Strasbourg, 19 March 2025 Greco(2025)6

99th GRECO Plenary Meeting

Strasbourg, 17-19 March 2025

DECISIONS

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Directorate General I
Human Rights and Rule of Law
Directorate of Security, Integrity
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At its 99th Plenary Meeting (Strasbourg, 17-19 March 2025) which was chaired by **David MEYER (President of GRECO, United Kingdom)** and by **António DELICADO (Vice-President of GRECO, Portugal)** for part of the meeting, the Group of States against Corruption (GRECO):

1. noted the opening statement by the **Director General of Human Rights and the Rule of Law, and former Executive Secretary of GRECO, Gianluca ESPOSITO**, who welcomed the sustained engagement of members in GRECO's critical work and the launch in 2025 of GRECO's Sixth Evaluation Round on the theme *Preventing corruption and promoting integrity at the sub-national level;* he also drew attention to the ongoing Council of Europe's process leading to a new commitment to revitalise Democracy as a follow-up to the Reykjavík Declaration, and the place of GRECO's work within that framework;

2. noted the President's welcome message to newly nominated Heads of delegation and representatives, thanking them for their contribution to GRECO's work where their input and coordination at national level facilitate the results achieved by GRECO's monitoring;

3. adopted the agenda of the meeting;

Information

4. took note of the items discussed and decisions taken by the Bureau at its 107th meeting (Greco(2025)5);

5. took note of information provided as follows:

David MEYER, President of GRECO

- the statement made by GRECO's former President, Marin MRČELA on the occasion of International Anti-Corruption Day (9 December 2024) calling for determined action to protect democracy against corruption;

- the President had participated, on the same day, in the OSCE International Anti-Corruption Day Conference *Looking Back and Looking Ahead on the Fight Against Corruption*, contributing to a panel discussion on the critical role of political will in combating corruption and implementing GRECO's recommendations;

- the President's exchange of views with the Venice Commission on the up-date of the Venice Commission's Rule of Law Checklist; there was a clear call from the latter for both bodies to pursue a strong collaboration, in line with their respective mandates; the Secretariat would forward the up-dated Rule of Law Checklist to all GRECO members once it was finalised;

- the Ad hoc (Rule 34) visit to the Slovak Republic had taken place on 18-19 February 2025 and the first in the series of Sixth Round evaluation visits would take place in 2025: Estonia in April, the Slovak Republic in May, Luxembourg in September and Slovenia in November;

- in accordance with decisions previously taken by GRECO, three high-level missions would be carried out in 2025: Denmark in April, Türkiye in June and Poland in September;

- on behalf of GRECO, the President thanked Stéphane LEYENBERGER for his dedicated service as a member of the Secretariat and valuable contributions to the work of GRECO, while extending to him best wishes for the future;

Livia STOICA BECHT, Executive Secretary of GRECO

- the Executive Secretary had participated in several events, including the 23rd Annual Professional Conference and General Assembly of the European contact-point network against corruption (EPAC/EACN)) (Bucharest, 26-27 November 2024) and as a member of the Panel of the OECD Anti-Corruption Research Challenge (online, February 2025);

- the Secretariat had organised a meeting between Secretariat counterparts in the GRECO, OECD, OAS and UNODC anti-corruption mechanisms – to discuss civil society engagement, including the WhatsOn Platform developed by UNODC (online, 23 January);

- the Secretariat's participation in several bilateral and international events: Exchange of views on the rule of law and fundamental rights with the Rule of Law and Fundamental Rights Monitoring Group (DRFMG) established within the Committee on Civil Liberties, Justice and Home Affairs (LIBE) of the European Parliament (online, 30 January); consultations at the request of the European Commission for the preparation of the 2025 Rule of Law report (online, January 2025); the OECD Working Group on Bribery in International Business Transactions (online, 11-14 March); and the Council of Europe's Working Group of the Steering Committee on Democracy elaborating the Parameters for the application and implementation of the Reykjavik Principles for Democracy (December 2024, and March 2025);

- she drew attention to the secondment opportunity in the GRECO Secretariat and the deadline for applications (25 March 2025);

Evaluation procedures

Third Round – Incriminations; Transparency of party funding

6. adopted the Third Round Evaluation Report on:

   - **Kazakhstan** (Greco Eval III Rep(2024)1 – Themes I and II)

   and set the deadline of 30 September 2026 for the submission of a situation report on measures taken to implement GRECO's recommendations;

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

Compliance procedures

8. noted the President's call on all Heads of delegation to strictly respect the submission deadlines fixed by GRECO in each report adopted which was essential to ensure the proper conduct of compliance procedures;

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

9. adopted the 4th *Interim* Fourth Round Compliance Report on:

   - **Portugal** (GrecoRC4(2025)1)

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

10. pursuant to Rule 32, paragraph 2 (i) asked the Head of delegation to provide a report on progress in implementing the outstanding recommendations by 31 March 2026 at the latest;

11. pursuant to Rule 32, paragraph 2 (ii) b), invited the President of the Statutory Committee to send a letter to the Permanent Representative of Portugal to the Council of Europe – with a copy to the Head of delegation - on the need for determined action to be taken with a view to achieving tangible progress as soon as possible;

12. invited the authorities of Portugal to authorise, as soon as possible, the publication of the report mentioned in decision 9 above;

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

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

   - **Azerbaijan** (GrecoRC5(2025)6)
   - **Portugal** (GrecoRC5(2025)7)

   and noted that further progress was necessary to achieve an adequate level of compliance within the next 18 months, and set the deadline of 30 September 2026 for the submission by the respective Heads of delegation of a situation report on additional measures taken to implement the Fifth Round recommendations;

14. invited the authorities of Azerbaijan and Portugal to authorise, as soon as possible, the publication of the reports mentioned in decision 13 above;

15. adopted the 2nd Fifth Round Compliance Reports on:

   - **Albania** (GrecoRC5(2025)5)
   - **Norway** (GrecoRC5(2025)4)

   and closed the Fifth Round compliance procedure in respect of these members;

16. adopted the 2nd Fifth Round Compliance Report on:

   - **Germany** (GrecoRC5(2025)8)

   and within the meaning of Rule 31 revised bis, paragraph 10, concluded that this member was **not in sufficient compliance** with the Fifth Round recommendations;

17. pursuant to Rule 32 revised, paragraph 2 (i) asked the Head of delegation to provide a report on progress in implementing the outstanding recommendations by 31 March 2026 at the latest;

18. in accordance with Rule 32 revised, paragraph 2 (ii) b), invited the President of the Statutory Committee to send a letter to the Permanent Representative of Germany to the Council of Europe – with a copy to the Head of delegation – on the need for determined action to be taken with a view to achieving tangible progress as soon as possible;

19. noted with satisfaction that the authorities of Albania authorise the publication of the report mentioned in decision 15 above;

20. invited the authorities of Norway and Germany. to authorise, as soon as possible, the publication of the reports mentioned in decisions 15 and 16 above;

21. adopted the Addenda to the 2nd Fifth Round Compliance Reports on:

- **North Macedonia** (GrecoRC5(2025)1)
- **Sweden** (GrecoRC5(2025)3)
- the **United Kingdom** (GrecoRC5(2025)2)

and closed the Fifth Round compliance procedure in respect of these members;

22. adopted the Addenda to the 2nd Fifth Round Compliance Reports on:

- the **Netherlands** (GrecoRC5(2025)9)
- **Poland** (GrecoRC5(2025)10)

and within the meaning of Rule 31 revised bis, paragraph 10, concluded that these members were **not in sufficient compliance** with the Fifth Round recommendations;

23. pursuant to Rule 32 revised, paragraph 2 (i) asked the respective Heads of delegation to provide a report on progress in implementing the outstanding recommendations by 31 March 2026 at the latest;

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

25. invited the authorities of North Macedonia, Sweden, the United Kingdom, the Netherlands and Poland to authorise, as soon as possible, the publication of the reports mentioned in decisions 21 and 22 above;

<u>Sixth Evaluation Round – Training of Evaluators</u>

26. took note of and welcomed:

- the arrangements made, as well as the format and Programme for the training of evaluators (Strasbourg, 20-21 March 2025);

- the Guidelines for GRECO Evaluation Teams (GrecoEval6(2025)2) and the Guidelines/Time Schedule for the organisation of the evaluation visits (GrecoEval6(2025)1) that will be released after the training session;

Gender Equality Rapporteur

27. appointed, as proposed by the Bureau, Vita HABJAN BARBORIČ (Head of delegation – Slovenia) as GRECO's Gender Equality Rapporteur for the Sixth Evaluation Round;

Thematic paper on Access to Information

28. took note of and welcomed the thematic paper on Access to Information prepared by the Secretariat;

General Activity Report (2024)

29. adopted its General Activity Report 2024 (Greco(2025)1-fin);

30. noted that the report would be presented by GRECO's President to the Committee of Ministers of the Council of Europe at the 1527th Meeting of the Ministers' Deputies (Strasbourg, 30 April 2025) and made public shortly after;

Engagement with Civil Society

31. welcomed and adopted, with the changes agreed in the plenary, the Bureau's revised proposals to further improve GRECO's engagement with civil society (Greco(2025)3-fin) notably, with national associations of local and regional authorities as foreseen in the Sixth Evaluation Round, and the inclusion of civil society intervenors in the programme for the training of Sixth Round Evaluators;

32. also in pursuit of the above policy, GRECO welcomed the arrangements being made for an outreach event aimed at a wide audience to be held alongside the 100th Plenary Meeting in June 2025; national and international non-governmental organisations playing a major role in the fight against corruption would be invited to participate online in an exchange with GRECO delegations; and a thematic study on the findings from the Fifth Evaluation Round would be presented by its authors;

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

33. at its 107th meeting, the Bureau had agreed that this regular agenda item continues to be valuable for information provided by delegations on their own initiative, or in response to a request from GRECO, the Bureau or the President regarding specific issues of concern or good and promising practices;

34. took note of information provided at the request of the Bureau by the Delegations of Cyprus,[1] Hungary,[2] Italy,[3] the Republic of Moldova[4] and the Slovak Republic[5] as well as the information shared by Finland[6], Portugal[7], Türkiye and Ukraine;

35. invited Delegations that wished their presentations to be distributed to all GRECO members to send them to the Secretariat by the end of the week;

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[1] On the good practice of forming an ad-hoc committee – with the participation of the Head of delegation in GRECO – to manage the implementation of the Fifth Round recommendations to Cyprus.

[2] On the situation arising from the police raid on the offices of the Integrity Authority.

[3] On proposed judicial reforms and their consequences on the careers of judges and on the High Council for the Judiciary.

[4] On proposed reforms to merge the Anti-Corruption Prosecutor's Office and the Prosecutor's Office for Combatting Organised Crime and Special Cases.

[5] An update on developments concerning information provided in November 2024.

[6] Including a call to other members to share their experience and good practices on designing a national system to measure perceptions and prevalence of corruption.

[7] On good practice of engagement with civil society.

Information from observer organisations and Council of Europe bodies

36. welcomed with interest the information provided by the representative of the European Union concerning the elaboration of the 2025 Rule of Law Report, the development of a second external study on risk mitigating measures - following the publication of the mapping on High risk areas of corruption in EU member States - whose preliminary findings will be presented at a seminar in June 2025; as well as plans to update the EU's legislative framework on anti-corruption and the preparation of an EU-wide anti-corruption strategy;

Publication of Reports[8]

37. called on the authorities of the member States concerned to authorise without further delay, and in line with the long-standing practice, the publication of reports previously adopted by GRECO;[9] the President particularly urged the following delegations to authorise publication rapidly: Azerbaijan (report from March 2023), Spain and Türkiye (reports from December 2023);

38. noted the added benefit of the prompt publication of reports so that progress can be reflected in the statistics and tables produced in GRECO's annual General Activity Reports;

[8] *Action to be taken when publishing adopted reports* (decision 26, GRECO 58):
- agree a same-day publication date with the Secretariat
- clearly mark both the date of adoption and date of publication on the cover page
- make the national language version available and easily accessible on a domestic website
- notify the Secretariat of the location of the report by communicating the internet link to it
- include a link on the domestic website to the official language versions on GRECO's website.

[9] **Adopted in March 2023:** Fifth Round Evaluation Report on Azerbaijan; **adopted in December 2023:** Fifth Round Evaluation Report on Türkiye, 2nd Fifth Round Compliance Report on Spain; **adopted in June 2024:** Fifth Round Compliance Report on Hungary, 2nd Addendum to the 2nd Fourth Round Compliance Report on Spain; **adopted in November 2024**: Fifth Round Evaluation Report on Liechtenstein, Fourth Round 2nd Compliance Report on Hungary, Fourth Round 5th Interim Compliance Report on Türkiye and Fourth Round 3rd Interim Compliance Report on Czechia.

Any other business

39. noted the following reminders by the President:

- that delegations are appointed on a permanent basis (Rule 3); only designated representatives attend plenary meetings; it was very important that changes to a delegation are promptly communicated by the Head of delegation to the Secretariat in order to keep the List of Representatives and corresponding mailing lists up to date;

- the essential collective expertise of the Plenary for the examination of the evaluation and compliance reports, and the finalisation of policy documents and decisions; the presence of all Delegations throughout the Plenary meetings was therefore very important;

- evaluation reports are fixed items in the order of business, but it had always been necessary to operate with more flexibility for the examination of compliance reports and other agenda items – the length and scope of discussions cannot be anticipated and accommodating individual timing requests from delegations is particularly challenging, and was to be avoided;

- the confidential nature of GRECO's procedures and plenary discussions is laid down in GRECO's Statute and Rules of Procedure and it was therefore inappropriate to make public declarations regarding the content of discussions held or to be held in the plenary, as this compromises the decision-making process;

Future meetings

40. took note of the following dates:

- **108th Bureau Meeting**: Online, 28 April 2025

- **100th Plenary Meeting**: Strasbourg, Tuesday 3 June – Friday 6 June 2025 (midday) – **in person only**

- **101st Plenary Meeting**: Strasbourg, Tuesday 18 November – Friday 21 November 2025 (midday) – **in person only**.