.

Recommendation v.

30. *GRECO recommended (i) to ensure, as appropriate, independent auditing of the books and accounts of political parties; and (ii) to find appropriate ways to support political parties in complying with such a requirement.*
31. GRECO recalls that this recommendation was considered partly implemented in the Compliance Report, despite the fact that mandatory auditing of party accounts by independent external professionals had become a legal requirement in 2012 since appropriate support to some parties to comply with the new auditing requirement had not materialised, as required in the second part of the recommendation. The same conclusion was maintained in the Second Compliance Report.
32. The authorities of Azerbaijan have not reported any new developments in respect of this recommendation.
33. GRECO welcomes in principle that political parties are required to have their accounts audited by independent external professionals, as requested in the first part of the recommendation. That said, it is noted that the law is not sufficiently flexible, for example, to exclude or limit this requirement in respect of small or insignificant parties as such auditing requirements may cause unreasonable burdens upon them. In this context, GRECO is aware that no party in Azerbaijan, except the ruling party, appears to have any significant resources, as stated in the Evaluation Report (paragraph 79). A blunt auditing requirement upon all parties with no distinction may therefore even be detrimental for the development of pluralistic democracy in Azerbaijan. As there appear to be no possibilities for small or insignificant parties to receive any forms of support to comply with the current auditing requirement, it follows that the second part of the recommendation is not fulfilled.
34. GRECO concludes that recommendation v remains partly implemented.

Recommendation vi.

35. *GRECO recommended (i) to ensure more substantial and pro-active monitoring of the financial reports on election funds of political parties and election candidates, including a material verification of the information submitted as well as investigation of financing irregularities; and (ii) to strengthen the independence of the election commissions in relation to the supervision of election campaign financing.*
36. GRECO recalls that this recommendation was considered not implemented in the Compliance Report as no particular measures had been taken to address the recommendation. In the Second Compliance Report, GRECO noted that the Central Election Commission (CEC) had organised two specialised training courses on electoral legislation for members of constituency and precinct election commissions, for chairpersons of constituency election commissions and in the regions for the members of constituency and precinct election commissions, involving more than 6 000 officials. Moreover, prior to the 2013 presidential elections, the CEC had established a specialist working group to review the financial documentation of candidates' incomes, property and assets. The authorities also referred to intended amendments to the LPP in order to attribute the party financing supervision to the CEC. On the basis of these measures, GRECO concluded that the recommendation had been implemented partly.
37. The authorities now add (to the above) that amendments to the LPP on 30 September 2014, which entered into force on 4 November 2014, provide the CEC with the role as the central

authority for supervision, both in respect of the regular party funding and election financing, which makes the CEC the exclusive monitoring body responsible for all forms of political financing. Moreover, the CEC decided, on 8 April 2015, to establish two structural units within the CEC for the purpose of collecting, monitoring and analysing financial reports from the political parties. These units have eight new staff as of 1 April 2015 according to the authorities. The authorities also stress that the election commissions are still involved in the monitoring of the election funds; Article 97 of the Election Code provides that the CEC and the constituency election commissions are to establish a supervisory audit service to ensure the control over the election funds (registration, use of the funds and sources of funding).

38. GRECO takes note of the various measures taken to progressively improve the supervision of the financing of election campaigns. A significant change was to make the CEC the ultimate supervisory body for election financing. GRECO indicated already in the Second Compliance Report that such a move would go in the right direction, provided the CEC was given the appropriate powers and guarantees of operational independence. GRECO also stressed the need to further clarify the connections between the CEC and the various election commissions for a consistent monitoring. In this context the authorities have referred to Article 97 of the Election Code, which, *inter alia*, establishes the roles of the CEC and the constituency election commissions in respect of the monitoring of election funds. As far as the first part of the recommendation is concerned, GRECO takes the view that the centralisation of the monitoring of election funds under the control of the CEC and the additional resources brought to this body in the form of additional staff as well as the coordination with the election commissions are measures that have the potential to ensure more substantial and pro-active monitoring in this respect. Concerning the second part of the recommendation, GRECO notes that the partisan composition of the election commissions remains the same now as it was described in the Evaluation Report (paragraph 93). Furthermore, the composition of the CEC is equivalent to that of the election commissions as its 18 members are nominated and appointed by Parliament - six from majority parties, six from among independent MPs and 6 from minority parties. Also this body has a clear partisan composition, which was one of the concerns raised in the Evaluation Report. It follows that this part of the recommendation has not been properly addressed.
39. GRECO concludes that recommendation vi remains partly implemented.

Recommendation vii.

40. *GRECO recommended to establish independent and substantial monitoring of the general financing of political parties, well-coordinated with the monitoring of election campaign funding.*
41. It is recalled that this recommendation was not implemented in the Compliance Report. Azerbaijan had in 2012 introduced a new Article 21.2 in the LPP which – in combination with a Presidential Decree of 8 May 2012 on the implementation of the amendment, designated that the Ministry of Finance receive the financial statements of political parties, without a clear mandate or adequate resources to perform monitoring of the financing of political parties. Above all, GRECO considered that the Ministry of Finance, as part of the Government, was not an independent body. In the Second Compliance Report, it was observed that three different authorities were involved in the monitoring of political financing: the Ministry of Finance as the receiver of financial statements, the Chamber of Accounts to monitor the use of state funding and the CEC to monitor election funding. However, the authorities also announced that it was foreseen to reassign the supervision over the financing of political parties and election campaigns exclusively to the CEC, in order to facilitate the overall coordination and to make the monitoring of campaign financing more effective.

42. The authorities now report that following the adoption of the amendments to the LPP in 2014 (which took effect as of 4 November 2014), the CEC has been designated as the central authority for the supervision over the general financing of political parties (Article 21.2 LPP). Article 21.6 provides that political parties are to submit their annual financial reports to the CEC by 1 April every year. Article 21.4-1 LPP provides that the CEC has the power to request extra information from the parties.
43. GRECO takes note of the information provided. As already mentioned in the Second Compliance Report, GRECO welcomes the adoption of new legislation which brings together all the political financing monitoring under the auspices of the CEC, which compared with the previous situation involving three different authorities (among them the Ministry of Finance which is not an independent body) appears as a promising step in the right direction. It has already been noted in relation to previous recommendations that the CEC has been provided with additional resources and staffing to carry out this work. It goes without saying that the conditions for better co-ordination between the monitoring of regular party financing and election campaign funding have a potential to increase when these two tasks have been given to the same authority. Despite these substantial improvements, GRECO remains concerned that the CEC has a clear partisan structure similar to the one of the election commissions which was criticised in the Evaluation Report (paragraph 93). GRECO takes the view that the CEC in its present composition cannot be regarded an independent body (from the political parties). As there are no other guarantees for an operational independence of this body, GRECO cannot conclude that the measures taken are fully in line with the recommendation.
44. GRECO concludes that recommendation vii remains partly implemented.

Recommendation viii.

45. *GRECO recommended to clearly define infringements of existing and yet-to-be-established regulations on transparency of election campaign funding as well as general party funding and to introduce effective, proportionate and dissuasive sanctions for these infringements, in particular, by extending the range of penalties available.*
46. GRECO recalls that the system of sanctions in place referred to in the Evaluation Report was described as rudimentary. The recommendation was considered not implemented in the Compliance Report; both the EC (for election campaign financing) and the LPP (for party financing) refer to the applicability of administrative, civil, financial or criminal sanctions as provided for in legislation, in case of violations, but these had never been spelled out clearly. The penalties available were left at the discretion of the Ministry of Justice and none had reportedly ever been applied. It is noted in the Compliance Report that following amendments in 2012, Section 22 LPP refers to the applicability of sanctions under the relevant law in case of breaches (without further precision). It was also noted that further legislative amendments were underway. In the Second Compliance Report, GRECO took note of the amendments to the Code of Administrative Violations (as detailed in that report) and reflected that some improvements had taken place in respect of sanctions for violations of the rules concerning party financing under the LPP. However, nothing had been done to improve the regime of sanctions relating to violations of the requirements concerning election campaign financing. GRECO concluded that the recommendation had been partly implemented and encouraged Azerbaijan to pursue its efforts to fully implement recommendation viii.
47. The authorities of Azerbaijan have not submitted any new information in respect of this recommendation.

48. GRECO concludes that recommendation viii remains partly implemented.

III. CONCLUSIONS

49. **In view of the conclusions contained in the previous Third Round Compliance Reports on Azerbaijan and in light of the above, GRECO concludes that to date, Azerbaijan has implemented satisfactorily or dealt with in a satisfactory manner nine of the seventeen recommendations contained in the Third Round Evaluation Report.** Seven further recommendations remain partly implemented and one recommendation remains not implemented.

50. More specifically, with respect to Theme I – Incriminations, recommendations i, ii, iv, v, vi, viii and ix have been implemented satisfactorily, and recommendations iii and vii remain partly implemented. With respect to Theme II – Transparency of Party Funding, recommendations ii and iii have been implemented satisfactorily. Recommendations iv, v, vi, vii and viii have been partly implemented, and recommendation i has not been implemented.

51. In so far as Theme I (Incriminations) is concerned, Azerbaijan has ratified the Protocol to the Criminal Law Convention on Corruption (ETS 191); however, further measures are required in order to comply with this instrument, notably to criminalise bribery involving arbitrators unequivocally in all relevant circumstances as detailed in the report. GRECO also urges the authorities to review the automatic – and mandatorily total – exemption from punishment granted to perpetrators of active bribery who report the matter before the act has come to the attention of the authorities and notes with interest that earlier proposals have been made to abolishing the mechanism of effective regret as a whole.

52. In relation to Theme II (Transparency of party funding), Azerbaijan has achieved some further progress: new legislation reforming the supervision of political financing by centralising the monitoring of the regular accounting of political parties together with that of the monitoring of election campaign financing under the Central Election Commission (CEC), which is also to ensure the publication of financial reports, are important steps. The provision of additional resources in the form of new staff to the CEC is to be welcomed. That said, it is regrettable that the CEC cannot be considered an independent body as it has a clearly partisan composition. The authorities are urged to ensure that the on-going reforms will guarantee an appropriate level of operational independence in this respect as required by Recommendation Rec(2003)4 on Common Rules against Corruption in the Funding of Political Parties and Electoral Campaigns. Moreover, measures have been taken to define donations and party fees and ceilings on donations have been introduced as well as to regulate various forms of party incomes. More needs to be done to ensure timely publication of financial reports submitted by parties to the CEC. GRECO also wishes to stress that several recommendations calling for stricter transparency rules were issued under the condition that small and insignificant parties were not to be unreasonably overburdened.

53. GRECO recalls that in view of the general concerns expressed in the Evaluation Report (paragraph 82) with regard to the overall political situation in Azerbaijan, marked by the lack of a truly pluralistic political landscape, GRECO had confined itself to issuing some basic recommendations which appeared essential and necessary for the establishment of a coherent system of transparency and which might pave the way for further necessary adjustments and improvements at a later stage. Azerbaijan needs to vigorously continue the reform process in order to further strengthen transparency of political financing and to foster the role of political

parties as a fundamental element of the democratic system and as an essential tool of expression of the political will of citizens.

54. Considering that only two of the eight recommendations concerning party financing have so far been fully implemented, GRECO, in accordance with Rule 31, paragraph 9 of its Rules of Procedure asks the Head of the delegation of Azerbaijan to submit additional information regarding the implementation of recommendations iii and vii (Theme I – Incriminations) and of recommendations i, and iv to viii (Theme II – Transparency of Party Funding), by 30 September 2016 at the latest.
55. Finally, GRECO invites the authorities of Azerbaijan to authorise, as soon as possible, the publication of the report, to translate the report into the national language and to make this translation public.