CORRUPTION LEVELS IN SOUTHEAST EUROPE

1.1. CMS METHODOLOGY

Significant efforts have been invested by governments, NGOs and international institutions in scaling back corruption in Southeast Europe. Where these efforts have had success it should be attributed partly to an increased body of knowledge about the manifestations, underlying causes and incidence of corruption in a transition environment. The EU approach in this respect has also been changing. While earlier priority had been given to input indicators (regulations, procedures, etc.) focus now has shifted to output indicators (actual impact). Member states have also contributed to understanding corruption and recommending action through the mechanism of peer reviews. Still, "identifying anti-corruption progress remains largely arbitrary. Corruption […] is an evolving concept. Understanding corruption and obtaining reliable information about its dynamics are crucial to the implementation of successful prevention and control policies."[7] It is with this purpose in mind that SELDI developed its *Corruption Monitoring System* (CMS).[8] Designed by the Center for the Study of Democracy, the CMS has been recognised by the UN as a best practice in corruption monitoring. Introduced at a time when corruption measurement was confined to public perceptions, the CMS transformed monitoring by introducing a measure of the **victimisation** of individuals by corrupt officials accounting for their **direct experience** with various corruption patterns. It allows assessments to be made about the dynamics of proliferation of corruption behaviour patterns (prevalence of corrupt transactions) in a society. The CMS methodology ensures comparability of data across countries and registers the **actual level and trends** of corruption, as well as the public attitudes, assessments and expectations in relation to corruption.

The major outputs of CMS are the *Corruption Indexes*.[9] They are based on surveys included in the CMS and summarise the most important aspects of corruption behaviour patterns. The main indicators of the CMS describe corruption as a social phenomenon using three groups of sub-concepts:

- experience,
- attitudes, and
- perceptions.

Figure 2. Structure of the Corruption Monitoring System Indexes
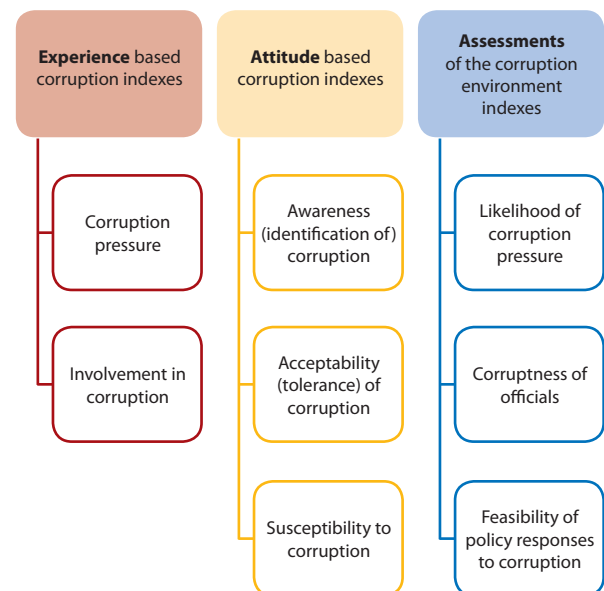
The CMS gauges the principal empirical manifestations of administrative corruption patterns. In terms of definition, administrative corruption includes the extension of benefits (money, gifts, and favours) by citizens in exchange for services they obtain by public officials. The **experience** aspect of administrative corruption contains two indicators:

- **Involvement in corruption** captures the instances when citizens make informal payments to public officials. The concrete questions used to gather information about this indicator are victimisation questions and reflect experience during the preceding year. The index summarises citizens' reports and divides them into two categories: people without corruption experience (have not given bribes) and people with corruption experience

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[7] Center for the Study of Democracy, 2007.

[8] For more information, please refer to (Center for the Study of Democracy, 2002) and (Center for the Study of Democracy, 1998, pp. 61-94).

[9] Every index is based on the aggregation of data from several variables (research questions). See further the Methodological Appendix.

(have given bribes at least once during the preceding year).[10]

- **Corruption pressure** reflects instances of initiation of bribe seeking by public officials: directly by asking for an informal payment or indirectly by implying that an informal payment would lead to a positive (for the citizen) outcome. CMS results have shown that pressure has been a decisive factor for involvement. Most corruption transactions occur after the active solicitation of payments by officials.

Direct involvement in corruption transactions is accompanied by the prevalence of specific **attitudes** towards corruption and corruption behaviour and by perception of the spread of corruption in society. Ideally, low levels of involvement in corruption would be paired with negative attitudes towards corrupt behaviour and perceptions that corruption is rare and unlikely. This does not mean that perceptions and attitudes directly determine corruption behaviour of citizens. Rather they could influence behaviour to a certain degree but essentially express the general social and political atmosphere in society related to corruption.

The indexes capturing different aspects of attitudes towards and perceptions of corruption included in the CMS are:

- **Awareness (identification) of corruption** is an index accounting for the level of understanding of citizens as to what constitutes corruption behaviour. The index differentiates between three categories of awareness: high (citizens who identify all or most of the common corruption behaviour patterns as corruption), moderate (many of the common corruption practices are identified but some forms of corruption are classified as "normal behaviour"), low (few corruption patterns are identified as corruption).
- **Acceptability (tolerance) of corrupt behaviour**. While awareness captures the knowledge component, acceptability of corruption captures tolerance (or lack of tolerance) towards corruption. It summarises

citizens' assessments of the acceptability for members of parliament or government as well as civil servants at ministries, municipalities and mayoralties to take gifts, money, favours or receive a free lunch ("get a treat") in return to solving someone's problems.

- **Susceptibility to corruption** reflects the tendency of the respondents to react in two hypothetical situations – one involves being in the role of an underpaid public official and accepting or denying a bribe that was offered; the other situation asks about giving a bribe to a corrupt public official, if one had a major problem to solve and was asked explicitly for a bribe in cash. Declaring the denying of a bribe in both situations is interpreted as the respondent being not susceptible to corruption, while accepting/giving a bribe in both is interpreted as susceptibility, while giving/taking a bribe in one of the situations and not in the other is defined as "mixed behaviour".

The experience with corruption and the attitudes towards corruption, as well as the general current sentiment and level of trust towards public institutions in society determine the public's **assessment** of the corruptness of the environment. These perceptions are summarised in the following indexes:

- **Likelihood of corruption pressure** is an index measuring expectations of citizens of the likelihood of facing corruption pressure in their interaction with public officials. Overall, this is an index gauging perceptions of the corruptness of the environment. Corruption theory[11] considers that people would be more likely to "use" corruption patterns if they assess the environment is intrinsically corrupt.
- **Corruptness of officials** is an index reflecting perceptions of the integrity reputation of different groups of public officials; it thus constitutes an estimate by the public of the corruptness of the various public services. The interpretation of this index is specific, as it is an assessment of attitudes of citizens towards public officials rather than a measure of the prevalence of corruption in the respective offices. The added value of this index is that it helps identify sectors most affected by corruption or being least trusted by the public.
- **Feasibility of policy responses** to corruption is an indicator capturing the "public thinking" about policy responses to corruption. More specifically it evaluates potential public trust in the government's

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[10] Over the years the wording of questions has been preserved in order to ensure comparability of data. However, calculation methodology has been modified. Prior to 2013 indexes were calculated based on a normalisation procedure and their values ranged from 0 to 10. While this is a standard procedure, it has created difficulties in the concrete interpretation of index values. To overcome this difficulty the aggregation procedure has been modified and uses direct recoding of response groups. This makes it possible to position respondents into distinct and directly interpretable categories referring to different aspects of corruption behaviour patterns. See further the Methodological Appendix.

[11] See (Rothstein, 2007:3).

willingness and/or capacity to tackle corruption, as well as the potential support for anticorruption policies.

1.2. EXPERIENCE WITH CORRUPTION

Corruption pressure and involvement are based on the actual experiences of citizens from the SELDI countries with corruption. The corruption pressure index reflects how often citizens were asked directly to pay a bribe by a public official and how often the public official did not ask directly, but indicated that he/she expected a bribe. Regardless of whether such pressure was experienced in isolated contacts with public officials only or in most of the contacts a person had with the public officials of the country, these cases are considered victims of corruption pressure.

Even isolated cases of one of the three forms of bribery during the preceding year are considered as corruption incidents (involvement in corruption). It should be noted that not everyone who had been involved in corruption during the preceding year would report experiencing pressure by officials. Such cases, where involvement in corruption took place without pressure, are interpreted as initiation of the transaction by the citizens themselves.

The CMS 2014 results in Figure 3 show the corruption pressure and the involvement in corruption for the year preceding the CMS implementation (2013). Countries are sorted by the share of respondents reporting involvement in corruption transactions, starting from the highest share of people involved in actual transactions (39% of the population in Albania) to the lowest share (9% in Turkey). The ordering with regard to corruption pressure is very similar, with only Turkey and Bulgaria changing their ranking by one position if the ordering is done according to corruption pressure. The value of the indexes, and the comparison between the SELDI countries warrant several conclusions:

• Experience with corruption (involvement of citizens in corruption transactions) in the SELDI countries is very high. Even in Turkey and Croatia, where levels of administrative corruption are lowest in the region, about 8-9% of the population reports having given a bribe in the preceding year. Such levels of experience with corruption are well beyond average

levels registered by the Eurobarometer surveys in the EU.[12] This shows that administrative corruption is a **mass phenomenon** and cannot be confined to "single cases" of corrupt officials.

• For Bulgaria a longer time series of CMS indexes is available, including data collected since 1999. The lowest levels of involvement for Bulgaria have been registered in 2010 (about 10%) and have gradually increased since then. There has been a sharp increase since then, which can generally be explained by the unstable political situation in the country in 2013 – 2014, including the change of 3 successive governments and wide public discontent and protests. Developments in Bulgaria suggest that **EU membership in itself is not enough** to lead to sustained reduction in corruption but efforts need to be integrated into public institutions, and results should be sustainable already before accession.

• Observed levels of administrative corruption lead to the conclusion that it is **systemic** and should be regarded as a specific characteristic of the mode of operation of public institutions. Substantial differences even between countries with a common historical background show that different paths of social, economic and institutional development render differing results.

Figure 3. Corruption pressure and involvement in corruption

(% of the population 18+ who have been asked to give and have given a bribe (money, favour, gift) in the preceding year)

Country	Pressure (have been asked for a bribe)	Involvement (have given a bribe)
Albania	45.3%	38.9%
Montenegro	34.3%	31.6%
Bulgaria	39.4%	29.3%
Serbia	29.9%	27.4%
Macedonia	25.6%	21.5%
Kosovo	23.4%	20.4%
Bosnia and Herzegovina	22.9%	15.9%
Croatia	9.8%	9.2%
Turkey	13.3%	8.8%

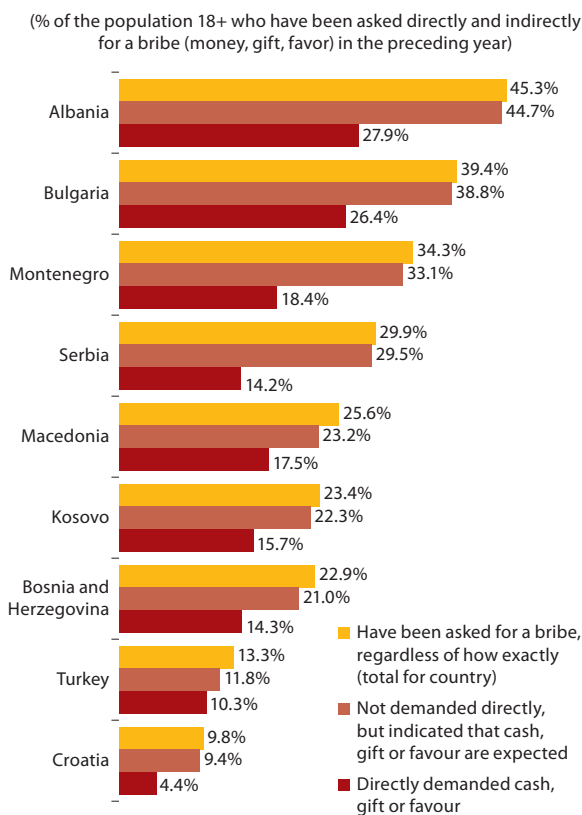*Source:* SELDI/CSD Corruption Monitoring System, 2014.

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[12] Indicators for experience with corruption used in the Eurobarometer surveys have slightly different content as they refer to direct experience and cases when citizens have witnessed cases of bribery. For more details, please refer to (TNS Opinion & Social, February 2014).

- Overall, with the exception of Bulgaria, the changes since previous SELDI rounds of CMS diagnostics (2001 and 2002) for all countries are positive. However, they are not considered satisfactory by governments, the business sector and citizens. Progress has been slow and uneven.

The two components of corruption pressure – percentage of the population who were asked directly for a bribe and the percentage who were not asked directly, but the officials managed to show they expected to receive a bribe are shown on Figure 4.[13] It is not surprising that most often the officials ask for a bribe indirectly, indicating that they expect it without asking explicitly. Still, in a lot of the cases this is done directly (explicitly) which comes to show that bribery is considered more or less a normal scenario.

The highest levels of explicit pressure have been observed in Albania (28%) and Bulgaria (26%). In Montenegro and Serbia the pressure is more often

Figure 4. Explicit and implicit corruption pressure

(% of the population 18+ who have been asked directly and indirectly for a bribe (money, gift, favor) in the preceding year)

Have been asked for a bribe, regardless of how exactly (total for country)	
Not demanded directly, but indicated that cash, gift or favour are expected	
Directly demanded cash, gift or favour	

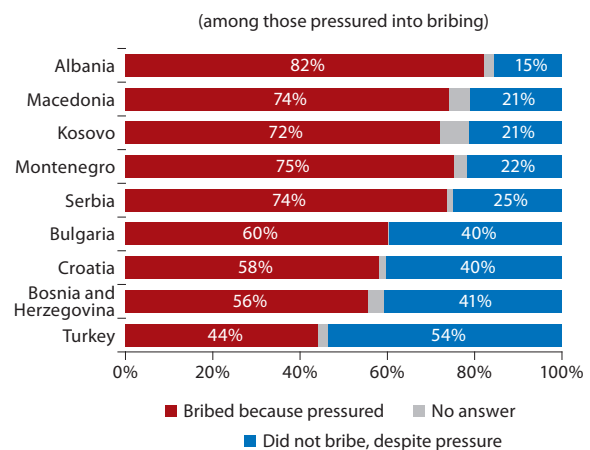*Source:* SELDI/CSD Corruption Monitoring System, 2014.

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[13] Implicit and explicit pressure do not add up to the total pressure percentage, because very often respondents experienced both types of pressure during the year.

implicit, while explicit pressure is not so common. Another country where the explicit pressure is almost as high as the implicit is Turkey, where 12% of citizens report cases of implicit pressure and 10% report they were asked explicitly.

Corruption pressure is the main factor that statistically influences the level of involvement. Still, pressure does not necessarily mean that a citizen would give a bribe. The share of respondents who experienced pressure but did not give a bribe is presented in Figure 5. Most of the countries with high corruption involvement and pressure are also characterised by low **resilience** to corruption pressure (most of the respondents who were asked for a bribe gave one). There are, however, some exceptions, most notably Bulgaria which is one of the top three countries in terms of corruption pressure and actual transactions, but in terms of resilience ranks together with less corrupted countries like Croatia and BiH. Macedonia rises to second rank in terms of respondents who yield to pressure. The high resilience in Turkey explains why actual corruption transactions are less common than even in Croatia, regardless of the higher pressure (13.3% pressure in Turkey, while only 9.8% in Croatia).

Data also show that resilience to pressure is substantially higher in less corrupt environments (e.g. Turkey compared to Albania). However, this does not make resilience a factor to reduce corruption; rather it reflects the overall atmosphere in society.

Figure 5. Resilience to corruption pressure

(among those pressured into bribing)

Source: SELDI/CSD Corruption Monitoring System, 2014. Base: respondents who experienced corruption pressure.

Although there are different possible reasons for the variations in resilience across the countries, the **attitudes towards corruption** indicators provide one

possible explanation – the lower the acceptability of corruption as part of the environment, the higher resilience would be. In other words, if more people think that corruption is acceptable, more of the citizens pressed for bribes are likely to yield and be involved in actual corruption transactions (Figure 6).

**Figure 6. Corruption pressure and acceptability of corrupt behaviour**
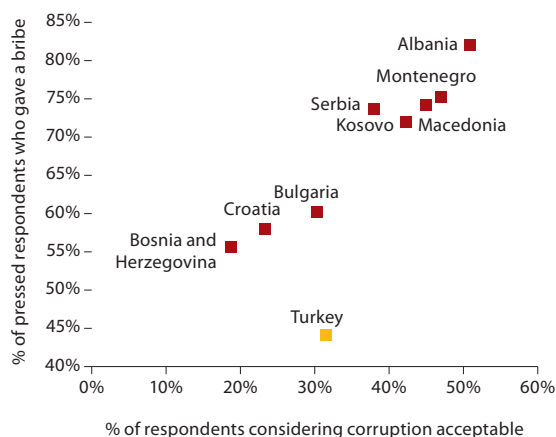
Source: SELDI/CSD Corruption Monitoring System, 2014.

Cross-country comparisons show that there are some major differences between the countries in terms of the most common means of bribery (Figure 7).[14]

While in Albania money is by far the most often used means of bribery (34% compared to 20% giving gifts and 17% doing favours), in most of the SELDI countries gifts are given more often than money – Montenegro (26% gave gifts, 20% gave money), Serbia (22% gave gifts, 13% gave money), Kosovo (16% gave gifts, 13% gave money), Croatia (8% gave gifts, only 4% gave money). Other countries like Bulgaria and Turkey are characterised by relatively similar shares of respondents who gave money, gifts, or did favours.

In some cases transactions are admittedly initiated by citizens themselves: they were not pressed by the public officials (neither explicitly, nor implicitly), but still gave a bribe (money, gift or a favour). Such active involvement is most common in Bulgaria (5.5%) and Montenegro (5.1% of the population), but – interestingly – also present in the low corruption countries like Croatia and Turkey (3.3% and 2.6% respectively). The reasons for such a strategy in

Figure 7. Involvement in corruption – types of bribes
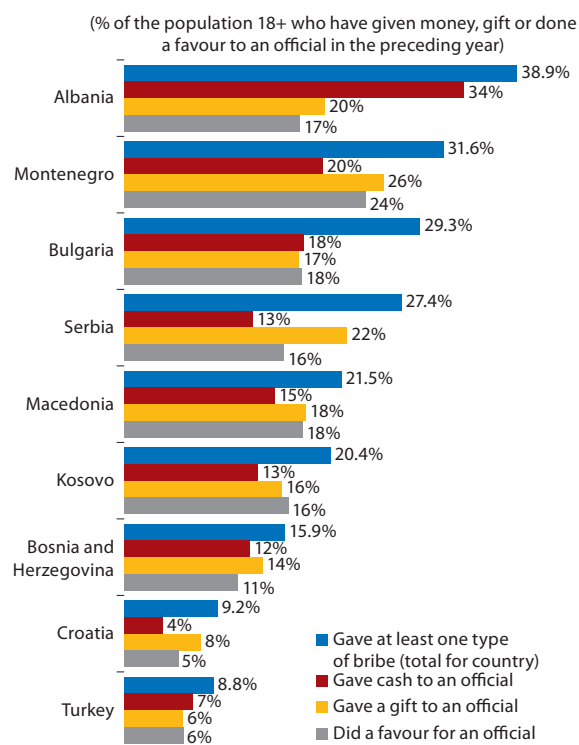
Source: SELDI/CSD Corruption Monitoring System, 2014.

dealing with public officials are probably a complex combination of various factors such as:

- corruptness of the environment (if everyone is considered corrupt, people might try to bribe without pressure);
- levels of corruption pressure (if the pressure is declining very fast, the citizens might try to initiate the transaction themselves in particular if they have done or asked for something undue);
- effectiveness of law enforcement (if law enforcement is effective or the punishment is very severe, people might avoid offering bribes themselves, without indication that these bribes are expected and would be accepted by the official).

The full distribution of experiences with corruption pressure and reaction to it are presented in Figure 8 and Figure 9. Missing information (no answers, refusals to answer) are informative as well, as higher percentage of such answers (as in Kosovo or in Bosnia and Herzegovina) might indicate reluctance of the respondents to admit they were pressed for a bribe or involved in such transactions. This might be an indication of general fear of prosecution among the population if their answers are revealed.
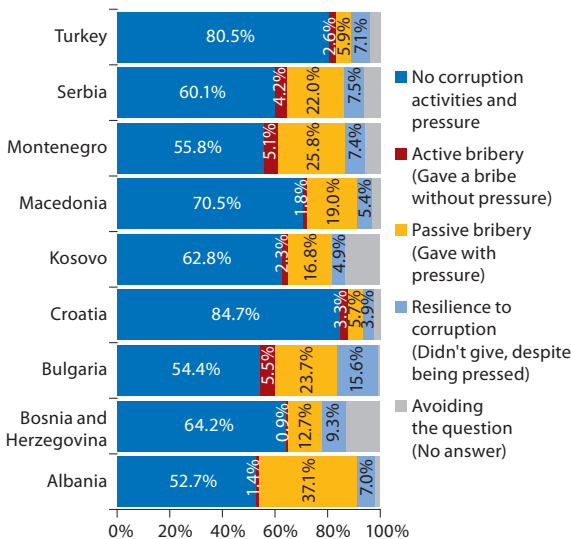
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[14] "Money, gifts and favours" transactions do not add up to the total involvement percentage, because very often respondents were involved in different types of bribery at the same time.

Figure 8. Involvement in corruption with or without corruption pressure

(% of the population 18+, who have given a bribe with or without corruption pressure)

- Gave without corruption pressure
- Gave with corruption pressure
- No answer
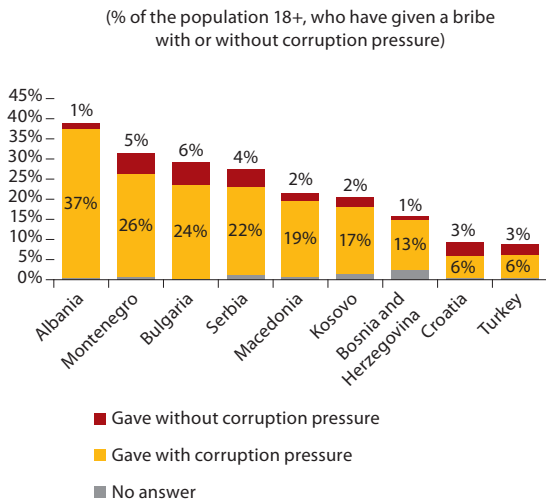
Source: SELDI/CSD Corruption Monitoring System, 2014.

**Figure 9. Corruption activities and pressure – citizens' involvement in corruption transactions**

- No corruption activities and pressure
- Active bribery (Gave a bribe without pressure)
- Passive bribery (Gave with pressure)
- Resilience to corruption (Didn't give, despite being pressed)
- Avoiding the question (No answer)

Source: SELDI/CSD Corruption Monitoring System, 2014.

1.3. ATTITUDES TOWARDS CORRUPTION

Attitudes towards corruption reflect people's mind-set with regard to corruption transactions. The CMS includes three attitudes indexes: acceptability, awareness of and susceptibility to corruption. The overall conclusions from the three attitudes indexes that could be made are as follows:

- High levels of administrative corruption usually coincide with higher levels of acceptability (Albania) and vice-versa (Turkey, Croatia). Still, there are exceptions from this pattern (e.g. Bulgaria, Bosnia and Herzegovina), where the lower relative acceptability comes against the backdrop of higher levels of administrative corruption. This normally breeds resignation, distrust of public institutions, and high potential for protest.

Figure 10. Acceptability of corruption

(% of the population 18+, who accept different forms of corrupt behaviour)
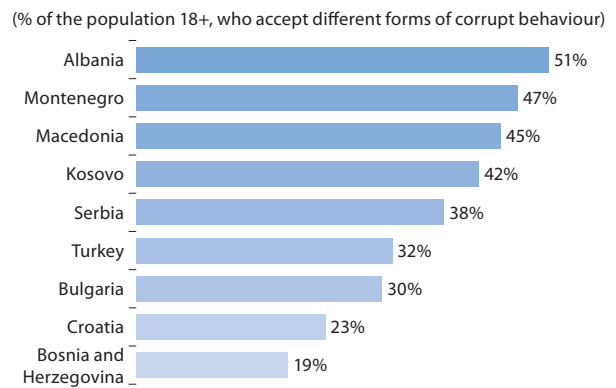
Source: SELDI/CSD Corruption Monitoring System, 2014.

- Higher levels of awareness of corruption (Bosnia and Herzegovina) are not directly linked to lower levels of administrative corruption (Turkey). Awareness reflects to a large extent the internal political debate on corruption and governance and the exposure of the public to awareness raising on the issue. Countries in which debate has been more intensive contribute to the corruption awareness of citizens but this does not directly translate into reduction of corruption behaviour.

Figure 11. Awareness (identification) of common corruption practices

(% of the population 18+ identifying common corruption practices – all (high), many (moderate) and few (low))

- High level of awareness
- Moderate level of awareness
- Low level of awareness
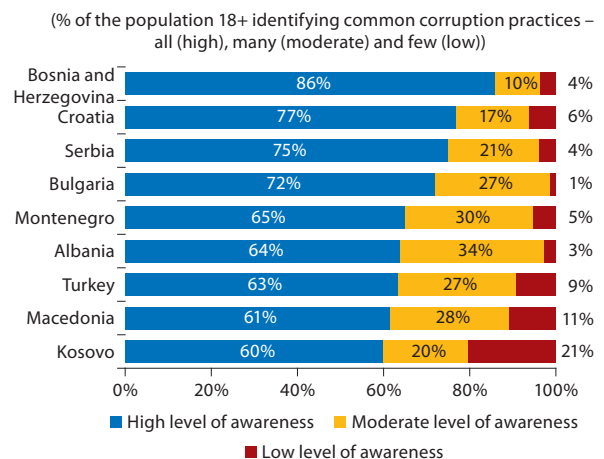
Source: SELDI/CSD Corruption Monitoring System, 2014.

- Regarding susceptibility to corruption the CMS data show that citizens in countries with similar rates of administrative corruption have substantially different structure of predisposition to corruption behaviour (e.g. Croatia and Turkey). The highest susceptibility is observed in Albania, followed by Kosovo and Macedonia. The relatively lower susceptibility in Bulgaria for example (lowest after Turkey) indicates (together with low acceptability) the integrity of the citizens which could explain why a large share of citizens who were pressed for bribes did not give any in these countries. A factor in this respect, especially regarding Bulgaria, is the role of civil society: the most intensive anticorruption campaign started in 1998 and was implemented by CSD-led *Coalition 2000*.[15] Still, the very high corruption pressure in Bulgaria, combined with the low tolerance and susceptibility to corruption, seems the most probable explanation for the highest share of mixed behaviour among the SELDI countries. People get forced to compromise on their principles by an overwhelmingly corrupt environment. At the same time, countries like Albania and Kosovo face steep challenges in their anticorruption drive, as high administrative corruption is coupled with lower levels of awareness and higher levels of acceptance.
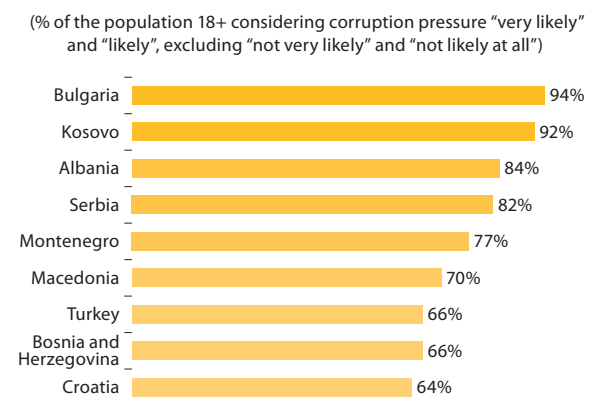
1.4. ASSESSMENTS OF THE CORRUPTION ENVIRONMENT

Assessments of the corruption environment (perceptions of corruption) are not a good proxy for measuring the prevalence of corrupt practices and the level of corruption. Rather they show the attitude of citizens towards the governance model and are a form of political evaluation of the current government. This explains why assessments of the corruption environment in a country are usually much more negative and widespread than the actual count of corruption transactions.

More than half of the population of SELDI countries believe they live in a highly corrupt environment in which it is highly likely to encounter corruption pressure when contacting public officials (Figure 13). The highest percentage of the expected corruption pressure is found in Bulgaria and Kosovo, where more than 90% of the participants in the survey believe pressure to be likely. The smallest percent is in Croatia, but even there 2/3 of the population (64%) perceive pressure to be likely. This shows that corruption is perceived as a serious problem in the whole region despite the relatively lower levels of prevalence in Turkey, Croatia and Bosnia and Herzegovina.

Figure 12. Susceptibility to corruption

(% of the population 18+ that would give and/or accept a bribe in the role of citizen and/or official)

	Susceptible to corruption	Mixed behavior	Not susceptible to corruption
Turkey	16%	26%	58%
Bulgaria	27%	40%	33%
Montenegro	31%	34%	35%
Croatia	32%	28%	40%
Serbia	33%	35%	32%
Bosnia and Herzegovina	33%	36%	31%
Macedonia	36%	36%	28%
Kosovo	41%	37%	22%
Albania	58%	34%	8%

Source: SELDI/CSD Corruption Monitoring System, 2014.

Figure 13. Likelihood of corruption pressure

(% of the population 18+ considering corruption pressure "very likely" and "likely", excluding "not very likely" and "not likely at all")

Bulgaria	94%
Kosovo	92%
Albania	84%
Serbia	82%
Montenegro	77%
Macedonia	70%
Turkey	66%
Bosnia and Herzegovina	66%
Croatia	64%

Source: SELDI/CSD Corruption Monitoring System, 2014.

Nearly three quarters of the population in Albania (73%) consider corruption inevitable and systemic and do not think that it can be substantially reduced. The highest percentages of people who are optimistic about the feasibility of anticorruption policies are in Croatia (53%) followed by Montenegro, Kosovo and Turkey (46-47% respectively). Such a finding shows that higher levels of corruption prevalence go hand in hand

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[15] http://www.anticorruption.bg

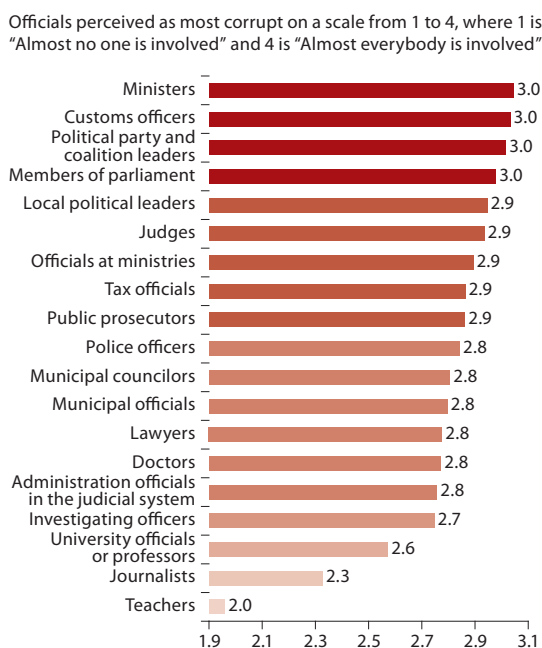with increased pessimism about the effectiveness of anticorruption policies.

The perception that all or most public officials are corrupt predominates in Southeast Europe. As an average for the region, government ministers and custom officers are perceived as the most corrupt public officials, together with political party leaders and members of parliament. Perceived as least corrupt are teachers, journalists, university professors and investigation officers. Sectors perceived as most corrupt are the highest levels of the

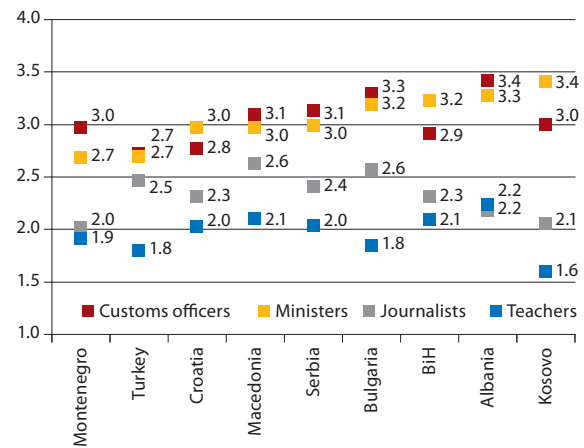**Figure 14. Feasibility of policy responses to corruption**

(% of the population 18+)

	Corruption cannot be substantially reduced	Corruption can be substantially reduced or eradicated	Don't know/No answer
Turkey	33%	47%	20%
Croatia	45%	53%	2%
Montenegro	49%	47%	4%
Kosovo	49%	46%	5%
Bosnia and Herzegovina	50%	37%	13%
Serbia	58%	35%	7%
Bulgaria	60%	39%	0%
Macedonia	61%	34%	5%
Albania	73%	26%	1%

■ Corruption cannot be substantially reduced
■ Corruption can be substantially reduced or eradicated
■ Don't know/No answer
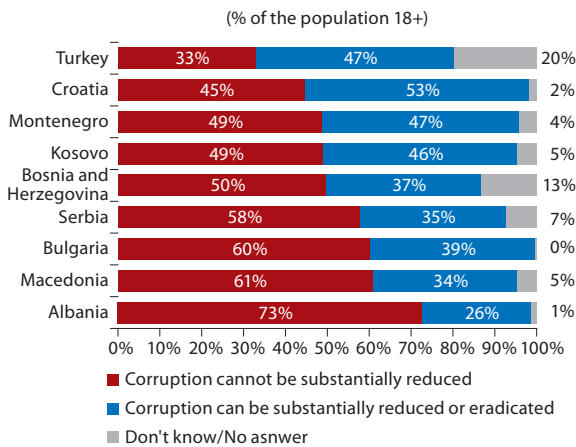
Source: SELDI/CSD Corruption Monitoring System, 2014.

Figure 15. Estimates of the corruptness of public officials – regional average

Officials perceived as most corrupt on a scale from 1 to 4, where 1 is "Almost no one is involved" and 4 is "Almost everybody is involved"

Ministers	3.0
Customs officers	3.0
Political party and coalition leaders	3.0
Members of parliament	3.0
Local political leaders	2.9
Judges	2.9
Officials at ministries	2.9
Tax officials	2.9
Public prosecutors	2.9
Police officers	2.8
Municipal councilors	2.8
Municipal officials	2.8
Lawyers	2.8
Doctors	2.8
Administration officials in the judicial system	2.8
Investigating officers	2.7
University officials or professors	2.6
Journalists	2.3
Teachers	2.0

Source: SELDI/CSD Corruption Monitoring System, 2014.

Figure 16. Estimates by the public: most and least corrupt occupations (country differences)

■ Customs officers ■ Ministers ■ Journalists ■ Teachers

Montenegro, Turkey, Croatia, Macedonia, Serbia, Bulgaria, BiH, Albania, Kosovo

Source: SELDI/CSD Corruption Monitoring System, 2014.

executive, law enforcement institutions and revenue collection agencies (most notably customs). This is just another indication that political corruption in most countries of the region is a common and far from adequately addressed problem. Citizens clearly believe that positions of power are at the top of the corruption pyramid, calling for strong action against political corruption.

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CMS results have shown that the main factors influencing corrupt behaviour of citizens in SEE countries are rooted in the interactions between citizens and officials. Corruption pressure appears to be the most potent factor that pushed people to engage in corrupt transactions. Attitudes and perception have minor importance but tend to follow the overall dynamics of corruption prevalence and determine the likelihood of success of anticorruption efforts. Results show that achieving success in terms of bringing corruption levels close to EU average is likely to require massive and sustained efforts in the next two decades. The case of Bulgaria shows that progress is reversible, and anticorruption efforts should be sustained over extensive periods of time. The case of Croatia indicates that strong conditionality before accession gives results but the anticorruption drive and institutional mechanisms need to be sustained and further strengthened.

The predominant public attitude towards corruption in the region is negative. In many countries this goes hand in hand with relatively high levels of involvement in corruption transactions: corruption has evolved into a necessary evil and this tends to discourage public

confidence in the ability of government to enforce anticorruption policies. Some of the countries, like Albania and Kosovo face considerable challenges in countering corruption, and would require wide ranging reforms. In others there is still fear among the population to disclose corruption attitude and experience, which hampers civil society activities in countering corruption. Data suggested that low administrative corruption in parts of the region, notably Turkey, Macedonia, and to some extent Serbia could be related to less political freedom and even fear of repression.

In the period since 2001 – 2002 (the first regional implementation of the SELDI CMS) most countries have registered progress[16] with respect to most CMS dimensions (indexes): lower levels of corruption pressure and involvement in corruption, lower tolerance, lower susceptibility, increased resilience, etc. In view of the initial level of corruption prevalence, however, this progress could be considered marginal. There has not been an anticorruption breakthrough in any of the countries in the region.

Unstable and controversial effects of government actions can be clearly illustrated with the case of Bulgaria: annual implementation of the CMS has shown an uneven marginal progress (reduction) with respect to administrative corruption in the period 1999 – 2013.[17] However, the 2014 round of diagnostics registered serious deterioration and has seen prevalence return to levels even higher than those observed in 2001 – 2002. Despite the introduction of the Cooperation and Verification Mechanism the country has regressed, which points to the complexity of tackling systemic and political corruption, as well as the importance of political and judicial leadership in the country for achieving progress.

In all countries future anticorruption efforts will need to deal with a major challenge: the magnitude of prevalence of administrative corruption (even in countries where it is relatively low) makes it practically impossible for law enforcement to identify and prosecute offenders. In addition, as CMS results show, oversight institutions and law enforcement are also among the primary targets of corruption.

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[16] The dynamics of corruption indexes for each country has been included in the country profiles in Chapters II and III. See also (Center for the Study of Democracy, 2002).

[17] In the period 1999 – 2003, CMS diagnostics in Bulgaria has been implemented on a quarterly basis.