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## PARAGUAY REPORT

### Follow-up on the Lima Agreement

### Citizen Corruption Observatory

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**Country:** Paraguay

**Local partner:** Semillas para la Democracia

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## Acronyms used in the Document

CCO= Citizen Corruption Observatory  
Redlad: Latin American and Caribbean Network for Democracy  
CFA = Citizen Forum of the Americas  
PASCA = Civil Society Participation in the Summit of the Americas  
CSO = Civil Society Organizations  
OAS= Organization of American States  
NGO = Non-Governmental Organization





## Introduction

The main purpose of the project titled “Citizen Corruption Observatory (CCO) - Follow-up on the Lima Agreement” is to strengthen the Citizen Forum of the Americas (CFA) by co-creating, together with the Latin American and Caribbean Network for Democracy (REDLAD, by its Spanish initials) and the Citizen Forum of the Americas (CFA), an observatory that provides technical support to the implementation of the Project titled: “Civil Society Participation in the Summit of the Americas (PASCA, by its Spanish initials). Within the framework of the activities developed by the CCO, the progress of the Lima Agreement was monitored using a methodology that took into account both policy and practical developments, and which was based on the participatory discussion of different civil society organizations in each of the 19 countries participating in this process.

In this context, the CCO is made up of a coalition of civil society organizations and social actors of the continent, created to follow up on compliance with the agreements adopted by the governments of the hemisphere at the VIII Summit of the Americas held in 2018 in Lima, Peru. The Lima Agreement, "Governance against Corruption", a document resulting from the Summit, provided an opportunity to endorse and ratify previous international commitments on anti-corruption issues.

In this regard, the national report is intended to present a summary of the results and conclusions on the follow-up of the progress and/or compliance in Paraguay with the commitments made at the 2018 Summit, based on the follow-up methodology document for the Lima Agreement<sup>1</sup> and on the information review carried out by 10 Paraguayan civil society organizations. All the information collected during the follow-up is available on the CCO website<sup>2</sup>.

The methodology for monitoring the Lima Agreement allows civil society to assess the progress and/or compliance with the 19 commitments prioritized<sup>3</sup> by the CCO for monitoring in each of the countries participating in this observatory. The follow-up is based on the review of developments at both the policy<sup>4</sup> and practical levels made by national governments over the last two years in respect of the commitments made in the fight against corruption.

At the normative level, current regulations were reviewed, based on 75 guiding questions regarding constitutional, legislative and jurisprudential developments. The analysis of practice consists of the review of concrete measures taken by the government in response to the commitments made. For this purpose, 64 questions were constructed, which were answered through requests for information, interviews, reference to media reports, reports and research on the subject, among others. This information is the basis for evaluating each commitment in terms of effectiveness, efficiency and sustainability<sup>5</sup>.





## Participating Organizations

*Semillas para la Democracia* led the participatory process of CSOs through a creative and collective process, taking into account the health emergency context derived from COVID-19. Social actors were mapped and relevant information on the Lima Agreement was shared with them, while individual virtual sessions were held with each organization, which allowed enriching the country assessment based on the experience and specific knowledge of each group, through interviews, recommendation of bibliographic review of materials prepared by the institutions in relation to the topic, and information exchange for those areas not specifically addressed by them.

Although few organizations have been identified that work specifically on the issue of corruption in Paraguay, this experience shows the interest of CSOs in analyzing the differentiated impact that corruption has on their populations of interest.

Finally, once the final report had been prepared, it was submitted to the participating organizations for its final validation.



**Semillas para la Democracia** is a non-profit civil association whose main objective is to improve the quality of democracy through the promotion of citizen participation, social equity and the responsible exercise of government, as part of several national, regional and international networks such as CFA, REDLAD, Consorcio PASCA, CIVICUS, and the UNCAC Coalition, among others.

As a national coordinator with experience in similar follow-up processes, with convening and leadership capacity, it articulated CSOs and key actors in the fight against corruption to actively participate in the CCO to ensure that the country report would have a multidisciplinary perspective. In addition, *Semillas para la Democracia* is the CFA's focal point in Paraguay.



**Federación de Entidades Vecinalistas del Paraguay** (FEDEM) is an entity that plays a fundamental role in the process of building citizenship in Paraguay,

<sup>1</sup> The methodology is available at: <https://occ-america.com/metodologia/>

<sup>2</sup> Available at: <https://occ-america.com/>

<sup>3</sup> The 19 commitments were prioritized considering the possibility of performing a compared analysis in all CCO participating countries.

<sup>4</sup> The CCO drew up a first report on policy indicators per region. The document is available at: <https://occ-america.com/2021/07/29/primer-informe-del-observatorio-ciudadano-de-corrupcion-revela-avances-y-retos-normativos-para-la-lucha-anticorrupcion-en-la-region/>

<sup>5</sup> The methodological aspects of this monitoring will be presented in further detail later in the report.





developing several projects in the construction of a model for democratic citizen participation in Municipal and National Public Management.

As a member of regional networks such as *Observatorio Nacional de la Democracia Participativa* (OIDP), the social entrepreneur network (ASHOKA) and *Foro Comunitario del Mercosur*, it has participated in the Summits of the Americas, which has allowed it to provide the CCO with an analysis and a perspective based on its experience.

## CODEHUPY

**Coordinadora de Derechos Humanos del Paraguay (CODEHUPY)** is a network comprised of 40 organizations whose common goal is the defense of human rights in different fields. Since 2002, it has been the Paraguayan Chapter of the

Inter-American Platform for Human Rights, Democracy and Development (PIDHDD, by its Spanish initials).

Its role in the CCO, providing an interdisciplinary perspective - due to the diversity of actors that make up the network - was key to achieving a cross-cutting human rights approach in the follow-up. CODEHUPY prepares the annual Paraguay Human Rights Report, a publication that is used as a reference on the human rights situation and was one of the main sources for monitoring the commitments.



TECNOLOGÍA & COMUNIDAD

**Asociación de Tecnología, Educación, Desarrollo, Investigación, Comunicación (TEDIC)** is an NGO that works for the defense and promotion of Human Rights on the Internet through legal, technical and political analyses of Internet regulations in Paraguay. It is a member of multiple networks and alliances such as CIVICUS, Gobierno Abierto, Red LATAM, OAS, and Red Latinoamericana para la Transparencia Legislativa, among others.

Its role in the CCO for the analysis of commitments from an open data perspective, mainly for the Transparency and Public Procurement areas, was fundamental. Several investigations carried out by the organization are the primary sources of the follow-up and report.



**Instituto de Derecho y Economía Ambiental (IDEA)** is a civil society organization that has been studying and promoting environmental law and defending the rights of access to information, citizen participation and justice since 1996, actively influencing public policies on transparency and democratic governance, promoting the rule of environmental law and sustainable development in Paraguay by

empowering citizens to control the government using the law and encouraging critical thinking. The organization's experience in **strategic litigation in favor of access to public information, transparency and disclosure of sworn statements plays a leading role in its participation in the CCO.**





**Centro de Estudios Judiciales (CEJ)** is a non-profit civil organization that aims to influence the quality of democracy, the improvement of the legal system, the reinforcement of the rule of law and the full exercise of human rights. Its role in the CCO for the policy analysis is

based on its experience in institutional work for the quality of justice in Paraguay, legal culture, access to legal services and the protection of rights, as expressed in the Judicial Reform Process at local and Latin American level.



**TIERRAVIVA a los Pueblos Indígenas del Chaco** is a non-governmental non-profit organization that since 1994 works in the promotion and defense of the human rights of Indigenous

Peoples, with an emphasis on territorial restitution through legal and multidisciplinary advice - to traditional and non-traditional organizations and to its members- oriented to comprehensive enforceability, technical defense in criminal and labor proceedings and development of tools for organizational strengthening. His work experience from interculturality enriched the monitoring of commitments incorporating a comprehensive and multidisciplinary perspective.



**Sindicato de Periodistas del Paraguay (SPP)** is an organization of journalists, press and communication workers that defends the rights and interests of its members by handling claims of

violations of human rights and freedom of expression and defending all workers, even if they are not part of the union. The experience in areas such as access to information, freedom of expression and journalistic investigation of acts of corruption were the source of much of the follow-up.



**Decidamos**, with its Campaign for Citizen Expression, is an association of non-governmental, non-profit organizations that carries out campaigns, programs and projects to strengthen democracy as a political, economic, social and cultural process, promoting citizen participation in the management and control of government activities

and decisions, contributing to the development of critical, organized and pluralistic citizens by providing civic education to the population and building a critical awareness in the defense of human rights.

## Context in Paraguay

There is a large and diverse body of anti-corruption legislation; in other words, it is not for lack of rules or penalties that the corruption phenomenon permeates all areas and at all levels.

The National Anticorruption Secretariat (SENAC, by its Spanish initials) is the governing body of the Executive Branch's anticorruption policy, from where several entities such as the





Executive Branch's Institutional Network for Transparency and Anticorruption and the National Team for Integrity and Transparency<sup>6</sup> are articulated. There have been significant institutional efforts embodied in a series of instruments such as the National Integrity Plan; the Manual of Accountability to the Citizen, which is mandatory in Executive Branch institutions, but is not sufficiently disseminated in all institutions, especially in the municipal and regional governments; the Internal Control System - MECIP<sup>7</sup>, the guide for Construction of the Corruption Risk Map; added to a dynamic legal framework largely adapted to international requirements. However, a series of barriers persist, such as the lack of legal security and independence of the Judiciary, which results in high impunity levels; discontinuity of policies and projects with each change of authorities; absence of regulations to manage conflicts of interest, prevalence of prebendalism, patronage and nepotism, lack of efficient control of political financing, and weak development of an ethical culture among the population.

The existence of a centralized agency -such as SENAC- does not automatically ensure the implementation of these guidelines throughout the State. A centralized agency has the virtue of specialization, but it is necessary to articulate this specific knowledge with the distinctive features of each jurisdiction's organizational context.

Access to public information and open government represent fundamental pillars in the fight against corruption as public prevention policies. However, it is necessary to take into account that the existence of laws that protect the right to information and multiple mechanisms that allow its exercise are not enough to ensure it. Making information understandable and accessible to the citizens is a pending task so as to empower civil society as a guarantee of broad access.

On the other hand, although the publication of data without synergy between the competent agencies may fulfill an active transparency role, it is not useful for its intended purpose, which is to effectively make information transparent under the highest standards and make it useful for the public to understand the data and be able to carry out an accessible control over it, since it does not meet the attributes for relevant and high-quality information.

It is important to highlight the efforts made to professionalize administrative careers, not only through public tenders, but also through training plans and constant education on various

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<sup>6</sup> The National Integrity and Transparency Team is a political-institutional platform belonging to the Executive Branch, which interacts with the other government branches with the aim of identifying common goals and establishing minimum standards. It is made up of the National Anticorruption Secretariat (as General Coordinator), the Civil Cabinet of the Presidency of the Republic, the Ministry of Finance, the National Directorate of Public Procurement, the Secretariat for Prevention of Money and Asset Laundering, the Central Bank of Paraguay, the Civil Service Secretariat, the Ministry of Justice, the Ministry of Information and Communication Technologies, and the Technical Secretariat for Planning and Economic and Social Development.

<sup>7</sup> Internal Control Standard Model for Public Institutions in Paraguay: Since its inception, there have been changes to improve the instrument, but to date it is no more than a mere compliance mechanism with the control bodies.





topics related to efficient administration, such as public integrity. However, patronage and nepotism are still deeply rooted in the administration.

Public procurement is the sector that is most vulnerable to acts of corruption, which was made evident in the context of the health crisis resulting from COVID-19, with a large number of irregularities in the bidding processes for the purchase of medical supplies.

In this context, modern open contracting strategies such as sustainable public procurement or the virtual store implemented by the General Directorate of Public Contracting represent a major breakthrough in anti-corruption strategies, in addition to a policy reform process that would allow greater control and modernization of processes.

It is essential to identify the corruption risks from a human rights and gender perspective, understanding that they have a serious impact on vulnerable or discriminated populations such as indigenous communities, LGBTIQ communities, children and adolescents, elderly people, and in particular women among them in various areas such as political participation, differentiated budgets and social programs, human trafficking, violence, and access to services such as justice, health or education.

Limited citizen participation in the fight against corruption is directly related to the lack of socialization of accessible mechanisms for this purpose, focusing efforts on the use of technologies, which although they are a useful tool, they do not have an accessibility approach in terms of interculturality, territoriality, generational diversity and gender. In addition, there is selective criminalization, persecution and harassment of human rights defenders and journalists, as well as other forms of attacks on freedom of expression, assembly and demonstration.

There are still strong links between political financing and money laundering and taxpayers' transactions with the State. Therefore, a more coordinated action by the Secretariat for Prevention of Money Laundering, the Central Bank of Paraguay, the Ministry of Finance, the Superior Court of Electoral Justice, the Public Ministry and the Comptroller General of the Republic is necessary.

It is important to focus human rights and asset recovery policies on repairing the problem of social harm; without this premise, asset recovery becomes a mechanism for the isolated use of asset seizure in criminal cases. On the other hand, the greatest weakness lies in the judicial sphere, where there is a great need to promote a cultural change in the operators of justice in order to give asset investigation the same relevance as the one given to the investigation of criminal responsibility.





The COVID-19 pandemic and the resulting health crisis revealed this institutional weakness in all areas. The extreme precariousness of the health system resulting from public and private corruption, the lack of political will to prioritize the allocation of resources in favor of quality public health, giving priority instead to sectoral and private interests to the detriment of public policies for social protection, which is almost non-existent, revealed a State of privileges, ranging from the highly unequal tax system to the embezzlement of public funds with guaranteed impunity.

## Results for Paraguay

As a result of the VIII Summit of the Americas, a process in which the Citizen Forum of the Americas actively participated, the countries of the region signed the Lima Agreement , entitled "Democratic Governance against Corruption", which established 57 commitments for member states to implement concrete actions to reinforce citizens' trust in institutions and reduce the negative impact of corruption on the effective exercise of human rights and the sustainable development of the populations of the American hemisphere.

For the follow-up, four criteria were taken into account to select the commitments that would be representative for analyzing anti-corruption actions in the countries of the region that could be sustainable over time and could be institutionalized, that include new approaches in anti-corruption efforts, and that include the perspective of vulnerable populations. As a result, 19 commitments were selected, classified into 5 specific topics:

- A. Reinforcement of democratic governance
- B. Transparency, access to information, protection of whistleblowers and human rights, including freedom of expression
- C. Financing of political organizations and election campaigns
- D. Prevention of corruption in public works, public contracting and procurement
- E. International legal cooperation; fight against bribery, international corruption, organized crime and money laundering; and asset recovery.

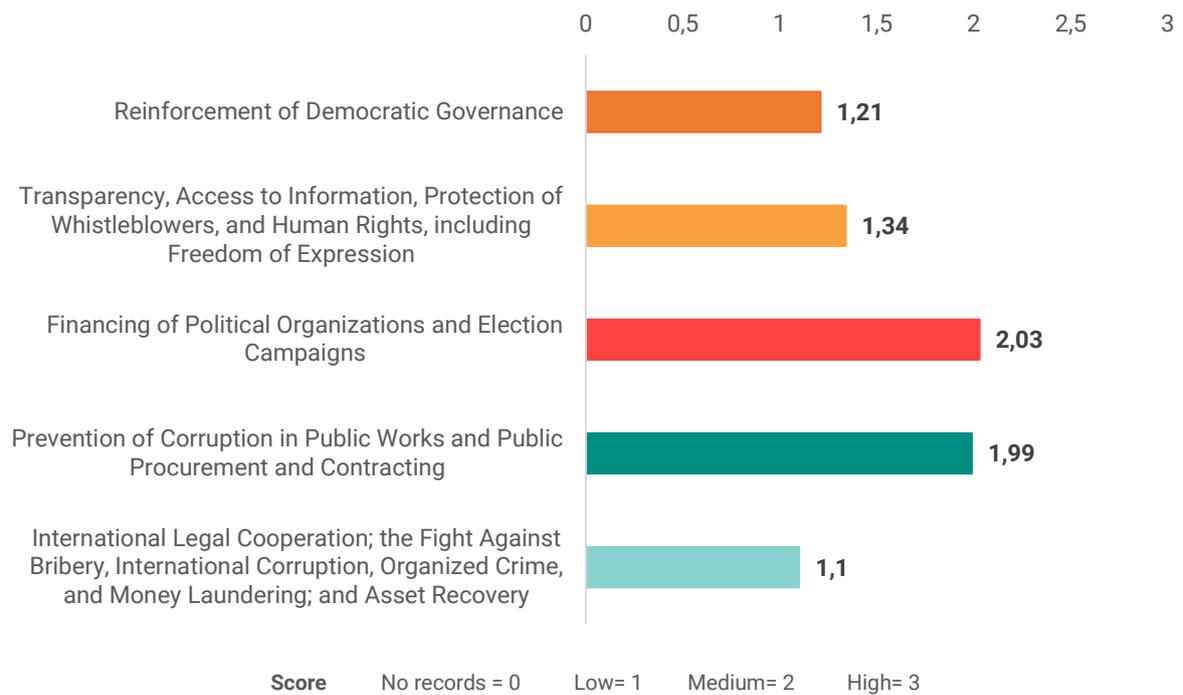
These commitments were analyzed by identifying policy and practical developments, which were rated on a scale of 0 to 3, taking into account the follow-up criteria below:

- **Effectiveness:** establishes the extent to which the actions developed by the government as a result of the Lima Agreement contribute to the fight against corruption in the country,
- **Relevance:** establishes the extent to which the actions developed by the government are timely, convenient and adequate in accordance with the country's economic, institutional and/or social context,
- **Sustainability:** determines the extent to which the actions developed to fulfill the commitment will endure over time.



Graph 1 shows the general results obtained for Paraguay in the five topics into which the commitments are classified:

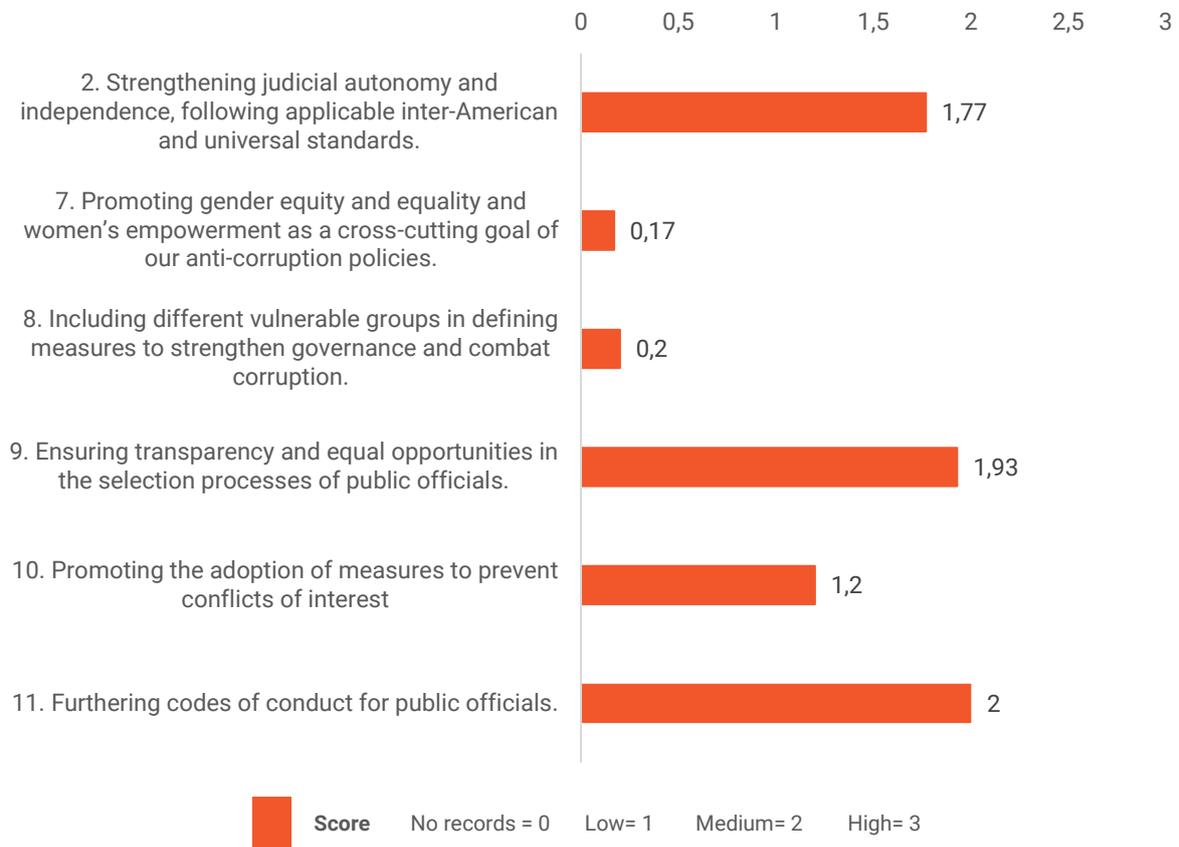
**Graph 1. Results by topic of the Lima Agreement**



Prepared by author based on the information provided by the CSOs participating in the CCO platform.

## 1. Reinforcement of Democratic Governance

Graph 2. Results of Commitments Related to the Reinforcement of Democratic Governance



Prepared by author based on the information provided by the CSOs participating in the CCO platform.

- Democratic governance, a priority within the sustainable development agendas (SDG 2030), includes among its goals the need for effective and transparent institutions. Although the National Integrity, Transparency and Anti-Corruption Plan 2021-2025 and the draft Public Ethics Law stand out as necessary strategies to combat public corruption, the political will of the leaders and the lack of effective independence of the Judiciary are still pending issues to sustain this integrity promotion agenda within a framework of governance improvements.

*"Throughout democratic transition we have seen an action pattern in the Judiciary that points to the instrumentation of justice for the purpose of political persecution, to criminalize political and social dissent, which has been very present in recent times and constitutes one of the central factors that undermine the independence of the Judiciary" (Ayala, O. Codehupy)*





- Although the reforms implemented, such as the professionalization of administrative careers, permanent training, and performance evaluations, among others, in the policy and formal sphere, are aimed at eradicating patronage and the political capitalization of the administrative apparatus, as well as increasing the levels of efficiency, effectiveness and quality of public services, the prevailing corruption generates a high level of distrust among citizens with regard to the political class and the administration. The approval of ethical codes is a valuable tool for the restoration of this lost confidence, but if we focus on the anti-corruption effectiveness of the codes, experience shows that they are useful instruments for those who want to act correctly in dubious situations, but not for those who are willing to violate the law. Their success will depend on the greater or lesser degree of involvement of those to whom they are addressed, on the socialization and adequate adherence such as to reinforce the institutional legitimacy of the public sector.

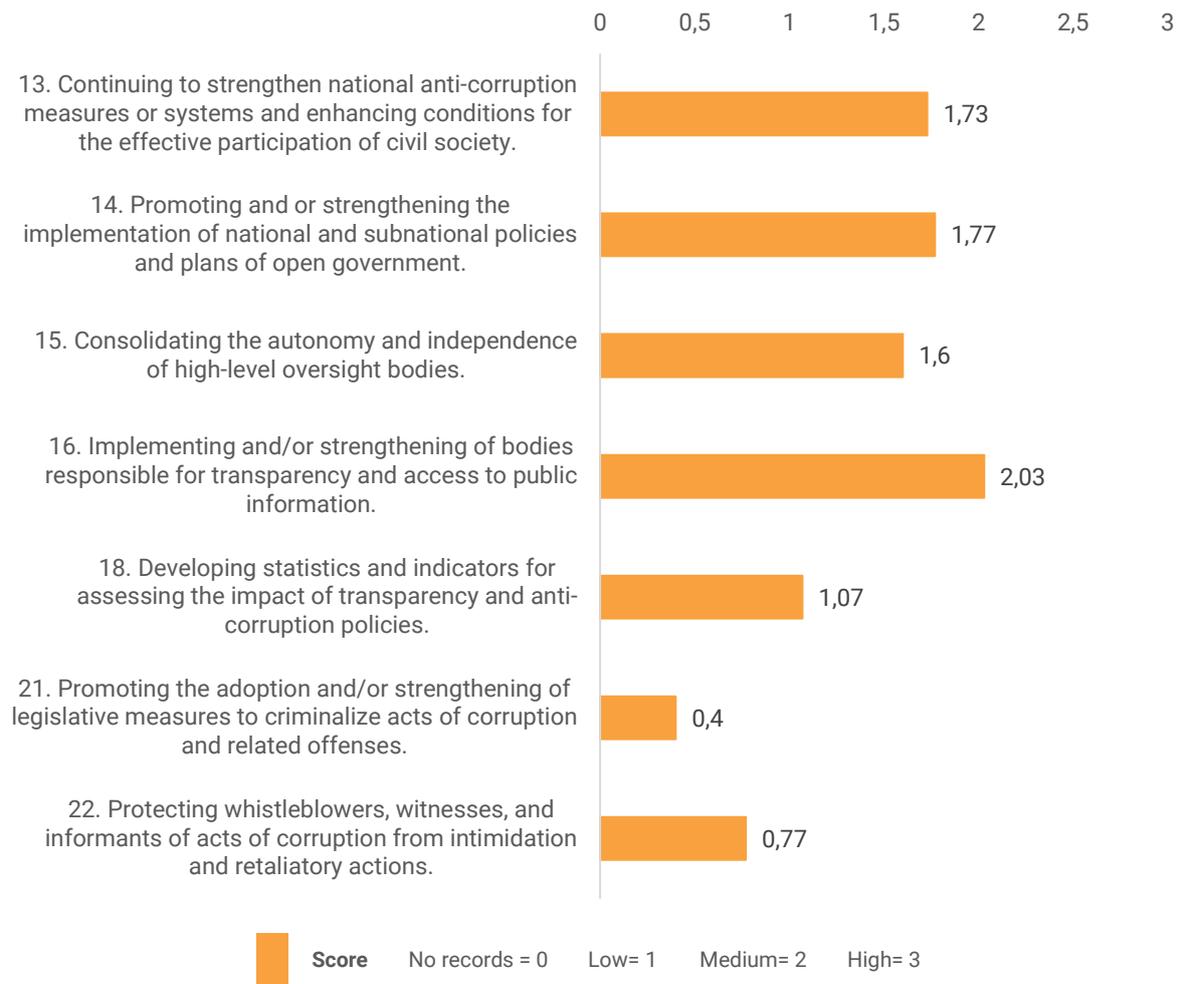
*"This guarantee of impunity is what allows corruption to flourish"  
(Irrazabal, R., Última Hora).*

- Women continue to face problems in accessing positions of institutional and political leadership and public authority. There are few women at high decision-making levels and many are unwilling to challenge the dominant practice. This explains why women's access to positions of authority does not necessarily translate into greater articulation of the interests of women as a whole. Gender equality goes far beyond equal opportunities and requires the participation of women in the transformation processes related to the basic rules and practices of public institutions. If women are not present in the spaces where the bases of a new governance are debated and built, it is not possible to speak of effectiveness, efficiency and sustainability of public agendas with a gender and human rights perspective.



## 2. Transparency, Access to Information, Protection of Whistleblowers and Human Rights, Including Freedom of Expression

**Graph 3. Result of the Commitments Related to Transparency, Access to Information, Protection of Whistleblowers and Human Rights, Including Freedom of Expression.**



Prepared by author based on the information provided by the CSOs participating in the CCO platform.

- The use of ICTs enables greater control of government actions, reducing bureaucracy and discretion. It is undeniable that significant progress has been made in accessing public information. However, there are still technological, cultural, administrative and institutional hurdles to making this access fully effective. The digital gap in terms of the level of internet access in certain areas comes along with some institutions' reluctance to provide information to the public, a practice that is still in place and needs to be eradicated.

The current law leaves on the requesting citizens the responsibility of judicializing the express or tacit denials of access to public information, which, although processed through the constitutional guarantee of legal protection, represents a cost for the requester in terms of time and money. As of the date of preparation of this report, there are at least 99 pending legal cases involving express or tacit denial of access to information.

*"Even though, there has been some progress, Paraguay is far from being a country that can claim to be in line with mandate 13 of this document. At best, the country is showing certain signs of compliance and interest towards it" (Carrillo, E. TEDIC).*

- Regarding citizen participation and its fundamental role in the democracy reinforcement processes, Paraguay has already been the subject of several recommendations, such as those derived from the 2nd cycle of the UPR<sup>8</sup>, where the Government of Paraguay was given 19 recommendations related to civil society space (civic space). In this context, a parallel follow-up conducted by Civicus and the organization *Semillas para la Democracia* reveals that 13 of them have yet to be implemented.

*"There are serious socialization problems. The tools are there: some of them are flawed and others are working very well. But the necessary socialization is lacking, even with journalists. We journalists are not told: Look, there are these new tools. Instead, just by surfing the web, we find out that they exist and we start to use them" (Lezcano, J.C., ABC Color).*

It is necessary to install adequate mechanisms that allow the protection of whistleblowers and witnesses of acts of public corruption. There is a generalized pattern of using the criminal system to persecute and intimidate journalists and activists who investigate and / or report acts of corruption through the criminal offenses of slander, defamation and insult (Penal Code arts. 150 to 156). Likewise, the selective indictment of human rights defenders and the application of administrative sanctioning law for disciplinary purposes, which are systematically used by politicians and even judges and other public figures, is worrying.

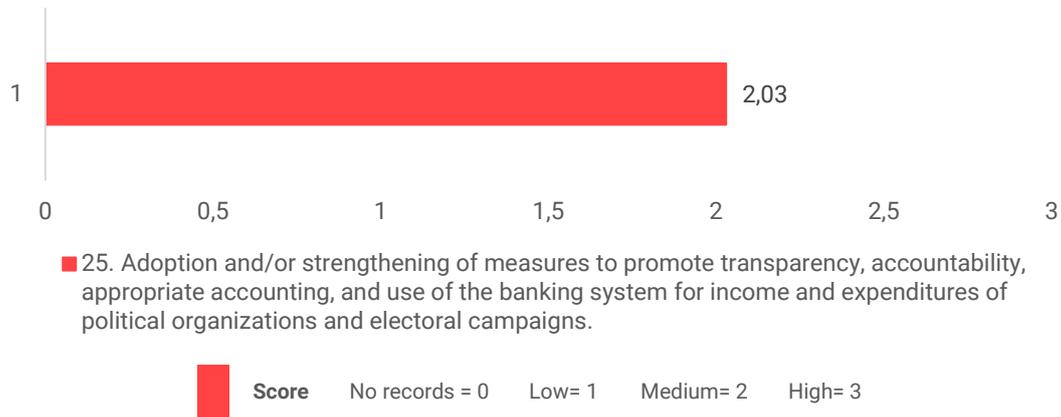
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<sup>8</sup> Universal Periodic Review (UPR).



### 3. Financing of Political Organizations and Election Campaigns

Graph 4. Result of Commitment Related to Financing of Political Organizations and Election Campaigns.

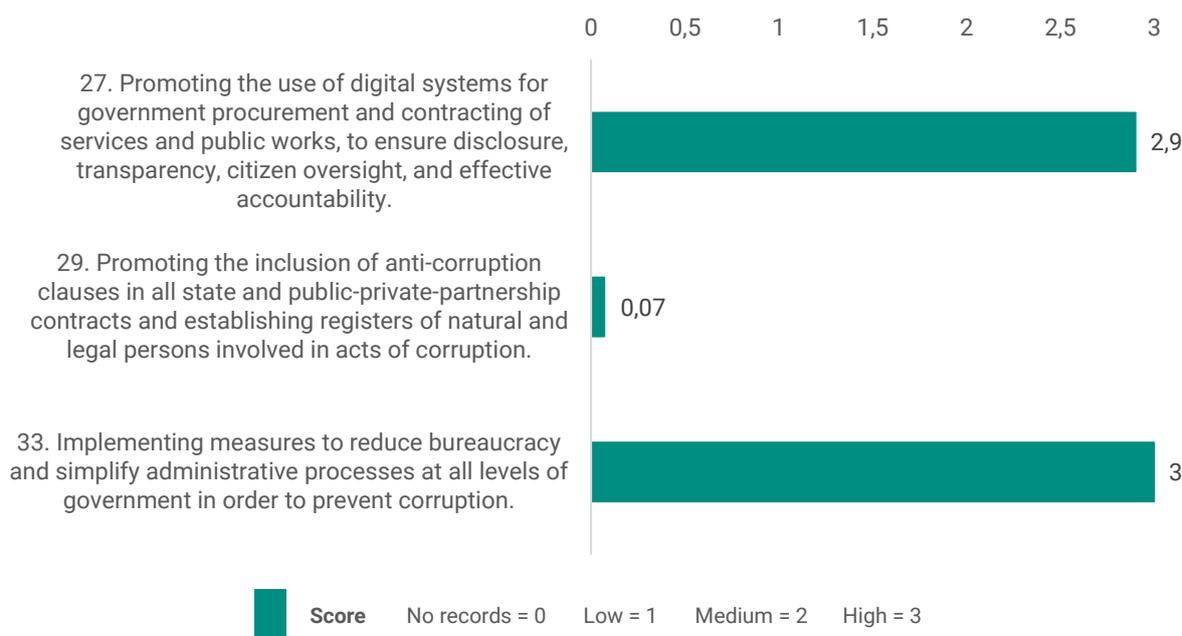


Prepared by author based on the information provided by the CSOs participating in the CCO platform.

- In Paraguay there has been significant progress with the latest amendments to the Political Financing Law. The new legislation represents a challenge in terms of public policies on political financing and shows a path to follow in order to strengthen parties, level the field of competition, reduce asymmetries or prevent the entry of money of illicit origin, mainly in election processes, in which significant inequalities are observed at all levels of election participation, both at the political groups' internal level, as well as in general and municipal elections. The application of sanctions is one of the main challenges of political financing, and its feasibility is related to the State's capacity to enforce the law in a consistent manner.

#### 4. Preventing Corruption in Public Works, Public Contracting and Procurement

Graph 5. Results of Commitments Related to Prevention of Corruption in Public Works, Public Contracting and Procurement



Prepared by author based on the information provided by the CSOs participating in the CCO platform.

- Paraguay has one of the most modern open public contracting systems, with the General Directorate of Public Contracting as one of the pioneering institutions in the implementation of active transparency. Through the Public Procurement Portal, it is possible to find out the details of the bidding processes, government suppliers, etc.

*"With regard to Open Contracting, the Public Procurement Portal reports the adoption of this standard for the publication of its data and its portal displays some data related to government suppliers and the respective amounts awarded in government contracts, which allows citizen control" (Carrillo E. TEDIC).*

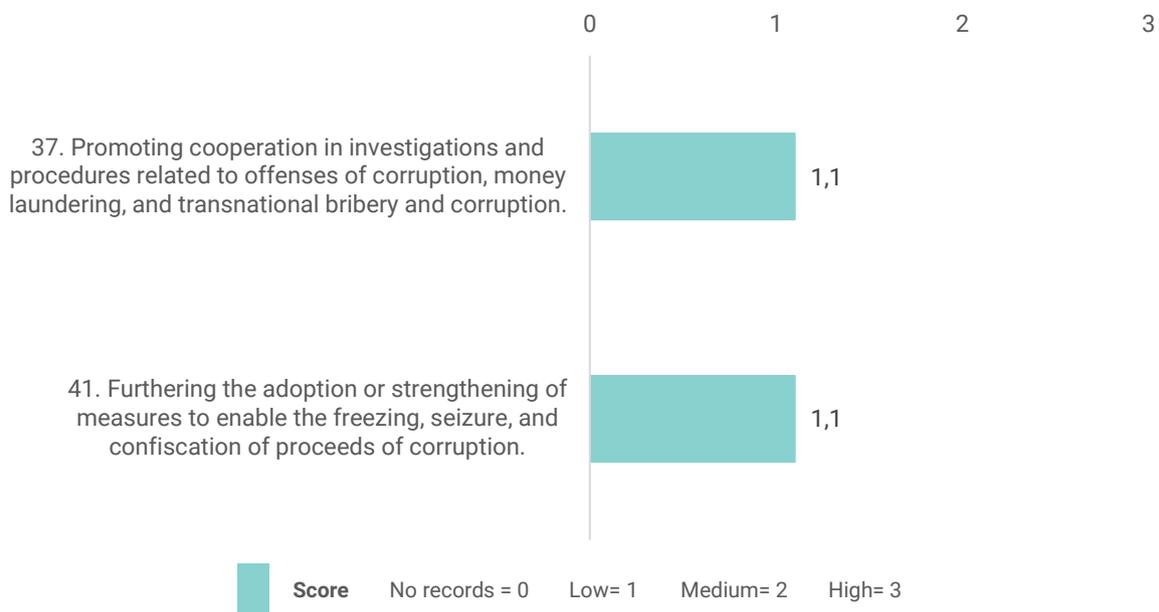
- The National Directorate of Public Contracting has revealed a series of deficiencies within the policy framework, which make the current process susceptible, highlighting the lack of anti-corruption clauses in public contracts. In addition, the little relevance given to the ethical conduct of the actors of the public procurement system is highlighted; the lack of rigor in terms of sanctions for people or companies that fail to comply with their contractual obligations, which results in poor execution of the same.



- In this context, the National Directorate of Public Contracting is leading a process to modify the current law in view of the deficiencies detected. This process is currently in a socialization stage involving different actors from the private sector, academia, the media and civil society.

## 5. International Legal Cooperation; Fight against Bribery, International Corruption, Organized Crime, and Money Laundering; and Asset Recovery

**Graph 6. Outcome of Commitments Related to International Legal Cooperation; Fight against Bribery, International Corruption, Organized Crime, and Money Laundering; and Asset Recovery**



Prepared by author based on the information provided by the CSOs participating in the CCO platform.

- The Supreme Court of Justice has a Directorate for International Legal Assistance and Cooperation but requires a comprehensive approach for its articulation with the other public institutions with competence in the fight against financial crime, which currently operate independently from one another. Barriers to effective collaboration are legal, operational and political, such as specific prohibitions that are applied to prevent one agency from obtaining access to relevant information, complex and lengthy procedures to obtain information from another agency, lack of awareness regarding the availability of information or other cooperation mechanisms, or the scarcity of specialized training, which reduces the effectiveness of existing portals. Political barriers include a lack of adequate support for these agencies to adopt a comprehensive approach.





## Conclusions

The Lima Agreement was a prime opportunity to endorse previous international commitments assumed by the Paraguayan State, as well as to identify scenarios conducive to the discussion, development and implementation of anti-corruption measures in the country.

Although Paraguay mostly complies with the commitments to improve its regulations, the anti-corruption actions taken by the government are not entirely timely, convenient or adequate in accordance with the country's political, economic, institutional and/or social context.

Corruption permeates and causes damage at all levels, but it is clear that it is particularly harmful to the most vulnerable sectors from a social, cultural and economic point of view, which was made evident in this particular moment of health crisis resulting from the COVID-19 pandemic, which the government is unable to deal with effectively due to the high levels of prevailing corruption. The immediate consequence of this is a crisis at the socioeconomic level, resulting in socioeconomic recovery taking many years. Moreover, in the case of Paraguay, due to the high level of corruption, the time for recovery will be longer.

Although progress has been made in the agenda for public transparency, ethics, integrity and accountability, the health crisis has revealed the persistence of limits and hurdles to its effective implementation, such as insufficient or scarce coordination among the various public entities with competence in corruption matters.

Society is becoming increasingly aware that the violation of human rights is not only due to the reduction of civic spaces or the attack on its freedoms. There are other factors that contribute to their deterioration, with corruption as one of the most serious and determining ones. Corruption eats away at public budgets and the ethics of public officials and has become a silent enemy that, at first glance, does not seem to create a violation of rights, but is almost as fatal as violence.

It is crucial to remember that corruption is not a phenomenon exclusive to the public sector. Corruption pervades almost all our societal spheres and that is why the commitment to fight it is imperative.

## Calls to Action

- 1) Consolidate the National Integrity, Transparency and Anti-Corruption Plan (2021 -2025), granting broad participation to civil society, academia, the media and the private sector.
- 2) Strengthen internal control systems in public institutions to prevent corruption.





- 3) Strengthen the tools for transparency and access to public information from a human rights, accessibility and quality perspective.
- 4) Modify legislation establishing the open disclosure -via active transparency- of all sworn declarations on assets and income, in an open data format, including a declaration of interests.
- 5) Approve the draft Law on Integrity and Prevention of Conflicts of Interest in the Performance of Public Functions, expressly regulating the so-called "revolving doors".
- 6) Approve the draft amendment to the Public Contracting Law in order to strengthen transparency and controls.
- 7) Regulate whistleblowing mechanisms and whistleblower protection in accordance with the provisions of the UNCAC and the IACAC, in line with the Lima Agreement.
- 8) Adopt and implement the standards of the Open Government Partnership and the OECD for both open government and administrative simplification.
- 9) Promote mechanisms for active transparency of the candidates' profiles, including their legal background.
- 10) Ensure judicial independence by making sure that justice administration is able to fulfill its function of safeguarding the equality of legal proceedings.
- 11) Adapt asset recovery policies with a human rights and gender perspective aimed at the reparation of social harm.





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## Annexes

### Annex 1: Rating of Lima Agreement in Paraguay

#### Reinforcement of Democratic Governance

**Table 1. Follow-up criteria for commitments related to Reinforcement of Democratic Governance**

Commitment	Relevance	Effectiveness	Sustainability	Country Average
2. Strengthening judicial autonomy and independence following applicable inter-American and universal standards on this matter to promote respect for the Rule of Law and access to justice, as well as to promote and encourage policies of integrity and transparency in the judicial system.	1.80	1.80	1.70	1.77
7. Promoting gender equity and equality and women's empowerment as a cross-cutting goal of our anti-corruption policies, through a task force on women's leadership and empowerment that will actively promote cooperation among inter-American institutions and synergies with other international agencies.	0.20	0.10	0.20	0.17
8. Including different vulnerable groups in defining measures to strengthen governance and combat corruption, recognizing their serious impact on these populations.	0.20	0.20	0.20	0.20
9. Ensuring transparency and equal opportunities in the selection processes of public officials, based on objective criteria, such as merit, equity, and aptitude.	2.00	2.00	1.80	1.93
10. Promoting the adoption of measures to prevent conflicts of interest, as well as the submission of declarations of assets and financial information by public officials, as appropriate.	1.10	0.90	1.60	1.20
11. Furthering codes of conduct for public officials that contain high standards of ethics, probity, integrity and transparency, using as a point of reference the "Guidelines for the Management of Policies for Probity in the Public Administrations of the Americas" and urging the private sector to develop similar codes of conduct.	2.00	2.00	2.00	2.00

Transparency, Access to Information, Protection of Whistleblowers and Human Rights, including Freedom of Expression

Table 2. Follow-up criteria for commitments related to Transparency, Access to Information, Protection of Whistleblowers and Human Rights, including Freedom of Expression

Commitment	Relevance	Effectiveness	Sustainability	Country Average
13. Continuing to strengthen national anti-corruption measures or systems and enhancing conditions for the effective participation of civil society, social organizations, academia, the private sector, citizens, and other social actors in monitoring government performance, including the development of prevention mechanisms, channels for reporting possible acts of corruption and facilitating the work of watchdogs, including other citizen oversight mechanisms, and incentivizing the adoption of digital means of participation.	1.80	1.70	1.70	1.73
14. Promoting and/or strengthening the implementation of national and subnational policies and plans of open government, digital government, open data, fiscal transparency, open budgeting, digital procurement systems, public contracting and a public registry of state suppliers, considering towards that end the participation of civil society and other social actors.	1.80	1.70	1.80	1.77
15. Consolidating the autonomy and independence of high-level oversight bodies.	1.60	1.60	1.60	1.60
16. Implementing and/or strengthening of bodies responsible for transparency and access to public information, based on applicable international best practices.	1.90	2.00	2.20	2.03
18. Developing statistics and indicators in our countries for assessing the impact of transparency and anti-corruption policies and advancing government capacity in this field.	1.20	1.00	1.00	1.07
21. Promoting the adoption and/or strengthening of legislative measures to criminalize acts of corruption and related offenses consistent with the United Nations Convention against Corruption (UNCAC), the United Nations Convention against Transnational Organized Crime, and the Inter-American Convention against Corruption (IACAC).	0.50	0.30	0.40	0.40
22. Protecting whistleblowers, witnesses, and informants of acts of corruption from intimidation and retaliatory actions.	0.80	0.70	0.80	0.77

## Financing of Political Organizations and Election Campaigns

**Table 3. Follow-up criteria for commitments related to Financing of Political Organizations and Election Campaigns**

Commitment	Relevance	Effectiveness	Sustainability	Country Average
25. Encouraging adoption and/or strengthening of measures to promote transparency, accountability, appropriate accounting, and use of the banking system for income and expenditures of political organizations and parties, especially those related to their electoral campaigns, in order to guarantee the licit origin of the contributions and penalizing anyone involved in accepting illicit contributions.	2.10	2.00	2.00	2.03

## Prevention of Corruption in Public Works and Public Procurement and Contracting

**Table 4. Follow-up criteria for commitments related to Prevention of Corruption in Public Works and Public Procurement and Contracting**

Commitment	Relevance	Effectiveness	Sustainability	Country Average
27. Promoting the use of digital systems for government procurement and contracting of services and public works, to ensure disclosure, transparency, citizen oversight, and effective accountability.	2.90	2.90	2.90	2.90
29. Promoting the inclusion of anti-corruption clauses in all state and public-private-partnership contracts and establishing registers of natural and legal persons involved in acts of corruption and money laundering with a view to ensuring that they are not contracted.	0.10	0.10	0.00	0.07
33. Implementing measures to reduce bureaucracy and simplify administrative processes at all levels of government in order to prevent corruption.	3.00	3.00	3.00	3.00



International Legal Cooperation; the Fight Against Bribery, International Corruption, Organized Crime, and Money Laundering; and Asset Recovery

**Table 5. Follow-up criteria for commitments related to International Legal Cooperation; the Fight Against Bribery, International Corruption, Organized Crime, and Money Laundering; and Asset Recovery**

Commitment	Relevance	Effectiveness	Sustainability	Country Average
37. Promoting the broadest possible cooperation among judicial, police, and prosecutorial authorities, financial intelligence units, and administrative authorities in investigations and procedures related to offenses of <b>corruption, money laundering, and transnational bribery</b> and corruption.	1.10	1.10	1.10	1.10
41. <b>Furthering the adoption or strengthening of measures through relevant institutions to enable the freezing, seizure, and confiscation of proceeds of corruption.</b>	1.10	1.00	1.20	1.10

