

LOCAL SELF-GOVERNMENTS IN MONTENEGRO IN FIGHT AGAINST CORRUPTION

*Report on implementation of local action plans for fight against corruption
in 14 Montenegrin municipalities in the period 2009-2012 and 2013-2014*



The project is financed by the EU and co-financed by the Royal Norwegian Embassy



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INTRODUCTION

The problem of corruption is one of the most prevalent issues in the Montenegrin public discourse, whereas the fight against corruption is one of the priorities of the state institutions, judging by strategic documents and statements of the officials. As service providers and institutions responsible for the common interest of citizens, local self-governments are particularly vulnerable to corruption. The effects of corruption at the local level cause not only the stagnation of the economy, but also increased unemployment rate, decrease of trust in administration and so on.

Recognizing the need for stronger involvement of civil society organizations in this field, a project titled „**Corruption at the local level- zero tolerance**” has been initiated. It has been implemented by the Centre for Civic Education (CCE) in cooperation with the Institute Alternative (IE), NGO Bonum from Pljevlja and NGO Nada from Herceg Novi, with the support of the Delegation of the EU to Montenegro through IPA 2011 and co-financing of the Royal Norwegian Embassy. In line with the criterion of balanced representation of the northern, central and southern parts of the country, the project encompasses 14 Montenegrin municipalities: Bar, Budva, Cetinje, Danilovgrad, Herceg Novi, Kolašin, Kotor, Mojkovac, Nikšić, Pljevlja, Plužine, Podgorica, Rožaje and Tivat.

The intention of the authors of the monitoring report covering the period of implementation of the Local Action Plans for the fight against corruption (LAP) from 2009 to 2014 was to review the heretofore results in this field, provide an overview

of implementation of the action plans, point out to problems and oversights which occurred during the implementation and planning, as well as to present useful recommendations for improving future local action plans.

THE BASIS FOR THE FIGHT AGAINST CORRUPTION AT THE LOCAL LEVEL

The innovated Action Plan from 2008 for implementation of the National Program for fight against corruption and organized crime from 2005, for the first time introduces activities which relate to local self-government with the aim to combat corruption and organized crime at the local level, i.e. which relate **to drafting of local action plans for fight against corruption**. In particular, in order to improve the fight against corruption at the local level it was planned to develop and adopt a Model of the Program of fight against corruption and organized crime in local self-government and Action Plan for prevention and combating corruption at the local level. Therefore, envisaged was development and adoption of local anti-corruption plans which would fall under the responsibility of local self-governments, and which have not been included in the Program for fight against corruption and organized crime and the Action Plan for its implementation.

In 2008, the Government of Montenegro adopted the Model of the Program of fight against corruption and organized crime in local self-government and Model Action Plan. At the session held on July 9, 2008 the Government directed the Ministry of Interior to **establish a Commission** to monitor the implementation of the Action Plans for fight against corruption in the local self-government by the end of the fourth quarter of 2008, which would based on reports from municipalities **prepare semi-annual reports** on implementation of the measures, and **submit to the Government and National Commission** for fight against corruption and organized crime **annual reports on implementation of activities**.

Strategic objectives, measures, activities, implementers, timeframe and success indicators of the implementation of the measures for fight against corruption at the local level have been set forth in the **Strategy for fight against corruption and organized crime for the period 2010-2014 and the innovated Action Plan for implementation of the Strategy** from July 2011. The objectives stipulated herein are: harmonization of local action plans for fight against corruption with sectoral action plans and this Strategy; monitoring of these plans; improving of the level of responsibility and professionalism at the local self-government level; strengthening of control of the work of local self-government units; transparency in the process of planning, adoption and implementation of regulations.¹ Later, the **Action Plan for implementation of the Strategy for fight against corruption and organized crime** for the period **2013 -2014** envisaged an obligation to harmonize local action plans with the new document. For the achievement of the aforementioned objectives, a Working group has been established; it was comprised of the representatives from the Ministry of Interior, Union of Municipalities, local self-government and Directorate for Anti-Corruption Initiative and it worked on drafting of the *Model of the harmonized action plan for fight against corruption in local self-government for the period 2013 - 2014*.

¹ Strategy for fight against corruption and organized crime for the period 2010 - 2014, p. 32.

LOCAL ACTION PLANS FOR THE FIGHT AGAINST CORRUPTION (2009 – 2012)

Local anti-corruption documents for the period 2009 – 2012 have been based on the **Model of Program of fight against corruption in the local self-government (MP)** and **Model Action Plan of the Program of fight against corruption (MAP)**. The following institutions were involved in drafting of the documents: Ministry of Interior and Public Administration, Police Directorate, Union of Municipalities, representatives of non-governmental organizations Centre for Development of Non-Governmental Organizations (CRNVO) and Network for Affirmation of NGO Sector (MANS), with expert assistance from Council of Europe.

The municipalities, encompassed by the project, had an almost uniform structure of strategic and operational goals in drafting of LAPs and followed the MAP. Beside minor differences in operational goals and activities, **the most common structure** of the Program and Action plans for 14 Montenegrin municipalities² was the following:

Strategic objective No. 1. Improve legislative framework in the local self-government- whereby this objective usually consists of two operational objectives, and these are: a) *to empower the interested parties to increase the level of responsibility of local self-government* and b) *to increase the ability of citizens to increase the level of responsibility of local self-government*). Activities mainly relate to production and distribution of manuals, trainings/seminars, etc.

² Bar, Budva, Cetinje, Danilovgrad, Herceg Novi, Kolašin, Kotor, Mojkovac, Nikšić, Pljevlja, Plužine, Podgorica, Rožaje and Tivat

Strategic objective No. 2. Raise the level of professionalism of the employees- in most of the municipalities there are four operational objectives, and these are: a) *to create mechanisms for raising the degree of independence of the employees*, b) *to develop professional capacities of employees*, c) *to develop capacities of elected representatives and employees*, d) *to increase the level of ethical behavior of elected representatives and employees*. Main activities are: improving financial position of the employees, selection of the best civil servants, introducing monitoring of employment, conducting trainings on public ethics, introduction of the system of evaluation of employees, establishment of the Council for development of local self-government, adoption of the Code of Ethics.

Strategic objective No. 3. Increase transparency of work of the local self-government and operational objectives are a) *to increase transparency of work of local self-government and to simplify the procedures* and b) *to increase the opportunities for the citizens to influence the quality of service delivery*. The most common activities are: establishment of information center, conducting researches, publishing of brochures, publication of regulation, training of councilors for dialogue with citizens, etc.

Strategic objective No. 4. Strengthen internal and external control of the Municipality – with two operational objectives: a) *to systematize and strengthen the effective and efficient internal control mechanisms*, b) *to systematize and strengthen effective and efficient external control mechanisms*. Main activities are: preparation of the budget execution reports, preparation of the report of the Commission for distribution of funds to NGOs, submission of the audit of the final budget statements with the proposal of final budget statements, preparation of semi-annual report on implementation of the Law on Free Access to Information, publishing of the Report on investment plan of the municipality, etc.

Strategic objective No. 5. Create preconditions for implementation of the Action Plan for fight against corruption in the local self-government (2009-2012) – operational objective is: *to create institutional mechanisms*. Activities: informing the citizens about the adoption of the Program and Action Plan, establishment of the working group for monitoring of its implementation, preparation of reports.)

And in a few municipalities only – **Strategic objective No. 6.** Improve cooperation with local media.

The reports and forms on implementation of the action plans of local self-government, the project team received from the municipalities encompassed by the project (and which relate to the period 2009 – 2012), indicate that reporting to Commission was inconsistent, both in terms of the reporting dynamics and in terms of the content of information provided in these forms. Due to the poor reporting by municipalities the Commission's report contains only the most basic information and it fails to provide adequate insight into substantive progress in implementation of the Action Plans and effects of implemented activities. The conclusions of the Commission focused on setting of deadlines to municipalities for submission of new reports, inviting for harmonization with national Action Plan for implementation of the Strategy of fight against corruption and organized crime.

Tabular presentation by municipality follows below, which clearly shows that a single method of research for formulation of critical areas has not been utilized, as well as that the sheer number of activities does not necessarily affect the level of implementation. Also, it is evident that MAP was strictly followed in almost all LAPs, and strategic objectives, operational objectives, number of activities, etc. failed to take into account the specificities of different municipalities.

Municipality	Pre-testing method	Number of strategic objectives	Number of operational objectives	Number of activities	Level of implementation
1) Bar	Poll	5	11	45	67.80%
2) Budva	N/A	6	12	47	69.56%
3) Danilovgrad	Poll	5	11	48	86.30%
4) Capital city – Podgorica	Focus groups	4	10	50	88.8 %
5) Herceg Novi	Poll	5	10	40	82.92%

* Source: Commission for monitoring of implementation of Action Plans - for more details: Analysis of the functioning of local self-governments in Montenegro, p. 76

6) Kolašin	Situation analysis/Poll	5	10	49	66.00%
7) Kotor	Poll	5	11	51	100%
8) Mojkovac	Poll	6	9	43	53.33%
9) Nikšić	N/A	5	11	51	89.8%
10) Plužine	Situation analysis/Poll	5	11	46	66.70%
11) Pljevlja	Situation analysis	5	11	39	5.20%
12) Old Royal Capital–Cetinje	Situation analysis/Poll	5	8	13	50.00%
13) Rožaje	Situation analysis	5	11	44	14.80%
14) Tivat	Situation analysis/Poll	5	9	47	97.05%

SPECIFICS OF LOCAL ACTION PLANS AND IMPLEMENTATION DYNAMICS (2013 -2014)

Based on the Action Plan for implementation of the Strategy for the fight against corruption and organized crime for the period 2013-2014, with an obligation to harmonize local action plans with the new documents, a Working group was formed which was composed of the representatives from the Ministry of Interior, Union of Municipalities, local self-government and Directorate for Anti-Corruption Initiative. It worked on preparation of the new model - *Model of harmonized action plan for the fight against corruption in the local self-government* for the period 2013-2014. Apart from the aforementioned strategic documents, for preparation of the new model they also used Model of fight against corruption in local self-government in the field of spatial development, as well as some important laws aiming at fighting corruption at the local level.³

Strategic objective	Total No. of measures	Total No. of activities
Increased level of responsibility and professionalism in local self-government	15	39
Increased transparency in planning process, adoption of laws and their implementation while respecting the principle of participation	7	19
Increased internal and external control of the local self-government	6	16
Strengthening of the integrity of local self-government units and application of ethical standards in local self-government	6	14
Creation of conditions and enticing civil and private sector to get involved in the fight against corruption at the local level	3	8
Monitoring of the local action plan for fight against corruption	3	7

³ Law on Amendments to the Law on Local Self-Government, the Law on Amendments and Changes to the Law on Spatial Development and Construction of Structures, Law on Civil Servants and State Employees, Law on the Improvement of the Business Environment, Law on Free Access to Information, etc.

Harmonized Model of AP sets forth six strategic objectives, which entail 40 measures and 103 activities. Planned activities, grouped by strategic objectives, inter alia, foresee: drafting and adoption of spatial urban development plans of municipalities; analysis of municipal regulations regarding the procedures and ensuring of functioning of one-stop shop in order to create a favorable environment for business development and elimination of business barriers; development of guides for free access to information; establishment of the civic office; establishment of the system for evaluation of work performance and system of promotion and remuneration in line with the work performance; affirmation of the „empty seat“ institute in work of local self-governments, etc.

Strategic objectives for fight against corruption during 2013 and 2014 have been well defined in the Model AP, but the document does not include all the measures which would entail all areas of the high risk of corruption. This, of course, did not have to be restrictive for local self-governments, as regards including specific measures and activities in each of the municipalities. However, all municipalities that have so far developed action plans have adopted almost uniform documents. Therefore, the problems which existed in earlier forms of local action plans (2009-2012) are also present in the newly adopted documents. The activities are mainly focused on preparation of various analyses and training plans, and much less on concrete tasks directed towards prevention of the risk of corruption.

The activities of local self-governments in the fight against corruption during 2013 were limited to drafting and adoption of the new action plans. Namely, the Commission for monitoring of implementation of the measures from the Action plans for fight against corruption at the local level states in its Report that the Report for 2012 was adopted in March, and at that time Ministry of Interior was entrusted with coordination of activities in fight against corruption at the local level. Only in May drafting of Model AP has started. Due to such coordination of activities, local self-governments have begun working on the action plans only in June, and they could have been adopted in July at the earliest. This actually means that municipalities have been for more than half a year without a valid framework for fight against corruption, and that for most of 2013 no

planned activities have been implemented in this field.

An exception, at least formally, represents municipality Herceg Novi, which has in September 2013 prepared a Report on the work of the Commission for monitoring of implementation of the Action plan for fight against corruption in Municipality Herceg Novi (2009- 2012) for 2012 and the first half of 2013. Also, it should be noted that this document lists the activities which have not been conducted in the reporting period: preparation of the Manual for NGOs on good practices in the fight against corruption; preparation of the local newsletter on improving the transparency of the performance of municipal services; publishing of a local newsletter on work of local self-government bodies, etc. The same document also mentions that establishment of procedures related to transparent work of administration bodies would be realized through „Project for introduction of quality management in the work of administration bodies“; as well as that the other unrealized or partially realized activities will be realized though the activities foreseen with the adoption of the new Action Plan.⁴

Table providing an overview of municipalities which have adopted Action Plans for fight against corruption is presented below:

Number	Municipality	Adopted AP for fight against corruption	Remarks
1.	Bar	YES	AP is available on the website
2.	Budva	NO	Draft AP is available on the website
3.	Cetinje	YES	Draft AP is available on the website
4.	Danilovgrad	YES	Draft AP is available on the website, as well as proposal of the decision for adoption of the AP
5.	Herceg Novi	YES	AP is available on the website
6.	Kolašin	YES	Draft AP is available on the website
7.	Kotor	YES	AP is available on the website
8.	Mojkovac	YES	AP is available on the website
9.	Nikšić	YES	AP is available on the website
10.	Plužine	YES	AP is available on the website
11.	Pijevlja	YES	AP is available on the website
12.	Podgorica	YES	AP is available on the website
13.	Rožaje	NO	Draft AP is available on the website
14.	Tivat	YES	Draft AP is available on the website

⁴ Report on the work of the Commission for monitoring of implementation of the Action Plan for fight against corruption in Municipality Herceg Novi (2009-2012) for 2012 and the first half of 2013, p. 7.

Bar

Working group for drafting of the Action Plan for fight against corruption in Municipality Bar was formed on March 21, 2013.⁵ Action Plan for fight against corruption for this municipality contains 38 measures and 98 activities. The strategic objectives under which measures and activities are defined within this document follow those from the Model AP. Financial resources necessary for realization of AP are not precisely defined, but it is stated that „they would be provided from the Budget of the Municipality, depending on specific activities foreseen by this document.”⁶ Out of 98 activities, only five have precisely defined timeframe for realization, whereas in most of the columns in which timeframe for realization of activities should be given it is stated that implementation of activity is „continuous“. Also, in the column „implementer of the activity” mentioned are „local self-government bodies” and „other subjects“, i.e. there is no precisely defined body/entity for implementation of planned activities. Having in mind the number of activities, set deadlines and implementers, we can conclude that the AP for Municipality Bar has been completely copied and that the only difference between the Model AP and AP of Municipality Bar is that measures 39 and 40 are missing. The problem of corruption in spatial development is treated through measures: no. 1 *Implementation of the Law on Spatial Development and Construction of Structures*, no. 2 *Identification of problems in appliance of the laws and other regulations in the field of spatial development and construction of structures* and no. 3 *Determining the situation in the spatial planning and undertaking of preparatory activities for implementation of the Law on Legalization of Informal Structures*. The problem of corruption in employment is solely dealt with measure no. 14 *Existence and implementation of clear procedures for employment in local self-government and engagement of competent persons for*

⁵ Mayor of Municipality Bar has appointed the Working group by the Decision No. 031-367 from 21. 03. 2013.

⁶ Action Plan for fight against corruption for Municipality Bar (2013-2014)

carrying out of tasks which are under responsibility of Municipality. Public procurement is mentioned in measures no. 24 *Conducting of budgetary control* and no. 26 *Efficient and effective management of public procurement*. Problem of political corruption, work of the local assembly and public-private partnerships are not mentioned in the AP. Having in mind that the AP is not adapted to the specifics of the municipality and that no research/analysis has been conducted prior to drafting of the AP, no improvements can be noted in relation to the AP for 2009-2012.

Budva

Action Plan for fight against corruption of Municipality Budva *has still not been adopted*. Draft AP for 2014 is available at the website of Municipality, and it defines six strategic objectives, 35 measures and 96 activities. The deadline for implementation of activities is accurate to the extent possible, however, a large number of activities have been planned over-ambitiously and the deadlines have already been exceeded, especially having in mind that the AP has not yet been formally adopted. For example, there are 18 activities with the deadline set for the first half of 2014 or I and II quarter of 2014. Working team, which was duly listed on the last page of the AP, made an effort to adjust the AP to the needs of the municipalities, and in that regard we have a plan that follows the guidelines of the Model AP but also acknowledges the specificities of the municipality. Implementers are precisely defined, whereas for the financial resources it is stated that: “Funds for realization of AP BPK shall be provided from the budgets of implementers of activities for 2014 as well from donations in the estimated amount of approximately 550,000.00 EUR.”⁷

Cetinje

The Action Plan for fight against corruption for Old Royal Capital Cetinje does not specify the composition of the working team

⁷ Draft Action Plan for fight against corruption for Municipality Budva for 2014 - http://new.budva.me/sites/default/files/PDF/Rasprave/12_12_2013_Nacrt-borbu-protiv-korupcije.pdf

responsible for preparation of this Plan, and therefore, it cannot be determined who participated in drafting of the Plan, nor to what extent were stakeholders involved. This Plan almost entirely follows the objectives, measures, activities, indicators and deadlines stipulated in the Model of the harmonized Action Plan for fight against corruption in local self-government, and for that reason there are inconsistencies in relation to set deadlines. Namely, the AP for fight against corruption of the Old Royal Capital Cetinje on two occasions sets *II quarter of 2013* as a deadline, which is contrary to the date of the adoption of the document- September 2013. Similarly, the deadline is almost in all cases continuous, and only 7 out of 89 activities have a precisely prescribed deadline. Unlike the Model AP, in this document the problem of spatial development is treated also through measure no. 2 *Implementation of the Law on Environmental Impact Assessment, Law on Strategic Environmental Assessment, Law on Protection of Nature and Law on Environment*. The problem of corruption in employment and public procurement is treated in accordance with the Model AP, whereas the problems of political corruption, work of the local assembly and public-private partnerships are not mentioned. The budget for implementation of activities from AP is provided from the Budget of the Old Royal Capital: „Financial resources needed for implementation of this Action Plan for fight against corruption shall be provided from the Budget of the Old Royal Capital, depending on the concrete activities foreseen by this document.”⁸

Danilovgrad

Working group for drafting and monitoring of the Action Plan for fight against corruption in Danilovgrad was appointed by the Mayor of this municipality on June 12, 2013. This group has, like other working groups from other municipalities, prepared the Action Plan relying entirely on Model of the harmonized action plan for fight corruption in the local self-government. The Plan contains 38 measures and 97 activities, and deadlines prescribed for realization of measures and activities from this Action Plan are imprecisely defined, i.e. only 8

⁸ Action Plan for fight against corruption for Old Royal Capital, for the period 2013-2014

out of 97 activities have generally defined timeframe. As well as in previous action plans, the budget needed for implementation of AP was explained by one sentence only: „Financial resources necessary for implementation of the Action Plan will be provided from the Budget of Municipality, depending on the concrete activities foreseen by this document.”⁹

Herceg Novi

In addition to the strategic objectives defined in the Model AP, municipality Herceg Novi has defined the seventh strategic objective- *Cooperation with international organizations to strengthen anti-corruption methodology in preparation for drafting of the Action plan for fight against corruption in the period from 2014 to 2018*. Explanation provided in relation to this strategic objective is as follows: „In the framework of implementation of this strategic objective it is necessary to improve cooperation of the municipal bodies with citizens, NGOs and private sector in fight against corruption, to organize joint meetings in order to familiarize them with the importance of involvement in the fight against corruption, to organize joint activities in implementation of measures set forth in the Action Plan for fight against corruption.”¹⁰ Within this strategic objective there is activity no. 80 *Signing of Agreement on cooperation with the consulting company with defined roles, duties and activities and deadlines regarding implementation of the project*. Unlike the other local self-governments, Municipality Herceg Novi has provided in more details all of the strategic objectives in the introduction of the AP. AP consists of 41 measures and 101 activities. However, there is no explanation regarding the necessary budget for implementation of the activities. AP has to a large extent (as is the situation with other municipalities) followed the Model AP, so there are no activities defined for fight against corruption in the areas of political corruption, public-private partnerships and the work of the local assembly. The problem of corruption in public procurement,

⁹ Action Plan for fight against corruption for Municipality Danilovgrad (2013-2014)

¹⁰ Action Plan for fight against corruption in local self-government for Municipality Herceg Novi (2013-2014) p. 6

employment and spatial planning has been treated in line with the Model AP.

Kolašin

Action Plan for fight against corruption of Municipality Kolašin has 39 measures and 97 activities. It almost completely follows the Model of harmonized action plan, and for that reason we can find some discrepancies concerning deadlines set for implementation of activities. Thus, in the measure no. 23: „*Establishment of the efficient and transparent system of internal control of the work of local administration and other identified implementers of specific activities*“ it is stated that the deadline for completion of the activities is set for „*second quarter of 2013*“, and the Action Plan was adopted in September 2013. Therefore, it is clear that the deadlines were not adequately considered, and additionally 7 of 39 activities have an approximate deadline (as provided in Model AP), and the deadline for other activities is defined as „*continuous*“. This AP also fails to treat fight against corruption in the area of political corruption, public-private partnerships and work of the local assembly. The problem of corruption in public procurement, employment and spatial development is treated in the same way as in the Model AP. As in the previously analyzed action plans, regarding the budget needed for implementation of the AP, there is a short explanation that it will be provided from the Budget of the Municipality.

Kotor

The Working group that worked on drafting and monitoring of implementation of the Program for fight against corruption and the Action Plan for fight against corruption for 2009- 2013 has prepared a new AP for Municipality Kotor. The Plan contains 39 measures and 97 activities, and they all fall within the same strategic objectives as those defined in the Model AP. The deadline for implementation of 37 activities is specified as *continuous*. The Model AP has been almost entirely followed, and as was the case with the other municipalities, the problem of corruption in public procurement, employment and

spatial development is treated in accordance with the Model AP, and the fields of political corruption, public-private partnerships and work of the local assembly have been left out. Additionally, as is the case in the previous APs, the budget needed for implementation of the AP is explained in one sentence only stating the funds would be provided from the Budget of the Municipality.

Mojkovac

Action Plan for fight against corruption of the Municipality Mojkovac almost entirely copies the objectives, measures, activities and indicators from the Model AP. Thus, AP has 6 strategic objectives, 33 measures and 68 activities. The deadline for 30 activities is *continuous*, whereas for two activities there is no specified deadline. Model AP has been almost entirely copied in the AP of this municipality, and as with the previously analyzed action plans, there is only a brief statement noting the financial resources necessary for implementation of the AP would be provided from the Budget of the Municipality.

Nikšić

The Action Plan for Municipality Nikšić has been adopted on November 26, 2013. AP contains 35 measures and 72 activities and it was adopted for 2014. As in most other municipalities, in Municipality Nikšić the key body for monitoring, reporting and evaluation is a Working group- Team. The Action Plan for municipality Nikšić, as well as plans of a large number of other municipalities, does not have clearly defined deadline for implementation of a large number of activities and measures, but it is in almost all cases defined as *continuous*. In addition, AP of Municipality Nikšić does not entail sources for funding of foreseen measures and activities.

Plužine

AP of Municipality Plužine contains six strategic objectives, 36 measures and 88 activities. Unlike the most other adopted plans, the AP for Plužine is adopted for the period from 2014 to 2016.

In addition to failing to provide precise deadline for realization of the most activities and measures, i.e. the deadline is almost always *continuous*, there is no deadline for the activities 36 and 37¹¹ (measure 15, strategic objective one), 53 and 54 (measure 23, strategic objective three) and activity 77 (measure 33, strategic objective four). The Action Plan is almost entirely copied from the Model Action Plan, to the extent that there are some identical language mistakes. Also, this AP does not provide information about the budget, i.e. funding sources for implementation of foreseen activities.

Pljevlja

The Action Plan for fight against corruption in Municipality Pljevlja contains only 38 measures and 98 activities and defines the same objectives as the Model AP. The Action Plan is, compared to the previous, methodologically improved. However, there are still some technical errors, such as a unclear listing of the third strategic objective, in the sense that measures and activities pertaining to the third strategic objective have been listed separately and enumerated, but it is not stated which strategic objective these measures and activities fall under. Also, activities 4-7, besides being copied from the Model AP do not include a measure they fall under, i.e. measure no. 3 has not been listed: *„Determining the situation in the spatial planning and undertaking of preparatory activities for implementation of the Law on Legalization of Informal Structures”* in the part which deals with the listed activities. The AP of this municipality also provides a generic deadline for implementation of specific activities as continuous, whereas the deadline for as much as 8 activities has not been provided (36, 37, 38, 77, 78, 79, 80 and 83). The AP notes that financial resources necessary for implementation of the Action Plan would be provided from the Budget of the Municipality, but the Budget for 2013 does not specifically mention that there are funds allocated for implementation

11 Measure no. 15: Strengthening of accountability of the management structure and the employees; no. 36: Updating of job descriptions and duties and responsibilities for each position and no. 37: Adopting of clear guidelines by management structure for treatment of local civil servants and employees.

of activities for fight against corruption at the local level.

Podgorica

The draft Action Plan for fight against corruption in the Capital city Podgorica has been determined on June 20, 2013.¹² This document defines seven strategic objectives, 29 measures and 73 activities which should contribute to the fight against corruption. There is a seventh objective added to those defined in the Model AP: *increased level of efficiency of work in the local self-government of the Capital city*. Also, unlike the action plans of the other municipalities, the other six strategic objectives have been partially changed. Namely, strategic objective 1 from the Model AP has been divided into two strategic objectives in the AP of the Capital city- increasing the level of accountability and increasing the level of professionalism. Also, strategic objective 4 from the Model AP (*Strengthening of the integrity of the local self-government units and application of ethical standards in local self-governments*) does not exist as a strategic objective in this AP, and at the same time a part of the strategic objective 3 (*Increased internal and external control of the work of local self-government*) and which relates to external control of the work of the local self-government has been omitted. In addition, activities which are listed in Model AP under strategic objective 1, increasing the degree of accountability and professionalism of the work of local self-government, have been shifted in the AP of the Capital city in the frame of the strategic objective titled *Improving the efficiency of the local self-government*, in a minimally modified form. The introduction part of the draft AP omitted the part that refers to the process of preparation of this document, as well as the composition of the working group responsible for drafting of this document. Also, unlike the action plans of the other municipalities, it is specifically stated in the AP of the Capital city that: „*The Action Plan did not address the issue of funding for implementation of activities since finances are necessary*

12 Conclusion no. 01-033/13-853 from June 20, 2013 the Mayor has determined the Draft Action Plan for fight against corruption in the local self-government of the Capital city (2013-2014) and Program of public debate starting from June 26, 2014 and ending on July 10, 2013.

only for a few *planned activities*“, and later in the document it points to the fact that these funds have already been provided for in the original documents, i.e. in the multi-year development plan of the Capital city, Budget of the Capital city and Strategic plan for development of the Capital. However, there are some oversights. Specifically, the activities 12, 13, and 14 (within the strategic objective 1) and activity 51 (within the strategic objective 4) have been listed and grouped, but without specifying to which measure they apply, so there is no measure under which they should be achieved. AP of the Capital City is the only one which differs greatly and visibly from the Model AP. It is the only one which does not use a generic term „continuous“ for determining the deadline for implementation of planned activities, but provides a clear time frame for the most of the activities.

Rožaje

Municipality Rožaje has still not adopted a plan for fight against corruption, although on September 11, 2013 a call was announced to all interested persons for engagement in public debate on the draft Action Plan for fight against corruption, which was published at the website of the municipality. The draft contains six strategic objectives, 33 measures and 88 activities. Employees from the cabinet of the Mayor took part in drafting of the document. This AP as well has been done according to the Model of the harmonized Action Plan for fight against corruption in the local self-government. As in other municipalities, the deadline for most activities from this draft AP is set as *continuous*, and it is foreseen that the activities would be financed from the Budget of municipality. From the technical side, draft AP of Municipality Rožaje has some serious mistakes which contributes to poor structure of the document, as the activities are often not clearly separated from one another, it is not clearly defined to which measure they belong, and except at the very beginning measures and activities have not been properly numbered (for example: after activity no. 6 the following activity is numbered as 9, etc.) or haven't been numbered at all, making it difficult to analyze the document and navigate through it.

Tivat

Draft Action Plan for fight against corruption of the Municipality Tivat had been adopted on November 7, 2013. The AP contains 40 measures and 102 activities. Strategic activities are fully defined by the Model of the harmonized Action Plan for fight against corruption in the local self-government. In cooperation with OSCE Mission and Ministry of Interior, the Union of Municipalities held a seminar entitled “Development of action plan for fight against corruption in local self-governments” held on July 23, 2013 in Tivat, which helped the drafters prepare the AP for this municipality. Like in other municipalities, the AP of Municipality Tivat does not have clearly defined deadlines for a large number of activities, and it does not list the sources for funding of planned activities. However, besides the guidelines from the Model AP, the municipality also recognized the importance of some additional ones; thus, two additional activities have been added to the AP: *“Implementation of the Program for spatial planning”* and *“Implementation of planning documents”* (strategic objective 1). Similarly, in the part pertaining to measure 13: *“Improving communication between competent local government authorities and public services and citizens”*, Municipality Tivat has defined a new activity within its AP, which has not been foreseen by the Model AP. This measure is important because it provides for introduction of so-called system 48, within which it has been foreseen that the citizens will receive a response within 48 hours from the time they report a problem. Also, within the same measure, apart from the activity defined in Model AP related to introduction of direct telephone lines for reporting of irregularities in the work of the bodies or civil servants, it is also foreseen to introduce an ethical line for reporting irregularities in the work of municipal administration and public services. The new activity has been entered under a part dealing with the supervision of work of municipal bodies, i.e. under activity no. 29: *“Increasing professional knowledge in performing of inspection controls”*.

REGIONAL EXPERIENCE- REPUBLIC OF SERBIA

In Serbia, a Report on implementation of the local action plans for fight against corruption for 2013¹³ has been prepared. The author of the Report is the Bureau for Social Research (BIRODI)¹⁴, a „think-tank” organization in charge for coordination of the process of monitoring and evaluation of application of the local action plans for fight against corruption together with local organizations involved in the adoption of the action plans. Drafting of the local action plans for fight against corruption as an idea came from this organization in the framework of the project „Cities against corruption“ which is a part of the larger program „Society against corruption“¹⁵. The concept is that ultimately the fight against corruption is transformed through creating conditions for socialization of the fight against corruption, or *„building of integrity at the level of the society, which represents the sum of the principles that need to be respected in order to create a sustainable model for fight against corruption”*¹⁶.

Local action plans for fight against corruption have been adopted on the basis of the National Action Plan for the Implementation of the National Anti-Corruption Strategy in the Republic of Serbia for the period 2013-2018, and more specifically on the basis of the competencies of the local self-government deriving from this Action Plan.¹⁷ The legal basis of the local action plans for fight against

13 Report is available at: <http://www.birodi.rs/wp-content/uploads/2013/12/Izvestaj-o-sprovodjenju-Lokalnih-planova-za-borbu-protiv-korupcije.pdf>

14 More information about the Bureau can be found at: <http://www.birodi.rs/>

15 More information about this at: <http://www.birodi.rs/drustvo-protiv-korupcije/>

16 Report on Implementation of the Local Action Plans for Fight against corruption, p.3.

17 National Anti-Corruption Strategy in the Republic of Serbia for the period 2013-2019, available at: http://www.acas.rs/images/stories/Nacionalna_strategija_za_borbu_protiv_korupcije.pdf; Action Plan for the Implementation of the National Anti-Corruption Strategy in the Republic of Serbia for the period 2013-2018, available at: http://www.acas.rs/images/stories/Akcioni_plan_za_sprovodjenje_Strategije.pdf

corruption derives from the Law on Local Self-Government.¹⁸ Since the local action plans envisage establishment of Local Anti-Corruption Forum (LAF) as one of the fundamental measures, these forums are included in the Report on implementation of the local action plans for fight against corruption, as regards the integrity and capacity of the forums for implementation of stipulated measures. Additionally, the Report deals with the assessment of the environment in which LAFs function in the local self-governments, as well as with the degree of realization of the measures and the achieved results. The main findings of the Report particularly stress one of the improvements related to introduction of fight against corruption at the local level as one of the priorities of the National Anti-Corruption Strategy, by which this issue gained in importance. There is also an obligation of the Anti-Corruption Agency of Serbia¹⁹ to adopt the Model Action Plan for fight against corruption at the local level, but this document is still not made available on the website of the Agency. Further, in spite of the fact that the issue of fight against corruption at the local level gained in importance, the Report estimates that the process is in the most of municipalities which have adopted local AP in the phase of stagnation or even same as before the adoption of AP. However, in some municipalities the progress is visible.²⁰ Finally, despite the expected, local anti-corruption forums did not prove to be particularly active as regards improving of their working conditions, capacities, implementation of measures and networking with other LAFs. More specifically, the Report states that the only activities that actually have been implemented are those for which the Bureau for Social Research provided conditions for implementation, whereas local self-governments have proven to be indifferent towards LAFs, and they did not create the conditions for the work of the forums or got involved in order to enable this body to carry out its responsibilities in the fight against corruption. Also, the Report states

18 Law on Local Self-Government of Republic of Serbia, available at: http://www.paragraf.rs/propisi_download/zakon_o_lokalnoj_samoupravi.pdf (Articles 2 and 13)

19 Anti-Corruption Agency of Serbia: <http://www.acas.rs/>

20 Niš is in question, where LAFs have been re-established and the municipality UB where LAF has been established and became operational.

that Standing Conference of Cities and Municipalities of Serbia did not show an interest to take part in establishing of a system for fight against corruption at the local level. Media have been assessed in the similar way. The Report states that: *„independence and investigative journalism as a tool in fight against corruption at the local level are a rarity”* and the same is the situation with civil society at the local level which did not show any interest to establish cooperation, although it is: *„a natural ally of LAF as of local control body“*. The Report also states that, due to insufficient willingness of local self-government to create conditions for implementation of the measures envisaged in the local action plans for fight against corruption, of great importance would have been the donor support, which was also missing: *„The donor community in Serbia did not show interest to support the fight against corruption at the local level in relation to the establishment of institutional and normative framework for fight against corruption”*²¹.

Out of 175 cities and municipalities of the Republic of Serbia, at the time the Report on implementation of local action plans for fight against corruption was being prepared, only 11 had action plans.²² However, it is important to look into the structure of the local action plans. The overview of individual local action plans of municipalities which have adopted them shows that at least in the action plan the local self-governments show a remarkable degree of dedication to the fight against corruption, which is reflected in the structure of these documents. Large part of the local action plan is devoted to the narrative part- introduction, principles and values AP promotes and adheres to, legal basis for adoption of the AP, its connection with other strategic documents and implementation mechanisms. Particular concern was expressed in relation to high level corruption, which in Serbia significantly contributes to *„slowing down of transition processes, and primarily to the establishment of the rule of law, democracy, market economy and socially responsible economy“*, since the state

21 The main quoted findings presented above are available in the Report on Implementation of the Local Action Plans for Fight against Corruption, pages 6 and 7.

22 These are: Zrenjanin, Kragujevac, Niš, Požega, Ub, Bor, Kovačica, Vranje, Lebane, Medveđa, Bujanovac.

bodies contribute to poor working conditions of anti-corruption bodies and poor implementation of anti-corruption laws in Serbia.²³ The action plans devote considerable attention to the protection of „whistleblowers“, even though their rights, according to the action plans, are only now starting to be regulated in Serbia. However, in order to protect the „whistleblowers“ the Anti-Corruption Agency maintains records at its website and publishes a number of persons who have received the status of „whistleblowers“.²⁴

The positive side of the action plans at the local level in Serbia is that each contains information about the Working group that participated in its preparation, and each individuals name is listed. Also, the measures in the Action Plan are divided in two groups. The first group contains direct measures (those related to the development of anti-corruption infrastructure, creation of the sustainable system for fight against corruption at the local level). In the second group are indirect measures which should contribute to creating a better environment for fight against corruption.

Finally, in the part related to implementation mechanisms, it is stated that local anti-corruption forums should be in charge of the process of implementation of the LAP, whereas the lead in the process of monitoring and evaluation of implementation of LAPs should be the Bureau for Social Research, which prepares annual reports on implementation of Local Action Plans for fight against corruption.

23 Report on implementation of local action plans for fight against corruption, p. 4.

24 At the time this study was prepared, from 165 received requests for the status of whistleblowers, the Agency granted this status to 95 persons.

LESSONS LEARNED, CONCLUSIONS AND RECOMMENDATIONS

Preparation of local action plans for fight against corruption and their adoption represent isolated activities in the fight against corruption at the local level. By July 2014, from 14 municipalities²⁵ which have been monitored through this project, two municipalities have failed to adopt the action plans for the period 2013-2014. Preparation of the action plans for 2009-2012 and 2013-2014 lacked objective and analytical approach, identification of specific risks in each of the municipalities, involvement of experts, as well as comprehensiveness of the established measures.

Strategic and operational objectives, measures, activities and indicators have been clearly defined by the Model of harmonized action plan for fight against corruption in the local self-government and they need to serve as a framework for the development of the local action plans for municipalities. Nonetheless, Model AP should not be literally copied. Additionally, Model AP needs to be improved with specific measures and activities for each of the municipalities, and especially within the areas that are particularly sensitive to corruption, such as public procurement, public-private partnerships, urban planning (in one part), work of the local assemblies and political corruption. Unfortunately, municipalities did not use the Model AP as a starting point, but basically copied proposals and solutions from it into specific action plans, and by doing so have shown the lack of importance given to the fight against corruption at the local level. Municipalities have copied the Model AP in their action plans to the extent that there are some contradictions that can be found in these documents, such as

²⁵ Bar, Budva, Cetinje, Danilovgrad, Herceg Novi, Kolašin, Kotor, Mojkovac, Nikšić, Pljevlja, Plužine, Podgorica, Rožaje and Tivat.

the deadlines for implementation of activities which expire before the adoption of the Action Plan, language mistakes, mistakes in labeling of tables, etc.

The deadlines for implementation are dominantly set to be „continuous“, i.e. are not precisely defined. Funding for implementation of measures is also not precise or is completely lacking in some cases. Likewise, the annual budgets of the local self-governments do not foresee separate items which would relate to implementation of the activities from the Action Plans, which makes the implementation of activities more difficult, and a number of planned activities have not been realized for this reason (this refers to the period 2009-2012). There are also examples of municipalities which asked for funding from the Ministry of Interior in order to implement the activities, and this represents bad financial planning, but also serves as evidence that the municipalities do not perceive this issue as important enough for them to invest their budgetary resources.

Improving the transparency of preparation of these documents would be possible through involvement of representatives of NGO sector, as well as other stakeholders in the earliest phases of their development. However, it is often not specified in the document who worked on it.

When talking about the effects of implementation of the local action plans for fight against corruption at the local level, it can be concluded that there is some impact on reduction of the level of tolerance towards corruption, as well as the cultural perception of corruption as a negative phenomenon. However, the overall results are very modest in this as well. One of the reasons is that the activities mainly did not require any significant involvement of the municipal employees, nor significant budgetary allocations. In order to adapt the local APs to the specifics of the municipalities it is important to make additional efforts and take advantage of the lessons learned. In this respect it is necessary to:

- 1) Align the action plans to the specificities of each of local self-governments individually, while taking into account their

different degree of development, commercial bases, spatial and demographic characteristics. Basic structure, apart from the existing one which is already included in the action plans, needs to treat the area of employment; spatial development in the area of issuing of construction documents; commerce in the part of issuing of licenses, inspection and communal control; while the areas such as public procurement, concessions, public-private partnerships, role of local assemblies and political corruption need to be additionally treated in the action plans, with a special reference to the establishment of the full transparency in these areas;

- 2) Prescribe the responsibilities and duties of local self-government and in relation to these formulate anti-corruption mechanisms;
- 3) For each separate municipality make a division between the primary and secondary risks for occurrence or existence of corruption and based on this make a structure and mechanisms for prevention and fight against corruption at the local level;
- 4) For each of the measures foreseen in the action plans, publically designate a person who is primarily responsible for realization, as well clearly prescribe the rights and duties required to operate at the full capacity of the primarily responsible person;
- 5) The action plans must be prepared based on previously conducted analysis and public opinion polls, which would be presented to the public and discussed at the assembly sessions in the local self-governments. The questionnaires for the surveys need to be designed in such a way so as to reflect the perception and experience of citizens who had contact with local self-government bodies in order to serve as a high quality material for formulation of concrete activities in the new action plans;
- 6) Unlike the action plans and their contents which should be tailored to the local self-governments they relate to, reporting on the degree and quality of implementation needs to be standardized and uniform for easier comparison, analysis and determining of the new and improved measures for fight against corruption at the local level;

- 7) It is necessary to determine in advance all deadlines for reporting to the Commission for monitoring of implementation and to publish all forms and reports of municipalities on the official web sites of municipalities. At the same time, it is necessary to inform the public in more detail about the work of the Commission for monitoring of implementation of the action plans of local self-governments for fight against corruption;
- 8) There is a need to accurately predict the funds for implementation of all activities envisaged in the plan before requesting the funds for implementation of specific activities from the action plans through the competent ministry, which has not been the case until now. It is necessary to clearly allocate the funds from the budgets of local self-governments which should be used in fight against corruption at the local level;
- 9) Local self-governments should pay special attention to public relations regarding the fight against corruption at the local level. There is a need to specify the obligation to periodically examine public opinion on the level of corruption through the municipal decisions and to publically present the obtained results, to prepare guides on anti-corruption mechanisms and local self-government bodies with clear instructions for citizens about their rights and duties, to precisely define a procedure for submitting of civil petitions, to make publicly available the procedures of career advancement in line with clear criteria and measurable results;
- 10) At least once per year, organize working meetings of persons responsible for monitoring of implementation of the action plans in individual municipalities and members of the National Commission for fight against corruption and organized crime or representatives of an equivalent national body should be present during these meetings;
- 11) In the form for reporting include a section for regular reporting on the number of submitted complaints against local civil servants, about the stage the complaint is currently in, criminal prosecution, court proceedings;
- 12) Timely work on drafting of the local action plans, in order

to avoid the periods which are not covered by the strategic documents, which usually results in the absence of concrete activities in fight against corruption;

- 13) Improve the quality of the action plans by involving the experts in their drafting, as well as the representatives of the civil sector and all interested parties;
- 14) Deadlines for implementation of activities should be clearly defined whenever this is possible, and „continuous“ implementation should be connected to a specific quarter and year;
- 15) Financing sources and estimation of costs for individual activities should be enlisted in the action plan.

APPENDIX - Local self-government as one of the areas of risk for corruption

The second National Strategy for fight against corruption and organized crime (2010-2015) shows that „*surveys on perception of corruption particularly emphasize the presence of corruption in the fields of spatial development and planning, privatization, judiciary, customs and tax services, **local self-government**, police and health care*“.

The strategy mentions that the Assembly of the Union of Municipalities of Montenegro adopted the *Code of Ethics of elected representatives and officials in the local self-government and Code of Ethics of local civil servants and employees*, on the basis of which local self-government units adopted their own Codes of Ethics. It is also stated that the findings of the public opinion polls conducted by the local self-governments reveal a predominant view that corruption is particularly present **in the fields of employment, issuance of building and work permits, inspection control, etc. However, the Action Plans do not address these areas of risk of corruption.**

Finally, it is concluded that, although legal preconditions for development of local self-government and fight against corruption have been created, „**factual situation indicates that there is still work to be done on rounding up the solutions and their further elaboration, in order to reform the overall system, and thus also in fight against corruption at the local level**“ In that respect, an Innovated Action Plan for implementation of this Strategy (2010-2012) introduces **measures** which relate to:

- a) *Harmonizing of local APs for fight against corruption with the Strategy,*
- b) *Monitoring of local APs,*
- c) *Establishing of the training program according to the needs of the*

- local self-government units,*
- d) Conducting of external audit,*
 - d) Informing the public on the work of the Council for Protection of Local Self-Government,*
 - e) Monitoring the organization of public discussions,*
 - f) Affirming the „empty seat” institute,*
 - g) Improving the cooperation between the citizens and local self-government bodies in the area of the fight against corruption.*

The latest Action Plan for implementation of the Strategy (2013- 2014) contains the same measures in the section „local self-government” and some additional ones in some other sections, such as:

- a) Specify the competence of local governments in the area of reporting to the SEC on the payment of funds to political parties.*
- b) Report on payment of funds to political parties at the local level,*
- c) Improve the control of spending funds allocated in state and local budgets for co-financing of sport organizations, etc.*

APPENDIX - Problems identified in AURUM

In 2011, therefore, during the third year of implementation of the adopted local action plans, in the area of the Government's **Strategy of public administration reform in Montenegro for the period 2011-2016 (AURUM)**²⁶ which relates to the local self-government it is stated that „some shortcomings are still present which need to be rectified in the coming period“. Among the identified shortcomings are numerous issues which have been treated through the Local Action Plans.

- *Lack of efficiency in the collection of own revenue of local governments and a high budget deficit, with a high level of indebtedness at the local level and inefficient or inappropriate use of funds;*
- *Inadequate system of financing local government;*
- *Insufficient internal and external control of financial operations of local governments;*
- *Non-stimulating functioning of the Equalization Fund;*
- *Insufficient level of cooperation between local representatives and citizens, and employees of local governments and citizens;*
- *A lack of transparency of local self-government bodies to citizens and businesses;*
- *Insufficient level of development of quality systems;*
- *Non-optimal number of employees in local governments and agencies;*
- *Lack of motivation of employees;*
- *Low level of horizontal and vertical communication within the authority of local governments;*

26 Adopted in March 2011

- *Insufficient capacity of the Union of Municipalities and local governments in the conduct of personnel management;*
- **Uncoordinated activities to fight corruption in local government and their lack of compliance with the sectorial action plans to combat corruption;**
- ***Differences in provision of public services and access to public services among municipalities, as well as the ability of local governments to promote local economic development;***
- *Unplanned economic development in certain local governments;*
- *Insufficient and non-transparent inter-municipal and cross-border cooperation between local governments;*
- *Lack of an effective system of inspection at the local level;*
- ***Low quality of service delivery by local public services;***
- *Complex and costly administrative procedures and uneconomical performance of individual local government bodies.*

APPENDIX - Analysis of the functioning of local self-government in Montenegro

Government's Analysis of the functioning of local self-government in Montenegro, adopted on June 21, 2012 deals with the activities of the local self-government units in implementation of measures envisaged by the Action Plan and Program of fight against corruption at the local level.²⁷ The analysis states that „realization of measures from the action plans for fight against corruption in local self-government differs in different local self-governments and depends on several factors:

- *willingness of the local government authorities to implement envisaged measures and activities, and especially of persons responsible for implementation of activities from the action plans;*
- *administrative capacities of local government bodies;*
- *conducted trainings of local civil servants;*
- *and provided funds for implementation of the activities and work of the Commissions.*

The analysis also provides an overview of the final information submitted to the Commission for monitoring of implementation of action plans, according to which, the degree of implementation of measures achieved in local self-government units in percentages is:

1) Capital city – Podgorica 88,8 %,
2) Old Royal Capital – Cetinje 50,00%,
3) Tivat 97,05%,
4) Bijelo Polje 96,10%,
5) Nikšić 89,8%,
6) Herceg Novi 82,92%,
7) Kotor 100%,
8) Andrijevica 87,5%,
9) Pljevlja 5,20%,
10) Budva 69,56%,

²⁷ Chapter 9.2.1 of the Analysis on functioning of local self-government in Montenegro

11) Danilovgrad 86,30%,
12) Plužine 66,70%,
13) Bar 67,80%,
14) Plav 54,54%,
15) Mojkovac, 53,33%,
16) Berane, 72,33%,
17) Kolašin, 66,00%,
18) Ulcinj 37,50% i
19) Rožaje 14,80%
20) Municipality Šavnik did not provide information on implementation of AP

However, a more in-depth analysis of the data from the Report on implementation of activities from specific action plans shows that reporting is unbalanced and that data are not comparable due to different assessment of municipalities about what was achieved, and therefore the final percentages received in this manner are subjective and unreliable.

Examples:

Although the number of operational objectives and activities is more or less the same for all municipalities, there are significant differences in the final overviews of implemented measures. Thus, Capital city reports that in Podgorica 4 activities have been realized within the first operational objective of the first strategic objective, while Municipality Bijelo Polje „reports” 10 activities for the same operational objective. The difference is that Capital only reports those activities for which they are the main implementers.

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29. Program of fight against corruption and Action Plan for fight against corruption in Old Royal Capital Cetinje (2009-2012)
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34. Program of fight against corruption and Action Plan for fight against corruption in Municipality Pljevlja (2009-2012)
35. Strategy for fight against corruption and organized crime (2010-2015)
36. Program of fight against corruption and Action Plan for implementation of Strategy for fight against corruption and organized crime (2013-2014)
37. Strategy of public administration reform in Montenegro or the period 2011-2016 (AURUM)

Web sites:

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