

## Advancing Anti-Corruption in Extractive Industries through a Political Economy Lens

*This document provides background to participants joining the Executive Sessions Roundtable organized by Global Integrity and the Columbia Center on Sustainable Investment (CCSI). The objective is to ensure participants have a shared starting point in order to set expectations and more effectively achieve the objectives of the day. The Roundtable will take place in Washington, D.C., on December 5, 2019.*

---

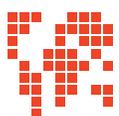
### Objectives

- To explore how different approaches to applied political economy analysis can help practitioners make progress toward more effectively tackling corruption;
  - To explore the role power, incentives, and interests play, in order to explore how actors can exert agency; and
  - To brainstorm ideas about how to change, amend, or complement existing anti-corruption approaches.
- 

### About the Executive Sessions Roundtable

The roundtable will bring together select participants to discuss and brainstorm how to better integrate Thinking and Working Politically (TWP) approaches into the ways we, as anti-corruption practitioners and advocates, design interventions, with a spotlight on extractive industries (EI). During the meeting, participants will unpack and discuss promising routes of understanding and grappling with corruption, focusing on political economy approaches that could help stakeholders become more effective in doing their work.

Questions around power, politics, interests, and incentives will be front-and-center in order to identify mechanisms to better navigate the political realities of anti-corruption work and achieve greater impact.



## The Problem(s) with Current Anti-corruption Approaches

Corruption can be defined as the abuse of entrusted power for private gain.<sup>1</sup> The concept covers a broad range of activities, including political capture and interference; conflict of interest; bribery; extortion; fraud; embezzlement; misappropriation and diversion of resources; abuse of power or function; illicit enrichment; embezzlement; and manipulation of policies, institutions, and rules of procedure. The pernicious effects of corruption on sustainable development outcomes and prospects for open and accountable governance are globally recognized, and attempts to counter these effects are widespread. Unfortunately, existing approaches to anti-corruption are not working as well as once hoped.

### *Existing approaches to anti-corruption*

Anti-corruption efforts in extractive industries (EI) and beyond have largely focused on promoting greater transparency, accountability, and participation (TAP), strengthening regulatory frameworks, building institutions, or advocating for norms and standards related to these. Examples include instituting peer review or oversight mechanisms<sup>2</sup> within and between countries, passing freedom-of-information laws, or promoting the use of open data standards. Current TAP efforts typically are based on transplanting ideas and thinking about what constitutes ‘good governance’ from one context to another, betting that legislative and institutional reforms that seem to have worked in one context will work elsewhere. Yet, there is a growing recognition that good institutions, policies, norms, and standards are neither easy to prescribe—given unique contextual challenges—nor are their adoption and implementation especially successful.<sup>3</sup>

### *Limitations of existing approaches*

Practitioners and academics increasingly recognize that the field’s work on anti-corruption has yielded limited results, often failing to achieve substantive progress toward actually reducing corruption. Instead, marginal changes (e.g., increases in transparency) are produced in the operating environment and occasional successes are achieved in detecting and/or prosecuting corrupt acts without meaningfully improving outcomes systemwide.<sup>4</sup>

There are no doubt multiple factors contributing to the perceived shortcomings of anti-corruption efforts, as well as various hypotheses about how to advance more effective anti-corruption efforts moving forward.<sup>5</sup> Some experts focus on a need for better technical guidance and institutional resources for identifying, measuring, and combating corruption. Others see improved technological tools as critical to improving the performance of existing approaches to anti-corruption (e.g., by making corruption easier to detect and exposing corrupt acts to a wider audience).

Alongside the above, there is a growing body of evidence that suggests there are factors other than formal institutions, technical acumen, and capacity that determine outcomes of TAP initiatives in anti-corruption—namely **politics, power, and incentives** (typically referred to under the problematic label of “political will”<sup>6</sup>). All of these political and economic factors have a major influence on the actions and choices key actors make when shaping the trajectory and fate of anti-corruption reforms.<sup>7</sup> Yet, considerations about the interests and incentives of influential stakeholders—and the extent to which they might propel or block different strategies—rarely factor into the design of anti-corruption programs.

If improving the impact of anti-corruption approaches is a priority, then technocratic and normative approaches must be complemented by work that squarely and systematically engages with political concerns. **Thus, at this meeting, we will turn our collective attention to starting down this road.** As an initial step, **we will surface some of the specific ways that current approaches to anti-corruption, particularly in the extractive industries, are undermined by political economy considerations** (e.g., putting implementation in the hands of those who do not have an interest in seeing reforms meaningfully enacted; failing to account for powerful actors—global through local, within and beyond government—who for various reasons oppose the realization of anti-corruption reforms;<sup>8</sup> or failing to identify and strategically deploy actors with a genuine interest in combating corruption).

## Toward More Politically Savvy Approaches to Corruption

### *Thinking and working politically in principle*

The bulk of discussions at this meeting will focus on generating and developing ideas for more systematically integrating political economy considerations into approaches to anti-corruption in EI in order to improve the impact of this work moving forward. Thankfully, we have some resources and lessons on which to draw, many of which come from several years of work by the Thinking and Working Politically (TWP) community of practice. At a general level, employing a TWP lens entails thinking about, and working with, greater awareness of the political dynamics that shape a particular problem in a specific context.<sup>9</sup> TWP is based on the understanding that outcomes are necessarily (and legitimately) shaped by power, interests, relationships between key actors, incentives, and the norms that frame actors' behaviors, rather than just laws or the formal processes and institutions which, to some degree, continue to shape the space in which action is taken.

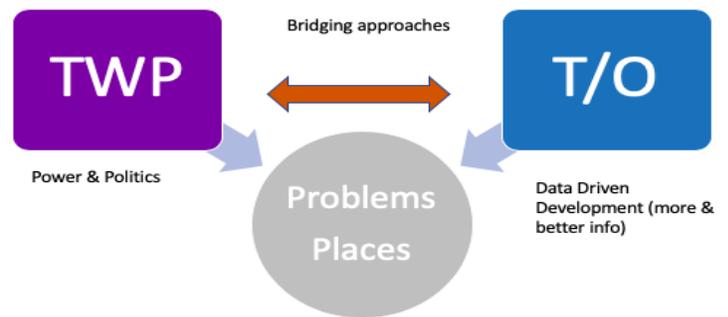
Although there is no single agreed-upon definition or framework, the TWP community of practice has identified some common core principles for thinking and working politically in practice. The following table provides an overview of these principles and their characteristics:

Principle	Characteristics
Politically smart	Context-specific analysis of the political economy, power, interests, and incentives at the core of design and implementation  Technical approaches informed by political awareness and responsive to political opportunities
Locally led	Employment of best-fit (not best-practice) strategies driven by the demands and opportunities of a given context
Adaptive and flexible	Flexible, responsive, and adaptive programming based on real-time learning instead of following blueprint thinking / planning  Flexible Monitoring, Evaluation, and Learning (MEL) frameworks for tracking non-linear progress
Problem-driven and iterative	Real-world problems of a specific context are identified and engaged through tailored responses  Strategies and tactics regularly (re)evaluated in response to changes in context
Brokering relationships	Trust built between stakeholders in order to identify shared problems and collaborate and co-create potential solutions
Long-term commitment	Sufficient resources allocated to cover the level of effort required to build relationships, and understand and engage with the ecosystem, acquiring local knowledge and testing strategies

### *Six Principles of TWP Approaches<sup>10</sup>*

A growing number of practitioners in the anti-corruption space are beginning to complement existing approaches around fostering transparency and increasing the availability of data with insights about, and awareness of, the prevailing power dynamics and incentives that exist within a given context. Localizing interventions by grounding them firmly in the specificities of a given context is thought to create important preconditions for anti-corruption efforts to make a discernible impact. Ideally, this process is driven by concrete problems, as identified by those who have the highest stakes in resolving a particular undesirable situation. Enriching technical and normative transparency approaches with TWP approaches might help steer these mechanisms in more productive directions, enabling actors to design strategies with greater impact and improving outcomes in EI. For instance, by focusing on the role that power,

politics, and incentives play, TWP can provide a powerful perspective for potentially strengthening TAP interventions to more effectively achieve the desired impacts on corruption. The diagram at right illustrates the opportunity to leverage both TWP and the conventional transparency / openness (T/O) approaches largely pursued by anti-corruption initiatives to more successfully address specific anti-corruption problems within specific contexts.



### ***Thinking and working politically in practice***

Applying TWP principles in practice can take different forms. Following are a few examples of applied political economy approaches that can help drive effective reform:

- [USAID Thinking And Working Politically Through Applied Political Economy Analysis](#)<sup>11</sup>  
Through the use of applied political economy analysis, the United States Agency for International Development (USAID) is applying a structured approach to examining power dynamics and economic and social forces that influence development. Applying political economy analysis in the field of corruption is a method for promoting strategic responses to corruption based on a more comprehensive and advanced understanding, as well as awareness of the enabling and/or disabling contextual factors for governance and anti-corruption reform. The purpose of engaging in political economy analysis is to provide technical assistance appropriate for the political climate of reform, as well as assistance that generates government responsiveness.
- [Department for International Development \(DFID\) Drivers of Change Approach](#)<sup>12</sup>  
The DFID Drivers of Change approach recognises that formal and informal rules, power structures, vested interests, and incentives within institutions are essential to understanding how change happens. In order to better understand the change process, the approach analyzes the interaction between agents (individuals and organizations), economic and social structures, and institutions as components affecting both positive and negative change. Although this is an approach not targeted specifically at anti-corruption, the analytical thinking that underpins the approach is useful to practitioners and funders working on anti-corruption.
- [Sectoral Anti-corruption Strategies that Target Specific Problems](#)<sup>13</sup>  
The SOAS University of London-based Anti-Corruption Evidence (ACE) Consortium—sister program to the Global Integrity Anti-Corruption Evidence (GI-ACE) research programme—has developed an approach to anti-corruption that moves away from emphasizing the enforcement of the rule-of-law or impunity. This alternative approach uses sector-specific power and interest mappings to identify strategies that are most likely to achieve progress on the ground because they are actively aligned with the interests of powerful and influential actors (within and beyond government) in a particular context.
- [Curbing Corruption—Sector Strategies for Curbing Corruption](#)<sup>14</sup>  
Curbing Corruption proposes to pursue effective anti-corruption strategies through a targeted, sectoral approach aimed at identifying viable and feasible reforms in a given context, based on local stakeholders’ understanding of the landscape of interests and priorities shaping the sector. The approach supports local actors in disaggregating and prioritizing reforms, and helps these actors design solutions tailored to the specific political context in a sector.

## Spotlight on Extractive Industries

In order to focus on tangible points and to bring greater precision to our discussions—reflecting the focus of CCSI’s [Executive Session on the Politics of Extractive Industries](#)—the **practical and empirical focus of this meeting is on anti-corruption reforms specifically in EI**. The remainder of this document provides some basic background on the subfield of governance and development work focused on EI, as well as a primer on corruption across the EI value chain.

### **Good governance of extractive industries: The basics**

For the purposes of our discussion, we will consider EI to comprise those that extract oil, gas, and mineral resources. At best, EI can contribute to the economic prosperity and well-being of host countries, generating significant revenues to be used to improve a range of development outcomes. At worst, various aspects of the so-called “resource curse” can take hold, undermining economic, political, social, and environmental outcomes for host countries along the way—from distorting the long-term health of economies, consolidating authoritarian regimes, and triggering civil wars in some settings<sup>15</sup> to causing environmental degradation and abuses of indigenous peoples’ rights and lands.<sup>16</sup> Promoting “good” governance of extractive industries (GEI) has been identified as one of the main areas of intervention in order to advance more positive outcomes from EI. As a result, the GEI field has become the focus of a great deal of activity by global development and human rights actors.

Work in the GEI field is typically organized around the EI value chain that identifies key areas of activity in the process of converting the extraction of natural resources into public benefit, as depicted in the following diagram.<sup>17</sup>



Halland, Havard; Lokanc, Martin; Nair, Arvind; Kannan, Sridar Padmanabhan. 2015. *The Extractive Industries Sector: Essentials for Economists, Public Finance Professionals, and Policy Makers*. World Bank Study. Washington, DC: World Bank.

Although EI can potentially generate significant public benefits, each stage of the value chain is vulnerable to decisions and actions that can prevent the realization of these benefits. In an effort to ensure their realization, a range of organizations has identified “best” practices across the EI value chain<sup>18</sup> to support actors’ technical capacity to counter the negative effects of mismanagement and corruption. Initiatives and programs to promote transparency and accountability in the sector have been particularly widespread.<sup>19</sup>

### **Corruption in extractive industries**

Because of the vast revenues at stake, particularly with oil and gas, EI dependence has been associated with heightened corruption risk, a key challenge animating those hoping to improve GEI.<sup>20</sup> For closely related reasons, the sector also is prone to opacity and control being concentrated in the hands of a small group of political and economic elites, another set of conditions that amplifies the vulnerability of the sector to corruption and political capture.<sup>21</sup> As a result, corruption is pervasive and extremely difficult to address. Indeed, Transparency International regards EI as being amongst the most corrupt sectors in the world.<sup>22</sup>

The Organisation for Economic Co-operation and Development (OECD), DFID, and Transparency International identify various types of corruption<sup>23</sup> across the EI value chain<sup>24</sup> which include contracts and

licensing; regulation and monitoring of operations; revenue collection and allocation; and implementation of sustainable development, as further delineated below.

### ***Contracts and licensing***

- Bribery and/or collusion between domestic or foreign public officials in exchange for awarding licenses and contracts
- Patronage and clientelism in awarding licenses and contracts
- Political interference, influence peddling, or extortion to influence decision making or to circumvent and/or overlook decision-making processes and other regulation, such as environmental preservation rules
- Exercise of undue influence to gain favourable contractual terms and/or permits
- Rent-seeking by imposing politically connected local partners on licenses
- Bribery in exchange for tailoring laws and regulations to the advantage of private-sector agents
- Bribery in exchange for overlooking or expediting bureaucratic procedures

### ***Regulation and monitoring of operations***

- Conflict of interest between State-owned Enterprises (SoEs) acting as both regulator and administrator
- Fraud and document falsification in audit reports on production outputs and activities
- Illegal resource extraction
- Resource theft (diversion of production outputs and assets)
- Extortion by means of threats to security or continuity of operations
- Bribery and/or collusion of domestic or foreign public officials in exchange for receiving preferential treatment in the enforcement of regulations and tax collection
- Patronage and clientelism in awarding operating licenses and contracts
- Corruption in the procurement of goods and services
- Bribes in exchange for tailoring laws and regulations to the advantage of private sector agents
- Bribery in exchange for overlooking or expediting bureaucratic procedures

### ***Revenue collection***

- Diversion to private gain—by using beneficial ownership secrecy and/or offshore shell companies to hide corrupt activity—of extractive resources meant for public benefit
- Bribery, patronage, and clientelism in the awarding of procurement contracts and bids for delivery of services
- Illegal resource extraction
- Extortion in the collection of taxes, royalties, and other fees
- Bribery in exchange for paying lower or no taxes
- Fraud and document falsification in revenue reporting

### ***Revenue allocation***

- Diversion to private gain—by using beneficial ownership secrecy and/or offshore shell companies to hide corrupt activity—of extractive resources meant for public benefit
- Patronage, clientelism, political interference, or extortion to influence decision-making in investment decisions

### ***Implementation of sustainable development***

- Misuse and diversion of public resources Bribery, patronage, and clientelism in the awarding of procurement contracts and bids for delivery of services
- Bribery in exchange for lowering standards or overlooking decision-making processes and other regulation, such as environmental preservation rules
- Bribery in exchange for tailoring laws and regulations to the advantage of private-sector agents

More information on corruption in extractive industries:

[www.u4.no/topics/oil-gas-and-mining/basics](http://www.u4.no/topics/oil-gas-and-mining/basics)  
[www.globalwitness.org/en/campaigns/oil-gas-and-mining/#more](http://www.globalwitness.org/en/campaigns/oil-gas-and-mining/#more)

## ***Anti-corruption in extractive industries***

Because of the extent and magnitude to which corruption pervades EI, many efforts have prioritized passing and implementing anti-corruption laws or policies. Interventions to combat corruption in EI mostly consist of the following approaches:

- Norm-setting around transparency and accountability at the international level through multistakeholder initiatives (MSIs), including through the Extractive Industries Transparency Initiative (EITI), Publish What You Pay (PWYP), etc.;
- Promoting transparency laws, policies, and institutions to better diagnose corruption risks in order to enhance and better monitor compliance requirements, including through open data standards, beneficial ownership transparency, etc.;
- Advocacy around adoption of anti-corruption regulations and standards for government agencies, including through anti-corruption compliance mechanisms;
- Advocacy around adoption of anti-corruption standards and practices for EI;
- Naming and shaming activities by international nongovernmental organizations (INGOs), such as Global Witness; and
- Reporting on, and monitoring the enforcement of, anti-corruption laws.

As with anti-corruption work more generally, these efforts have resulted in limited success, with little progress toward achieving their ultimate goals.<sup>25</sup> Indeed, a recent Natural Resource Governance Institute (NRGI) study of implementation of GEI reforms and laws in Sub-Saharan Africa found major gaps around transparency and accountability provisions.<sup>26</sup> A 2018 study by the South African Institute of International Affairs and Democracy assessed three MSIs (one of which was EITI) and found that most member countries commit to transparency and accountability norms and requirements but fail to implement them.<sup>27</sup> According to the study, this is mostly because countries join MSIs for political reasons (e.g., obtaining legitimacy with international and domestic stakeholders), but lack genuine political will for reform, with the result being what is called “open-washing” or “isomorphic mimicry.”<sup>28</sup> According to the 2017 World Development Report, carefully designed and seemingly sensible policies often fail to be implemented or generate outcomes because governance processes “take place in complex political and social settings, in which individuals and groups with unequal power interact within changing rules as they pursue conflicting interests.”<sup>29</sup>

Again, it is precisely these issues that we plan to tackle at this meeting.

---

## **REFERENCES**

<sup>1</sup> Slightly amended definition from “How do you define corruption?”, Transparency International, <https://www.transparency.org/what-is-corruption#define>; Department of International Development (DFID), “Why corruption matters: understanding causes, effects and how to address them: Evidence paper on corruption,” January 2015, [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/406346/corruption-evidence-paper-why-corruption-matters.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/406346/corruption-evidence-paper-why-corruption-matters.pdf)

<sup>2</sup> An example from “Implementation of the EITI Standard 2019” is the requirement by EITI members to agree to undergo oversight by a multistakeholder group, [https://eiti.org/sites/default/files/documents/eiti\\_standard\\_2019\\_en\\_a4\\_web.pdf](https://eiti.org/sites/default/files/documents/eiti_standard_2019_en_a4_web.pdf)

<sup>3</sup> “When are we going to stop giving solution driven aid?”, Valedictory lecture by David Booth delivered at the Overseas Development Institute (ODI), London, 23 April 2018.

<sup>4</sup> “Combating Corruption in the Twenty-First Century: New Approaches”, Heywood, P (2018), *Daedalus: A publication of the American Academy of Arts and Sciences*; <https://www.amacad.org/publication/combating-corruption-twenty-first-century-new-approaches>; “Anti-Corruption in Adverse Contexts: A Strategic Approach,” Khan, et al (2016), SOAS working paper, [https://eprints.soas.ac.uk/23495/1/Anti-Corruption%20in%20Adverse%20Contexts%20\(1\).pdf](https://eprints.soas.ac.uk/23495/1/Anti-Corruption%20in%20Adverse%20Contexts%20(1).pdf); “Pressure to change: a new donor approach to anti-corruption?” Blog by Phil Mason, Senior Anti-corruption Adviser at DFID. Published in the *Journal for Public Administration Review*, 22 October 2018, <https://www.publicadministrationreview.com/2018/10/22/pressure/>

<sup>5</sup> See, for example, <https://www.u4.no/publications/understanding-success-and-failure-of-anti-corruption-initiatives>

<sup>6</sup> <https://oxfamblogs.org/fp2p/why-demanding-political-will-is-lazy-and-unproductive/> For an analysis that unpacks political will and explores its impact on anti-corruption efforts, see <https://onlinelibrary.wiley.com/doi/10.1002/pad.1815>

<sup>7</sup> “Anti-corruption in adverse contexts: Strategies for improving implementation,” working paper by Mushtaq Khan, Antonio Andreoni, Pallavi Roy, September 2019, <https://ace.soas.ac.uk/publication/anti-corruption-in-adverse-contexts-strategies-for-improving-implementation/>; Department for International Development (DFID), “Why corruption matters: understanding causes, effects and how to address them: Evidence paper on corruption,” January 2015, [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/406346/corruption-evidence-paper-why-corruption-matters.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/406346/corruption-evidence-paper-why-corruption-matters.pdf)

<sup>8</sup> For an interesting view on the role non-aid agencies of home governments can play in undermining anti-corruption efforts, see <https://voices.transparency.org/reflections-of-an-anti-corruption-fighter-638f3c5b2411>

<sup>9</sup> USAID Centre of Excellence, Democracy, Human Rights and Governance, “Thinking and Working Politically through Applied Economic Analysis: A guide for practitioners,” [https://usaidlearninglab.org/sites/default/files/resource/files/pea\\_guide\\_final.pdf](https://usaidlearninglab.org/sites/default/files/resource/files/pea_guide_final.pdf)

<sup>10</sup> Table based on “Thinking and working politically: Reviewing the evidence on the integration of politics into development practice over the past decade” paper by Ed Laws and Heather Marquette, March 2018, <https://twpcommunity.org/wp-content/uploads/2018/04/Thinking-and-working-politically-reviewing-the-evidence.pdf>; “Thinking and Working Politically: Learning from practice,” Overview to Special Issue by Neil McCulloch and Laure-Hélène Piron, January 2019, <https://thepolicypractice.com/wp-content/uploads/2019/06/TWP-Learning-from-practice.pdf>

<sup>11</sup> USAID, “Thinking and working politically through applied political economy analysis,” <https://www.usaid.gov/documents/1866/thinking-and-working-politically-through-applied-political-economy-analysis>

<sup>12</sup> DFID (2004) Drivers of Change, DFID Public Information Note, <https://thepolicypractice.com/library/drivers-of-change/>

<sup>13</sup> <https://ace.soas.ac.uk/publication/anti-corruption-in-adverse-contexts-strategies-for-improving-implementation/>

<sup>14</sup> Curbing Corruption is an anti-corruption research platform founded in 2018 by Mark Pyman, <https://curbingcorruption.com>

<sup>15</sup> <https://www.sscnet.ucla.edu/polisci/faculty/ross/papers/articles/Ross%20-%20What%20have%20we%20learned%20ARPS%202015.pdf>

<sup>16</sup> [https://resourcegovernance.org/sites/default/files/nrgi\\_Resource-Curse.pdf](https://resourcegovernance.org/sites/default/files/nrgi_Resource-Curse.pdf)

<sup>17</sup> Extractive Industries Transparency Initiative (EITI) Global Fact sheet, September 2019, [https://eiti.org/sites/default/files/documents/eiti\\_factsheet\\_en\\_09.2019.pdf](https://eiti.org/sites/default/files/documents/eiti_factsheet_en_09.2019.pdf)

<sup>18</sup> See, for instance, the EI Sourcebook, <https://www.eisourcebook.org/>, and the Natural Resource Charter, <https://resourcegovernance.org/approach/natural-resource-charter>

<sup>19</sup> While much of this work was initially focused on transparency of EI revenue collection, in recent years, the field has turned its attention to shining light on everything from EI contracting and licensing processes to budgeting and beneficial ownership. See EITI’s overview of EI transparency, <https://eiti.org/eiti-value-chain>, and Publish What You Pay’s “Chain for Change,” <https://www.pwyp.org/pwyp-resources/vision-2020-2/>

<sup>20</sup> “What have we learned about the resource curse?,” journal paper by Ross, M. (2014), *Annual Review of Political Science*, Vol 18, 239-259, <https://www.sscnet.ucla.edu/polisci/faculty/ross/papers/articles/Ross%20-%20What%20have%20we%20learned%20ARPS%202015.pdf>

<sup>21</sup> <https://www.u4.no/topics/oil-gas-and-mining/basics>

<sup>22</sup> Of the 124 countries that scored below 50 in Transparency International’s 2017 Corruption Perceptions Index, 73 are considered to be natural resource-rich (approximately 59 percent), according to the latest Resource Governance Index, Transparency International and EU, “Under the surface, looking into payments by oil, gas and mining companies to governments,” October 2018, [https://eiti.org/sites/default/files/documents/under-the-surface\\_full\\_report1.pdf](https://eiti.org/sites/default/files/documents/under-the-surface_full_report1.pdf)

<sup>23</sup> OECD (2016), “Corruption in the Extractive Value Chain: Typology of Risks, Mitigation Measures and Incentives,” OECD Development Policy Tools, OECD Publishing, Paris, <https://doi.org/10.1787/9789264256569-en>; Transparency International and U4 Resource Centre, “Basic guide to corruption and anti-corruption in oil, gas, and mining sectors,” <https://www.u4.no/topics/oil-gas-and-mining/basics>; Department of International Development (DFID), “Why corruption matters: understanding causes, effects and how to address them: Evidence paper on corruption,” January 2015, [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/406346/corruption-evidence-paper-why-corruption-matters.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/406346/corruption-evidence-paper-why-corruption-matters.pdf)

<sup>24</sup> <http://www.oecd.org/dev/Corruption-in-the-extractive-value-chain.pdf>

<sup>25</sup> EITI, for example, reviews their members’ progress against the EITI requirements in a process called “validation.” This has resulted in the finding that most members are yet to make meaningful progress in terms of implementing significant aspects of EITI standards and requirements. <https://eiti.org/about/how-we-work#upholding-the-standard-internationally-validation>

<sup>26</sup> <https://resourcegovernance.org/analysis-tools/publications/sub-saharan-africa-implementation-gap>

<sup>27</sup> “Multi-stakeholder initiatives: Lessons learned” a report by Democracy International and the South Africa Institute of International Affairs and Democracy, April 2018, <https://www.saiia.org.za/wp-content/uploads/2018/08/2018-MSIs-Lessons-Learned-Summary.pdf>

<sup>28</sup> Andrews, M., Pritchett, L., and Woolcock, M. (2017), “Looking like a state: the seduction of isomorphic mimicry,” in *Building State Capability: Evidence, Analysis and Action*, Oxford Press.

<sup>29</sup> World Bank Group, World Development Report 2017: “Governance and the Law,” <https://openknowledge.worldbank.org/handle/10986/25880>