

Fair Market Conditions for  
Competitiveness in the Adriatic Region

# Recommendation of the Council on the Principles for Transparency and Integrity in Lobbying





## Fair Market Conditions for Competitiveness in the Adriatic Region

### Policy Briefing Note

# RECOMMENDATION OF THE COUNCIL ON THE PRINCIPLES FOR TRANSPARENCY AND INTEGRITY IN LOBBYING

#### WHY DOES THE RECOMMENDATION ON TRANSPARENCY AND INTEGRITY IN LOBBYING MATTER?

- ✓ The Recommendation of the Council on the Principles for Transparency and Integrity in Lobbying (the Principles) is the only international instrument regulating lobbying practices, offering guidance on how to meet expectations of transparency and accountability, and support a level playing field as the basis for public decision making.
- ✓ The Principles are primarily directed at decision makers in the executive and legislative branches.
- ✓ The Principles can help to enhance transparency and safeguard integrity in the public decision making process.

#### What is the issue?

Lobbying is a practice with a global reach which has both positive and negative implications. On the one hand, lobbying can provide decision-makers with valuable insights, expert knowledge, and data and it can grant stakeholders access to the development and implementation of public policies. Moreover, it can enable citizens and interest groups to present their views on public decisions. On the other hand, lobbying can have negative consequences if it is not regulated transparently. Lobbying can lead to undue influence, unfair competition, and regulatory capture to the detriment of the public interest and effective public policies when negotiations are carried out behind closed doors. Therefore, public pressure is rising worldwide to put regulation of lobbying on the political agenda.

Concerns about lobbying practices also apply to countries in the Adriatic Region. The extent to which lobbying is regulated depends on each economy's national jurisdiction. For instance, Bosnia and Herzegovina does not yet regulate lobbying activities (BIH 2018). Croatia allows for public consultations, but does not yet regulate lobbying *stricto sensu* either (RHMP 2016). Serbia on the contrary, has recently adopted a Law on Lobbying (TS 2018). While many countries are addressing lobbying-related risks, practices to influence public policies

continue to evolve. More than half of OECD countries have yet to address risks related to the interaction of lobbying groups with public officials. The OECD is working to anticipate and address these evolving challenges (OECD 2013).

To help economies build a sound framework for transparency in lobbying to safeguard the integrity of the public decision-making process, the OECD has developed the OECD Principles for Transparency and Integrity in Lobbying. This tool, which is part of the OECD strategy for a stronger, fairer, and cleaner economy, is explained in more detail in the following part.

## What is the Recommendation of the Council on the Principles for Transparency and Integrity in Lobbying?

On 18 February 2010, the OECD Council adopted the Recommendation of the Council on the Principles for Transparency and Integrity in Lobbying (the Principles). The Lobbying Principles were the first set of international guidelines for governments to address risks of undue influence, as well as inequity in the power of influence (OECD 2014a). The Principles provide decision makers with direction and guidance to foster transparency and integrity in lobbying. Decision makers may use all available regulatory and policy options in order to select measures, guidelines or rules that meet public expectations for transparency and integrity. The Principles are primarily directed at decision makers in the executive and legislative branches. They are relevant to both national and sub-national level.

Recommendations are OECD legal instruments which are not legally binding but practice accords them great moral force as they represent the political will of Adherents. There is an expectation that Adherents will do their utmost to fully implement a Recommendation. The Principles provide Adherents with directions and guidance in order to meet public expectations for transparency and integrity in lobbying (OECD 2021a). The Principles remain the only international instrument to address concerns over lobbying practices, offering guidance on how to meet expectations of transparency and accountability, and support a level playing field in public decision making (OECD 2014a).

Since the OECD adopted the Recommendation on Principles for Transparency and Integrity in Lobbying, the Principles have guided many countries that have since adopted regulations or standards on lobbying including Slovenia, Poland, Hungary etc. (see Table 1).

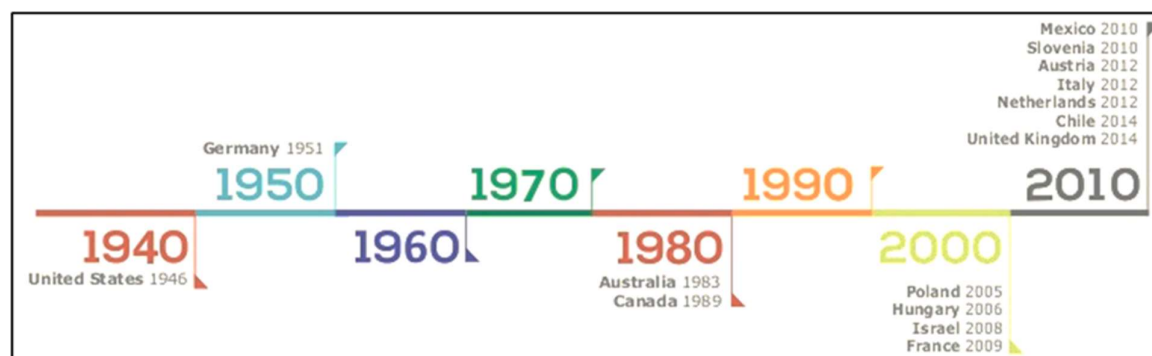


Table 1: Timeline of the adoption of lobbying regulations (OECD website 2021)

### What is lobbying?

Lobbying is defined under the Principles as the oral or written communication with a public official to influence legislation, policies or administrative decisions. It often focuses on the legislative branch at the national and

subnational levels. However, it also takes place in the executive branch, for example, to influence the adoption of regulations or the design of projects and contracts. Consequently, the term public officials include civil and public servants, employees and holders of public office in the executive and legislative branches, whether elected or appointed (OECD 2021a).

### *Who are lobbyists?*

Lobbyists have unique skills and expertise that can be leveraged to pass legislation. They can suggest legally advantageous legislative language and identify which lawmakers can be allies and which a hindrance for the success of a bill (Pugliese Associates 2021). Lobbyists can facilitate access for stakeholders to complex government decision-making processes. Their objective is to make sure that the perspectives of companies and other organisations are heard and can influence decisions in parliaments, regulatory agencies, and government entities. Lobbying for green cars, for strengthening legislation against online child sexual abuse, or for increasing competition in key economic sectors, are only a few of the examples in which lobbying can benefit not only those with a specific interest but also policy makers, by providing them additional information, and ultimately, benefiting society as a whole.

### *What are the Goals of the Principles for Transparency and Integrity in Lobbying*

The goals of the 10 Principles for Transparency and Integrity in Lobbying (OECD 2021a), summarised in Table 2 below, can be divided into four main building blocks:

1. Building an Effective and Fair Framework for Openness and Access;
2. Enhancing transparency in lobbying;
3. Fostering a culture of integrity;
4. Mechanisms for effective implementation, compliance and review.

<b>Goals of the Principles for Transparency and Integrity in Lobbying (OECD 2021a)</b>	
<b>Building an Effective and Fair Framework for Openness and Access</b>	<ul style="list-style-type: none"> <li>✓ Level the playing field by granting all stakeholders fair and equitable access to the development and implementation of public policies;</li> <li>✓ Address the governance concerns related to lobbying practices, and respect the socio-political and administrative contexts;</li> <li>✓ Be consistent with the wider policy and regulatory frameworks;</li> <li>✓ Countries should clearly define the terms 'lobbying' and 'lobbyist' when developing rules and guidelines on lobbying.</li> </ul>
<b>Enhancing Transparency in lobbying</b>	<ul style="list-style-type: none"> <li>✓ Adequate degree of transparency to ensure that public officials, citizens and businesses can obtain sufficient information on lobbying activities;</li> <li>✓ Enable all stakeholders to scrutinize lobbying activities;</li> </ul>
<b>Fostering a Culture of Integrity</b>	<ul style="list-style-type: none"> <li>✓ Foster a culture of integrity in public organisations and decision making by providing clear rules and guidelines of conduct for public officials;</li> <li>✓ Compliance with standards of professionalism and transparency for lobbyists;</li> </ul>
<b>Mechanisms for effective implementation, compliance and review</b>	<ul style="list-style-type: none"> <li>✓ Involving key actors in implementing a coherent spectrum of strategies and practices to achieve compliance;</li> <li>✓ Periodically reviewing and adjusting the functioning of country rules and guidelines.</li> </ul>

*Table 2: Goals of the Principles for Transparency and Integrity in Lobbying (OECD 2021a)*

## Why are the Principles important?

As previously stated, lobbying can be a beneficial force for democracy, but also a mechanism for powerful groups to influence laws and regulations at the expense of the public interest. Therefore, effective regulation of lobbying is crucial to maximise positive effects and to prevent the negative effects (OECD 2021 website).

The Principles help Adherents to prioritise the public interest over private interests, as well as to enhance transparency and safeguard integrity in the public decision making process (OECD 2016). While countries have increasingly opted to regulate lobbying practices, experience has shown that streamlining lobbying regulations into the wider integrity framework remains central to address lobbying-related risks effectively. It is generally accepted, that the main responsibility for safeguarding the public interest and rejecting undue influence lies with public officials, and therefore a sound public-sector integrity framework is essential (OECD 2014a).

## What can policy makers in the Adriatic region do?

The Principles can help policy makers in the Adriatic region, since they are set to reflect experiences of countries with diverse socio-political and administrative contexts and provide guidance to decision makers in the executive and legislative branches at both national and sub-national level. What is more, the Principles were developed in parallel with the European Transparency Initiative and the Code of Conduct for Interest Representatives of the European Commission and could be an important step in accordance with EU Accession plans. The following part explains in more detail which policy recommendations the four building blocks of the Principles entail (see Table 2) and how they can be put into practice.

### *Zoom into the local practices*

In **Bosnia and Herzegovina**, there is not yet a specific lobbying association or law, despite the fact that lobbying takes place on a regular basis (GRECO 2020a). However, the enactment of a legal and regulatory framework on the state level is one of the main aims of the Strategy for the Fight against Corruption 2015-2019. The need to regulate lobbying and the lack of regulatory reforms on the matter have already been highlighted by GRECO (Group of States against Corruption) from the Council of Europe and by the European Commission in its 2018 report on Bosnia and Herzegovina regarding enlargement policies (BIH 2018).

In **Croatia** lobbyists are organised through the Croatian Lobbying Association (HDL), which has its own register and binding code of conduct. However, there is not yet a specific or general law recognising lobbying and setting relevant rules and standards regarding the conduct of lobbyists and officials (GRECO 2020b). Nevertheless, it is possible to influence the legislative process through the consultation with the interested public mechanism, which exists since 2009. It allows cooperation between citizens, civil society organisations, and interested parties with public and state institutions (RHMP 2016). The Croatia Anti-Corruption Strategy 2015-2020 highlights the need to regulate lobbying and several activities have been implemented, such as an analysis for the regulation of the legal framework for lobbying and a public debate on the need and models of lobbying regulation. In addition, the Anti-Corruption Action Plan for 2019 and 2020 foresees the draft of a framework regulating lobbying. However, the initiative to regulate lobbying still remains unimplemented.

**Serbia** adopted a Law on Lobbying, which entered into force in August 2019 and the Law on Corruption Prevention, which entered into force in September 2020. Yet, the Serbian Law on Lobbying could be further improved. According to Transparency Serbia, the law is only valid for attempts to influence the content of general legal acts, and not individual decisions and it does not create any prohibitions or obligations in relation to the influence exerted by interested natural persons. There is a duty to report for both lobbyists and lobbied

persons in government bodies, where the professional intermediary is qualified as a registered lobbyist, but not for unregistered lobbyists (TS 2018).

Despite the fact that the Principles became open to non-Members' adherence in addition to all OECD Member countries through their adoption by the Council, they are not yet applicable in either of the Adriatic region countries, and Peru is the only non-Member country that adhered to the Recommendation (OECD 2021b). Yet they can serve as a useful tool for fostering integrity in the Adriatic region where lobbying is also a widespread practice.

By adopting the Principles, the countries would be able to move forward the achievement of the following goals:

### Building an Effective and Fair Framework for Openness and Access

- ✓ **Countries should provide a level playing field by granting all stakeholders fair and equitable access to the development and implementation of public policies**

Public officials in the Adriatic Region may preserve the benefits of the free flow of information and facilitate public engagement. Gaining balanced perspectives on issues leads to informed policy debate and formulation of effective policies. Allowing all stakeholders, from the private sector and the public at large, fair, and equitable access to participate in the development of public policies is crucial to protect the integrity of decisions and to safeguard the public interest by counterbalancing vocal vested interests. To foster citizens' trust in public decision making, public officials might promote fair and equitable representation of business and societal interests (OECD 2021a).

- ✓ **Rules and guidelines on lobbying should address the governance concerns related to lobbying practices, and respect the socio-political and administrative contexts**

Countries in the Adriatic region could aim to weigh all available regulatory and policy options to select an appropriate solution that addresses key concerns such as accessibility and integrity, and takes into account the national context e.g. the level of public trust and measures necessary to achieve compliance. Countries might particularly consider constitutional principles and established democratic practices, such as public hearings or institutionalised consultation processes. It would be more beneficial for countries not to directly replicate rules and guidelines from one jurisdiction to another. Instead, they could assess the potential and limitations of various policy and regulatory options and apply the lessons learned in other systems to their own context. They could also consider the scale and nature of the lobbying industry within their jurisdictions. For example, where supply and demand for professional lobbying is limited, alternative options to mandatory regulation for enhancing transparency, accountability, and integrity in public life should be contemplated. Where countries do opt for mandatory regulation, they should consider the administrative burden of compliance to ensure that it does not become an impediment to fair and equitable access to government (OECD 2021a).

- ✓ **Rules and guidelines on lobbying should be consistent with the wider policy and regulatory frameworks**

Effective rules and guidelines for transparency and integrity in lobbying should be an integral part of the wider policy and regulatory framework that sets the standards for good public governance. It is recommended that countries have to take into account how the regulatory and policy framework already in place can support a culture of transparency and integrity in lobbying. This includes stakeholder engagement through public consultation and participation, the right to petition government, freedom of information legislation, rules on

political parties and election campaign financing, codes of conduct for public officials and lobbyists, mechanisms for keeping regulatory and supervisory authorities accountable and effective provisions against illicit influencing (OECD 2021a).

- ✓ **Countries should clearly define the terms 'lobbying' and 'lobbyist' when they consider or develop rules and guidelines on lobbying**

Definitions of 'lobbying' and 'lobbyists' should be robust, comprehensive, and sufficiently explicit to avoid misinterpretation and to prevent loopholes. In defining the scope of lobbying activities, it is necessary to balance the diversity of lobbying entities, their capacities and resources, with the measures to enhance transparency. Rules and guidelines should primarily target those who receive compensation for carrying out lobbying activities, such as consultant lobbyists and in-house lobbyists. However, definition of lobbying activities should also be considered more broadly and inclusively to provide a level playing field for interest groups, whether business or not-for-profit entities, which aim to influence public decisions. Definitions should also clearly specify the type of communications with public officials that are not considered 'lobbying' under the rules and guidelines. These include, for example, communication that is already on public record – such as formal presentations to legislative committees, public hearings, and established consultation mechanisms (OECD 2021a)

#### Enhancing Transparency in Lobbying

- ✓ **Countries should provide an adequate degree of transparency to ensure that public officials, citizens and businesses can obtain sufficient information on lobbying activities**

Disclosure of lobbying activities should provide sufficient, pertinent information on key aspects of lobbying activities to enable public scrutiny. It should be carefully balanced with considerations of legitimate exemptions, in particular the need to preserve confidential information in the public interest or to protect market-sensitive information when necessary. Core disclosure requirements elicit information on in-house and consultant lobbyists, capture the objective of lobbying activity, identify its beneficiaries, in particular the ordering party, and point to those public offices that are its targets. Any supplementary disclosure requirements should take into consideration the legitimate information needs of key players in the public decision-making process. Supplementary disclosure requirements might shed light on where lobbying pressures and funding come from. Voluntary disclosure may involve social responsibility considerations about a business entity's participation in public policy development and lobbying. To adequately serve the public interest, disclosure on lobbying activities and lobbyists should be stored in a publicly available register and should be updated in a timely manner to provide accurate information that allows effective analysis by public officials, citizens and businesses (OECD 2021a).

- ✓ **Countries should enable stakeholders – including civil society organisations, businesses, the media and the general public – to scrutinise lobbying activities**

The public has a right to know how public institutions and public officials made their decisions, including, where appropriate, who lobbied on relevant issues. To achieve this, countries have to consider using information and communication technologies, such as the Internet, to make information accessible to the public in a cost-effective manner. A vibrant civil society that includes observers, 'watchdogs', representative citizens groups and independent media is key to ensuring proper scrutiny of lobbying activities. Local governments could also consider facilitating public scrutiny by indicating who has sought to influence legislative or policy-making processes, e.g. by disclosing a 'legislative footprint' that indicates the lobbyists consulted in the development of legislative initiatives. Ensuring timely access to such information enables the

inclusion of diverse views of society and business to provide balanced information in the development and implementation of public decisions (OECD 2021a).

### Fostering a Culture of Integrity

- ✓ **Countries should foster a culture of integrity in public organisations and decision making by providing clear rules and guidelines of conduct for public officials**

Responsible stakeholders should aim to provide principles, rules, standards, and procedures that give public officials clear directions on how they are permitted to engage with lobbyists. Public officials should be given the conditions encouraged to conduct their communication with lobbyists in line with relevant rules, standards, and guidelines in a way that bears the closest public scrutiny. In particular, they should cast no doubt on their impartiality to promote the public interest, share only authorised information and not misuse 'confidential information', disclose relevant private interests and avoid conflict of interest. Decision makers can also set an example by their personal conduct in their relationship with lobbyists. Countries can consider establishing restrictions for public officials leaving office in the following situations:

- Preventing conflict of interest when seeking a new position;
- Inhibiting the misuse of 'confidential information';
- Avoiding post-public service 'switching sides'.

It may be necessary to impose a 'cooling-off' period, temporarily restricting former public officials from lobbying their past organisations. Countries may consider a similar temporary cooling-off period restriction on appointing or hiring a lobbyist to fill a regulatory or an advisory post (OECD 2021a).

- ✓ **Lobbyists should comply with standards of professionalism and transparency; they share responsibility for fostering a culture of transparency and integrity in lobbying**

Governments and legislators have the primary responsibility for establishing clear standards of conduct for public officials who are lobbied. However, lobbyists and their clients, as the ordering party, also bear an obligation to ensure that they avoid exercising illicit influence and comply with professional standards in their relations with public officials, with other lobbyists and their clients, and with the public. To maintain trust in public decision making, in-house and consultant lobbyists should also promote principles of good governance. In particular, they should conduct their contact with public officials with integrity and honesty, provide reliable and accurate information, and avoid conflict of interest in relation to both public officials and the clients they represent, for example by not representing conflicting or competing interests (OECD 2021a).

### Mechanisms for Effective Implementation, Compliance and Review

The last building block of the Recommendation addresses mechanisms for effective implementation, compliance and review of the Principles. The following section depicts mechanisms for the effective implementation of the principles which could be adapted by policy makers in the Adriatic region.

- ✓ **Countries can involve key actors in implementing a coherent spectrum of strategies and practices to achieve compliance**

Compliance is a particular challenge when countries address emerging concerns such as transparency in lobbying. Setting clear and enforceable rules and guidelines is necessary, but this alone is insufficient for success. To ensure compliance, and to deter and detect breaches, countries should design and apply a



coherent spectrum of strategies and mechanisms, including properly resourced monitoring and enforcement. Mechanisms should:

- Raise awareness of expected rules and standards;
- Enhance skills and understanding of how to apply them; and
- Verify disclosures on lobbying and public complaints.

Countries in the Adriatic region can encourage organisational leadership to foster a culture of integrity and openness in public organisations and mandate formal reporting or audit of implementation and compliance. All key actors – in particular public officials, representatives of the lobbying consultancy industry, civil society, and independent 'watchdogs' – can be involved both in establishing rules and standards, and putting them into effect. This helps to create a common understanding of expected standards. All elements of the strategies and mechanisms should reinforce each other; this co-ordination will help to achieve the overall objectives of enhancing transparency and integrity in lobbying.

Comprehensive implementation strategies and mechanisms should carefully balance risks with incentives for both public officials and lobbyists to create a culture of compliance. For example, lobbyists can be provided with convenient electronic registration and report-filing systems, facilitating access to relevant documents and consultations by an automatic alert system, and registration can be made a prerequisite to lobbying. Visible and proportional sanctions should combine innovative approaches, such as public reporting of confirmed breaches, with traditional financial or administrative sanctions, such as debarment, and criminal prosecution as appropriate (OECD 2021a).

- ✓ **Countries can review the functioning of their rules and guidelines related to lobbying on a periodic basis and make necessary adjustments in light of experience**

Countries can aim to review – with the participation of representatives of lobbyists and civil society – the implementation and impact of rules and guidelines on lobbying in order to better understand what factors influence compliance. Refining specific rules and guidelines should be complemented by updating implementation strategies and mechanisms. Integrating these processes will help to meet evolving public expectations for transparency and integrity in lobbying. Review of implementation and impact, and public debate on its results are particularly crucial when rules, guidelines, and implementation strategies for enhancing transparency and integrity in lobbying are developed incrementally as part of the political and administrative learning process (OECD 2021a).

A good practical illustration of a regulatory framework of lobbying which is based on the Principles and of the challenges to be faced by policy makers in the Adriatic Region comes from the experience of the Slovenian Government with the Integrity and Prevention of Corruption Act (the IPCA). It serves as a good example, since the Act has been in force for over 10 years now and because of the geographical proximity with countries of the Adriatic Region.

## Case Study Box: Slovenia

### Regulatory framework of IPCA

The government of Slovenia has introduced a bill on public probity and, on 26 May 2010, the National Assembly adopted the Integrity and Prevention of Corruption Act (the IPCA), Chapter VIII of which regulates lobbying. The IPCA established:

- ✓ **a lobbyist register;**
- ✓ **registration requirements;**
- ✓ **lobbyists' rights and obligations.**

It also contained provisions for the supervision of lobbyists' work and set forth sanctions for breaches of regulations. Article 4 of Chapter I describes lobbying. In a nutshell:

- ✓ **Lobbying:** any non-public contact made between a lobbyist and a lobbied party for the purpose of influencing the content of or the procedure for adopting any of the above-mentioned decisions;
- ✓ **Lobbyist:** any (natural) person engaged in lobbying and entered in the register of lobbyists, or who is employed by an interest group and lobbies on its behalf, or who is an elected or otherwise legitimate representative of the interest group;
- ✓ **Lobbied persons:** officials and public servants who are employed in central and local government bodies, work with holders of public authority responsible for decision making, or who participate in the discussion and adoption of regulations, with whom lobbyists communicate for lobbying purposes;
- ✓ **Interest groups:** legal persons governed by private law and other legally regulated forms of association of natural or legal persons, on behalf and for the account of whom a lobbyist performs a lobbying activity;
- ✓ The **Commission for the Prevention of Corruption (CPC)** is an independent anti-corruption body overseeing lobbying activities;
- ✓ **Exceptions to lobbying:** actions taken by individuals and informal or interest groups with the purpose of influencing decisions by central government bodies, local self-governing bodies, and holders of public authority in consideration and adoption of regulations and other general documents directly relating to systemic issues of strengthening the rule of law, democracy, and the protection of human rights and fundamental freedoms.

### Problems with implementation and challenges for the future

Given that most European countries have not introduced legislation directly addressing lobbying yet, Slovenia is comparatively quite advanced in this area. However, the regulation could still benefit from further improvement. The IPCA was adopted within the framework of corruption prevention legislation. The resulting IPCA made clear that its lobbying provisions were to be considered as temporary in nature and that they addressed only the most essential issues of lobbying. The main issue is that the IPCA applies to registered lobbying, whereas unregistered lobbying is outside of its scope. (OECD 2014b).

*Table 3: Regulation of lobbying in Slovenia (OECD 2014b)*

## Where do we go from here?

The Principles are an important tool for policy makers in the Adriatic region to reap the rewards of positive lobbying practices, while minimising adverse effects and avoiding state capture. Despite significant advancements, further improvements are still necessary, since only Serbia directly addresses lobbying practices from the legislative point of view. Following these considerations, the way forward for policy makers in the Adriatic Region could rely on these points:

- ✓ Focusing efforts on the implementation of the Principles to strengthen confidence in the public decision-making process and restore trust in government;
- ✓ Identifying relevant data, benchmarks, and indicators relative to transparency in lobbying, the public decision-making process and, ultimately, the broader integrity framework in order to measure costs, identify benefits, and monitor performance;
- ✓ Strengthening the implementation of the wider integrity framework, as it is the prime tool for safeguarding transparency and integrity in the decision-making process in general and lobbying

practices in particular. Countries in the Adriatic Region could seize the opportunity to reflect on new integrity challenges and constraints and identify innovative and cost-effective measures;

- ✓ Review policies for managing conflict of interest to ensure that revolving door practices and the unbalanced representation and influence of advisory groups are effectively mitigated. Adriatic Region countries would benefit from highlighting and sharing good practices so as to identify the conditions for policies and practices that effectively safeguard the integrity of the public decision-making process and contribute to building trust in government (OECD 2014a).

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POLICY BRIEFING NOTES  
**FAIR MARKET CONDITIONS FOR COMPETITIVENESS  
IN THE ADRIATIC REGION PROJECT**

High levels of corruption and lack of transparency are key constraints to economic growth and competitiveness in many countries worldwide. The Policy Briefing Notes, designed for stakeholders from the Adriatic Region, aim to provide practical guidance to tackle corruption, foster integrity and level the playing field for all firms. They draw on OECD guidelines, legal instruments and good practices and are tailored to the region's circumstances.

The Policy Briefing Notes are one output of the three-year OECD project to promote fair market conditions for competitiveness in Bosnia and Herzegovina, Croatia, and Serbia, supported by the Siemens Integrity Initiative. Through Collective Action, government officials from the region along with business leaders, anti-corruption experts and practitioners, civil society representatives and academics have engaged to jointly identify country-specific challenges to integrity and foster fair market competition.

These efforts are part of the engagement of the OECD South East Europe Regional Programme, which collaborates with the region since 2000 to foster private sector development and competitiveness, improve the investment climate and raise living standards for an inclusive and sustainable future for the people of South East Europe.

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