

Strasbourg, 22 November 2024

Greco(2024)21

98th GRECO Plenary Meeting
Strasbourg, 18-22 November 2024

DECISIONS

At its 98th Plenary Meeting (Strasbourg, 18-22 November 2024) which was chaired by Marin MRČELA (President of GRECO, Croatia)) and by Monika OLSSON (Vice-President of GRECO, Sweden) for part of the meeting, the Group of States against Corruption (GRECO):

1. noted the President's welcome message to newly nominated Heads of delegation and representatives, thanking them for their contribution to GRECO's work where their input and coordination at national level facilitate the results achieved by GRECO's monitoring, and for their expertise which is important in the mutual evaluation process during the examination of reports addressed to other member States;
2. noted the President's reminder that delegations are appointed on a permanent basis (Rule 3). Delegation members are the primary interlocutors for all communications. Only designated representatives attend plenary meetings. It is very important that changes to a delegation are promptly communicated by the Head of delegation to the Secretariat in order to keep the List of Representatives and corresponding mailing lists up to date;
3. adopted the agenda of the meeting;

Information

4. took note of the items discussed and decisions taken by the Bureau at its 106th meeting (Greco(2024)19);
5. took note of information provided as follows:

Marin MRČELA, President of GRECO

- the President expressed to the Slovak authorities, and in particular the Head of delegation in GRECO, Zuzana ŠTOFOVÁ, the deep appreciation of the delegation that had carried out the high-level mission to the Slovak Republic (26 September 2024) for its excellent organisation (cf. items 41 and 42 below);
- the President had participated in an [exchange of views with the Steering Committee on Democracy \(CDDEM\)](#) on 29 October 2024; it would be important for GRECO to remain attentive to the CDDEM's process of drawing up Parameters to facilitate the application and implementation of the [Reykjavik Principles for Democracy](#), to ensure that GRECO standards and findings are adequately reflected in that important Council of Europe policy text;
- the planned exchange of views between GRECO's President and the Venice Commission on the revision and update of the latter's Rule of Law Checklist would now take place in 2025; GRECO was one of the bodies to be invited to make a substantive contribution to that process, including in written form;
- the evaluation visits scheduled in 2024 had been completed: Fifth Round evaluation visits to Liechtenstein (April) and San Marino (June), Third Round evaluation visit to Kazakhstan (September), as well as the high-level mission to the Slovak Republic (September);
- the deposit by the Minister of Justice of Curaçao of the instruments accepting the territorial application of the Criminal Law Convention on Corruption (ETS 173) and its Additional Protocol (ETS 191) to Curaçao (entry into force in respect of Curaçao on 1 October 2024);

António DELICADO, member of the Bureau (Portugal)

- his contribution to the 9th edition of the African University on Youth and Development “#Fortheculture of Human Rights and the Rule of Law” organised by the North-South Centre of the Council of Europe (Cape Verde, 25-29 June 2024);

Panagiota VATIKALOU, member of the Bureau (Greece)

- her contribution to the conference [Aspects of Constitutionalism in European small-sized States](#) organised by the Ministry of Foreign Affairs of San Marino and the Venice Commission (San Marino, 14 October 2024);

Livia STOICA BECHT, Executive Secretary of GRECO

- the Secretariat’s participation to several awareness-raising events involving exchanges of views with experts from the capitals of GRECO member states, and in a roundtable on Political Finance and Political corruption organised by academia;
- the Secretariat’s contribution to numerous events since the last plenary, in particular those organised by global anti-corruption monitoring mechanisms (OECD ACN Monitoring plenary and Steering Group, September 2024; UNODC Second Resumed 15th Session of the Implementation Review Group, November 2024) and their secretariats (synergies meeting with UNODC, OECD and OAS to discuss civil society engagement);
- the Secretariat’s contribution to the meetings of the EU network against corruption (June and October 2024);
- the adoption by GRECO’s Statutory Committee on 9 October 2024 of the Scale of Contributions for 2025, of the adjustments to the Programme for 2024-2027 and the Budget of the Enlarged Agreement for 2025, as well as the decision of the Statutory Committee not to amend at this point of time Article 15 of the Appendix to Resolution (99)5 on the Statute of the Group of States against Corruption and to continue discussions on this point;
- the opening in the near future of two secondment opportunities in GRECO’s Secretariat for 2025 to support the implementation of the activities under the Sixth Evaluation Round;

Evaluation procedures

Fifth Round – Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies

6. adopted the Fifth Round Evaluation Reports on:

- **San Marino** (GrecoEval5Rep(2024)2)
- **Liechtenstein** (GrecoEval5Rep(2024)1)

and set the deadline of 31 May 2026 for the submission of situation reports on measures taken to implement GRECO’s recommendations;

7. noted with satisfaction that the authorities of San Marino authorise the publication of the report mentioned in decision 6 above;

8. invited the authorities of Liechtenstein to authorise, as soon as possible, the publication of the report mentioned in decision 6 above;

Sixth Round - Preventing corruption and promoting integrity at the sub-national level

9. approved the composition of the teams responsible for the Sixth Round Evaluations of Estonia, Luxembourg, the Slovak Republic, Slovenia and the United Kingdom (GrecoEval6(2024)2);

Compliance procedures

10. noted the President's call on all Heads of delegation to strictly respect the submission deadlines fixed by GRECO in each adopted report, as well as the deadlines for their comments on draft reports; this was essential to ensure the proper conduct of the compliance procedures;

Fourth Round – Corruption prevention in respect of members of parliament, judges and prosecutors

11. adopted the 3rd *Interim* Fourth Round Compliance Report on:

- **Austria** (GrecoRC4(2024)10)

and concluded that the level of compliance with the recommendations remains "**globally unsatisfactory**" in the meaning of Rule 31 revised, paragraph 8.3 of the Rules of Procedure;

12. pursuant to Rule 32, paragraph 2 (i) asked the Head of delegation to provide a report on progress in implementing the outstanding recommendations by 30 November 2025 at the latest;

13. pursuant to Rule 32, paragraph 2 (ii) a), invited the President of GRECO to send a letter to the Head of delegation – with a copy to the President of the Statutory Committee – on the need to take determined action with a view to achieving tangible progress as soon as possible;

14. adopted the 3rd *Interim* Fourth Round Compliance Report on:

- **Bosnia and Herzegovina** (GrecoRC4(2024)12)

and concluded that the level of compliance with the recommendations remains "**globally unsatisfactory**" in the meaning of Rule 31 revised, paragraph 8.3 of the Rules of Procedure;

15. pursuant to Rule 32, paragraph 2 (i) asked the Head of delegation to provide a report on progress in implementing the outstanding recommendations by 30 November 2025 at the latest;

16. in accordance with Rule 32 revised, paragraph 2 (ii) c), invited the Secretary General of the Council of Europe to send a letter to the Minister of Foreign Affairs of Bosnia and Herzegovina - with a copy to the Head of delegation – on the need for determined action to be taken with a view to achieving tangible progress as soon as possible;

17. adopted the 3rd *Interim* Fourth Round Compliance Report on:

- **Czechia** (GrecoRC4(2024)18)

and decided not to continue applying Rule 32 in the case of this member;

18. pursuant to Rule 31 revised, paragraph 8.2 asked the Head of delegation to submit additional information on action taken to implement certain recommendations by 30 November 2025;
19. adopted the 3rd *Interim* Fourth Round Compliance Report on:
 - the **Republic of Moldova** (GrecoRC4(2024)13)and closed the Fourth Round compliance procedure in respect of this member;
20. adopted the 3rd *Interim* Fourth Round Compliance Report - including follow-up to the Ad hoc (Rule 34) on:
 - **Poland** (GrecoRC4(2024)9)and concluded that the level of compliance with the recommendations remains "**globally unsatisfactory**" in the meaning of Rule 31 revised, paragraph 8.3 of the Rules of Procedure;
21. pursuant to Rule 32, paragraph 2 (i) asked the Head of delegation to provide a report on progress in implementing the outstanding recommendations by 30 November 2025 at the latest;
22. in accordance with Rule 32 revised, paragraph 2 (ii) c), invited the Secretary General of the Council of Europe to send a letter to the Minister of Foreign Affairs of Poland - with a copy to the Head of delegation – on the need for determined action to be taken with a view to achieving tangible progress as soon as possible;
23. considered that the importance of complying with the Fourth round and Rule 34 recommendations should also be emphasised on the occasion of the high-level mission to Poland that would be carried out pursuant to the decisions taken at the 95th Plenary Meeting in the framework of the Fifth Round compliance procedures;
24. adopted the 4th *Interim* Fourth Round Compliance Report on:
 - **Denmark** (GrecoRC4(2024)19)and concluded that the level of compliance with the recommendations remains "**globally unsatisfactory**" in the meaning of Rule 31 revised, paragraph 8.3 of the Rules of Procedure;
25. pursuant to Rule 32, paragraph 2 (i) asked the Head of delegation to provide a report on progress in implementing the outstanding recommendations by 30 November 2025 at the latest;
26. in accordance with Rule 32 revised, paragraph 2 (ii) c), invited the Secretary General of the Council of Europe to send a letter to the Minister of Foreign Affairs of Denmark - with a copy to the Head of delegation – on the need for determined action to be taken with a view to achieving tangible progress as soon as possible;
27. considered that the importance of complying with the Fourth Round recommendations should also be emphasised on the occasion of the high-level mission to Denmark that would be carried out pursuant to the decisions taken at the 95th Plenary Meeting in the framework of the Fifth Round compliance procedures;

28. adopted the 5th *Interim* Fourth Round Compliance Report on:

- **Türkiye** (GrecoRC4(2024)17)

and concluded that the level of compliance with the recommendations remains “**globally unsatisfactory**” in the meaning of Rule 31 revised, paragraph 8.3 of the Rules of Procedure;

29. pursuant to Rule 32, paragraph 2 (i) asked the Head of delegation to provide a report on progress in implementing the outstanding recommendations by 30 November 2025 at the latest;

30. recalled that a high-level mission to Türkiye would be carried out in 2025 according to the decision taken at the 94th Plenary Meeting in the framework of the Fourth Round compliance procedures;

31. noted with satisfaction that the authorities of the Republic of Moldova authorise the publication of the report mentioned in decision 19 above;

32. invited the authorities of Austria, Bosnia and Herzegovina, Czechia, Poland, Denmark and Türkiye to authorise, as soon as possible, the publication of the reports mentioned in decisions 11, 14, 17, 20, 24, and 28, above;

33. adopted the 2nd Fourth Round Compliance report on:

- **Hungary** (GrecoRC4(2024)14)

and pursuant to Rule 31 revised, paragraph 9, asked the Head of delegation to submit additional information on the implementation of certain recommendations by 30 November 2025;

34. adopted the Addenda to the 2nd Fourth Round Compliance Reports on:

- **Andorra** (GrecoRC4(2024)16)
- **Armenia** (GrecoRC4(2024)11)

and closed the Fourth Round compliance procedure in respect of both members;

35. adopted the Addendum to the 2nd Fourth Round Compliance Report on:

- **Ukraine** (GrecoRC4(2024)10)

and pursuant to Rule 31 revised, paragraph 9, asked the Head of delegation to submit additional information on the implementation of certain recommendations by 30 November 2025;

36. thanking the Head of delegation of Ukraine for his strong commitment and for being present in Strasbourg, GRECO commended Ukraine for the progress reported and appreciated the timely submission of information despite the extremely difficult circumstances of the Russian Federation’s ongoing war of aggression, under which the country continues to function under martial law and hence has to adjust its priorities;

37. noted with satisfaction that the authorities of Andorra authorise the publication of the report mentioned in decision 34 above;

38. invited the authorities of Hungary, Armenia and Ukraine to authorise, as soon as possible, the publication of the reports mentioned in decisions 33, 34 and 35 above;

Fifth Round – Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies

39. adopted, in the framework of Rule 31 revised bis, the Fifth Round Compliance Reports on:

- **Austria** (GrecoRC5(2024)15)
- **Bosnia and Herzegovina** (GrecoRC5(2024)13)
- **Bulgaria** (GrecoRC5(2024)14)

and noted that further progress was necessary to achieve an adequate level of compliance within the next 18 months, and set the deadline of 31 May 2026 for the submission by the respective Heads of delegation of a situation report on additional measures taken to implement the Fifth Round recommendations;

40. invited the authorities of Austria, Bosnia and Herzegovina and Bulgaria to authorise, as soon as possible, the publication of the reports mentioned in decision 39 above;
41. took note of the information provided concerning the [high-level mission](#) to the **Slovak Republic** (26 September 2024) carried out pursuant to Rule 32 revised, paragraph 2 (iii) and led by GRECO's President;
42. welcomed the reassurances received of the commitment of the authorities of the Slovak Republic at the highest level to implement the outstanding recommendations issued by GRECO in the Fifth Evaluation Round;

Rule 34 – Ad hoc procedure in exceptional circumstances

43. discussed a proposal drawn up by the Secretariat at the request of the Bureau taking into account information provided by the Slovak delegation (Greco(2024)4-rev) and decided to initiate, pursuant to Rule 34, an ad hoc procedure in respect of the **Slovak Republic**;
44. asked the Head of delegation of the Slovak Republic to submit, by 15 January 2025, detailed , official information relevant for the preparation of an *ad hoc* report to be examined by GRECO at its 100th Plenary Meeting (3-6 June 2025);
45. instructed the Secretariat to nominate rapporteurs for the above procedure in respect of Slovak Republic;

Engagement with Civil Society

46. discussed the Bureau's proposals to further improve GRECO's engagement with civil society (Greco(2024)20); agreed that Bureau 108 would report to the 99th Plenary meeting (17-19 March 2025), after consideration of additional proposals by delegations - to be submitted to the Secretariat by 20 December 2024 – and agreed to reexamine these proposals, with a view to their adoption;

Programme of Activities 2025

47. adopted its Programme of Activities for 2025 (Greco(2024)18-fin) which outlines the main objectives and actions for GRECO's core monitoring work, as well as its institutional role and the contacts and synergies that it pursues;
48. noted the need to maintain some degree of flexibility in the planning to respond to scheduling requirements that could not be anticipated at this stage, and that if the examination of compliance reports needed to be postponed to ensure feasible agendas for plenary meetings, the Secretariat would communicate appropriate new deadlines for situation reports to the members concerned;

Exchange of views – Secretary General of the Congress of Local and Regional Authorities of the Council of Europe

49. welcomed this exchange with Congress Secretary General Matthieu MORI, his insights and the prospect of opportunities for cooperation and synergies to maximise the impact of GRECO's findings in the framework of its new evaluation Round on Preventing corruption and promoting integrity at the sub-national level;

Elections for the Sixth Evaluation Round (mandates from 1 January 2025)

50. elected, by secret ballot, David MEYER (United Kingdom) to the presidency of GRECO;
51. elected, by secret ballot, António DELICADO (Portugal) to the vice-presidency of GRECO;
52. elected, by secret ballot, the following representatives to sit on the Bureau (English alphabetical order of countries):
 - Alexia KALISPERA (Cyprus)
 - Lise CHIPAULT (France)
 - Panagiota VATIKALOU (Greece)
 - Sorin TĂNASE (Romania)
 - Olivier GONIN (Switzerland);

Topical anti-corruption developments/events in member States (Item 4)

53. took note of information provided at the request of the Bureau by the Delegations of Georgia,¹ Italy,² Poland,³ the Netherlands⁴ and the Slovak Republic⁵ as well as the information provided by Spain⁶;

¹ About the decision dated 24 September 2024 of the Anti-Corruption Bureau's designating "Transparency International - Georgia" and its executive director as entities with "declared electoral goals", and the later withdrawal of this decision.

² On changes to the Criminal Code regarding the offences of abuse of office and trading in influence.

³ On the possible dismantling of the Central Anti-Corruption Bureau (CBA) and planned legislative and institutional measures.

⁴ On current practice regarding the categories of assets and interests to be declared by members of Parliament.

⁵ On the recently adopted legislation introducing amendments to the Criminal Code and the Code of Criminal Procedure, on the Constitutional Court's interim decision (PL. ÚS 3/2024) suspending the effectiveness of some of the adopted amendments and on the suppression of the Office of the Special Prosecution which became effective on 20 March 2024.

⁶ About the renewal of the General Council of the Judiciary (CGPJ) and the planned reform of the relevant legal framework.

Information from observer organisations and Council of Europe bodies

54. welcomed with interest the information provided by the representative of UNODC concerning the ratification and review of progress in the framework of the Implementation Review Mechanism of the UN Convention against Corruption, the discussions on the second phase of the Mechanism and the outcomes of the 10th session of the Conference of the States Parties of December 2023;
55. welcomed with interest the information provided by the representative of the European Union on the fifth edition of the Rule of Law Report, on the recently published study High risk areas of corruption in EU member states: a mapping and in-depth analysis and the outcomes of the meetings of the EU Anti-Corruption Network;

Publication of Reports⁷

56. called on the authorities of the member States concerned to authorise without further delay and in line with the long-standing practice the publication of reports previously adopted by GRECO⁸ while noting that the President particularly urged the following delegations to authorise publication rapidly: Azerbaijan (report from March 2023), Denmark, Spain and Türkiye (reports from December 2023);

Award of the Pro Merito Medal

57. in recognition of Marin MRČELA's commitment to the Council of Europe's values and work, and notably his valuable contribution to GRECO, the Pro Merito Medal of the Council of Europe, a distinction granted by the Secretary General was presented to him by Gianluca ESPOSITO, Director General of Human Rights and Rule of Law;

Any other business

58. in view of the Training session that would be organised on 20-21 March 2025, encouraged the delegations that had not already done so to inform the Secretariat promptly of their list of Evaluators appointed for the Sixth Evaluation Round;
59. took note that all Heads of Delegation would receive a communication in the coming week asking them to designate by **16 December 2024** up to three Evaluators from their list who will participate in the Training session (one covered by GRECO's budget, and two participating at the expense of the national authorities);
60. noted that for the 2024 General Activity Report (which would be on the agenda of the March 2025 Plenary Meeting), only the compliance reports published by **13 December 2024** would be taken into account in the statistics on compliance levels in the Fourth and Fifth Rounds; the cut-off date for informing the Secretariat of any publications still to take place in 2024 is **6 December 2024**;

⁷ *Action to be taken when publishing adopted reports* (decision 26, GRECO 58):

- agree a same-day publication date with the Secretariat
- clearly mark both the date of adoption and date of publication on the cover page
- make the national language version available and easily accessible on a domestic website
- notify the Secretariat of the location of the report by communicating the internet link to it
- include a link on the domestic website to the official language versions on GRECO's website.

⁸ **Adopted in March 2023:** Fifth Round Evaluation Report on Azerbaijan; **adopted in December 2023:** Fifth Round Evaluation Report on Türkiye, 2nd Fifth Round Compliance Reports on Denmark and Spain; **adopted in June 2024:** Fifth Round Compliance Report on Hungary, 2nd Fifth Round Compliance Report on Slovenia, 2nd Addendum to the 2nd Fourth Round Compliance Report on Spain.

61. thanked warmly Monika OLSSON (Head of delegation and Vice-President – Sweden) for her distinguished service to GRECO and wished her a long and happy retirement;

Future meetings

62. took note of the following dates:

- **107th Bureau Meeting:** the date of the meeting will be agreed by the newly elected Bureau
- **99th Plenary Meeting and Training for 6th Round Evaluators:** Strasbourg, 17-19 March 2025 (Plenary) and 20-21 March 2025 (Training) – **in person only**
- **100th Plenary Meeting:** Strasbourg, Tuesday 3 June – Friday 6 June 2025 (midday) – **in person only**
- **101st Plenary Meeting:** Strasbourg, Tuesday 18 November – Friday 21 November 2025 (midday) – **in person only.**