

**Center for the Study of Democracy**



**OPPORTUNITIES  
FOR ESTABLISHMENT OF CENTRAL REGISTER  
OF LEGAL PERSONS AND  
ELECTRONIC REGISTRIES CENTER  
IN BULGARIA**

**Report  
of the Task Force on Registration Reform with the  
Center for the Study of Democracy**

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## TASK FORCE ON REGISTRATION REFORM

### *Report*

The report was developed by the Task Force on Registration Reform with the Center for the Study of Democracy in the period 2001 – 2003. It reflects the recommendations and proposals made in the process of its preparation by governmental institutions, non-governmental organizations, representatives of the business community, as well as Bulgarian and foreign experts. The report and other publications and materials on registration reform issues are available at <http://www.csd.bg/law/regform.htm>.

### *Composition of the Task Force*

Members of the Task Force on Registration Reform with the Center for the Study of Democracy (CSD) are notable jurists, working in the area of civil and commercial law, including:

**Dr. Silvy Chernev**, Chair of the Court of Arbitration with the Bulgarian Chamber of Commerce and Industry;

**Mr. Borislav Belazelkov**, Justice at the Supreme Court of Cassation;

**Mr. Angel Kalaidzhiev**, Associate Professor, Sofia University Law Faculty

**Mr. Stefan Kyutchukov**, Attorney-at-law, Gingov, Guginski, Kyutchukov and Velichkov Law Firm;

**Mr. Georgi Dimitrov**, Attorney-at-law, O.R.A.C. Law Firm;

**Dr. Maria Yordanova**, Director of the Law Program of the Center for the Study of Democracy;

**Mr. Dimitar Markov**, Project Coordinator at the Law Program of the Center for the Study of Democracy.

### *Activities of the Task Force*

In the period 1995 – 1997 CSD experts worked on the preparation of a modern legal framework in the area of registered pledges. As a result a **Draft Law on Registered Pledges** was developed, which was adopted by the Bulgarian Parliament in 1996. On the basis of the Law and with the active assistance of the Task Force experts, in 1997 the **Central Pledges Register** with the Ministry of Justice was established and has been successfully operating for several years now. The Central Pledges Register is the first centralized electronic register in Bulgaria.

In the beginning of 1999 the CSD Task Force concentrated its efforts on developing a proposal for legislation on introducing electronic document and electronic signature in Bulgaria ([http://www.csd.bg/law/current\\_1.htm](http://www.csd.bg/law/current_1.htm)). As a result a **Draft Law on Electronic Document and Electronic Signature** was worked out, adopted by the Bulgarian Parliament in the spring of 2001 and in force since October 7, 2001. After the adoption of the Law on Electronic Document and Electronic Signature the Task Force experts assisted the work of the State Telecommunications Commission (current Communications Regulation Commission) on the preparation of the **secondary legislation on the implementation of the Law**, further adopted by the Government in the beginning of 2002. The Law on Electronic Document and Electronic Signature is of great importance for carrying out the registration reform, since it gives a possibility for the Central Pledges Register, as well as for the other electronic registers, which will be set up, to conduct filings and provide information electronically.

### ***Proposal for a Thorough Reform of the Registration System***

In 2001 the Task Force with the Center for the Study of Democracy started working on the preparation of a proposal for a thorough reform of the registration system in Bulgaria. In the course of the work a study of the international practices in the area of establishment and operation of modern registration systems was conducted. For the purposes of the study experts from the Task Force visited Norway – one of the countries with the most advanced registration systems in Europe (<http://www.csd.bg/law/norway.htm>). During their visit they had meetings with Norwegian experts in the area of establishment and functioning of modern electronic registers and visited the Brønnøysund Register Centre. In September 2002, at the invitation of the Center for Study of Democracy, Norwegian experts visited Bulgaria and participated in a Round Table on the issues of registration reform in Bulgaria, organized by CSD (<http://www.csd.bg/law/sudreform.htm>).

### ***Governmental Position***

Even since the early preparation stages of the registration reform proposal, the Task Force has been closely cooperating with the Ministry of Justice. The Minister of Justice visited Norway together with the members of the Task Force, and representatives of the Ministry took part in the Round Table, organized by the Center. In the course of the work the Minister of Justice declared his support for the implementation of the proposed reform.

The CSD Task Force has conducted consultations on the main aspects of the proposed reform with other interested institutions and authorities as well. In December 2002 the issues of the registration reform were discussed on a joint meeting at the Ministry of Economy with the participation of the Deputy Prime Minister and Minister of Economy, the Minister of Finance, the Secretary General of the Ministry of Justice and other representatives of the respective Ministries as well as CSD senior staff. A Government decision is pending which will set off the development of the legal basis on the proposed reform and the practical achievement of its objectives (the objectives and the stages of the proposed reform are described in detail in the appended report).

# OPPORTUNITIES FOR ESTABLISHMENT OF CENTRAL REGISTER OF LEGAL PERSONS AND ELECTRONIC REGISTRIES CENTER IN BULGARIA

## Report of the Task Force on Registration Reform with the Center for the Study of Democracy

The development of market economy and establishment of democratic rule of law in Bulgaria require a reform of the registers of legal persons and the property registers in order to create a safe and transparent environment for setting up and conducting business, as well as proper conclusion and carrying out of contracts. For that purpose the registration system should also be able to provide reliable, timely and legally valid information on legal persons and real estate to the public and private sector.

The transition to a **modern centralized electronic registration system** serves the interests of business and civil society, but it also contributes to an overall stability of economic growth, reduction of the grey economy and prevention of economic crime. Another gain that shouldn't be underestimated is the revenue from fees for public services such as registration, recording of changes and provision of information.

Globalization and the constant expansion of international trade pose an increasing demand for quick, easy and cheap access to information about local and foreign economic entities. In relation to this the registration system reform in Bulgaria through the use of cutting-edge achievements and experience in the field will further the country's equal participation in international trade exchange.

### • **Current State of the Bulgarian Registration System**

At present official registers in Bulgaria are predominantly decentralized. About the only exception is the **Central Pledges Register** with the Ministry of Justice, which was introduced in 1997. This is not the case with the structural organization and state of other official registries. Legal persons with the only exception of political parties are registered by the 28 District Courts in Bulgaria and the registries kept by such courts are paper-based. The case with real estate registers is similar. These registers are maintained by the 112 Regional Courts and are paper-based although

experimental attempts have been made at various courts to introduce computer-based information systems, which however do not have any legally binding effect. (See Annex 1)

In their capacity of users, the business community, non-profit organizations, the citizenry and foreign investors tend to view the currently used registration system as ineffective, unreliable and short of transparency; they often even regard it as an area in which non-regulated pressure and corruption practices thrive. Court registration, on the other hand, being an activity, which is not part of the administration of justice, places an excessive burden on courts.

- **Modern Registration Systems and Registration Systems in the Other Transition Countries**

The practice of **administrative registration procedure** via central electronic/computer-based registries centers has long been established in quite a few developed market economies with traditional democratic institutions. Most transition countries that have not initiated any reforms yet, like the Czech Republic, face problems with legal persons' registers similar to those in Bulgaria. Recent experience shows that they might be overcome through adoption of modern registration patterns, as is the case with the Baltic States.

In recent years the USA and most EU member and candidate states have introduced or are presently setting up registration systems greatly facilitating access to and distribution of information. Their common trait en route this goal is the unified and centralized database allowing various forms of information retrieval, including electronically, via the Internet. (Annex 2)

Despite specifics and variations from country to country the following dominant trends are noticeable:

- Establishment of **administrative procedures of registration** through transfer of the register's maintenance capacity from courts to other competent bodies;
- **Centralization of existing registers** and transition to registries centers incorporating a number of constitutive (integrated) and connected registers (they are kept separately, but the information gathered in them is entered into the central register as well and its database is shared between them);



- **Transformation of existing registration systems into electronic ones** with gradual extension of possibilities for submitting and obtaining information electronically.

- **General Characteristics of the Proposed Reform in Bulgaria**

The present proposal for reform of the registration system in Bulgaria is in conformity with the Bulgarian legal environment and the needs of economic and social life. It is based on the experience of foreign modern registration systems derived from the idea of **transformation of registration procedures from judicial into administrative**. This transformation involves transfer of the register's maintenance capacity from courts to a specially established public institution within the executive branch and development of centralized and electronic registers that can guarantee quick, effective, reliable and transparent procedure.

As far as persons are concerned, the proposed reform of the registration system can be implemented parallel to the real estate reform already under way (i.e. the activities aimed at cadastre and property register establishment).

Based on an analysis of the current state of registers in Bulgaria and a comparative examination of the foreign experience in the development and operation of modern registration systems a proposal is made for creation of an **Electronic Registries Center**. The establishment of **Central Register of Legal Persons** can serve as a foundation to it; it would contain registration data for all private legal persons subject to judicial registration (with the exception of political parties and trade unions), state enterprises and other private legal persons not subject to judicial registration and all public legal persons, including their departments, which are not legal persons under Bulgarian law but can be defined as independent under the criterion in Article 18, Para (2) of the Civil Procedure Code. After completion of this step information about individuals, legal persons and securities, supplied by them, will be concentrated in one register and thus the useless duplication of information from the commercial register and the pledges register and the possibility for errors and discrepancies following from it would be avoided.

The **Electronic Registries Center** could be unified with the existing **Central Pledges Register** at the Ministry of Justice, the **Central Property Register** which is under construction, the maintained registers of entities, which are not legal persons under Bulgarian law but are subject to registration in accordance to specific laws or possess special legal capacity. Later on, the Registries Center could incorporate filings of marriage settlements to be provided for in the new Family Code whose adoption is pending.

Further, all these registers encompassed by the **Electronic Registries Centre** could be connected to the Uniform System for Registration of Citizens, the tax registers and other electronic registers, which would lead to greater security of economic turnover and considerably shorten the time for entering and obtaining information, cut maintenance costs of registers and produce a strong anti-corruption effect.

The future **Central Register of Legal Persons**, and later on the **Electronic Registries Center** could be established as a legal entity, budget or self-financed with a central authority (the Ministry of Justice, the Ministry of Economy, the Ministry of Finance, etc.), seated in Sofia. It should be managed by a director, appointed by the respective Minister. (*Annex 3*)

The Center, and before its creation the respective central registers, could have **local registration offices** opened on different levels (district or regional level with the district or regional courts).

The establishment of the Central Register of Legal Persons and the Electronic Registries Center can be based on a number of existing structural accomplishments, on which it can be directly grounded or modeled after. These accomplishments include the system and procedures, applied in the Central Pledges Register and its local registration offices, the Law on Electronic Document and Electronic Signature, the results of the several-years-long effort for setting up a National Electronic Cadastre, the structure and procedural basis created with the Law on the Cadastre and the Property Register\*. Following National Electronic Cadastre formation and its integration in a consolidated national database, the Electronic Registries Centre could include **the Central Property Register**. In this way information on persons and properties will converge in one source.

- **Organization and Funding of the Reform. Stages and Activities**

The reform of the registration system regarding the persons comprises a series of activities involving substitution of the decentralized paper-based judicial registration with registration in an electronic **Central Register of Legal Persons**. The latter will

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\* The Law on the Cadastre and the Property Register entered into force on January 1, 2001; on November 5, 2001, the Council of Ministers issued a Decision adopting a long-range program on the activities for establishing the cadastre and property register. The 5-year *Cadastre and Property Register* project of the Bulgarian Government supported by the World Bank was launched on October 3, 2001. The project administrating authorities are the Ministry of Regional Development and Public Works and the Cadastre Agency in its part concerning the cadastre, and the Ministry of Justice in the property register area. In compliance with the long-range government program, by 2005 the cadastre and property register of 29 judicial regions covering 25% of the constructed space in the country should be accomplished, while in another 19 judicial regions, controlling 31% of the territory, it should be at an advanced stage.

contain registration data on all private legal persons and state-owned enterprises (exclusive of political parties and trade union organizations).

Some of the possible sources of funding of the reform in Bulgaria could be the pre-accession funds as well as companies specialized in investments in creation of modern registers and registries centers against a percentage share of their revenues in the first years following their establishment.

The necessary legal basis on the proposed reform could be developed by a task force whose core members could be CSD experts who have taken part the drafting of the Law on Registered Pledges, the Law on Electronic Document and Electronic Signature, the Law on Not-for-Profit Legal Persons and the concept for registration system reform in the country.

The **first step** of the proposed reform could be the creation of a **Central Register of Legal Persons**. With a view to that a few legislative amendments need to be elaborated and adopted, in particular: Law on Amendments to the Law on Not-for-Profit Legal Persons, Law on Amendments to the Civil Procedure Code, and the relevant secondary legislation on the structure and activities of the register. Within this legal framework two registers should be introduced: a Central Register of Not-for-Profit Legal Persons based on the already established Central Register for Public Benefit Not-for-Profit Legal Persons with the Ministry of Justice, and a Central Commercial Register, incorporating registration data on all commercial legal persons. These two could later be unified in a Central Register of Legal Persons.

The **second step** of the reform covers the establishment of an **Electronic Registries Center**. For that purpose a Law on the Electronic Registries Center and the necessary regulations on its organization and on the maintenance of the individual constituent registers should be elaborated.

The **third step** of the registration reform involves the incorporation or linkage of existing or newly-established registers (tax registers, motor vehicles registers, property register, etc.) to the Electronic Registries Center. The respective provisions of the Law on the Electronic Registries Center will serve as its legal grounds.

## *Annex 1*

### **CURRENT STATE OF THE BULGARIAN REGISTRATION SYSTEM**

At present official registers in Bulgaria, including those of legal persons, are predominantly decentralized and paper-based. About the only exception is the Central Pledges Register with the Ministry of Justice which was introduced in 1997 as a central, electronic register for security interests in non-real estate assets (except for ships and aircrafts).\*

Unfortunately, this is not the case with other official registers which are also of great structural importance for the economy. Legal persons (commercial entities and not-for-profit organizations with the exception of political parties) are registered by the 28 District Courts in Bulgaria, that is, in separate registers throughout the country. The legislation regulations clearly follow the distinction between the activity of the court within the protecting procedure for making entries and the administrative maintenance of the register. In spite of this, the registers are actually made equal to the companies' files which contain the evidence and the statements of the court for permitting the entry: all the inquiries, company searches and certifications are made on the grounds of the company file, and when it is missing entirely or particular documents of it are not available, entries, inquiries and certifications are not actually made. Thus, a regular inquiry about the representation of a certain legal person preceding contract conclusion might require a distance of a few hundred kilometers to be covered to hand over a written application, followed by a week's interval and a further delay for information delivery; ultimately, the result is likely to be imprecise and unreliable. As information accumulates, it becomes increasingly hard to access and its usage – progressively slower and even impracticable. Obviously, this result is unfeasible in the present dynamic business environment. Economic reality shows that all kinds of contracts are largely being concluded on the basis of registered information on the legal status of legal persons that is already months old; this means that people cannot gain from safety which is the main objective of the registers' existence or, vice versa, they risk becoming "victims" of the presumption of knowledge of filed circumstances or absence of unfiled ones since they are virtually unable to check the facts.

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\* Although distance registration or information issuance from the Central Pledges Register is not yet practically applied, filing is actually performed within an hour at most from the moment the applicant enters the registration office. Comprehensive data on the pledges included in a particular person's record is supplied within the same time frame. Filing to record or certificate issuing is practically identical in Sofia and, for instance, Varna, due to the local registration offices operating at the premises of seven District Courts. The Law on Electronic Document and Electronic Signature (effective since October 7, 2001) would enable the Central Pledges Register to make entries based on electronic applications as well as issue certificates in electronic format via the Internet. This would shorten the procedure substantially and render the applicant's location insignificant. The advantages of such a mode of registration and access to the register in terms of speed, safety, and low cost, are apparent.

The case with real estate is similar. Property registers are kept by the 112 Regional Courts and the registers are still paper-based although experimental attempts have been made to introduce computer-based information systems at various Courts, which do not have legally binding effect. It is certainly problematic in terms of legal security that there are no public registers of state-owned real estate, municipally-owned real estate, as well as a great number of formerly state-owned or municipally-owned real estate, which have been incorporated in the property of private legal persons. Often, all the evidence concerning ownership of an estate exists simultaneously with a state or municipal property act whose existence couldn't have been checked up and which refutes all other evidence.

Pursuant to the currently operative Law on the Cadastre and the Property Register, the Civil Procedure Code and the Registration Rules, a Central Cadastre and a Property Register (incorporating data from the cadastre), both paper- and computer-based, are being set up. The 112 registration offices at the Regional Courts conduct entries and registration of acts (concerning real estate ownership) solely on paper.

Council of Ministers Decision No. 326 of 11.05.2001 stipulates the adoption of a long-range program concerning the activities for establishing the cadastre and the property register. Its implementation is coordinated and supervised by an interdepartmental group and is in an advanced phase. A Draft Law on Amendments to the Law on the Cadastre and the Property Register is to be completed by the end of the year. The Cadastre will be electronic, but will be kept in printed format as well. The Property Register will be entirely electronic and will be maintained by a Cadastre Agency with the Ministry of Regional Development and Public Works and a Property Registration Agency with the Ministry of Justice. Centralization of the property register and its maintenance in electronic form will allow collaborative accomplishment of the electronic registers of legal persons and the existing Central Pledges Register and its linkage with them as well as their subsequent merger into an Electronic Registries Center.

## *Annex 2*

### **MODERN REGISTRATION SYSTEMS AND REGISTRATION SYSTEMS IN THE OTHER TRANSITION COUNTRIES**

Modern registration systems are electronic and centralized and provide opportunities for online entries and certifications. They allow interested persons to convey to the knowledge of third parties any newly arisen circumstances by means of their entry, and the third parties are in effect able to check the actual state of the register simultaneously with the conclusion of the transactions.

- **Administration of the registers**

Registers' administration is performed in one of two alternative ways: either by a specially established public institution – legal person on state budget funding as is the case in **Austria** (the Federal Computing Center with the Federal Ministry of Finance), **Estonia** (Registry Center with the Ministry of Justice) and **Latvia** (Register of Enterprises) where the fees charged for the services go directly into the budget; or, as is the more widespread practice, by a self-financed fee-collecting institution – a public body (state agency) with the executive, a trade company or other legal person with or without state participation. The latter method has been adopted by **Denmark** (the Danish Commerce and Companies Agency under the Ministry of Trade and Industry), **Spain** (Central Commercial Register), **Sweden** (Patent and Registration Office), **Great Britain**, etc. This more common situation proves that the establishment and maintenance of a central register, apart from being convenient to users, may also be a successful business enterprise even when the administrating authority is part of the executive.

**Norway** has one of the most advanced registration systems in the whole of Europe. The Brønnøysund Register Centre is a government body under the Norwegian Ministry of Trade and Industry, initially, until a year and a half ago – subordinated to the Ministry of Justice. The Central Coordinating Register for Legal Entities incorporates the information on legal entities from various public registers – of business enterprises, of mortgaged moveable property, of company accounts, of bankruptcies, etc. The Central Coordinating Register for Legal Entities provides each newly registered company with a nine-digit organization number, which gradually replaces all other numbers under which this company is registered in other registers. Trade companies bear the same code as is assigned to them in the Register of Business Enterprises. The collection of such great amount of information fosters the provision of a wide spectrum of services – users can obtain standardized

information sheets and copies of documents, any information matching particular user criteria, as well as statistics processed for certain purposes or indicated concrete needs. This is how a widest possible public access to a greatest information volume is ensured, while at the same time enhancing economic and legal safety and minimizing the risk of abuse.

- **Registration and registration-related procedures**

Trade companies and other legal persons subject to registration are registered directly with the relevant central register (**e.g. Denmark, Malta, Lithuania, Sweden, Northern Ireland, Norway**), in local commercial registers (**Spain**) or local departments of the central register (**Belgium, Romania**) where information is usually stored on paper and a copy of each document is sent to a central electronic database where it is reviewed and recorded. It is at this precise moment that circumstances are deemed recorded under commercial laws. Less commonly, registration is done at primary courts (**Austria**).

Besides registration papers receipt and input of information into a unified database all centralized registers deliver a package of services facilitating quick and effective user access to practical information. Information is public and universally accessible in a variety of forms customized to user preferences – standardized information and extracts from registers (on paper or on magnetic carrier), letters, copies of documents (a fee is charged in case a certified transcript is required; users in most countries are granted access to document originals as well), or online retrieval.

- **Fees**

The payment of **fees** for the various services is settled in different ways. In Austria the fees must cover only the expenses made, while in **Estonia** part of the services are free of charge. In most of the countries, however, especially if the register is not financed through the budget, public fees are determined according to the type of information service. In **Denmark**, for instance, information related to or copies of annual reports of registered companies is provided at a certain fee by an independent self-financed company with the agency representing a central registration authority. Information is provided online via a specialized information system. A similar subscription system is employed in **Finland**, but the commercial register information is distributed by two additional providers. The **Belgian** system allows periodical information for a group of several enterprises or criteria-based data sheets. Most commonly, however, information is freely provided for a certain fee (**Great Britain, Sweden, Slovenia, Latvia, Romania, Spain, etc**). State bodies are often exempt from payment and usually information is published on the Internet.

- **European Business Register**

The existence and functioning of centralized registration institutions is of huge importance for the efficiency of business transactions. As trade across borders is constantly on the rise, correct and easily available information about foreign business enterprises has taken on growing importance, especially for small and medium businesses. This has necessitated the establishment of the **European Business Register (EBR)** presently comprising twelve European states. It connects the registration institutions of the participating countries and data is obtained through direct exchange between official registers in the respective countries. This easy transnational access to essential information is a key factor for conducting trade. The establishment of an Electronic Registries Center in Bulgaria and its subsequent inclusion in the European system of business registers would furnish the country with a wide range of possibilities for a broader and more effective participation into European commercial turn-over.



### *Annex 3*

## **PROPOSAL FOR THE ORGANIZATIONAL STRUCTURE OF THE ELECTRONIC REGISTRIES CENTER (ERC) REGISTRATION AND CERTIFICATION PROCEDURES**

The Electronic Registries Center could be established as a legal entity, budget-financed with a central authority (the Ministry of Justice, the Ministry of Economy, the Ministry of Finance, etc.), seated in Sofia. It should be managed by a director, appointed by the respective Minister. The Minister will issue Rules on the Structure and Operation of the Electronic Registries Center, which may include rules on keeping particular constitutive registries as well. The Center (and until its establishment – the Central Register of Legal Persons) will have registration offices on the District Courts' premises; the officials at the Central Register of Legal Persons and the Electronic Registries Center will have the status of civil servants in the administration.

The registers, integrated in the Electronic Registries Center, will be public and everyone will be able to make an inquiry or receive a document certifying the existence of a certain entered circumstance. For the entry, the fulfillment of inquiries and issuing certificates a state fee has to be paid at a rate, fixed in a tariff, approved by the Council of Ministers.

The entry and certificate issuance will be carried out by registration officials following application by the concerned person. The evidence for the existence of the circumstances whose entry is demanded, respectively the acts which are subjected to entry and the evidence that the state fee is paid should be appended to the entry application.

Registration can be refused only on grounds explicitly enumerated in the law. These grounds will vary for the different filing procedures in each constitutive registry, depending on whether it is acts or circumstances that are entered and on the scope of the preliminary check assigned to the respective register by the law. Thus, entry in the Central Pledges Register can be refused only if the application does not have the required contents or the state fee has not been paid. Entry in the Register of Not-for-Profit Legal Persons would be denied if any of the necessary circumstances do not exist or their entry is not requested, or the existence of any of the circumstances whose entry is requested cannot be ascertained by the appended documents, or if the state fee has not been paid.

Registration refusals will be subject to appeal under an administrative procedure before the respective Minister. The Minister's refusal will be subject to appeal under the procedure specified by the Law on the Supreme Administrative Court.

The transition to a Central Register of Legal Persons and an Electronic Registries Center would increase the efficiency of the registration system and would minimize the range of corrupt practices accompanying registration and obtaining information.

*Annex 4*

**PROPOSAL FOR THE ORGANIZATIONAL STRUCTURE OF THE ELECTRONIC REGISTRIES CENTER (ERC)**

**INTEGRATED AND CONNECTED REGISTERS**

