



ANALYZING TRANSNATIONAL AND STRATEGIC CORRUPTION AND KLEPTOCRACY (TASCK) IN SUB- SAHARAN AFRICA

Phase II Findings Report

Prepared under Contract No.: GS-10F-0033M /7200AA18M00016, Tasking N081

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DRG LEARNING, EVALUATION, AND RESEARCH ACTIVITY II

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AUGUST 2023

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ACRONYMS

ACTF	USAID Anti-Corruption Taskforce
AFR	USAID/Africa Bureau
APC	All Progressives Congress
CAR	Central African Republic
CCFVP	Commission de Contrôle du Financement de la Vie Politique
CENI	Madagascar Independent National Electoral Commission
CSO	Civil Society Organization
DFID	Department for International Development
DRC	Democratic Republic of the Congo
DRG	Democracy, Rights, and Governance
ECOWAS	Economic Community of West African States
EITI	Extractives Industry Transparency Initiative
EMB	Electoral Management Bodies
FCDO	Foreign Commonwealth and Development Office
FOSTER	Facility for Oil Sector Transparency and Reform
GIZ	<i>Gesellschaft für Internationale Zusammenarbeit</i>
HCJ	High Court of Justice
IDEA	International Institute for Democracy and Electoral Assistance
IFES	International Foundation for Electoral Systems
IFF	Illicit Financial Flow
INEC	Independent National Electoral Commission
INL	Bureau of International Narcotics and Law Enforcement Affairs
ITSCI	International Tin Supply Chain Initiative
MEL	Monitoring, Evaluation, and Learning
NEITI	Nigeria Extractive Industries Transparency Initiative
NGO	Non-Governmental Organization
NNPC	Nigerian National Petroleum Corp
NRGI	Natural Resource Governance Institute
OCCRP	Organized Crime and Corruption Reporting Project
OGP	Open Government Partnership
PAC	<i>Pôle Anti-Corruption</i>

PDP	People's Democratic Party
PEA	Political Economy Analysis
PEP	Politically Exposed Persons
PRC	People's Republic of China
RBL	Resource Backed Loan
RINDRA	<i>Renforcement de la gouvernance à Madagascar</i>
SAI	Supreme Audit Institution
SAMIFIN	Madagascar Financial Intelligence Unit
SOE	State Owned Enterprise
TASCK	Transnational and Strategic Corruption, and Kleptocracy
TI	Transparency International
TNRC	Targeting Natural Resource Corruption
UAE	United Arab Emirates
UK	United Kingdom
UNCAC	United Nations Convention Against Corruption
UNODC	United Nations Office on Drugs and Crime
U.S.	United States
USAID	United States Agency for International Development
USD	United States Dollar
USG	United States Government

EXECUTIVE SUMMARY

BACKGROUND

The 2021 United States Strategy on Countering Corruption and the 2022 United States Agency for International Development (USAID) Anti-Corruption Policy confirm anti-corruption as a United States government (USG) priority and reorient the USG approach to tackle forms of corruption with international dimensions more intentionally within programming. Transnational and strategic corruption, and kleptocracy (together “TASCK”) are particularly pervasive and large-scale forms of corruption that are enabled through global linkages.

In sub-Saharan Africa, cases of TASCK have had negative impacts on democratic governance and development. However, there is limited analysis of lessons from these cases and uncertainty on whether development responses sufficiently take account of these issues. This research study seeks to fill these knowledge gaps by analyzing manifestations of TASCK in the region and answering the question: how, if at all, should USAID adapt, expand, and/or enhance its programming in sub-Saharan Africa to address transnational and strategic corruption and/or kleptocracy? The findings are also relevant to other development agencies working on these issues.

This study was divided into two phases. Phase I provided a broad overview of how TASCK manifests in sub-Saharan Africa and the geographies and sectors in which it is most prevalent. Phase I consisted of a literature review of 98 sources, consultative interviews with nine anti-corruption stakeholders, and a virtual co-creation workshop with USAID stakeholders to present preliminary findings and collect input on refining the focus of Phase II.

Based on Phase I research, the study team focused Phase II on examining how the forms of corruption constituting TASCK manifest around elections and political processes as well as the natural resources sector. In consultation with USAID, the team selected Madagascar and Nigeria as case study countries to provide supporting evidence for the analysis. In Phase II, the study team undertook a literature review of approximately 61 additional sources, stakeholder interviews with 56 individuals, two virtual findings validation workshops, and a final findings presentation.

PHASE I FINDINGS

TASCK forms of corruption are prevalent in many geographies where USAID operates in sub-Saharan Africa and are consequently critical issues for the agency to consider as it seeks to meet its development objectives in the region. Pioneering work by investigative journalists and civil society organizations (CSOs) has brought to light cases of TASCK in sub-Saharan Africa. However, data gaps impede our ability to fully understand the scale of the problem.

USAID missions and teams seeking to counter TASCK forms of corruption need a clear analytical framework to capture qualitative manifestations of these issues. While there are differences between geographies, common patterns are discernible with the development of TASCK often unfolding in three

key areas: the formation of law and policy, the implementation of policy, and efforts to disable accountability institutions.¹

International actors often play important roles in these processes. International firms (understood to include private and state-linked firms) can work with political elites to capture policy processes and secure key assets to their mutual advantage. Networks of actors including accountants, banks, company formation agents, consultants, and lawyers (collectively “international enablers”) work with political elites to move wealth outside of the country through intermediary jurisdictions and into assets in developed countries. There is increasing evidence to suggest that foreign states and state-linked actors have used corruption as a means of advancing foreign policy objectives in the region, activities the USG has defined as “strategic corruption.”

These issues are equally relevant to a range of sectors in which USAID operates including natural resources, infrastructure, global health, energy, security/conflict prevention, agriculture/food security, and elections and political processes. The Phase I report maps out common manifestations of these issues across sectors.

PHASE II FINDINGS

The Phase II analysis focused on natural resources as well as elections and political processes. Across sub-Saharan Africa, both sectors are key targets for kleptocratic networks, with political elites often working with international actors to develop control over these sectors. These are sectors where there is extensive programming in the region from which lessons can be drawn and specific entry points developed.

ELECTIONS AND POLITICAL PROCESSES

The report highlights illicit forms of political finance as the key manifestation of TASCK in the elections and political processes sector in sub-Saharan Africa. Although negligible data (e.g., on volume and source of funds) are available, discussions with experts and known cases indicate corrupt capital is an important source of political finance in many countries in the region. The transnational connections are twofold. Funds laundered using the international financial system are recycled into domestic politics, with international banks, auditing firms, lawyers, and consultants sometimes playing an enabling role. International actors (firms, organized crime groups, and, in some instances, state-linked actors) may additionally provide opaque forms of finance. Natural resource rents are a common source of illicit finance in the region.

In addition to political finance, the report highlights, among other issues, procurement of election equipment, surveillance, and use of political consultancies as areas where international actors may have a role in corruption. Experts recognized strategic corruption, the weaponization of corruption by states to pursue foreign policy objectives, as a phenomenon affecting elections and political processes. The Russia-linked Wagner Group is a key proponent. Alongside illicit sources of finance, strategic corruption

¹ Elizabeth Dávid-Barrett, “State capture and development: a conceptual framework.” *Journal of International Relations and Development* (March 2023). <https://link.springer.com/article/10.1057/s41268-023-00290-6>

may involve the spread of disinformation, supply and manipulation of elections technology, and direct intimidation of activists and voters by state-linked groups.

Various issues make elections and political processes in the region vulnerable to these forms of corruption, including lack of data on political finance; the high cost of politics; gaps in political finance regulations; limited or negligible oversight of the regulations; the predominance of cash-based politics; and weak institutional capacity within political parties. Some of these weaknesses provide potential entry points for programming.

The research reviewed elections and political processes programming in the region involving various development agencies to assess the extent to which this takes TASCK into account. This study finds that TASCK tends not to be a direct focus of existing elections programming, where the predominant themes are to ensure elections are held and then to provide support for their administration. Election programming is concentrated around the campaign period whereas TASCK is relevant to the full political cycle. Although specialist organizations are working on corruption and political finance in the region, this is equally an underserved area of programming.² Experts cite several reasons for this, including the high political sensitivity of the issues and perceptions that this is a difficult area within which to have an impact.

The report groups relevant examples of existing programming into five categories based on the USAID Guide to Countering Corruption across Sectors:³

- 1) **Transparency and awareness raising:** Examples of relevant work include CSO publication of campaign expenditure data. Asset and income disclosures for political candidates have also been advocated in some jurisdictions.
- 2) **Social and institutional accountability:** This category encompasses funding for capacity-building at electoral oversight institutions and support to CSOs and journalists conducting advocacy and research activities on these issues. In the former group, it is rare for this support to focus on political finance oversight specifically. Trans-local journalism especially has helped to expose TASCK affecting multiple African countries and has been supported by international development agencies.
- 3) **Prevention:** Voter education and information campaigns are common but do not tend to directly address the forms of corruption constituting TASCK. Capacity-building work with political candidates and parties is another underdeveloped area of programming, likely due to the political challenges in engaging parties.

² These include International IDEA, the International Foundation for Electoral Systems (IFES), Transparency International, and the Westminster Foundation for Democracy.

³ The categorization is based on USAID's Guide to Countering Corruption across Sectors. United States Agency for International Development. "USAID Guide to Countering Corruption Across Sectors." Washington, DC: United States Agency for International Development, 2022. https://www.usaid.gov/sites/default/files/2023-01/USAID_Guide_to_Countering_Corruption_Across_Sectors_0.pdf

- 4) **Detection:** Some development agencies have provided support to Supreme Audit Institutions (SAIs) and equivalent bodies to detect illicit political finance and/or to highlight non-compliance with political finance rules.
- 5) **Response:** Recovery of assets located internationally from politically exposed persons represents a form of response to TASCK which has led to some successes. Donor activities to counter misinformation, disinformation, and malinformation in effect represent a response to a form of strategic corruption, even while programming may not have originally been instigated with this threat in mind.

The report highlights several examples of innovation which merit consideration as part of future programming related to TASCK.

NATURAL RESOURCES

Corruption in the natural resources sector in sub-Saharan Africa is extensively researched and CSOs and journalists have frequently highlighted the transnational dimensions to schemes. The report employs value chain analysis to define areas of the sector where the different forms of corruption constituting TASCK commonly combine.⁴ These are:

- Securing access to natural resources, in particular, using bribery and improper influence over rule-making for allocation of licenses and rights.
- Operations, incorporating transport of illicit goods and finance across borders.
- State revenue collection, including under-reporting of revenues by international firms and improper allocations of commodity sales contracts.
- State revenue management, which may involve direct embezzlement of funds by political elites working with international enablers.
- State-owned enterprises (SOEs) which often sit at the center of corruption schemes and are a key target for capture by political elites.

Strategic corruption adds a new lens for understanding the dynamics around these corruption schemes in certain circumstances. Securing access to natural resources may be a goal of foreign state-linked actors who employ methods such as bribery, provision of illicit political finance, and resource-backed loans premised on corruption. Motivations are not always clear cut, however, and personal financial gain may be as much of a motivation as meeting foreign policy objectives in some cases termed as strategic corruption.

Multiple development agencies and partners have undertaken programming in this sector both directly on corruption issues and through broader work on natural resource governance. This is largely

⁴ The structure is based on the Natural Resource Governance Institute's corruption diagnostic tool: Alexandra Gillies, et al. "Diagnosing Corruption in the Extractive Sector: A Tool for Research and Action." Natural Resource Governance Institute. (August 2021).

organized at the national level although some activities specifically work on transnational dimensions to the problem, notably activities on corruption in the illegal wildlife trade where there has been innovation in working across the international value chain.

Examples of existing programming are organized according to the same five categories based on the USAID Guide to Countering Corruption across Sectors:

- 1) **Transparency and awareness raising:** This has been the predominant form of programming supported by international development agencies in the sector. The Extractives Industry Transparency Initiative (EITI) is the largest and best-known initiative, with similar initiatives underway for other types of natural resources. Recent moves within the EITI to more explicitly target corruption present an opportunity to engage more countries and actors in anti-corruption work.
- 2) **Social and institutional accountability:** Support to CSOs and journalists has similarly been a common form of relevant programming undertaken by development agencies. The development of international networks of journalists is a key development that has brought to light TASCK in the region involving various types of natural resources.
- 3) **Prevention:** Due diligence and traceability initiatives in the mining sector are one of the most developed areas of programming. However, initiatives primarily focus on site-level human rights concerns. There are questions on the extent to which they account for TASCK forms of corruption at an earlier stage in the value chain, such as integrity issues related to how firms obtain concessions.
- 4) **Detection:** Monitoring of financial transactions, auditing, and support for whistleblowers are features of several natural resource programs in the region. Organizations working on the wildlife trade have been the most advanced in terms of using financial intelligence to detect illicit finance. Some of this work has been transnational in scope through purposefully engaging international banks.
- 5) **Response:** In kleptocracies anti-corruption law enforcement activities are often ineffective where political elites are able to control national institutions. As alternatives, follow-the-money approaches led by CSOs are gaining traction in the natural resources sector and explicitly take transnational linkages into account.

Despite these types of initiatives, there are persistent challenges relevant to countering TASCK which many types of existing programs have struggled to address. These notably include:

- Translating increased transparency into accountability for actors implicated in corruption across jurisdictions;
- Finding ways of working with government institutions that do not reinforce corrupt systems; and
- Engaging the full range of enabling actors in private sector work.

KEY CONSIDERATIONS AND POTENTIAL ENTRY POINTS

TASCK presents a distinct challenge for the design of development programs: the issues transcend the geographic area of any one USAID Mission and extend to developed countries where USAID does not have a legal mandate to operate. There are commonly substantive political obstacles to making progress on these issues. The report outlines some key considerations for programming which are relevant to both sectors, namely the need to:

- **Look beyond country-level programming.** The transnational elements of TASCK require the agency to explore different means of bringing about change than single-country programs. Approaches to emphasize include multi-jurisdictional programs within sub-regions; expanded regional collaboration with the United States Treasury and Department of State; and using USAID voice in international fora to promote key themes which could advance efforts to address TASCK (see examples in recommendations below).
- **“Think and work politically”** to find the right routes for engagement on intensely political issues. In kleptocracies, government institutions are unlikely to be reliable partners for anti-corruption work. Working with civil society as well as with the private sector provides alternative routes to support change processes.
- **Apply fit-for-purpose monitoring, evaluation, and learning (MEL)** which adapts to account for the inherent difficulties in demonstrating impact in addressing TASCK.
- **Draw on local expertise**, in particular for political economy analysis and MEL.
- Pay enhanced attention to **“do-no-harm” protections** due to the severe threats presented to civil (and in some cases government) actors working on these themes.
- Ensure strong **coordination with other donors and United States agencies** to profit from the different skill sets and connections needed to tackle these forms of corruption.
- Advocate for **consistency between diplomacy and development assistance** so as not to undermine anti-corruption messaging and work.

The report concludes with a discussion of potential entry points for USAID programming in the two thematic areas. These are noted in **Table I** below with further detail provided in the report.

Table I: Potential Entry Points for Programming

NUMBER	ELECTIONS AND POLITICAL PROCESSES	NATURAL RESOURCES
I	Advocate and support a wholesale shift in attention to political finance in election monitoring and programming.	Significantly expand and sustain support to investigative journalism groups and CSOs working on natural resources corruption, emphasizing the strengthening of international networks.

NUMBER	ELECTIONS AND POLITICAL PROCESSES	NATURAL RESOURCES
2	Significantly expand and sustain support to CSOs and investigative journalist networks monitoring political finance and exposing abuses.	Make contract transparency a priority across engagements in the sector.
3	Launch a regional research program to expand the knowledge base on how to make progress in reducing corruption around elections and political processes.	Ensure corruption is systematically considered in minerals due diligence and certification schemes.
4	Systematically integrate analysis of TASCK into early warning systems for electoral violence.	Establish a dedicated pool of funding to support strategic litigation on natural resource corruption.
5	Push for a sustained drive in programming to address legal framework gaps in political finance.	Replicate successful approaches to engaging banks in the illegal wildlife trade with other forms of natural resource corruption.
6	Expand support to multi-stakeholder initiatives on recovery of corruption proceeds.	Explore and expand ways of engaging additional enabling professions in collective action initiatives.

BACKGROUND

The 2021 United States Strategy on Countering Corruption and the 2022 United States Agency for International Development (USAID) Anti-Corruption Policy⁵ confirm anti-corruption as a U.S. (United States) government (USG) priority and recognize the endemic and globalized nature of corruption. These documents seek to reorient the USG approach to tackle forms of corruption with international dimensions more intentionally within programming. Transnational and strategic corruption, and kleptocracy (together “TASCK”) are particularly pervasive and large-scale forms of corruption that are enabled through global linkages. They exploit gaps in the international financial system and weaken the legitimacy and effectiveness of national governments by allowing corrupt actors to siphon off resources that should be used for the public good. These forms of corruption are the focus of this research and are defined as follows:

- **Transnational corruption:** Corruption that crosses borders, involves global networks, and employs sophisticated schemes to siphon off the wealth of a country from its rightful owners.
- **Strategic corruption:** When a government weaponizes corrupt practices as a tenet of its foreign policy.
- **Kleptocracy:** A government controlled by officials who use political power to appropriate the wealth of their nation. Can include state capture.⁶

In sub-Saharan Africa, investigative reporting has brought to light cases of TASCK and shown their negative impacts on democratic governance and development in the region. However, there is limited analysis which draws together lessons from these cases. Moreover, there is uncertainty on whether development responses sufficiently take account of these issues, or how responses might be adapted to address them. This research study seeks to fill these knowledge gaps by analyzing manifestations of TASCK in sub-Saharan Africa.

PURPOSE

The purpose of this research is three-fold:

1. To provide sub-Saharan Africa-specific insights on opportunities to address transnational and strategic corruption and/or kleptocracy to assist the USAID/Africa Bureau (AFR) and Missions in responding to strategic shifts in USAID’s anti-corruption efforts.
2. To increase USAID’s understanding of how TASCK manifests in sub-Saharan Africa.
3. To explore existing USAID anti-corruption efforts and if/how USAID programming can better address TASCK.

⁵ United States Agency for International Development. 2022. “Anti-Corruption Policy.” Washington, DC: United States Agency for International Development (2022).; United States Agency for International Development. “United States Strategy on Countering Corruption.” Washington, DC: United States Agency for International Development (2021).

⁶ United States Agency for International Development. “United States Strategy on Countering Corruption.”

The overarching Research Question is: **How, if at all, should USAID adapt, expand, and/or enhance its programming in sub-Saharan Africa to address transnational and strategic corruption and/or kleptocracy?**

The study consisted of two phases. Phase I provided a broad understanding of how TASCK manifests in sub-Saharan Africa and the geographies and sectors it is most prevalent.

Specific Research Questions for Phase I:

1. How does TASCK manifest in sub-Saharan Africa?
2. In what priority geographies are TASCK most prevalent?
3. In which sectors are TASCK most prevalent?
4. Within the examined sectors, what are the governance, economic, and/or social impacts of these types of corruption? How do these impacts vary by demographic group?

Phase II of this project focused on the elections and political processes and the natural resources sectors with two country cases, Madagascar and Nigeria, providing supporting evidence.

Specific Research Questions for Phase II:

1. How does transnational corruption manifest within the two selected thematic areas (elections and political processes and natural resources)?
 - a. How does transnational corruption within these areas affect governance, economic, and/or social outcomes?
2. How, if at all, are USAID and other actors addressing transnational corruption within the two thematic areas?
3. What are the key considerations and entry points for how development approaches might be adapted to address these forms of corruption within the two thematic areas?

Key users of this research include USAID/AFR, USAID Anti-Corruption Taskforce (ACTF), USAID Center for Democracy, Human Rights, and Governance (DRG Center), and USAID Missions in sub-Saharan Africa.

METHODOLOGY

This study was divided into two phases. Phase I, conducted from October 2022 to March 2023, provided a broad understanding of how TASCK manifests in sub-Saharan Africa and the geographies and sectors it is most prevalent. Phase I consisted of a literature review of 98 sources, consultative interviews with nine anti-corruption stakeholders, and a virtual workshop with USAID stakeholders to present preliminary findings and collect input on refining the focus of Phase II. The study team prepared a Phase I report detailing the full methodology, key findings, takeaways from the workshop, and the sector and country selection process leading into Phase II. A summary of the Phase I report is provided below (see “Phase I Overview”).

Based on Phase I research, the study team focused Phase II of the study on examining the transnational elements of corruption in sub-Saharan Africa related to two selected sectors: 1) elections and political

processes and 2) natural resources. In consultation with USAID, Madagascar and Nigeria were selected as case study countries to provide supporting evidence for the analysis. These two countries were chosen based on their relevance to the sectors of focus (i.e., locations where TASCK often manifests in election and political processes, as well as natural resources) and the existence of current USAID programming to draw lessons learned. In Phase II, the study team undertook the following data collection methods and processes: literature review, stakeholder interviews, two virtual findings validation workshops, and a final findings presentation.

PHASE II RESEARCH DESIGN

LITERATURE REVIEW

The research team crowdsourced and reviewed approximately 61 additional documents (approximately 15 per global thematic area and 15 country-specific per thematic area), including academic research, reports from think tanks and civil society, and programmatic documents from development actors' anti-corruption programs. The team used data from the literature review to describe and analyze where corruption happens as well as where current programming is focusing on Madagascar and Nigeria, along with the corrupt chain of events and networks.

PHASE II INTERVIEWS

Over a three-week data collection period, the research team conducted 41 interviews, including 30 individual and 11 group interviews, consulting with a total of 57 people (39 males, 18 females). For full interview protocols, please see **Annex B**. Respondents were identified using a purposive and snowball sampling approach. **Table 2** below outlines the respondent type and location for all interviews conducted:

Table 2: Interview Demographics

CATEGORY	INTERVIEWS CONDUCTED
Respondent Type	
Civil Society (non-governmental organizations [NGOs], civil society organizations [CSOs], foundations, media)	20
Development agencies	10
Academia	3
Government	3
Multilateral Organizations	5
Geographic Focus	
Madagascar	14
Nigeria	14
Regional/Other	13
Total	41

ANALYSIS

The team conducted an in-depth, qualitative analysis of the interviews described above. During data collection, the study team took detailed notes and recorded (with consent) all discussions. After data collection, the study team utilized a structured coding approach to conduct content and thematic analysis using Excel software for the identification of emergent themes and contextual factors upon which to draw findings and conclusions and to develop evidence-based recommendations. The study team utilized a Findings, Conclusions, and Recommendations Matrix to triangulate data across data sources and to ensure an evidence-based, triangulated, and systematic analysis process.

FINDINGS VALIDATION WORKSHOP AND FINDINGS PRESENTATION

The study team facilitated two validation workshops on June 22, 2023, with USAID and other relevant USG stakeholders (one workshop for each thematic area), to validate findings from the interviews and literature review or identify areas for further analysis in preparation for the final research study report.

LIMITATIONS

There are several types of limitations associated with this study. First, a limited number of respondents from law enforcement or governmental institutions did not want to participate or hesitated to disclose certain information due to concerns about confidentiality. To address these biases, the team drew from various sources to compile a comprehensive respondent list, conducted a thorough vetting process of recommended respondents with USAID, and took every measure necessary to ensure the anonymity of the data collected.

Second, the literature review resources that could be reviewed and the number of possible interviews that could be held were limited to a narrow data collection timeframe, which put restraints on the ability of the team to fully address the research questions.⁷ The team mitigated this issue by seeking recommended resources from the respondents, drawing on their experience and knowledge of relevant data, and vetting the full literature review resource list with USAID.

Additionally, the study scope was limited by the objective to support program development for USAID Missions across the sub-Saharan Africa region. As such, the research did not examine measures that can be taken in the U.S. domestic context (and in other high-income countries) to combat TASCK. Reforms in these jurisdictions, in particular anti-money laundering controls and law enforcement activities, are acknowledged as critical interdependencies for efforts to address TASCK. Other research is available on the domestic vulnerabilities in high-income countries which contribute to TASCK. This is not the focus here although ways of strengthening links between country and regional programming in sub-Saharan Africa and measures in high-income countries are considered.

Finally, when conducting research related to TASCK and natural resources management, the study team considered a range of natural resources relevant to TASCK but had a particular focus on mining,

⁷ The approval to move forward with Phase II was received at the end of March 2023, and the confirmation to include Madagascar as a country case was delayed until May 10th. Therefore, the study team faced a limited timeline to complete data collection and deliverables before the contract mechanism ends in mid-August 2023. This limited the data collection period to mid-May through mid-June, with no room for delays.

forestry, and wildlife trade; these are resources identified as priorities in the USAID Environmental and Natural Resource Management Framework.⁸

PHASE I OVERVIEW

The following is a brief summary of the Phase I research. The full research report can be provided on request subject to the correct authorizations being obtained.

ANALYTICAL FRAMEWORK

TASCK are highly prevalent forms of corruption in sub-Saharan Africa which have significant adverse development implications. These are far from new phenomena, there are well-known cases of transnational corruption dating from the 1970s and 1980s, however, they are issues that have worsened as the region has become more integrated into the global economy.⁹ The component elements of TASCK share some common characteristics:

- The perpetrators are typically business and/or political elites, a characteristic differentiating these forms of corruption from “administrative corruption;”
- These are corrupt schemes that transcend national borders;
- They are systemic issues where corruption is not an aberration but critical to how the system functions;¹⁰
- The economic, political, and social harms are substantial and prevent developmental objectives from being realized.

How these forms of corruption manifest on the ground in sub-Saharan Africa varies according to political economy conditions, although common patterns and processes are discernible. **Table 3** provides a framework for exploring the manifestation of TASCK in the region. This is an analytical framework of state capture processes developed by Dávid-Barrett where we have added examples of the roles of international actors relevant to the regional context.¹¹

⁸ United States Agency for International Development. “Environmental and Natural Resource Management Framework.” <https://www.usaid.gov/sites/default/files/2022-12/2021-USAID-ENRM-Framework-Summary.pdf>

⁹ A prominent example is the Elf Aquitaine scandal: David Ignatius, “True Crime: The Scent of French Scandal,” Legal Affairs, accessed March 1, 2023, https://www.legalaffairs.org/issues/May-June-2002/story_ignatius_mayjun2002.html.

¹⁰ David Jackson, “Building Anti-Corruption Resilience to Combat Entrenched Corruption Systems,” U4 Issue 2022:17 (2022), <https://www.u4.no/publications/building-anti-corruption-resilience-to-combat-entrenched-corruption-systems.pdf>.

¹¹ Elizabeth Dávid-Barrett, “State capture and development: a conceptual framework.” minor additions made to the original framework to account for the varying roles of international actors in Africa.

Table 3: Manifestations of TASCK in Sub-Saharan Africa (using Dávid-Barrett's state capture analytical framework)

PILLAR OF CAPTURE AND OBJECTIVE	EXAMPLES OF MECHANISMS AVAILABLE TO CAPTOR ELITES	EXAMPLE ROLES OF INTERNATIONAL ACTORS
<p>Formation of constitution/law/policy</p> <p><i>Secure control over the means of violence and shape the rules of the game as they apply to political and key economic sectors.</i></p>	<ul style="list-style-type: none"> • Ensure political control over military, police, and security services. • Shape laws governing state-owned enterprises in key economic sectors – natural resources, banking and finance, utilities – in ways that retain extensive political control. • Set rules of privatization and public procurement to ensure high discretion at the implementation stage. • Shape campaign finance laws to allow anonymous donations. • Limit or remove legal protections for whistleblowers to discourage critical voices. 	<ul style="list-style-type: none"> • Applying improper influence to shape laws to their advantage. • Military and security assistance to regimes. • Covert political campaign contributions.
<p>Implementation of policy by government bodies/civil service</p> <p><i>Influence administrative procedures to benefit the captor network and disadvantage opponents.</i></p>	<ul style="list-style-type: none"> • Appoint allies to key decision-making roles in state-owned enterprises, the civil service, and regulatory bodies. • Influence the implementation of the privatization process to allow allies to purchase key state assets at low prices or with government-backed finance. • Influence public procurement by state-owned enterprises and public-sector agencies to allocate contracts to favored allies. 	<ul style="list-style-type: none"> • Partnerships with political elites allocated contracts. • Advisory services to corrupted state-owned enterprises and government agencies. • Facilitating flows of corrupt capital outside of the country. • Managing and investing corruptly acquired wealth.
<p>Accountability institutions, e.g., SAIs, civil society, the media</p> <p><i>Disable and undermine institutions, organizations, and individuals that reveal corruption or seek to hold power to account.</i></p>	<ul style="list-style-type: none"> • Reform judicial appointments to allow the replacement of independent judges with political allies. • Replace key law enforcement leaders and prosecutors with allies. • Reduce the budget of Supreme Audit Institutions (SAIs), appoint allies to senior leadership, and repress reports. • Intimidate civil society activists, journalists, whistleblowers, and academics who criticize the governments. 	<ul style="list-style-type: none"> • Maintaining political and economic relations while turning a blind eye to regime abuses. • Supporting lawsuits against regime critics. • Reputational management services for elites.

The Phase I report provides illustrations of manifestations of TASCK in countries across the sub-Saharan Africa region.

STRATEGIC CORRUPTION

Strategic corruption, “when a government weaponizes corrupt practices as a tenet of its foreign policy,” is a new term. Our Phase I consultations demonstrated it is not one in widespread use among development practitioners and civil society activists. Some interviewees were uncomfortable with the selective use of the term as a means of critiquing Chinese and Russian foreign policy. Conceptual precision is needed in applying the term. It is important to understand the roles of the different actors

connected to strategic corruption and their motivations. For example, while state-owned companies may provide a vehicle for strategic corruption, in other circumstances it is necessary to distinguish between corruption sanctioned to meet state objectives from corruption for personal gain. Sometimes the motivations of actors can become blurred as these forms of corruption unfold.

Key issues to ascertain in applying the term strategic corruption are the objectives of the deals, the motivations of the actors involved, and the centrality of corruption to these processes. The term is particularly valuable for analyzing the activities of the Russian state-linked Wagner Group in several countries in the region including the Central African Republic (CAR), Madagascar, Mali, Mozambique, and Sudan.¹² The Group has used corruption as a means of advancing Russian state foreign policy objectives, namely securing diplomatic support on the international stage as well as gaining access to natural resources. However, in many of these cases private profiteering features as a parallel motivation, illustrating the conceptual complexities in using this term.

SECTORAL OVERVIEW

TASCK are problematic in many sectors where USAID operates, including natural resources, infrastructure, global health, energy, security/conflict prevention, agriculture/food security, and elections and political processes. The Phase I report provided a high-level overview of manifestations of TASCK in several sectors, outlined in **Table 4** below:

Table 4: Sectoral Overview of TASCK Manifestations

SECTOR	EXAMPLES OF ISSUES	EXAMPLES OF IMPACTED GEOGRAPHIES	INTERNATIONAL ACTORS IMPLICATED
Environment/ Extractives	Looting of natural resources (e.g., minerals, ores, wildlife, timber) from fragile and conflict-affected settings; exchanging access to minerals for influence over state economic and foreign policy; bribery in licensing awards; embezzlement of state revenues from natural resources.	Angola, CAR, Democratic Republic of the Congo (DRC), Equatorial Guinea, Madagascar, Mali, Mozambique, Nigeria, Republic of Congo, South Sudan	International extractives firms; commodity trading firms; state-owned firms implementing foreign policy objectives; agents and middlemen; organized crime groups; enabling actors (accountants, banks, company formation agent's lawyers).
Security/ Conflict Prevention	Bribery and kickbacks on arms sales; looting of natural resources (e.g., minerals, ores, wildlife, timber) from fragile and conflict-affected settings; capture of state institutions by military actors; military commercial activity in fragile and conflict-affected settings.	CAR, Chad, DRC, Mali, Niger, Nigeria, Somalia, South Africa, South Sudan, Sudan	Private military and security companies, including those linked to foreign states; agents and middlemen; international arms firms; organized crime groups; enabling actors.

¹² For an overview see, Julia Stanyard, et al. *The Grey Zone: Russia's Military, Mercenary and Criminal Engagement in Africa*. Geneva: Global Initiative Against Transnational Organized Crime. (2023)

SECTOR	EXAMPLES OF ISSUES	EXAMPLES OF IMPACTED GEOGRAPHIES	INTERNATIONAL ACTORS IMPLICATED
Infrastructure	Bribery and conflicts of interest in public procurement processes; embezzlement of funds from infrastructure projects; allocation of contracts to politically connected firms; ‘white elephant’ projects used for patronage purposes.	Angola, Ghana, Kenya, Nigeria, Senegal, Zambia	International construction firms; state-owned firms implementing foreign policy objectives; agents and middlemen enabling actors.
Global Health	Policy and regulatory capture through bribery/lobbying/improper influence; ¹³ circulation of substandard and falsified medical products ¹⁴	Ethiopia, Ghana, Madagascar, Mali, Niger, Nigeria, Uganda, South Africa	International pharmaceutical manufacturers and distributors; organized crime groups; enabling actors.
Energy	Bribery and conflicts of interest in public procurement processes; policy and regulatory capture through bribery/lobbying/improper influence; improper influence to secure favorable power purchasing agreements; nepotism and embezzlement in state-owned companies.	Nigeria, South Africa	International energy firms; consulting firms; enabling actors.
Elections	Opaque foreign finance for political parties, individual politicians, or government officials; electoral interference and disinformation campaigns coordinated with corrupted state actors.	CAR, Madagascar, Mozambique, Zimbabwe	Firms with international/regional linkages; foreign states, diaspora networks, organized crime groups; enabling actors.
Agriculture/ Food Security	Bribery/improper influence for large-scale land acquisitions.	Ethiopia, Ghana, Mozambique, Tanzania, Zambia	Foreign investors including state-owned firms interested in commercial farming, enabling actors.

Following this research, the research team in consultation with USAID chose elections and political processes and natural resources as sectors for more detailed analysis. These are both critical arenas where TASCK plays out in countries across the region. They are also sectors where there is extensive existing development programming which allows us to assess the extent to which these activities are adequately addressing TASCK.

¹³ Jillian Kohler et al., “Corruption in the Pharmaceutical sector. Diagnosing the Challenges

¹⁴ World Health Organization, “WHO Global Surveillance and Monitoring System”, January 2017, <https://apps.who.int/iris/bitstream/handle/10665/326708/9789241513425-eng.pdf?ua=1>

FINDINGS: ELECTIONS AND POLITICAL PROCESSES

The following section summarizes the key findings on the elections and political processes sector that emerged from the desk review and consultative interviews.

RESEARCH QUESTION 1: HOW DOES TASCK MANIFEST WITHIN THE ELECTIONS AND POLITICAL PROCESSES SECTOR IN THE REGION?

Although multi-party elections in sub-Saharan Africa are the norm today, free and fair elections and peaceful transfers of power remain uncommon. According to 2023 data from V-Dem, 68 percent of people in the region reside in electoral autocracies.¹⁵ Corruption in elections and political processes is a widespread problem for all political regime types. Commonly prevalent forms of corruption include vote-buying, clientelist practices, abuse of state resources by government actors, bribery of election officials, and other forms of electoral fraud.¹⁶ This research study focused on forms of electoral corruption that are linked to the development of kleptocracies in sub-Saharan Africa and may include transnational elements.

Based on the compiled findings from primary and secondary data, **Table 5** below outlines the most significant manifestations of TASCK related to elections and political processes in the region. These types of corruption are organized according to the pre-electoral, electoral, and post-electoral phases of the electoral cycle covered by the USAID Electoral Assessment Framework.¹⁷

Table 5: Manifestations of Transnational Corruption in the Election Cycle in Sub-Saharan Africa

PRE-ELECTORAL PERIOD	ELECTORAL PERIOD	POST-ELECTION PERIOD
<ul style="list-style-type: none"> Poor implementation of frameworks in place to favor foreign business entities: e.g., Nigeria’s Electoral Amendment Bill of 2022. International financial networks channel funds into campaigns. Corruption in procurement tenders for equipment. 	<ul style="list-style-type: none"> Vulnerability of vote collection, vote rigging with illicit funds from abroad. Electoral violence and voter intimidation. Disinformation campaigns. Differences across contexts in what is considered corruption. 	<ul style="list-style-type: none"> Corruption in courts impedes fair hearings on disputes. Favors awarded to international actors as a quid pro quo for elections assistance (licenses, tax exemptions, subsidies).
KEY INTERNATIONAL ENABLERS		
<ul style="list-style-type: none"> Formal and informal banking institutions. 	<ul style="list-style-type: none"> Providers of opaque electoral verification software and surveillance. 	<ul style="list-style-type: none"> Lawyers and political consultants. Security contractors.

¹⁵ V-Dem. “Democracy Report 2023 Defiance in the Face of Autocratization,” (2023) https://www.v-dem.net/documents/29/V-dem_democracyreport2023_lowres.pdf

¹⁶ Nic Cheeseman and Brian Klaas. *How to rig an election*. New Haven: Yale University Press, (2019).; Nicasius Achu Check, Tsholofelo Madise, Nkululeko Majosi, and Yukihiko Hamada.. *The Integrity of Political Finance Systems in Africa: Tackling Political Corruption*. International IDEA Policy Paper No. 20 Stockholm: International IDEA (2019); Amundsen, Inge, Emmanuel Oladipo Ojo, and Vaclav Prusa. “Congenitally Conjoined and Inseparable: Politics and Corruption in Nigeria.” In *Political Corruption in Africa: Extraction and Power Preservation*. Cheltenham, UK: Edward Elgar Publishing, (2019.)

¹⁷ United States Agency for International Development. “Electoral Assessment Framework A Tool to Assess Needs, Define Objectives, and Identify Program Options.” Washington, DC: United States Agency for International Development (2021)

PRE-ELECTORAL PERIOD

PARTY AND CANDIDATE PRIMARIES

Funding for political party primaries and individual political candidates poses one of the single-most important corruption vulnerabilities in the electoral cycle. In the pre-election period, illicit finance occurs during an election campaign as well as during the candidate nomination. Lack of transparency regarding sources of funding constitutes one of the main corruption entry points in elections. Available surveys indicate that most Africans believe that political parties and parliamentarians are among the most corrupt actors in a country.¹⁸ Low trust is a symptom of the commercialization of the political contest, which creates the necessity of raising ever higher amounts of funds, including potentially illicit sources of finance. Governmental oversight and development actors nonetheless often overlook candidate financing arrangements. One expert on political finance in the region explained:

“There is a logic in focusing more on candidate finance because political finance in Africa tends to be very heavily candidate-focused. We should focus more on nomination campaigning as winning a nomination in a safe seat is particularly important. I’ve talked to many politicians in various African countries who say they spend more money on getting nominated than running for election.”

Research published by the Westminster Foundation provides evidence of the increasing cost of politics drawing on data from the Gambia, Mauritius, Uganda, and Zambia, among other countries in the region.¹⁹ Our two case study countries illustrate the dynamics at play. In Nigeria, as described by respondents, all major political parties and most political candidates run a pervasively corrupt political primary system with assets of unexplained origin laundered into the country from foreign jurisdictions. Madagascar has a highly fragmented political system in which wealthy individuals often provide their own sources of finance and where requirements for disclosure lack enforcement.

The use of offshore companies and international financial infrastructure to conceal money flows into political parties and individual candidates’ agendas is elementary for accumulating a sufficient “war chest” throughout the electoral cycle. There are well-known case examples from across the region which required international connections such as the Anglo Leasing and Goldenberg scandals in Kenya and political fundraising by the Kabila administration in the DRC.²⁰ Illicit finance typically originates in African

¹⁸ “Global Corruption Barometer.” Transparency International. Accessed April 20, 2023, <https://www.transparency.org/en/gcb>

¹⁹ “Cost of Politics” Westminster Foundation for Democracy. Accessed April 20, 2023, <https://www.wfd.org/taxonomy/term/71>

²⁰ “State Capture: On Kenya’s Inability to Fight Corruption.” Heinrich Boll Foundation. Accessed April 2023. [state_capture_perspective.pdf \(boell.org\)](#); Peter Jones. “Secretive mining deals risk financing Congo elections again, Global Witness warns.” The Global Witness (2016.); The Kenya African National Union (KANU) ruled for nearly 40 years after Kenya’s independence from British colonial rule in 1963 until its electoral loss in 2002. The Anglo Leasing and Goldenberg scandals revealed how state capture of key ministries enabled the diversion of large state assets from security budgets for political campaigning and other political goals to finance pre-electoral expenditures and remain in power. Crucially, the role of international enablers is exemplified. A private company Anglo Leasing based in Liverpool, UK was used to channel funds out of Kenya through credits meant to finance security-related infrastructure. The Goldenberg scheme defrauded the Kenyan state of between USD 600 million and USD 1.5 billion in subsidies to provide foreign exchange gains through the export of non-traditional commodities.

jurisdictions, is captured by kleptocratic, international networks through offshore entities, and is re-laundered back into the African political cycle with donations of unexplained wealth and origin.

CASE STUDY: MANIFESTATIONS OF TASCK IN NIGERIAN ELECTIONS

In a high-profile case from Nigeria, Mr. Abubakar Atiku Bagudu, the current state governor and a prominent politician, was a known associate of former Nigerian dictator Sani Abacha. Court documents in United Kingdom (UK) and US revealed that Mr. Bagudu was “the gas that powered Mr. Abacha’s extensive money laundering operations,” yet he was cleared to contest in three different election circles as a senator and two as governor. He won all three elections.

The Pandora Papers and other financial leaks and court documents revealed some details regarding how the kleptocratic network with Bagudu at the center devised multiple schemes to channel billions of dollars embezzled under the Sani Abacha regime out of Nigeria and back. In one case, Nigeria was defrauded of more than 282 million U.S. dollars by causing the government to repurchase Nigeria’s own debt from one of their companies for more than double what Nigeria would have paid to repurchase the debt in the open market.

¹ Taiwo-Hassan Adebayo. “Pandora Papers: How Governor Bagudu amassed dirty billions and how he is hiding it.” *International Centre for Investigative Journalism*, October 5, 2021. <https://www.icirnigeria.org/pandora-papers-how-governor-bagudu-amassed-dirty-billions-and-how-he-is-hiding-it/>; It has never been fully explained how complicated structures of secrecy to hide stolen money function. The role of the international enablers including prestigious British law firms, Western banking institutions, and others has not been fully clear. It is equally unclear how Mr. Bagudu funded expensive political campaigns in Nigeria upon his return and how he accessed hidden wealth in foreign jurisdictions to fund his political activities in Nigeria despite numerous court proceedings in the United States and other jurisdictions.

PROCUREMENT OF ELECTIONS EQUIPMENT

The cost of administering elections is high and requires significant public procurement in advance of polling day. Three respondents highlighted this as an area of risk with transnational dimensions. Risks are accentuated as procurement is often overseen by Electoral Management Bodies (EMB) which in many cases are politically captured and have weak financial controls. One respondent noted that EMBs in the region generally procure more from international firms for the acquisition of election technology equipment. As an example of the types of issues which can occur, the Kenyan government’s procurement of the Kenyan Integrated Electoral Management System kits in 2017 was widely criticized for taking place without any transparent competitive process.²¹ In another example, a Belgian company was sued for electoral fraud in relation to the procurement of biometric voter registration kits for the 2011 election in the DRC.²²

SUBVERSION OF OPPOSITION

Domestically embezzled assets and laundered illicit funds from abroad can be used in hiring violent mob and criminal elements to intimidate opposition and voters before and during elections. Violent youth

²¹ “Kenya 2017 General and Presidential Elections.” The Carter Center Elections Report (2018). p.21 [kenya-2017-final-election-report.pdf \(cartercenter.org\)](https://www.cartercenter.org/reports/kenya-2017-final-election-report.pdf); <https://www.justice.gov/opa/pr/us-repatriates-over-3117-million-assets-nigerian-people-were-stolen-former-nigerian-dictator>

²² Nic Cheeseman, Gabrielle Lynch, and Justin Willis (2018) Digital dilemmas: the unintended consequences of election technology, [Digital dilemmas: the unintended consequences of election technology \(tandfonline.com\)](https://www.tandfonline.com)

known as “political thugs” have been instrumentalized by politicians and political parties for decades to influence electoral outcomes.²³ External forces are known to organize violent mobs in the pre-electoral period and during elections in sub-Saharan Africa (see the “Strategic Corruption” section below).

ELECTORAL PERIOD

ILLICIT FINANCE EMPLOYED FOR VOTE BUYING

Many of the experts consulted as well as a large body of literature suggest that vote-buying accounts for the largest aggregated volume of corrupt transactions during an election cycle. Data on the volumes and origins of finance employed for vote-buying is severely lacking for the region. However, experts believe that international sources of capital (for example, funds laundered into developed countries as part of transnational corruption schemes) provide an important route for funds alongside domestic sources.²⁴ Flows of capital from international holdings are supported by bankers, lawyers, and political consultants, although evidence on specific connections to vote buying practices is lacking.

According to respondents, vote-buying remains largely cash-based. Where TASCK is present, countries often experience a large influx of foreign currencies from abroad before elections, which is facilitated by ineffective cross-border declaration systems to seize both inbound and outbound cash as well as bearer negotiable instruments, as repeatedly stressed by the Financial Action Task Force.²⁵ In the Nigeria case, both the experts interviewed and financial intelligence data confirm that moving cash in and out (and within) Nigeria²⁶ is straightforward for Politically Exposed Persons (PEPs).²⁷ Central Banks and financial regulatory authorities that oversee and enforce banking laws and regulations are ineffective and lack operational independence and technical competency to monitor and report PEPs’ activities.

VOTE BUYING IN SUB-SAHARAN AFRICA

In *How to Rig Elections*, Cheeseman and Klaas note that over two-thirds of elections held in sub-Saharan Africa from 2012—2016 witnessed substantial vote buying.¹ According to the International Institute for Democracy and Electoral Assistance (International IDEA), 86 percent of African countries have explicit laws banning vote buying but the practice persists in the sub-Saharan region.²

¹Nic Cheeseman and Brian Klaas. *How to Rig an Election*.

² International IDEA, “Political Finance Database,” <https://www.idea.int/data-tools/data/political-finance-database>, accessed April 20, 2023

²³ “Nigeria Election Violence Tracker” Armed Conflict Location & Event Data project. Accessed April 2023. <https://acleddata.com/>

²⁴Cecilia Macaulay. “Chinyere Igwe: Nigerian politician arrested with \$500,000 on election eve.” *BBC*. 24 February 2023. <https://www.bbc.com/news/world-africa-64756612>

²⁵. “Intensifying the fight against corruption and money laundering in Africa.” United Nations (January 2022). [intensifying_the_fight_against_corruption_and_money_laundering_0.pdf](#)

²⁶ Michael J Kavanagh and William Clowes. “China Cash Flowed Through Congo Bank to Former President’s Cronies.” *Bloomberg*, 28 November 2021. [Africa’s Biggest Data Leak Reveals China Money Role in Kabila’s Congo Looting - Bloomberg](#)

²⁷ A PEP is commonly defined as: “an individual entrusted with a prominent public function.” “Politically exposed persons.” *Council of Europe*. <https://www.coe.int/en/web/moneyval/implementation/politically-exposed-persons>

POLITICAL CONSULTANCIES

There is a growing trend for political candidates and parties to hire international and national consultancy firms to support issues such as digital campaigning, candidate research, and public relations. However, one respondent noted that much of this work does not become public knowledge. Some firms blend legitimate political advisory and subversive political interference in election processes. A case in point is the UK-based Cambridge Analytica and its involvement in the Nigerian 2015 presidential elections. One respondent described how the company provided complex services for the re-election of President Goodluck Jonathan, which included advocacy campaigns, strategic political consultancies, and covert operations against the opposition. African observers noted that “the door has been left open to ongoing foreign involvement in future elections, given that Cambridge Analytica used African elections as a testing ground for campaign tactics it later exported into more lucrative markets.”²⁸ Similar strategies have been employed by the Wagner Group in various countries in the region, although for different motivations (see “Strategic Corruption” section below).

INTERNATIONAL SUPPLY OF TECHNOLOGY FOR SURVEILLANCE

Some respondents regarded the deployment of spying software against the opposition and civil society activists as a relevant form of corruption involving international actors. International private suppliers provide military-grade spying technology and equipment throughout the region. For example, an Israeli company supplied a sophisticated software called Pegasus to Ivory Coast, Kenya, Rwanda, South Africa, Togo, Uganda, Zambia, and possibly other countries in the region. There are additionally reports that the Chinese company, Huawei, offers surveillance software procured around elections by governments in the region to monitor and repress political opposition.²⁹ There are links here to typologies of strategic corruption in the region (as discussed below in the “Strategic Corruption” section).

POST-ELECTION

TASCK IN THE BROADER POLITICAL CYCLE

In analyzing TASCK, it is important to look beyond the campaigning period to consider corrupt practices that play out beyond elections. International actors who have supported elites in rigging elections might do so to seek returns on their investment in the form of corrupt deals. As one elections expert emphasized, it is important to consider elections as “part of the whole process” and “a tool used by parties to capture the state.”

QUID PRO QUO EXCHANGES BETWEEN INTERNATIONAL ENTITIES AND DOMESTIC POLITICAL SUBJECTS

After compromised elections, corrupt political appointments through cronyism, nepotism, and appointments of family members are strategies to capture the state apparatus or its parts by domestic and international networks. As was highlighted in interviews, both case studies show that the political

²⁸ “How Cambridge Analytica influenced Nigeria’s elections” Gates Cambridge., May 2022 <https://www.gatescambridge.org/our-scholars/blog/how-cambridge-analytica-influenced-nigerias-elections/>

²⁹ Lynsey Chutel. “Pegasus Lands in Africa” Foreign Policy. (28 July 2021) <https://foreignpolicy.com/2021/07/28/nso-pegasus-africa-morocco-rwanda/>; Samuel Woodhams, “Huawei, Africa and the global reach of surveillance tech.” *Deutsche Welle*, 12 September 2019. <https://www.dw.com/en/huawei-africa-and-the-global-reach-of-surveillance-technology/a-50398869>

contest in Nigeria and Madagascar is generally motivated by efforts to control natural resources with the assistance of, or on behalf of, domestic and international networks.

COMPROMISED COURT PROCESSES

Election results at different levels in the region are increasingly contested in the courts. There are judges who have legitimized elections widely regarded as fraudulent. In Phase I, this study found that the judicial sector is a key site of corruption in many African countries and a target in state capture processes. According to one civil society respondent, high-level judicial officials have been found to use offshore financial structures which are features of TASCK, as observed with judges with unexplained wealth in Kenya³⁰ and Nigeria³¹.

REGIONAL VULNERABILITIES TO ILLICIT FORMS OF POLITICAL FINANCE

As outlined in the examples above, the common denominator in TASCK schemes in sub-Saharan Africa is illicit forms of political finance. Although data are negligible, many political parties and candidates in the region are believed to solicit donations of domestic and international origin and channeled them through international financial systems to fund their day-to-day operations and campaigns. Donations and other forms of support give foreign interests the potential to shape election outcomes and manipulate future government decisions.³² There are important links between illicit political finance and natural resource revenues. One respondent explained that when natural resources are illegally exported, they can be re-channeled through elaborate money laundering schemes to sympathetic political candidates or office holders to capture state institutions for economic and political benefits. This pattern has been observed in the Madagascar and Nigeria cases (see below).

CASE STUDY: MADAGASCAR AND ILLICIT POLITICAL FINANCE

A report published by Transparency International Madagascar on the 2019 elections¹ illustrates the links between opaque sources of political finance and kleptocracy. The report concludes that “colossal amounts were deployed by the main candidates and their political parties; the origin of these funds is unknown but it’s possible some businessmen sponsored politicians in exchange for similarly unknown services.” It describes reciprocal exchanges of favors whereby firms provide funding to candidates in return for those individuals supporting restrictive investment codes that create protected enclaves of the economy for firms. One respondent described this dynamic as feeling like Madagascar is “trapped in hidden deals.”

¹ Transparency International. “L’Opacite Du Financement Politique A Madagascar.” June 2021. <https://www.transparency.mg/telechargements/lopacite-du-financement-politique-a-madagascar/>

³⁰ “News Release: Overwhelming majority of Kenyans see corruption in the judiciary, Afrobarometer survey shows.” Afrobarometer, November 2021. [news_release-overwhelming-majority-of-kenyans-see-corruption-in-the-judiciary-afrobarometer-bh-25nov21.pdf](https://www.afrobarometer.org/news_release-overwhelming-majority-of-kenyans-see-corruption-in-the-judiciary-afrobarometer-bh-25nov21.pdf)

³¹ Matthew Page. “A New Taxonomy for Corruption in Nigeria.” Carnegie Endowment for International Peace. (2018). <https://carnegieendowment.org/2018/07/17/new-taxonomy-for-corruption-in-nigeria-pub-76811>

³² Achu Check, Nicasius, Tsholofelo Madise, Nkululeko Majozi, and Yukihiro Hamada. *The Integrity of Political Finance Systems in Africa: Tackling Political Corruption*.

There are several key issues in the region that increase vulnerabilities to this form of corruption. To begin, the lack of transparency surrounding political finance is a major challenge allowing illicit sources of funds to go undetected. Actors who might push for improved accountability, both from civil society and state oversight institutions, lack data to assess the origins of funds and what influence this may have on electoral outcomes.

There remain gaps across the region in national legal frameworks governing oversight of political finance. Despite growing awareness of the risks of unrestrained flow of money in African politics, political party financing regulations, especially those relating to campaign financing are either sparse or incomprehensive. According to the International IDEA political finance database, only 33 percent of African jurisdictions have legal limits on the amount a political candidate can spend. 55 percent of African jurisdictions have no limits on the amount a donor can contribute to a political party. Importantly, 35 percent of the 51 African countries for which IDEA collects data have no ban on donations from foreign interests to political parties.³³

Implementation of the rules on political finance is weak. As one respondent described, even if regulations exist on how political donations are allowed to flow in and out of politics, they often have little to no practical impact. International IDEA concludes that provisions on political party donations and spending provisions have “almost universally no more than a symbolic meaning.”³⁴ Only Ghana and South Africa independently monitor political finance transparency and publish detailed reports and political parties’ and candidates’ expenditures.³⁵ Although institutional oversight models for political finance vary across countries in the region, common challenges stem both from the low capacity of these bodies and high levels of political interference in their operations.³⁶ In the Nigeria case study, one respondent highlighted the risks and difficulties to regulate political party financing linked to the large Nigerian diaspora abroad.

The typically low level of political party institutionalization was a vulnerability highlighted by one expert who works closely with political parties across the region. Parties often have weak internal governance and limited capacity for accounting and review of donations. It can therefore be difficult for parties to distinguish between legal and illegal sources of political financing, even if there is the will to do so.

Oversight of political party financing is challenging due to the cash-based nature of the economies and political donations across the region. Access to finance is critical as the success of opposition leaders in Africa is heavily reduced by the lack of access to state resources. Without credit, it is far more difficult for opposition candidates to co-opt other leaders, parties, and supporters into their alliances.³⁷

There are links between illicit political finance and broader challenges facing many African countries related to state fragility. Increasing evidence suggests organized crime is an important source of illicit

³³ “Funding of Political Parties and Election Campaigns A Handbook on Political Finance.” International IDEA (2014)

<https://www.idea.int/sites/default/files/publications/funding-of-political-parties-and-election-campaigns.pdf>

³⁴ Ibid. 8

³⁵ S Lipcean, F.C. Bértoa, and N Goguadze. “Post-legislative scrutiny of election campaign finance legislation,” Westminster Foundation. (2022) p.8

³⁶ Achu Check, Nicasius, Tsholofelo Madise, Nkululeko Majosi, and Yukihiro Hamada. *The Integrity of Political Finance Systems in Africa: Tackling Political Corruption*.

³⁷ Nic Cheeseman and Brian Klaas. *How to Rig an Election*. p.70

political finance. Crime syndicates penetrate local and even national government structures and institutions. The illegal drug trade, weapons smuggling, internet scams, illegal wildlife trade, and other forms of organized crime are on the rise in sub-Saharan Africa and aim at ensuring impunity through state capture. Some criminal assets are generated abroad and used for political entrepreneurship domestically. For instance, the Black Axe syndicate penetrated a state government in the Nigerian Edo state that generated globally billions of United State Dollars (USD) in revenues. Some of the illegal proceeds were in turn used to penetrate local government.³⁸

STRATEGIC CORRUPTION

There is evidence from several jurisdictions in the region that election processes can be a target for strategic corruption.³⁹ To date, the term has been used principally to describe actions in the region by actors linked to the People's Republic of China (PRC) or the Russian state. Our research shows there are several ways in which strategic corruption can manifest around elections and political processes specifically:

- **Illicit political finance:** As outlined in the previous sections, there is a severe lack of transparency and oversight of political finance. This creates a vulnerability to strategic corruption whereby foreign actors may provide financing to candidates in exchange for their support in meeting other foreign policy objectives (e.g., access to natural resources, diplomatic support). There is no reliable data to indicate the scale of any such support but there are examples to indicate this activity takes place. In the Madagascar case, individuals connected to the Wagner Group provided funding to presidential candidates.⁴⁰ One elections assessment in East Africa found that groups linked to PRC had provided free campaign materials for one party which were not recorded.
- **Spread of disinformation:** Cyber foreign interference has been on the increase in Africa. Between 2010 to 2020, cyber operations, disruptions of the electoral process, and unauthorized access through phishing and other techniques have been detected and traced to actors residing in Russia, PRC, Iran, and North Korea.⁴¹ Russia and Russian-linked private entities have been increasingly assertive in the region and have attempted to undermine democratization efforts and influence their foreign policy orientations in the CAR, Madagascar, Mozambique, and South Africa through extensive cyber disinformation campaigns.⁴² Disinformation has been used to discredit opposition or support political candidates aligned with foreign interests. Where those domestic actors are complicit in the activity, this can be considered a form of corrupt exchange.

³⁸ "Black Axe: Leaked documents shine spotlight on secretive Nigerian gang" *Africa Eye BBC News*, 13 December 2021.

<https://www.bbc.com/news/world-africa-59630424>

³⁹ United States Agency for International Development. "Anti-Corruption Policy."

⁴⁰ Finbarr O'Reilly. "How Russia Meddles Abroad for Profit: Cash, Trolls and a Cult Leader." *New York Times*. November 2019. <https://www.nytimes.com/2019/11/11/world/africa/russia-madagascar-election.html>

⁴¹ Sarah O'Connor. "Cyber-Enabled Foreign Interference in Elections and Referendums" Australian Strategic Policy Institute. (2020)

⁴² Ibid.

It should be noted that research has found that Russian-linked cyber trolling operations targeting Western elections in the United States and Europe are based in Ghana and Nigeria.⁴³

- **Threats to elections management software:** Respondents highlighted the vulnerability of elections management software as an increasing concern enabling strategic corruption. The introduction of biometric technologies, computerized voter registers, Smart Card Readers, and electronic transmission of the collated votes by EMBs have been rolled out in several African countries.⁴⁴ According to two experts interviewed, the measures are intended to promote electoral transparency and boost confidence, but they may provide entry points to domestic and foreign actors for large-scale voter manipulation. As previously noted, ahead of elections, EMBs often procure key electoral infrastructure under secretive conditions from foreign entities with unclear interests, ownership, and levels of control over the collation of votes and tabulation of results.
- **Intimidation of activists and voters:** The Wagner Group has engaged in direct intimidation of political activists, targeting pro-Western candidates, Western interests, and independent civil society. Violent mobs have been funded by the group in the CAR, Libya, Sudan, and Zimbabwe.⁴⁵
- **Elections observation:** Foreign actors may seek to infiltrate or discredit electoral observation missions. In Zimbabwe, Wagner Group political strategists were deployed as accredited and politically biased election observers to promote pro-Russian influence.⁴⁶

STRATEGIC CORRUPTION TRENDS

The Madagascar and Nigeria case studies suggest that the size of the economy, the ownership of revenues generated by natural resources, the strength of CSOs, and media freedom are factors influencing the intensity and level of strategic corruption throughout the elections cycle. As suggested by interviews, Nigerian political corruption is pervasive but is less vulnerable to the influence of foreign entities. Nigerian kleptocratic networks are mainly “home-grown” and have retained access to domestically generated resources. These networks contract international enablers whenever there is specific demand. In contrast, the relative diplomatic isolation of Malagasy political elites, the highly individualized and fragmented nature of the political environment, and the ready availability of resources for illicit extraction appear to have made the country significantly more vulnerable to strategic corruption.

⁴³ “Russia’s Emerging Threat to Elections in Africa,” *The Republic*. 2020 <https://republic.com.ng/june-july-2020/kremlins-renewed-interest/>

⁴⁴ See e.g., case study from Zimbabwe and Nigeria, Olugbemiga Afolabi. “Biometric Technologies, Electoral Fraud and the Management of Elections in Nigeria and Zimbabwe” *Obafemi Awolowo University*. (2020)

⁴⁵ Julia, Stanyard, et al. *The Grey Zone: Russia’s Military, Mercenary and Criminal Engagement in Africa*.

⁴⁶ “Fake election observation as Russia’s tool of election interference: The Case of AFRIC,” *European Platform for Democratic Elections*. April 2020. <https://www.epde.org/en/news/details/fake-election-observation-as-russias-tool-of-election-interference-the-case-of-afric-2599.html>

Motivations vary for foreign states. PRC-affiliated entities active in the case study countries seem to be more motivated by private profit than a foreign policy agenda. The capture of key institutions and local governments, through funding primaries of local, domestic politicians as seen in Nigeria and Madagascar, are motivated by access to specific natural resources extraction or access to local leadership that facilitates preferential commercial and trade conditions to Chinese individuals or companies. However, more evidence is needed to differentiate between private initiatives and state-backed corruption. In the Nigeria case study, some respondents suggested that Chinese individuals or Nigerian business entities backed by Chinese capital seem to have unhindered access to the national and state political leadership without obvious reasons. Chinese individuals interfere with local elections to co-opt local state security services through bribery, especially to secure natural resources' extraction in specific locations.⁴⁷

It should be recognized that some respondents were equally prepared to use the term strategic corruption to describe some actions by Western actors. Shielding enablers of transnational corruption, endorsing elections not perceived as credible, and the opaque provision of electoral technology, were all regarded by respondents as concerning external involvement by Western actors in the region.

RESEARCH QUESTION 1A: HOW DO THESE FORMS OF CORRUPTION AFFECT GOVERNANCE, ECONOMIC, AND/OR SOCIAL OUTCOMES?

Electoral corruption impacts the credibility of elections and political processes in many ways, reinforcing corrupt systems of governance and contributing to negative social perceptions around elections.

GOVERNANCE

In kleptocracies, there is little recourse for disputing election results. A respondent working in Madagascar noted that judges only consider cases that will not modify the result of elections (i.e., that only affect a small percent of the vote), but do not consider the larger impact or cumulative effect of these cases. An African Union brief notes that in practice, progress in electoral justice mechanisms in Africa “is inconsistent with implementation on the ground... and marred by procedural discrepancies, undue prolongations, legal fissures, and restrictions.”⁴⁸ Low credibility of electoral justice mechanisms contributes to an overall lack of credibility of electoral systems.

Corruption in elections and political processes is inherently linked to systemic governance issues. The impact of electoral corruption is wide-ranging in that it filters down to other institutions, e.g., control of the presidency may result in control of legislative bodies and other institutions as well as enactment of laws and regulations favoring incumbents. As one respondent put it, “it [electoral corruption] enables you to choose all key players,” fostering widespread impunity and structural resistance to reform.

ECONOMIC

Several literature review sources discuss the implications of the lack of regulation around political finance and foreign donations. Research by Transparency International (TI) notes that recipients of

⁴⁷ Matthew Page. “The Intersection of China’s Commercial Interests and Nigeria’s Conflict Landscape.” United States Institute of Peace (2018) (<https://www.usip.org/sites/default/files/2018-09/sr428-the-intersection-of-chinas-commercial-interests-and-nigerias-conflict-landscape.pdf>)

⁴⁸ African Union. “Towards Corruption Free Electoral Processes: Strengthening Electoral Integrity in Africa.” p 9

donations may be “beholden to... foreign powers and their interests,” and that criminals may similarly advance their interests through donations coming from illicitly gained funds.⁴⁹ Lack of regulation of political finance “undermines public confidence” and is cited as a factor contributing to low electoral participation.^{50,51}

SOCIAL

Respondents and desk research both noted that in many countries in sub-Saharan Africa, there is general public acceptance that corruption is deeply entrenched in elections and political processes. One respondent suggested that in Nigeria, there is an “understanding across all political parties and political aspirants that public office at all levels can be used for private enrichment and political entrepreneurship of networks of choice by an incumbent.” This contributes to a sense of disillusionment or demoralization in electoral processes and low voter turnout.⁵² A few respondents noted that many citizens believe there is no point in voting if the system is already rigged toward a particular party or candidate.

Corruption in elections and political processes supports the status quo and prevents the selection and election of political candidates from a more representative cross-section of the electorate. One of the reasons why sub-Saharan Africa has low participation of women in politics is that female politicians do not have the same level of access to domestic and international financial networks and capital.⁵³ One respondent reported that “parties almost never give female candidates the money they need to be successful,” and that lack of transparency in internal party financing facilitates the exclusion of female candidates.

RESEARCH QUESTION 2: HOW, IF AT ALL, ARE USAID AND OTHER ACTORS ADDRESSING TASCK WITHIN THE ELECTIONS AND POLITICAL PROCESSES SECTOR?

OVERVIEW

Although USAID and other development agencies run extensive electoral assistance programs across sub-Saharan Africa, our research shows that these agencies have tended not to undertake activities that directly target the forms of corruption constituting TASCK. Support to electoral administration and management, voter education, and electoral monitoring are the predominant forms of election programming. There are nonetheless several types of initiatives that indirectly play a role in countering these issues and are described in the following sections. Several key organizations are working on

⁴⁹ Duri, Jorum and Resimić, Miloš. “Political finance oversight: Key institutions and mechanisms in sub-Saharan Africa.” Transparency International. (12 April 2022), 2-3

⁵⁰ Sefakor Ashiagbor. “Party Finance Reform in Africa.” National Democratic Institute, (2005). 3

⁵¹ Oscar Gakuo Mwangi. “Political Corruption, Party Financing and Democracy in Kenya.” *The Journal of Modern African Studies* 46, no. 2 (2008): 267–85. <http://www.jstor.org/stable/30225924>.

⁵² African Union. “Towards Corruption Free Electoral Processes: Strengthening Electoral Integrity in Africa.” 6-7

⁵³ E.g. here: “Women’s Political Participation: African Barometer” International Idea. 2021

<https://www.idea.int/sites/default/files/publications/womens-political-participation-africa-barometer-2021.pdf>

related themes, notably International IDEA, the International Foundation for Electoral Systems (IFES), Transparency International, and the Westminster Foundation for Democracy.

Part of the reason for the lack of direct development programming is the political nature of the issues: there are rarely willing government partners and few incentives for corrupt actors to engage in what is a critical arena for state capture processes. However, as one elections expert described, development agencies perceive these as intractable issues and often do not have a clear sense of how they might usefully contribute to combating the problems.

The USAID Electoral Assessment Framework provides the basis for how USAID develops an engagement strategy for a country and sets out the issues which may be covered by programming.⁵⁴ One election expert noted that transnational and strategic corruption have not to date typically been analyzed in elections assessments. Key elections work relevant to the region include the Democratic Resilience and Innovation Fund, the Elections and Political Processes Fund, Consortium for Elections and Political Processes Strengthening, and the Supporting Transitions and Electoral Processes program.⁵⁵

In practice, however, many elections experts who were interviewed indicated that it is rare for development agencies including USAID to focus on this topic specifically. This again is partly due to the political sensitivity of the topic. Activities targeting political party and candidate finance are costly, time intensive, and require transnational and multi-stakeholder collaboration. There are established working practices that see a challenging topic de-prioritized in the face of multiple competing priorities. One long-time election monitoring expert said that there are established views on the sequencing of issues, noting “transitional elections tend to postpone or set aside issues of political financing. In the first two or three elections the priority is competitiveness.” However, the relative neglect of political financing in the early stages of democratization can reinforce efforts by domestic elites to exploit conditions for the pursuit of their own interests. Calculated policy and operational risks within programming in highly complex environments need to prioritize political finance within an effective regulatory framework to minimize these risks.

The following section provides some examples of programs and projects supported by development partners that have relevance to TASCK. The categorization below is based on the USAID Guide to Countering Corruption Across Sectors.⁵⁶ The section below is not exhaustive but illustrates different programmatic approaches against the identified vulnerabilities to TASCK in the elections and political processes sector.

⁵⁴ United States Agency for International Development. “Electoral Assessment Framework: A Tool to Assess Needs, Define Objectives, and Identify Program Options.”

⁵⁵ United States Agency for International Development. “United States Strategy on Countering Corruption.” Washington, DC: United States Agency for International Development, 2021. <https://www.whitehouse.gov/wp-content/uploads/2021/12/United-States-Strategy-on-Countering-Corruption.pdf>; United States Agency for International Development. “User’s Guide to Democracy, Human Rights, and Governance” Washington, DC: United States Agency for International Development (2022). <https://www.usaid.gov/sites/default/files/2023-01/DRG-Center-Users-Guide-2022.pdf>

⁵⁶ United States Agency for International Development. “USAID Guide to Countering Corruption Across Sectors.”

TRANSPARENCY AND AWARENESS RAISING

SUPPORTING CSO-LED TRANSPARENCY EFFORTS

Transparency is considered indispensable as a basis for detecting and addressing TASCK forms of corruption around the elections cycle. In this regard, development agencies have provided support to CSOs that have looked to increase the level of public information on political finance. Respondents stated that this work has tended to focus on campaign expenditure as it is easier to observe and track this activity than other forms of political finance, such as political candidates and parties' donations or financing of political parties' primaries and nominations. As an example, the Alliance for Finance Monitoring published research reports on unregulated spending for the 2021 Uganda elections.⁵⁷ The Westminster Foundation's Cost of Politics project produced several research reports on expenditures by political parties and candidates in the region.⁵⁸ CSOs have, however, often struggled to shed light on the origins of political finance.

MAPPING POLITICAL FINANCE LEGISLATION

In addition to campaign expenditure, International IDEA's database of political finance legislation provides clarity on legal standards across the region. Alliance for Finance Monitoring is developing a political finance index specifically for the African region. This aims to provide data to compare countries' level of commercialization of politics as well as the state of regulatory and institutional frameworks for overseeing political finance. However, this should be starting point rather than an end in itself.

ASSET AND INCOME TRANSPARENCY

Asset and income disclosure requirements for politicians and political candidates can be considered as a type of transparency measure. One respondent referred to a U.S. Department of State Bureau of International Narcotics and Law Enforcement Affairs (INL) grant to Eastern European CSOs they believed to be a success in implementing a disclosure regime that may be replicated in sub-Saharan Africa with a focus on asset disclosures. However, despite robust legal and institutional asset declaration frameworks in many sub-Saharan African countries, the enforcement of effective asset declaration schemes often meets strong resistance within the public service, especially when it comes to public disclosure of wealth held in foreign jurisdictions.⁵⁹

USING DIGITAL TOOLS FOR TRANSPARENCY

As the online space plays an increasingly significant role in elections, some organizations have advocated for improved transparency in this arena. Both International IDEA and IFES have launched initiatives related to digital transparency. The former has produced research that tracks sources and destinations of online expenditure, although this work has not yet extended to sub-Saharan Africa.⁶⁰ IFES recently launched a Global Online Campaigning Transparency Community. Social media and search engine companies have created digital ad libraries, which provide an additional source of information on

⁵⁷ Alliance for Finance Monitoring. "Pre-Campaign Spending for Uganda Elections." (2021). <https://acfim.org/pre-campaign-spending-for-uganda-elections-2021/>

⁵⁸ Westminster Foundation for Democracy. "Cost of Politics"

⁵⁹ Marie Chêne. "African experience of asset declarations." U4 (2008). <https://www.u4.no/publication/african-experience-of-asset-declarations.pdf>

⁶⁰ International IDEA. "Money in Politics in the Digital Age." *International Idea Money in Politics*. (21 March 2023). <https://www.idea.int/news-media/multimedia-reports/money-politics-digital-age>

campaigns, although one respondent noted that these are of variable depth and quality for sub-Saharan African countries.

PERSISTENT INFORMATION GAPS

Despite these efforts, there are vast information gaps that hinder other forms of development programming to counter the issues. One expert expanded further on the data problem, commenting that sub-Saharan Africa compares unfavorably to other regions when it comes to the availability of data on political finance. They said:

“What is missing is the triangulation of data. Even for election campaign expenses – this data first has to be reported to authorities who should then compile and publish it in a comprehensive manner. That’s the baseline and it’s weak in Africa. Beyond that, we should be able to cross-check this data against other publicly disclosed data, like procurement, beneficial ownership, and company registry data. Multiple data points must be available, but they are not.”

These persistent challenges suggest this is a potential entry point for programming and would provide a platform for accountability initiatives (see research question 3 section below, which expands on entry points for programming).

SOCIAL AND INSTITUTIONAL ACCOUNTABILITY

Per the USAID Guide on Countering Corruption Across Sectors, programming on social and institutional accountability encompasses both support to government oversight institutions and civil society in efforts to pursue accountability externally. Examples are provided for each below.

SUPPORT TO ELECTORAL OVERSIGHT INSTITUTIONS

African countries have different models in place for oversight of political finance. EMBs are the most common model although in some jurisdictions this role is assumed by a ministry or audit institution. Hybrid models are in place in some countries.⁶¹ Oversight would typically consist of activities such as assessing party and candidate compliance with political finance regulations; collecting and reviewing disclosures and accounts; and communication and training on regulations.

Capacity building for these institutions is a common form of development programming but, based on discussions with a range of experts, the study found it is relatively unusual for this to focus on political finance specifically. One political finance expert commented, “One of the issues is that when it comes to overseeing political finance issues, the oversight agencies don’t see it as a priority issue due to having to deal with administrative issues relating to elections.” One exception was USAID’s support through IFES for the Training in Detection and Enforcement program.⁶² The program developed laws, training, and technical assistance for political finance regulators. However, some respondents noted that the impact of similar programs can be limited. Capacity-building measures tend to be technical and are hindered by the lack of local ownership and political interference.

An illustration of the challenges comes from Nigeria where development agencies have found it difficult to get traction on these issues. One respondent disclosed that the Nigerian Independent National

⁶¹ Duri, Jorum and Resimić, Miloš. “Political finance oversight: Key institutions and mechanisms in sub-Saharan Africa.” 3

⁶² International IDEA. “Funding of Political Parties and Election Campaigns A Handbook on Political Finance.”

Electoral Commission (INEC) has been repeatedly challenged by development agencies on procurement practices, a potential vulnerability for TASCK. INEC has received substantial support through training manuals, strategic planning, conflict dashboards, election tribunals, training for electoral commissions, information technology systems for elections, and political party financing. However, as a few respondents noted, INEC does not demonstrate an appetite to look at political finance or conduct proper audits of voter registration.

Electoral assistance from regional bodies to EMBs including corruption risk assessments is growing in sub-Saharan Africa. For example, South Africa and other Southern African Development Community countries offer electoral support to EMBs of other Southern African Development Community member countries.⁶³ Donors in the region increasingly receive sensitization around relevant strategic corruption threats, in particular disinformation. The Digital Frontiers Project commissioned by USAID issued a guide on *Electoral Cybersecurity: A Brief Guide for Donor Program Development*.⁶⁴

SUPPORT TO CSOS, INCLUDING INVESTIGATIVE JOURNALISM

Where EMBs and other oversight institutions do not provide adequate oversight of political finance or electoral integrity, development agencies have alternatively provided support to CSOs, although programming in this area is relatively limited. One example of a multi-country program is the Strengthening Accountability Networks Among Civil Society project, which involves networking and collective advocacy by 26 countries including many in Africa. The project aims to challenge transnational vested interests and weak national checks and balances with a focus on political integrity and financing. The project builds peer-to-peer networks to pool expertise and skills across national borders.⁶⁵

Some national CSOs have undertaken initiatives on political finance, although many steer away from this topic due to the high security risks. As an example, TI Madagascar’s work on state capture has supported advocacy against the ties between the private sector and political players and highlighted risks of state capture through political parties’ and candidates’ financing.⁶⁶ Ahead of the elections in 2023, the organization has produced a full “judicial audit” of standards of political finance regulation in the country.⁶⁷

Some respondents praised USAID, the U.S. government more broadly, and non-governmental organizations for their support of African journalists and independent media. This support includes investigative journalists’ work regarding dirty money in political financing, PEPs asset declarations, and other transnational corruption themes linked to the financing of political activities at the global level. Investigative journalists highlighted in interviews the value of USAID individual capacity-building and networking with international organizations specializing in political finance and PEPs. Other funders such

⁶³ ACE Project. “The Electoral Knowledge Network: Donor Funding” <https://aceproject.org/ace-en/topics/em/emg/who-finances-embs-and-how/emg03d/default>

⁶⁴United States Agency for International Development. “Electoral Cybersecurity: A Brief Guide for Donor Program Development.” Washington, DC: United States Agency for International Development (2023). <https://www.usaid.gov/sites/default/files/2023-06/Cybersecurity-Programming-Guide-USAID.pdf>

⁶⁵ Transparency International. “Strengthening Accountability Networks Among Civil Society” <https://www.transparency.org/en/projects/strengthening-accountability-networks-among-civil-society-sancus>

⁶⁶ Transparency International. “Le financement des campagnes électorales en Madagascar.” (April 2022). <https://www.transparency.mg/telechargements/le-financement-des-campagnes-electorales-a-madagascar>

⁶⁷ Ibid.

as the Open Society Foundation, National Endowment for Democracy, the MacArthur Foundation, and other governmental and non-governmental development partners have provided capacity-building, information exchange, political support, and logistical assistance to journalists in specific countries.

This support sometimes entails connecting African journalists to international networks, such as the International Consortium of Investigative Journalists. The global support to Organized Crime and Corruption Reporting Project (OCCRP) supported by the USAID Strengthening Transparency and Accountability through Investigative Reporting program since 2007 was highlighted by one respondent as an essential element in exposing endemic political corruption in Nigeria and the risks associated with “dirty money” in politics.

Global initiatives have been instrumental in creating anti-corruption networks in Madagascar, Nigeria, and across sub-Saharan Africa. Collaborative approaches are reported to help local journalists to produce high-quality content that explains grand and transnational corruption, including naming PEPs involved in corruption. An elections expert specifically noted that collective efforts help to reduce censorship and mitigate the risks and fear of repression from authorities. TI and other international NGOs supported by the *Gesellschaft für Internationale Zusammenarbeit* (GIZ) have started supporting investigative work on illicit finance and asset tracking with specific training on Open-Source Intelligence and using global financial leaks.

PREVENTION

Preventative work on TASCK related to elections and political processes appears to be an under-explored area in existing programming. Relevant strands of work for TASCK are voter education and information campaigns and direct engagement with political parties and candidates.

VOTER EDUCATION AND INFORMATION CAMPAIGNS

Voter education and information campaigns in some instances seek to highlight candidate integrity as a relevant issue for voter consideration. One aim is to prevent the re-election of corrupted candidates. In Madagascar, CSOs have been preparing candidate profiles that summarize a candidate’s record on integrity for voters. In Nigeria, the MacArthur Foundation provided USD 6.5 million in grants to seven CSOs to monitor anti-corruption pledges by state-level politicians. According to one respondent, the same approach was taken before the 2023 elections: political candidates were incentivized to roll out plans to combat large-scale corruption in different sectors if elected, including corruption in elections processes. Extensive research has nonetheless shown limits to voter education programs related to corruption given that vote-selling and clientelist practices remain predominant determining factors over voter choices.⁶⁸

DIRECT ENGAGEMENT WITH POLITICAL PARTIES AND CANDIDATES

Across the region, there is limited work on integrity building with political candidates and parties. One expert described this as a real weakness and a neglected area relative to support to EMBs and CSOs. There are significant political barriers to this type of work. It is a challenge in many African countries because of the exceptionally high number of political parties. One respondent commented that consequently, “You can’t expect proper accounting and they lack the capacity to handle money

⁶⁸ Louise Bøttkjær, & Mogens Justesen. “Why Do Voters Support Corrupt Politicians? Experimental Evidence from South Africa.” *The Journal of Politics*. 10.1086/710146. (2020).

properly.” Some international NGOs have undertaken work in this area. The National Democratic Institute for example has a long-running program of capacity-building work with political parties globally, which incorporates elements focused on integrity and trust in politics. The key challenge is finding the right political incentives for parties to participate in such schemes.

EARLY WARNING MECHANISMS FOR ELECTIONS-RELATED CONFLICTS

Separately and of note is the wide investment by development agencies in early warning mechanisms for conflicts related to elections.⁶⁹ This study shows that these mechanisms do not typically incorporate analysis of corruption issues and in particular financing of political and security actors. However, due to the links to state fragility, strategic corruption may be a relevant issue to consider as part of efforts to anticipate unrest and instability in election cycles in sub-Saharan Africa.

DETECTION

INSTITUTIONAL SUPPORT

Detection of concerns related to political finance has been partly addressed through institutional support to national Supreme Audit Institutions (SAIs) and equivalent bodies. The Fighting Illicit Financial Flows in Africa program, implemented by GIZ and funded by the European Commission and the Government of Finland, supports the African Organization of English-speaking SAIs in Africa and the East African Association of Anti-Corruption Authorities. The aim is partly to strengthen the collaboration between SAIs and Anti-Corruption Authorities to address cross-border cooperation of illicit financial flow (IFF) enablers and partly to track and recover stolen assets including PEPs.

As we see in the Madagascar case study, in the 2018/19 election cycle, the *Commission de Contrôle du Financement de la Vie Politique* produced commendable results highlighting non-compliance with political finance rules, even while operating in a kleptocracy. USAID is additionally providing support to Madagascar’s Court of Accounts through its *Tantana* program. A respondent familiar with the program noted that the Court of Accounts produced audits of public finance during the pandemic. Audit institutions may in some contexts enjoy greater freedom to work on political finance than anti-corruption agencies and EMBs in that they are perceived as a more technical form of intervention. Further research is needed on the models which can be effective in detecting abuses.

PEER REVIEW PROCESSES

In addition, the detection of illicit finance is addressed to some extent through the United Nations Office on Drugs and Crime (UNODC)-sponsored United Nations Convention Against Corruption (UNCAC) peer-review processes. Respondents reported that many sub-Saharan African countries including Nigeria are well engaged in the process, which is generally perceived by the African political leadership as more objective and not linked to any foreign influence. The peer review process evaluates national legal and institutional frameworks in several areas that are crucial to prevent and detect transnational corruption in political financing.

⁶⁹ United States Agency for International Development. “Mitigating Election Violence Through National Early Warning Systems.” (2019). https://2017-2020.usaid.gov/sites/default/files/documents/1860/NEWS_Fact_Sheet_Feb_2019.pdf

RESPONSE

SUPPORT TO LAW ENFORCEMENT BODIES

Development agencies and other actors have struggled to support ways to ensure repercussions for individuals and organizational entities within networks involved in the various forms of corruption related to elections and political processes. Support to law enforcement bodies, in particular anti-corruption agencies and judicial authorities, is a common form of programming across the region. One key expert noted that this form of programming is rarely connected to enforcement efforts related to elections activities specifically, despite this being a key area of risk. One exception comes from the Nigeria case where respondents noted how roundtables and informal communication between law enforcement, media, and CSOs have been useful in exchanging actionable intelligence regarding illegal political parties' and candidates' financing.

INFORMATION SHARING TO COUNTER TASCK

The Economic Financial Crimes Commission and the Independent Corrupt Practices & Other Related Offences Commission, the two leading anti-corruption law enforcement agencies in Nigeria, exchanged strategically with media and civil society before the 2023 elections in formal and semi-formal meetings about corruption risks within the electoral cycle including vote-buying, lack of transparency in political financing, and financing of electoral violence.¹

Regionally, the Open Society Initiative for West Africa and other local and international NGOs have developed Situation Room models for engaging civil society throughout an electoral campaign. The model collects and disseminates threats and reports of violence including hate speech and vote buying. The activity has been successfully implemented in several countries, including Nigeria.²

¹ "ICPC to partner EFCC, others to end vote-buying, corruption." *The Guardian*. July 2022. <https://guardian.ng/news/icpc-to-partner-efcc-others-to-end-vote-buying-corruption/>

² Mamadou Diallo. "Inside a Virtual "Situation Room" for West Africa's Election Observers." Open Society Foundation. (2 February 2017). <https://www.opensocietyfoundations.org/voices/inside-virtual-situation-room-west-africa-s-election-observers>

COUNTERING MIS-, DIS-, AND MAL-INFORMATION

Work by USAID and other actors on misinformation, disinformation, and malinformation in effect represents a response to a form of strategic corruption, even while programming may not have originally been instigated with this threat in mind. To give one example, the Open Society Foundation has been supporting global efforts under the Elections and Democracy in the Digital Age pillar to generate a set of recommendations on how new technologies, social media platforms, and communication tools can be harnessed to strengthen the integrity of elections.⁷⁰

REPATRIATION OF STOLEN ASSETS FROM ABROAD

Repatriation of stolen assets from abroad is an important form of response to TASCK. The topic has received high political support across sub-Saharan Africa as recently articulated in the Common African

⁷⁰ "How the Open Society Foundations Support Election Integrity." Open Society Foundation. 18 March 2020. <https://www.opensocietyfoundations.org/newsroom/how-the-open-society-foundations-support-election-integrity>

Position on Asset Recovery and noted by several respondents.⁷¹ The UK Foreign Commonwealth and Development Office (FCDO) Monitoring of Recovered Assets through the Transparency and Accountability (MANTRA) project in Nigeria supported CSOs in the disbursement of Sani Abacha’s returned loot from Angola, Kenya, Madagascar, Mozambique, South Africa, and the United States are examples of countries where development agencies have supported efforts to track and repatriate assets associated with state capture and PEPs corruption.⁷²

SANCTIONS

Some respondents noted the need for increased regional consultation on the goals of U.S.-imposed sanctions (e.g., asset freezing, visa and travel bans) within the election cycle. Policymakers and the public in sub-Saharan Africa are often not aware of how sanction regimes function and their intended goals. They can sometimes be perceived as an unjust form of foreign interference. Respondents highlighted that more research is needed to understand the impact of sanctions on TASCK.

FINDINGS: NATURAL RESOURCES

RESEARCH QUESTION I: HOW DOES TASCK MANIFEST WITHIN THE NATURAL RESOURCES SECTOR IN THE REGION?

REGIONAL OVERVIEW

Corruption in the natural resources sector in sub-Saharan Africa has been extensively researched. Due to their economic significance, the largest body of research covers the extractives sectors – oil and gas and mining.⁷³ Anti-corruption campaigning groups have long focused on international firms operating in these sectors, highlighting the links with kleptocracy.⁷⁴ The extraction of critical minerals needed for the energy transition has further brought renewed attention to corruption risks across these supply chains.⁷⁵ The extensive work on environmental crimes related to other forms of natural resources (such as wildlife, forestry, fisheries, and land) increasingly highlights the criticality of corruption. Corruption is often “embedded in natural resource management systems themselves,” requiring us to consider the “rules in use” rather than see natural resource corruption as an aberration.”⁷⁶ Value chain analysis for all these resources shows international actors (firms, organized crime groups, enabling professions, and in some circumstances, states) shape and work within these rules.⁷⁷

⁷¹ African Union “Common African Position on Asset Recovery (CAPAR)” (24 October 2022).

<https://au.int/en/documents/20221024/common-african-position-asset-recovery-capar>

⁷² World Bank. “Addressing Anti-Corruption, Money Laundering & Asset Recovery” <https://star.worldbank.org/>

⁷³ Alexandra Gillies. *Crude Intentions: How Oil Corruption Contaminates the World*. (New York, NY: Oxford University Press, 2020)

⁷⁴ Aaron Sayne, Alexandra Gillies, and Christina Katsouris. “Inside NNPC Oil Sales: A Case for Reform in Nigeria.” Natural Resource Governance Institute. (August 2015)

https://resourcegovernance.org/sites/default/files/NRGI_InsideNNPCoilSales_CompleteReport.pdf

⁷⁵ Natural Resource Governance Institute. “Preventing Corruption in Energy Transition Mineral Supply Chains” (December 2022). <https://resourcegovernance.org/analysis-tools/publications/preventing-corruption-energy-transition-mineral-supply-chains>

⁷⁶ Williams, Aled, et al. *Corruption, Natural Resources and Development*. (Edward Elgar Publishing ISBN: 978 1 78536 119 7. 2017)

⁷⁷ TRAFFIC. “Timber Island: The Rosewood and Ebony Trade of Madagascar ” (2017).

<https://www.traffic.org/publications/reports/timber-island-the-rosewood-and-ebony-trade-of-madagascar/>

A common thread linking all natural resources is that they can be a target for capture by elites across the region as they develop and maintain kleptocracies. This is a process frequently enabled by transnational connections. **Table 6** provides an organizing framework for exploring how TASCK manifests in the sector, highlighting the areas where these forms of corruption coalesce.⁷⁸ The framework focuses on the national level, where USAID has the most scope to support responses, but draws out international connections. Brief commentary is provided on each area following the table.

Table 6: TASCK Framework for the Natural Resources Sector

AREA OF VULNERABILITY TO TASCK	ACTIVITIES	EXAMPLES OF TRANSNATIONAL AND STRATEGIC CORRUPTION
Securing access to natural resources	<ul style="list-style-type: none"> Opening areas for extraction. Allocation of licenses and rights. Land acquisition and resettlement. 	<ul style="list-style-type: none"> Improper influence over rule-making by international firms (private and state-linked). Bribery by international firms to secure access to natural resources. Access to resources granted in exchange for state security /political assistance.
Operations	<ul style="list-style-type: none"> Legal and illegal operation of sites. Management of environmental, social, and human rights impacts. Procurement and sub-contracting on operations. Transportation of natural resources across borders. 	<ul style="list-style-type: none"> Improper influence by international firms over rules related to environmental, social, and human rights issues at sites. Bribery/improper influence to prevent proper enforcement of rules by officials, including customs and border agents. Improper award of sub-contractors to politically connected firms/fake contracts for incomplete work. Corruption in auxiliary contracts for operations (e.g., connected infrastructure). Manipulation of certification schemes. Illegal exports enabled by banks, lawyers, transportation firms, and other professional enablers.
State revenue collection	<ul style="list-style-type: none"> Negotiation of commercial terms with operators. Collection of taxes, fees, royalties, custom duties, etc. Sales of natural resources by state entities. 	<ul style="list-style-type: none"> International firms under-report production and/or revenues for tax evasion purposes. Improper allocation of commodity sales contracts to commodity trading firms. Laundering of funds from illicit sales of natural resources.
State revenue management	<ul style="list-style-type: none"> Allocation of state revenues to savings and investment vehicles. Resource-backed loans (RBLs). Allocation of revenues to subnational authorities. 	<ul style="list-style-type: none"> Embezzlement of state funds facilitated by professionals such as regional/international banks, auditors, lawyers, and consultants. Unfavorable terms on RBLs allow the lender to make undue profit. Funds from RBLs misallocated for political purposes.

⁷⁸ The framework is based on the Natural Resource Governance Institute’s corruption diagnostics tool with minor adaptations to emphasize transnational dimensions to the issues; Alexandra Gillies, et al. “Diagnosing Corruption in the Extractive Sector: A Tool for Research and Action.”

AREA OF VULNERABILITY TO TASCK	ACTIVITIES	EXAMPLES OF TRANSNATIONAL AND STRATEGIC CORRUPTION
State-owned enterprises	<ul style="list-style-type: none"> Critical actors within many sectors often play production, regulatory, and revenue collection roles. 	<ul style="list-style-type: none"> International firms engage in bribery/improper influence to secure access to state-owned enterprises (SOEs) business opportunities. Auditors and legal representatives turning a blind eye to embezzlement of SOE funds.

SECURING ACCESS TO NATURAL RESOURCES

Corruption is a mechanism through which international actors, or domestic actors supported by international connections, gain access to natural resources. Bribery to obtain rights to a concession or license to operate is a common issue relevant to all forms of natural resources. Corrupt actors may seek to improperly influence the rules around how rights are allocated. For example, timber traders in Madagascar used funds generated from international sales to become elected members of the National Assembly. This provided a route to influencing national forestry policy, including the timing and scope of logging moratoriums. Another means by which international firms might gain a foothold in the sector is through partnerships with politically connected firms with conflicts of interest; this is a typology that has been exposed across the region in oil and gas and mining.⁷⁹

Corruption of these forms represents a collaboration between international and domestic actors. Maintaining access is often an ongoing process and not a one-off. As one staff member from a development agency in Madagascar put it, “If money is paid directly to specific people, it goes back up the government hierarchy and authorizations can be obtained. Even if you already hold permits for mining or for other activities, obstacles are set up by new governments so that you have to pay again.” Opaque decision-making processes and licensing agencies with low capacity and independence of government are key vulnerabilities increasing country exposure to these issues.

OPERATIONS

Transnational linkages are particularly critical for the illegal extraction of natural resources. To reach international markets, illegally traded resources rely on “shadow value chains,” which are “often parallel to or intertwined with legal value chains.”⁸⁰ International actors play different operational roles including direct extraction of resources, transportation, financing, processing, and purchasing. Research on the role of corruption in these processes is most developed in the mining sector and wildlife trade.⁸¹ Bribery of state officials responsible for conservation, border controls, and customs is a necessity for these operations to run. The goal may be to secure active complicity or simply ensure these actors turn a blind eye to illicit operations. This extends to legalized operations where firms may use bribery and/or

⁷⁹ Alexandra Gillies. *Crude Intentions: How Oil Corruption Contaminates the World*.

⁸⁰ Åse Gilje Østensen & Mats Stridsman. “Shadow Value Chains Tracing the link between corruption, illicit activity and lootable natural resources from West Africa” *U4 Issue*. June 2017 No. 7. (2017). <https://www.u4.no/publications/shadow-value-chains-tracing-the-link-between-corruption-illicit-activity-and-lootable-natural-resources-from-west-africa.pdf>

⁸¹ Clement Rabenandrasana et al. “The gold sector in Madagascar: at the heart of illicit practices.” *U4*. <https://www.u4.no/publications/the-gold-sector-in-madagascar-at-the-heart-of-illicit-practices>

improper influence to exceed extraction limits. In fisheries, for example, there are cases of foreign industrial fishing firms exceeding fish stock quotas or operating clandestinely.⁸²

In many prominent cases, this illegal trade is organized at the regional level. Armed groups and political elites are connected to trade across all countries, often blurring state-sanctioned goals and personal profit. The extensive research on the mining sector in Central and East Africa, for example, shows jurisdictions fulfill different roles in the shadow value chain. Rwanda, Tanzania, and Uganda serve as the major points of export for resources (minerals and to a lesser extent logging) often obtained illegally, notably from the DRC.⁸³ Funds generated are used to finance “regime retention projects,” as one civil society activist noted.

The operational arena is significant when considering how to address TASCK as it represents the point of connection to the international economy. Access to finance – whether from formal or informal financial systems – and logistics are critical for moving physical goods and funds. Across cases, the United Arab Emirates (UAE) emerges prominently as an end destination for the illegal trade in resources, having notoriety as a smuggler of wildlife, gold, and diamonds despite, as one expert put it, appearing as though “they are running a clean operation.” Consumer demand in Asia for wildlife and forestry products has had a strong bearing on the flow of illegal goods and therefore the prevalence of corrupt practices.

STATE REVENUE COLLECTION

There are multiple forms of natural resource corruption related to revenue collection. These include undue influence over the making of laws and regulations and their enforcement; bribery or favoritism to influence contract terms; corruption in state commodity sales; and illegal taxation in fragile and conflict-affected settings.⁸⁴ Tax avoidance and evasion by multinational firms operating in the region in oil and gas and mining receive the most attention, but distortions in revenue collection are relevant to other forms of natural resources. Available data suggest gold, diamonds, and platinum are the types of resources most adversely affected by trade mis-invoicing.⁸⁵ These activities often require corrupt collaboration with domestic actors, while accountants, lawyers, and consultants (located domestically and internationally) play important enabling roles. Direct sales of natural resources by state bodies are a significant problem area where forms of TASCK are prevalent.

STATE REVENUE MANAGEMENT

This area of vulnerability concerns how natural resource revenues are managed and spent. Although corruption here may principally take place at the domestic level, there can be important international dimensions. Political leaders embezzling funds commonly seek to launder this wealth into international

⁸² “Fisheries: Home” Curbing Corruption. <https://curbingcorruption.com/sector/fisheries/>; <https://theconversation.com/how-illegal-fishing-harms-nigeria-and-what-to-do-about-it-160553>

⁸³ Global Witness, “Time to Dig Deeper.” (August 30 2017) <https://www.globalwitness.org/en/campaigns/democratic-republic-congo/time-dig-deeper/>; World Wildlife Foundation, “Timber Movement and Trade in Eastern Democratic Republic of Congo.” (2012) https://d2ouvy59p0dg6k.cloudfront.net/downloads/regional_timber_movement_and_trade_summary_english.pdf

⁸⁴ Natural Resource Governance Institute. “Step 4 Research Guide: Revenue Collection.” In *Diagnosing Corruption in the Extractive Sector: A Tool for Research and Action* (August 2021) https://resourcegovernance.org/sites/default/files/documents/step_4_research_guide_revenue_collection.pdf

⁸⁵ Carlotta Schuster. “Economic Development In Africa.” UNTAD (2020). https://unctad.org/system/files/non-official-document/aldc2020_edarwebinar-30-11_schuster_en.pdf

assets with the process made possible by enabling actors (such as accountants, bankers, professionals at company service providers, and lawyers), intermediary jurisdictions, and gaps in the international anti-money laundering regime. Nigeria is a particularly well-evidenced example but cases involving the laundering of funds from diverse types of natural resources are apparent across the region.⁸⁶ Respondents from the two case study countries discussed the problem of illicit finance from natural resources being funneled to political campaigning via circular external routes.

THE ROLE OF SOVEREIGN WEALTH FUNDS IN TASCK

State management of funds may involve the international investment of funds through vehicles such as sovereign wealth funds and savings and investment funds. This can entail corruption when there is limited oversight and transparency. Embezzlement and misallocation of revenues from the Angolan sovereign wealth fund in the 2010s represent an egregious example and concerns have been highlighted around Nigeria's Excess Crude Account.¹ African states have looked to leverage natural resource wealth to obtain sovereign debt through RBLs. Research by the Natural Resource Governance Institute (NRGI) found 11 countries in sub-Saharan Africa took out 30 RBL between 2004 and 2018 with a value of USD 66 billion. Chinese policy banks are the largest lenders.² There is typically limited transparency around the deals, and some have been the subject of corruption allegations. Depending on the context, these loans could be considered forms of strategic corruption (see "Strategic Corruption" section below).

¹ Pallavi Roy, et al. "When rainy day funds run dry: corruption and mismanagement of Nigeria's Excess Crude Account" *Anti-Corruption Evidence Project. Working Paper 045*. <https://eprints.soas.ac.uk/37907/1/ACE-WorkingPaper045-Nigeria-ECA.pdf>

² David Mihalyi, Aisha Adam and Jyhjong Hwang. "Resource Backed Loans: Pitfalls and Potential." Natural Resource Governance Institute. (2020).

STATE-OWNED ENTERPRISES (SOES)

SOEs are a common target in state capture processes, particularly those which manage and oversee rents from high revenue-generating natural resource sectors. They are at risk because they "exist in a gray area between the public and private sectors, well within reach of political influence but outside the control of many formal government oversight institutions."⁸⁷ They frequently straddle multiple roles in the extractives sectors, being both an active participant in production and overseeing sectoral management.⁸⁸ They work with various types of international partners such as commodity trading, servicing, and exploration and production firms. Their activities are supported by a range of international service providers such as auditors, lawyers, and consultants.⁸⁹ SOEs in kleptocracies across the region have been connected to corruption schemes, typically with transnational dimensions. In both Madagascar

⁸⁶ Tom Burgis, *The Looting Machine* (PublicAffairs: 2015); Ricardo Soares De Oliveira. "Researching Africa and the Offshore World." *The Journal of Modern African Studies* 60, no. 3 (2022): 265–96. <https://doi.org/10.1017/s0022278x22000210>.

⁸⁷ Gillies, *Crude Intentions: How Oil Corruption Contaminates the World*.

⁸⁸ Alexandra Gillies and Tom Shipley. "Anticorruption Guidance for Partners of State-Owned Enterprises" Natural Resource Governance Institute. (January 2022). <https://resourcegovernance.org/analysis-tools/publications/anticorruption-guidance-partners-state-owned-enterprises>

⁸⁹ Ibid.

and Nigeria, SOEs are central to the natural resource corruption schemes described.

STRATEGIC CORRUPTION

Securing access to natural resources can be a goal of strategic corruption.⁹⁰ In the Phase I report, the study team highlighted different issues to consider when applying the term, including clearly understanding the types of actors involved, their motivations, and the centrality of corruption to the processes. To date, the term has been applied in the natural resources sector to describe actions undertaken in the region by firms and groups linked to the PRC and Russian state.⁹¹ The likelihood of a country's natural resources sector being targeted for strategic corruption depends on the strategic importance of the resource as well as domestic vulnerabilities. The methods employed vary: RBLs premised on corruption, bribery of officials and elites, provision of illicit political finance, and exchanges of political and security assistance are all potential means for state-linked actors to secure access to natural resources.

In Madagascar, Russian interference in the 2018 presidential election campaign has been linked to securing access to a chromium mine. A company controlled by Yevgeny Prigozhin, the key representative for the Wagner Group and formerly a close ally of President Putin, established a joint venture in the run-up to the elections with the Malagasy state mining company, Kraomita Malagasy.⁹² Investigations undertaken by the Global Initiative Against Transnational Organized Crime published in February 2023 suggest this was part of a reciprocal arrangement of political support exchange for concession rights, exploiting the highly fragmented and contested political environment in Madagascar.⁹³

The PRC's role has loomed large over corruption in the trade of other natural resources in Madagascar, notably rosewood and illegal wildlife, but there is limited evidence of state direction. Chinese firms and buyers have had direct involvement in illegal logging, often forming corrupt partnerships with local elites following similar methods employed in other countries in the region,⁹⁴ but the experts consulted suggest this is largely a private entrepreneurial activity. Similarly, while the PRC is the key consumer market for the wildlife trade, one expert on the trade said the state has sought to distance itself from this activity.

Chinese entrepreneurs have extensive activities in natural resources sectors in Nigeria, although again there is limited evidence to suggest overall state direction. A 2018 briefing published by the United States Institute of Peace sets out the PRC's strategic interests in Nigeria which include securing trade and market access, access to energy, security of nationals and investments, and diplomatic support.⁹⁵ Chinese entrepreneurs have previously been connected to mining operations for lead, zinc, and tin in the Middle Belt (Plateau state) and most recently the gold mining in Northwest Nigeria (Zamfara state).⁹⁶ This activity is intertwined with organized criminality in the region and Zamfara state Chinese

⁹⁰ USAID. "Anti-Corruption Policy"

⁹¹ Philip, Zelikow, et al. "The Rise of Strategic Corruption: How States Weaponize Graft." *Foreign Affairs*, June 9, 2020.

⁹² Stanyard, et al. *The Grey Zone: Russia's Military, Mercenary and Criminal Engagement in Africa*. p.63

⁹³ Ibid

⁹⁴ TRAFFIC. "Timber Island: The Rosewood and Ebony Trade of Madagascar"

⁹⁵ Matthew Page. "The Intersection of China's Commercial Interests and Nigeria's Conflict Landscape."

⁹⁶ Ibid.

investors have been accused of paying off militant groups to secure access to sites.⁹⁷ The existing evidence, however, points to private entrepreneurial activity as the primary motivation.

It should be noted that some Nigerian respondents were equally prepared to use the term strategic corruption to describe the activities of Western firms in the oil and gas sector. The Oil Prospecting License 245 scandal, whereby two multinational oil and gas firms (Shell and ENI) allegedly paid bribes to secure a lucrative oil and gas concession, was cited by several respondents as an example. The perception was that Western governments have failed to take law enforcement action because it is in their economic and political interests to maintain positive relationships with successive Nigerian political administrations.

RESEARCH QUESTION 1A: HOW DO THESE FORMS OF CORRUPTION AFFECT GOVERNANCE, ECONOMIC, AND/OR SOCIAL OUTCOMES?

TASCK in the natural resource sector can be linked to a range of social, environmental, governance, and economic harms, and there is extensive literature that chronicles these issues in sub-Saharan Africa.

GOVERNANCE

To begin, natural resource corruption contributes to instability and conflict. For example, in South Sudan, misappropriated funds from the national oil company were funneled to local militia groups exerting violence against civilians.⁹⁸ Civilians may be victimized in the competition for natural resources among armed groups, as well as in clashes between the state and violent actors.⁹⁹ The research found that in some cases, illicit actors involved in smuggling legitimize themselves by becoming service providers, stepping in to provide basic services to local communities where the state is unable to provide such services.¹⁰⁰ This undermines formal governance structures and rule of law while fostering a sense of acceptance of illicit activities.

ECONOMIC

Although it is difficult to unravel the full scale of linkages between various illicit actors and corruption in the sector, undoubtedly “corruption plays a role as an enabler/facilitator in the access and trade of natural resources and that it enables criminal groups to launder the proceeds of illicit trade.”¹⁰¹

⁹⁷ Richard Assheton. “Chinese bribed Nigerian militants for access to vast mineral reserves.” *The Times.*, April 2023. <https://www.thetimes.co.uk/article/chinese-bribed-nigerian-militants-for-access-to-vast-mineral-reserves-wlghq7d2j>

⁹⁸ Alexandra Gillies, *Crude Intentions: How Oil Corruption Contaminates the World.*

⁹⁹ Resimić, Miloš. “Illicit Gold Flows From Central And East Africa: Main Typologies, Actors, And Associated Harms.” U4. (August 2021); 16-17 <https://knowledgehub.transparency.org/helpdesk/illicit-gold-flows-from-central-and-east-africa-main-typologies-actors-and-associated-harms#:~:text=The%20main%20actors%20involved%20in,of%20the%20rule%20of%20law,;Alex%20de%20Waal%20%20When%20Kleptocracy%20Becomes%20Insolvent%20Brute%20Causes%20of%20the%20Civil%20War%20in%20South%20Sudan.> African Affairs 113, no. 452 (2014): p 361. <https://doi.org/10.1093/afraf/adu028>.

¹⁰⁰ Resimić, Miloš. “Illicit Gold Flows From Central And East Africa: Main Typologies, Actors, And Associated Harms.” U4. (August 2021); 16-17 <https://knowledgehub.transparency.org/helpdesk/illicit-gold-flows-from-central-and-east-africa-main-typologies-actors-and-associated-harms#:~:text=The%20main%20actors%20involved%20in,of%20the%20rule%20of%20law.>

¹⁰¹ Østensen and Stridsman. “Shadow Value Chains Tracing the link between corruption, illicit activity and lootable natural resources from West Africa” p. 10

Commodity smuggling has a range of economic and governance implications, including money laundering and the circumvention of law enforcement and sectoral regulations. Research from the U4 Anti-Corruption Resource Center notes the use of commodities to facilitate illicit cross-border trades and how international customers evade bank regulations preventing purchases from sanctioned gold sources through cash transactions.¹⁰²

Respondents discussed how corruption leads to lost revenues; resources that could be going directly to the state and local communities for development are instead siphoned into the pockets of corruption actors. In Mozambique, for example, it is estimated that tens of millions in tax revenue are lost each year in illicit timber trading.¹⁰³ Local communities are supposed to receive 20 percent of revenues from exploration taxes, meaning communities impacted by the timber trade do not receive the full monetary compensation they are entitled to. One respondent noted that corruption in this space reduces community ownership of natural resources, hindering their ability to benefit from the legal trade of these resources. The loss of tax revenue directly impacts the ability of governments to fund public services.

Another respondent noted that another economic implication of the licit and illicit natural resource trade is that foreign companies may import labor from their countries of origin, disrupting local economic systems. The economic implications of corruption in Nigerian oil subsidies were mentioned by multiple respondents, noting that oil subsidies are fraught with corruption and represent a large portion of annual governmental expenditures. As one respondent stated, “The cost of ineffective expenditures for oil and gas subsidies... is enormous and drains public budgets.”

SOCIAL

A widely discussed theme throughout the literature review and stakeholder interviews was how political elites benefit from corruption in the natural resource sector. Aside from simply profiting off illicit flows or leveraging their position for political gains, in reform and regulatory processes, elites may manipulate “conditions to attain exclusive benefits to individuals or groups at the cost of social benefits.”¹⁰⁴ Similarly, they may issue preferential contracts or licensing agreements. These actions perpetrate clientelist systems, facilitate the involvement of unethical and unqualified actors, and inhibit true reform in the sector.

By hindering effective regulation and natural resource governance, corruption facilitates other social impacts that are readily observable in the natural resource sector. For example, research highlights the prevalence of exploitation of laborers in the extractives sector, particularly of vulnerable groups such as children, women, and migrants.¹⁰⁵ This may include inhumane working conditions, sexual or physical assault, or employment of persons who may not understand they are involved in illegal mining activities.

¹⁰² Miloš. “Illicit Gold Flows From Central And East Africa: Main Typologies, Actors, And Associated Harms.” 16-17

¹⁰³ Environmental Investigation Agency. “First Class Connections: Log Smuggling, Illegal Logging, and Corruption in Mozambique.” (February 2013). <https://eia-international.org/report/first-class-connections/> page 6

¹⁰⁴ Williams. *Corruption, Natural Resources and Development*.

¹⁰⁵ Miloš. “Illicit Gold Flows From Central And East Africa: Main Typologies, Actors, And Associated Harms.” 16-17; Natural Resource Governance Institute. “Preventing Corruption in Energy Transition Mineral Supply Chains,”

As discussed above, corruption facilitates regulatory gaps and the involvement of illicit, unethical, or unqualified actors; these conditions contribute to an environment where exploitation is unchecked.

ENVIRONMENTAL

Furthermore, a large body of research shows that trafficking in natural resources is resulting in the exploitation of endangered species. This may eventually lead to increased endangerment/extinction of species. There is environmental degradation that comes with a lack of regulations around mining sites, for example, in the Republic of the Congo, “gold mining is considered to be the main source of pollution of water and fish.”¹⁰⁶ Mercury and cyanide pollution, increased flooding, and destruction of wildlife can all be linked to the extractives sector and exacerbated by corruption in this space.

RESEARCH QUESTION 2: HOW, IF AT ALL, ARE USAID AND OTHER ACTORS ADDRESSING TASK WITHIN THE NATURAL RESOURCES SECTOR?

Many bilateral and multilateral development agencies including USAID have programming related to natural resource governance in sub-Saharan Africa. Approaches vary as to whether these programs explicitly target corruption issues or if this is an indirect objective. Most programming is organized at the national level, although as this section will show, there are a limited number of programs that have started to purposefully target transnational dimensions to the problem. Addressing TASCK in the natural resources sector requires engaging with a range of actors including national governments (in particular, sectoral regulatory bodies), civil society and media organizations, and the private sector. Political economy analysis should influence what strategy is appropriate and whom are the right actors to work with to have the most resilient impact in addressing corruption in the sector (See section research question 3 below for more discussion).

This section summarizes examples of existing initiatives supported by development agencies that have relevance to TASCK. The categorization shown in **Table 7** is based on the USAID Guide to Countering Corruption Across Sectors with further detail provided on each approach in the sections which follow.¹⁰⁷ The examples are highlighted because they help to illustrate a programmatic approach to the problem; this is not intended as an exhaustive list.

Table 7: Categories of Natural Resource Programming

APPROACH	EXAMPLES OF ACTIVITIES	EXAMPLES OF PROGRAMS
Transparency and awareness raising	<ul style="list-style-type: none"> • Disclosure of sectoral data (licenses, revenues, beneficial ownership). • Access to information rights and laws. 	<ul style="list-style-type: none"> • Extractive Industries Transparency Initiative, funded by multiple donors. • Fisheries Transparency Initiative, funded by Foundations, Irish Aid and GIZ. • Transparency in the cobalt value chain, funded by Swedish International Development Cooperation Agency. • East and Southern Africa Forest Observatory, funded by European Union (EU).

¹⁰⁶Ibid.

¹⁰⁷ USAID. “Guide to Countering Corruption Across Sectors.”

APPROACH	EXAMPLES OF ACTIVITIES	EXAMPLES OF PROGRAMS
Social and institutional accountability	<ul style="list-style-type: none"> Support to sectoral oversight bodies. Support to civil society groups for advocacy, investigation, research, and monitoring activities. 	<ul style="list-style-type: none"> TI Accountable Mining Program, funded by the Department of Foreign Affairs and Trade and BHP Foundation. Reajir program to support investigative journalists, funded by USAID. Promoting domestic resource mobilization in sub-Saharan Africa, funded by Swedish International Development Cooperation Agency. TRACES program in Senegal, funded by USAID.
Prevention	<ul style="list-style-type: none"> Risk assessment and anti-corruption controls at key agencies. Collective action initiatives in the private sector. Due diligence and traceability. 	<ul style="list-style-type: none"> Capacity development at mining agencies, funded by GIZ, World Bank Facility for Oil Sector Transparency and Reform in Nigeria, funded by FCDO. International Tin Supply Chain Initiative (ITSCI)
Detection	<ul style="list-style-type: none"> Monitoring of financial transactions, including cross-border financial flows. Auditing. Whistleblowing and complaints mechanisms. Capacity-building and use of technology at pinch points (e.g., airports, seaports, borders, and customs agencies). 	<ul style="list-style-type: none"> Targeting Natural Resource Corruption (TNRC), funded by USAID. Transparency International Advocacy and Legal Advice Centers, funded by multiple donors.
Response	<ul style="list-style-type: none"> 'Follow-the-money' approaches for financial investigation. Capacity-building at law enforcement agencies and judicial authorities. Strengthening cross-jurisdictional cooperation between enforcement agencies. 	<ul style="list-style-type: none"> Basel Institute Green Corruption, funded by multiple donors. Civil Forum for Asset Recovery (CiFAR). Wildlife agency capacity-building, funded by UNODC.

TRANSPARENCY AND AWARENESS RAISING

Development agencies have promoted transparency as a basis for addressing corruption in the sector. The approach is premised on the assumptions that improved availability of information may deter corrupt actors, or at the least make corrupt transactions harder to execute, while data availability can support the detection and response to issues.

DISCLOSURE OF SECTORAL DATA

The Extractive Industries Transparency Initiative (EITI) covering oil, gas, and mineral resources is the best-known initiative advancing the availability of sectoral data. The EITI counts 28 member countries in sub-Saharan Africa, including the two case study countries, and has substantially improved the availability of financial data on government revenue flows and project-level finances. There have been recent moves within the EITI to address corruption more explicitly. The latest EITI standard (released June 2023)

requires firms (including state-owned enterprises) to publicly disclose anti-corruption policies and national multi-stakeholder groups are for the first time required to consider corruption cases and risks.¹⁰⁸ Firms have been required to disclose beneficial ownership information since January 2020, while the EITI's Opening Extractives program provides direct support to national stakeholders on the use of beneficial ownership information. Five countries in the region are included in the current program: Ghana, Liberia, Nigeria, Senegal, and Zambia.

The EITI inspired the Fisheries Transparency Initiative. The latter requires public disclosure of data on stocks, access agreements, and firm beneficial ownership among other criteria.¹⁰⁹ Open sectoral data for resources however is comparatively under-developed. GIZ has supported some research on open land data but finds sub-Saharan Africa to be a region with persistent opacity around land ownership.¹¹⁰ Although some countries have begun to replicate the EITI methodology in forestry, there has not been the same uptake in this sub-sector.

An alternative approach is to improve the transparency of information for a resource across the international value chain. Resource Matters' work to map actors in the cobalt supply chain is an example with a particular focus on the Democratic Republic of Congo given its centrality to the global trade.¹¹¹ Although investigative work often reveals networks of actors involved, there does not appear to have been comparable systematic mapping of value chains for other forms of natural resources.

ACCESS TO INFORMATION

Regarding the forms of TASCK highlighted in the region for research question 1, two forms of transparency interventions stand out as under-emphasized in existing development programming. Contract transparency has lagged significantly behind work on revenue and payments transparency. Research produced by NRGi finds only five countries in the region have good contract disclosure practices.¹¹² Lack of information on contract terms increases vulnerability to TASCK in revenue collection and further impedes monitoring of contracts. Organizations like the Environmental Investigation Agency have advocated for public registers of interests for officials with responsibilities for natural resource management but have generated little momentum to date.¹¹³ For example, disclosure by relevant parliamentarians, officials at regulators, licensing authorities, and state-owned enterprises might provide an alternative source to corroborate beneficial ownership data.

¹⁰⁸ "EITI Standard 2023." EITI, June 2023. <https://eiti.org/collections/eiti-standard>

¹⁰⁹ "FITI Standard."

¹¹⁰ GIZ. "The Role of Open Data in Fighting Land Corruption." (2021)

https://www.giz.de/de/downloads/giz2021_en_TheRoleOfOpenDataToFightAgainstLandCorruption.pdf

¹¹¹ "Cobalt Supply Chain BETA." Resource Matters. Accessed June 2023. <https://supplychains.resourcematters.org/explore>

¹¹² Robert Pitman and Aubrey Menard. "Unfinished Business: Contract Transparency In The Extractive Industries Transparency Initiative." Natural Resource Governance Institute. (2023).

<https://resourcegovernance.org/sites/default/files/documents/unfinished-business-contract-transparency-in-the-eiti.pdf>, p. 12

¹¹³ Environmental Investigation Agency. "Rotten to the Core How to tackle the corrupt networks facilitating wildlife and forest crime." (June 2021). <https://eia-international.org/report/rotten-to-the-core-how-to-tackle-the-corrupt-networks-facilitating-wildlife-and-forest-crime/>

Despite the emergence of programs aiming to improve data utilization, several respondents emphasized that a persistent challenge with transparency work is the lack of evidence that it has supported behavioral change on corruption in the sector.

SOCIAL AND INSTITUTIONAL ACCOUNTABILITY

As previously mentioned in the elections and political processes findings section above, the USAID Guide to Countering Corruption across Sectors distinguishes between activities aimed at strengthening the accountability of government oversight bodies and external accountability measures, such as support to the media and civil society.¹¹⁴ Existing donor portfolios on natural resources tend to prioritize support to external accountability actors.

SUPPORT TO CIVIL SOCIETY

Some programs have focused on developing the capacity of journalists to investigate corruption. A current example is USAID's *Reajir* program in Mozambique (2021 – 2024) which specifically focuses on natural resources. The program funds the development of a network of Mozambican investigative journalists working on issues related to natural resource management. Transnational elements include supporting Mozambican journalists to attend international conferences and a goal of convening an international investigative journalist conference in Maputo.¹¹⁵

Other relevant examples include donor support to the OCCRP, whose reporting on sub-Saharan Africa has a strong emphasis on natural resources corruption in the region, including exposure to transnational links. One expert noted that a consequence of TASCK is that mainstream media organizations are often corrupted, necessitating new means of organization and dissemination of findings. The development of international collaborative networks of journalists and the use of social media for dissemination are promising approaches that might be supported to overcome this challenge.

Various donors have supported CSOs across the region to undertake advocacy and research activities related to natural resources. Most programming has a domestic orientation but can have relevance for countering TASCK. Transparency International's Accountable Mining Program is notable for its decision to focus on a distinct area of the value chain: the award of mining permits, licenses, and contracts. The program supported 18 TI chapters (50 percent in sub-Saharan Africa including Madagascar) to undertake corruption risk assessments and advocacy on licensing. An evaluation concluded that focusing on a specific area had helped chapters demonstrate expertise among stakeholders, while network development and lesson sharing across jurisdictions were strengths of the program.¹¹⁶ TI has similar multi-country programs in the region working on land and deforestation although these have broad-ranging objectives.

Notwithstanding the examples highlighted, several experts consulted felt that lack of attention to the transnational dimensions of corruption is a weakness in many existing civil society programs. A Nigerian

¹¹⁴ United States Agency for International Development. "Guide to Countering Corruption Across Sectors."

¹¹⁵ United States Agency for International Development. "Strengthened Investigative Journalism In Natural Resources Management And Other Economic Governance Issues." (2021). https://www.usaid.gov/sites/default/files/2022-05/REAJIR_December_2021.pdf

¹¹⁶ Eva Kirch and Lutz Neumann. "Transparency International (TI) Evaluation of the Accountable Mining Programme (AMP)." Transparency International. (June 2021). https://files.transparencycdn.org/images/TI AMP_Evaluation2021_Report.pdf

civil society lead stressed that groups need more technical support and knowledge sharing across countries to contribute to this work, while another civil society activist mentioned that groups would benefit from training on U.S. anti-corruption legislation to help assess applicability in the domestic context. National CSOs require support in pursuing strategic litigation in external jurisdictions; a tactic employed by TI Madagascar. Although support to civil society was perceived as the most viable route for support in kleptocratic contexts, there was recognition that a “heavy lift” from funders is needed to have a “sustained impact.”

SUPPORT TO LEGISLATIVE BODIES

Donors appear to have only rarely supported programs in the sector with oversight institutions such as parliaments. A four-year USAID-funded program initiated in Senegal in September 2022 is one exception. The TRACES program incorporates capacity-building with the Senegalese parliament on the management of extractive revenues alongside work with civil society on information use.¹¹⁷ The program has some similarities to an FCDO (then Department for International Development [DFID]) funded program that worked with various institutions including a parliamentary commission in the oil and gas sector in Ghana (2014-2020).¹¹⁸ This was similarly framed in terms of improving sectoral governance and management of resource revenues. This is not likely to be a viable or desirable approach in kleptocracies without an independent legislature.

PREVENTION

Preventative measures are understood here to cover due diligence and anti-corruption controls in the private sector as well as institutional strengthening at relevant state agencies.

DUE DILIGENCE AND TRACEABILITY

In the former group, due diligence and traceability schemes in mining are the most developed area of programming. Previous research undertaken by USAID on the state of innovation in countering transnational corruption outlines multiple supply chain due diligence schemes.¹¹⁹ The Great Lakes sub-region has been a testing ground for these initiatives with one of the best-known schemes, the ITSCI.¹²⁰ Due diligence has commonly been combined with traceability technology to allow actors across the supply chain to track the origin of minerals. Traceability schemes have been undertaken for timber and wildlife products in several countries in sub-Saharan Africa with mixed results. A lack of political buy-in has often affected how well these schemes have been able to operate despite advances in technology.¹²¹

¹¹⁷ Natural Resource Governance Institute. “USAID Support Promotes Transparency and Accountability in Senegal’s Extractive Industries.” (2022). <https://resourcegovernance.org/news/usaidsupport-promotes-transparency-and-accountability-senegal-extractive-industries>

¹¹⁸ “Ghana Oil and Gas for Inclusive Growth,” FCDO, Last Modified August 2022. <https://devtracker.fcdo.gov.uk/projects/GB-I-204330/documents>

¹¹⁹ Mitchell Watkins. “Countering Transnational Corruption State Of Innovation Analysis.” USAID. (2022). <https://www.usaid.gov/sites/default/files/2023-01/Countering%20Transnational%20Corruption%20State%20of%20Innovation%20Analysis.pdf>

¹²⁰ “Understand ITSCI.” ITSCI. <https://www.itsci.org/>

¹²¹ Constant Momballa-Mbun et al. “An overview of the timber traceability systems in the Congo Basin countries.” TRAFFIC. (2023). https://www.traffic.org/site/assets/files/20862/traffic-report-overview_of_timber_traceability_-_20230203.pdf

The study team canvassed opinions from select experts on how well these schemes have fared in countering TASCK. Part of the challenge appears to stem from the fact that these schemes were designed to address the problem of conflict minerals and human rights abuses with less attention to corruption. An expert at the State Department noted that there is often an incorrect assumption that “traceability is a proxy for due diligence.” They continued, “Due diligence is asking the what – how was this mined and what did the supply chain look like? Traceability is about the who – where did these things come from and who was involved... one doesn’t work that well without the other.”

THE ROLE OF INTERNATIONAL FIRMS IN TASCK

With attention focused on site-level human rights concerns, questions about how international firms obtained and negotiated concessions as well as their ownership and political connections can be overlooked. International firms with significant integrity issues hanging over their records have received certification. One implementer stressed that due diligence and traceability schemes are “typically geographically narrow” and do not take account of the wider institutional context where the prevalence of kleptocracy is a root cause of site-level abuses. An expert group has recently published a set of recommendations on preventing corruption in energy transition mineral supply chains that encompass a stronger focus on corruption risks at an early stage of project development.¹ As an avenue for reducing corruption issues around SOEs, NRGI has developed guidance targeted at international firms including commodity traders. This expands the expectations on private sector actors to prevent corruption in these relationships, such as by reducing agent use, assessing conflicts of interest around PEPs, and avoiding high-risk financial transactions.²

¹ Natural Resource Governance Institute. “Preventing Corruption in Energy Transition Mineral Supply Chains.” https://resourcegovernance.org/sites/default/files/documents/preventing_corruption_in_energy_transition_mineral_supply_chains.pdf

² Gillies and Shipley. “Anticorruption Guidance for Partners of State-Owned Enterprises”

BROADER GOVERNANCE REFORMS

On preventative measures with sectoral government bodies, it is more common for donors to support broader governance reforms on natural resource management which present an indirect route for targeting corruption. For example, GIZ and the World Bank provide institutional support in the mining and energy sectors ranging from a legal framework on a sectoral strategy development to direct capacity-building with key agencies, such as tax authorities and regulators.¹²² Transnational dimensions are occasionally emphasized in these programs. A recently concluded GIZ program in West Africa for instance focused on preventing tax avoidance by international firms as well as export monitoring to prevent regional smuggling.¹²³ A previous iteration of the same program provided support to licensing authorities to conduct integrity due diligence on international firms applying for concessions. As the Madagascar and Nigeria case studies show, political conditions place

¹²² GIZ. “Resource governance Strengthening good governance in the extractive sector.”

<https://www.giz.de/expertise/downloads/giz-en-leistungsangebot-rohstoffgovernance.pdf>

¹²³ GIZ. “Regional Resource Governance in West Africa.” (2022). <https://www.giz.de/en/worldwide/15792.html>

limits on the scope and effectiveness of these schemes which can at times be disconnected from the broader institutional context.

DETECTION

Monitoring of financial transactions, auditing, and support to whistleblowers are types of detection that feature in several natural resource programs in the region.

MONITORING OF FINANCIAL TRANSACTIONS

Experts highlighted that work on detection in the illegal wildlife trade is the most advanced. The TNRC has noted good engagement from the financial sector in using financial intelligence to detect money laundering connected to the illegal wildlife trade.¹²⁴ In Madagascar, there have been efforts to connect this work to capacity-building with the national financial intelligence unit. There has not however been comparable engagement on TASCK related to other forms of natural resources. There is an open question as to how successful initiatives have been in engaging local and regional banks, which play important downstream roles in laundering schemes.¹²⁵

AUDITING

The preventative programs described above for minerals rely on sound auditing. Gaps have sometimes been apparent however where auditors specialize in human rights issues and do not have skills in detecting corruption in the supply chain, as one expert noted. Some schemes have been exposed to their own integrity issues. ITSCI has come under substantial criticism for failing to detect flows of illicit minerals into the international supply chain, a problem made possible by corruption at government agencies responsible for monitoring.¹²⁶ Separately, support for audit institutions is a common component of public financial management programs funded by donors in the region. The elections and political processes section highlighted initiatives aiming to expand this work to political finance (See Findings: Elections and Political Processes section above). Dedicated support to audit institutions to detect natural resource corruption appears to be an under-explored form of programming.

WHISTLEBLOWING AND COMPLAINTS MECHANISMS

Several natural resources programs in the region have incorporated activities related to whistleblowing and complaints mechanisms. TI has sought to orientate Advocacy and Legal Advice Centers – a long-standing form of support for whistleblowers – to support deforestation programs in the region.¹²⁷ This is a feature of TI’s land and corruption program for the region.¹²⁸ Regarding TASCK, challenges facing this form of programming include reprisals by kleptocratic networks against complainants and bias in

¹²⁴ “TNRC eCourse.” World Wildlife Fund. <https://www.worldwildlife.org/pages/tnrc-ecourse-engaging-the-financial-sector-to-reduce-money-laundering-and-corruption-linked-to-wildlife-trade>

¹²⁵ T. Prelec and, R.S. de Oliveira, “Enabling African loots: tracking the laundering of Nigerian kleptocrats’ ill-gotten gains in Western financial centres” *Journal of International Relations and Development* (2023). <https://doi.org/10.1057/s41268-023-00292-4>

¹²⁶ Global Witness. “The ITSCI laundromat.” (2022). <https://www.globalwitness.org/en/campaigns/natural-resource-governance/itsci-laundromat/>

¹²⁷ UNFCC. “Final evaluation of the “REDD+ Governance and Finance Integrity for Africa” programme.” (2018). <https://files.transparencycdn.org/images/REDD-Governance-and-Finance-Integrity-for-Africa.pdf>

¹²⁸ Transparency International. “Land Corruption In Sub-Saharan Africa” (2016). <https://www.transparency.org/en/projects/land-corruption-sub-saharan-africa>

formal judicial processes which prevents fair adjudication. The Madagascar case study includes a discussion of local responses to these types of mechanisms in conservation work.

RESPONSE

CAPACITY BUILDING OF LAW ENFORCEMENT AND JUDICIAL AUTHORITIES

Donor programming in the region has frequently focused on the response to corruption, supporting law enforcement agencies and judicial authorities to sanction those involved in natural resource corruption. The UNODC's work in the region on wildlife crime provides an example. It has partnered with wildlife agencies across the region on both preventative and enforcement activities. In the latter area, activities have included supporting improved coordination between agencies involved in the investigation and prosecution of cases, conducting training on money laundering typologies, and facilitating cooperation between enforcement agencies located across jurisdictions.¹²⁹ These activities can sometimes be hampered by gaps in mutual legal assistance frameworks between countries as well as political spoilers at different points in the value chain.

FOLLOW-THE-MONEY APPROACHES

"Follow-the-money" approaches are gaining traction in the natural resources sector. The Basel Institute's Green Corruption program is highlighted because of its attention to the transnational elements of natural resource corruption. Activities in sub-Saharan Africa have to date encompassed illegal wildlife and fisheries in Madagascar, Malawi, and Uganda. The work emphasizes engagement with financial institutions to improve information sharing and launch proactive investigations against high-level offenders.¹³⁰ To date, there does not appear to have been the same interest in the application of these methods in other natural resource value chains.

The Basel Institute has advocated for an increase in the use of non-conviction-based forfeiture measures for environmental crimes, for instance by using civil forfeiture schemes or unexplained wealth orders.¹³¹ These might act as a complement to asset recovery work in the region which has frequently focused on illicit wealth derived from natural resources.

STRENGTHENING CROSS-JURISDICTIONAL COOPERATION

Respondents in Nigeria mentioned the CRIMJUST project, funded by the EU, State/INL, and the government of Portugal, which has been supporting selected countries along supply chains of illicitly trafficked commodities. In Nigeria, CSO-led institutional assessments in part addressed state capture and political interference in law enforcement. The project has triggered important Nigerian Police accountability reforms. Interestingly, according to a Nigerian civil society respondent, the program

¹²⁹ UNODC. "Scaling back corruption: a guide on addressing corruption for wildlife management authorities." (2019). https://sherloc.unodc.org/cld/en/bibliography/2019/scaling_back_corruption_a_guide_on_addressing_corruption_for_wildlife_management_authorities.html

¹³⁰ Basel Institute on Governance. "Illicit Financial Flows." <https://baselgovernance.org/sites/default/files/2023-01/IFFs%20synthesis.pdf>

¹³¹ Jonathan Spicer and Juhani Grossmann. "Targeting Profit: Non-Conviction Based Forfeiture in Environmental Crime." *Basel Institute on Governance*. (January 2022). <https://www.worldwildlife.org/ages/tnrc-introductory-overview-targeting-profit-non-conviction-based-forfeiture-in-environmental-crime>

enabled multi-country, peer-learning CSO monitoring and advocacy in the typically CSO- and development partners-restricted security arena.

CONCLUSIONS

Based on the findings, the research team was able to draw several conclusions related to: 1) manifestations of TASCK in the elections and political processes and natural resources sectors; 2) political, economic, social, environmental, and other consequences of TASCK; and 3) lessons learned from current efforts to address TASCK.

MANIFESTATIONS OF TASCK

The research highlighted manifestations of TASCK unique to the elections and political process sector. Examined against the phases of the electoral cycle, these include:

- **Pre-electoral period:** Use of illicit finance during party and candidate primaries; opaque contracts for the procurement of elections equipment; and illicit finance to fund intimidation tactics against candidates and voters.
- **Electoral period:** Illicit finance employed for vote buying; subversive political interference by international firms hired for consultancies; and international supply of technology for EMBs; surveillance of opposition candidates and civil society.
- **Post-election:** Quid pro quo deals between international entities and elected politicians and capture of the judiciary by political elites that prevents fair contestation of election results in courts.

The natural resources sector also experiences vulnerabilities to TASCK in several key areas, including:

- **Securing access to natural resources:** Gaining access to natural resources via bribery or partnerships with politically connected firms with conflicts of interest.
- **Operations:** Use of bribery or improper influence to prevent enforcement of rules governing direct extraction of resources, transportation, financing, processing, and purchasing.
- **State revenue collection:** Undue influence over the making of laws and regulations and their enforcement; bribery or favoritism to influence contract terms; corruption in state commodity sales; and illegal taxation in fragile and conflict-affected settings.
- **State revenue management:** Embezzlement of funds into international assets; limited oversight and transparency in sovereign wealth funds and savings and investment funds.
- **SOEs:** Bribery or improper influence by international firms to secure access to business opportunities, or auditors turning a blind eye to embezzlement of SOE funds.

A few cross-sectoral themes underpin the TASCK schemes highlighted above. First, illicit forms of finance are a key enabler of political corruption and an important link between the natural resource and elections and political processes sectors. Specifically, when natural resources are illegally exported, the

profits can be recycled back into elections via asset laundering for use in vote-buying, funding primaries, etc. In addition, the state capture tactics seen in elections and political processes help perpetuate TASCK in natural resources. Elites who have gained control of key institutions can then ensure continued exploitation of natural resources. The two sectors combine in the cases of strategic corruption discussed above. There are instances in which foreign states and state-linked actors have sought to corruptly intervene in election processes as a means of securing access to natural resources.

NATURAL RESOURCES CONSEQUENCES OF TASCK

The research found a variety of consequences of TASCK across the elections and political processes and natural resources sectors, including:

- **Governance:** Excludes a broader cross-section of politicians and public officials, including women and those outside of the elite; and undermines public confidence in government systems and institutions.
- **Economic:** Leads to significant revenue losses that could be going to the state and local communities for development.
- **Social:** Contributes to conflict cycles when the proceeds of corruption are used to fund armed conflict; civilians can be victimized by election intimidation tactics or in the competition for natural resource access; exploitation of laborers, either via inhumane working conditions, sexual or physical assault, or employment of persons who may not understand they are involved in illegal activities; and erosion of community ownership of and connection to natural resources.
- **Environmental:** Lack of regulation means that natural resources are often exploited to the point of environmental degradation and species endangerment.

CURRENT EFFORTS TO ADDRESS TASCK

While it is rare for programming to explicitly address TASCK, in both the elections and political processes and natural resources sectors, USAID and other actors are undertaking initiatives which are indirectly relevant to countering these issues. These are grouped in the report according to the USAID Guide on Countering Corruption Across Sectors and cover the following five categories:

- **Transparency:** Supporting actors, particularly CSOs and journalists, which work to increase the amount of information available (e.g., Alliance for Finance Monitoring, EITI); harnessing digital tools such as social media or search engines for information gathering; and advocating for asset and income disclosure requirements among politicians.
- **Social and institutional accountability:** Aiding external accountability actors such as CSOs and journalists who investigate issues of institutional corruption, particularly in the natural resources sector; there are examples of work to support electoral oversight institutions in both sectors, but this had rarely been directly to countering TASCK.
- **Prevention:** Examples from across the two sectors include voter education and information campaigns; capacity building with political parties and candidates that incorporate elements

focused on trust in politics; early warning mechanisms for conflicts related to elections; due diligence and traceability schemes; and support for governance reforms.

- **Detection:** Direct support to audit institutions; multilateral initiatives to detect corruption, such as the UNCACF peer preview process; monitoring of financial transactions; and aiding whistleblowers.
- **Response:** Capacity building or other direct support for law enforcement and judicial authorities; supporting actors such as CSOs who work on countering misinformation or “follow the money” projects; funding initiatives that allow for multi-country responses (e.g., to repatriate stolen assets or detect corruption along cross-jurisdictional supply chains); and instituting sanctions.

A few key lessons can be drawn from these approaches. First, the initiatives undertaken in both the elections and political processes and natural resources sectors underline the importance of strengthening civil society, which plays a critical watchdog role. Second, given that TASCK is inherently a transnational issue, projects that encourage cross-jurisdictional cooperation can be particularly effective, although these have been under-emphasized to date. In addition, there are some important gaps in existing programming (e.g., engaging private sector enabling professions such as banks and lawyers, emphasizing contract transparency as well as revenue transparency, integration of corruption indicators in early warning mechanisms, etc.). Finally, the research underscored that in many jurisdictions in the region it will be necessary to examine the elections and political processes and natural resources sectors together when thinking about solutions to TASCK.

The research team used the conclusions highlighted above to determine recommended entry points for addressing TASCK in both the elections and political processes and natural resources sectors. These are outlined in the following section.

RESEARCH QUESTION 3: KEY CONSIDERATIONS AND ENTRY POINTS FOR PROGRAMMING

CROSS-CUTTING CONSIDERATIONS

Designing programming for TASCK raises significant operational, strategic, and ethical questions for USAID. The following sections contain key considerations for any activity in this area before outlining potential entry points for programming in the two thematic areas of focus: 1) elections and political processes, and 2) natural resources.

LOOKING BEYOND COUNTRY-LEVEL PROGRAMMING

Responding to the forms of corruption comprising TASCK presents a distinct challenge for USAID as it tests the boundaries of the organization’s mandate. By definition, these forms of corruption can only be countered through a transnational response that combines measures in sub-Saharan Africa with reforms in other connected jurisdictions. Developed countries facilitate illicit finance, are an end-destination for this finance, or house international firms engaged in corrupt schemes. There are nonetheless legal restrictions that confine USAID spending to developing countries and therefore prevent the agency from directly undertaking relevant activities in developed counties, including the U.S. This does not

preclude USAID from playing an important role in international initiatives and working with other USG agencies. It however requires careful consideration of the distinct contribution that USAID as a development agency can make as part of a network of actors concerned about these issues.

This is a challenge with which other development agencies are grappling. What was then DFID's (now FCDO) Global Anti-Corruption Program, represents a more radical reorientation. This saw development funding provided to UK domestic law enforcement agencies to work on transnational cases, which represents a more radical reorientation.¹³² Other agencies have more closely stuck to limiting funding to developing countries but added a more expansive international role. As with some of the programming approaches outlined (see section addressing research question 2 in both sectors' Findings sections), this has included initiatives to strengthen collaboration between African and international CSOs, journalists and law enforcement networks; developing and promoting international standards on issues such as beneficial ownership transparency; funding multi-jurisdictional research projects; and supporting intra-regional learning on specific issues.

In line with the “progress beyond programs mindset” set out in the USAID policy on anti-corruption, USAID should consider other routes available for influence on TASCK. For example, USAID can look to contribute to domestic reform debates in the United States by providing evidence on the harms of TASCK in the worst affected geographies. It can use its convening power to bring together groups working on these themes in the sectors affected and play a role in coordinating cross-agency approaches. As many of these corruption schemes are organized regionally, USAID should also prioritize programming which connects multiple country-level missions, recognizing that countries may play different roles in a given scheme.¹³³ USAID should explore how to connect programming across regions; for instance, this research has highlighted the importance of the Middle East to manifestations of TASCK in sub-Saharan Africa.

THINKING AND WORKING POLITICALLY

The USAID Anti-corruption Policy includes the commitment to strengthen and regularize political analysis as part of its efforts to address corruption.¹³⁴ The policy references USAID's guide on thinking and working politically, which calls for insights from political economy analysis (PEA) to be integrated into programming.¹³⁵ Thinking and working politically is especially critical for developing responses to the forms of corruption comprising TASCK. One implication is that political economy analysis should account for actors who may be geographically located outside of a country and yet still hold crucial roles in corruption schemes. Equally, PEA may allow USAID to identify champions inside and outside of a

¹³² As noted, there are legal restrictions in place on USAID which would prevent a similar funding model. “Twenty years of anti-corruption – A ten-part series.” U4. (2020). <https://www.u4.no/twenty-years-of-anti-corruption-series>

¹³³ An example would be the Madagascar case, where nearby countries have played important roles in natural resource corruption schemes. This includes corporate administration (Mauritius, Seychelles) and the re-export of products (Comoros, South Africa).

¹³⁴ USAID. “Anti-Corruption Policy.” p.25

¹³⁵ USAID Center of Excellence on Democracy, Human Rights and Governance. “Thinking and Working Politically Through Applied Political Economy Analysis.” (2018) <https://www.usaid.gov/sites/default/files/2022-05/PEA2018.pdf>

country who promote change. The discussion of strategic corruption shows the need to consider how geopolitical power dynamics might influence manifestations of corruption at the country level.

PEA should influence USAID’s strategy for regional anti-corruption programming, which should include the option of not directly engaging in corruption in countries where this is not feasible politically. Lessons from cases across the region further demonstrate that in kleptocracies development agencies should be extremely cautious about working with government institutions on corruption; non-state actors are more likely to be aligned with USAID goals. One anti-corruption specialist at a European development agency noted that misdiagnosis of the problem remains common, saying “Assessments assume that the problem with corruption is officials don’t have the knowledge and sufficient skills to combat corruption and if we just filled those gaps, the problem would go away... this misses entirely the politics and contextual environment which drive corruption.”

FIT-FOR-PURPOSE MONITORING, EVALUATION, AND LEARNING

Thinking and working politically implies a different approach to monitoring, evaluation, and learning (MEL), emphasizing “rapid cycles of learning and reflection throughout program implementation” in addition to more periodic, formal evaluation.¹³⁶ The Phase I report highlighted problems around the measurement of the different forms of corruption constituting TASCK which impede monitoring. Widely used indices of corruption do not sufficiently take into account the role of countries in transnational corruption schemes. There are not yet reliable measures on the development of kleptocracies, according to Phase I research. An additional finding is that even in a well-developed area of programming, such as natural resource governance, there are not high-quality evaluations from which to draw lessons.

TASCK as it affects the sub-Saharan Africa region is an intractable issue and progress will generally be difficult to observe in the timeframes in which programs typically unfold. In consequence, MEL will often be reliant on ongoing qualitative analysis and should support adaptive management of programs rather than simply tracking whether predefined indicators have been met. It additionally requires careful framing of objectives against which to assess impact rather than working toward an intangible goal of reducing TASCK. Following some of the types of activities discussed in the previous sections, programs might alternatively be organized around objectives, such as:

- Closing data and information gaps on TASCK.
- Closure of legal and regulatory loopholes which create vulnerabilities to TASCK.
- Improved regional implementation of international standards in areas such as beneficial ownership requirements, political finance regulations, natural resource revenue management, etc.
- Strengthened partnerships between international and national CSOs, journalists, and/or law enforcement agencies.

¹³⁶ Ibid.

Each of these types of objectives might come with indicators of progress. Implementers should be open to considering evaluation research designs based on generative logic (evaluations concerned with understanding the conditions needed for certain outcomes to be achieved). These are better suited to account for the uncertainty inherent to programming on TASCK than traditional MEL evaluations based on counterfactual logic.¹³⁷

LOCAL EXPERTISE

Some respondents strongly argued that local expertise, ownership, and long-term capacity-building are critical components of addressing TASCK objectives. TASCK programming depends strongly on highly contextual data and information. USAID standard frameworks such as the USAID's New Electoral Assessment Framework¹³⁸ can only work in tandem with strong local ownership and contextual application. Some respondents commented that the USAID-supplied uptake of technical capacity-building is prevented by the lack of understanding of the local political realities. Political economy analyses, baselines, and program and project designs are conducted across the programmatic sectors, but they rely on external expertise, are limited in the implementation timeline, and do not value sufficiently locally generated knowledge.

The themes of elections programming and natural resources imply strong resistance to change by kleptocratic networks, which can mobilize the entire public administration, international enablers, and others to resist and block the reforms. In *Lessons from Nigeria for Improved Thinking and Working Politically in the Extractives Sector* (2017), the authors argued that “local ownership rooted in staff with a combination of technical expertise, a deep knowledge of the local political context and excellent networking abilities” have all been important to the success of a project targeting Nigeria extractives sector reform.¹³⁹

CSO SAFETY AND SECURITY

A do-no-harm approach and development agency due diligence processes are essential for TASCK-related programming. This research has shown that local and international CSOs and NGOs are some of the most effective stakeholders in tackling global and national anti-corruption challenges including the elections and political processes sector and the natural resources sector. Local activists work at great personal risk, often in contexts where actors such as law enforcement, the justice system, media, and others are part of domestic and foreign kleptocratic networks.

Many stakeholders interviewed for this research argued that strict do-no-harm programming, physical protection, and diplomatic support are essential in addressing TASCK challenges. Some specific measures were suggested to help mitigate the risk of these threats:

¹³⁷ T Aston, C Roche., M Schaaf., and S Cant. Monitoring and evaluation for thinking and working politically. *Evaluation*, 28(1) (2022), 36–57. <https://doi.org/10.1177/13563890211053028>

¹³⁸ United States Agency for International Development. “Electoral Assessment Framework A Tool to Assess Needs, Define Objectives, and Identify Program Options.”

¹³⁹ Elisa Lopez Lucia, et al. "Lessons From Nigeria For Improved Thinking And Working Politically In The Extractives Sector," *Development Policy Review*, Overseas Development Institute, vol. 37(S1), (2017) 16-32,

- Regular informal and secure discussion formats are essential between USAID and implementing partners for TASCK programming.
- Grants and other support must include physical protection measures, cyber-security equipment, and other personal protection measures in high-risk contexts.
- Foreign-policy measures such as sanctions and other preventive and punitive measures must be discussed with local anti-corruption and non-governmental stakeholders to avoid doing harm.
- CSOs and media activists point out that they struggle to receive basic support from Western countries such as visa appointments at local U.S. embassies, whereas PEPs and private business personnel and military officials, who are knowingly implicated in transnational corruption schemes, receive VIP services in facilitating their foreign travel.
- Law enforcement, CSOs, and media suggested that more effort needs to be invested in innovative approaches to whistleblowing and international anti-corruption tribunals as national jurisdictions cannot be relied upon in TASCK-related objectives.

DONOR COORDINATION, INCLUDING WITH OTHER U.S. GOVERNMENT DEPARTMENTS AND AGENCIES

Some respondents highlighted that there is a strong divide between development partners such as USAID, other USG agencies, and likeminded countries' law enforcement efforts. This research has highlighted the need and unexploited potential to address transnational corruption when data and basic intelligence regarding strategic and transnational corruption are available.

For example, in Nigeria, the U.S. has deployed considerable multi-agency support ranging from the Department of Defense to targeted law enforcement support. Non-U.S. stakeholders, which have been consulted within this research, have expressed a concern that transnational corruption themes and other TASCK objectives need to be better coordinated.

Intelligence sharing (where possible recognizing sensitivities), capacity-building measures, stakeholders' coordination, and joint programming within the TASCK objectives have been suggested as practical discussion points amongst the U.S. stakeholders within the scope of TASCK.

CONSISTENCY BETWEEN FOREIGN POLICY AND DEVELOPMENT ASSISTANCE

TASCK in sub-Saharan Africa is relevant to U.S. development, political and economic interests. Consistency across government agencies is necessary if USAID's efforts on TASCK are to be successful. This affects how the United States manages its diplomatic and economic relationships in countries where kleptocratic networks are prevalent. One expert commented that for diplomacy and intelligence professionals, addressing TASCK can sometimes be seen as "having an opportunity cost" i.e., it carries the risk that it may harm strategically important relationships. In the development sector, similar perspectives are also prevalent. One argument is that raising concerns about corruption can jeopardize relationships that facilitate life-saving humanitarian assistance. These perspectives are short-term in nature and overlook the serious long-term developmental harms of TASCK. The expert cited argued that "USAID should take up the role of internal champion, standing up on the egregious issues."

Consistency is critical for civil society partnerships which can be strengthened or dramatically undercut by actions and messaging from different U.S. Departments and Agencies. One civil society respondent notably commented that “political support and legitimization for CSOs” is an extremely important element of programming in kleptocratic contexts. This includes speaking out publicly when anti-corruption activists come under threat and providing them with all available means of support.

POTENTIAL ENTRY POINTS: ELECTIONS AND POLITICAL PROCESSES

In addition to the general considerations outlined above, there are considerations for USAID to consider specifically in developing programming around elections and political processes. These include:

- **The timing of interventions:** Respondents highlighted that the majority of USAID’s and other development agencies’ programming focuses on the period shortly before elections and elections observation. As discussed, however, TASCK needs to be analyzed through and beyond the immediate cycle of elections. There will be moments outside of the campaigning period where there is a higher feasibility of pursuing reforms.
- **Managing perceptions:** As a highly political form of intervention, anti-corruption programming needs to avoid perceptions of supporting certain political parties or groups or a corrupt establishment.
- **The level of intervention:** Respondents pointed out that most election programming takes place at the national level. Sub-national elections and local political contests are deprioritized but are similarly affected by these types of challenges.

The following are six entry points for the agency to consider:

- **Advocate and support a wholesale shift in attention to political finance in elections monitoring and programming:** Our research shows that political finance has been deprioritized in both elections programming and electoral monitoring missions in the region. This is a critical dimension of electoral integrity that is consequently not adequately addressed. As a leading funder of elections assistance, USAID is well-positioned to advocate for greater attention to the issues. It can support change both by employing its voice in international fora and emphasizing the importance of addressing political finance in its existing support to EMBs and other related bodies. African regional elections networks and international working groups provide avenues for engaging elections professionals. A key agenda to promote would be the routine assessment of political finance in monitoring missions, covering issues such as public disclosure of party accounts, compliance with asset disclosure regimes, and compliance with expenditure limits. Such a shift would require new funding or a de-prioritization of some of the areas of consideration mentioned earlier.
- **Significantly expand and sustain support to CSOs and investigative journalist networks monitoring political finance and exposing abuses:** In countries where kleptocratic networks are deeply embedded, governments are not likely to be reliable partners. Support to CSOs and journalists represent more viable routes for partnerships and, as this report shows, these groups have registered successes in exposing kleptocratic networks. Although only capturing part of the picture, campaign expenditure monitoring is a form of CSO

activity gaining traction and an entry point to bridge the vast regional data gaps on political finance. Much greater attention to the problem of illicit finance in party primary processes would be merited based on our research findings. Regional exchanges on practice and capacity-building on financial data analysis could have value.

Support for investigative journalism in parallel can help to expose abuses. Priorities should be the integration of African journalists into wider international networks. Existing groups operate with insecure funding models and overall funding for this work remains low,¹⁴⁰ and negligible in comparison to the level of support for government electoral agencies. Providing a sustainable base of funding could bolster the position of these groups and enhance the impact of this work.

- **Launch a regional research program to expand the knowledge base on how to make progress in reducing corruption around elections and political processes:** Relative to other sectors, this is an area where there has been limited research on how donors might support efforts to reduce TASCK. Existing research predominantly focuses at the voter level on issues such as vote-buying and clientelist practices. Areas where there are relevant research gaps that are critical to address include: understanding what types of government institutional models can be most effective for providing oversight of political finance, including the role of SAIs and equivalent bodies; analysis of illicit finance patterns around elections; ways of incentivizing political parties and candidates to engage with oversight mechanisms; and the impact of international sanctions on political behavior.
- **Systematically integrate analysis of TASCK into early warning systems for electoral violence:** USAID has invested in developing early warning systems for election violence in several countries in sub-Saharan Africa. TASCK is a significant contributing factor to instability in the region, and in particular, strategic corruption adds a threat that might be anticipated through careful analysis of trends. There is an opportunity for USAID and relevant partners to build on existing frameworks to develop relevant indicators for tracking these issues.
- **Push sustained programming to address legal framework gaps on political finance:** As discussed, data produced by International IDEA shows most African countries have gaps in their legal frameworks which are conducive to TASCK, such as failures to ban foreign and anonymous donations. Closing these gaps will not in itself address the problem as this is about the quality of implementation. However, improving legal frameworks is a necessary step that would support accountability efforts led by CSOs and oversight institutions, allowing these actors to demonstrate that illicit political finance is unlawful.
- **Expand support to multi-stakeholder initiatives on recovery of corruption proceeds:** This is a connected area where development agencies have been able to demonstrate successes. It is relevant to TASCK in that it provides a form of response to political corruption and prevents funds from being recycled back into elections processes. Support to networks of local CSOs, national law enforcement, and regional groups such as the Economic Community of

¹⁴⁰ Elizabeth Dávid-Barrett and Slobodan, Tomić “Transnational Governance Networks Against Grand Corruption.” *SOCACE*. Research Paper 8. (2022).

<https://static1.squarespace.com/static/63e4aef3ae07ad445eed03b5/t/6481b8b73f6c6a16fa35e63b/1686223069912/transnational-governance-networks-rp8.pdf>

West African States (ECOWAS) in domestic and international confiscation proceedings is an important dimension to anti-corruption efforts in this area. The UK FCDO supported asset recovery in Nigeria and the Basel Institute of Governance strategic support to asset recovery efforts in Mozambique are examples of successful multi-stakeholder initiatives in this area.¹⁴¹

POTENTIAL ENTRY POINTS: NATURAL RESOURCES

USAID has an existing portfolio of work related to natural resources corruption and is additionally looking to fund new initiatives through its Just Energy Transition Green Minerals Challenge.¹⁴² As outlined, there are several other donors with programs in the region in this sector. A key consideration here is therefore to ensure that any form of intervention by USAID is value-additive and builds from existing initiatives.

The following are six potential entry points for the organization to consider which could complement this existing work.

- **Significantly expand and sustain support to investigative journalism groups and CSOs working on natural resources corruption, emphasizing the strengthening of international networks:** In kleptocracies across the region, donor support to CSOs and investigative journalism has played a critical role in exposing TASCK in the natural resources sector. Priorities should be the integration of African groups into wider international networks. Practically, this may involve co-development of research and advocacy projects, training on the use of data sources for natural resources (e.g., EITI data, beneficial ownership information), and providing international dissemination of stories. Although some existing work has been connected to policy debates in developed countries on their own roles in transnational corruption schemes, **USAID can support work to elevate the public profile of this investigative and research work.**
- **Make contract transparency a leading priority across engagements in the sector:** Contract transparency has lagged behind comparable disclosures on natural resource revenues. Opacity around contract terms facilitates TASCK forms of corruption at key points in the value chain. This is an issue requiring multi-stakeholder engagement from governments, firms, and civil society, making the EITI the most appropriate forum for pursuing this goal. The new EITI standard (launched June 2023) with its increased attention to corruption provides an opportunity to double down on this theme. USAID can further use its voice in international fora to advocate for progress.
- **Ensure corruption is systematically considered in due diligence and certification schemes:** the research highlighted that existing due diligence and certification schemes tend to focus on site-level human rights concerns with the corruption and integrity issues that can occur earlier in the value chain comparatively under-emphasized. Following the recommendation of an

¹⁴¹ “Mozambique drafts new civil confiscation law to boost recovery of stolen assets.” Basel Institute on Governance, July 2023, <https://baselgovernance.org/news/mozambique-drafts-new-civil-confiscation-law-boost-recovery-stolen-assets>

¹⁴² United States Agency for International Development. “Powering a Just Energy Transition Green Minerals Challenge.” (2022). <https://www.usaid.gov/document/powering-just-energy-transition-green-minerals-challenge>

Expert Group on Preventing Corruption in Energy Transition Mineral Supply Chains,¹⁴³ USAID should insist that any due diligence and certification schemes it supports in the region explicitly consider risks related to TASCK, such as hidden political ownership of firms, conflicts of interest, and undue influence over rule-making.

- **Establish a dedicated pool of funding to support strategic litigation on natural resource corruption:** In kleptocracies where the judiciary has been captured by political elites, anti-corruption campaigners do not have ready access to justice. There are several high-profile cases where campaigning groups have pursued strategic litigation on natural resource corruption in European jurisdictions.¹⁴⁴ Benefits can include bringing international attention to cases and spurring behavioral changes by international firms. Cases entail significant cost and risk, however, and should be pursued on a highly selective basis with the right technical resources in place.¹⁴⁵ Where other avenues for justice are closed, this nonetheless provides a potential route to ensuring accountability for international actors implicated in corruption schemes.
- **Replicate approaches to engaging banks on the illegal wildlife trade to other forms of natural resource corruption:** Banks are well positioned to detect illicit finance from TASCK in the natural resources sector and play enabling anti-corruption roles. There has been some innovation in programming in engaging banks on identifying money laundering typologies on the illegal wildlife trade. There is strong potential to expand this work to other forms of natural resources. Engaging national and regional banks is a priority as they are often overlooked and for some, there are incentives supporting participation (e.g., development of international correspondent relationships). USAID can provide research and play a convening role alongside other arms of government with experience in this area. It should be connected to any donor support to government anti-corruption institutions.
- **Explore and expand ways of engaging additional enabling professions in collective action initiatives:** Accountants and lawyers based both within and external to African countries have been shown to carry out important enabling roles in transnational corruption schemes. They have nonetheless largely been overlooked in existing collective action initiatives in natural resource governance which work with international extractives firms. A pan-regional initiative would seek to engage these types of professionals on issues such as client due diligence, identifying red flags of corruption, and reporting obligations and options. A sector-based approach allows more specificity in engaging professionals on common typologies of corruption.

¹⁴³ Natural Resource Governance Institute. “Preventing Corruption in Energy Transition Mineral Supply Chains.” 8

¹⁴⁴ Transparency International. “Transparency International Calls For Accountability In Madagascar’s Lychee Market.” (2022). <https://www.transparency.org/en/press/transparency-international-calls-for-accountability-in-madagascars-lychee-market>

¹⁴⁵ Achiba Gargule. “Beyond the institutional fix? The potential of strategic litigation to target natural resource.” U4. Targeting Natural Resource Corruption. Topic Brief. (February 2022). https://files.worldwildlife.org/wwfcomprod/files/Publication/file/62kojs40oe_TNRC_Strategic_Litigation_2022.pdf?_ga=2.137605046.78076520.1646058508-1344211080.1644426548

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ANNEX B. CONSULTATIVE INTERVIEW GUIDE

ELECTIONS THEME (questions for in-country interviewees) Interview questions	RQ
<p>Part I: Understand the Issues</p> <ol style="list-style-type: none"> 1. What are the most common types of corruption which occur around election processes? 2. Which of these types of corruption do you believe have regional/ international dimensions? 3. Are there any notable cases you would highlight which illustrate the issues well? 4. On political finance specifically, what evidence is there to suggest this involves illicit financial flows from actors with regional or international links? <ol style="list-style-type: none"> a. What is the source of these funds? (organized crime, international firms, foreign states, diaspora networks) b. What are the motivations of these actors? c. Who are the (domestic and international) actors who enable these forms of corruption? d. Which jurisdictions are relevant to this activity? (i.e., relevant intermediary countries and developed countries where assets are held) 5. When are the highest points of vulnerability in the elections cycle to these types of corruption? (pre-electoral period, campaigning, post-electoral period) 6. Are different types of elections affected differently by these issues? (Presidential, legislative, sub-national) <p>Strategic Corruption</p> <ol style="list-style-type: none"> 7. How susceptible are election processes in the country to foreign interference? 8. What level of evidence is there to suggest this interference involves corruption? 9. How does this corruption take place? (e.g., bribery; finance in exchange for access, allocation of commercial opportunities, e.g. natural resources) 10. What role do enablers play in these processes? 11. If there is no indication of strategic corruption, why is this? What is it about the country circumstances which discourage strategic corruption? <p>Cross-sector linkages: what is the level of evidence to suggest corruption proceeds from the natural resources sector are used for campaign and political party finance?</p>	I

ELECTIONS THEME (questions for in-country interviewees) Interview questions	RQ
<p>Part II: Consequences</p> <p>12. To what extent do you believe these forms of corruption influence electoral outcomes/ electoral integrity?</p> <p>13. Are there any specific elections/ campaigns you would reference which illustrate this?</p> <p>14. What other harms do these types of corruption cause? (for example negative governance, economic or social outcomes)</p>	I
<p>Part III: Programming Responses</p> <p>15. What are the main types of measures which have been taken to date to combat these issues? How successful do you think they have been? (see below for an initial list of the types of programming we could explore)</p> <p>16. Who are the key stakeholders who have been involved in developing these measures? (e.g., Electoral Management Bodies, specific international development agencies, other US agencies, civil society, judiciary)</p> <p>17. What opportunities could there be in the future to make changes?</p> <p>18. To what extent would change be politically feasible?</p> <p>19. Are there any broader governance interventions necessary to support these measures?</p> <p>20. What would success look like? What indicators could be used to determine whether an approach is working?</p> <p>21. Do you foresee any risks for any stakeholders involved in these types of interventions?</p> <p>22. Do you see any specific opportunities and entry points for an organization like USAID?</p> <p>For reference purposes: initial list of program types to consider²³⁵</p> <p>Transparency</p> <ul style="list-style-type: none"> ● Improving transparency and access to information on political party and electoral financing (party reporting and disclosure obligations) ● Asset disclosures for PEPs <p>Social and institutional accountability</p>	2, 3

²³⁵ Categorization according to the USAID anti-corruption sectoral guide

ELECTIONS THEME (questions for in-country interviewees)	RQ
<p>Interview questions</p> <ul style="list-style-type: none"> ● Strengthening the capacity of oversight institutions (e.g. electoral management bodies, law enforcement, judiciary) to investigate/ sanction abuses ● Supporting civil society to detect issues/ protecting the civic space for this work ● Supporting local investigative media and supporting of networking between local and international media networks ● Coordination between USAID and other US agencies/ development agencies on the issues ● Coordination between USAID and other like-minded development partners <p>Prevention</p> <ul style="list-style-type: none"> ● Legal and policy changes e.g., expenditure limits; bans on foreign donations ● Enforcement of legal and policy changes by relevant supervisory authorities/ law enforcement <p>Detection</p> <ul style="list-style-type: none"> ● Follow the money methods ● Strengthening audit capacity over party/ electoral finance ● Intelligence-sharing between enforcement agencies across jurisdictions 	2, 3

NATURAL RESOURCES (questions for in-country interviewees)	RQ
<p>Part I: Understanding the Issues</p> <ol style="list-style-type: none"> 1. There are different ‘venues’ where corruption can manifest in the natural resources sector (see <i>initial list at end of section</i>). In which of these venues do you think the transnational linkages to corruption are most critical? 2. Who are the key regional/ international actors involved in these forms of corruption? ((international firms (E&P, service, commodity traders), organized crime, foreign state-owned enterprises) What are the motivations of these actors? 3. Who are the (domestic and international) actors who enable these forms of corruption and what roles do they fulfill? <ol style="list-style-type: none"> a. Which intermediary countries facilitate this corruption? b. What are the most common destination countries for proceeds of corruption? c. What types of assets are corrupt proceeds most commonly invested in? 4. Are there any notable cases you would highlight which illustrate the issues well? 	I

NATURAL RESOURCES (questions for in-country interviewees)	RQ
<p>Strategic Corruption</p> <ol style="list-style-type: none"> 5. To what extent do you think the natural resources sector is a target for strategic corruption? 6. Which foreign states are the perpetrators? What are their motivations? 7. Who are the domestic actors collaborating with foreign states? What are their motivations? 8. What role do enablers play in these processes? 9. If there is no indication of strategic corruption, why is this? What is it about the country circumstances which discourage strategic corruption? <p>For reference purposes, ‘venues’ in the natural resources sector where transnational/ strategic corruption linkages are prominent.</p> <ol style="list-style-type: none"> 1. Licensing <p><i>Most relevant issues: bribery or undue influence to obtain access to resources; awards to politically connected firms; bribery or undue influence to obtain access to commercial information/ favorable fiscal terms</i></p> 2. Management of state revenues from natural resources <p><i>Sovereign Wealth Funds and other savings vehicles (embezzlement of funds; bribery/ conflicts of interest in their management; funds allocated for patronage)</i></p> <p><i>Resource-backed loans: lender selection influenced by bribery, undue influence, conflicts of interest; favorable loan terms allowing kickbacks on deals; misappropriation or misallocation of proceeds from the loan)</i></p> 3. State-owned enterprises <p><i>Commodity sales: terms which excessively favor the buyer to allow kickbacks on transactions; bribery/ undue influence over contracts for sales and access to commercial information</i></p> <p><i>Procurement: bribery/ undue influence over contract awards; contracts awarded to political elites</i></p> <p><i>Misappropriation of funds from the SOE</i></p> 4. Specific dynamics around conflict settings <p><i>Looting of resources by armed groups/ organized crime; allocations to politically connected firms/ state actors; regional networks for smuggling/ illicit exports; military involvement in natural resource looting</i></p> 	I

NATURAL RESOURCES (questions for in-country interviewees)	RQ
<p>Part II: Consequences</p> <p>10. What are the main harms caused by these forms of corruption? (Consider environmental damages, economic harm, including loss of state revenues, undermining the integrity of state institutions, harms to electoral integrity where there are overlaps with elections, broader negative social impacts)</p> <p>11. Are there any specific cases you would refer to which illustrate these harms?</p>	I
<p>Part III: Programming Responses</p> <p>12. What are the main types of measures which have been taken to date to combat these issues? How successful do you think they have been? (see below for an initial list of the types of programming we could explore)</p> <p>13. Who are the key stakeholders who have been involved in developing these measures? (e.g., regulators, government institutions, specific international development agencies, other US agencies, civil society, judiciary)</p> <p>14. What opportunities could there be in the future to make changes?</p> <p>15. To what extent would change be politically feasible?</p> <p>16. Are there any broader governance interventions necessary to support these measures?</p> <p>17. What would success look like? What indicators could be used to determine whether an approach is working?</p> <p>18. Do you foresee any risks for any stakeholders involved in these types of interventions?</p> <p>19. Do you see any specific opportunities and entry points for an organization like USAID?</p> <p>For reference purposes: initial list of program types to consider²³⁶</p> <p>Transparency</p> <ul style="list-style-type: none"> ● Improving access to information on revenue management, licenses, SOE management, SWF management etc. ● Support to the EITI (and orientation to look more closely at corruption issues) ● Support to OGP <p>Social and institutional accountability</p> <ul style="list-style-type: none"> ● Strengthening the capacity of oversight institutions (e.g., sectoral regulatory authorities, law enforcement, judiciary) to investigate/ sanction abuses 	2,3

²³⁶ Categorization according to the USAID anti-corruption sectoral guide

NATURAL RESOURCES (questions for in-country interviewees)	RQ
<ul style="list-style-type: none"> ● Supporting civil society to detect issues/ protecting the civic space for this work ● Coordination between USAID and other US agencies/ development agencies on the issues ● International asset recovery efforts <p>Prevention</p> <ul style="list-style-type: none"> ● Legislative/ regulatory reforms which lower risks ● Procurement reform at key institutions ● Integrity requirements for international firms ● Reducing high risk processes e.g. agent use in the sector ● Reducing risk of political interference in enforcement <p>Detection</p> <ul style="list-style-type: none"> ● Follow the money methods ● Strengthening audit capacity over key institutions/ transactions ● Cross-jurisdictional cooperation between national and international law enforcement agencies ● Cooperation between national law enforcement agencies and civil society 	<p>2,3</p>

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