

ANTI-CORRUPTION HELPDESK

PROVIDING ON-DEMAND RESEARCH TO HELP FIGHT CORRUPTION

OVERVIEW OF CORRUPTION AND ANTI-CORRUPTION IN AFGHANISTAN

QUERY

Can you provide an overview of corruption and anti-corruption efforts in Afghanistan, focusing particularly on public financial management?

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NOTE

This answer draws on a previous U4 Helpdesk answer: [Risks for development cooperation in fragile and transitional states](#).

SUMMARY

Afghanistan faces major governance and corruption challenges that threaten the country's state-building process, undermining the government's legitimacy, stability, and rule of law. The problem of corruption in the country is exacerbated by the prevalence of illicit drug activities, a weak public administration and the large amounts of international aid flowing into the country. Corruption permeates most government sectors and institutions. To guarantee that money is well spent and services are delivered effectively, it is crucial that Afghanistan's public financial management system functions in an accountable and transparent manner. With the support of the international community, the government of Afghanistan has made major progress with regards to budget planning and execution, public procurement processes, and revenue collection and management. However, in spite of these improvements, Afghanistan still lacks the capacity to continue progressing in these areas without external (technical and financial) support.

1 OVERVIEW OF CORRUPTION IN AFGHANISTAN

Background

Afghanistan is still trying to recover from years of civil war, and despite an increase in GDP growth and revenue collection, as well as improvements in health and education in the past years (Bertelsmann Transformation Index, 2012), the country still faces many challenges, of which corruption is certainly among the most serious.

As is the case in other post-conflict countries, it was only several years after the international intervention started that corruption began to be recognised and included in the public agenda. In fact, in Afghanistan, corruption has become one of the major threats to the government's legitimacy, stability, rule of law and state-building (Gardizi et al., 2010). In the coming year, as the country prepares for a period of economic, political (presidential elections are to take place in 2014) and military transition, more attention to the fight against corruption and increased transparency and accountability in government operations will be crucial for a better and more stable future for Afghanistan.

Extent of corruption

Transparency International's 2012 *Corruption Perceptions Index* ranks Afghanistan 174th out of the 176 countries and territories assessed, with a score of 8, on a scale from 0 (highly corrupt) to 100 (very clean). Next to North Korea, Afghanistan is the worst performer in the Asia Pacific region (Transparency International, 2012).

Similarly, Afghanistan has consistently scored poorly in the World Bank Worldwide Governance Indicators. In 2012, the country scored 1.91 on control of corruption, on a scale from 0 to 100, and it has shown no significant improvement across the years. The scores on rule of law have also remained low, and even deteriorated in the period between 2002 and 2012. Scores on other indicators such as voice and accountability, political stability and government effectiveness have also remained fairly low. The only

area where the country has demonstrated some improvement is regulatory quality, with scores rising from 2.94 in 2002 to 11 in 2012 (World Bank 2013).

With regard to citizens' perceptions of corruption, nearly 40 per cent of citizens in Afghanistan interviewed within the framework of Transparency International's *Global Corruption Barometer* considered that corruption had increased in the country in the two years preceding the survey.

In addition, the 2012 survey conducted by the United Nations Office on Drugs and Crimes (UNODC) and the Afghanistan High Office of Oversight and Anti-Corruption shows corruption to be one of the main challenges facing the country, next to insecurity and unemployment (UNODC & High Office of Oversight and Anti-Corruption (HOO), 2012).

Corruption is also considered a great problem by the private sector. Approximately 60 per cent of the business community believe that corruption remains a major constraint to their operations, affecting small, medium and large enterprises (World Bank and IFC, 2008).

Nature of corruption challenges

Corruption-related challenges in Afghanistan are a result of a very weak public administration, widespread organised crime activities and the country's dependence on foreign aid (World Bank, 2009) combined with weak enforcement of the law, among other things (Torabi, 2012).

Weak public administration

Corruption, nepotism and cronyism are present at different levels of the government administration (Freedom House, 2013). Members of the government and public officials of all ranks are often selected and promoted on the basis of personal relationships rather than professional qualifications. In addition, the low salaries received by these officials provide incentives for corrupt behaviour (Freedom House, 2013; Monitoring and Evaluation Commission (MEC), 2013). This certainly has an impact on the quality of services provided, but also poses challenges related to integrity and ethics.

The problem is exacerbated by the high tolerance shown by Afghan citizens with regards to bribery and clientelistic practices. According to a survey conducted by UNODC and the High Office of Oversight, almost 70 per cent of Afghan citizens interviewed in 2012 considered it acceptable for public officials to complement their salaries by accepting small bribes. Likewise, more than 65 per cent of citizens surveyed considered it acceptable for a public official to be hired on the basis of family ties (UNODC & HOO, 2012).

In addition, international assistance with regard to service delivery and technical expertise so far have largely substituted for, rather than built, civil service capacity in the country. As a consequence, important skills have not been transferred to Afghan civil servants, and it is uncertain what the consequences will be once donors reduce their assistance and the number of their staff working in the country.

Drug trafficking

Drug trafficking in Afghanistan is a highly lucrative business that has relied heavily on corruption to operate (UNEP, 2013). The drugs trade has contributed to corruption at many levels, including in the judiciary, police, legislature and the executive, with high-ranking government officials allegedly being involved with narcotics traffickers (*The New York Times*, 2008). In 2006, the UNODC had already shed light on the fact that some government agencies at the local and provincial levels had been compromised by drug interests (Shaw, 2006).

There have been some attempts at controlling drug trafficking in the country, but some studies have pointed to the fact that transition and its economic impact could potentially trigger a major new wave of narcotics production (Cordesman, 2012). The World Bank also emphasised that a decrease in aid resources could lead to an increase in reliance on the opium economy and other illicit activities (World Bank, 2012b), which could strengthen the ties between organised criminal groups, law enforcement officials and other public officials, offering even greater opportunities for corruption.

Likewise, economic recession and political instability pose greater risks of state capture, which would allow criminal groups to gain influence in both politics and business (World Bank, 2012).

Aid

Afghanistan largely relies on foreign aid for its reconstruction and peace-building efforts as well as for the provision of public services. Donor aid currently accounts for more than 95 per cent of Afghanistan's GDP (Katzman, 2013).

However, such large flows have involuntarily helped to fuel corruption in the country (Cordesman 2012). The pressure to achieve rapid results puts donors under pressure to spend money quickly (US Senate Committee on Foreign Relations, 2011) without first establishing adequate anti-corruption, transparency and accountability controls. The problem is exacerbated by the government's limited capacity to work effectively and efficiently, and to guarantee that money is well spent.

Scandals such as that involving the Kabul Bank, where several former parliamentarians, cabinet ministers and warlords were allegedly named in the list of recipients of fraudulent loans from the bank (*The Washington Post*, 2011), have helped to shed light on donors' lack of appropriate oversight mechanisms. For instance, the US Foreign Department raised concerns over the opportunities for waste and mismanagement in the relationship with contractors and subcontractors (US Senate Committee on Foreign Relations, 2011).

Moreover, according to the World Bank, while aid has been responsible for much of the progress since 2001, it has also weakened governance and brought a series of problems, such as corruption and a fragmented and parallel delivery system that has been created to circumvent the government's weak absorptive capacity. In fact, aid inflows have become a source of rents, patronage, and political power in more insecure and conflict-affected areas, sometimes even increasing conflict and social divisions (World Bank, 2012b).

With many international troops leaving the country by 2014, it is expected that aid will be reduced significantly. According to experts consulted within the framework of this query, the transition period may reduce opportunities for corruption as the resources available for misuse will decrease considerably (meaning there are fewer opportunities for rent-seekers), and donors will be under less pressure to spend money quickly. Nevertheless, considering the governance capacities of Afghanistan and the lack of accountability, corruption risks are likely to remain a serious challenge to effective aid delivery in the country.

Overview of government sectors most affected by corruption in Afghanistan

Evidence suggests that corruption pervades many of the country's key sectors and institutions (Integrity Watch Afghanistan, 2012). Citizens interviewed within the framework of Transparency International's *Global Corruption Report* reported having paid bribes to access a variety of public services. For instance, more than 65 per cent of those who had contact with the judiciary in the year preceding the survey reported paying bribes. Fifty-eight per cent reported paying bribes in the registry and permit services, 51 per cent to the police and 44 per cent to the tax administration (Transparency International, 2013). The UNODC & the High Office of Oversight corruption survey also points to an increase in people's experience of corruption in the education sector (UNODC & HOO, 2012).

Similarly, according to the World Bank and International Finance Corporation (IFC) 2008 enterprise surveys, the percentage of companies which reported that they were expected to make informal payments or give gifts to public officials "to get things done" is higher than the regional and world averages (41.5 against 37.3 and 25.7 respectively) (World Bank and IFC, 2008).

Studies also show that corruption is rampant in other sectors such as natural resources, including issues related to land grabbing by powerful elites and the management of resources from the country's rich extractive and mining sector, such as oil, gas, coal,

copper and gold, among others (UNEP, 2013).

Moreover, a 2012 report published on corruption in the defence sector also underscores that the sector, mainly due to opaqueness and lack of accountability, is highly susceptible to corruption (Transparency International UK, 2012).

While corruption is a serious problem in many sectors and institutions, at the request of the enquirer this section focuses on the public sector, more precisely analysing public financial management in Afghanistan and its related corruption risks.

Public financial management

As mentioned, Afghanistan's transition phase brings a lot of uncertainties regarding its resource capacities. At the Tokyo conference in 2012, donors committed to continue supporting Afghanistan over the next four years, and there is also a growing commitment to provide support through the country's budget. This approach, however, will require better planning and more efficient execution on the part of the Afghan government.

The extractives and the mining sectors, if exploited in a transparent and accountable manner, are also seen as having great potential to boost domestic revenue. Within this framework, to ensure donors' money and natural resource revenues de facto contribute to the country's development, Afghanistan requires a stronger and more reliable public financial management (PFM) system (World Bank, 2013).

Public financial management in fragile states tends to be weak due to opaque budget processes, lack of qualified personnel and inadequate procurement processes. These pose several corruption risks and have a negative impact on allocation of resources and efficient and effective public service delivery.

Several reforms have been undertaken to improve the budget process, revenue collection and management, external oversight as well as procurement processes in the country. In 2010, the government of Afghanistan presented a three-year plan aimed at improving budget formulation, budget

execution, and transparency and accountability, with the support of donors and investments in capacity building.

However, in spite of recent improvements, Afghanistan still lacks a sound public financial management system. The government still has serious absorptive capacity constraints as well as a lack of qualified personnel. In fact according to recent assessments, unrealistically ambitious budget formulation, large budget carryovers from previous years, rigidities resulting from earmarked donor funding, as well as deteriorating security in parts of the country and limited capacity to implement projects on time, make donor support through the country system risky and challenging (World Bank, 2012a).

Budget

The budget process is key to ensuring the adequate allocation of public resources and efficient service delivery. If the budget process, which includes the allocation of resources as well as the planning and implementation of the budget, is not conducted in a transparent and accountable manner there will be several opportunities for corruption to flourish (Morgner, 2013).

Afghanistan's budget process has passed through a series of reforms during the past years. The country scored 59 out of 100 in the Open Budget Index 2012. This indicates that the government provides some information to the public on budget processes, but that it is still a challenge for citizens to fully hold the government accountable for its management of public resources (International Budget Partnership 2013). The government of Afghanistan makes available to the public some of the key fiscal information, such as the annual budget documentation in-year budget execution reports, as well as year-end reports. However, data on resources used by health clinics and schools are not systematically collected or published (World Bank, 2013).

The 2012 score shows an impressive improvement in terms of the budget information provided by the government in comparison to the 2008 assessment,

when the country scored only 8 out of 100.

According to the Public Expenditure and Accountability assessment, as a result of recent reforms, capacity building and close monitoring of large development programmes, the budget process and execution has improved significantly. The government now has a better ability to deliver public services through the budget, in accordance with initial plans. The budget is much more realistic than it used to be, and its drafting and planning much more inclusive (World Bank, 2013).

In spite of recent improvements, budget execution remains a challenge, with expenditures at around 50 per cent of the budget approved. Low budget execution rates could be due to a series of internal and external factors, such as security issues, late approval of the budget, large budget carryovers, limited understanding of financial management procedures among provincial staff, and lack of capacity in the ministries to follow procurement guidelines, among others (AUSAID, 2011).

According to the World Bank's assessment, the improved planning and implementation of the budget still depends to a great extent on donor-funded technical assistance and operational support. Considering the government's administrative capacity, it is unlikely that in the coming year, when a rise in on-budget aid is expected, the Afghan government will manage to plan and execute the budget without policy advice and operational support. Therefore, international cooperation will remain critical in the coming years (World Bank, 2013).

Procurement

Procurement is one of the areas in the public administration most prone to corruption. In Afghanistan, the weak capacity of the government makes it a particularly vulnerable area.

A new procurement law aimed at improving procurement processes in the country is currently being discussed among government experts. The Presidential Decree 45 brings provisions aimed at reducing corruption opportunities and increasing transparency. These include, for instance, provisions

prohibiting government agencies from signing contracts with high-ranking government officials and their associates (MEC, 2013).

In addition, the Decree 45 also requires government agencies to publish all contracts online, a measure that has been partially fulfilled by concerned agencies. The majority of contracts published, however, do not include all the information required by the decree (MEC, 2013).

Given the importance of the natural resources sector, a specific article deals with mining contracts; these should follow international principles of transparency and be published in detail online. According to MEC's assessment, more than 200 mining contracts have been published; however, the most important mining contract signed so far (Aynak) has not yet been made available to the public (MEC, 2013).

Revenue collection and management

As part of the government's efforts to increase public revenue, several tax and customs reforms have been undertaken since 2008, including the simplification of procedures and the creation of one-stop shops. The tax legal framework has improved significantly; however, tax authorities still enjoy wide discretionary powers when enforcing the law (World Bank, 2013), increasing the opportunity for corruption and rent-seeking behaviour.

The Presidential Decree 45 also includes provisions aimed at improving the revenue capacity and reducing its misuse, but it remains to be seen how tax agencies and customs will implement these recommendations (MEC, 2013).

External audit and public oversight

The Supreme Audit Office is responsible for conducting the external audit. A new law granting greater independence and autonomy to the institution was approved in March 2013. The law also underscores that audits must be conducted in line with international standards (of the International Organisation of Supreme Audit Institutions (INTOSAI)) and audit reports must be published. Shortcomings of the law include the selection of the auditor general, which is under the responsibility of the president, as well as the lack of guarantee

regarding his or her removal (World Bank, 2013).

2 GOVERNANCE STRUCTURE AND ANTI-CORRUPTION EFFORTS IN AFGHANISTAN

Overview of anti-corruption efforts

The government of Afghanistan has been under strong pressure from the international community to fight corruption in the country. Several initiatives and reforms have been undertaken, but so far the international community is sceptical about the results achieved (Torabi, 2012).

The government, with support from donors, has been implementing reforms in several areas that would ultimately have an impact on corruption. Among its efforts, the government adopted the 2008-2013 Afghanistan National Development Strategy. According to the strategy, anti-corruption efforts should focus on the following: (i) enhancing government anti-corruption commitment and leadership; (ii) raising awareness of corruption and evaluating the effectiveness of anti-corruption measures; (iii) mainstreaming anti-corruption into government reforms and national development; and (iv) strengthening the legal framework for fighting corruption, while building institutional capacity for effective implementation of the United Nations Convention against Corruption (UNCAC).

As mentioned, important reforms in the budget process and procurement have been undertaken with the aim of making public spending more transparent. In addition, reforms to simplify public services procedures, such as registration and licensing, have been undertaken, reducing civil servants' discretionary power. The government is also seeking to establish a competitive hiring process in the public sector in an attempt to address the influence of patronage (Torabi, 2012). The government has also demonstrated willingness to comply with the Extractive Industry Transparency Initiative (EITI) requirements, which could be a step forward in reducing corruption risks in the mining sector (RUSI et al., 2011; EITI, 2012).

As mentioned above, in July 2012 the government enacted a detailed anti-corruption decree, which includes provisions related to the recruitment of civil servants, procurement processes, the publication of contracts as well as the operations of law enforcement agencies, among others. The decree specifies a deadline for government agencies to fulfil their obligations, and the failure to do so could result in prosecution. However, it is unclear how cases have been prosecuted due to failure to meet the deadline of the Decree.

Despite the Decree's enactment, and as previously mentioned, the country still lacks a proper system of checks and balances and there are still doubts about the genuine political commitment of high-ranking officials to curbing corruption (Gardizi et al., 2010). In fact, the government's ability to drive the country towards good governance is very modest, as it relies heavily on clientelistic and personal relationships (Bertelsmann Foundation, 2012). Improvements need to be made with regards to coordination on anti-corruption activities among different ministries, offices, and donors, including those on capacity building and independence of anti-corruption and law enforcement institutions.

Legal framework

International conventions

Afghanistan ratified the United Nations Convention against Corruption (UNCAC) in 2007. The country is also part of the United Nations Convention against Transnational Organized Crime.

National legislation

The Afghan penal code criminalises active and passive bribery and states that corruption is a serious criminal act (US Department of State, 2013).

The Constitution (Article 154) establishes that the president, vice-president, ministers, the attorney general and judges have to declare their assets, including information on personal and business

assets, bonds, shares, stocks, sources of income, and positions held in for-profit or non-profit entities. The Law on Fighting Corruption extends this obligation to deputy ministers, directors, members of the national assembly, provincial and district councils, members of independent commissions and bodies, governors, military and police officers, prosecutors, procurement officials and auditors, as well as all high-ranking civil servants. Assets and incomes of officials' spouses, children and dependants also have to be declared. This means a very large number of people (more than 1,000) must declare their assets, which certainly poses resource and capacity challenges to effective implementation and oversight (Martini, 2013).

According to the Regulation on Campaign Finance Disclosure Law 2009 and the Political Parties Law, donations from legal entities to both political parties and individual candidates are prohibited, and only natural persons are allowed to make donations to parties and candidates (of up to two million Afghani per year – approximately 25000USD) (International IDEA, 2012). Candidates can also rely on public subsidies during elections, and are also required to report on their campaign expenditures to the Electoral Commission, which in turn should make these reports available to the public (International IDEA, 2012).

Afghanistan does not have a law on access to public information. According to Integrity Watch Afghanistan, as of February 2013 a draft law, which would still present a few shortcomings, was being considered by the government, but has not yet been approved (Integrity Watch Afghanistan, 2013; Centre for Law and Democracy, 2013).

Institutional framework

There are several institutions in the country tasked with investigating wrongdoings and fighting corruption. However, many of these institutions seem to lack the necessary political will and/or suffer from political influence, rendering them unable to perform their duties efficiently.

High Office of Oversight and Anti-Corruption

The [High Office of Oversight and Anti-Corruption](#) (HOO) is responsible for overseeing and coordinating the country's anti-corruption efforts. The office is also responsible for investigating corruption cases, which then should be referred to the Attorney General's Office, and for overseeing asset declarations through a dedicated unit. The HOO substituted the former lead agency against corruption, the General Independent Administration of Corruption. However, some observers argue that the new office inherited many of the structural problems of its predecessor, including a lack of qualified personnel and of the political will to fight corruption.

Attorney General's Office

The [Attorney General's Office](#) is responsible for monitoring, investigating and prosecuting corruption through a special anti-corruption unit created in 2006.

However, the office is not particularly efficient in charging individuals involved in corruption. The majority of cases filed are of low-level corruption, and high-ranking government officials are rarely challenged (International Crisis Group, 2010).

In addition, several prosecutors are themselves accused of being involved in corruption and abuse of office (MEC, 2013). According to a study conducted by the International Crisis Group, prosecutors may also accept bribes for not offering charges or not appealing court decisions (International Crisis Group, 2010).

The Presidential Decree 45 aims to enhance the integrity and effectiveness of prosecutions by creating a surveillance department to monitor the activities of prosecutors. In addition, the Attorney General's Office is expected to identify wrongdoings and report these to the President's Office. Yet, according to MEC's assessment, the implementation of these measures is rather inadequate (MEC, 2013).

Judiciary

Corruption in the judiciary has been fuelling impunity in the country. The weak enforcement of the law is

considered one of the main problems, allowing public officials, companies and politicians to remain unpunished and to repeatedly engage in corruption.

The judiciary is perceived as being the most corrupt institution in the country (Transparency International, 2013; Integrity Watch Afghanistan, 2012). Judges and prosecutors allegedly accept bribes to not process cases, to decide in favour of one of the parties, release detainees or disappear with evidence (Chêne, 2007). Administrative corruption in the justice sector is rampant, particularly due to low salaries and a shortage of human and material resources. Both judges and prosecutors do not always have adequate and required training. In fact, according to the International Crisis Group report, in 2007 approximately 47 per cent of judges did not hold a bachelor's degree or equivalent. The same holds true for prosecutors. In some provinces only three out of eight prosecutors had bachelor's degrees (International Crisis Group, 2010).

The judiciary is also affected by undue influence exerted by many local actors. Judges and prosecutors have highlighted the challenges they face in standing as an independent institution, either because of political interference or pressure and threats from warlords, local powerbrokers and organised crime groups.

As part of a series of reforms aimed at fighting corruption, the government established in 2008 a special Anti-Corruption Tribunal within the Supreme Court, with the aim of expediting the judicial process of high-level corruption cases (HOO, 2012).

One of the articles of the Presidential Decree 45 requires the Supreme Court to reduce the backlog of cases, particularly of those related to corruption. The Supreme Court identified more than 17,000 open cases, of which 475 were corruption cases (MEC, 2013). According to MEC's assessment, after eight months of the enactment of the Decree, the Supreme Court had managed to reduce the number of open cases to 10,000. However, the effective processing of cases is being hampered by political influence. For instance, in cases of land usurpation, which is considered a serious problem in the country, the

alleged offenders belong to the land mafia and are government officials (or are related to them) (MEC, 2013).

Office of Administrative Affairs

The Office of Administrative Affairs (OAA) is responsible for monitoring the implementation of the Presidential Decree 45. However, the OAA has already indicated that it lacks the capacity to verify the accuracy of the reports submitted. Moreover, it has stated that due to security reasons it is not able to evaluate the implementation of the Decree in remote areas. To date, the reports submitted to the OAA by ministries and government agencies, and the evaluation assessments of these, are not available to the public (MEC, 2013).

Monitoring and Evaluation Commission

In 2011, the Monitoring and Evaluation Committee (MEC) was established as part of the commitments agreed between the Afghan government and the international community to fight corruption. The MEC, which is composed of Afghans and members of the international community, is responsible for developing clear and objective benchmarks for measuring progress in the fight against corruption, as well as for preparing periodic reports on national and international activity.

In November 2012, the MEC released an in-depth public inquiry to examine the events leading to the Kabul Bank crisis. A set of recommendations to improve governance in the financial sector have been issued.

The MEC is also conducting an independent evaluation of the implementation of the Presidential Decree 45. The commission, however, underscores several challenges in conducting this assessment, particularly due to a lack of cooperation of the HOO and the OAA.

Other actors

Media

The 2009 Mass Media Law guarantees freedom of speech and of the press, and prohibits censorship (Freedom House, 2013). While the press is assessed by Freedom House (2013) as “not free”, the organisation recognises that there was a great improvement during the year 2012. Journalists and the media in general had more freedom to report on sensitive issues such as human rights and corruption. The number of journalists arrested also decreased significantly (Freedom House, 2013).

Consequently, Afghanistan improved its rank in the 2013 Reporters without Borders Press Freedom Index, from 150 in 2011-2012 to 128 out of 179 in 2013.

Nevertheless, censorship is still exercised, particularly with regard to religious content. The government also censors internet content – although internet penetration in the country is rather low due to low literacy rates (five per cent of Afghans had access to the internet in 2012). Also for this reason, radios are the most important communication vehicle in the country, followed by television (Freedom House, 2013). The state channels are seen as reluctant to feature content about corrupt practices, and private media often suffers from the influence of powerful local interests (USAID, 2009).

Civil society

The right to association is guaranteed by the Afghan Constitution. There are more than 1,700 national and international non-governmental organisations operating in Afghanistan on a wide variety of issues and sectors. A new law on social organisations, which regulates the activities of domestic and foreign non-governmental organisations in the country, was approved in September 2013 (The International Center for Not-for Profit Law, 2013), and formally the operation of these organisations is not constrained by the government (Freedom House, 2012).

However, these NGOs face several challenges

related to the security situation in the country, especially those operating in more remote areas. Members of organisations working on corruption and human rights issues are likely to face threats and harassment (Freedom House, 2013).

In general, civil society organisations in Afghanistan have been created to deliver services and provide support to specific groups (for example, women and minorities), meaning that they focus less on issues such as transparency, accountability and corruption (USAID, 2009). Nevertheless, some non-governmental organisations, such as Integrity Watch Afghanistan, are working on promoting transparency and accountability through community-based monitoring programmes and tracking of budget expenditures, as well as other research and advocacy initiatives.

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