

Chapter 7

Recommendations

Analytical contributions are provided in this report on tackling IFFs at the multilateral, regional and domestic levels in Africa. Addressing this topic falls within the mandate of UNCTAD and reflects its history as the institution that was first established to promote fairer rules of engagement in international trade for exporters of primary commodities. This is important to underline, setting out on the road to the fifteenth session of the United Nations Conference on Trade and Development in Barbados.

10-POINT PLAN FOR TACKLING IFFs IN AFRICA



SOCIAL



ECONOMIC

- Engage on IFFs and ethics
- Protect civil society, whistle-blowers and journalists

- Devote more resources to the recovery of stolen assets
- Strengthen African engagement in international taxation reform
- Intensify the fight against corruption and money-laundering

2030 Agenda for Sustainable Development

- Strengthen domestic regulatory frameworks
- Rekindle trust in multilateralism to fight IFFs
- Invest in data infrastructure and transparency

- Engage MNEs on taxation and sustainable development
- Invest in research on IFFs and climate change



INSTITUTIONS



ENVIRONMENT

Analytically, the main focus of the report has been on understanding the breadth of channels and mechanisms through which IFFs are conducted and how they affect sustainable development in Africa. In this chapter, recommendations are made for the multilateral community and for African Governments. The recommendations build on the landmark Mbeki report (UNECA, 2015) and aim at contributing to global efforts to address key issues highlighted in the recent General Assembly resolution, on the promotion of international cooperation to combat IFFs, and strengthening good practices on the return of assets to foster sustainable development and the achievement of the 2030 Agenda for Sustainable Development.

7.1 Main findings

Critically, in the report, it is argued that IFFs are a shared responsibility between developed and developing countries, at the core of multilateralism. Illicit financial flows appear to be large, but irrespective of their scale, they need to be tackled as a significant impediment to the economic development of Africa. High levels of illicit financial flows, as shown by the prevalence of misinvoicing and capital flight, indicate that many African Governments do not benefit from a significant portion of their international trade transactions and experience significant losses in capital and foreign exchange. Key stylized facts, resulting from the models developed in this report, include:

- In Africa, IFFs linked to the export of primary extractive resources were estimated as being as high as \$40 billion in 2015 and \$278 billion (cumulative) over the past decade. This is a conservative estimate and should be taken as a lower bound (chapter 2).
- In Africa, on average, extractive export underinvoicing is equivalent to 16 per cent of merchandise exports of the commodities covered in this report (chapter 2).
- Generally, commodities show a similar pattern across countries: at 77 per cent, gold is the largest contributor in total African extractive export underinvoicing, and other precious metals, such as platinum (6 per cent) and diamonds (12 per cent), are also persistent positive contributors (chapter 2).
- Capital flight, which captures trade misinvoicing and other balance-of-payment transactions, was estimated at \$88.6 billion, on average, during 2013–2015 or around 3.7 per cent of African GDP. Capital flight between 2000–2015 was

\$836 billion or 2.6 per cent of GDP. In terms of capital flight, the largest positive absolute outliers are Nigeria (\$41 billion), Egypt (\$17.5 billion) and South Africa (\$14.1 billion), on average, during 2013–2015.

- IFFs are negatively associated with target 8.2, on achieving higher levels of economic productivity. As indicated by the econometric analysis in chapter 5, labour productivity, as an indicator for productive capacity, is inversely related to IFFs. This suggests that an increase in illicit financial flows is decreasing domestic productive capacity. The effect is likely however to be low in Africa due to the continent's relatively low productive growth.
- As IFFs were found to be negatively correlated to poor financial sector regulation, improvement in the latter could stimulate productivity growth. It could also reduce capital outflow through stronger compliance with the Financial Action Task Force and capacity to track financial flows.
- Curbing IFFs is an avenue for improved prospects for environmental, social and economic development in Africa. The impact of IFFs on environmental sustainability has hardly been assessed in the literature, although environmental damage in the extractives sector is a major concern. Countries with high IFFs may be more vulnerable to climate change and appear to have the lowest ability to leverage investments for health, education and climate change mitigation.
- Public expenditure reductions potentially have unequal impacts on gender, especially if cuts affect health and education expenditures. A negative impact of IFFs is prevalent where tax evasion affects the allocation of scarce government funds and reduces fiscal expenditure on public services where women and youth are the majority beneficiaries.

7.2 Strengthen African engagement in international taxation reform

Aim for an intergovernmental African position on Organization for Economic Cooperation and Development/Group of 20 proposals

African countries should aim for an intergovernmental position to be reflected given the current momentum for international taxation reforms. The negotiations on the second wave of the OECD secretariat proposals on the BEPS initiative, labelled pillar one and

pillar two, began in early 2019 and are planned to be held through multiple meetings until the end of 2020. In effect, though the consultation process is inclusive, as of March 2020, there were no official statements on an intergovernmental African position on the negotiation of the Inclusive Framework, raising questions about the extent of engagement of the African members in the Inclusive Framework.

The proposal for a unified approach under pillar one primarily focuses on the reallocation of taxing rights to market jurisdictions. On scope, the document explicitly states that “the approach covers highly digital business models but goes wider – broadly focusing on consumer-facing businesses with further work to be carried out on scope and carve-outs. Extractive industries are assumed to be out of the scope” (OECD, 2019d: 5). The proposal further reiterates that sectors “such as commodities and extractives” (labelled as such) would be carved out (OECD, 2019d: 7). While acknowledging the need for an “administrable” simplification of the arm’s length principle, especially for emerging and developing countries, the proposal also stipulates that “it would retain the current rules based on the arm’s length principle in cases where they are widely regarded as working as intended, but would introduce formula-based solutions in situations where tensions have increased – notably because of the digitalization of the economy” (OECD, 2019d: 6). The pillar two proposal, titled Global Anti-Base Erosion Proposal, focuses on tax challenges arising from the digitalization of the economy (OECD, 2019e).

As they stand, with their focus on tax and digitalization, these proposals do not sufficiently address the specific loopholes that limit the taxation rights of African countries. This point is also corroborated by the Independent Commission for the Reform of International Corporate Taxation for developing countries at large.⁸⁹ The gaps in the OECD proposals underline the urgency of strong political leadership from Africa on international taxation reforms.

Increase space for other multilateral engagement and alternative views

Unless the underlying distribution of taxing rights is addressed, African countries will continue to be vulnerable to significant revenue losses. African interests must be defended in spaces where the concerns of countries are fully heard and where alternative and substantiated views on international corporate taxation can be elaborated. As shown in the report, the dichotomy that arises from the location of real economic activity and of permanent establishment status lies at the core of the perceived injustices. At the global level, it could be argued that only the United Nations, with its near universal

⁸⁹ See <https://www.icrict.com/press-release/2020/2/13/the-oecd-proposed-reform-will-fail-to-generate-meaningful-additional-tax-revenue-especially-for-developing-countries>.

membership and democratic structure, can provide a truly global tax body (Independent Commission for the Reform of International Corporate Taxation, 2018). Reflecting these concerns, as of March 2020, OECD proposals did not fully address the priorities of African countries. Other spaces where taxation issues are discussed include the Platform for Collaboration on Tax, a joint effort of the IMF, World Bank, OECD and the United Nations, and in academic research undertaken by entities supporting the interests of developing countries.

Africa's voice in these spaces is carried by ATAF. From 25 members at the time of its creation in 2009 to 38 members in November 2019, ATAF has increasingly gained legitimacy and capacity in defending African interests on taxation issues. Building on the expertise of ATAF representatives, political leadership at the highest level is needed to take Africa's multilateral engagement on proposals for international reforms to the next level. African academic institutions should receive greater support in developing Africa-based taxation expertise and data-sharing initiatives, such as that initiated by the multi-disciplinary team of the Committee on Fiscal Studies.⁹⁰ Ezenagu (2019), for instance, puts forward proposals for taxation reforms that would be more appropriate to the administrative capacity of African countries.

Finally, concerns that parallel negotiations on trade in digital services at WTO, where African countries are more united, may constrain their taxing rights (James, 2019) warrant further research and feature on a new agenda on international trade and taxation issues.

Review tax treaties and aim for more taxing rights

Countries should avoid signing tax treaties that impinge greatly on taxing rights. Tax treaties that include anti-abuse clauses make tax avoidance through treaty shopping harder. For example, withholding taxes is a strong frontline protection against profit-shifting for countries with limited administrative capacity (see chapter 3 and Hearson, forthcoming). In this regard, countries should not accept having them lowered to a very large degree by tax treaties. Similarly, tax treaties often exempt some types of income earned in the source State from taxation in that State altogether (see, for example, chapter 4, box 4, on tax dispute on capital gains). Countries should assess the costs of removing these taxing rights against the expected benefits in FDI attraction. Current evidence does not support the argument on expected benefits in FDI attraction (chapter 4). In this regard, it is recommended that African countries keep and expand their taxing rights.

⁹⁰ See <https://cfs.uonbi.ac.ke/>.

Countries are best protected by a combination of specific anti-abuse rules, applying to individual treaty clauses, and a general anti-abuse rule, covering the whole treaty, along with an anti-avoidance rule in domestic law. Such clauses are becoming increasingly common and are now found in the main model treaties used for negotiations (chapter 4).

Considering the continent's revenue losses to tax havens and secrecy-based jurisdictions (chapter 3), African countries should be among those leading the charge to pressure tax havens to sign treaties with all countries. Progress on this is critical, taking account of the evidence that tax havens complied with the minimum number of tax treaties by signing many treaties among themselves (Zucman, 2014). Zucman's findings further suggest that the signing of bilateral treaties providing for exchange of bank information led to a relocation of bank deposits between tax havens rather than to significant repatriations of funds, concluding that "the least compliant havens have attracted new clients, while the most compliant ones have lost some, leaving roughly unchanged the total amount of wealth managed offshore".

Make tax competition consistent with protocols of the African Continental Free Trade Area

In addition to such engagement, African countries need to incorporate international taxation matters in relevant regional and continental initiatives. Without a harmonized taxation system at the continental level, African countries should aim at defining ways to curtail tax competition. Related efforts should include context-based analytical assessments of the welfare effects of falling headline tax rates and the proliferation of tax incentives across the continent and leverage the AfCFTA as a platform to avoid a race to the bottom. UNCTAD continues provision of technical assistance, in the context of ongoing and forthcoming negotiations on phase 2 of the AfCFTA on investment, competition and intellectual property rights.

More critically, African countries should build on the formidable negotiations forum that the continent has established in the context of AfCFTA. For now, the governance mechanisms of negotiations include senior officials of trade ministries and ministers of trade. There should be mechanisms to bridge the gap between these trade-focused groups, ministers of finance and the High-Level Panel on Illicit Financial Flows, while considering negotiations on phase 2. These include the protocols on investment, competition and intellectual property rights. There are also proposals either to give ATAF an intergovernmental dimension or, as argued by other authors, for the creation of an African tax body (Ezenagu, 2019).

7.3 Intensify the fight against corruption and money-laundering

Support and scale up African anti-money-laundering initiatives

In addition to being party to global level initiatives and subject to third-party legislation on corruption and money-laundering, African countries should collectively intensify initiatives to fight these problems on the continent. In this regard, good practices, such as those of the Intergovernmental Action Group against Money-Laundering in West Africa, should be supported and further developed. Initially created by the Economic Community of West African States in 2000 to combat the financing of terrorist groups, over the years, the Intergovernmental Action Group has provided assessment and capacity-building on anti-money-laundering and counter-financing of terrorism of countries located in the region. The initiative has improved countries' capacity to identify suspicious transactions related to anti-money-laundering. However, performance varies greatly across countries, with some countries showing worse results than in previous years. In addition, assessment reports show that successful records of financial intelligence units of tracking suspicious transactions are poorly matched by adequate action of investigative authorities (Intergovernmental Action Group against Money-Laundering in West Africa, 2014; *ibid.*, 2018). This highlights the need for all African countries to strengthen their capacity to track suspicious transactions and ensure that the latter are properly investigated.

In the same vein, the African Peer Review Mechanism – a voluntary self-monitoring mechanism for African Union member states – should be given a clear mandate to devise binding legislative tools to address matters related to corruption and money-laundering. In addition to cross border movements of funding, the increase in the prevalence of real-estate transactions in money-laundering methods in West Africa (Intergovernmental Action Group against Money-Laundering in West Africa, 2018), for instance, warrants greater capacity in identifying and regulating specific characteristics of anti-money-laundering at the continental level.

7.4 Invest in data infrastructure and transparency (including gendered data)

Good data play a critical role in allowing an effective fight against IFFs. The vast literature on profit-shifting by MNEs of the United States, for example, is due to United States

data being particularly good (Zucman, 2019). As custodian agencies of Sustainable Development Goal indicator 16.4.1 (total value of inward and outward IFFs, in current United States dollars), UNODC and UNCTAD are leading the work to develop a statistical methodology and a measurement standard to estimate IFFs. This will be critical to developing a set of methodological guidelines that can be used at the national and international levels to estimate the total value specified by the indicator. In the context of analysing the impact of IFFs on African communities and the Sustainable Development Goals, more and better data on gender in financial services, trade, employment and taxation are required to generate new insights to inform policy interventions on the economic, social and environmental pillars of sustainable development.

Collect better and greater trade data

Alleviation of trade misinvoicing in African countries will require better trade data, including where appropriate at the gender-disaggregated level, for risk-exposure analysis and enhanced regional cooperation on common reporting standards for firm-level tax and commercial information. Critically, there needs to be a greater exchange of information on trade data with trade partners to identify anomalies and discrepancies that warrant further investigation. The analysis in chapter 2 aimed at the detection of systemic customs fraud linked to the export of primary extractive resources shows that, while the analysis of macro trade data can be a useful indicator, it has its limitations. Such limitations can be addressed with better access to and use of transaction-level trade data. This could be done through several platforms, including the UNCTAD Mineral Output Statistical Evaluation System.⁹¹ This platform has already shown its beneficial results at the domestic level. In the case of Zambia, for example, the System allows for mineral value chain monitoring of the country's mineral exports. It includes a mineral production reporting and export permit tool, which allows companies to submit their mandatory monthly production export and request export permits online. This replaces the manual process which required companies to travel to Lusaka. Since its implementation in 2017, the Mineral Output Statistical Evaluation System delivered the following for the Government of Zambia:

- Revenue recuperation due to the System audits reached around \$910,000 (since 2018).
- Grading of minerals is more accurate.
- Zambia started collecting non-mineral-related royalties.

⁹¹ See <https://asycuda.org/wp-content/uploads/ASYCUDA-Value-Chain-Monitoring-Case-Study-Zambia.pdf>.

- Penalties collected have reached more than \$50,000 (since 2018).
- Export permits increased 66 per cent after implementation of the System.

Governments with access to transaction-level trade data can also implement a price-filter analysis. The price-filter analysis relies on a single country's transaction-level data by product and compares the value/price on a customs invoice to past prices or the free market price, to distinguish between normal and abnormal pricing (Carbonnier and Mehrotra, 2019). Though both the partner-country trade gap and price filter methods have their flaws, they can be useful and intuitive tools for customs fraud detection. Global Financial Integrity has also developed its "GFTrade" tool based on the interquartile range price filter method, which provides direct feedback to customs officials. Prototype software based on blockchain technology is also being developed to provide transparency of global trade logistics and global value chains (McDaniel and Norberg, 2019) from which Africa may usefully benefit in tackling trade misinvoicing. African countries should also look to leverage the provisions of article 12 of the WTO Agreement on Trade Facilitation⁹² to improve the exchange of trade data to better monitor IFFs.

Accelerate progress on tax reporting

African Governments should explore innovative means of utilizing voluntary tax reporting, for revenue mobilization purposes, and strengthen related initiatives. In this regard, increased goodwill of MNEs to voluntarily publish their tax data for global reporting initiatives should be matched by similar enthusiasm for public country-by-country reporting (Tax Justice Network, 2020).

7.5 Strengthen regulatory frameworks at the domestic level through a multi-track approach

Design a specific policy and regulatory framework on illicit financial flows

The prevalence of IFFs in Africa and the diversity in their origins, mechanisms and impact are such that countries should have their own national policy framework for combating these flows. Such a framework should include a full assessment of existing policies and legislation across countries.

In addition, countries should strengthen the set of standard legislations and regulatory measures of relevance to IFFs. These should also include strengthening of local judiciary

⁹² See <https://www.tfafacility.org/article-12>.

systems, increase capacity for dispute resolution and consider adoption of UNCTAD reforms on international investment agreements (UNCTAD, 2018).

Domesticate the African Mining Vision

The AMV was adopted by the African Union in 2009 to promote equitable, broad-based development through prudent exploitation and utilization of the continent's mineral wealth. The AMV aims at setting the path to broad-based sustainable growth and socioeconomic development, including through the adoption of global norms for the equitable governance of the natural resources sector. Its objectives are far-reaching and actions of intervention are spread across six major areas, namely: improving the quality of geological data, as a bargaining tool for fairer deals and more equitable returns on mining investments; contract negotiation capacity; resource governance; management of mineral wealth; tackling infrastructure constraints; and recognizing the developmental role of artisanal and small-scale mining.

Considering the comprehensive coverage of the AMV, countries should use existing guidelines to enact policies and regulations aimed at its implementation (UNECA, 2014). The expectations of mineral-rich countries in Africa on development benefits from the extractive sector are justified by its status as a key generator of export revenues and foreign exchange in mineral-exporting economies. To fulfil these expectations and considering the magnitude of the extractive sector as a source of IFFs, African countries should build on lessons learned from past engagement on international commodity governance (chapter 4).

Establish cross-institutional collaboration

The multi-dimensional nature of IFFs requires coordinated multi-institutional actions at the domestic level. In this regard, a combination of interministerial actions and strengthening of lead institutions in the fight against tax avoidance, money-laundering and other crimes is needed. On interministerial actions, in Nigeria, for example, the interministerial committee on anti-money-laundering is co-chaired by the ministers of finance, justice and interior, to fulfil its mandate of national cooperation and coordination of other national stakeholders (Intergovernmental Action Group against Money-Laundering in West Africa, 2018). As part of this cross-institutional collaboration, a pre-evaluation workshop gathered more than 20 agencies, including regulators, tax authorities, financial and non-financial institutions.

Efforts to invest in strengthening the capacity of the range of domestic institutions involved in monitoring, identifying and regulating IFFs should be supported. National

financial intelligence units are public agencies that play a central role as receivers of notifications about large and/or suspicious transactions. They analyse and forward them to law enforcement bodies, where appropriate. Tax authorities should have the capacity to scrutinize company contracts and accounts and tax declarations, identify accurate product prices and combat abusive practices. Customs authorities are responsible for monitoring and evaluating the veracity of export and import prices and quantities, while judicial authorities are responsible for law enforcement. Designing policies and laws to combat IFFs is the responsibility of policymakers. This underscores the importance of supporting institutional capacity-building across all levels of national authorities in Africa.

More specifically, in many African countries, tax authorities are in urgent need of additional resources and capacity-building activities and training. They are understaffed and lack the required expertise. For example, in a survey of Nigeria, 62 per cent of firms expressed concern with the lack of knowledge of tax authorities during audits (AndersenTax, 2019). To build its domestic capacity in revenue collection, an issue for many African countries, as shown in chapter 4, the Government of the United Republic of Tanzania, for example, invested resources in auditing capacity after a decade of private investment in the mining sector and persistently low revenue collection. It created the Tanzania Mineral Audit Agency as an autonomous agency under its Ministry of Energy and Minerals in 2009. The Agency is responsible for monitoring the quality and quantity of minerals that mining companies produce and export, and for conducting financial audits. Owing to sufficient funding and staffing, including tax experts, environmental scientists, information technology analysts, engineers and gemmologists, the Tanzania Mineral Audit Agency has been successful in financial auditing and addressing transfer pricing. Thanks to the effective cooperation between the Tanzania Revenue Authority and the Tanzania Mineral Audit Agency, tax authorities collected an additional \$65 million in corporate income tax between 2009 and 2015, accounting for about 7 per cent of mining tax receipts in that period (Redhead, 2017).

7.6 Devote more resources to the recovery of stolen assets

The slow pace of progress on the recovery of stolen assets emphasizes the need for greater capacity at the domestic and international levels to quicken the pace for recovery in the context of the Decade for Action. In this regard, the international

community should provide greater support to initiatives, such as StAR of the World Bank–UNODC, in efforts to offer practical advice on the strategy and management of asset recovery efforts. The multilateral nature of the organizations leading the project makes it an appropriate platform for dialogue and collaboration on specific cases as they often involve different jurisdictions, spanning developed and developing countries.

7.7 Protect and support civil society organizations, whistle-blowers and investigative journalists

Civil society organizations, whistle-blowers and investigative journalists have played a critical role in revealing the magnitude of IFFs and the mechanisms that support them in Africa and beyond. As part of this chain of actors, transparency initiatives must be encouraged and supported, including in their use of new technologies. In the United Republic of Tanzania, for example, Jamii Forums is a news and social networking platform for whistle-blowing and has exposed several national corruption scandals. It has more than 3 million Facebook followers and, as of 2015, had 28 million mobile subscribers.⁹³ In Kenya, the Action for Transparency application, produced by Transparency International–Kenya, provides information on money promised for school and hospital funding versus money actually disbursed.⁹⁴

At the global level, organizations such as Open Ownership and the Financial Transparency Coalition work on ending secrecy legislation that is holding back full beneficial ownership transparency. In addition to the central leading role played by ATAF on taxation issues, other organizations such as the Tax Justice Network–Africa also provide capacity-building initiatives. For instance, in 2015 the Tax Justice Network successfully campaigned for renegotiating the tax treaty of Zambia with Ireland and the Netherlands to include anti-abuse provisions. Similarly, Action Aid and partners have been vigorously supporting campaigners in Malawi in their fight against existing tax treaties, which made use of the country's weak taxation frameworks, with loopholes that offered ample opportunities for tax avoidance.⁹⁵

Whistle-blowing comes with enormous risks, but as it can serve the public interest, it should be protected by law. For instance, in October 2019, the Council of Ministers of the European Union adopted new rules to ensure that member countries change domestic laws to protect insiders who report on misconduct. The impact of the Panama papers

⁹³ See <https://thelawmarket.com/anti-corruption-and-anti-bribery-apps-2dc578efad6e>.

⁹⁴ See <https://actionfortransparency.org/>.

⁹⁵ See <https://mwnation.com/treasury-reviewing-double-taxation-pacts/>.

on the design of legislation illustrates the powerful reach of whistle-blowing. Following the press revelations, many countries, including Australia and France, for example, established parliamentary commissions to consider actions to tackle tax evasion. Some of these measures were the catalysts for legislative change on multinational anti-avoidance laws. It is estimated, for instance, that, as a result, AU\$7 billion a year in sales by 44 MNEs will be returned to Australia.⁹⁶

7.8 Build bridges between multinational enterprises, taxation and the 2030 Agenda for Sustainable Development

Curbing illicit financial flows for structural transformation

African countries should communicate to all actors, including MNEs, the primacy of the role that curbing IFFs would play in the financing of sustainable development on the continent (chapter 5). In addition, Governments and MNEs should focus on constructive engagement with a view to eliminating tax evasion and curbing tax avoidance. Doing so is likely to help addressing the effects of IFFs on economic, political and social stability in Africa and beyond (introduction and chapter 1).

Include taxation... in environmental, social and governance reporting

The review of the international corporate taxation regime and of the associated theoretical economic literature on MNEs and transfer pricing provides justification that they provide for developmentally harmful tax practices among MNEs (chapter 3). Furthermore, international guiding principles for better practices are soft laws and not legally binding, while domestic regulatory systems are insufficiently developed. As a result, African countries have become dependent on mining contracts and case-specific community development agreements (chapter 4). Considering increasing interest in sustainability issues among private sector stakeholders, African countries should build on the rise in environmental, social and governance reporting to identify links between these reporting mechanisms and the objectives of curbing IFFs for sustainable development. Progress in the Sustainable Stock Exchanges Initiative shows that there is an increasing number of stock exchanges mandating environmental, social and governance disclosure for listed companies, which provides good grounds for pioneering greater consideration

⁹⁶ See www.theguardian.com/australia-news/2019/apr/05/tax-office-may-apply-40-tax-against-multinationals-for-diverting-profits.

of taxation components.⁹⁷ In this regard, efforts to strengthen the capacities of Governments to measure and monitor private-sector contribution to the 2030 Agenda for Sustainable Development should be encouraged. Examples of such efforts include an UNCTAD project on enabling policy frameworks for enterprise sustainability and Sustainable Development Goal reporting in Africa and Latin America.⁹⁸ Other examples include transparency pacts between Governments and the private sector, such as Publish What You Pay.⁹⁹

Pioneering of the inclusion of taxation in environmental, social and governance reporting should be done with recognition of the mixed performance of private-sector engagement in sustainability initiatives. Key business analysts, recognize, for example, that neither the 2008 crisis nor corporate social responsibility nor sustainability initiatives have changed the current status quo of a world “where people and the planet are in the service of business. Business, in turn, is in the service of finance, and finance is primarily in the service of itself” (Saïd Business School, 2019).

7.9 Invest in research to account for links between illicit financial flows, environmental sustainability and climate change

The review of sources of IFFs highlights the magnitude of environmentally harmful activities, such as illegal logging, illegal fishing, illegal mining and illegal waste trafficking (chapter 1). Similarly, as shown in the report’s empirical analysis (chapter 5), negative externalities from the extractive industry not only have ripple effects on other sectors, such as agriculture, but also affect critical water resources at the community level. However, challenges related to the dominant features of established economic models of structural transformation and data constraints make it difficult to establish causality links in econometric models on IFFs and sustainable development.

In light of these findings, there should be greater research on integrating the value of environmental damage caused by dominant sources of illicit flows into ongoing initiatives on the measurement of IFFs. Such efforts could allow African Governments to strengthen the case for bridging negotiation agendas on curbing IFFs and making claims on climate finance (chapter 5).

⁹⁷ For more information on the Sustainable Stock Exchanges Initiative, see <https://sseinitiative.org/>.

⁹⁸ See <https://unctad.org/en/Pages/DIAE/ISAR/UNDA-Project-1819H.aspx>.

⁹⁹ See <https://www.pwyp.org/>.

7.10 Rekindle trust in multilateralism through tangible actions in the fight against illicit financial flows

Support multilateralism to curb illegal financial flows at the Economic and Social Council and United Nations General Assembly

Multilateralism implies use of international cooperation to attempt to find solutions to transnational problems. Globalization has brought a new set of challenges to multilateralism, as globalization is associated with the spread of problems of a transnational dimension and involving many non-State actors (Newman et al., eds., 2006). IFFs are part of such transnational problems and, hence, could be resolved through multilateral means. Such efforts could benefit from lessons learned from multilateral engagement on the international commodity agenda (chapter 4).

Beyond the multiple United Nations resolutions on IFFs, recent initiatives, such as a joint initiative to establish a high-level panel on financial accountability, transparency and integrity under the President of the General Assembly and the President of the Economic and Social Council, provide hope of moving towards more concrete action on addressing IFFs through inclusive multilateral action. The joint initiative is set in the context of the Decade of Action to help promote faster progress towards achieving the 2030 Agenda on Sustainable Development. The panel is expected to produce an interim report in July 2020 and a final report with recommendations in January 2021.

Walk the talk: Put more resources in international cooperation on illicit financial flows

More resources are needed to amplify the work of various agencies and donors to enhance the capacity of local revenue authorities in Africa. OECD and UNDP, for example, set up the Tax Inspectors Without Borders programme which delivers technical assistance predominantly on auditing multinational taxpayers. The programme claims to have contributed to an additional \$220 million in tax revenue in Africa between 2013 and 2018 (OECD and UNDP, 2018). Several donors committed to double their aid for tax capacity-building between 2015 and 2020 through the Addis Tax Initiative. This initiative aims at increasing the volume and quality of technical assistance to enhance domestic resource mobilization in partner countries. Furthermore, OECD along with three countries (Germany, Italy and Kenya) launched the pilot programme, Africa Academy for Tax and Financial Crime Investigation, at the Group of 20 Africa Conference held in Berlin in June 2017. This programme will cover all aspects of conducting and managing financial investigations, including complex money-laundering and the role of tax investigators,

investigative techniques, identifying, freezing and recovering assets, managing international investigations and speciality topics, such as value added tax/goods and services tax fraud.

Enhance cooperation on tackling illicit financial flows in relation to achieving health-related Sustainable Development Goals and building resilience to shocks

The current coronavirus disease outbreak is first and foremost a health crisis. Second, it is an impediment to progress towards achieving health-related Sustainable Development Goals. Third, it is fast becoming the starting point of a global economic and financial crisis with severe economic and social consequences for the world's poorest countries. Tackling the crisis will not be easy in a context of inadequate funds for health services globally (Glied and Miller, 2015), including in Africa. Though the first to reach a global scale, this coronavirus outbreak is not the first health crisis with international dimensions. The Ebola crisis triggered debates on the creation of an international health emergency fund (Ooms and Hammond, 2014). The Ebola crisis also underlined the critical role that global governance for health could play, through partnership and financial and technical assistance and the reduction of health inequalities (Waris and Latif, 2015). These issues remain relevant today and missed opportunities in fiscal revenue due to tax avoidance and tax evasion should be addressed (ibid.). Although the current epidemic appears to affect fewer women than men, it is likely that women will be affected by the socioeconomic impact of the crisis as core care providers for their families. Achievement of the Sustainable Development Goals in the context of the emerging implications of the current coronavirus disease crisis will likely be more challenging and depend critically on the capacity of African countries to tackle IFFs, which hinder the mobilization of sufficient resources to finance development.

Identify win–win solutions

In addition to engagement through existing mechanisms of information exchange, despite difficulties in avoiding tax competition, developing countries can jointly decide to identify common areas of interest. These could include, for example, an agreement not to give tax incentives on profits, but rather provide incentives on actual business activities based on a set of indicators pertaining to the real economy. Similarly, greater resources could be pooled in undertaking capacity-building initiatives with dual objectives: (a) exchanges of experiences and capacity and (b) coalition building in areas of common interest.

In this regard, African countries could engage in exchanges on negotiation tactics on the combination of multiple agendas with other countries from the global South. The

Republic of Korea, for example, successfully used a request for the restitution of cultural heritage as part of their leverage in 2010 in bilateral trade negotiations with France (Savoy, 2018).¹⁰⁰

However, given differing economic interests, achieving consensus on tackling IFFs among countries will be difficult, but should be fully considered. Indeed, small island developing States, for example, feature prominently among the top list of financial secrecy jurisdictions. In such cases, finding common areas of interest would be more challenging and would necessitate greater investments in preliminary assessments of areas of convergence and compromise.

7.11 Engage on illicit financial flows and ethics

In many ways, addressing IFFs is a matter of ethics. These ethical concerns are recognized by all stakeholders, including MNEs, involved in the fight against IFFs.¹⁰¹ In the African context, the emphasis on ethics is apparent in the African Peer Review Mechanism. The Mechanism's methodology includes a corporate governance thematic area and an objective on ensuring ethical conduct within organizations, which seeks to address corruption and illicit flow of funds (African Union Commission, 2019: 130).

7.12 Conclusion

The role of multilateralism in reducing the harm from IFFs and encouraging greater participation by African countries in global governance on the matter is clear. The expectation is that the recommendations drawn from the analysis presented in this report will strengthen the policy approaches taken to tackle the incidence and impact of IFFs. A stronger and more resilient Africa, as a result, would be better situated to tackle the current coronavirus disease pandemic, as well as future challenges.

¹⁰⁰ See <https://www.theartnewspaper.com/comment/the-restitution-revolution-begins>.

¹⁰¹ The World Bank, for example, states that "a potentially more far-reaching development is the increased attention the private sector is paying to adherence to ethical compliance across all business practices. Increased legal and market risks connected to being associated with corruption have spurred firms to establish ethics and compliance programmes" (available at <https://www.worldbank.org/en/topic/financialsector/brief/illicit-financial-flows-iffs>).

References

- Abotsi KE, Galizzi P and Herklotz A (2015). Wildlife crime and degradation in Africa: An analysis of the current crisis and prospects for a secure future. *Fordham Environmental Law Review*. 27(3):394–441.
- ActionAid (2016). Mistreated: The tax treaties that are depriving the world's poorest countries of vital revenue. Available at https://actionaid.org/sites/default/files/actionaid_-_mistreated_tax_treaties_report_-_feb_2016.pdf.
- Adam S (2019). How high are our taxes, and where does the money come from? Briefing Note 259. The Institute for Fiscal Studies.
- AfDB, OECD, UNDP and UNECA (2012). *African Economic Outlook 2012: Promoting Youth Employment*. OECD Publishing. Paris.
- AfDB (2015). International anti-corruption day: AfDB calls for stronger measures in Africa. Available at <https://www.afdb.org/en/news-and-events/international-anti-corruption-day-afdb-calls-for-stronger-measures-in-africa-15205>.
- Africa Renewal* (2020). Promotion of international cooperation to combat illicit financial flows. Available at <https://www.un.org/africarenewal/news/promotion-international-cooperation-combat-illicit-financial-flows>.
- African Union Commission (2019). *Domestic Resource Mobilization: Fighting Against Corruption and Illicit Financial Flows*. Addis Ababa.
- Ahene-Codjoe AA and Alu A (2019). Commodity trade-related illicit financial flows: Evidence of abnormal pricing in commodity exports from Ghana. Working Paper No. 3. University of Ghana.
- Ajayi SI and Khan MS, eds. (2000). *External Debt and Capital Flight in Sub-Saharan Africa*. IMF. Washington, D.C.
- Ajayi SI and Ndikumana L, eds. (2014). *Capital Flight from Africa: Causes, Effects and Policy Issues*. Oxford University Press. Oxford.
- Alfers L (2016). Our children do not get the attention they deserve: A synthesis of research findings on women informal workers and childcare from six membership-based organizations. *Women in Informal Employment: Globalizing and Organizing*. Cambridge, United States.
- Alliance Sud, Centre for Economic and Social Rights, Global Justice Clinic, New York University School of Law, Public Eye and Tax Justice Network (2016). Swiss responsibility for the extraterritorial impacts of tax abuse on women's rights. Report submitted to the sixty-fifth session of the Committee on the Elimination of Discrimination against Women. Geneva. 24 October–18 November.

- Allingham MG and Sandmo A (1972). Income tax evasion: A theoretical analysis. *Journal of Public Economics*. 1(3):323–338.
- Alstadsæter A, Johannesen N and Zucman G (2018). Who owns the wealth in tax havens? Macro evidence and implications for global inequality. *Journal of Public Economics*. 162(C):89–100.
- Ampah IK and Kiss GD (2019). Economic policy implications of external debt and capital flight in sub-Saharan Africa's heavily indebted poor countries. *Society and Economy*. 41(4):523–542.
- Amundsen I (2017). Nigeria: Defying the resource curse. In: William A and Le Billon P, eds. *Corruption, Natural Resources and Development: From Resource Curse to Political Ecology*. Edward Elgar Publishing. Cheltenham and Northampton, United Kingdom.
- AndersenTax (2019). Review of transfer pricing development in Africa: A study of key sub-Saharan African countries. Available at https://andersentax.ng/docs/review_of_transfer_pricing_development_in_africa_10042019.pdf.
- Anderson B and Jooste J (2014). Wildlife poaching: Africa's surging trafficking threat. Security Brief No. 28. Africa Centre for Strategic Studies.
- Aragón FM and Rud JP (2016). Polluting industries and agricultural productivity: Evidence from mining in Ghana. *The Economic Journal*. 126(597):1980–2011.
- Ariyoshi A, Kirilenko A, Ötker I, Laurens B, Canales Kriljenko J and Habermeier K (2000). Capital controls: Country experiences with their use and liberalization. Occasional Paper No. 190. IMF.
- Asfaw S, Kassie M, Simtowe F and Lipper L (2012). Poverty reduction effects of agricultural technology adoption: A micro evidence from rural [United Republic of] Tanzania. *The Journal of Development Studies*. 48(9):1288–1305.
- ATAF (2019). ATAF high-level tax policy dialogue: Ensuring Africa's place in the taxation of the digital economy. Available at https://events.ataftax.org/media/documents/42/documents/OUTCOMES_STATEMENT_-_3rd_HLPD_Zimbabwe_FINAL.pdf.
- Auty RM (1993). *Sustaining Development in Mineral Economies: The Resource Curse Thesis*. Routledge. London.
- Ayogu MD and Gbadebo-Smith F (2014). Governance and illicit financial flows. In: Ajayi SI and Ndikumana L, eds. *Capital Flight from Africa: Causes, Effects and Policy Issues*. Oxford University Press. Oxford.
- Baker RW (2005). *Capitalism's Achilles' Heel: Dirty Money and How to Renew the Free-Market System*. John Wiley and Sons. Hoboken, United States.

- Banga R (2013). Measuring value in global value chains. Regional Value Chains Background Paper No. 8. UNCTAD.
- Barthel F, Busse M and Neumayer E (2010). The impact of double taxation treaties on foreign direct investment: Evidence from large dyadic panel data. *Contemporary Economic Policy*. 28(3):366–377.
- Bates RH (2006). Institutions and development. *Journal of African Economies*. 15(1):10–61.
- Beer S and Loeprick J (2018). The cost and benefits of tax treaties with investment hubs: Findings from sub-Saharan Africa. Policy Research Working Paper 8623. World Bank.
- Beja jr. EL (2006). Revisiting the revolving door: Capital flight from Southeast Asia. Working Paper No. 16. United Nations Department of Economic and Social Affairs.
- Benk S, McGee RW and Yuzbasi B (2015). How [do] religions affect attitudes toward ethics of tax evasion? A comparative and demographic analysis. *Journal for the Study of Religions and Ideologies*. 14(41):202–223.
- Bensassi S, Jarreau J and Mitaritonna C (2016). Determinants of cross-border informal trade: The case of Benin. Working Paper. International Food Policy Research Institute.
- Bergstrand JH and Egger P (2007). A knowledge-and-physical-capital model of international trade flows, foreign direct investment and multinational enterprises. *Journal of International Economics*. 73(2):278–308.
- Berman N, Couttenier M, Rohner D and Thoenig M (2017). This mine is mine! How minerals fuel conflicts in Africa. *American Economic Review*. 107(6):1564–1610.
- Besley T and Persson T (2010). State capacity, conflict and development. *Econometrica*. 78(1):1–34.
- Bhagwati J (1964). On the underinvoicing of imports. *Bulletin of the Oxford University Institute of Economics and Statistics*. 27(4):389–397.
- Bhagwati J (1967). Fiscal policies, the faking of foreign trade declarations and the balance of payments. *Bulletin of the Oxford University Institute of Economics and Statistics*. 29(1):61–77.
- Bicaba Z, Brixiová Z and Ncube M (2015). Capital account policies, IMF programmes and growth in developing regions. Working Paper Series No. 217. AfDB.

- Biggs EM, Bruce E, Boruff B, Duncan JMA, Horsley J, Pauli N, McNeill K, Neef A, Van Ogtrop F, Curnow J, Haworth B, Duce S and Imanari Y (2015). Sustainable development and the water-energy-food nexus: A perspective on livelihoods. *Environmental Science and Policy*. 54:389–397.
- Birdsall N and Londono JL (1997). Asset inequality matters: An assessment of the World Bank's approach to poverty reduction. *The American Economics Review*. 87(2):32–37.
- Birdsall N, Ross D and Sabot R (1995). Inequality and growth reconsidered: Lessons from East Asia. *The World Bank Economic Review*. 9(3):477–508.
- Blankenburg S and Khan M (2012). Governance and illicit flows. In: Reuter P, ed. *Draining Development? Controlling Flows of Illicit Funds from Developing Countries*. World Bank. Washington, D.C.:21–68.
- Bolwijn R, Casella B and Rigo D (2018). An FDI-driven approach to measuring the scale and economic impact of BEPS. *Transnational Corporations*. 25(2):107–144.
- Boston Consulting Group, the Sutton Trust (2014). Pathways to banking: Improving access for students from non-privileged backgrounds. Available at <https://eric.ed.gov/?q=SERVICES+AND+BANKING&id=ED559276>.
- Bouterige Y, de Quatrebarbes C and Laporte B (2019). Mining taxation in Africa: What recent evolution in 2018? Working Paper P257. Fondation pour les Études et Recherches sur le Développement.
- Braun J, Kasper M, Majdanska A and Somare M (2016). Drivers of suspicious transaction reporting levels: Evidence from a legal and economic perspective. *Journal of Tax Administration*. 2(1):95–125.
- Bridge G (2004). Mapping the bonanza: Geographies of mining investment in an era of neoliberal reform. *The Professional Geographer*. 56(3):406–421.
- Brink J (2018). South Africa's first transfer pricing case? South African Institute of Tax Professionals. Available at <https://www.thesait.org.za/news/409156/South-Africas-first-transfer-pricing-case-.htm>.
- Brugger F and Engenbretsen R (2019). Value chain risk maps. R4D-IFF Working Paper Series. Available at https://curbingiffsdotorg.files.wordpress.com/2019/02/r4d_iff_valuechainriskmaps-1.pdf.
- Bundhoo-Jougla S, Kochen A and Williams T (2005). Bilateral analysis of asymmetries in foreign trade statistics between Germany and the United Kingdom. Edicom Report 200453202016. Her Majesty's Revenue and Customs. Southend-on-Sea, United Kingdom.

- Byerlee DR, Jackson CP and Diao X (2005). Agriculture, rural development and pro-poor growth: Country experiences in the post-reform era. Agriculture and Rural Development Discussion Paper No. 21. World Bank.
- Campos JE and Pradhan S, eds. (2007). *The Many Faces of Corruption: Tracking Vulnerabilities at the Sector Level*. World Bank. Washington, D.C.
- Capraro C (2014). Taxing men and women: Why gender is crucial for a fair tax system. Christian Aid. London.
- Carbonnier G and de Cadena AZ (2015). Commodity trading and illicit financial flows. *Revue internationale de politique de développement*.
- Carbonnier G and Mehrotra R (2018). Trade-related illicit financial flows: Conceptual framework and empirical methods. Working Paper No. R4D-IFF-WP01-2018. The Graduate Institute of International and Development Studies
- Carbonnier G and Mehrotra R (2019). Abnormal pricing in international commodity trade: Empirical evidence from Switzerland. Discussion Paper No. R4D-IFF-WP01-2019. The Graduate Institute of International and Development Studies.
- Cardoso EA and Dornbusch R (1989). Foreign private capital flows. In: Chenery H and Srinivasan TN, eds. *Handbook of Development Economics*. Elsevier:1387–1439.
- Carr DL, Markusen JR and Maskus KE (2001). Estimating the knowledge-capital model of the multinational enterprise. *American Economic Review*. 91(3):693–708.
- Carter P (2017). Why do development finance institutions use offshore financial centres? Overseas Development Institute.
- Cathey J, Hong KP and Pak SJ (2018). Estimates of undervalued import of EU[European Union] countries and the US[United States] from the Democratic Republic of [the] Congo during 2000–2010. *International Trade Journal*. 32(1):116–128.
- Chaikin D and Sharman JC (2009). Corruption and money-laundering. *Journal of Law and Society*. 36(4):589–591.
- Chaisse J (2016). The E15 initiative: Strengthening the global trade and investment system for sustainable development. International Centre for Trade and Sustainable Development and World Economic Forum. Available at <http://e15initiative.org/publications/international-investment-law-taxation-coexistence-cooperation/>.
- Chalendar C, Raballand G and Rakotoarisoa A (2016). The use of detailed statistical data in customs reform: The case of Madagascar. Policy Research Working Paper No. 7625. World Bank.
- Chérel-Robson M (2017). Is local content a catalyst for development? The case of oil in Nigeria. Background document to the *Commodities and Development Report 2017*.

- Chibundu MO (2010). Tensions between international law and domestic responsibilities. *International Law Studies Journal of International Law*. 1:1–9.
- Cobham A and Janský P (2018). Global distribution of revenue loss from corporate tax avoidance: Re-estimation and country results. *Journal of International Development*. 30(2):206–232.
- Cobham A and Janský P (2019). Measuring misalignment: The location of US[United States] multinationals' economic activity versus the location of their profits. *Development Policy Review*. 37(1):91–110.
- Collier P (2007). *The Bottom Billion: Why the Poorest Countries are Falling and What Can Be Done About It*. Oxford University Press. Oxford
- Collier P and Goderis B (2008). Commodity prices, growth and the natural resource curse: Reconciling a conundrum. Munich Personal Research Papers in Economics Archive. University Library of Munich, Germany.
- Collier P and Hoeffler A (2004). Greed and grievance in civil war. *Oxford Economic Papers*. 56(4):563–595.
- Collier P, Hoeffler A and Pattillo C (2001). Flight capital as a portfolio choice. *World Bank Economic Review*. 15(1):55–80.
- Coulibaly BS and Gandhi D (2018). Mobilization of tax revenues in Africa: State of play and policy options. Policy Brief. Brookings.
- Crédit Suisse (2017). Global Wealth Report 2017: Where are we 10 years after the crisis? Available at <https://www.credit-suisse.com/about-us-news/en/articles/news-and-expertise/global-wealth-report-2017-201711.html>.
- Crédit Suisse (2019). The Crédit Suisse gender 3000 report 2019: The changing face of companies. Available at <https://www.credit-suisse.com/about-us-news/en/articles/news-and-expertise/cs-gender-3000-report-2019-201910.html>.
- Crivelli E, de Mooij RA and Keen MJ (2015). Base erosion, profit shifting and developing countries. Working Paper No. 15/118. IMF.
- Cumby R and Levich R (1987). On the definition and magnitude of recent capital flight. Working Paper No. w2275. National Bureau of Economic Research.
- Dachraoui H and Smida M (2014). Measurement of capital flight and its impact on domestic investment in emerging countries. Munich Personal Research Papers in Economics Archive. University Library of Munich, Germany.
- Daurer V (2014). *Tax Treaties and Developing Countries*. Series on International Taxation No. 44. Kluwer Law International.

- De Wulf L (1981). Statistical analysis of under- and overinvoicing of imports. *Journal of Development Economics*. 8(3):303–323.
- Devereux MP and Griffith R (1998). Taxes and the location of production: Evidence from a panel of US[United States] multinationals. *Journal of Public Economics*. 68(3):335–367.
- Devereux MP and Griffith R (2003). Evaluating tax policy for location decisions. *International Tax and Public Financing*. 10(2):107–126.
- DLA Piper (2012). Mining in Africa: A legal overview. Available at <https://www.dlapiper.com/en/global/insights/publications/2018/08/mining-in-africa/>.
- Douglas LR and Alie K (2014). High-value natural resources: Linking wildlife conservation to international conflict, insecurity and development concerns. *Biological Conservation*. 171:270–277.
- Eckstein D, Hutfild M-L and Wings M (2019). Global climate risk index: Who suffers most from extreme weather events? Weather-related loss events in 2017 and 1998 to 2017. Briefing paper. German Watch.
- EITI Togo (2013). Report on the reconciliation of extractive payment and revenues for the year 2013. Available at <https://itietogo.org/rapport-itie/>.
- Elborgh-Woytek K, Newiak M, Kochhar K, Fabrizio S, Kpodar KR, Wingender P, Clements BJ and Schwartz G (2013). Women, work and the economy: Macroeconomic gains from gender equity. Staff Discussion Notes No. 13/10. IMF.
- El-Kady H (2016). Towards a more effective international investment policy framework in Africa. *Transnational Dispute Management*. 4.
- El-Kady H and De Gama M (2019). The reform of the international investment regime: An African perspective. *International Centre for Settlement of Investment Disputes Review – Foreign Investment Law Journal*. 34(2):482–495.
- European Commission (2017). The EU[European Union] new conflict minerals regulation: A quick guide if you're involved in the trade in tin, tungsten, tantalum or gold. Available at https://trade.ec.europa.eu/doclib/docs/2017/march/tradoc_155423.pdf.
- European Parliament (2017). Report A8-0357/2017. Available at https://www.europarl.europa.eu/doceo/document/A-8-2017-0357_EN.html.
- Ezenagu A (2019). Safe harbour regimes in transfer pricing: An African perspective. ICTD Working Paper No. 100. Available at <https://www.ictd.ac/publication/safe-harbour-regimes-in-transfer-pricing-an-african-perspective/>.

- Feld L and Frey B (2006). Tax evasion in Switzerland: The roles of deterrence and tax morale. Working Paper. Centre for Research in Economics, Management and the Arts.
- Financial Action Task Force (2003). *Financial Action Task Force: 40 Recommendations*. Available at <https://www.fatf-gafi.org/media/fatf/documents/FATF%20Standards%20-%2040%20Recommendations%20rc.pdf>.
- Financial Action Task Force (2015). *Annual Report 2015–2016*. Available at www.fatf-gafi.org/media/fatf/documents/reports/FATF-annual-report-2015-2016.pdf.
- Financial Action Task Force–Asia Pacific Group on Money-Laundering (2018). *Financial Flows from Human Trafficking*. Paris.
- Fitter R and Kaplinsky R (2001). Who gains from product rents as the coffee market becomes more differentiated? A value chain analysis. *Institute of Development Studies Bulletin*. 32(3):69–82.
- Fofack H and Ndikumana L (2010). Capital flight repatriation: Investigation of its potential gains for sub-Saharan African countries. *African Development Review*. 22(1):4–22.
- Forstater M (2017). Gaps in trade data ≠ criminal money-laundering. Available at <https://www.cgdev.org/blog/gaps-trade-data-criminal-money-laundering>.
- Forstater M (2018). Illicit financial flows, trade misinvoicing and multinational tax avoidance: The same or different? Policy Paper No. 123. Centre for Global Development
- France, Assemblée Nationale (2019). Mission d'information commune relative au bilan de la lutte contre les montages transfrontaliers. Available at http://www.assemblee-nationale.fr/dyn/15/dossiers/bilan_lutte_montages_transfrontaliers_mi.
- Francophone LIC[Low-Income Country] Finance Ministers Network (2014). LIC[Low-Income Country] Ministers demand their fair share of global tax revenues. Available at <http://www.oecd.org/dac/OIF%20Recommendations.pdf>.
- Frankel JA (2010). The natural resource curse: A survey. Working Paper No. 15836. National Bureau of Economic Research.
- Fukuda-Parr S (2003). The human development paradigm: Operationalizing Sen's ideas on capabilities. *Feminist Economics*. 9:301–317.
- Fukuda-Parr S and Kumar S, eds. (2006). *Readings in Human Development: Concepts, Measures and Policies for a Development Paradigm*. Oxford University Press. Oxford.

- Gaspar V, Amaglobeli D, Escribano MG, Prady D and Soto M (2019). Fiscal policy and development: Human, social and physical investments for the SDGs[Sustainable Development Goals]. Staff Discussion Notes No. 19/03. IMF.
- Gayi S (2020). Illicit financial flows and commodities in Africa. Background paper. UNCTAD.
- Gayi S and Chérel-Robson M (forthcoming). International commodity governance and illicit financial flows. UNCTAD. Geneva.
- Gholami H and Salihu HA (2019). Combating corruption in Nigeria: The emergence of whistle-blowing policy. *Journal of Financial Crime*. 26:131–145.
- Gibbon P (2001). Upgrading primary production: A global commodity chain approach. *World Development*. 29(2):345–363.
- Gibbon P and Ponte S (2005). *Trading Down: Africa, Value Chains and the Global Economy*. Temple University Press. Philadelphia, United States.
- Gilbert C (2011). International agreements for commodity price stabilization: An assessment. Food, Agriculture and Fisheries Working Papers No. 53. OECD.
- Glied SA and Miller EA (2015). Economics and health reform: Academic research and public policy. *Medical Care Research and Review*. 72(4):379–394.
- Global Financial Integrity (2017). Illicit financial flows to and from developing countries: 2005–2014. Available at www.gfintegrity.org/wp-content/uploads/2017/05/GFI-IFF-Report-2017_final.pdf.
- Global Financial Integrity (2019). Illicit financial flows to and from 148 developing countries: 2006–2015. Available at <https://gfintegrity.org/report/2019-iff-update/>.
- Godonou A (2007). A propos de l’universalité et du retour des biens culturels. Available at <http://africultures.com/a-propos-de-luniversalite-et-du-retour-des-biens-culturels-6752/>.
- Gray L, Hansen K, Recica-Kirkbride P and Mills L (2014). *Few and Far: The Hard Facts on Stolen Asset Recovery*. World Bank and OECD. Washington, D.C.
- Grigoli F (2015). A hybrid approach to estimating the efficiency of public spending on education in emerging and developing economies. *Applied Economics and Finance*. 2(1):19–32.
- Grigoli F and Kapsoli J (2013). Waste not, want not: The efficiency of health expenditure in emerging and developing economies. Working Paper No. 13/187. IMF.
- GSMA (2019). The mobile economy: Sub-Saharan Africa. Available at <https://www.gsma.com/mobileeconomy/sub-saharan-africa/>.

- Guj P, Marin S, Maybee B, Cawood F, Bocoum B, Gosai N and Huibregtse S (2017). *Transfer Pricing in Mining with a Focus on Africa: A Reference Guide for Practitioners*. World Bank and Minerals and Energy for Development Alliance. Washington, D.C.
- Haberly D and Wójcik D (2015). Regional blocks and imperial legacies: Mapping the global offshore FDI network. *Economic Geography*. 91(3):251–280.
- Hall RE and Jones CI (1999). Why do some countries produce so much more output per worker than others? *The Quarterly Journal of Economics*. 114(1):83–116.
- Hayashi F and Prescott EC (2006). The depressing effect of agricultural institutions on the pre-war Japanese economy. *Journal of Political Economy*. 116(4):573–632.
- Hearson M (2016). Measuring tax treaty negotiation outcomes: The ActionAid tax treaties data set. Working Paper No. 47. ICTD.
- Hearson M (2018). When do developing countries negotiate away their corporate tax base? *Journal of International Development*. 30(2):233–255.
- Hearson M (forthcoming). International tax avoidance in Africa. Background paper for *Economic Development in Africa Report 2020*. UNCTAD.
- Hearson M and Kangave J (2016). A review of Uganda’s tax treaties and recommendations for action. Working Paper No. 50. Institute of Developmental Studies.
- Henry J (2012). The price of offshore revisited. Available at <https://www.taxjustice.net/2014/01/17/price-offshore-revisited/>.
- Herkenrath M (2014). Illicit financial flows and their developmental impacts: An overview. *Revue internationale de politique de développement*.
- Hong KP and Pak SJ (2017). Estimating trade misinvoicing from bilateral trade statistics: The devil is in the details. *International Trade Journal*. 31(1):3–28.
- Horst T (1971). The theory of the multinational firm: Optimal behaviour under different tariff and tax rates. *Journal of Political Economy*. 79(5):1059–1072.
- Hunter M and Smith A (2017). *Follow the Money: Financial Flows linked to Artisanal and Small-Scale Gold Mining in Sierra Leone – A Case Study*. Global Institute against Transnational Organized Crime.
- Independent Commission for the Reform of International Corporate Taxation (2018). A road map to improve rules for taxing multinationals. Available at www.dbriefsap.com/bytes/Feb2018_3.IndependentCommissionforReformofInternationalCorporateTaxreport.pdf.
- Ifejika SI (2018). The “other side” of whistle-blowing practice: Experiences from Nigeria. *Rule of Law and Anti-Corruption Centre Journal*. 4.

- Ihugba OA, Ukwunna JC and Obiukwu S (2019). Government education expenditure and primary school enrolment in Nigeria: An impact analysis. *Journal of Economics and International Finance*. 11(3):24–37.
- IMF (2004). *Financial Intelligence Units: An Overview*. Washington, D.C.
- IMF (2008). *Regional Economic Outlook: Sub-Saharan Africa*. Washington, D.C.
- IMF (2014). Implementing AML/CFT[Anti Money-Laundering/Combating the Financing of Terrorism] measures in the precious minerals sector: Preventing crime while increasing revenue. Technical Notes and Manuals 14/01.
- IMF (2020). IMF and the fight against illicit financial flows. Available at <https://www.imf.org/en/About/Factsheets/Sheets/2018/10/07/imf-and-the-fight-against-illicit-financial-flows>.
- Intergovernmental Action Group against Money-Laundering in West Africa (2014). *2014 Annual Report*. Dakar.
- Intergovernmental Action Group against Money-Laundering in West Africa (2018). Summary of countries' activity reports: October 2017–September 2018. Prepared for the thirtieth plenary meeting of the Technical Commission. 12–16 November 2018.
- Intergovernmental Forum on Mining, Minerals, Metals and Sustainable Development (2017). Guidance for Governments managing artisanal and small-scale mining. International Institute for Sustainable Development. Winnipeg, Canada.
- International Criminal Police Organization, Rhipito Norwegian Centre for Global Analysis and Global Initiative against Transnational Organized Crime (2018). *World Atlas of Illicit Flows*.
- International Finance Corporation (2014). *Sustainable and Responsible Mining in Africa: A Getting Started Guide*. Nairobi.
- International Labour Organization (2019). *A Quantum Leap for Gender Equality: For a Better Future of Work for All*. Geneva.
- Ireland, Ministry of Finance (2015). IBFD[International Bureau of Fiscal Documentation] spillover analysis: Possible effects of the Irish tax system on developing economies. Available at www.budget.gov.ie/Budgets/2016/Documents/IBFD_Irish_Spillover_Analysis_Report_pub.pdf.
- James D (2019). Anti-development impacts of tax-related provisions in proposed rules on digital trade in WTO. *Development*. 62(1):58–65.

- Janský P and Palanský M (2018). Estimating the scale of profit shifting and tax revenue losses related to foreign direct investment. Working Paper No. 21. UNU-WIDER. Helsinki.
- Jerven M (2013). *Poor Numbers: How We Are Misled by African Development Statistics and What To Do About It*. Cornell University Press.
- Johannesen N, Tørsløv T and Wier L (2016). Are less developed countries more exposed to multinational tax avoidance? Method and evidence from micro data. Working Paper No. 10. UNU-WIDER. Helsinki.
- Kar D and Cartwright-Smith D (2009). Illicit financial flows from developing countries: 2002–2006. Available at DOI:10.2139/ssrn.1341946.
- Karl TL (1997). *The Paradox of Plenty: Oil Booms and Petro-States*. University of California Press. Berkeley, United States.
- Kaufman D, Kraay A and Mastruzzi M (2005). Governance matters IV: Governance indicators for 1996–2004. Policy Research Working Paper No. 3630. World Bank.
- Kharas H and McArthur J (2019). Building the SDG[Sustainable Development Goal] economy: Needs, spending and financing for universal achievement of the Sustainable Development Goals. Working Paper No. 131. Brookings.
- Knowles, S (2001). Inequality and economic growth: The empirical relationship reconsidered in the light of comparable data. Credit Research Paper No. 01/03. Centre for Research in Economic Development and International Trade. University of Nottingham, United Kingdom.
- Kose MA, Prasad ES, Rogoff K and Wei S-J (2009). Financial globalization: A reappraisal. *Panoeconomicus*. 56(2):143–197.
- Kotsadam A and Tolonen A (2016). African mining, gender and local employment. *World Development*. 83(C):325–339.
- Kuteesa F, Tumusiime-Mutebile E, Whitworth A and Williamson T, eds. (2010). *Uganda's Economic Reforms: Insider Accounts*. Oxford University Press. Oxford.
- Lannen A, Bürgi Bonanomi E, Rist S and Wehrli J (2016). Switzerland and the commodities trade: Taking stock and looking ahead. Factsheet 11(1). Swiss Academies of Arts and Sciences.
- Laporte B, de Quatrebarbes C and Bouterige Y (2017). Mining taxation in Africa: The gold mining industry in 14 countries from 1980 to 2015. Working Paper No. 164. Fondation pour les Études et Recherches sur le Développement.
- Le Billon P (2011). Extractive sectors and illicit financial flows: What role for revenue governance initiatives? *U4 Issue*. 2011:13.

- Lemieux AM and Clarke RV (2009). The international ban on ivory sales and its effects on elephant poaching in Africa. *British Journal of Criminology*. 49(4):451–471.
- Letete E and Sarr M (2017). Illicit financial flows and political institutions in Kenya. Working Paper No. 275. AfDB.
- Lewis M, Brooks R, Chisanga P, Hearson M, Jordan C, Nshindano K, Tharoor A and Wu P (2013). Sweet nothings: The human cost of a British sugar giant avoiding taxes in Southern Africa. Available at https://www.actionaid.org.uk/sites/default/files/doc_lib/sweet_nothings.pdf.
- LEX Africa (2019). *Guide to Mining Regimes in Africa 2019*. Luanda.
- Limão N and Venables AJ (2001). Infrastructure, geographical disadvantage, transport costs and trade. *The World Bank Economic Review*. 15(3):451–479.
- Lippert A (2014). Spillovers of a resource boom: Evidence from Zambian copper mines. Ox Carre Working Paper No. 131. Oxford Centre for the Analysis of Resource Rich Economies.
- Luttmer EFP and Singhal M (2014). Tax morale. *Journal of Economic Perspectives*. 28(4):149–168.
- Makuta I and O'Hare B (2015). Quality of governance, public spending on health and health status in sub-Saharan Africa: A panel data regression analysis. *Bio Med Central Public Health*. 15.
- Malhotra G (2010). A new dimension of socioeconomic offences: E[lectronic] money-laundering. Available at DOI:10.2139/ssrn.1635651.
- Manuel M, Desai H, Samman E and Evans M (2018). Financing the end of extreme poverty. Overseas Development Institute.
- Marini M, Dippelsman R and Stanger M (2018). New estimates for direction of trade statistics. Working Paper No. 16. IMF.
- Martins PMG (2019). Structural change rediscovered: The role of human and physical capital. Research and Policy Brief No. 24. World Bank.
- Marur S (2019). Mirror-trade statistics: Lessons and limitations in reflecting trade misinvoicing. Discussion Paper No. R4D-IFF-WP08-2019. Graduate Institute of International and Development Studies.
- Maweje J and Sebudde RK (2019). Tax revenue potential and effort: Worldwide estimates using a new data set. *Economic Analysis and Policy*. 63(C):119–129.
- May C (2017). *Transnational Crime and the Developing World*. Global Financial Integrity.

- Mbembe A (2015). Decolonizing knowledge and the question of the archive. Available at <https://trafo.hypotheses.org/2413>.
- McDaniel CA and Norberg HC (2019). Can blockchain technology facilitate international trade? Mercatus Research Paper. Available at <https://ssrn.com/abstract=3377708>.
- McKinsey Global Institute (2015). How advancing women's equality can add \$12 trillion to global growth.
- McKinsey Global Institute (2019). The power of parity: Advancing women's equality in the United States.
- McMillan M, Rodrik D and Sepúlveda C, eds. (2017). *Structural Change, Fundamentals and Growth: A Framework and Case Studies*. International Food Policy Research Institute. Washington, D.C.
- McMillan M, Rodrik D and Verduzco-Gallo Í (2014). Globalization, structural change and productivity growth, with an update on Africa. *World Development*. 63:11–32.
- McMillan M and Harttgen K (2014). What is driving the “African growth miracle”? Working Paper No. 20077. National Bureau of Economic Research.
- Mehlum H, Moene K and Torvik R (2006). Institutions and the resource curse. *The Economic Journal*. 116(508):1–20.
- Messina J (2006). The role of product market regulations in the process of structural change. *European Economic Review*. 50(7):1863–1890.
- Mevel S, Ofa SV and Karingi S (2013). Quantifying illicit financial flows from Africa through trade mispricing and assessing their incidence on African economies. Presented at the sixteenth Global Trade Analysis Project conference. 12–14 June.
- Miao G and Fortanier F (2017). Estimating transport and insurance costs of international trade. Statistics Working Paper No. 04. OECD.
- Miyandazi L (2019). The complexities of tackling illicit financial flows in practice. Available at <https://ecdpm.org/publications/complexities-of-tackling-illicit-financial-flows-in-practice/>.
- Miyandazi L and Ronceray M (2018). Understanding illicit financial flows and efforts to combat them in Europe and Africa. Discussion Paper Series. European Centre for Development Policy Management.
- Moore M (2012). The practical political economy of illicit flows. In: Reuter P, ed. *Draining Development? Controlling Flows of Illicit Funds from Developing Countries*. World Bank. Washington, D.C.:457–482.
- Moore M, Prichard W and Fjeldstad O-H (2018). *Taxing Africa: Coercion, Reform and Development*. Zed Books. London.

- Morgenstern O (1963). *On the Accuracy of Economic Observations*. Princeton University Press.
- Morrissey O, Lopez RA and Sharma K (2015). *Handbook on Trade and Development*. Edward Elgar Publishing.
- Moulemyo A (2016). Impact of capital flight on public social expenditure in Congo-Brazzaville. *African Development Review*. 28(S1):113–123.
- Mühlen H and Escobar O (2020). The role of FDI in structural change: Evidence from Mexico. *The World Economy*. 43(3):557–585.
- Murphy R (2019). The European tax gap: A report for the Socialists and Democrats Group in the European Parliament. Available at https://www.socialistsanddemocrats.eu/sites/default/files/2019-01/the_european_tax_gap_en_190123.pdf.
- Musindarwezo D (2018). The 2030 Agenda from a feminist perspective: No meaningful gains without greater accountability for Africa's women. *Agenda*. 32(1):25–35.
- Musselli I and Bürgi Bonanomi E (2020). Illicit financial flows: Concepts and definition. *Revue internationale de politique de développement*.
- Ndiaye AS (2009). Capital flight and its determinants in the Franc zone. *African Journal of Economic Policy*. 16(1).
- Ndiaye AS (2014). Capital flight from the Franc zone: Exploring the impact on economic growth. Research Paper No. 269. African Economic Research Consortium.
- Ndiaye AS and Siri A (2016). Capital flight from Burkina Faso: Drivers and impact on tax revenue. *African Development Review*. 28(S1):100–112.
- Ndikumana L (2003). Capital flows, capital account regimes and foreign exchange rate regimes in Africa. Working Paper Series No. 55. Political Economy Research Institute.
- Ndikumana L (2014). Capital flight and tax havens: Impact on investment and growth in Africa. *Revue d'économie du développement*. 22(2):113–141.
- Ndikumana L and Boyce JK (2010). Measurement of capital flight: Methodology and results for sub-Saharan African countries. *African Development Review*. 22(4):471–481.
- Ndikumana L and Boyce JK (2011). *Africa's Odious Debts: How Foreign Loans and Capital Flight Bled a Continent*. Zed Books. London.
- Ndikumana L and Boyce JK (2018). Capital flight from Africa: Updated methodology and new estimates. Research Report. Political Economy Research Institute.

- Ndikumana L and Boyce JK (2019). Magnitudes and mechanisms of capital flight from Angola, Côte d'Ivoire and South Africa. Capital Flight from Africa Working Paper No. 500. Political Economy Research Institute.
- Ndikumana L, Boyce JK and Ndiaye AS (2014). Capital flight: Measurement and drivers. Research Report No. 363. Political Economy Research Institute.
- Nelson J, Krokeme O, Markjarkson D and Timipere ET (2018). Impact of capital flight on exchange rate in Nigeria. *International Journal of Academic Research in Accounting, Finance and Management Sciences*. 8(1):41–50.
- Netherlands, Ministry of Finance (2013). Government's response to the report from Seo Economics Amsterdam on other financial institutions and the IBFD[International Bureau of Fiscal Documentation] report on developing countries. Available at <https://www.government.nl/documents/parliamentary-documents/2013/09/09/government-s-response-to-the-report-from-seo-economics-amsterdam-on-other-financial-institutions-and-the-ibfd-report-on-develop>.
- Neumayer E (2006). Do double taxation treaties increase foreign direct investment to developing countries? *The Journal of Development Studies*, 43(8):1501–1519.
- Newman E, Thakur R and Tirman J, eds. (2006). *Multilateralism Under Challenge: Power, International Order and Structural Change*. United Nations University Press. Tokyo.
- Nicolaou-Manias K and Wu Y (2016). Illicit financial flows estimating trade mispricing and trade-based money-laundering for five African countries. Available at www.gegafira.org/publications/illicit-financial-flows-estimating-trade-mispricing-and-trade-based-money-laundering-for-five-african-countries.
- Nin-Pratt A (2015). Inputs, productivity and agricultural growth in Africa south of the Sahara. Discussion Paper No. 01432. International Food Policy Research Institute.
- Nitsch V (2011). Trade mispricing and illicit flows. Discussion Papers in Economics No. 206. Darmstadt University.
- Nkurunziza JD (2014). Capital flight and poverty reduction in Africa. In: Ajayi SI and Ndikumana L, eds. *Capital Flight from Africa*. Oxford University Press. Oxford:81–110.
- Nordhaus WD (1974). Resources as a constraint on growth. *The American Economic Review*. 64(2):22–26.
- Nordhaus WD (2014). Estimates of the social cost of carbon: Concepts and Results from the DICE[Dynamic Integrated Climate-Economy]-2013R model and alternative approaches. *Journal of the Association of Environmental and Resource Economists*. 1(1).

- North DC (1994). Institutions matter. Economic History No. 9411004. University Library of Munich, Germany.
- OECD (2007). *Manual on Effective Mutual Agreement Procedures*. Available at www.oecd.org/ctp/38061910.pdf.
- OECD (2013). *Addressing Base Erosion and Profit Shifting*. OECD Publishing. Paris.
- OECD (2015). OECD/Group of 20 Base Erosion and Profit Shifting Project explanatory statement: 2015 final reports. Available at www.oecd.org/ctp/beps-explanatory-statement-2015.pdf.
- OECD (2016). OECD Secretary-General Angel Gurría welcomes European Commission corporate tax avoidance proposals. Available at <https://www.oecd.org/tax/oecd-secretary-general-angel-gurria-welcomes-european-commission-corporate-tax-avoidance-proposals.htm>.
- OECD (2017). OECD Council approves the 2017 update to the OECD model tax convention. Available at <https://www.oecd.org/tax/treaties/oecd-approves-2017-update-model-tax-convention.htm>.
- OECD (2018a). *A Broken Social Elevator? How to Promote Social Mobility*. OECD Publishing. Paris.
- OECD (2018b). Additional guidance on the attribution of profits to a permanent establishment. BEPS Action 7.
- OECD (2018c). *Tax Challenges Arising from Digitalization – Interim Report 2018*. OECD Publishing. Paris.
- OECD (2019a). *Risks That Matter: Main Findings from the 2018 OECD Risks that Matter Survey*. OECD Publishing. Paris.
- OECD (2019b). The Multilateral Convention on Mutual Administrative Assistance in Tax Matters. Update, questions and answers. Available at https://www.oecd.org/tax/exchange-of-tax-information/ENG_Convention_Flyer.pdf.
- OECD (2019c). *The Illegal Wildlife Trade in Southeast Asia: Institutional Capacities in Indonesia, Singapore, Thailand and Viet Nam*. OECD Publishing. Paris.
- OECD (2019d). Public consultation document: Secretariat proposal for a “unified approach” under pillar one. Available at <https://www.oecd.org/tax/beps/public-consultation-document-secretariat-proposal-unified-approach-pillar-one.pdf>.
- OECD (2019e). OECD and Group of 20 inclusive framework on BEPS: Progress report July 2017–June 2018. Available at www.oecd.org/ctp/inclusive-framework-on-beps-progress-report-june-2017-july-2018.htm.

- OECD and UNDP (2018). *Tax Inspectors Without Borders: Annual Report 2017/18*. Available at www.tiwb.org/resources/publications/tax-inspectors-without-borders-annual-report-2017-2018-web.pdf.
- Office of the High Commissioner for Human Rights (2015). Joint statement by United Nations human rights experts, the rapporteur on the rights of women of the Inter-American Commission on Human Rights and the special rapporteurs on the rights of women and human rights defenders of the African Commission on Human and Peoples' Rights. Available at <https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=16490&LangID=E>.
- Ogbonnaya AK and Ogechuckwu OS (2017). Impact of illicit financial flow on economic growth and development: Evidence from Nigeria. *International Journal of Innovation and Economic Development*. 3(4):19–33.
- Olatunji O and Oloye MI (2015). Impact of capital flight on economic growth in Nigeria. *International Journal for Innovation Education and Research*. 3(8):10–46.
- Omojola O (2019). Whistle blower protection as an anti-corruption tool in Nigeria. *Journal of Law, Policy and Globalization*. 92:173–179.
- Onuegbulam MC (2017). Whistle-blowing policy and the fight against corruption in Nigeria: Implications for criminal justice and the due process. *Nnamdi Azikiwe University Journal of International Law and Jurisprudence*. 8(2).
- Onyele KO and Nwokocha EB (2016). The relationship between capital flight and poverty: The case of Nigeria. *Scientific Papers Series: Management, Economic Engineering in Agriculture and Rural Development*. 16(3).
- Ooms G and Hammond R (2014). Financing global health through a global fund for health? Working Group on Financing, Paper 4. Chatham House.
- Osiander A (2001). Sovereignty, international relations and the Westphalian myth. *International Organization*. 55(2):251–287.
- Ouoba Y (2018). Industrial mining land use and poverty in regions of Burkina Faso. *Agricultural Economics*. 49(4):511–520.
- Oxfam (2018). Reward work not wealth. Available at https://www-cdn.oxfam.org/s3fs-public/file_attachments/bp-reward-work-not-wealth-220118-summ-en.pdf.
- Oxfam (2019). Off the hook: How the EU[European Union] is about to whitewash the world's worst tax havens. Available at <https://policy-practice.oxfam.org.uk/publications/off-the-hook-how-the-eu-is-about-to-whitewash-the-worlds-worst-tax-havens-620625>.

- Östensson O (2018). Misinvoicing in mineral trade: What do we really know? *Mineral Economics*. 31(1–2):77–86.
- Palan R (2002). Tax havens and the commercialization of state sovereignty. *International Organization*. 56(1):151–176.
- Parker D and Vadheim B (2017). Resource cursed or policy cursed? US[United States] regulation of conflict minerals and violence in the [Democratic Republic of the] Congo. *Journal of the Association of Environmental and Resource Economists*. 4(1):1–49.
- Picciotto S (2013). Is the international tax system fit for purpose, especially for developing countries? Working Paper No. 13. ICTD.
- Picciotto S (2018). Problems of transfer pricing and possibilities for simplification. Available at <https://www.ictd.ac/publication/problems-of-transfer-pricing-and-possibilities-for-simplification/>.
- Piketty T (2019). *Capital et idéologie*. Seuil. Paris.
- Prebisch R (1950). *The Economic Development of Latin America and its Principal Problems*. United Nations Economic Commission for Latin America (United Nations publication. Sales No. 50.II.G.2. New York).
- Preobragenskaya G and McGee RW (2016). A demographic study of Russian [Federation] attitudes toward tax evasion. *Journal of Accounting, Ethics and Public Policy*. 17(1).
- Prichard W and Bentum I (2009). *Taxation and Development in Ghana: Finance, Equity and Accountability*. Tax Justice Network. London.
- Quentin D (2017). Risk-mining the public exchequer. *Journal of Tax Administration*. 3(2).
- Ravallion M (2001). Growth, inequality and poverty: Looking beyond averages. Policy Research Working Paper No. 2558. World Bank.
- Redhead A (2017). Improving mining revenue collection: [United Republic of] Tanzania's Mineral Audit Agency. Natural Resource Charter Case Study. Natural Resource Governance Institute.
- Reed Q and Fontana A (2011). Corruption and illicit financial flows: The limits and possibilities of current approaches. U4 Issue No. 2. Anti-Corruption Resource Centre, Christian Michelsen Institute.
- Reuter P (2012). *Draining Development? Controlling Flows of Illicit Funds from Developing Countries*. World Bank. Washington, D.C.

- Reuters (2019). Gold worth billions smuggled out of Africa. Available at <https://www.reuters.com/investigates/special-report/gold-africa-smuggling/>.
- Sachs JD and Warner AM (1995). Natural resource abundance and economic growth. Working Paper No. 5398. National Bureau of Economic Research.
- Sachs JD and Warner AM (2001). The curse of natural resources. *European Economic Review*. 45:827–838.
- Sahay MR, Cihak M, N'Diaye PM, Barajas A, Kyobe AJ, Mitra S, Mooi YN and Yousefi R (2017). Banking on women leaders: A case for more? Working Paper No. 199. IMF.
- Säid Business School (2019). *Responsible Business Forum – The Economics of Mutuality*. University of Oxford.
- Sala-i-Martin X and Subramanian A (2003). Addressing the natural resource curse: An illustration from Nigeria. Working Paper No. 9804. National Bureau of Economic Research.
- Salandy M and Henry L (2013). The impact of capital flight on investment and growth in Trinidad and Tobago, 1971–2008.
- Sarr F and Savoy B (2018). The restitution of African cultural heritage. Toward a new relational ethics. Available at <http://restitutionreport2018.com/>.
- Sauvant KP and Sachs LE (2009). *The Effect of Treaties on Foreign Direct Investment: Bilateral Investment Treaties, Double Taxation Treaties and Investment Flows*. Oxford University Press. Oxford.
- Savoy B (2018). The restitution revolution begins. *The Art Newspaper*. 16 February. Available at <https://www.theartnewspaper.com/comment/the-restitution-revolution-begins>.
- Schjelderup G and Sorgard L (1997). Transfer pricing as a strategic device for decentralized multinationals. *International Tax and Public Finance*. 4(3):277–290.
- Schneider K and Buehn A (2013). Estimating the size of the shadow economy: Methods, problems and open questions. Working Paper Series No. 4448. Centre for Economic Studies Institute for Economic Research.
- Schneider K and Gugerty MK (2011). Agricultural productivity and poverty reduction: Linkages and pathways. *The Evans School Review*. 1(1).
- Schuster C and Davis J (2020). The value of mirror-trade data analysis for the detection of commodity-specific illicit outflows from Africa. Background document for the *Economic Development in Africa Report 2020*. UNCTAD.
- Sen A (1992). *Inequality Re-examined*. Harvard University Press.

- Sen A (1999). *Development as Freedom*. Anchor Books.
- Shimizu N and Rocamora AR (2016). Analysis of financial components of intended nationally determined contributions: Lessons for future NDCs[nationally determined contributions]. Working Paper. Institute for Global Environmental Strategies.
- Singer HW (1950). The distribution of gains between investing and borrowing countries. *The American Economic Review*. 40(2):473–485.
- Slany A, Chérel-Robson M and Picard L (2020). Illicit financial flows and sustainable development: Panel-data evidence for Africa. Background paper for *Economic Development in Africa Report 2020*. UNCTAD.
- Source Global Research (2019). *The Global Tax Market in 2019*. Available at <https://reports.sourceglobalresearch.com/report/5004/the-global-tax-market-in-2019>.
- StAR (2019). *International Partnerships on Asset Recovery: Overview and Global Directory of Networks*. World Bank. Washington, D.C.
- Stenberg K, Hanssen O, Edejer TT, Bertram , Brindley C, Meshreky A, Rosen JE, Stover J, Verboom P, Sanders R and Soucat A (2017). Financing transformative health systems towards achievement of the health Sustainable Development Goals: A model for projected resource needs in 67 low-income and middle-income countries. *Lancet Global Health*. 5(9):875–887.
- Stoop N, Verpoorten M and van der Windt P (2018). More legislation, more violence? The impact of Dodd-Frank in the DRC[Democratic Republic of the Congo]. *Public Library of Science One*. 13(8).
- Switzerland, Interdepartmental Coordinating Group on Combating Money-Laundering and the Financing of Terrorism (2015). Report on the national evaluation of the risks of money-laundering and terrorist financing in Switzerland.
- Tax Justice Network (2020). Financial Secrecy Index 2020 reports progress on global transparency – but backsliding from US[United States], Cayman [Islands] and UK[United Kingdom] prompts call for sanctions. Available at <https://www.taxjustice.net/2020/02/18/financial-secrecy-index-2020-reports-progress-on-global-transparency-but-backsliding-from-us-cayman-and-uk-prompts-call-for-sanctions/>.
- Thirtle C, Xavier I, Lin L, McKenzie-Hill V and Wiggins S (2001). Relationship between changes in agricultural productivity and the incidence of poverty in developing countries. Report No. 7946. Department for International Development.
- Torgler B (2002). Speaking to theorists and searching for facts: Tax morale and tax compliance in experiments. *Journal of Economic Surveys*. 16(5):657–683.

- Torgler B (2003). Tax morale in transition countries. *Post-Communist Economies*. 15(3):357–381.
- Tørsløv TR, Wier LS and Zucman G (2018). The missing profits of nations. Working Paper No. 24701. National Bureau of Economic Research.
- Trenczek J (2016). Promoting growth-enhancing structural change: Evidence from a panel of African, Asian and Latin American countries. Discussion Paper No. 207. Courant Research Centre. Göttingen, Germany.
- Tropina T (2016). Do digital technologies facilitate illicit financial flows? Background paper for the *World Development Report 2016*. World Bank.
- Uguru LC (2016). On the tax implications of capital flight: Evidence from Nigeria. *Journal of Research in Economics and International Finance*. 5(1):1–7.
- UN-Women (2018). *Turning Promises into Action: Gender Equality in the 2030 Agenda for Sustainable Development*. Available at <https://www.unwomen.org/digital-library/publications/2018/2/gender-equality-in-the-2030-agenda-for-sustainable-development-2018>.
- UN-Women (2019). The gender gap in agricultural productivity in sub-Saharan Africa: Causes, costs and solutions. Policy Brief No. 11.
- UNCTAD (2003). *Management of Capital Flows: Comparative Experiences and Implications for Africa* (United Nations publication. Sales No. E.03.II.D.20. New York and Geneva).
- UNCTAD (2013). Reform of investor–State dispute settlement: In search of a road map. International Investment Agreement Issues Note No. 2.
- UNCTAD (2014a). *Trade and Development Report, 2014: Global Governance and Policy Space for Development* (United Nations publication. Sales No. E.14.II.D.4. New York and Geneva).
- UNCTAD (2014b). *World Investment Report 2014: Investing in the SDGs[Sustainable Development Goals] – An Action Plan* (United Nations publication. Sales No. E.14.II.D.1. New York and Geneva).
- UNCTAD (2015a). *World Investment Report 2015: Reforming International Investment Governance* (United Nations publication. Sales No. E.15.II.D.5. New York and Geneva).
- UNCTAD (2015b). Investment policy framework for sustainable development. Available at <https://unctad.org/en/pages/PublicationWebflyer.aspx?publicationid=1437>.

- UNCTAD (2016). *Trade Misinvoicing in Primary Commodities in Developing Countries: The Cases of Chile, Côte d'Ivoire, Nigeria, South Africa and Zambia* (United Nations publication. Geneva and New York).
- UNCTAD (2017). *Commodities and Development Report 2017: Commodity Markets, Economic Growth and Development* (United Nations publication. Sales No. E.17.II.D.1. New York and Geneva).
- UNCTAD (2018). UNCTAD's reform package for the international investment regime. Geneva and New York.
- UNCTAD (2019a). *State of Commodity Dependence 2019* (United Nations publication. Sales No. E.19.II.D.8. New York and Geneva).
- UNCTAD (2019b). *Trade and Development Report, 2019: Financing a Global Green New Deal* (United Nations publication. Sales No. E.19.II.D.15. New York and Geneva).
- UNCTAD (2019c). Taking stock of international investment agreement reform: Recent developments. International Investment Agreement Issues Note No. 3.
- UNCTAD (2019d). *Commodities and Development Report 2019 – Commodity Dependence, Climate Change and the Paris Agreement* (United Nations publication. Sales No. E.19.II.D.8. New York and Geneva).
- UNCTAD and UNODC (forthcoming). Conceptual framework for the measurement of illicit financial flows.
- UNDP (2017). *Income Inequality Trends in Sub-Saharan Africa: Divergence, Determinants and Consequences*. New York.
- UNECA (2014). *A Country Mining Vision Guidebook: Domesticating the Africa Mining Vision*. Available at https://www.uneca.org/sites/default/files/PublicationFiles/country_mining_vision_guidebook.pdf.
- UNECA (2015). *Illicit Financial Flows: Report of the High-Level Panel on Illicit Financial Flows from Africa*. Available at <https://repository.uneca.org/bitstream/handle/10855/22695/b11524868.pdf>.
- UNECA (2016). *Greening Africa's Industrialization* (United Nations publication. Sales No. E.16.II.K.3. Addis Ababa).
- UNECA (2019). *Fiscal Policy for Financing Sustainable Development in Africa: Economic Report on Africa*. Addis Ababa.
- UNECA and African Minerals Development Centre. (2017). *Impact of Illicit Financial Flows on Domestic Resource Mobilization: Optimizing Revenues from the Mineral Sector in Africa*. Addis Ababa.

- UNECA and African Union (2011). *Minerals and Africa's Development: The International Study Group Report on Africa's Mineral Regimes*. UNECA. Addis Ababa.
- UNESCO (2015). *Education for All 2000–2015: Achievements and Challenges*. Paris.
- UNESCO (2018). *Fighting the Illicit Trafficking of Cultural Property: A Toolkit for European Judiciary and Law Enforcement*. Paris.
- UNFCCC (2015). Twenty-first Conference of the Parties Report Add.1 – Paris Agreement. FCCCP/CP/2015/10/Add.1. Paris.
- UNFCCC (2019). Background note on the \$100 billion goal in the context of UNFCCC process, in relation to advancing on SDG[Sustainable Development Goal] indicator 13.a.1. Available at https://unstats.un.org/sdgs/tierIII-indicators/files/13.a.1_Background.pdf.
- United Nations (2017). *United Nations Handbook on Selected Issues for Taxation of the Extractive Industries by Developing Countries*. New York.
- United Nations, General Assembly (2011). Twelfth United Nations Congress on Crime Prevention and Criminal Justice. A/RES/65/230. New York. 1 April.
- United Nations, General Assembly (2017a). Promotion of international cooperation to combat illicit financial flows in order to foster sustainable development. A/RES/71/213. New York. 18 January.
- United Nations, General Assembly (2017b). Research-based study on the impact of flow of funds of illicit origin and the non-repatriation thereof to the countries of origin on the enjoyment of human rights, including economic, social and cultural rights. A/HRC/36/52. New York. 9 August.
- United Nations, General Assembly (2019). Promotion of international cooperation to combat illicit financial flows and strengthen good practices on assets return to foster sustainable development. A/RES/73/222. New York. 10 January.
- United Nations, Security Council (2002). Final report of the Panel of Experts on the Illegal Exploitation of Natural Resources and Other Forms of Wealth of the Democratic Republic of the Congo. S/2002/1146. 16 October.
- United Nations, Security Council (2016). Letter dated 22 January 2016 from the Panel of Experts on South Sudan established pursuant to Security Council resolution 2206 (2015) addressed to the President of the Security Council. S/2016/70. 22 January.
- United Nations, Security Council (2019). Strengthening the partnership between the United Nations and the African Union on issues of peace and security in Africa, including on the work of the United Nations Office to the African Union Report of the Secretary-General. S/2019/759. 19 September.

- United Nations Conference on Trade and Employment (1948). The Havana Charter for an International Trade Organization. Article 55.
- United Nations Environment Programme (2016). *The Adaptation Gap Finance Report 2016*. Nairobi.
- United Nations University Press (2007). *Multilateralism Under Challenge? Power, International Order and Structural Change*. Tokyo.
- United States, Government Accountability Office (2015). Dodd-Frank regulations: Impacts on community banks, credit unions and systemically important institutions. Report to congressional addressees.
- UNODC (2011). Estimating illicit financial flows resulting from drug trafficking and other transnational organized crimes. Research report.
- UNODC (2018). *Global Study on Smuggling of Migrants* (United Nations publication. Sales No. E.18.IV.9. New York).
- UNODC and OECD (2016). Coherent policies for combating illicit financial flows. Issue Brief. Inter-Agency Task Force on Financing for Development.
- UNODC and World Bank (2007). Stolen Asset Recovery Initiative: Challenges, opportunities and action plan. Washington, D.C.
- UNSD (2008). *International Merchandise Trade Statistics: Supplement to the Compilers Manual* (United Nations publication. Sales No. E.08.XVII.9. New York).
- UNSD (2011). *International Merchandise Trade Statistics: Concepts and Definitions 2010*. Statistical Papers Series M No. 52.
- UNSD (2019). International merchandise trade statistics bilateral asymmetries: How to measure, analyse, reduce and way forward. Available at unstats.un.org/unsd/tradekb/Attachment441.aspx?AttachmentType=1.
- Usman FR and Arene CJ (2014). Effects of capital flight and its macroeconomic determinants in agricultural growth in Nigeria (1970–2013). *International Journal of Food and Agricultural Economics*. 2(4):107–126.
- van der Does de Willebois E, Halter EM, Harrison RA, Park JW and Sharman JC (2011). *The Puppet Masters: How the Corrupt Use Legal Structures to Hide Stolen Assets and What to Do About It*. World Bank. Washington, D.C.
- Vitola A and Senfelde M (2015). The role of institutions in economic performance. *Business: Theory and Practice*. 16(3):271–279.
- von der Goltz J and Barnwal P (2019). Mines: The local wealth and health effects of mineral mining in developing countries. *Journal of Development Economics*. 139(C):1–16.

- Waris A (2017). How Kenya has implemented and adjusted to the changes in international transfer pricing regulations: 1920–2016. Working Paper No. 69. ICTD.
- Waris A and Latif LA (2015). Towards establishing fiscal legitimacy through settled fiscal principles in global health financing. *Health Care Analysis: Journal of Health Philosophy and Policy*. 23(4):376–390.
- WCO (2018). Illicit financial flows via trade misinvoicing. Available at www.wcoomd.org/-/media/wco/public/global/pdf/media/newsroom/reports/2018/wco-study-report-on-iffs_tm.pdf?la=en
- Wei C (2015). Taxation of non-residents' capital gains. In: Trepelkov A, Tonino H and Halka D, eds., *United Nations Handbook on Selected Issues in Protecting the Tax Base of Developing Countries* (United Nations publication, New York).
- Wendling ZA, Emerson JW, Esty DC, Levy MA and de Sherbinin A (2018). *2018 Environmental Performance Index*. Yale Centre for Environmental Law and Policy. New Haven, United States.
- Wijnen W and de Goede J (2013). *The UN[United Nations] Model in Practice 1997 – 2013*. Available at <https://www.ibfd.org/sites/ibfd.org/files/content/pdf/UN-Model-in-Practice-%201997-2013-research-draft-by-IBFD.pdf>.
- Woodroffe N and Grice T (2019). *Beyond Revenues: Measuring and Valuing Environmental and Social Impacts in Extractive Sector Governance*. Natural Resource Governance Institute.
- World Bank (2004). Corruption and money-laundering: Concepts and practical applications. Module 1. Available at <http://pubdocs.worldbank.org/en/887011427730119189/AML-Module-1.pdf>.
- World Bank (2008). Democratic Republic of the Congo: Growth with governance in the mining sector. Report No. 43402-ZR.
- World Bank (2016). The World Bank Group's response to illicit financial flows: A stocktaking.
- World Bank (2017a). Illicit financial flows. Available at <https://www.worldbank.org/en/topic/financialsector/brief/illicit-financial-flows-iffs>.
- World Bank (2017b). *The Growing Role of Minerals and Metals for a Low Carbon Future*. Washington, D.C.
- World Bank (2018). *Poverty and Shared Prosperity 2018: Piecing Together the Poverty Puzzle*. Washington, D.C.
- World Bank (2019). *Illegal Logging, Fishing and Wildlife Trade: The Costs and How to Combat It*. Washington, D.C.

- World Bank (2020). *World Development Report 2020: Trading for Development in the Age of Global Value Chains*. Washington, D.C.
- World Economic Forum (2011). *Water Security: The Water-Food-Energy-Climate Nexus*. Island Press. Washington, D.C.
- World Economic Forum (2015). State of the illicit economy. Available at <http://reports.weforum.org/state-of-the-illicit-economy-briefing-papers-info/>.
- World Food Programme, United States (2017). *Winning the peace: Hunger and instability*. Washington, D.C.
- Yagboyaju DA and Akinola AO (2019). Nigerian State and the crisis of governance: A critical exposition. *SAGE Open*. 9(3).
- Yikona SM, Slot B, Geller M, Hansen B and El Kadiri F, eds. (2011). *Ill-Gotten Money and the Economy: Experiences from Malawi and Namibia*. World Bank. Washington, D.C.
- Yitzhaki S (1974). A note on income tax evasion. *Public Finance Quarterly*. 15(2):123–137.
- Zharan K and Bongaerts JC (2018). Survey on integrating of renewable energy into the mining industry. *Journal of Environmental Accounting and Management*. 6(2):149–165.
- Zucman G (2013). The missing wealth of nations: Are Europe and the US[United States] net debtors or net creditors? *Quarterly Journal of Economics*. 128(3):1321–1364.
- Zucman G (2014). Taxing across borders: Tracking personal wealth and corporate profits. *Journal of Economic Perspectives*. 28(4):121–148.
- Zucman G (2017). *La richesse cachée des nations : Enquête sur les paradis fiscaux*. La République des Idées. Paris.
- Zucman G (2019). Taxing multinational corporations in the twenty-first century. Research Brief 10. Economists for Inclusive Prosperity.