

Strasbourg, 30 September 2004

**Public**  
**Greco RC-I (2004) 7E**

## **First Evaluation Round**

### **Compliance Report on Latvia**

Adopted by GRECO  
at its 20<sup>th</sup> Plenary Meeting  
(Strasbourg, 27-30 September 2004)

## **I. INTRODUCTION**

1. GRECO adopted the First Round Evaluation Report on Latvia at its 9<sup>th</sup> Plenary Meeting (13-17 May 2002). This Report (Greco Eval I Rep (2002) 2E) was made public by GRECO, following authorisation by the authorities of Latvia, on 17 May 2002.
2. In accordance with Rule 30.2 of GRECO's Rules of Procedure, the authorities of Latvia submitted their Situation Report (RS-report) on the measures taken to follow the recommendations on 2 January 2004.
3. At its 13<sup>th</sup> Plenary Meeting (24-28 March 2003), GRECO selected, in accordance with Rule 31.1 of its Rules of Procedure, Czech Republic and Finland to provide Rapporteurs for the compliance procedure. The Rapporteurs appointed were Mr Robert FREMR on behalf of Czech Republic and Mr Kaarle LEHMUS on behalf of Finland. The Rapporteurs were assisted by the GRECO Secretariat in drafting the Compliance Report (RC-Report).
4. The RC-Report was adopted by GRECO, following examination and debate pursuant to Rule 31.7 of the Rules of Procedure, at its 20<sup>th</sup> Plenary Meeting (27-30 September 2004).
5. Under Article 15 para. 6 of the GRECO Statute and Rule 30.2 of the Rules of Procedure, the objective of the RC-Report is to assess the measures taken by the authorities of Latvia and, wherever possible, their effectiveness in order to comply with the Recommendations contained in the Evaluation Report.

## **II. ANALYSIS**

6. It was recalled that GRECO in its Evaluation Report addressed 15 recommendations to Latvia. Compliance with these recommendations is dealt with below.

### **Recommendation i.**

7. *GRECO recommended that Latvian authorities continue implementing appropriate preventive policies based on codes of conduct for all officials and education and information for Latvian society as a whole, so that everyone is aware of his/her rights and obligations.*
8. The authorities of Latvia have reported that one of the most significant measures in the field of preventing and fighting corruption in Latvia was taken in October 2002: the setting-up of the Corruption Prevention and Combating Bureau (hereafter the Bureau). The Bureau is composed of a staff of approximately 120 officials and its activity is threefold: corruption prevention, investigation of cases of corruption and building public awareness. It is also tasked to co-ordinate the implementation of anti-corruption measures in state and local government institutions. The Bureau has prepared "The National Strategy for the Prevention and Elimination of Corruption", which was adopted by the Cabinet of Ministers on March 2004. The Bureau performs the following functions in the area of the prevention of corruption:
  - develop anti-corruption strategies and prepare the national anti-corruption programme;
  - supervise the proper implementation of the law "On Prevention of the Conflict of Interests in the Activities of State Officials", as well as any other additional restrictions for State officials provided in legal acts;

- analyse corruption prevention practices in the State and local government institutions and of cases of corruption detected;
  - develop methodologies for preventing and combating corruption in the State and self-government authorities as well as in the private sector;
  - analyse legal acts and draft legal acts and propose possible amendments thereto;
  - educate the public with regard to legal and ethical aspects;
  - keep the public informed about the tendencies of corruption in the country, the cases detected and the measures taken for preventing and combating corruption;
  - check declarations of state officials within the scope defined by the law "On Prevention of the Conflict of Interests in Activities of the State Officials".
9. The Latvian authorities have also stated that a certain number of state institutions (the State Revenue Service, the Control Service, the State Audit Office etc.) have drafted their own internal codes of conduct.
10. GRECO took note of the information provided by the Latvian authorities and acknowledged that the creation of the Corruption Prevention and Combating Bureau demonstrates that corruption issues have increasingly been considered as serious matters in Latvia. It also took note of the important tasks that are carried out by the Bureau aimed at preventing the further development of corruption in the country and that civil society. GRECO was pleased that media and civil society are considered as key partners in the preventive activities of the Latvian governmental institutions. As regards the part of the Recommendation related to codes of conduct for all officials, GRECO noted that only few state agencies have drafted their own codes of ethics and that there is no unified code of conduct for all civil servants officials, as it was already stated in the Second Evaluation Report on Latvia (paragraph 41): "The GET noticed that there is no unified code of ethics for civil servants; there exists only general 'Principles of Conduct for Civil Servants', approved by the Government. (...). The GET recommends that measures to be taken to enhance the adoption of codes of ethics for civil servants of all state and employees of local government institutions."
11. GRECO concludes that recommendation i. has been partly implemented.

**Recommendation ii.**

12. *GRECO recommended that the corruption prevention programme should continue to be implemented, particularly on the following issues:*
- *increasing public awareness of the danger that corruption represents for the stability of democratic institutions and economic and social progress;*
  - *informing the public about the measures adopted to combat corruption, the penalties that may be imposed for it and the institutions involved in fighting corruption which may be contacted by the public;*
  - *enhancing the involvement of the media and non-governmental organisations in a co-ordinated awareness-raising campaign.*
13. The authorities of Latvia have reported the following:
- as regards the first part of the recommendation (increasing public awareness of the danger of corruption), the Bureau – which is the institution responsible for developing an anti-corruption policy and coordinating its implementation -, in coordination with Latvian television, regularly

informs the public of the dangers of corruption. In particular, they have created three informative and educative programmes that aim at raising public awareness of the origin of corruption, the opportunities to prevent it and the necessity of controlling the financing of political parties;

- as regards the second part of the recommendation (informing the public about the measures against corruption), since the Bureau was established in October 2002, its specialists in public relations have been keeping the public informed about the measures taken for combating corruption, the penalties applied to the corruptive offences and the institutions involved in the fight against corruption. The Bureau web site [www.knab.gov.lv](http://www.knab.gov.lv) contains all relevant and updated information regarding the activities carried out for preventing and combating corruption in the country;
  - as regards the third part of the recommendation (involving media and NGO's), media and non-governmental organizations, such as "Transparency International Latvian Branch - Delna" or "Self Government Alliance", are very much actively involved in governmental activities and policies aiming at increasing public information on corruption.
14. GRECO took note of the significant efforts made by the Latvian authorities to implement corruption prevention programmes, including in cooperation with members and institutions of civil society involved in the fight against corruption. It welcomes this positive approach and encourages Latvia to continue acting in this way in the future.
  15. GRECO concludes that recommendation ii. has been implemented satisfactorily.

#### **Recommendation iii.**

16. *GRECO recommended that the resourcing of the fight against corruption be improved.*
17. The authorities of Latvia have reported that since the GRECO First Evaluation visit took place, the Corruption Preventive and Combating Bureau was set up (October 2002). Its budget amounted to 1,660,000 LVL (approximately 2,500,000 euros) in 2003 and increased considerably to 2,858,530 LVL (approximately 4,300,000 euros) in 2004.
18. GRECO took note of the information provided by the Latvian authorities and concludes that recommendation iii. has been implemented satisfactorily.

#### **Recommendation iv.**

19. *GRECO recommended that the scope of the Corruption Prevention Council be extended to ensure the effective implementation of its objectives.*
20. The authorities of Latvia have reported that after the GRECO First Evaluation visit took place, the Crime and Corruption Prevention Council (hereafter the CCPC) was created and replaced the two existing Councils: the Crime Prevention Council and the Corruption Prevention Council. The CCPC is headed by the Prime Minister. Its tasks and functions have been considerably extended from those of the Corruption Prevention Council : they include, *inter alia*, coordinating and supervising all State authorities' activities in the field of the prevention of crime and corruption; supporting civil society's involvement in anti-corruption policies ; promoting prevention plans with regard to organised crime and corruption and supporting criminological research. It is also entitled to make proposals for the development of draft legal acts and the implementation of justice and

home affairs policies to ensure the coordination of activities within institutions fighting crime and corruption, as well as the co-operation of Latvian institutions with international institutions.

21. GRECO took note of the reforms mentioned by the Latvian authorities. Merging the two existing institutions in a single governmental agency (the Crime and Corruption Prevention Council) can be seen as a significant step towards improving the efficiency and competence in fighting crime and corruption. In any case, GRECO considered that the scope of this new institution has been extended as requested by recommendation iv and, therefore, concludes that recommendation iv. has been implemented satisfactorily.

**Recommendation v.**

22. *GRECO recommended to promote coordination experience, sharing and circulation of information among different police forces involved in anti-corruption investigations, in particular by establishing an anti-corruption operational working group with a multi-agency focus and above all more proactive investigative strategies.*

23. The authorities of Latvia have reported:

a) as regards “to promote coordination experience (...) among different police forces involved in anti-corruption investigations”

- the Bureau is entitled to work with other State and foreign institutions. It also cooperates with the State Police, the Security Police, the State Revenue Service, the Prosecutor General Office and other law enforcement authorities which are involved in combating corruption in Latvia ;
- the Economic Police Department (EPD) within the State Police Criminal Police Headquarters (SPCPH) is responsible for the investigation of cases of corruption in the private sector ;
- the Organised Crime Combating Department (OCCD) within the SPCPH is responsible for preventing and detecting corruption offences related to organised and economic crimes. It coordinates all investigations conducted by its regional bureaus ;
- the State Police Internal Security Bureau is in charge of the prevention and detection of corruption cases among police officers;
- the Financial Police Department within the State Revenue Service (SRS), which is empowered to carry out (pre-trial) investigations, coordinates its operational activities with other law-enforcement authorities (the SRS Customs Criminal Department, the Economic Police Department, the Security Police, the Bureau and others). The SRS is also entitled to investigate offences committed by customs officers.

b) as regards “to promote (...) sharing and circulation of information among different police forces involved in anti-corruption investigations”

- the exchange of information between the Service on Prevention of Laundering of Proceeds of Crime and “other institutions” (especially with the Financial Police and the Economic Police) has been promoted by paying special attention to investigative methods related to cases on money laundering, including those related to corruption offences.

24. GRECO took note of the information provided by the Latvian authorities. The main concern expressed in recommendation v. relates to the fact that, at the time of the Evaluation visit, there were "(...) a range of policing institutions that contribute to the fight against corruption. (...) that their efforts [were] segmented and disjointed and that there [was] an obvious lack of direction and co-ordination (...)" (First Evaluation Report, paragraph 90). GRECO recognised that the creation of the Corruption Prevention and Combating Bureau has considerably improved the co-ordination and the efficiency of the Latvian global approach to the problem of corruption prevention policy. Nevertheless, it appears obvious that the situation in the specific field of the investigation of corruption cases is still fragmented: a quite long list of different law enforcement bodies empowered to carry out investigative operations related to corruption cases was mentioned by the Latvian authorities and there were no clear guidelines regulating their interaction. As regards the second part of the recommendation, the Latvian authorities only mentioned the exchange of information between the Service on Prevention of Laundering of Proceeds of Crime and "other institutions" insofar as cases of money laundering are concerned. No mention was made of the sharing of information, at the investigative level, among the different police forces involved in the fight against corruption, as had been recommended.

25. GRECO concludes that the recommendation v. has been partly implemented.

#### **Recommendation vi.**

26. *GRECO recommended to introduce a corruption intelligence system with operational functions, to include research in vulnerable sectors and development of early intervention strategies.*

27. The authorities of Latvia have reported that a Division of Special Investigative Activities and Analysis has been established within the Bureau to evaluate the efficiency of the investigative activities carried out in the field of corruption. This institution aims at determining whether special activities of the Bureau are in conformity with legal acts, policies, strategic plans and financial resources. To ensure efficient implementation of special investigative activities of the Bureau, the Division is entitled to make recommendations, analyses and research on the risk factors and carry out proactive strategy investigations. Moreover, a Corruption Analysis and Counteraction Methods Development Division has also been set up within the Bureau. This Division examines the corruption prevention policies, the cases of corruption detected in various State and local government institutions, as well as in the private sector. Further, it is empowered to suggest practices to prevent and methods to combat corruption based on the results of these analyses.

28. GRECO took note of the information provided by the Latvian authorities and concludes that the recommendation vi. has been implemented satisfactorily..

#### **Recommendation vii.**

29. *GRECO recommended to extend the powers of the State Revenue Service Corruption Prevention and Control Division to encompass disclosure from banking institutions regarding information on an individual's financial account.*

30. The authorities of Latvia have reported that since the GRECO First Evaluation visit took place, the Bureau took over from the State Revenue Service Corruption Prevention and Control Division the task of carrying out control over the state officials' financial statements and therefore it is entitled to ask and receive information from financial institutions related to a criminal case under investigation and upon the Prosecutor General's authorisation. Such powers have been

established for preventing policies on conflicts of interests in the activities of state officials but also to clarify annual financial activities of political organisations and their associations.

31. GRECO took note of the information provided by the Latvian authorities and concludes that recommendation vii. has been implemented satisfactorily.

**Recommendation viii.**

32. *GRECO recommended to make more effective use of the existing legislative tools provided to discover and combat corruption and in particular those concerning the use of special investigative technical means in the detection of corrupt behaviour.*
33. The authorities of Latvia have reported that the *Seima* (the Parliament) has adopted on second reading the new Criminal Procedure Code (1<sup>st</sup> April 2004) which includes a chapter on “Special Investigative Activities”. This special chapter provides rules on investigative activities carried out by using special investigative means. They have also underlined that in order to detect offences related to corruption, the Latvian law enforcement agencies regularly make use of the measures provided in the “Law on Special Investigative Activities”, and especially those related to surveillance of a suspect, undercover operation, interception of communication.
34. GRECO took note of the information provided by the Latvian authorities and concludes that the recommendation viii. has been implemented satisfactorily.

**Recommendation ix.**

35. *GRECO recommended to implement measures to ensure effective monitoring of police actions, including corruption. Such measures should ensure a degree of independence to the investigators.*
36. The authorities of Latvia have reported that the measures related to the monitoring of Police internal activities were taken by the State Police Internal Security Bureau, established on 30 April 2003 and operating in direct subordination to the Chief of the State Police. They also emphasised that the Security Bureau is independent from any other State Police structural units in its decision-making process and that the measures for the prevention and detection of the violation of law made by the personnel of the State Police, including in the sphere of corruption, have been analysed, planned and coordinated more efficiently since the Internal Security Bureau was set up.
37. GRECO took note of the information provided by the Latvian authorities and concludes that the recommendation ix. has been implemented satisfactorily.

**Recommendation x.**

38. *GRECO recommended that one of the existing units within the Prosecutor General’s Office dealing with corruption cases be responsible for training, support and sharing of practice to other units involved in the fight against corruption. The unit should give support to the territorial prosecution offices and develop a higher level of cooperation with policing institutions.*
39. The authorities of Latvia have reported that the Prosecutor General adopts a plan of activities for the Prosecutor’s Office every six months, aimed at raising awareness on how to apply specific rules of the Criminal Law: guidelines and “informative letters” are prepared and sent to all

prosecutor's offices. They have also reported a detailed series of training activities covering economic crimes issues (including corruption) organised for prosecutors (see paragraph 42 below).

40. GRECO took note of the information provided by the Latvian authorities. It considered that the general concern about the training of prosecutors in the field of corruption is (satisfactorily) dealt with in recommendation xii. On the contrary, the recommended setting up of an unit within the Prosecutor General's Office dealing with corruption cases, which would be given specific responsibility for training, support and sharing of practice to other units involved in the fight against corruption has not been addressed.
41. GRECO concludes that recommendation x. has been partly implemented.

#### **Recommendation xi.**

42. *GRECO recommended that judges be guaranteed satisfactory legal and financial status; to significantly increase the means allocated to the courts in order to improve their functioning.*
43. The authorities of Latvia have reported that in June 2003 amendments to the law "On Judicial Power" and to the Regulations N° 213 of the Cabinet of Ministers on "The Rules of Remuneration of the Personnel of the State Administration Bodies, Prosecutor's Office and Courts" have been adopted, which considerably increased the salaries and the social guarantees of judges and court personnel. For example, since 1 January 2004 the remuneration of judges has increased up to 70% from the basic salary as determined for the year 2006.
44. GRECO took note of the information provided by the Latvian authorities and concludes that the recommendation xi. has been implemented satisfactorily.

#### **Recommendation xii.**

45. *GRECO recommended to continue appropriate training - in particular on the typologies of corruption and the unique challenges of investigation, including its international dimension – be organised for police officers, prosecutors and judges dealing with corruption and connected offences.*
46. The authorities of Latvia have reported that several training activities on the prevention of and fighting against corruption have been organised for police officers, prosecutors and judges :
  - seminars and courses on methods to prevent and fight corruption annually attended by 20/30 officers of the Financial Police (some of those seminars were organised in other countries, i.e. USA, Belgium, UK). In addition, officers of the Financial Police have been participating in the PHARE programme dealing with "Effective Prevention, Combating and Control of Organised Crime";
  - a conference and two seminars for the Criminal Police staff in 2003;
  - two seminars attended by staff of the Bureau, the State Police, the Prosecutor's Office and the courts, co-organised by the Bureau and the USA and German embassies;
  - a training visit to the USA (called "Corruption and Organised Crime Prevention and Combating") for representatives of the Bureau and the Prosecutor's Office;
  - seminars in Brussels ("Combating Corruption"), in Budapest ("Octopus Programme"), in Tallinn (OECD Convention), in Riga ("On Combating Economic and Financial Offences and

Corruption”) and a course of lectures on “Anti-corruption Strategy in the Post-communist Region: Proposals for Latvia” attended by prosecutors during the period June 2002 – December 2003;

- a series of seminars (within the PHARE project “Corruption Prevention in the Court System”) attended by judges in 2003.

47. GRECO took note of the information provided by the Latvian authorities. It invites the Latvian authorities to provide additional information on the percentage of police officers, prosecutors and judges who have attended those trainings.
48. GRECO concludes that recommendation xii. has been dealt with in a satisfactory manner.

#### **Recommendation xiii.**

49. *GRECO recommended to raise information campaigns on the existence and possibility of use of the Witness Protection Programme which certainly will encourage persons to come forward in the confidence that the prosecution authorities will provide protection. As a result, witnesses will be able to testify against key corrupt officials without fear of reprisal.*
50. The authorities of Latvia have reported that prosecutors and investigators have to inform every person involved in a criminal process about the special procedural measures provided by the Witness Protection Programme (article 106 of the Criminal procedure Code of Latvia). This programme aims at protecting every person whose testimony could threaten his personal or family life. They have also reported that funds have been granted by a specific PHARE project to organise an information campaign (due to start on the second half of 2004) on special procedural protection for witnesses : the main objectives of the campaign is to prepare informative leaflets and to make them available during the court sessions; to put information on the “Latvian Courts Portal” and to organise a two-days seminar for judges and prosecutors and a two-days seminar for mass-media representatives. Seminars organised within the PHARE project “Development and Strengthening of Corruption Prevention and Combating Bureau” are also planned for the staff of the Bureau, the State Revenue Service, the State Police and the Prosecutor’s Office. These seminars will cover *inter alia* issues of witnesses protection.
51. GRECO took note of the information provided by the Latvian authorities and concludes that the recommendation xiii. has been implemented satisfactorily.

#### **Recommendation xiv.**

52. *GRECO recommended that measures, in addition to those already planned and adopted, be taken to minimise the risks of corruption opportunities in the public procurement area:*
  - *to provide proper training to all those public officials who deal with procurement activities in the central and local agencies in order to make them aware of the regulation in force and ensure that they would be able to assess procedural irregularities in the context of evidencing corruption;*
  - *to consider improving competition mechanisms at level of local government authorities in order to avoid excessive familiarity between officials and suppliers, leading to direct orders being placed without applying tendering procedures, such as, for instance, collective decision-making procedures, rotation of officials deciding on purchases, specific supervision of contracts concluded directly etc.*

53. The authorities of Latvia have reported:

a) as regards the first part of the recommendation :

➤ that the Procurement Monitoring Bureau (hereafter the PMB) has been set up and has taken up its functions on 1 January 2002. The PMB monitors the conformity of the procurement procedures with the requirements of the legal acts regulating procurement activities, provides methodological assistance and consultations and organises training for institutions (contracting authorities), for sellers of goods, providers of services and performers of construction work. It organises seminars dealing with issues such as violations of legal acts relating to the regulation of procurement activities and requirements to be followed up in organising procurement activities. Officials of those authorities supervising the legitimacy of the state and local government procurement activities (for instance, personnel of the State Control and the Bureau) receive the appropriate knowledge to be able to state any violation in the procurement procedure, which often is connected with the state officials' corruption. Moreover, the Methodology Department of the PMB carries out some specific activities that can be summarised as follows:

- drafting of methodological materials: specialists of the Methodology Department prepare a series of supplementary materials of methodological nature to carry out different procurement procedures. Guidelines on the legality of procurement procedures are available at the web page of the PMB ( [www.iub.gov.lv](http://www.iub.gov.lv) ).
- practical training: specialists of the Methodological Department in cooperation with different regional agencies participated in seminars and practical trainings held in Riga and major cities of Latvia. The Methodological Department also arranged a series of educational courses. In 2002 personnel of the PMB held 52 seminars regarding law implementation, listened to by the audience of 1717 people. In the first half of 2003, 44 seminars were held, which were attended by 980 employees.
- consultations: specialists of the Methodology Department provided consultations on all issues to the institutions involved in the procurement procedure. Such consultations were carried out by post, telephone and the Internet.

The Information Division of the PMB developed a number of standard document forms. These documents contain information regarding the announcement of the procurement procedure, decision making, etc.

b) as regards the second part of the recommendation :

➤ The law "On Procurement for State or Local Government Needs" defines a general principle that a contracting authority may not set any requirements for tenderers or candidates that provide more advantageous conditions for a particular tenderer or candidate than for the others, or which otherwise restrict competition. To date, full competition among the tenderers is being provided only in the procurement activities carried out in the procurement method – called "open competitions". If the amount of a contract does not exceed LVL 10,000 (approximately 15,000 euros) - or LVL 50,000 (approximately 75,000 euros) for construction works -, there is no need to arrange an open competition, as procurement activities may be conducted by applying the simplified method of purchasing – called "the request for a price quotation". In the case of the

request for a price quotation it is required to send an invitation for at least three possible tenderers to sell goods, provide services or perform construction work in accordance with the requirements. In such a case it is possible that the purchasing manager (contracting authority), deliberately and for its own interest, will chose his favourite tenderer. Taking this situation into account, the Bureau is drafting amendments to the rules regulating procurement activities that would establish that invitations should be sent to more tenderers, in the case of the request for a price quotation. As regards the mechanism for eliminating the drawbacks in the procurement activities of local governments, the decision on entering into a contract of procurement with a particular tenderer is a collegiate decision, which takes each evaluation made by the members of the procurement commission into account. The PMB compiles and analyses the statistical information with respect to the state and local government funds used in procurements. In its turn, the Bureau checks if the state officials are in any conflict of interests and pays attention to the use of the state-owned and the local government-owned financial resources by the state officials.

54. GRECO took note of the information provided by the Latvian authorities, acknowledged with satisfaction the measures taken by Latvia in the public procurement area and concludes that the recommendation xiv. has been implemented satisfactorily.

#### **Recommendation xv.**

55. *GRECO recommended to establish guidelines for the Deputies of the Saeima, and especially its Presidium, containing criteria to be applied when deciding on requests for the lifting of immunities. Moreover, to ensure, that in the case of judges, decisions concerning immunity are free from political consideration, and are based only on the merits of the request submitted by the Prosecutor General.*
56. The authorities of Latvia have reported that guidelines on criteria to be applied when deciding on requests for the lifting of immunities of members of Parliament have not been established, but discussions concerning the legal definition of deputies' immunities have occurred. As regards the judges' immunities, they have reported that any criminal proceeding against a judge can be initiated by the Prosecutor General only and that decisions concerning immunities of judges are free from political influence. A judge may not be taken into custody nor called to criminal responsibility without the Parliament's consent. Before giving its consent, the Legal Committee of the Saeima has to formulate its opinion on legal aspects, on the basis of information provided by the General Prosecutor.
57. GRECO took note of the information provided by the Latvian authorities and considered that the concern expressed in recommendation xv. on the need to establish clear guidelines for the Deputies of the Saeima containing criteria to be applied when deciding on requests for the lifting of immunities of members of the Parliament has not been addressed.
58. GRECO concludes that the recommendation xv. has not been implemented.

### **III. CONCLUSIONS**

59. In view of the above, GRECO concludes that Latvia has implemented the vast majority of the recommendations of the First Round Evaluation Report. Recommendations ii, iii, iv, vi, vii, viii, ix, xi, xii, xiii, xiv have been implemented satisfactorily or dealt with in a satisfactory manner.

Recommendations i, v, x have been partially implemented, and recommendation xv has not been implemented.

60. GRECO invites the Head of the delegation of Latvia to provide additional information by 31 March 2006 on the progress of the implementation of recommendations i, v, x and xv.