

ECONOMIC CRIME AND COOPERATION DIVISION

Action against Economic Crime

Cooperation Highlights 2018



COUNCIL OF EUROPE



CONSEIL DE L'EUROPE

ECCD

Action Against Economic Crime

COOPERATION HIGHLIGHTS 2018

27

Jurisdictions

3

Regional Programmes

5600 Beneficiaries

Government ministries, law enforcement, financial intelligence units, prosecutors, the judiciary, and others.

210

Activities

6 Key Areas

Anti-corruption

Anti-money laundering

Counter terrorist financing

International cooperation and MLA

Asset recovery and management

Targeted financial sanctions

Impact & Progress

92

MONEYVAL / GRECO Recommendations Addressed

27

Legislative instruments supported

35

Sectorial Policies Influenced

English edition

Published by the Council of Europe

F-67075 Strasbourg Cedex

www.coe.int

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Pictures @ Council of Europe

Layout and cover design: Council of Europe

Printed by Economic Crime and Cooperation Division

F-67075 Strasbourg Cedex

Circulation: 100 copies

The opinions expressed in this work are the responsibility of the author(s) and do not necessarily reflect the official policy of the Council of Europe. All correspondence concerning this document should be addressed to Economic Crime and Cooperation Division

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ABBREVIATIONS

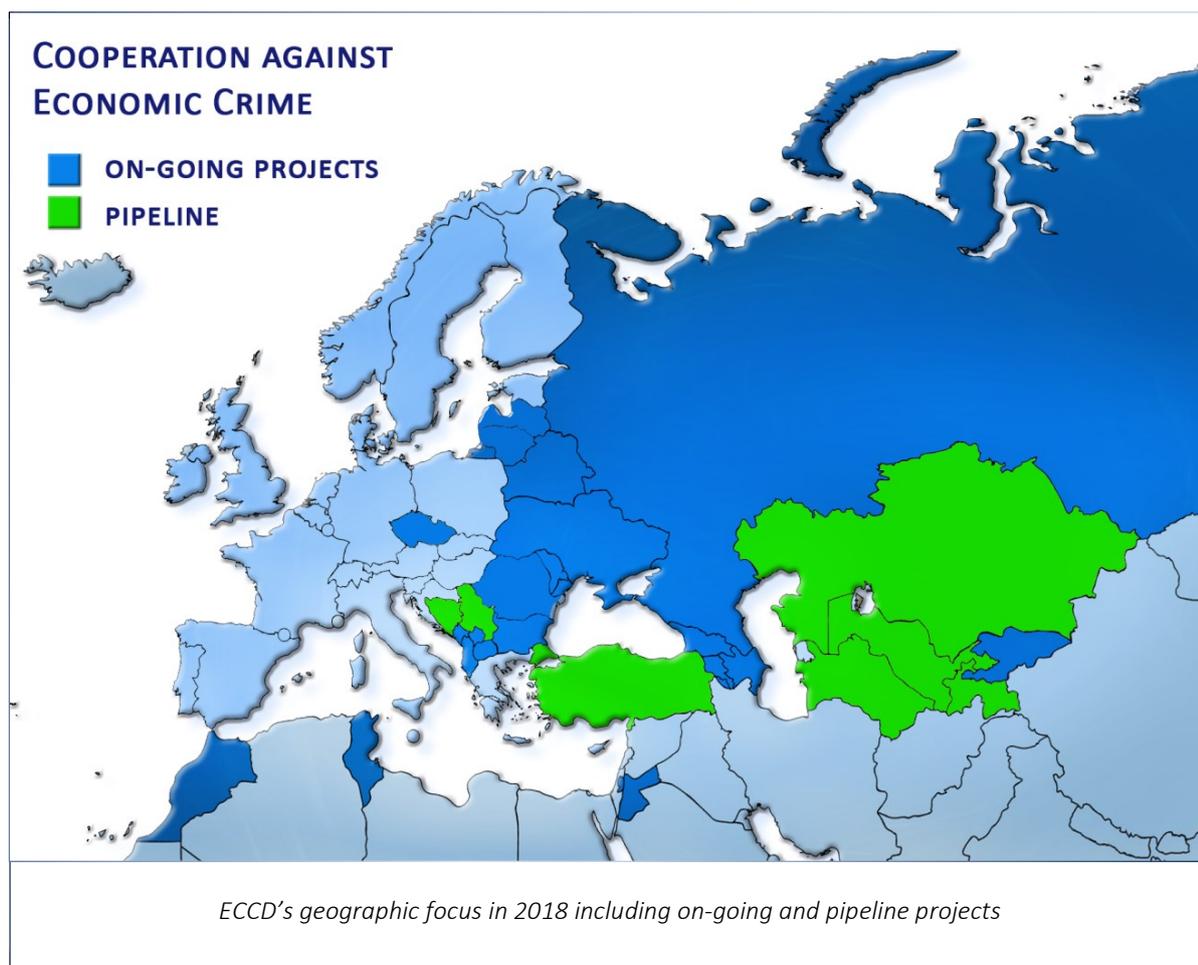
| | |
|-------------------|---|
| AFSA | Albanian Financial Supervisory Authority |
| AML | Anti-Money Laundering |
| AML/CFT | Anti-Money Laundering and Countering Financing of Terrorism |
| APC | Agency for Prevention of Corruption (Montenegro) |
| CCC | Commission on Combating Corruption (Azerbaijan) |
| CLEP | Controlling corruption through law enforcement and prevention in the Republic of Moldova |
| CoE | Council of Europe |
| DGSN | General Directorate of National Security (Morocco) |
| ECCD | Council of Europe' Economic Crime and Cooperation Division |
| EEA | European Economic Area |
| EU | European Union |
| EUD | European Union Delegation |
| EUROPOL | European Police Office |
| GRECO | Council of Europe's Group of States against Corruption |
| HF | EU-CoE Horizontal Facility for Western Balkans and Turkey |
| HIDAACI | High Inspectorate for Declaration and Audit of Assets and Conflict of Interest |
| INLUCC | <i>Instance Nationale de Lutte Contre la Corruption</i> (Anti-corruption authority, Tunisia) |
| JIACC | Jordanian Integrity and Anti-corruption Commission (Jordan) |
| MONEYVAL | Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (Council of Europe) |
| NG | Norway Grants |
| NRA | National Risk Assessment |
| NSJ | National School of Judges (Ukraine) |
| OECD | Organisation for Economic Cooperation and Development |
| PECK II | Project against Economic Crime in Kosovo* |
| PGG | Partnership for Good Governance (Eastern Partnership Countries) |
| PRECOP II | Protection of the Rights of Entrepreneurs in the Russian Federation from Corrupt Practices |
| SAI | State Audit Institution (SAI) |
| SAPSI/ASAN | Azerbaijani State Agency for Public Service and Social Innovations |
| SEC | State Examination Centre (Azerbaijan) |
| SNAC 2 | South Neighbourhood Anti-Corruption Project |
| SPCC-KY | Strengthen Prevention and Combating of Corruption in Kyrgyz Republic |
| SSP | Supreme State Prosecutor (Montenegro) |

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1 SUMMARY

More than 5,600 participants from 26 countries and jurisdictions benefited from 188 tailor-made cooperation activities organised and implemented by the Economic Crime and Cooperation Division (ECCD) in 2018. These activities supported specific reforms covering a wide spectrum of topics and sectors. The primary aim of such activities is to enhance measures to combat corruption, money laundering, terrorist financing, and promote asset recovery and international cooperation, including mutual legal assistance in criminal matters.



A total of 16 countries and jurisdictions benefitted from cooperation through three regional programmes: Eastern Europe (EU/CoE Partnership for Good Governance), South-Eastern Europe (EU/CoE Horizontal Facility for the Western Balkans and Turkey) and the Middle East & North Africa (EU/CoE South Neighbourhood Programme). Ten other countries and jurisdictions were part of cooperation through country-specific interventions. The programmatic partnership between the Council of Europe and the Norway Grants (NG) continued with the launching of new areas of cooperation in Latvia and Lithuania under the new 2014-2021 financing cycle, in addition to the on-going cooperation with Romania, Czech Republic and Bulgaria.

The Division's actions and activities within the beneficiary member States has led to a number of concrete results. At a glance, the ECCD contributed to the development of 26 sectorial policies, influenced 28 legislative processes, supported the implementation of 58 recommendations from Council of Europe's monitoring bodies (GRECO and MONEYVAL), and provided several multi-disciplinary trainings.

Specific actions at the national or jurisdictional level influenced a number of legislative, policy and institutional processes, such as in:

- **Albania**, by providing recommendations and advising on the “Law on organisation and functioning of the Agency for the Administration of Seized and Confiscated Asset”;
- **Azerbaijan**, by advising and reviewing the draft law on “Regulations of Ethical Conduct of members of Parliament”, as well as five pieces of legislation on “Fit and Proper” Standards (Law on Banks, Law on Non-Bank Credit Institutions, Law on Insurance Activity, Law on Securities Market, and Law on Investment Funds);
- **Georgia**, where the Action provided technical assistance to the national risk assessment and advised on updates to the draft “Law on Prevention of Money Laundering and Terrorist Financing”;
- **Republic of Moldova**, by contributing to the development of a national AML/CFT strategy, providing legal expertise on the draft Law on AML/CFT sanctions and sanctioning procedures, and policy advising on strategic plans for the Asset Recovery Office and the National Integrity Authority;
- **Montenegro**, by supporting development of two new laws: the Law on International Restrictive Measures; and the Law on Prevention of Money Laundering and Terrorist Financing (both adopted in July 2018), while supporting Montenegrin authorities to comply with the required conditions which led to the country's removal from the Compliance Enhancing Procedures of MONEYVAL in December 2018;
- **Kosovo**^{*}, by providing legal expertise on the drafting of the new Law on Whistleblowers; selected provisions of the new Criminal Code (corruption, terrorism, and terrorism financing offences); and the draft Law on Implementation of International Sanctions related to terrorist financing and proliferation (which is still on-going);
- **Kyrgyzstan**, by advising and reviewing the draft Law on Whistleblowers, and developing and implementing a comprehensive Methodology on Measuring Corruption Risks for Kyrgyz officials;
- **Russian Federation**, by policy and technical advising the development of the draft law on State Control (supervision) and Municipal;
- **North Macedonia**, where the support on the establishment of an Asset Recovery Office was initiated through the development of the Roadmap assisting the authorities in the process;
- **Ukraine**, improving the capacity of judges to adjudicate corruption offences through provision of sustainable training programmes and curricula for the National School of Judges.

* All references to Kosovo, whether to the territory, institutions or population, in this text shall be understood in full compliance with United Nations Security Council Resolution 1244 and without prejudice to the status of Kosovo.



COUNTERING THREATS TO THE RULE OF LAW:

COUNCIL OF EUROPE

ORDINARY BUDGET ACTIVITIES

2 ORDINARY BUDGET ACTIVITIES

2.1 Economic Crime Initiative

The Council of Europe's Action against Economic Crime and Cooperation Division organised a Conference on stock taking in Strasbourg (15-16 February 2018). The event brought together more than 40 Council of Europe experts from academia, policy community and practitioners along with the Council of Europe's Secretariat from relevant specialised services, committees and monitoring structures to discuss and identify issues, challenges and possible solutions in implementing CoE standards applied against Economic Crime through cooperation activities and other possible actions.



*Conference on "Activities against Economic Crime: tools, impact and lessons learnt"
Strasbourg, France 15-16 February 2018*

The aim of the Conference was to identify and prioritise those economic crime-related components that continue to be challenging on the practical and implementation level, while seeking to improve cooperation on technical matters and ensure long-term impact. Three major themes were tackled during the discussions:

- 1) Corruption and Good governance (enforcement and prevention);
- 2) Money Laundering and Terrorist Financing; and
- 3) Criminal Assets and International Cooperation.

The discussions of the plenary and workshop sessions in the area of anti-corruption and good governance focused on both general issues and questions surrounding the anti-corruption engagement of the CoE, as well as a number of specific policy issues: that is, acknowledging the need for putting more emphasis on efficient enforcement of existing anti-corruption legislation and international standards. Recommendations from various monitoring bodies and interventions implemented through technical assistance clearly show that while in most countries anti-corruption

legislation is largely in place and quite robust, what is missing is its efficient implementation in practice and evidence of impact.

The Initiative identified a list of patterns and sectors applicable to each theme where the Council of Europe’s work could be addressing at a four-level consolidated approach through: 1) development of new standards, including recommendations and “required good practice standards”; 2) re-enforced monitoring processes; 3) sectoral approach to technical assistance and cooperation, grounded in country-specific assessment of needs and corresponding solutions; and 4) political dialogue and pressure.

2.2 National Risk Assessment Project in Bulgaria (NRA-Bulgaria)



*NRA drafting meeting
25 April 2018, Sofia, Bulgaria*

In 2018, the ECCD continued the implementation of the Project funded by the Council of Europe to assist the Bulgarian authorities to carry out a National Risk Assessment (NRA) in the field of money laundering and terrorism financing.

The NRA was piloted based on a new NRA Methodology developed by the Council of Europe. The Council of Europe provided guidance support and quality control in the implementation of the Methodology and the drafting of the NRA Report by Bulgarian authorities.

It is expected that the advice provided by the ECCD will contribute to the finalisation of the

NRA report by Bulgarian authorities in the course of 2019.

2.3 International Conference on Beneficial Ownership

The Economic Crime and Cooperation Division organised an International Conference on “Transparency of beneficial ownership” on 30-31 October 2018 in Tirana, Albania. The event was jointly funded by the ordinary budget of the Council of Europe and two major EU/CoE programmes, the “Partnership for Good Governance” (PGG) and the “Horizontal Facility for Western Balkans and Turkey” (HF).

The initiative for organizing such conference stems from the Council of Europe’s efforts aimed at strengthening capacities of anti-money laundering and countering the financing of terrorism (AML/CFT) in South East Europe (SEE) and Eastern Partnership (EaP) countries.

The aim of the conference was to develop a common understanding of international standards and comparative practices related to transparency of beneficial ownership among practitioners and policy makers in the two regions, consider future steps for ensuring compliance with international standards and to help map-out the process of developing the beneficial ownership registries.

Conference expected results:

1. Increase awareness of senior policy makers on international and European standards regarding transparency of beneficial ownership;
2. Share practices, challenges and practical information when introducing compliance and registries as well as international cooperation on these matters; and
3. Map out next steps for developing and implementing transparency of beneficial ownership solutions in South-East Europe and Eastern Partnership regions.

Representatives from nineteen (19) jurisdictions* from SEE and EaP jurisdictions, as well as representatives from EU countries and the European Commission attended and discussed good practices for addressing misuse of legal entities and arrangements.

The participants discussed the challenges in implementing FATF Recommendations 24 and 25, including the increasing need to demonstrate effective enforcement, the revised guidance regarding beneficial ownership registries coming out of the European Union, as well as implementation challenges faced by EU member states.

Experts from state agencies and private sector entities from Belgium, Germany, Ireland, and Jersey presented efforts made in recent years by their respective jurisdictions and private sector entities to meet the FATF and EU requirements. Discussions highlighted challenges with understanding true



*Expert panel at the International Conference on “Transparency of beneficial ownership”
Tirana, Albania 30-31 October 2018*

* Participating jurisdictions: Albania, Armenia, Azerbaijan, Belarus, Belgium, Bosnia and Herzegovina, Croatia, Germany, Georgia, Ireland, Jersey, Kosovo*, Montenegro, Republic of Moldova, Serbia, “The former Yugoslav Republic of Macedonia” (As of 12 February 2019, the official name of the country changed to North Macedonia), Turkey, United Kingdom, Ukraine, and the European Union.

ownership and control structures and the use of props, such as company ownership charts, to facilitate the process of identification of owners

.Subsequently the Council of Europe has received requests to support the authorities in Albania in developing a country specific roadmap for the establishment of a Beneficial Ownership registry, while the authorities in the Republic of North Macedonia are already progressing towards making such registry operational.

2.4 Cooperation activities on ethics, integrity and conflict of interest presented to the European Committee on Democracy and Governance (CDDG)

The Economic Crime and Cooperation Division (ECCD) presented its efforts towards strengthening ethics and integrity in the public and the private sector to the Working Group on Public Ethics of the European Committee on Democracy and Governance (CDDG).

The presentation demonstrated the efforts taken in jurisdictions such as Albania, Republic of Moldova, Montenegro, Serbia, Turkey, Ukraine etc., which led to improvement of regulatory and oversight structures. Furthermore project interventions have supported the development of codes of ethics and codes of conduct for members of parliament, judges, prosecutors and other categories of public servants, which were subsequently adopted by the respective authorities.

In addition the ECCD has already developed a set of resources which are available to countries benefiting from project interventions, these include:

- Legislative Toolkit on Conflict of Interest;
- Legislative Toolkit on Integrity Testing
- Legislative Toolkit on Lobbying

In conclusion it was noted that despite the positive steps and progress challenges remain, such as the need for stronger ethical and conduct standards, regulation on incompatibility of functions, and general weaknesses of oversight and enforcement mechanisms identified both among and beyond Council of Europe member states.

2.5 ECCD presents its activities against corruption and money laundering in EaP countries in the 7th ordinary session of EURONEST*

At the invitation of the EURONEST Secretariat of the European Parliament, the Economic Crime and Cooperation Division had the opportunity to participate at a debate on cooperation activities in the fight against corruption and money laundering in the Eastern Partnership (EaP) countries under a dedicated panel session, namely “Combatting Money Laundering and Corruption”.

* The Euronest Parliamentary Assembly is the inter-parliamentary forum in which members of the European Parliament and the national parliaments of Ukraine, Moldova, Armenia, Azerbaijan and Georgia[1] participate and forge closer political and economic ties with the European Union.[2][3] It was established in 2011 by the European Commission as a component of the Eastern Partnership.

At the panel, ECCD presented the approach of the Council of Europe in the fight against Economic Crime, by providing a general background with references to the CoE standards in the fight against corruption, money laundering/terrorist financing and standards on international cooperation in criminal matters; in addition the presentation provided information on the work of the CoE Monitoring Bodies (GRECO and MONEYVAL) and the approach the Economic Crime and Cooperation Division (ECCD) takes in supporting implementation of specific reforms that address certain monitoring bodies recommendations. Furthermore the presentation included information on the progress and results achieved in so far under the Partnership for Good Governance (PGG) projects in the EaP countries including examples of pertaining legislative and policy reforms and the level of progress in institutional capacity building in the fight against economic crime.

Some of the key issues highlighted by the MEPs during the session included the need to strengthen investigations and prosecution of corruption and money-laundering cases in EaP countries. Speakers noted that despite the numerous and latest scandals such as “Azerbaijani Laundromat”, “Russia Laundromat” and “the Moldova bank fraud” very little evidence shows results that those responsible have faced prosecution or have been held accountable in connection with these money laundering cases. In view of the above it was noted that there is need for an increased Transparency of Beneficial Ownership (TBO) of companies, trusts and other legal arrangements which is linked with the requirements for Transparency of Beneficial Ownership and Registries of Beneficial Ownership set in the 4th and 5th EU AML Directives.

Partnership for Good Governance



REGIONAL COOPERATION PROGRAMMES
EU/COE PARTNERSHIP FOR GOOD GOVERNANCE
(PGG)



3 EU/CoE PARTNERSHIP FOR GOOD GOVERNANCE (PGG)

The year 2018 marked the completion of the first phase of the joint European Union and Council of Europe Partnership for Good Governance (PGG) programme for the Eastern Partnership (EaP) countries of Armenia, Azerbaijan, Belarus, Georgia, Republic Moldova and Ukraine.

Bi-laterally, building upon already results from previous years, the ECCD supported the authorities in Azerbaijan and Georgia to enhance anti-money laundering regulations and institutions and in Ukraine to build judges' subject matter knowledge and skills to be applied in economic crime cases. At the same time, by promoting coherent understanding and effective implementation of anti-corruption and anti-money laundering standards, the PGG regional project provided a springboard for addressing common challenges across the EaP region in a cost-effective way, while increasing the share and networking of information and possible solutions.

3.1 PGG regional project

The PGG regional project through its intervention addressed needs in all EaP countries thus providing a plain level field to all countries. Through the project, senior policy makers increased their understanding on effective implementation of standards and acquired knowledge on potential solutions to ensure beneficial ownership transparency in their countries. Likewise, in an effort to improve and enhance existing anti-money laundering supervisory systems for non-financial sectors, the PGG regional project provided the competent authorities with training and guidance on establishing risk-based anti-money laundering supervisory framework.



“It is necessary to mention that the actuality of the issues addressed [at the regional workshop] was an added value for the specific activity of the Service, including the supervision activity and the trends in the field, being combined with the practical aspects of the experience of the experts from other countries.”

- Office for Prevention and Fight against Money Laundering, Republic of Moldova | [Link](#)

Responding to the significant challenges to investigation and prosecution of illicit enrichment and confiscation of illicit proceeds across the EaP region, the PGG regional project provided policy-makers, representatives of prosecution authorities and financial intelligence units with guidance on effective investigation, prosecution and subsequent confiscation of illicit gains, and ways to target illicit enrichment. Additionally, the representatives of anti-corruption bodies increased understanding about the common integrity issues and the objectives of the internal control system in order to develop practical instruments within their institutions. Lastly, a review of anti-corruption bodies' effectiveness generated a number of recommendations for the institutions, in addition to setting up ground for future programming.



*Regional Workshop on “AML/CFT risk based approach to Supervision of DNFPBs”
Istanbul, Turkey, 22-23 November 2018*

3.2 PGG-Azerbaijan

In 2018, the ECCD responded to the needs of Azerbaijan authorities in the area of the fight against money laundering and terrorist financing, by first of all shifting the focus of the project from anti-corruption measures to prevention of anti-money laundering.

In Azerbaijan, the PGG project developed further capacities of the law enforcement, judiciary and other relevant state institutions in investigating and processing money-laundering and terrorism financing through tailored training courses and development of a training toolkit.

Furthermore, a risk assessment methodology was produced in order to help relevant supervisory authorities to carry out an effective supervision to counteract money laundering and terrorist



*Steering Committee Meeting of the Project on
“Strengthening Anti-Money Laundering in Azerbaijan”
Baku, Azerbaijan, 5 February 2018*

financing. Additional sector-specific guidelines were developed for financial institutions to enhance their capacities to implement risk appropriate anti-money laundering controls.

The Project contributed to the legislative reforms by carrying out two legal reviews. First review assessed the compliance of the national legislation with international standards in view of implementing outstanding MONEYVAL recommendations in relation to “fit and proper” standards. The AML/CFT Law was amended accordingly on 12 October 2018 by extending the “fit and proper” requirements to those who are “associates” to criminals. The legislative amendment reflecting the recommendations of the legal review, as well as relevant capacity building activities implemented under the Project contributed to the positive assessment of Azerbaijan’s anti-money laundering system at the latest MONEYVAL plenary meeting.

The second legal review concerned the draft amendments to the Law on Regulations of Ethical Conduct of Members of Parliament of the Republic of Azerbaijan. The amendments were adopted on 18 December 2018 and incorporated the Project’s recommendation in relation to conflict of interest. In addition, the Project developed a guidance paper for Members of Parliament on conflict of interest including practical examples of acceptance of gifts, post-employment rules and contact with third parties. The Disciplinary Commission of the Parliament has started to use the guidance as a reference list for deputies to check for relevant solutions to potential conflict of interest situations.



“Any support is good when it is in time and meets exact needs. The trainings, arranged by the CoE to the supervised entities and the risk assessment methodology in the banking sector prepared specifically for Financial Market Supervisory Authority (FIMSA) absolutely matches those two criteria. On the one hand, the CoE’s support was done just in the process of FIMSA’s risk assessment activities, on the other hand, such support made it possible to reveal matters, which should be further developed by FIMSA.”

- Financial Market Supervisory Authority of Azerbaijan Republic

3.3 PGG-Georgia

In Georgia, the PGG Project continued to play significant role in domestic legislative reforms and institutional capacity development to reinforce preventive and law enforcement measures against money laundering and terrorist financing.

At legislative and policy levels, the ECCD’s technical assistance brought Georgia’s Draft Law on “Facilitating the prevention of money laundering and terrorist financing” closer to the international standards. The PGG Project continued to provide advice to national authorities towards development of the country’s Anti-Money Laundering and Countering Financing of Terrorism National Risk Assessment. Both actions are critical in



*Georgian financial institutions discuss money laundering and terrorist financing risks associated with new payment methods and solutions.
Tbilisi, 15-16 November 2018*

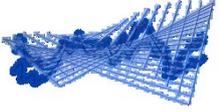
developing the new national strategy and action plan on anti-money laundering and counter terrorist financing and in view of the MONEYVAL's mutual evaluation of Georgia in 2020.

Going beyond legislative and policy measures, the ECCD's technical assistance continued raising preventive and enforcement capacities. Specialised trainings addressed to criminal justice system enhanced professional capacities for effective investigation and prosecution of money laundering and terrorist financing, and recovery of criminal assets. Technical assistance to law enforcement extended

also to tackling corporate crimes, whereby impact of tailored trainings was reinforced by providing bespoke guidance on corporate liability. As a result of continued support in this area, the authorities have made significant progress in implementing OECD Istanbul Anti-Corruption Action Plan Recommendation related to liability of legal persons.

Preventive actions targeted the risk of financial institutions, legal professionals, accountants, auditors, and insurance sector being misused for laundering illegal proceeds or for the purpose of financing terrorism. Representatives of financial institutions, non-financial businesses and

professions and their competent supervisory authorities (e.g. Bar Association, National Bank of Georgia, etc.) are better placed to counter money laundering and terrorist financing risks thanks to enhanced awareness about their obligations. The sustainability of these initiatives is ensured through training modules and a pool of 10 national trainers from the legal profession capable of replicating sector specific trainings.



“ PGG-Georgia Project helped lay the groundwork for making the fight against money laundering and terrorism financing in Georgia more targeted and effective.

Its technical assistance to the national risk assessment process that aims to identify threats and systemic vulnerabilities and design appropriate remedies both at the national and sectorial levels has been invaluable.”

- Financial Monitoring Service of Georgia



*Training session on “Liability of Legal Persons” for Georgian prosecutors
Tbilisi, Georgia, 28-29 June 2018*

3.4 PGG-Ukraine

In Ukraine, the Council of Europe assisted the National School of Judges (NSJ), an institution in charge of judicial training, in devising and implementing sustainable training programmes for judges covering three areas aiming to improve judicial skills in adjudicating corruption offences and to provide specialised knowledge in anti-money laundering.



*Training on “Judicial practice of adjudication of money laundering offences”
1-2 November 2018 at the National School of Judges (NSJ), Kyiv, Ukraine*

The Council of Europe cooperated closely with the thematic Working Groups of the National School of Judges in the setting of objectives and developing the content of the training manuals. Training programmes were tested through the pilot trainings for over 60 judges, which helped to assess the effectiveness of training modules, while expanding the participants’ subject-matter knowledge. Further training for 60 trainers ensured that subsequent trainings on adjudicating corruption offences and money laundering will be conducted by competent instructors using the developed materials.

Horizontal Facility for Western Balkans and Turkey

Funded
by the European Union



COUNCIL OF EUROPE



Implemented
by the Council of Europe

REGIONAL COOPERATION PROGRAMMES EU/CoE HORIZONTAL FACILITY FOR THE WESTERN BALKANS AND TURKEY



4 EU/CoE HORIZONTAL FACILITY FOR THE WESTERN BALKANS AND TURKEY

The European Union and Council of Europe’s Horizontal Facility for the Western Balkans and Turkey (hereafter referred to as “Horizontal Facility” [HF]) launched in May 2016 is specifically designed to support the improvement and implementation of relevant recommendations of the CoE Group of States against Corruption (GRECO) and Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (MONEYVAL) in beneficiary countries.

In the fight against economic crime, country specific interventions have been designed for Albania, Montenegro and Republic of North Macedonia.

For topics of cross-border relevance, regional-level activities were organised and included participants from Serbia, Bosnia and Herzegovina, and Turkey. The beneficiaries and counterparts of HF are mostly governmental bodies at all levels, but particularly specialised structures within the ministries of justice, interior and finance; specialised anti-corruption agencies; judicial and prosecutorial services, supervisory bodies; financial intelligence units (FIUs), and, in some instances, representatives of civil society.

4.1 HF-AEC-AL: Albania

In Albania, the Action against Economic Crime in Albania (AEC-AL) continued its support to the Ad Hoc Parliamentary Committee on Electoral Reform through the organisation of transparent and inclusive roundtable discussions and provision of recommendations on changes to the legislation pertaining to political party and election campaign financing. The proposed amendments were incorporated in the draft law on the Electoral Code which is pending for approval in Parliament. On the capacity building aspect, the Action contributed to enhancing the oversight of political finance of the Central Election Commission and independent auditors and financial experts, through several training and a peer exchange on the regulation and enforcement of political party finance rules with homologue institutions in France and Belgium.



*A Working Group Session on the development of an Asset Recovery and Asset Management Strategy.
5-6 November 2018, Durrës, Albania*

The asset declaration legislation was further improved through amendments to the existing law which took into account AEC-AL advice and paved the way to the implementation of the asset declaration and conflict of interest system. The Action provided the High Inspectorate for the Audit of Assets and Conflicts of Interests (HIDAACI) with the full hardware infrastructure needed to launch an electronic asset and conflict of interest disclosure system. In parallel with this, the Action developed capacities of HIDAACI to auditing asset declarations of elected persons and certain public officials through specialised trainings.



*Two-day training on “Asset tracing and identification for purposes of seizure and confiscation in a criminal case”
4-5 April 2018, Shkodër, Albania.*

The Action contributed to the strengthening of the Anti-Money Laundering and Countering of Financing of Terrorism legal and strategic framework. Recommendations to the draft “Law on organisation and functioning of the Agency for the Administration of Seized and Confiscated Asset were reflected in the draft law which is pending approval by the Ministry of Finance. A draft strategy and action plan on asset recovery was developed and is pending for approval by the Ministry of Interior. Supervisory authorities and the private sector representatives were trained and provided guidance on implementation of a risk based approach (RBA) to supervision. Following these recommendations the number of joint thematic inspections as reported by the Financial Intelligence Unit with other supervisors has substantially increased. Also as a result of the Action, Albanian Financial Supervisory Authority (AFSA) approved amendments to its Regulation to require its Reporting Entities to report annually (starting in 2018) certain AML/CFT relevant data and a self-evaluation of risks to the AFSA.

At the operational level, through provision of practical guidance, workshops and trainings, the Action has contributed to strengthening of law enforcement and criminal justice capacities on financial investigations in Albania.

4.2 HF-AEC-MNE: Montenegro

The Action against Economic Crime in Montenegro (AEC-MNE) supported the work of the Agency for Prevention of Corruption (APC), through the development of methodologies and strategic documents aimed at increasing its efficiency and effectiveness.

In the area of control of asset declarations, the APC has adopted a new methodology for verification of asset declarations of public officials, based on recommendations given through AEC-MNE. This methodology contains clear procedures for in-depth verification of assets declarations, including: tracking funds and assets through time; comparison of data among various databases and collection of information from numerous institutions and legal entities.

Furthermore, the track-record system for political party financing, designed through AEC-MNE, enables the Agency for Prevention of Corruption (APC) to collect and compare various data in areas of financing of electoral campaigns. The system was completed and put into use. The APC carried out control of financing of electoral campaigns based on the risk analysis prepared by AEC-MNE. Instead of general administrative control of all public authority bodies, in-depth field control was carried over entities with higher risk score.

In the area of public finances, State Audit Institution (SAI) and Supreme State Prosecutor (SSP) have signed the Protocol on Cooperation, previously developed within the AEC-MNE. This agreement should represent a solid base for overcoming an institutional impasse lasting over 10 years - during which SAI never submitted criminal charges and SSP never opened an investigation on the basis of findings of SAI. This goal will be achieved through concrete procedures for submitting notifications by SAI as well as deadlines for their processing by SSP.

In July 2018, two laws revised through support of the Action: the Law on Prevention of Money Laundering and Terrorist Financing and the Law on International Restrictive Measures were adopted in Montenegrin Parliament. Recognizing efforts of Montenegro to reach compliance with FATF and Moneyval recommendations, Moneyval has decided to remove the country from the Compliance Enhancing Procedures in December 2018.

In November 2018 the authorities launched the new National Risk Assessment from Money Laundering and Terrorist Finances under the auspices of the Action.



*Training for police, judiciary and prosecutors on processing economic crime cases
19-21 November 2018, Budva, Montenegro*



*Seminar on asset tracing and identification based on available data;
15 February 2018, Tivat, Montenegro*

4.3 HF- AEC- MKD: Republic of North Macedonia **

The Action against Economic Crime in the Republic of North Macedonia supported the efforts of the Macedonian authorities to improve the effectiveness of national anti-money laundering and combating financing of terrorism mechanisms as well as strengthen the measures for the protection of whistleblowers.



Seminar on "Protection of the banking system from misuse of money laundering and financing of terrorism and the role of the anti-money laundering and terrorism financing department"
*31 May 2018, Skopje, "the former Yugoslav Republic of Macedonia"****

In the course of 2018, the Action assisted the national authorities through activities in several areas, including: reviewing the Law on Restrictive measures and advising on its strengthening to bring it in line with international standards; supported the authorities in the process of updating the National Risk Assessment, and initiating steps towards establishing an Asset Recovery Office in the country.

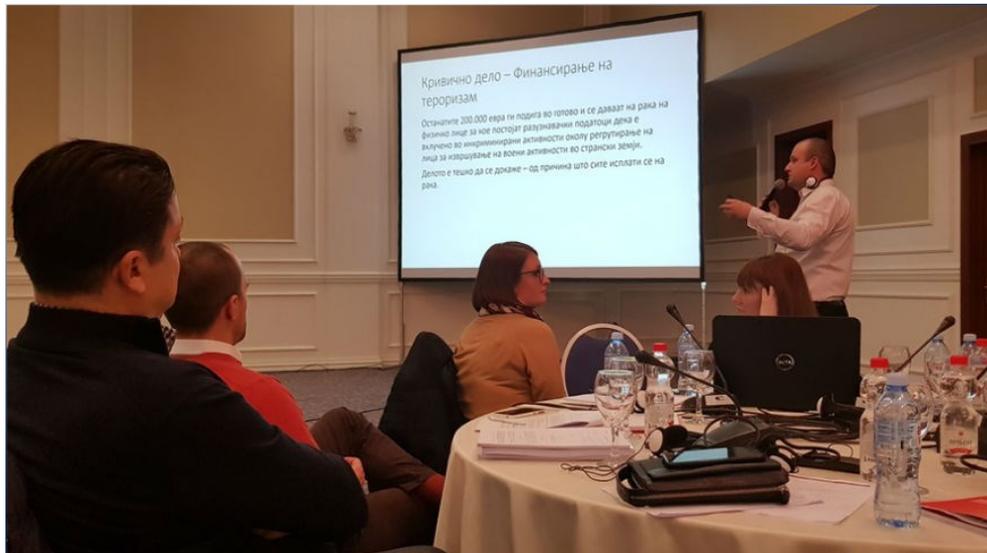
In connection with the above the Action against Economic Crime developed several advisory papers including: a) "Roadmap for the Central Registry to obtain, record and verify Beneficial Owner information", b) "Roadmap for the Establishment of an Asset Recovery Office", c) "Review of Supervisory Methodologies in AML/CFT", and, d) "Training manual for trainers on whistleblower protection".

Furthermore, the Action carried out a number of activities aimed at strengthening the capacity of the institutions handling economic crime in the country. The private sector was also supported through "Guidelines on the implementation of the financial measures set by the Law on International Restrictive Measures". These activities contributed to supporting the national authorities in addressing 20 specific MONEYVAL recommendations.

** As of 12 February 2019, the official name of the country changed to North Macedonia.

Through a series of workshops and training events the Action contributed to the strengthening of the capacities of institutions handling economic crime in undertaking financial investigations.

Through the development of a Training of Trainers on whistleblower protection, the Action contributed to the training of more than 30 representatives from the public sector.



*Workshops on updating the National Risk Assessment for Money Laundering and Terrorist Financing
19-20 November 2018, Skopje, "the former Yugoslav Republic of Macedonia"****

Ensuring Sustainable Democratic Governance and Human Rights in the Southern Mediterranean

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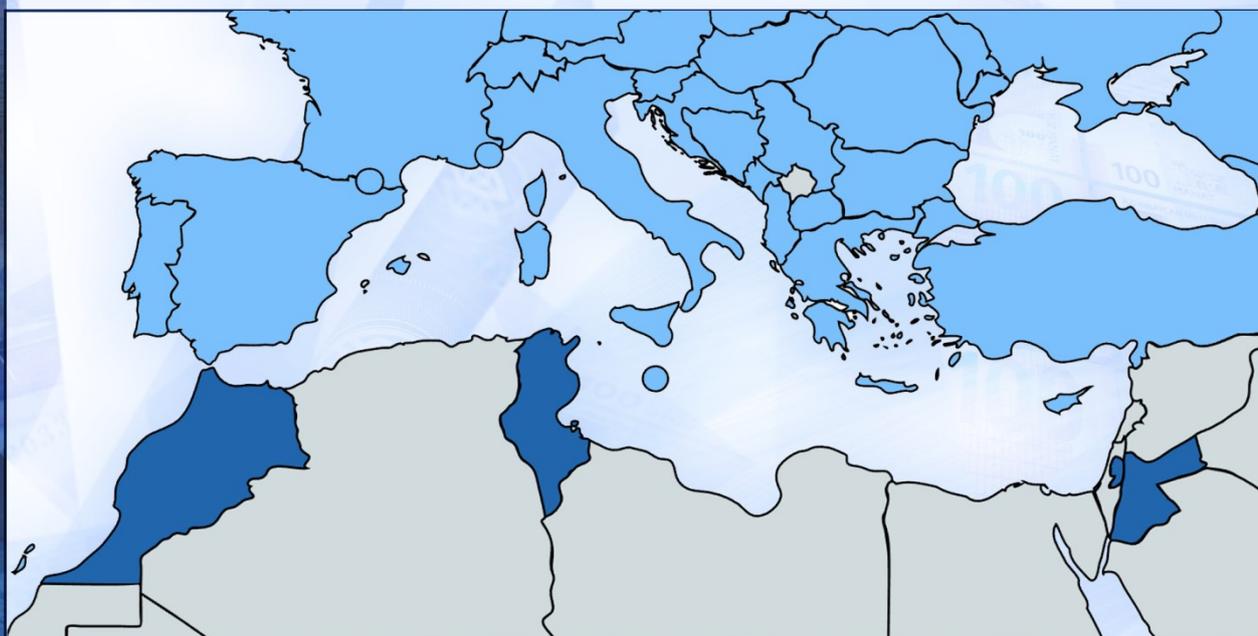


CONSEIL DE L'EUROPE

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REGIONAL COOPERATION PROGRAMMES

EU/CoE SOUTH NEIGHBOURHOOD PROGRAMME



5 EU/CoE SOUTH NEIGHBOURHOOD PROGRAMME: SNAC 2

The second phase of the South Neighbourhood Anti-Corruption Project (SNAC 2) wrapped up on 28 February 2018 after a 26 month implementation period.

In February 2018, the SNAC 2 Project continued the regional cascade training programme initiated in 2017 on private sector compliance and forensics. As part of this programme, a training for Jordanian supervisory bodies involved in corporate governance and compliance matters was delivered by Jordanian trainers, who had previously taken a SNAC 2 Training of Trainers course in Strasbourg. This activity raised awareness of Jordanian public sector officials and policymakers on the need to address private sector compliance issues at the national level, taking into account international business practices and trends.

A concluding training on financial forensics was carried out in Morocco for specialized units of the General Directorate of National Security (DGSN), which is to be followed up in the subsequent SNAC III Project.

6 EU/CoE SOUTH NEIGHBOURHOOD PROGRAMME: SNAC 3

The South Neighbourhood Anti-Corruption Project (SNAC 3) is an integral part of the regional South Programme III, funded by the EU and implemented by the CoE. The 2-year project started in March 2018, covering Morocco, Tunisia, Jordan and Palestine^{***}. As in the previous phases of the SNAC



Launch of South Programme III

Strasbourg, 18 September 2018

Project, SNAC 3 includes both country- or jurisdiction-specific interventions as well as a regional

^{***} This designation shall not be construed as recognition of a State of Palestine and is without prejudice to the individual positions of Council of Europe member states on this issue.

dimension where representatives of these jurisdictions participate in joint activities and share experience.

6.1 SNAC 3 – Jordan

The SNAC 3 Project continued its successful cooperation and partnership with the Jordanian anti-corruption authorities. The Jordanian Integrity and Anti-corruption Commission (JIACC) identified asset disclosures as a priority for implementation under the existing Jordanian legal framework with SNAC 3 assistance. In response, in November-December 2018 the SNAC 3 Project undertook a review of the Jordanian Illicit Enrichment Law and also developed guidelines on verification of asset declarations and conflict of interest management mechanisms. The implementation of this activity will support the work of the JIACC and the Legislation and Opinion Bureau of the Jordanian Ministry of Justice in developing amendments to the Illicit Enrichment Law.

6.2 SNAC 3 - Morocco



*Cascade Training on Banking Sector Compliance
22-24 October 2018, Rabat*

In 2018, the SNAC 3-Morocco Project delivered a cascade training programme on private sector compliance for the Moroccan banking sector and supervisors. In this regard, anti-corruption compliance capacities of both the Central Bank of Morocco and a number of commercial banks in the country were enhanced through a series of training sessions in October and November 2018.

These activities also presented an opportunity for the supervisory authority of the Moroccan banking sector and banks

subject to its regulation to come together to discuss compliance issues from their own respective points of view. The success of these activities led to a request by beneficiaries to undertake a corruption risk assessment in the Moroccan banking sector. This exercise is scheduled to take place in the first quarter of 2019 and aims at providing recommendations for national authorities which will enable them to develop strategies for mitigating the identified risks.

6.3 SNAC 3 – Tunisia

The SNAC 3 Project continued its work to enhance the capacities of the Tunisian Anti-corruption Agency (*Instance Nationale de Lutte Contre la Corruption*, INLUCC) on the investigation of corruption cases. INLUCC investigators benefitted from capacity building and training on investigative tools and techniques, ranging from the gathering of evidence and documentation to witness interviews and analysing financial data.



*Training on investigation of corruption cases
July 2018, Tunis*

During the period 1 January 2019 – 31 December 2021, cooperation with Tunisian anti-corruption authorities, in particular the INLUCC, will continue under the Tunisia Anti-corruption Project, which is an integral part of the joint EU/CoE intervention Project to Support Independent Institutions in Tunisia (*Projet d'appui aux organismes indépendants en Tunisie, PAII-T*)

6.4 SNAC 3 - Palestine***

The SNAC 3 Project launched a corruption risk assessment of the judiciary in Palestine.*** An initial scoping visit to Ramallah was held in December 2018, allowing the Project team to meet with actors of the Palestinian justice system, including members of the judiciary, attorney general's office, bar association, Palestinian Anti-corruption Commission as well as representatives of the civil society. The findings of these technical meetings will be further used in subsequent stages of the risk assessment, which will be completed in 2019.



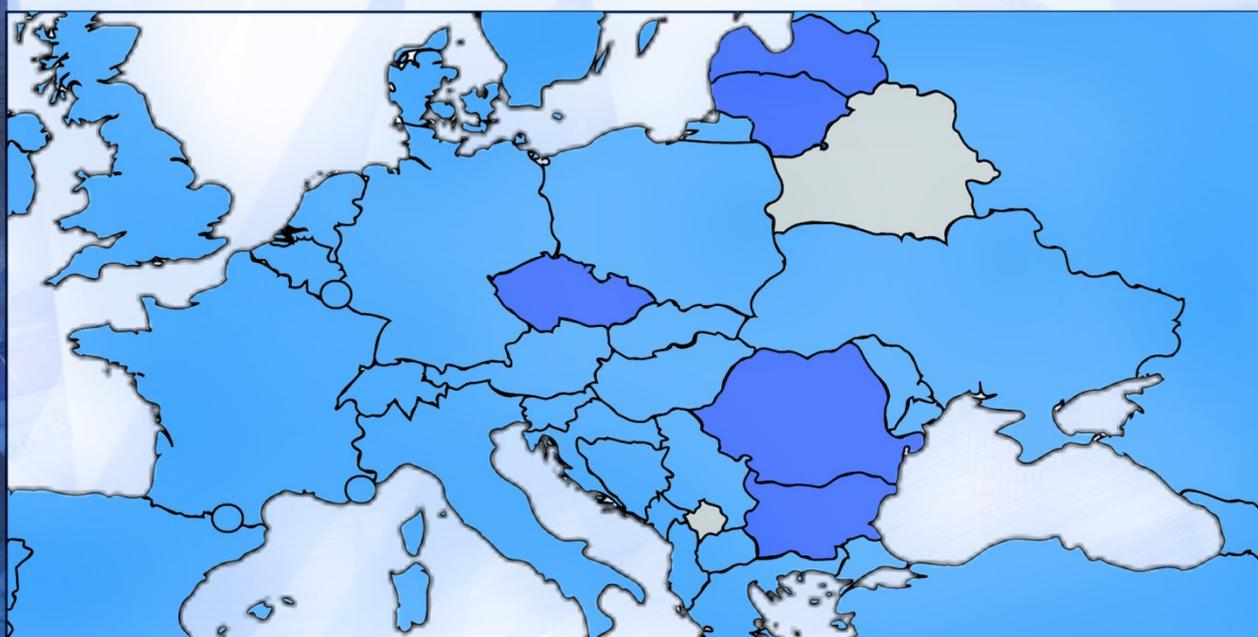
Corruption Risk Assessment in the Judiciary

Ramallah, 16-17 December 2018

Iceland
Liechtenstein
Norway grants

Norway
grants

COOPERATION UNDER THE NORWAY/EEA GRANTS



7 NORWAY/EEA GRANTS*

The EEA Grants and Norway Grants represent the contribution of Iceland, Liechtenstein and Norway to reducing economic and social disparities and to strengthening bilateral relations with 15 EU countries in Central and Southern Europe and the Baltics.

The EEA and Norway Grants have their basis in the EEA Agreement. Under this agreement, Iceland, Liechtenstein and Norway are part of the European internal market. The agreement sets out the common goal of working together to reduce social and economic disparities in Europe and strengthening cooperation between European countries

The EEA Grants and Norway Grants are set up for five-year periods. For the period 2014-2021, €2.8 billion has been set aside under the Grants. The EEA Grants (€1.5 billion) are jointly financed by all three donors and available in all 15 countries. The Norway Grants (€1.3 billion) are financed solely by Norway and available in the 13 countries that joined the EU after 2003.



Norway Grants Stakeholder Consultations in Latvia

Riga, Latvia 13 March 2018

Since 2012, the European Economic Area (EEA) and Norway Grants (NG) entered into partnership with the Council of Europe to enhance democratic principles and promote international standards in the grant schemes. The CoE is an International Partner Organization for the EEA/Norway Grants platform, which generally aims at reducing economic and social disparities and strengthening bilateral relations among 16 EU countries in Central and Southern Europe and the Baltics.

In this context, ECCD provides strategic advice as well as technical input and know-how in its areas of expertise: anti-corruption, anti-money laundering, countering terrorism financing and asset recovery.

* Norway Grants [website](#)

In 2018, the ECCD was engaged in the development of the cooperation priorities for the new cycle of EEA/Norway grants (2014-2021) in the following member states:

8 BULGARIA

Further to the results achieved in 2017, in 2018 ECCD ensured the broadening of the anti-corruption component of the Norway Grants Home Affairs Programme in Bulgaria to support significant anti-corruption developments in the country. More specifically, the merging of a number of institutions and agencies under the umbrella of a new Anti-Corruption Commission required additional support to this institution. This additional support was achieved following ECCD input by reformatting the umbrella programme, and ensuring a reallocation of additional funding for an anti-corruption project.

9 CZECH REPUBLIC

Through its input, the ECCD ensured that the EEA/Norway Grants Programme on Good Governance and predefined projects address the recent Moneyval evaluation recommendations issued to the Czech Republic. To this effect a predefined project was designed with ECCD input to address identified gaps in the effectiveness of law enforcement, shortcomings in the field of combating terrorism financing. In the anti-corruption field, ECCD assisted with the design and preparation of a project proposal in order to address gaps in the regime to protect whistleblowers, conflict of interest regulatory framework, as well as codes of conduct for judges and prosecutors.

10 LATVIA

ECCD advised the development of the Norway Grants Programme for Latvia on International Police Co-operation and Combating Crime. As a result the components aimed at combating corruption, and economic crime with a particular focus on the money laundering threats facing Latvia were included in the programme scope, including for the purpose of addressing the recommendations of a recent Moneyval evaluation. This is particularly important in the context of stepped-up national and international efforts to prevent wide-scale money laundering through Latvia's financial system. As a result of ECCD advice a projects on AML/CFT and anti-corruption will be included in the programme.

11 LITHUANIA

ECCD provided advice on the preparation of the Justice and Home Programme for Lithuania. In particular, ECCD advised on the need to expand the range of stakeholders of the programme to include additional agencies in the area of the economic crime, in particular given the very recent Mutual Evaluation of Lithuania by the Council of Europe Anti-money laundering Committee (MONEYVAL) in 2018 and the need to address gaps identified therein. Furthermore, anti-corruption, ethics and integrity issues were included as cross-cutting elements in the programme as a result of ECCD advice.

12 ROMANIA

ECCD fulfilled its advisory role primarily in respect of the project "Strengthening national capacities in the area of international police cooperation and combating crime" in the Home Affairs Programme. In

the framework of this project, Romanian authorities sought ECCD assistance on the implementation of a National Risk Assessment (NRA) on money laundering and combating terrorism financing.

JURISDICTION-SPECIFIC PROJECTS



13 Kosovo*

The joint EU/CoE Project against Economic Crime in Kosovo* (PECK II) provided substantive support with tangible impact for reforming and strengthening institutional capacities of Kosovo* authorities to counter corruption, money laundering and financing of terrorism in accordance with European and international standards.



High-level conference to present the AML/CFT Assessment Reports

Pristina, Kosovo, 16 November 2018*

Two comprehensive assessment reports in anti-corruption (AC) and anti-money laundering and combating financing of terrorism (AML/CFT) areas, modelled on GRECO and FATF/MONEYVAL assessment methodologies were finalised and shared with authorities, presenting the major outcomes of the Project.

Tangible impact by PECK II is noted in the legislative area, which resulted in enactment of legal acts crucial for the prevention and fighting of economic crime. Such legal acts include i) Law on Protection of Whistleblowers ii) Law on Prevention of Conflict of Interest in Discharge of Public Functions and iii) Criminal Code provisions covering corruption and terrorism offences. Moreover, PECK II is also supporting the drafting process of the Law on Targeted Financial Sanctions related to terrorist financing and proliferation.

With regard to implementation of enacted legislation, PECK II produced a Handbook on Protection of Whistleblowers and a Toolkit on Managing Conflict of Interest in Public Service with the aim of assisting public officials in the effective application of their duties.

* All references to Kosovo, whether to the territory, institutions or population, in this text shall be understood in full compliance with United Nations Security Council Resolution 1244 and without prejudice to the status of Kosovo.



EU/Council of Europe Joint Project against Economic Crime (PECK II) organised a public event with high school students to mark International Anti-corruption Day. Pristina, Kosovo, 11 December 2018*

PECK II contributed to public awareness activities (covered extensively by local media). In this regard, PECK II organised high level public events to mark the International Day of Whistleblowers as well the International Anti-corruption Day. A high level conference to present the assessment reports in (AC) and (AML/CFT) received significant coverage by the media.

In terms of capacity building and international networking, PECK II organised an exchange of experience with AML/CFT authorities in the Czech Republic, whereas a study visit to the

Dutch Financial Intelligence Unit and EUROPOL served to enhance cooperation and experience on the use of tools and systems to prevent and combat money laundering and financing of terrorism.

In order to ensure successful follow-up to key legislative initiatives and promote international networking for Kosovo practitioners in the fields of AML/CFT and anti-corruption, the PECK II Project was extended for a 9-month period until September 2019.

14 KYRGYZSTAN

The joint EU/CoE Project “Strengthen Prevention and Combating of Corruption in Kyrgyz Republic” (SPCC-KY) aimed to assist Kyrgyz authorities in strengthening their rule of law capacities to prevent and fight corruption in the Kyrgyz Republic. The project ended in July 2018.

The project contributed to the achievement of the above-mentioned purpose by working with Kyrgyz authorities in four main areas: 1) enhancing adherence to European and international anti-corruption standards; 2) improvement of mechanisms to implement effective anti-corruption strategies and policies; 3) strengthening capacities and skills of judiciary, prosecution and law enforcement agencies to address corruption; and 4) improving anti-corruption communication with the public.

The project facilitated legislative reforms in the Kyrgyz Republic through a set of comprehensive legal reviews in the field of anti-corruption, whistleblower protection, anti-money laundering and mutual legal assistance vis-à-vis international and European standards. The findings of these reviews are either incorporated or under consideration by national authorities, in preparation of applications for accession to European conventions.

The project supported institutional and strategic anti-corruption reforms in several key areas of the national anti-corruption framework. The anti-corruption strategy and interagency cooperation practices were reviewed and the project’s recommendations are being taken into account by the Government in the on-going reform process.

The project enhanced the capacities and skills of judiciary, prosecutorial and law enforcement agencies to efficiently address corruption and specialised economic crime cases. A programme of trainings, including training of trainers (ToT) on investigation methodologies and operational procedures on corruption related offences was successfully delivered. The same target audiences benefitted from trainings on application of ethics and conflict of interest standards.

In December 2018 at the request of the Kyrgyz side, a high-level visit of a Kyrgyz delegation was organized to the Council of Europe, whereby the Project outcomes and future pathways for cooperation were discussed, including the future regional programme for Central Asia. During the visit the Kyrgyz authorities once again expressed their appreciation for the Project outcomes, this time through an official Decree and honour award of the General Prosecutor of Kyrgyzstan.



Ms D. Dzhamanbaeva, Deputy Prosecutor General of Kyrgyzstan, presents an honorary award to Mr I. Koedjikov, Head of CoE Action against Crime Department

15 RUSSIA

The project on “Protection of the Rights of Entrepreneurs in the Russian Federation from Corrupt Practices at the Municipal Level” – PRECOP II, launched in 2016 (with an implementation timeline of 36 months) is a continuation of the project “PRECOP RF”. The project focuses on addressing corruption at the municipal level in select regions of the Russian Federation, given that it is in the municipalities where in particular small and medium-size enterprises face the biggest obstacles created by various administrative and corruption-prone practices.



A Workshop on legislation regulating the inspections system

Moscow, Russian Federation, 24 September 2018

In 2018, the project focused its efforts in 15 pilot regions, though the project results reached further beyond. To date, 77.23% of the required funding was secured, with funding coming through voluntary contributions from the UK, Norway and Luxembourg.

Three Technical Papers (TPs) were completed and seven new TPs were initiated in 2018, including two training handbooks. The TPs contain specific

recommendations, which address identified shortcomings and gaps in the legislation or/and institutional practices at the municipal level in line with international standards and good practices in

the following areas: procurement-related corruption risks; state and municipal inspections; prevention of corruption in provision of public services for business entities; confidential (anonymous) reporting of corruption by entrepreneurs. The recommendations provided in the TPs are of high importance for business.

The main findings and recommendations formulated in these papers were extensively discussed during 15 workshops and 2 trainings with active participation and input from all relevant stakeholders. This input was taken into consideration while developing the recommendations so as to ensure these take into account the country context and reform processes and best address the needs of the entrepreneur community. The *Annual reports of the Federal Business Ombudsman to the President of the Russian Federation* regularly reflect the project's work and recommendations.

The findings from the Technical Papers are widely applied by the ombudspersons in their work in the project's pilot regions and beyond. For instance, the recommendations made in the Technical Paper on "Corruption factors and risks in public services provided to business entities in the Russian Federation" led to removing corruption-prone provisions from a number of municipal acts of Petrozavodsk – the capital city of the Republic of Karelia;

PRECOP II continued to be an effective platform for exchange of views and expertise between regional business ombudspersons, representatives of business community, relevant ministries and institutions, which, in turn, contributed to further strengthening the institute of business ombudspersons.

16 REPUBLIC OF MOLDOVA

The EU/CoE Project Controlling Corruption through Law Enforcement and Prevention (CLEP) continued its support to the Moldovan institutions in anti-corruption, anti-money laundering and asset recovery. In collaboration with the National Anti-Corruption Centre (NAC), the project increased the knowledge of more than 220 local level officials on data collection, monitoring and reporting on the anti-corruption action plans linked to the National Integrity and Anti-Corruption Strategy for 2017-2020. CLEP also supported the Ministry of Health, Labour and Social Protection (MHLSP) in finalizing the anti-corruption sectorial plan, which was approved by Government Decision in September 2018. In connection to these efforts, CLEP developed an integrity curriculum for medical professionals, which was embedded in the continuous medical education programme and made obligatory for managers of public institutions by the MHLSP. As further support in high-risk sectors, the project created a curriculum on anti-corruption compliance for private sector actors, which was piloted and handed over to NAC.



Second Working Group to draft the Health Anti-corruption Sectorial Action Plan

Chisinau, Republic of Moldova, 24 April 2018

The National Integrity Authority (NIA) was equipped with guidelines for new integrity inspectors and Standard Operating Procedures for inspections. Both documents were adapted to NIA's working processes and followed by a mentoring session with international experts. Guidelines for managers of public institutions on identifying and solving conflict of interest have been published, distributed to all regions in the country (57 institutions). Over 100 local level officials were trained on this subject, in cooperation with NIA.

In the field of anti-money laundering, as a result of CLEP's activities the new guidelines for identification and reporting of suspicious transactions and on Politically Exposed Persons (PEPs) were aligned with international standards and published by the Financial Intelligence Unit (FIU). The capacities of a substantial number of representatives of Financial Institutions and Designated Non-Financial Businesses and Professions were increased with specialized training. In close partnership with the National Institute of Justice, CLEP also delivered trainings on money-laundering investigations and new trends to judges and prosecutors. In addition, the project supported the FIU in drafting the new AML/CFT Strategy and assisted in the consultation process with relevant authorities. An expert's opinion on the draft Law on AML/CFT sanctions and sanctioning procedures was provided to the FIU. Similarly, the Asset Recovery Office (ARO) was supported in drafting an Institutional Strategy and Action Plan, which were officially presented and approved, and benefited from specialized training.

With regard to facilitating inter-agency coordination, NAC and NIA carried out joint trainings on integrity related topics during 2018 and signed a new cooperation agreement. Additionally, CLEP delivered a set of recommendations focused on improving effectiveness of inter-agency agreements on data and information exchange. Some of the institutions targeted by this action are in the process of reviewing the agreements. Concerning international cooperation, international MoUs on data, information exchange as well as investigations of economic crimes were reviewed and recommendations delivered to the institutions.

Lastly, civil society has been engaged by CLEP in two workshops on anti-corruption monitoring and reporting. Such activities continued by training 15 Civil Society Organizations on the Moldovan legislative and institutional integrity framework, corruption risk assessment and use of its findings to carry out activities. Consequently, CSOs started planning actions in the field of anti-corruption.

**ECCD NEXUS WITH RELEVANT
CoE MONITORING BODIES
&
INTERNATIONAL PARTNERS**



17 THE NEXUS WITH RELEVANT COE MONITORING BODIES

The ECCD continued to uphold its professional relations and ensure horizontal exchanges where possible with both CoE monitoring bodies which cover the main areas of focus for the ECCD, namely GRECO and MONEYVAL.

In view of this, GRECO and MONEYVAL evaluation reports are regularly used (where and when applicable) to establish the CoE cooperation baseline during the project development and implementation phases.

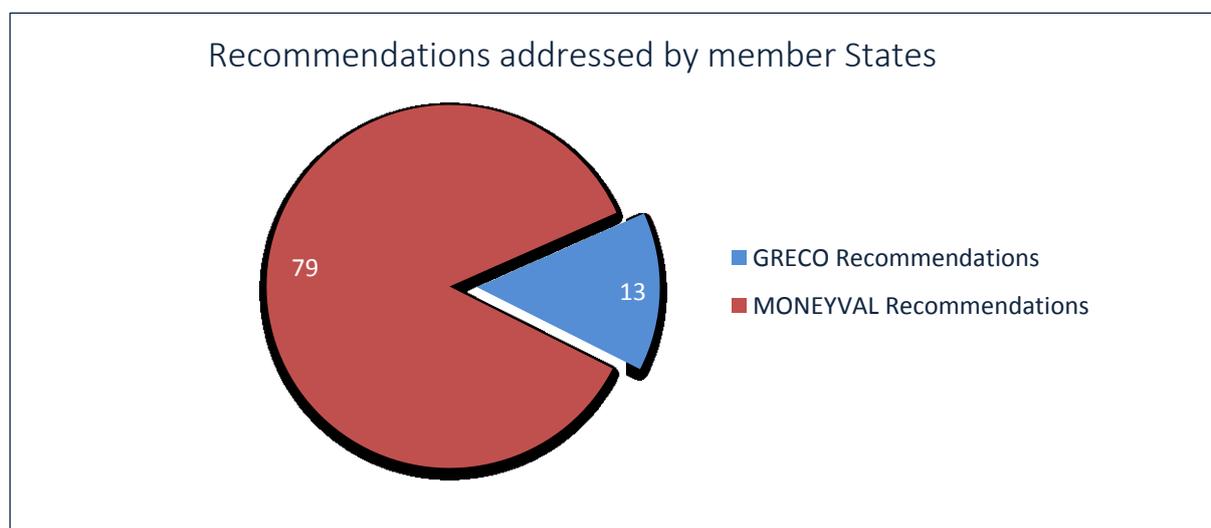
GRECO and MONEYVAL reports and their standing recommendations served as an important source for establishing relevant OVIs in the design of Programmes under three Horizontal Facility Actions against Economic Crime (HF-AEC) in Albania, Montenegro and Republic of North Macedonia, and as OVIs only in the EEA/Norway Grants framework, in particular for the Czech Republic, Romania and Bulgaria.

Cooperation and information-sharing practices between the ECCD and the GRECO/MONEYVAL Secretariat helped once again in 2018 to synchronize where possible the design

of cooperation programmes , projects and interventions when possible with and GRECO and MONEYVAL evaluations.

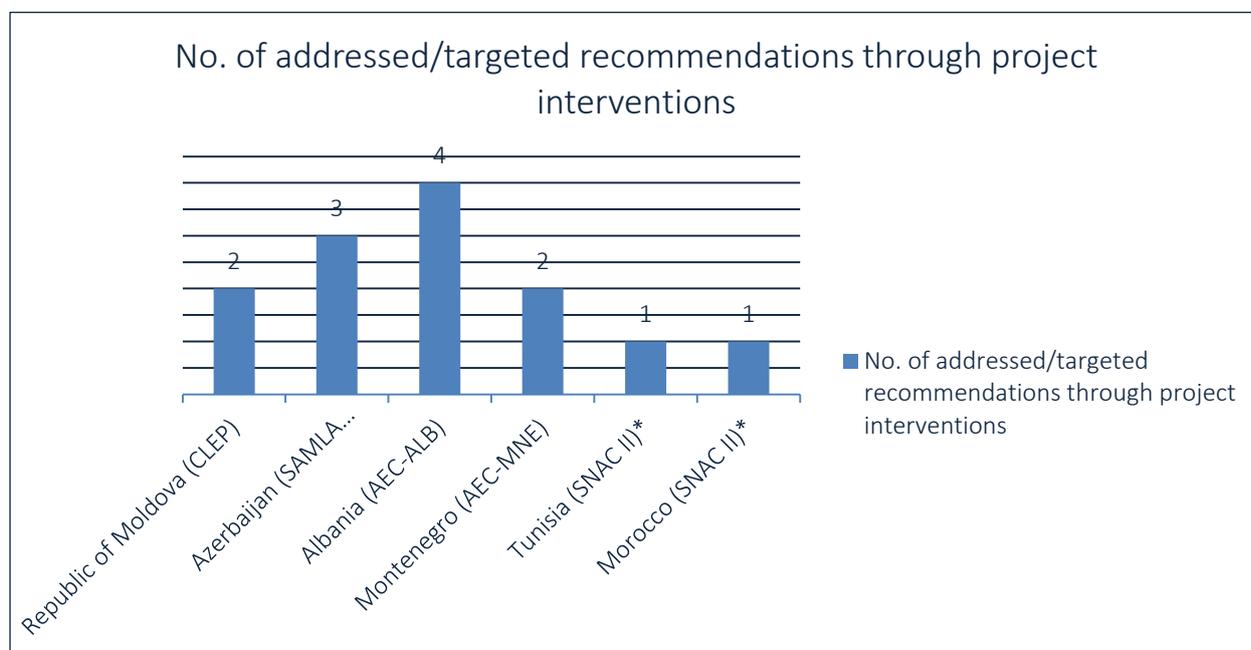
18 TECHNICAL COOPERATION SUPPORTING IMPLEMENTATION OF RECOMMENDATIONS

During 2018, through technical assistance activities in regional and national level, the ECCD has supported member States to address 92 recommendations provided by GRECO and MONEYVAL, CoE's monitoring bodies on corruption and money laundering and terrorist financing.



19 SUPPORTING MEMBER STATES IN ADDRESSING GRECO RECOMMENDATIONS

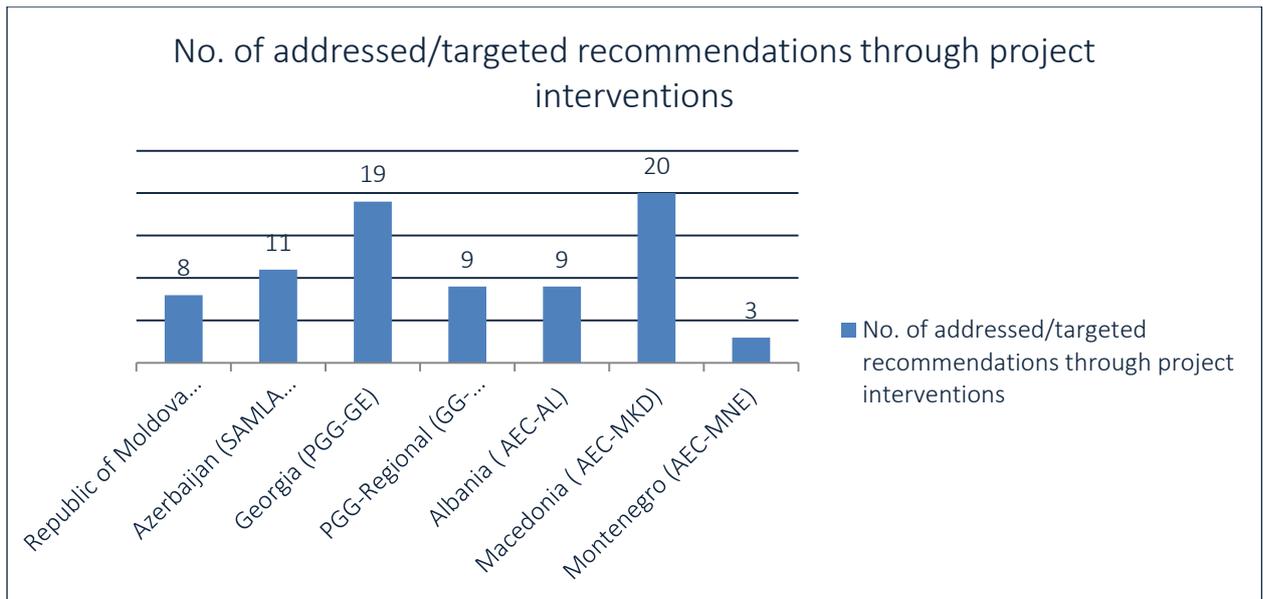
The ECCD has supported the implementation of 13 jurisdiction-specific GRECO recommendations. For instance, through the work undertaken by CLEP, the Republic of Moldova was supported in creating a more effective assets declaration system, thus addressing recommendation IV of the GRECO's Fourth Evaluation Round.



20 SUPPORTING MEMBER STATES IN ADDRESSING MONEYVAL RECOMMENDATIONS

In 2018, ECCD's programmes and activities assisted member States in addressing 74 MONEYVAL recommendations covering a range of AML/CFT issues. Through the Horizontal Facility, for instance, the ECCD supported authorities in Albania, Montenegro and Republic of North Macedonia through a variety of tailored activities. Contributions within the same programme included also *ad hoc* actions, for instance in response to Montenegro's request to support authorities to address legislative deficiencies related to the Financing of Terrorism. Through the same programme in Albania, the ECCD supported the authorities in strengthening the risk-based approach (RBA) to Supervision of the financial sector as well as in the development of the draft AML/CFT legislation in order to meet relevant international standards.

* Note: Values for Tunisia and Morocco are based on ECCD assessment of their anti-corruption frameworks (modelled on GRECO Evaluations).



21 COOPERATION AND COORDINATION WITH INTERNATIONAL PARTNERS

21.1 European Commission

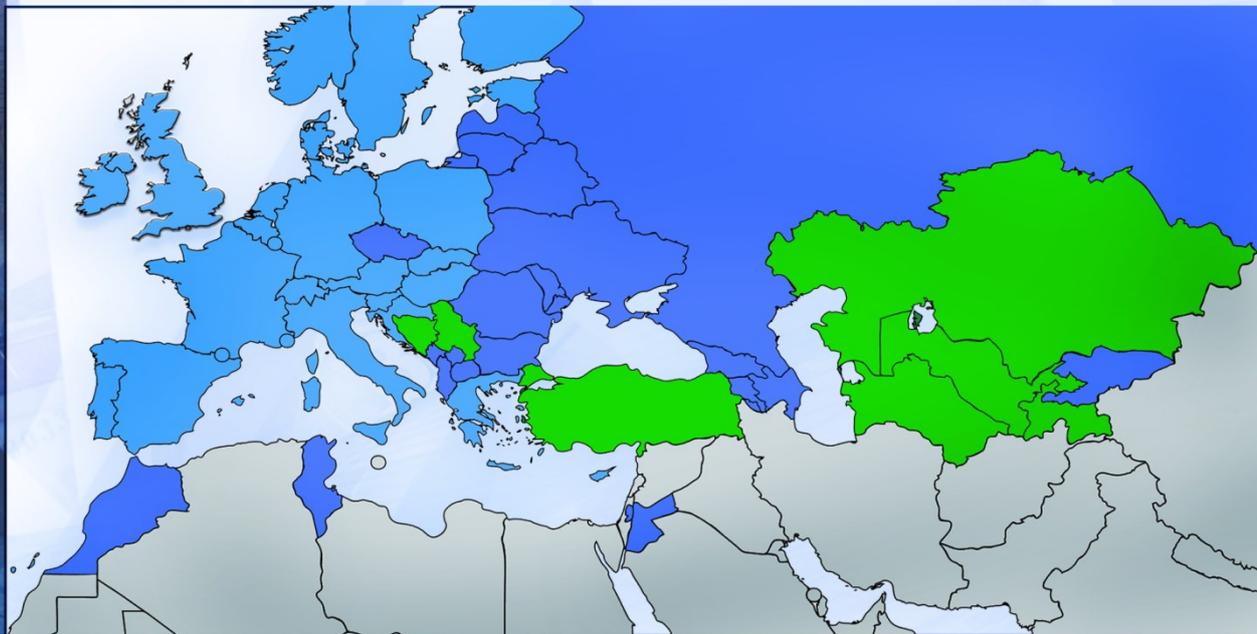
The Economic Crime and Cooperation Division attended a meeting of Eastern Partnership Platform 1: “Strengthening institutions and good governance” on 20 April 2018 and its Rule of Law Panel meeting on 26 June 2018. The objective of the Platform 1 is to review progress on the improved functioning of institutions and good governance, with the aim of strengthening the rule of law and democracy, in respect for human rights and fundamental freedoms. More precisely, the Panel addressed challenges that prosecution services are facing today in prosecuting high-level corruption. At both meetings, the ECCD highlighted progress in the implementation of the anti-corruption actions in the EaP region and its approach through technical assistance in addressing current challenges.

21.2 OECD Anti-Corruption Network for Eastern Europe and Central Asia (ACN)

The Economic Crime and Cooperation Division (ECCD) attended the 19th Plenary Meeting of the OECD Anti-Corruption Network for Eastern Europe and Central Asia (ACN), which took place on 3-5 July 2018 in Paris.

At the cooperation and coordination of technical assistance session, the ECCD outlined current reform processes supported by the Council of Europe in its member states as well as on-going and pipeline projects in non-member states of the Central Asian region. An emphasis was put on the impact of CoE’s work in influencing legislative processes, providing and supporting policy and strategy reforms which address GRECO and MONEYVAL recommendations at the national level.

ECCD PIPELINE PROJECTS



■ ON-GOING PROJECTS
■ PIPELINE

22 PIPELINE PROJECTS

22.1 Partnership for Good Governance (PGG) – Phase II

The ECCD will continue to support the EaP jurisdictions with their reform agendas and institutional capacity building within the second phase of the PGG programme from January 2019.

The Eastern Partnership countries re-iterated with their commitment to strengthening democracy, rule of law, human rights and fundamental freedoms at the Eastern Partnership Summit in Brussels on 24 November 2017. The six EaP countries endorsed a set of 20 Deliverables that set out a work plan to be achieved by the year 2020 in four priority areas, on the basis of already existing commitments on both EU's and Partner Countries' side. Promoting democratic consolidation and governance through justice reform and reinforcement of the rule of law on the basis of the EaP deliverables is thus at the centre of the EU's cooperation with its Eastern Partners.

The PGG Programme, including regional and bilateral actions, is designed to assist the six EaP countries – Armenia, Azerbaijan, Belarus, Georgia, Republic of Moldova and Ukraine.

Through five country-specific projects in Armenia, Azerbaijan, Belarus, Georgia and Ukraine and a regional intervention the CoE will support the countries in addressing outstanding recommendations of the CoE monitoring bodies (GRECO and MONEYVAL). In doing so, the technical assistance activities will facilitate progress towards achieving tangible results across rule of law and anti-corruption indicators as agreed at the EU's 5th EaP Summit in Brussels, in 2016.

22.2 Horizontal Facility for Western Balkans and Turkey – Phase II

According to the 2018 accession strategy for the Western Balkans, all countries in the region will have to have demonstrated a concrete and sustained track record in tackling corruption, money laundering and organized crime, as a matter of urgency, if they wish to be considered as candidates states in 2018^[1]. In doing so, the countries in the region will also need to address a number of weaknesses identified in each of the jurisdictions, including process to corrupt practices associated with public procurements and ambiguity of ownership data.

Through the Horizontal facility for the Western Balkans and Turkey – phase II the Council of Europe and the European Union will continue to support the countries in South East Europe in addressing priority reforms in the area of fighting against Economic Crimes. The next phase is planned as a combined intervention of 3 country specific actions in Albania, Montenegro and North Macedonia and a regional Action which in addition to the above mentioned three jurisdictions will also involve Bosnia and Herzegovina, Kosovo*, Serbia and Turkey.

The HF phase two is a three year programme which will start in May 2019 and last until May 2022.

^[1] [A credible enlargement perspective for and enhanced EU engagement with the Western Balkans](#)

22.3 Improving International Judicial Cooperation in Criminal Matters in Turkey

Strengthening the capacities of the Turkish authorities in the international Cooperation in criminal matters is one of the key priorities identified by the European Union within the scope of the Instrument for Pre-Accession Assistance.

The proposed intervention by the Council of Europe will directly address the stated priority and aims at strengthening the capacities of Turkish authorities to establish effective and expedited international Cooperation in criminal matters. Through the project activities and actions the Council of Europe will tackle some of the key institutional, legislative and capacity building needs of Turkey.

The project will support authorities through advice on strengthening the legislative framework and human resources capacities as well as building technical (IT) capacities for monitoring and the processing of information from incoming and outgoing requests for international cooperation.

It is foreseen that the project will support the Turkish authorities in strengthening the international cooperation in criminal matters including by developing effective regional and bilateral judicial cooperation in criminal matters, and acceleration in judicial proceedings regarding cross border criminal disputes.

22.4 Non for Profit Organisations and Terrorist Financing Risks (NPO-TF)

The NPO-TF is a regional project proposal focusing on countries of the Western Balkans and Turkey. The objective of the project is to enhance the regional security by prevention of terrorist financing through the abuse of NPOs.

While the non-profit sector generally provides beneficial services to various communities, reports of NPOs being used to launder money for terrorist organisations can undermine and damage public trust in the often vital work carried out by charities and humanitarian organisations, among others. The project would address key issues such as Risk Mapping and Mitigation of NPOs Terrorist Financing; Prevention of Terrorist Financing; and advise on the necessary regulatory frameworks.

The project aims to develop an efficient and sustainable regional framework for preventing terrorist financing through non-profit organisations, and ensure that both authorities and the NPOs are suitably equipped to prevent, detect and disrupt such illicit activity. The project would also aim to improve the implementation of relevant standards and applicable recommendations, including those from MONEYVAL evaluations, relevant to addressing risks of terrorist financing in the NPO sector, while also enhancing regional cooperation by helping to develop common approaches towards the suppression and disruption of terrorist financing through respective non-profit sectors.

22.5 Programme of support to civil society and independent authorities in Tunisia (PASC)

The ECCD is engaged in the development of a joint CoE/EU Programme of support to civil society and independent constitutional authorities in Tunisia. A significant component of this programme will be focused on the National Authority on Good Governance and Fight against Corruption (IBOGOLUCC). ECCD's assistance will aim at the successful operationalization of this new constitutional body, and the development of its interagency links with other institutions, as well as civil society.

22.6 Project against Economic Crime in Kosovo* (PECK III)

The ECCD is developing a third phase project proposal aimed at further support to Kosovo authorities in the field of combating corruption, money laundering, terrorism and its financing. The Project will be a continuation phase of ECCD action against economic crime in Kosovo, which commenced since in 2012 and involved the application of assessment methodologies modelled on GRECO and MONEYVAL procedures. PECK III will closely follow-up on previous assessments through tailored capacity building for key institutions, as well as expanded activities in the field of counterterrorism.

22.7 Promoting transparency and action against economic crime in Central Asia

The ECCD advanced the preparation of a new regional and country specific project proposal aimed at promoting transparency and countering economic crime in Central Asia including Kazakhstan, Kyrgyzstan, Tajikistan, Turkmenistan and Uzbekistan. The project will cover issues pertaining to business transparency, protection of entrepreneurs' rights, corruption prevention, law enforcement capacities and anti-money laundering/combating the financing of terrorism.



*Meeting at the General Prosecutor's Office, 31 January
2018
Tashkent, Uzbekistan*

This is the first time that CoE has initiated cooperation in this field, in particular with Tajikistan, Turkmenistan and Uzbekistan. For this purpose, the ECCD held technical assistance needs assistance missions to these three countries in January-February 2018, conducting meetings with anti-corruption, law enforcement, supervisory and other authorities. A detailed project concept was subsequently prepared based on specific needs and priorities discussed with these government institutions. A regional component aiming to ensure the sharing of experience among the Central Asian countries will be included as a key priority, aiming inter alia to identify regional trends, risks and typologies in the field of business integrity and combating economic crime.

The project is part of a Rule of Law Programme to be funded by through the European Union.

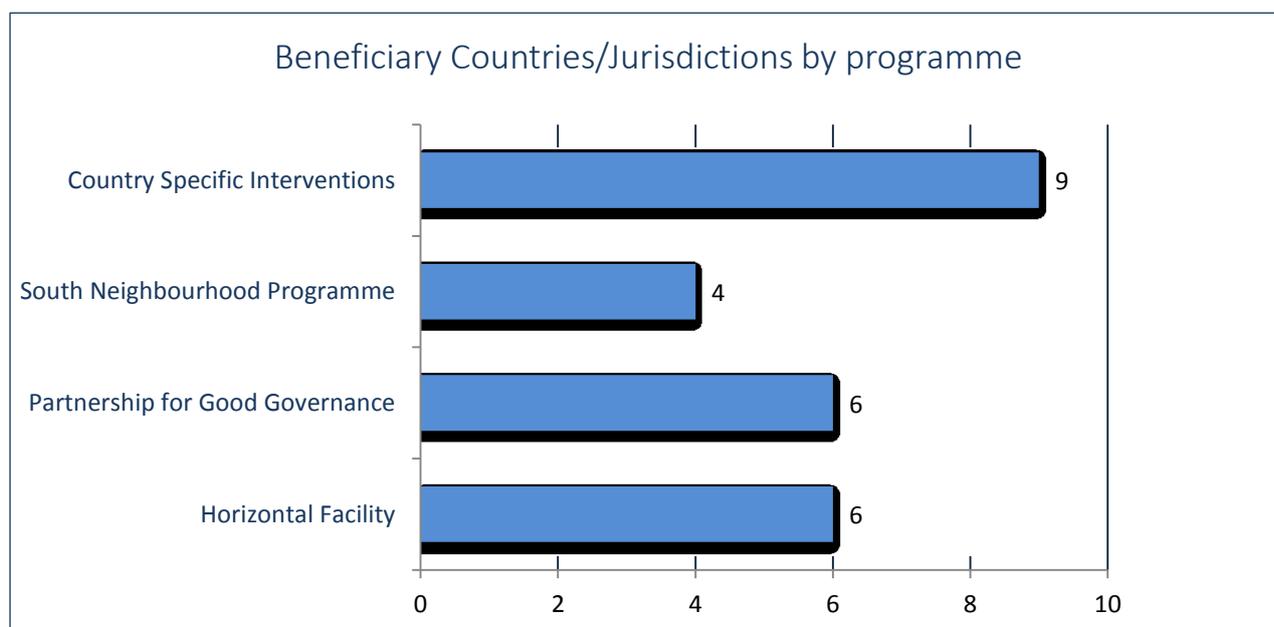
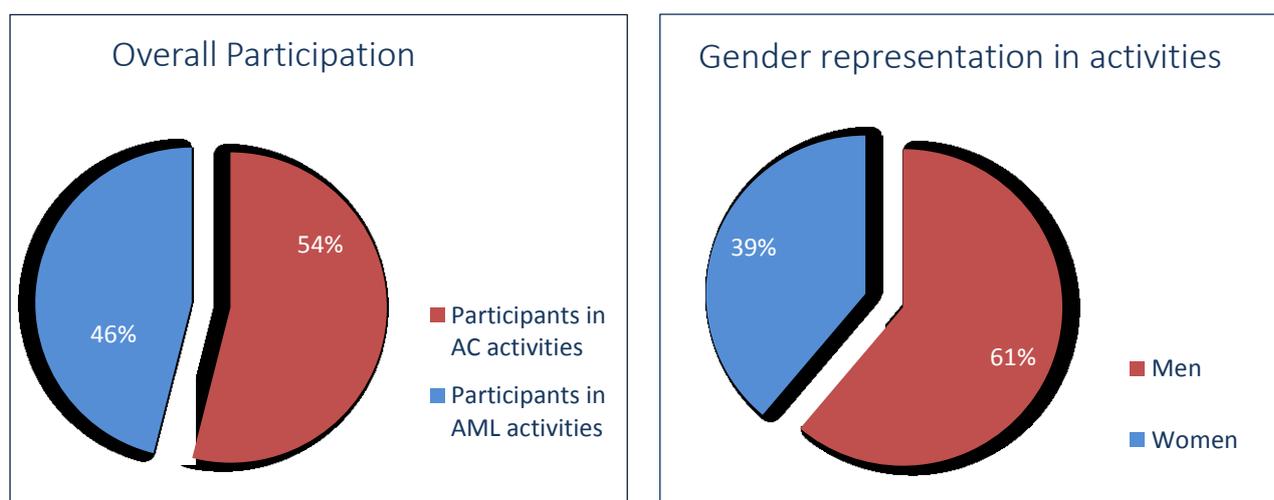
STATISTICS



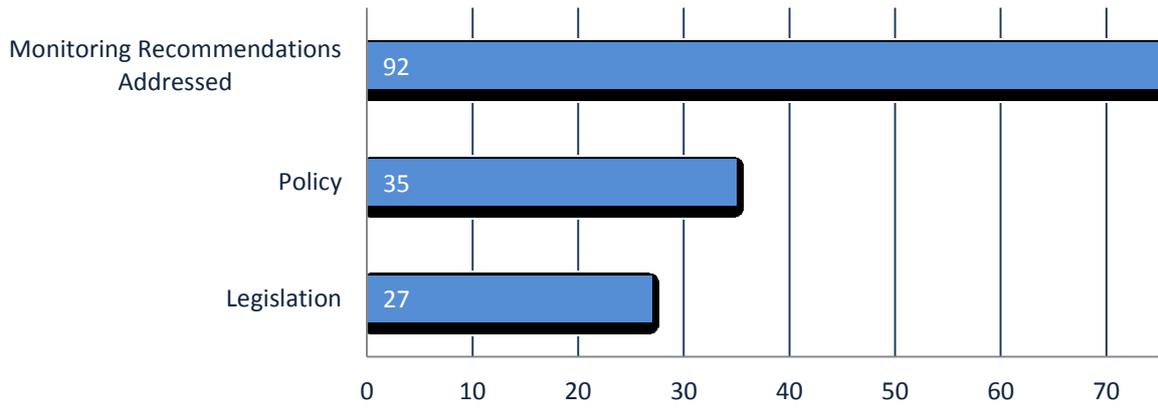
23 ECCD ACTIVITY IN 2018 THROUGH NUMBERS

In 2018 ECCD organised and co-organised over 140 activities involving almost 5000 beneficiaries/participants. In 2018, the ECCD continued to maintain “impact statistics” in order to measure the role of project interventions in influencing domestic anti-corruption and anti-money laundering systems. Even though these statistics can be considered as approximate, it can be confidently stated that ECCD Projects influenced, at a minimum, 27 legislative processes, 35 policy reform/strategy developments and supported addressing of 92 recommendations of monitoring bodies (GRECO and MONEYVAL).

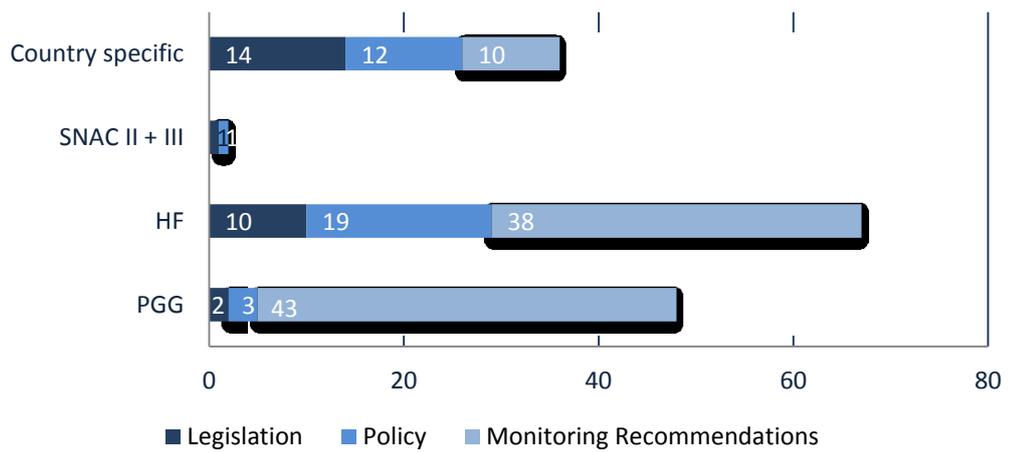
23.1 Overall statistics for 2018



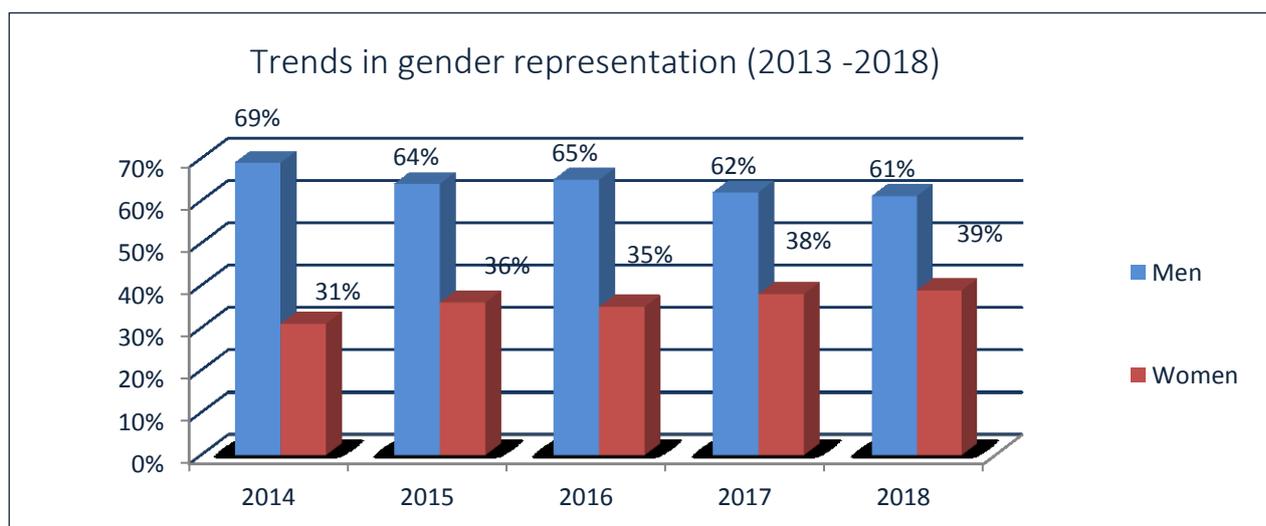
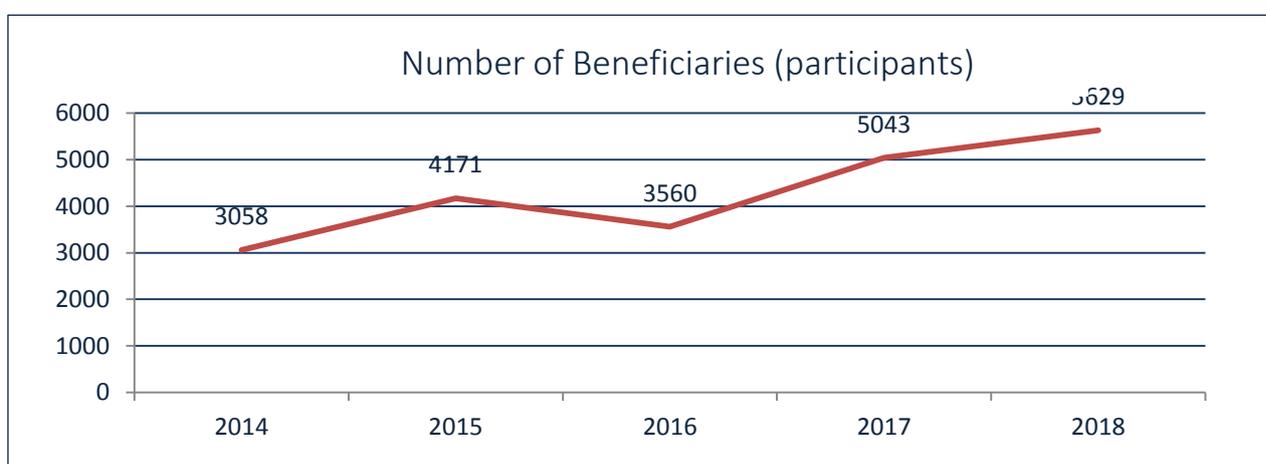
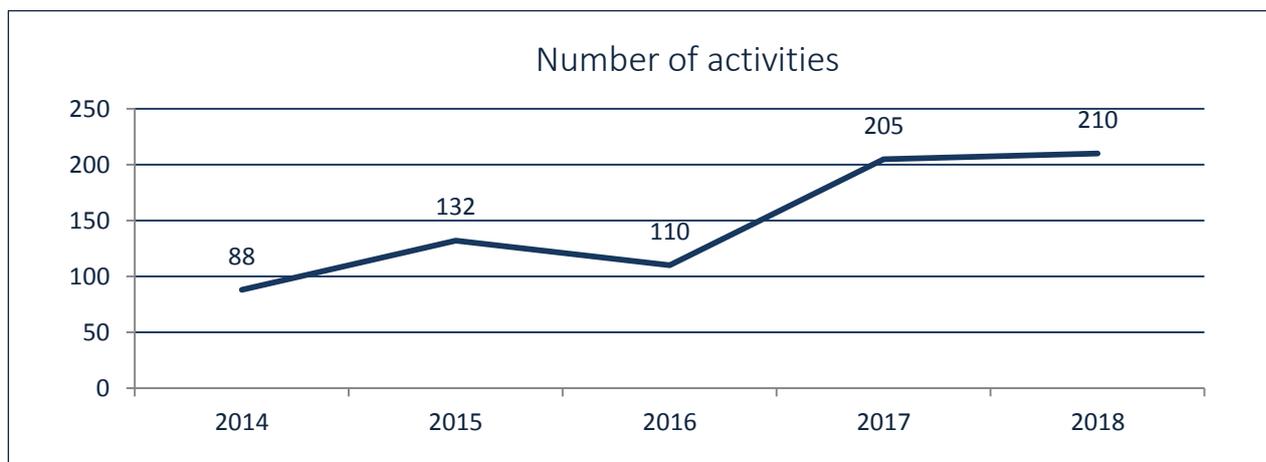
Overall Impact 2018



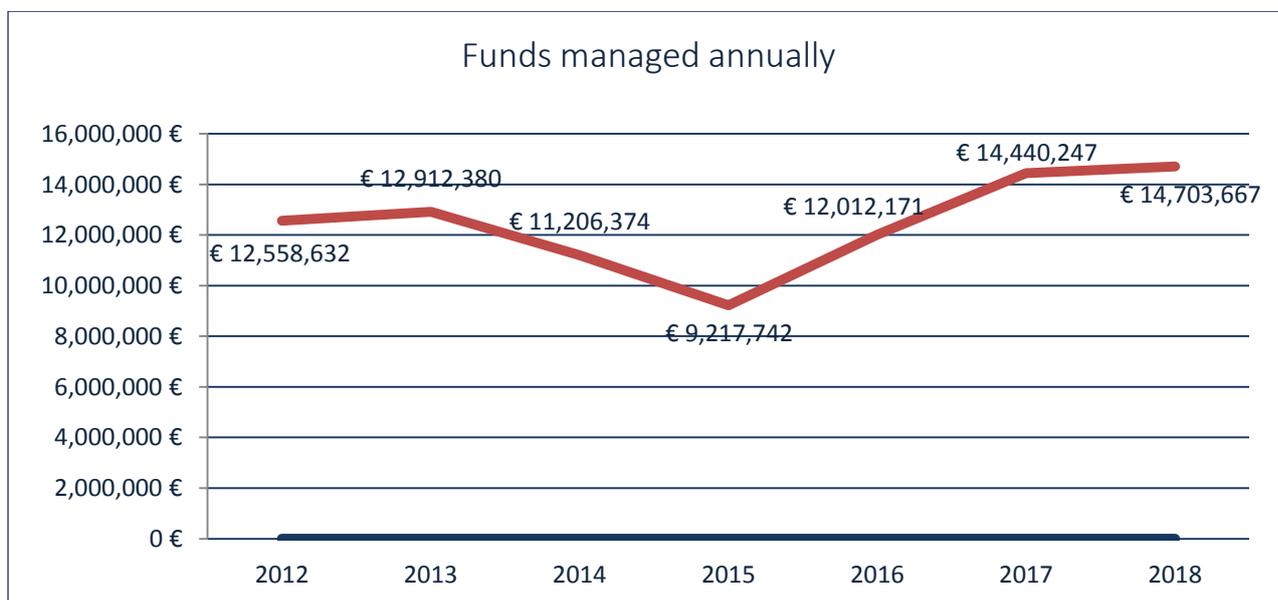
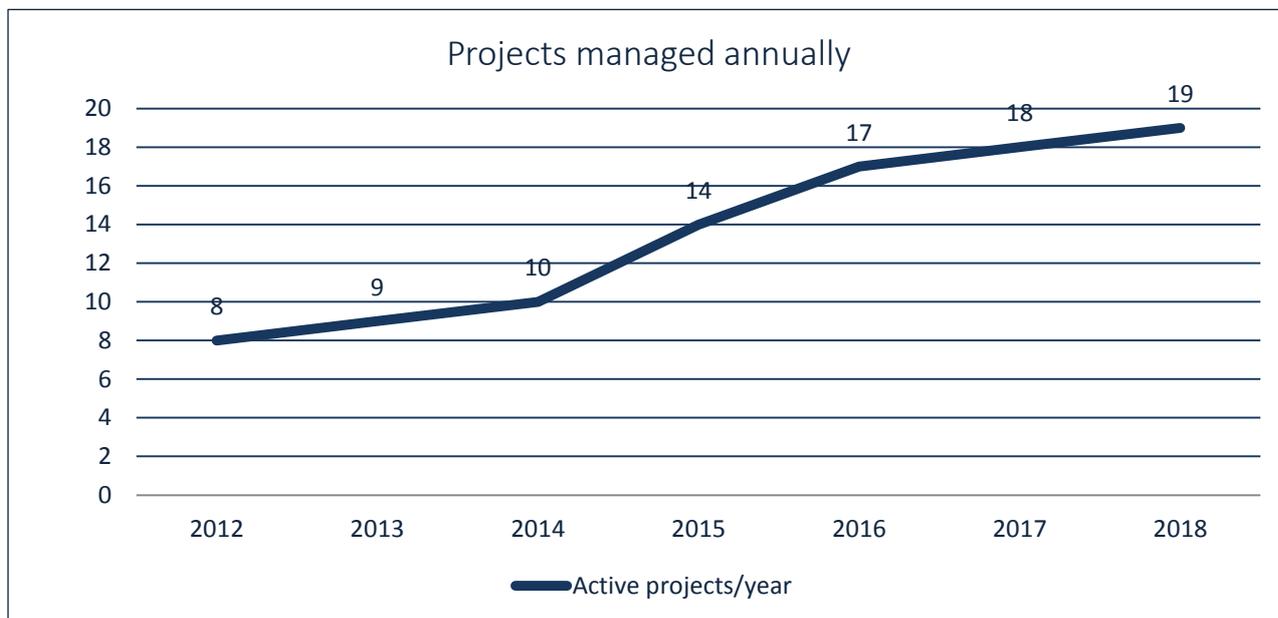
Impact by Programme 2018



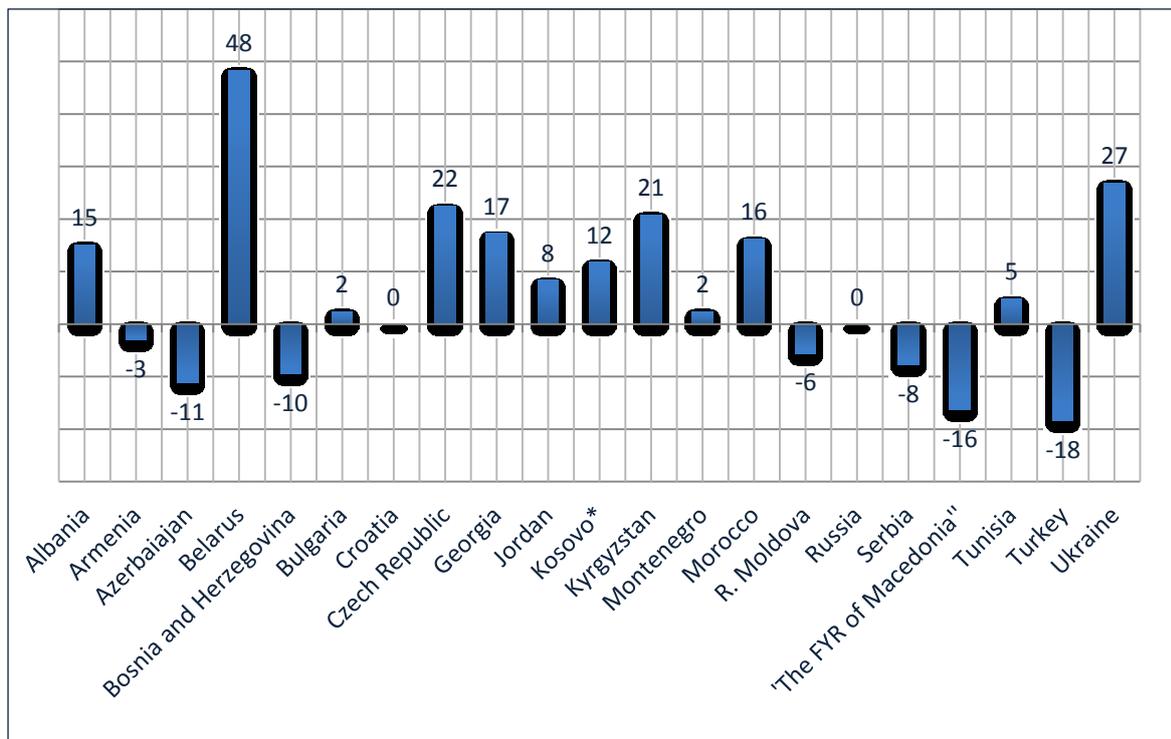
23.2 The Year-on-year evolution of ECCD statistical indicators



23.3 CoE Technical assistance trends (2013-2018)



23.4 Percentage of increase/ decrease in the Transparency International Corruption Perception Index (2013-2018)





**ECCD PROJECT AND ACTIVITY
TESTIMONIALS**

24 TESTIMONIALS

24.1 Action against Economic Crime in Albania

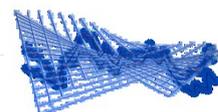


"The Action against Economic Crime in Albania has played a major role in supporting the implementation of key reforms in Albania in a consistent and effective way. At the Anti-money laundering aspect, Action's interventions have enhanced the risk based approach to supervision of anti-money laundering and countering terrorist financing and strengthened the AML/CFT legislation and the asset recovery strategic framework.

Through AEC-AL Albanian institutions have benefited from a highly qualitative technical expertise and assistance which coupled with several workshops, trainings and seminars has substantially raised the inter agency coordination and cooperation and awareness among all actors in the AML/CTF effort including public authorities and partners from the relevant private sector. The General Directorate for the Prevention of Money Laundering and other beneficiaries are fully committed with the implementation of MONEYVAL latest recommendations and AEC-AL is providing key assistance in this respect."

- Mr Arlind Gjokuta, General Director of the General Directorate for the Prevention of Money Laundering

24.2 Action against Economic Crime in Montenegro



Horizontal Facility Retweeted



Ivan Ivanisevic @Cetinjski · Jul 27

New Law on International Restrictive Measures adopted by the [#Parliament of Montenegro](#) today. This was the last procedural step agreed with [#Moneyval](#) and I am happy that [@MFA_MNE](#) contributed further progress in relations with [@coe](#) ! Thank you [@CoE_EU_HF](#) for support!

- Mr Ivan Ivanišević, Director General, Directorate General for Multilateral Relations of the Ministry of Foreign Affairs of Montenegro

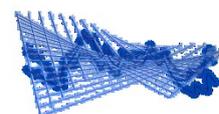
24.3 Action against Economic Crime in Republic of North Macedonia



“... the Action against Economic Crime is a good example of cooperation in the implementation of a project and an example for good coordination between the local project officer, the project staff in Strasbourg and the FIO; ... the project has helped so far in key issues such as legislation, development of strategic documents, roadmap, indicators through workshops, technical papers, guidelines etc.”

- Mr Blazo Trendafilov, Director of the Financial Intelligence Office (North Macedonia) during the National Horizontal Facility Steering Committee meeting on 15 March 2018, Skopje.

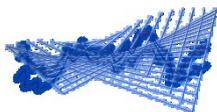
24.4 PGG Azerbaijan



“...86% of the National Action Plan for Promotion of the Open Government (2016-2018) implemented by state bodies;...part of these accomplishments is thanks to the assistance and support of the CoE/EU Joint Project on Strengthening capacities to fight and prevent corruption in Azerbaijan. Support and assistance included: corruption prevention training; awareness-raising activities; development of curriculum on ethical conduct for civil servants and students; establishment of a 75 membership pool of local trainers for various target groups in the regions.”

- Representative of the Commission on Combating Corruption (CCC) during its annual press conference on 18 January 2018, Baku, Azerbaijan

24.5 SNAC 3 Jordan



I have been working as the manager of the International Cooperation team of the Jordanian Integrity and Anti-corruption Commission (JIACC) since 2008; my experience of working with the CoE in SNAC 3 Project proved that the Project team is very professional and the quality and diversity of the Project workplan is excellent. The SNAC Project has been an asset to both my team and the JIACC organization: since 2015, the projects added great value to our work and we have established strong friendship bonds with the Project team. I am very pleased to work with such a professional team

- Dr Kholooud Aloran, Director of International Cooperation Unit of the Jordanian Integrity and Anti-Corruption Commission, on the cooperation with the Council of Europe through the SNAC programme.

24.6 SNAC 3 Morocco



"...2018 has seen the launching of the 3rd phase of our fruitful cooperation program. This time we focused on improving banking sector's knowledge and awareness of corruption issues. A number of training sessions were held which increased the interest and awareness of the participants with regard to anti-bribery and corruption tools and programs. I am confident about the positive impact of these activities and the possibilities they offer to us in our journey of preventing and combatting corruption."

- Mr Yassir Chokairi, Head of Partnership and Development Pole, Central Authority for the Prevention of Corruption of Morocco, on the cooperation with the Council of Europe within SNAC 2 programme

24.7 PECK II – Kosovo*



On the Administrative Instruction on Politically Exposed Persons: “the Support of PECK II Project amongst others in drafting this Instruction is invaluable to our efforts to enhance the legal framework in combating AML/CFT. This Administrative Instruction aims to set up measures to be undertaken in respect to applying enhanced due diligence as well as continuous monitoring of business relationship with politically exposed persons. Moreover, it is in line with (EU) 2015/849 of 20 May 2015 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing”

-Mr Behar Xhema, Deputy Director of Financial Intelligence Unit- Kosovo, on support provided by PECK II Project

24.8 PRECOP II – Russian Federation



“As time shows, the PRECOP II project, aimed at applying anti-corruption methods, is developing in many regions of the Russian Federation and attracts a wider audience every year. The event in Smolensk on corruption and administrative barriers faced by small and medium enterprises on the municipal level, is very important for the business community and the representatives of regional and municipal authorities involved in inspection and supervision activities. Needless to say, the study of anticorruption measures based on international and Russian good practices, performing exercises and analyzing case studies will improve the level of professionalism.”

- Mr Igo Lyakhov, the Chairman of Smolensk Regional Duma, in a letter to Mr Petr Sich, the Head of the Council of Europe Programme Office in the Russian Federation, Smolensk, 13-14 December 2018

25 PUBLICATIONS AND VISIBILITY

During 2018, the Economic Crime and Cooperation Division issued several publications on selected topics in the area of its activity.

The visibility of Council of Europe actions was ensured constantly through combined means of web publications, visual materials and media outreach.

Web publications covered all activities and were made available on the [ECCD website](#), project websites as well as partner institutions.

Key activities were equally reported on the [DGI website](#), social media and CoE field offices. A constant effort was made to provide the information in the languages most accessible to beneficiaries.

Visual material: CoE flags, stationery, roll-ups of CoE and of specific programmes, and leaflets were produced and used throughout project activities to ensure the largest possible reach as well as a clear recognition of the Organisation's role and contribution. A leaflet outlining ECCD activities was prepared and widely disseminated as printed publication and [online](#).

Press releases, communications, addresses to media and interviews strengthened the impact on targeted audiences and ensured a multiplier effect.

The visibility of the Council of Europe activities was confirmed by numerous reports in local and international media covering multiple events.



Samples: (Left-Right) Notepad (CLEP project), Flyer (Beneficial Ownership Conference, Tirana, Albania) and ECCD leaflet.

26 COMPOSITION OF THE ECONOMIC CRIME AND COOPERATION DIVISION TEAM

| | |
|---|---|
| Ardita ABDIU Head of Division | |
| Astrid WERTENSCHLAG Division Assistant | |
| Mustafa FERATI - Head of Unit I Jelena JOLIC – Administrator Maia MAMULASHVILI - Programme Coordinator Zahra AHMADOVA - Programme Coordinator Natia JGENTI - Project Coordinator Jamie BROWN - Project Coordinator Joanna GEBER - Unit Assistant | Igor NEBYVAEV - Head of Unit II Elif SARIAYDIN - Administrator Oxana GUTU – Programme Officer Joana KASHI - Project Coordinator Gaelle JOVANOVSKI – Unit Assistant |

FIELD OFFICES

| | |
|--|---|
| <p><u>Baku</u> Teodora LUKOVIC – Administrator Firuza JAFAROVA - Project Officer</p> <p><u>Kyiv</u> Natalia DRYOMINA-VOLOC- Senior Project Officer</p> <p><u>Moscow</u> Ekaterina ZAKHARYAN- Senior Project Officer Murad TANGIEV – Senior Project Officer Alla DYUBANOVA – Linguistic Assistant Yulia UTENKOVA– Project Assistant</p> <p><u>Podgorica</u> Ana SELIC- Project Officer Marija MERDOVIC – Project Assistant</p> <p><u>Skopje</u> Ilina GAREVSKA- Senior Project Officer Maja KOSTOVA – Project Assistant</p> <p><u>Tbilisi</u> Tea ZARNADZE- Senior Project Officer</p> <p><u>Tirana</u> Liljana KACI- Senior Project Officer Adela METHASANI – Project Assistant</p> | <p><u>Amman</u> Ala ASALI / Manall IDRIZ - National Consultant</p> <p><u>Bishkek</u> Jenishbek ARZYMATOV - National Consultant</p> <p><u>Chisinau</u> Giulia RE - Administrator Nadejda PLAMADEALA - CLEP Senior Project Officer Dimitru BORODA – CLEP Project Assistant</p> <p><u>Pristina</u> Edmond Dunga - Administrator Vlora MARMULLAKAJ - Senior Project Officer Shpend MIFTARI - Project Assistant</p> <p><u>Tunis</u> Amira RIAHI - Senior Project Officer</p> |
|--|---|

27 SEVENTH ANNUAL ECCD TEAM EVENT



Economic Crime and Cooperation Division Annual Meeting

Strasbourg, 28-30 November 2018

The 7th annual Economic Crime and Cooperation Division (ECCD) team event took place from the 28-30 November 2018 in Strasbourg. The event brought together 33 Secretariat members and 3 long term advisers of the Division to benefit from exchange of information and training on new developments concerning cooperation on anti-corruption, anti-money laundering, countering terrorist financing and asset recovery.

Furthermore, special sessions dedicated to the latest developments on CoE's administrative procedures took place. Those sessions included: Legal Advice, Contracting, Granting and Procurement from Directorate of Legal Advice and Public International Law; E-Procurement [New] Tool from the Directorate General of Administration; Project Management Methodology [New] Tools from Office of Directorate General of Programmes; CoE anti-corruption Evaluation from Directorate of Internal Oversight; On-line Communication and Visibility- Web and social media from Directorate General of Human Rights and Rule of law' Digital Communications and Coordination; and Web and Audio-Visual Communication from the Directorate of Communication.

The event allowed for share of good practices, both internally and with other Directorates in CoE, while also providing the possibility for the project teams to share an overview of their respective progress and determine the programming outlook for 2019 in the area of economic crime.

The **Economic Crime and Cooperation Division (ECCD)** is part of the Council of Europe's Action against Crime Department at the Directorate of Action against Crime and Information Society in the Directorate General of Human Rights and Rule of Law (DG I).

The Division is responsible for the Council of Europe's cooperation and assistance activities and reforms concerning:

- good governance,
- corruption,
- ethics and conflict of interests,
- money laundering,
- asset recovery,
- terrorist financing,
- organised crime, and
- mutual legal assistance in criminal matters.

The Economic Crime and Cooperation Division utilises a wide variety of intervention tools, methodologies, and guidance on the implementation of standards and recommendations by involving both in-house expertise and the Council of Europe's database of international and local experts.

www.coe.int/econcrime

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