



Remarks and Suggestions
on the Second Chapter of the Republic of Armenia Anti-corruption Strategy and
Its 2008-2012 Implementation Action Plan
by the Transparency International Anti-corruption Center

General remarks and suggestions

1. We reiterate our suggestion, that is, “in order to provide broader and public discussion the draft strategy should chapter by chapter be posted on the Government of Armenia website at www.gov.am.”
2. The materials to be discussed regarding each chapter of the strategy should be sent in advance, at least 10 days prior to the discussion. For the discussion of the final document the complete material should be sent at least 20 days prior to the discussion.

Remarks and suggestions by sections and points

Section 2.1

1. The actions mentioned in point 2 are the Strategy objectives.
2. Points 3 and 6 of section 2.2 can be removed to section 2.1 as points 2 and 3 respectively. Accordingly, the current point 2 shall be changed to point 4.

Section 2.2

1. Either take out the words “and its implementation action plan” in the title of section 2.2 (generally, principles and goals refer to strategies), or formulate as “attribute the expected results only to the implementation action plan.”
2. Point 3 – Either take out the point as a whole or leave only the reference to the Republic of Armenia government program, and it is better to specifically mention strategy’s relation to the government program.
3. Point 4- Clarify what is implied by the expression of “interim and preliminary levels.” In particular, if “interim” refers to time, what does the point 10 mean? The same goes to “preliminary.” In addition, there is no mention of the preliminary level of the expected results in the further depiction of the section.



4. Point 6 – Add to the first clause: “...as a result of ACSIAP implementation by 2012 the corruption will lose its systemic nature.” Also add a new clause after the first one with the following content. “As a result of achieving that goal, the levels of all three types of corruption, that is transactional, administrative and political will be significantly reduced.” Take out point 10 with regard to it. Also take out the expression “by 2012 the corruption will lose its systemic nature” from the second clause of the point.
5. Clarify on what grounds the targets of the indices stated in the section were defined (the indices of Transparency International’s (TI) Corruption Perceptions Index (CPI) and the World Bank’s (WB) Control of Corruption Index (CCI)). If it is what is depicted in point 5, it may be included in point 8, as its first part.
6. Also mention in point 15 on the improvement of party finance transparency as one of the prerequisites of reducing the political corruption level.

Section 2.3

1. Point 20 – add “government employees’ official promotion regulation” to subpoint 3 and “e-governance” to subpoint 9.
2. Break up point 22, making two separate points, “enhancement of the role of mass media, creation of implementation mechanisms for freedom of information legislation” /the first three subpoints/ and in a separate point “political stability, ensuring political rights and civil freedoms” /subpoints 4-7/. In the subpoint on “the use of administrative resource in the elections,” add the expression “of all sorts, including coercive, regulatory, legislative, institutional, financial, and state-owned media” after the word “resource.”
3. At the end of the second and third subpoints of point 24 add the phrase “and ensuring cooperation with civil society organizations in their implementation.”
4. Point 27 –Several areas are not mentioned, e.g. army, diplomatic service, etc. Besides, clarify as to why areas so different from one another are included within the framework of “internal affairs (interior) .” (This implies that the relevant anti-corruption measures in each of the areas would be essentially different both in conceptual level and content matters).

Section 2.4

1. Taking into consideration both the title and the logics of chapter II, it is expedient to include points 28-49 (with the exception of point 42) based on their content, in a separate section of chapter I. The section can start from point 42 by making a reference to the corresponding new section of chapter I.



2. Despite a mention of CRD/TI Armenia's resignation from the Anti-corruption Monitoring Committee (see point 39), it is not clear what were the reasons of resignation (see the organization's official statement about it to be found in the organization's website – www.transparency.am) and whether it was related to the content of the previous clause.
3. After point 44 it is worth mentioning in a separate point that policy of corruption detection was also decentralized, since it was not coordinated with the work of the relevant specialized structures within the Prosecutor General's Office, Police and National Security Service of Armenia.
4. Add a new point after point 57, which will define the principles of the Council's activity, by mentioning transparency and accountability as important principles. We suggest
 - a/ that all the meetings be open /in case of special instances when they are not, give their specific definition/
 - b/ all the reports, references, minutes and other materials, including working ones regularly be posted on the website.
 - c/ the results of discussions and voting be posted on the website.
 - d/ press conferences be periodically organized, e.g. once in three months.
5. The word “state” should be substituted with that of “public” in the penultimate subpoint of point 58 (on declaration of public servants' property and income) to also include the local officials.
6. Point 61 – Provision of civil society participation via Public Council under the President of Armenia in fighting corruption restricts the diversity and representation of those organizations. The development of relevant mechanisms should be left to the jurisdiction of the future anti-corruption specialized body, by involving in the discussion all the interested specialized public organizations.

Yerevan

20 October, 2008