

ROLE OF OECD ANTI-CORRUPTION NETWORK IN FIGHTING CORRUPTION IN EASTERN EUROPE AND CENTRAL ASIA

Anti-Corruption Network for Eastern Europe and Central Asia (ACN)

The Anti-Corruption Network for Eastern Europe and Central Asia (ACN)¹ was established by national governments, civil society organisations, international organisations and donor agencies at the regional workshop “Combating Corruption in Transition Economies” convened by the OECD and the USAID in October 1998 in Istanbul, Turkey. The main objective of the ACN is to support exchange of experience, mutual learning and development of best practices in the field of fighting corruption in the region. To reach this objective the ACN organises a range of activities, including General Meetings to discuss achievements, challenges and emerging priorities on the anti-corruption agenda in this region, and expert seminars to address selected priority issues in more detail. The ACN also undertakes research studies and prepares analytical papers to provide practical reference materials to practitioners in the region. The Secretariat of the ACN is based at the OECD Anti-Corruption Division². Information about the ACN activities is provided on the ACN website.³

In addition to the activities involving all countries of the region, the ACN has also served as an umbrella for several sub-regional initiatives over the past decade. The Baltic Anti-Corruption Initiative (BACI) for Estonia, Latvia and Lithuania was launched in 2001, and was completed in 2004; since then, the Baltic States have joined the EU and one – Estonia – was invited to accede to the OECD. The Stability Pact Anti-Corruption Initiative (SPAI) for Albania, Bosnia and Herzegovina, Croatia, Serbia, Montenegro, FYR of Macedonia, Moldova and Romania was launched in 2000. In 2004 the Secretariat was transferred from the ACN to the SPAI Regional Secretariat Liaison Office (RSLO), which in 2007 was transformed into the Regional Anti-Corruption Initiative (RAI) with a Secretariat in Sarajevo (Bosnia and Herzegovina).

In 2003, a new initiative was proposed to the ACN countries which did not participate in any other specialised sub-regional programme or initiative, focusing on the countries of the former Soviet Union. Common history and the

Russian language were among important factor which allowed this diverse group of countries to be grouped into one regional initiative – known as Istanbul Anti-Corruption Action Plan.

Istanbul Anti-Corruption Action Plan

Invitations to participate in this new initiative were extended to all the countries of the former Soviet Union not involved in other ACN sub-regional programmes. The ACN Secretariat developed a draft Anti-Corruption Action Plan for this sub-region and presented it to governmental officials for consideration during preparatory country visits. The main objective of this Action Plan was to help these transition economies address high levels of corruption by bringing them closer to international anti-corruption standards, involving them in international dialogue and exchange of experiences, and equipping them with the OECD peer review methods.

It is important to note that participation in this initiative is on a *voluntary basis*. Initially, six countries accepted the invitation to join this new Anti-Corruption Action Plan: the governments of Armenia, Azerbaijan, Georgia, Russia, Tajikistan and Ukraine formally announced this decision at a special session of the ACN General Meeting in September 2003 in Istanbul, Turkey. Two more countries joined later: Kyrgyzstan immediately after the Istanbul meeting in October 2003, and Kazakhstan in December 2004.

As mentioned, the Russian Federation joined the Istanbul Action Plan at the time of its official launch in September 2003. However, this country did not complete the full programme. It submitted a self-assessment report, but did not attend a review meeting; as a result, no recommendations were adopted and no monitoring was carried out. It is expected, however, that the Russian Federation will be subject to an anti-corruption review in the framework of its accession to the OECD, which started in 2008.

While these eight countries are the main targets of the Istanbul Action Plan, its implementation involves other ACN and OECD countries and international organisations, including the Council of Europe’s Group of States against Corruption (GRECO). Since the launch of the Action Plan, these countries and organisations have delegated experts to participate in review and monitoring of the Istanbul Action Plan countries and participated in the work of the Istanbul Action Plan Advisory Group.

Civil society plays an important role in the implementation of the Istanbul Action Plan, which varies from country to country. It can involve development of “shadow” country reports, participation in special NGO panels during on-site

monitoring visits and participation in ACN plenary meetings, which discuss and adopt review and monitoring reports. TI Georgia went even further – it supports an NGO coalition which continues permanent monitoring of government efforts to implement the Istanbul Action Plan recommendations.

As stated previously, the State Parties to the OECD Anti-Bribery Convention participate in the implementation of the Istanbul Action Plan in various ways. In addition to delegating their experts to examine individual countries and participating in special international panels during on-site visits and in plenary meetings, they also provide voluntary contributions to finance the implementation of this initiative. Switzerland, Norway and Italy were the main donors to the Istanbul Action Plan.

Table . Voluntary contributions and other support of the Istanbul Action Plan, 2003-2007

Agency	Contribution	Purpose
Secretariat		
OECD		Support the ACN Secretariat, including staff costs of 1 programme manager and 1 assistant
		Operational costs, including translation of documents, use of OECD meeting facilities, interpretation during meetings, other overhead, etc.
Voluntary contributions		
Switzerland SECO	EUR 100 000	Development and endorsement of the Action Plan; preparation of the reviews programme and first review meeting (travel and per diem for delegates, fees for experts)
Norway	EUR 40 000	Second review meeting (travel and per diem for delegates, fees for experts) and preparation of publication of country review reports
Italy	EUR 40 000	Third review meeting (travel and per diem for delegates, fees for experts) and preparation of the publication of country review reports
EU	EUR 30 000	Review of the Russian Federation, fourth review meeting (through a bilateral programme for Russia)

Switzerland SECO	EUR 100 000	Preparation of the monitoring programme, including on-site missions and one monitoring meeting (travel and per diem for delegates)
<i>Total</i>	<i>EUR 310 000</i>	
Other support		
SECO	Direct financing of an expert	Support to the ACN Secretariat, including consultancy fees for the team leader for the monitoring process
Canada	Direct financing of a project	Development of the glossary of international anti-corruption legal standards (through a bilateral programme with Ukraine)
US	Financing of a separate project	Development of a Study of Models of Specialised Anti-Corruption Institutions (through a bilateral project with Ukraine)
Slovenia, Bulgaria, Latvia, Lithuania, Estonia, US, Canada, Italy, Norway, Romania	Country experts	Nomination of national officials to act as review and monitoring experts for the Istanbul Action Plan countries
UNDP, UNODC, ABA	International experts	Experts' participation in the review and monitoring process
UNDP, OSCE, Soros Foundation, Council of Europe	Additional financial and logistical support to delegates	Support for the civil society and official delegates' participation in the review meetings (travel and per diem), hosting meetings during on-site visits

Peer review and monitoring

Peer review and evidence-based policy dialogue are the main working methods of the OECD – they have been the core of the Istanbul Action Plan approach. Peer review involves mutual assessment and development of recommendations for individual member countries by other member countries through an open dialogue among governments, as opposed to the assessment of individual countries carried out by foreign and external agencies. In a peer review process the participating countries agree on rules and procedures equal for everybody and delegate their own officials to carry out the assessment. The participating countries also take responsibility for implementing the recommendations adopted in such assessment processes – peer pressure being the main tool to support the enforcement.

The country review and monitoring procedures were prepared by the Secretariat, and adopted by the Istanbul Action Plan members. These procedures draw on the experience of the OECD Working Group on Bribery, and take into account the experience of GRECO. The implementation of the Istanbul Action Plan during 2003-2007 involved the following stages:

- *Reviews of legal and institutional frameworks for fighting corruption and adoption of recommendations* (similar to the Phase 1 reviews carried out by the Working Group on Bribery). Reviews were based on status reports prepared by the governments following standard guidelines. Groups of peer review experts from ACN and OECD countries reviewed these self-reports and developed draft assessments and recommendations. Plenary meetings of the Istanbul Action Plan discussed and adopted country assessment reports and recommendations based on consensus. Reviews were completed during 2003-2005. (For more information about the reviews, please refer to “Terms of Reference for the Review of Status Reports”, 2003, “Guidelines for Status Reports”, 2003.)
- *Updates on measures taken by governments to implement the recommendations* (similar to the Tour de Table of the Working Group on Bribery). Self-reports describing measures taken to implement the recommendations were regularly prepared by the governments of the Istanbul Action Plan countries and presented for information and discussion at each plenary session, which took place once or twice per year between 2004 and 2007.
- *Country examinations to assess progress in implementing recommendations and adoption of monitoring reports* (similar to Phase 2 reviews of the Working Group on Bribery). Country examinations are based on answers to Monitoring Questionnaires prepared for each country, and include on-site visits by a group of experts – or peers – from other ACN and OECD countries. On the basis of the answers to the questionnaire and information gathered during the on-site visit, the expert groups developed draft monitoring reports, which included assessment of progress and ratings for all recommendations as fully, largely, partially or not implemented. The draft monitoring reports were presented for discussion and adoption at Istanbul Action Plan plenary meetings. Examinations were completed during 2005-2007. (For more information about the examinations, please refer to “Terms of Reference for the Monitoring of National Actions to Implement Recommendations”, 2005.)

Figure 2. Istanbul Action Plan

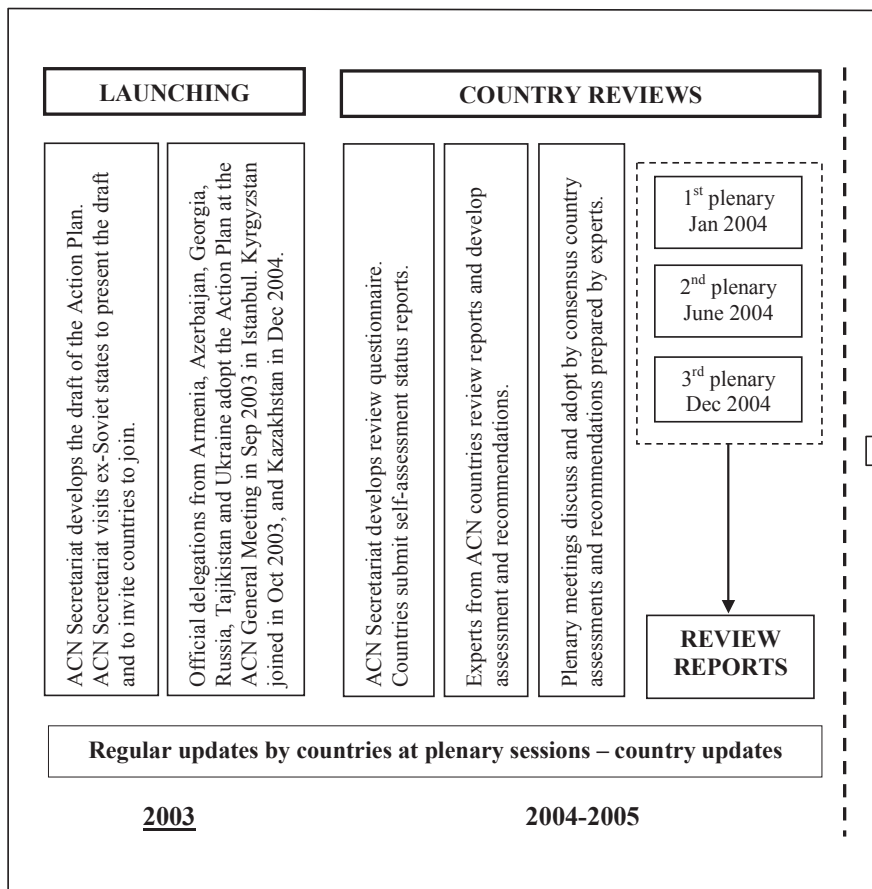
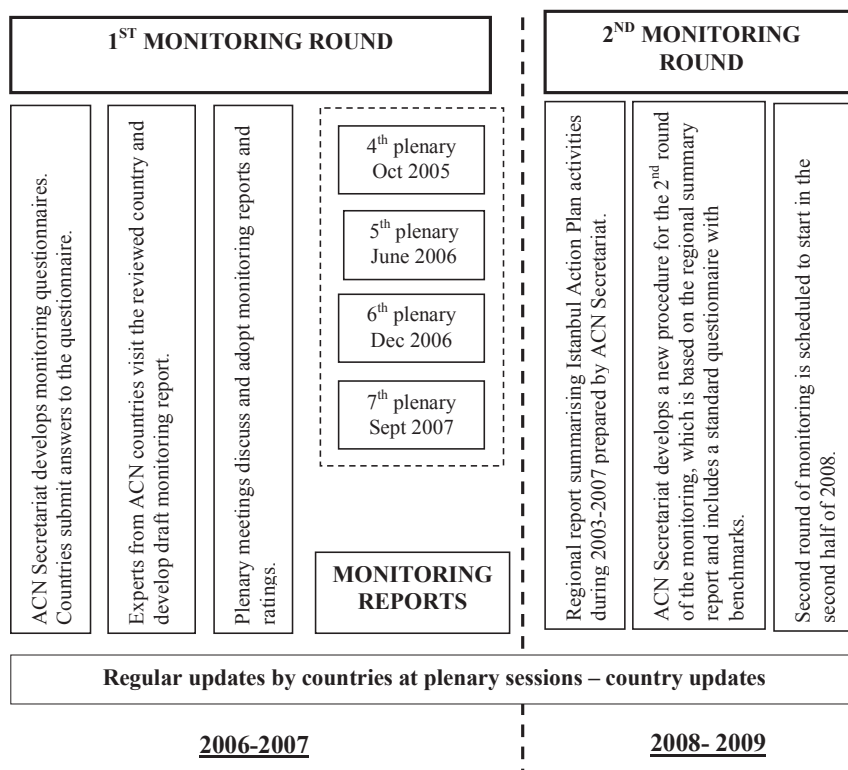


Figure 2. Istanbul Action Plan (cont.)



Country reviews and recommendations adopted in the framework of the Istanbul Action Plan cover three main areas: (1) anti-corruption policies and institutions, (2) criminalisation of corruption and law enforcement, and (3) preventive measures in public service and financial control.

The structure of the country recommendations is the same for all countries, but substantive recommendations are individual and specific to each country. It is therefore difficult, or even impossible, to compare countries simply by comparing monitoring ratings.

While the methodology for Istanbul Action Plan reviews and monitoring builds on the practices of the OECD Working Group on Bribery and GRECO, there are some important differences. The ACN Advisory Group also identified a number of methodological challenges, which will need to be addressed in the future. A non-exclusive list of such methodological differences and challenges includes:

- *The scope of country reviews and monitoring* under the Istanbul Action Plan is much broader than the scope of examinations by the OECD Working Group on Bribery (which focus on foreign bribery), or by GRECO (which address a limited number of issues selected for each examination round). Such a broad approach allows for a comprehensive and holistic assessment of a country. But, at the same time, it is difficult to ensure sound and even quality for all areas of assessment, which require a variety of specialised expertise. Additionally, although the scope is broad, it still does not cover some important issues such as corruption in political bodies or the judiciary, assets recovery or corruption in the private sector.
- The reviews and monitoring under the Istanbul Action Plan, as well as the OECD and GRECO procedures, aim to *examine not only adopted laws, but also their implementation and enforcement*. This is a challenging task for all countries in the world. In the transition economies it is further complicated due to challenges in finding case law and law-enforcement statistics related to corruption, and a lack of analytical and sociological studies related to corruption in various sectors. There are other methodological challenges in assessing a country's overall progress in addressing corruption, e.g. in *measuring political will to fight corruption*, which is the main pre-requisite for any real progress.
- The criteria for country reviews and monitoring are based on *multiple and evolving standards*. The OECD Working Group on Bribery

examines its member states against the provisions of the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions and related legal tools; GRECO uses the Council of Europe Criminal Law Convention against Corruption and the 12 Guiding Principles as its benchmark. The broad scope of the Istanbul Action Plan requires the use of multiple standards, the OECD and GRECO legal instruments together with a range of other benchmarks including emerging and often-unrecorded best practices or common approaches. The recent UN Convention against Corruption provided a useful, comprehensive set of standards for a large number of issues examined under the Istanbul Action Plan.

- The Istanbul Action Plan used a *consensus approach* in its reviews and monitoring. This differs from the “consensus minus one” approach of the OECD Working Group on Bribery – where a country under examination must abstain from the vote and accept the consensus judgement of the rest of the group – and can reduce the level of criticism or ambition of recommendations. Mutual examination between countries with limited expertise in fighting corruption can sometimes result in recommendations below the highest international standards. However, this softer approach was a useful tool for developing a group spirit among the countries, based on equal treatment and taking into account the specific situation in each country and varying levels of economic, social and political development. The consensus approach also reinforces the countries’ commitment to implement the recommendations of this legally non-binding programme.
- *The role of the governments, experts, donors and of the Secretariat* is equally important under the Istanbul Action Plan. Initially, the Secretariat took the lead in elaborating review and monitoring procedures, while the official delegates from the Istanbul Action Plan countries played a passive role and adopted proposed procedures without major comments. However, during 2003-2007 the ownership of the Istanbul Action Plan by the member countries visibly increased. The role of experts from the region in the monitoring programme has been growing rapidly; their level of participation in strategic decision making is also on the rise. The OECD member states which fund the Istanbul Action Plan participate in the Advisory Group guiding its Work Programme.

Country reviews, updates and monitoring reports are made public immediately after their adoption, and are available in English and in Russian on the ACN website www.oecd.org/corruption/acn.

Future regional anti-corruption activities

The first round of country examinations was completed between 2003 and 2007, including reviews, monitoring and updates. Upon its completion, the participating countries agreed that the monitoring process should be continued. They instructed the ACN Secretariat to develop a new procedure for the second round of monitoring. They also identified several features which should be reflected in this new procedure, including:

- The next round of monitoring should aim to update the ratings from the first monitoring round, and should also allow for the review of existing recommendations in order to update those which have become outdated, cancel those which are no longer valid, and possibly add new and different recommendations. The UN Convention against Corruption can serve as the main guiding standard for this monitoring, together with the OECD and Council of Europe anti-corruption legal tools, and other best practices.
- The next round should be dynamic, allowing ratings to be updated as quickly as possible in order to reflect progress made by countries, but not too fast to jeopardise quality; on-site visits and plenary adoptions of country reports should remain an important element of the monitoring programme to ensure high quality, objectivity and equal treatment of the assessments.
- Special focus should be on the preparatory stages, including development of the standard questionnaires for all monitored themes, which will also allow for better comparison among countries, and sufficient time for preparation of the assessment before the on-site visits.
- Qualification and expertise of the monitoring experts is one key element to ensure high-quality assessments. It is therefore important for countries to nominate their best experts for this work. The Secretariat should develop a roster of experts based on these nominations, to ensure that expertise is available for all monitored themes. The Istanbul Action Plan should also provide training and preparation for experts before the on-site visits.

- The implementation of the Istanbul Action Plan has been financed through voluntary contributions of OECD member states, with limited co-financing by the participating countries. It will therefore be important to secure new grants for the second round of monitoring, and to increase the share of co-financing by the Istanbul Action Plan countries.

It is important to note that when the Istanbul Action Plan was launched, only one country (Georgia) was the member of Council of Europe's GRECO. Since then, Armenia, Azerbaijan, Russia and Ukraine have also joined this anti-corruption monitoring programme. Additionally, many Istanbul Action Plan countries have ratified, or intend to ratify, the UN Convention against Corruption and will be covered by the monitoring programmes of this convention when it is developed. It is therefore important to ensure proper co-ordination among Istanbul Action Plan, GRECO and UNCAC monitoring activities. This can be achieved by harmonising monitoring procedures, participating in others' evaluation processes including on-site visits and meetings, exchanging reports, and other approaches. It may also be useful to foresee a sunset clause for the Istanbul Action plan, when UNCAC monitoring becomes fully operational and covers all the countries in the region.

The main focus of the Istanbul Action Plan during 2003-2007 was the review and monitoring programme, which aims to maintain peer pressure on countries. However, pressure alone is not sufficient – especially when countries are requested to implement significant reforms in challenging and rapidly developing areas of public policy, where there are no ready-made, easily available or universal solutions. Major technical assistance programmes implemented by bi-lateral donors and international organisations in all Istanbul Action Plan countries support individual agencies and corruption-related projects. However, many conceptual problems remain unclear, and require analytical work and cross-country exchange in order to formulate best practices. For example, countries are told ensure effective declaration of assets for public officials – but there is still very little guidance how this can be done in practice.

In the next phase of Istanbul Action Plan implementation, peer learning and development of best practices be given equal priority as the monitoring work. This, however, will largely depend on available resources. OECD member states – together with the governments of the Istanbul Action Plan countries – should provide funding, if they believe this work is important. The Secretariat will also explore further possibilities of co-operation with other international organisations, including the Council of Europe, UNODC, OSCE, UNDP and others.

Conclusions

The main achievements and future challenges of the Istanbul Action plan are:

- *The Istanbul Action Plan is a productive process, which has delivered two main results: specific improvement in anti-corruption legislation and institutions, and building up human capital and anti-corruption expertise in the region. More specifically, the Action Plan resulted in practical reforms of anti-corruption legislation and institutions, which were recommended in the peer reviews and enforced by the monitoring procedure. It also provided a practical learning process for country experts, who significantly improved their knowledge of international anti-corruption standards and monitoring procedures, and built a very valuable capacity necessary to promote in-country reforms and to ensure effective international co-operation.*
- *The Istanbul Action Plan received high visibility at the country level. Public officials from a large number of institutions, foreign missions, and international and civil society organisations were well aware of the country reviews and monitoring, participated in meetings and submitted comments to the country reports. This high visibility was a useful tool for mobilisation of political attention for anti-corruption issues among all key public institutions, and provided useful pressure for speeding reforms in different sectors.*
- *The Istanbul Action Plan benefited from strong ownership by the participating countries. They recognised that this process did not aim to solely criticise countries, but to identify problem areas and propose practical solutions based on experiences of both their neighbours and more advanced OECD countries. The regional approach was an important factor, as the peer review and monitoring processes were carried out by experts from countries with shared history, comparable starting conditions and recognisable cultural transitions. However, it was also important that experts from more advanced tradition economies (e.g. new EU members) and OECD member states participated and shared their experience.*
- *It has been a cost-effective programme: a large amount of work was implemented with a relatively small financial and human resources commitment. This was possible due to a combination of factors: a small but stable Secretariat at the OECD, effective use of donor grants, significant intellectual inputs and even limited financial*

contribution by governments of the transition countries, and support of many international organisations and NGOs.

- *Building on the work carried out during 2003-2007, Istanbul Action Plan countries agreed to continue the monitoring process in order to maintain the reform momentum achieved at present. They also decided that future monitoring should be more structured to provide clear benchmarks to countries, to help compare countries progress in a healthy competition, and to steer the process to support UNCAC implementation.*
- *Finally, the peer pressure provided by the Istanbul Action plan should be supported by peer learning to help countries implement reforms in conceptually difficult areas. Such peer learning should focus on analysis of regional and international approaches and development of best practices in new and unexplored areas. This would also help technical assistance programmes supported by donors and international organisations at the country level.*

NOTES

1. The ACN involves the anti-corruption officials from Eastern Europe and Central Asia (Albania, Armenia, Azerbaijan, Belarus, Bosnia and Herzegovina, Bulgaria, Croatia, Estonia, Georgia, Kazakhstan, Kyrgyzstan, Latvia, Lithuania, Moldova, Montenegro, Romania, Russia, Serbia, Slovenia, Tajikistan, Ukraine, Uzbekistan and Turkmenistan) and some OECD countries. It also involves international organisations and multi-lateral development banks (UNDP, UNODC, OSCE, Council of Europe, EBRD, World Bank), civil society, business, professional and think-tank associations (Transparency International, American Bar Association and many others) actively working to fight corruption in the region.
2. The Anti-Corruption Division at the Directorate for Financial and Enterprise Affairs (DAF) at the OECD is the secretariat to the OECD Working Group on Bribery – the body responsible for monitoring implementation of the OECD Convention on Combating Bribery of Foreign Public Officials in International

Business Transactions. The ACN is one of the outreach programmes of the Working Group on Bribery, together with the OECD/ADB Asia-Pacific Anti-Corruption Initiative, Latin American anti-corruption programme, and emerging work on the Middle East and North Africa (MENA). For more information please refer to www.oecd.org/daf/nocorruption.

3. For more information about ACN activities, please refer to www.oecd.org/corruption/acn.

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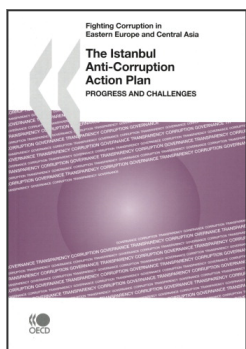
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