**Online Appendix**

Supplementary Material for

Corina Lacatus and Ulrich Sedelmeier: ‘Does monitoring without enforcement make a difference? The European Union and anti-corruption policies in Bulgaria and Romania after accession’

**1. Methodological approach & coding reliability**

According to the principles of qualitative content analysis provided by methodological scholarship (Mayring 2000), systematic text analysis is based on the creation of categories of text that are initially identified and then revisited. In this case, broader categories were defined on the basis of assessment benchmarks included in the country reports, and demand/recommendation categories are defined on the basis of demands/recommendations by the European Union for compliance, included in the CVM reports. Data were coded according to the thematic category that was the most appropriate. Such categories consist of ‘idea clusters’ that share features and resist reductive essentialization (Spiro and Jehng 1990). At the second stage, coding made use of wholistic grading, ranking the degree of compliance with a certain demand/recommendation based on explicit mentions in the text of the country reports. Each statement was ranked as: 0=area of concern or no progress; 1=little/insufficient progress; 2=some progress; 3=very good/substantive progress or complete implementation. Coding was done manually followed the same set scheme for all reports issued for both Bulgaria and Romania,

 To make sure that our coding was systematic, we carried out both inter-coder and intra-coder reliability tests. The inter-coder reliability test produced a coefficient of agreement of 0.80, which is in the high range of acceptable agreement (Krippendorff 2004: 241). As an additional test of coding reliability, one of the coders performed coding of all codes for EU demands/recommendations several months after the initial coding was completed. The intra-coder reliability test produced a coefficient of agreement of 0.85, which is also in the high range of acceptable agreement.

Krippendorff, K. (2004) *Content analysis: an introduction to its methodology*, 3rd ed., Thousand Oaks CA: SAGE.

Mayring, P. (2000) ‘Qualitative Content Analysis’, *Forum: Qualitative Social Research* 1(2), available at http://www.qualitative-research.net/index.php/fqs/article/viewArticle/1089/2385.

Spiro, R. J. and Jehng, J. (1990) ‘Cognitive flexibility and hypertext: Theory and technology for the non-linear and multidimensional traversal of complex subject matter’, in D. Nix and R. J. Spiro (eds) *Cognition, Education, and Multimedia*. Hillsdale, NJ: Erlbaum.

**2. Additional figures representing the CVM report assessments for individual anti-corruption benchmarks (and separate scores for each bi-annual report)**

**Figure 1**: Compliance with the CVM in Romania according to individual anti-corruption benchmarks

**Figure 2**: Compliance with the CVM in Bulgaria according to individual anti-corruption benchmarks

**Figure 3:** Compliance with the CVM in Romania (RO) and Bulgaria (BG) (average of all anti-corruption benchmarks)

**3. Coding scheme: main categories per country**

**Bulgaria**

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| Benchmark | Indicator |
| 4. Conduct and report on professional, non-partisan investigations into allegations of high-level corruption. Report on internal inspections of public institutions and on the publication of assets of high-level officials  |
|  | Adopt and implement a comprehensive strategy to fight corruption  |
|  | Streamline and coordinate the implementation of the plan to fight corruption |
|  | Streamline coordination and activity by "National Anti-Corruption Council of Coordination" |
|  | Set up and implement measures to protect whistleblowers  |
|  | Set up and monitor the implementation of a legal and institutional framework to verify asset declarations of high public officials (Inspectorate dedicated to this NAO also has authority over verifications) |
|  | Ensure and speed up the systematic and rigorous judicial follow-up on allegations of high-level  |
|  | Increase effectiveness of pre-trial investigation  |
|  | Increase support for anti-corruption programs involving expert assistance, assessment guidance |
|  | Increase the capacity, effectiveness and Independence of Inspectorates within State Administration  |
|  | Increase capacity and strengthen power of the regional anti-corruption councils (prosecutors’ offices) |
|  | Establish and strengthen capacity of State Agency of National Security (SANS) |
|  | Set up and increase transparency of checking mechanisms for asset declaration (Asset Forfeiture Commission, in 2018 the National Agency Anti-Corruption) |
|  | Strengthen staffing capacity and activity of National Audit Office  |
|  | Increase the number of high-level corruption cases, the effectiveness of investigations, and speed up processing times  |
|  | Create and support legal and institutional framework to tackle cases conflict of interest (CPACI created in 2011) |
|  | Increase public transparency and availability of citizen information on- and offline regarding cases of conflict of interest and high-level corruption in general |
|  | Ensure good management of EU funds/combat EU funds fraud  |
|  | Establish and carry out prevention and (ex ante and ex-post) control measures at the administrative level, tackling public procurement irregularities including through PPA) |
|  | Strengthen the capacity of the General Inspectorate to the Council of Ministers, investigating public administration  |
|  | Establish a network of specialised prosecutors, including with specialization in financial crimes |
|  | Specialised Court and Prosecution (established in 2012, but broad mandate, overloaded with cases, and not effective) |
|  | Adopt effective pro-active investigative strategies  |
|  | Ensure reporting of activities toward the two benchmarks and communication with international enforcement bodies |
|  | Establish single national institution focused on high-level corruption |
|  | Increase cooperation amongst existing specialised (prosecution and investigatory) institutions |
| 5. Take further measures to prevent and fight corruption, in particular at the borders and within local government |
|  | Set up and implement measures to control corruption at border stations  |
|  | Raise awareness of and implement measures to monitor and combat conflict interest and corruption in the vulnerable fields of education and health  |
|  | Establish and support partnerships with civil society in combatting corruption in vulnerable sectors, such as health and education |
|  | Carry out the training of local and regional administration |
|  | Carry out training/strengthen capacity of police and magistrates |
|  | Adopt and improve the Integrated Strategy for Prevention and Counteraction of Corruption and Organised Crime  |
|  | Increase transparency in public administration of all levels (including through BORKOR)  |
|  | Ensure the prosecution of corruption cases at local level |
|  | Strengthen the institutional framework in capacity and scope for the investigations of inexplicable wealth cases  |
|  | Set up systems of monitoring, evaluation of risk of corruption and disciplinary sanctions in public administration (Ministry of Interior is a successful model starting 2015) |
|  | Implement reforms of National Customs Agency (increase its effectiveness and support its collaboration with the National Revenue Agency) |
|  | Adopt and implement National strategy to combat low-level corruption  |
|  | Increase transparency in service provision, with a focus on the regional and municipal levels  |
|  | Combat corruption occurring at duty-free shops and petrol stations |
|  | Increase effectiveness of legal and institutional framework for control of corruption in certain problematic areas such as vote-buying, land swaps, forest swaps and political party financing  |
|  | Establish and implement effectively a strategic legal framework for the financial management and control of public procurement at the local level (institutions: SFIA, NAO and PPA) |
|  | Strengthen the capacity and effectiveness of the Public Procurement Agency |
|  | Curb election fraud  |
|  | Create and implement sectorial anti-corruption measures in Ministry of Interior  |

**Romania**

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| Benchmark | Indicator |
| 2. Establish an integrity agency with responsibilities for verifying assets, incompatibilities and potential conflicts of interest, and for issuing mandatory decisions on the basis of which dissuasive sanctions can be taken |
|  | Create, maintain and implement the law on the National Integrity Agency  |
|  | Establish, consolidate and support ANI  |
|  | Maintain and improve ANI track record of cases |
|  | Implement sanctions as follow-up to ANI decisions |
|  | Impact of ANI more widely (as reflected in other areas of practice/public offices and internationally) |
|  | Ensure the independence of ANI & the National Integrity Council and also more broadly |
|  | Increase the effectiveness of ANI powers to investigate and issue decisions on which dissuasive sanctions can be taken |
|  | ANI ensure and increase cooperation/coordination of ANI with other high-level state authorities and the prosecution |
|  | Disseminate publicly information on ANI |
|  | Provide human/ financial & infrastructure resources for high-level corruption |
|  | Implementation of legislation on incompatibilities as well as the implementation of court decisions regarding unjustified assets or conflict of interest and incompatibilities |
|  | Set up and implement ex ante checks and prevention activities (for potential conflict of interest, like PREVENT) |
|  | Wealth declaration (especially of candidates in local elections; new electoral law) |
| 3. Continue to conduct professional, non- partisan investigations into allegations of high- level corruption  |
|  | Establish and ensure good functioning of specialised prosecution services (DNA) |
|  | Continue to improve track record on high-profile cases with the indictment of well-known and influential public figures |
|  | Carry out non-partisan investigations (Parliament is seen as an open threat as of 2017) |
|  | Ensure rigour and shorten the duration of cases of prosecution (caused by HCCJ, but improved significantly after 2010-11) |
|  | Secure the quality and stability of the anti-corruption legal framework  |
|  | Provide sufficient general financial support to fight against corruption (including EU funds) |
|  | Public trust in anti-corruption fight based on tackling high-level corruption and DNA |
|  | Draft and disseminate online training guides for courts, by High Court for Cassation and Justice (HCCJ) |
|  | Continue to maintain HCCJ track record of high-level corruption cases and improve its effectiveness  |
|  | Improve Parliament awareness/support of anti-corruption fight  |
|  | New Criminal Code and Code for Criminal Procedures, offering clearer framework for fighting corruption (in line with GRECO, too) |
| 4. Take further measures to prevent and fight against corruption, in particular within the local government  |
|  | Support and carry out projects to raise public awareness on corruption |
|  | Strengthen capacity (and integrity) of local public officials  |
|  | Improve quality of local public services/increase transparency and streamline local services |
|  | Establish and implement preventive measures in health and education fields |
|  | Increase support for/awareness of anti-corruption in education and health sectors  |
|  | Encourage and increase civil society support for/awareness of anti-corruption, especially in education and health sectors  |
|  | Design & implement & monitor comprehensive local anti-corruption strategy with a focus on vulnerable sectors and local public administration |
|  | Establish he Green Help line/TELVERDE |
|  | Establish new protocol with NGOs (AID) on the National Integrity Centre - local plans to promote integrity |
|  | Implementation of the new NGO protocol and support involvement of civil society |
|  | Support research and ensure collection of complaints/signals of corruption |
|  | Carry out investigations and sanctioning of public officials (DGA and Prosecutor General) |
|  | Take measures to improve good administration of EU funds/indictment of EU fraud  |
|  | Improve law enforcement and information sharing, across sectors |
|  | Strengthen legal and institutional capacity to carry out cases on public procurement |
|  | Fight petty and medium-level corruption at the local level, through prevention and pursuit of cases (DNA medium-evel and General Prosecution for low-level) |
|  | Carry out investigation and cases of corruption of border police and customs staff (DGA and DNA) |
|  | Increase efforts with regard to cases of asset recovery, public procurement and the prosecution of money laundering (ANAF/National Procurement Agency and National Agency for the Management of Seized Assets newly created) |
|  | Increase efforts with regard to cases of conflict of interest, unjustified wealth, incompatibility |
|  | Set up and use National Anti-Corruption Strategy (NAS 2012-2015) to carry out prevention work (identify corruption-risk areas and design preventive and educational measures) |
|  | Put in place and implement public procurement mechanisms (PREVENT) |