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The World Needs a Global Collective Action Strategy

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ABSTRACT

In order to establish global trade without corruption you need to create solid anti-corruption foundations. Despite the spending of billions of dollars over the last 15 years on anti-corruption measures, corruption is still endemic in the developing world.

To eradicate endemic and systemic corruption a ‘tipping point’ must be created to get all the actors to accept and adopt a new, corrupt free system.

One solution to this problem could be through the use of collective actions. Collective action is not a new concept; nevertheless it is only recently that it is growing in acceptance as a tool for business, civil society and policy makers to combat systemic corruption.

In this paper I will explain what form such a multi-stakeholder collective action strategy could take and the challenges that have to be overcome for an industry led collective action to be successful.

I will argue that for collective actions to be effective we need a multi-stakeholder collective action strategy that includes key international actors; enforcement agencies, policy makers, civil society, the development community and international business. I will use the maritime industry as a case study and through this lens will explain the challenges that can exist in an industry led collective action and how a multi-stakeholder collective action strategy can support such initiatives. I have chosen the maritime sector as this industry is already implementing collective actions. Additionally, and very importantly, about 90% of world trade flows through ports which are the market place where the international business community directly interacts with the developing world. As a result of these factors, and because ports are discrete places, they are a relatively manageable environment for collective actions to be developed.

Keywords

Maritime, anti-corruption, collective actions, ports, strategy, tipping-point

Introduction

Ending corruption is fundamental to ending poverty, but it is also essential for improving security and supporting democracy; its relevance is global, though its application has to be local. Yet despite the spending of billions of US\$ over the last 15 years on anti-corruption measures corruption is still endemic in the developing world (Khan, 2014).¹

Even though the idea of collective actions is not new, it is only just recently there has been a growing acceptance that collective actions are an important tool for business, civil society and policy makers to combat systemic corruption.² This is because collective actions can help address the second-order collective action dilemma that can arise when no agent-principal relationship exists (Ostrom, 1998).

The purpose of this paper is to argue that if collective actions are part of the solution then we need a multi-stakeholder strategy, which includes all the key stakeholders for them to be as effective as possible.

What I will seek to explain is how this strategy will significantly support the establishment of global trade without corruption. In particular I will discuss:

1. Why are collective actions important
2. The challenges in establishing an effective collective action
3. Why a multi-stakeholder collective action strategy is required and what one is
4. What form a multi-stakeholder collective action strategy could take

Additionally, I will use the maritime industry as a case study to illustrate how a multi-stakeholder collective action strategy could support the maritime industry in combatting systemic corruption.

¹ Khan argued that one can establish a link between corruption and economic development if one compares growth rates and levels of corruption after taking into account the different types of corruption. He argues that this explains why China, despite the overall high level of corruption, has been able to sustain high growth rates.

² Collective action refers to action taken by a group of people (individuals or other bodies) to achieve a common goal. They can take many forms such as declarations, integrity pacts, principle based initiatives and certifying business coalitions. The purpose of this paper is not to evaluate such forms of collective actions.

1. Why are collective actions important?

Tackling corruption in the developing world has been ineffectual for a variety of reasons. Firstly, it is very difficult to document and monitor corruption; the political environment in the recipient countries is often unstable and by their very nature corrupting. Additionally international businesses have exacerbated the problem by acquiescing to local custom and therefore reinforcing corrupt practices.

Historically the approach for tackling corruption has been focused on establishing the legal framework and related institutions. However, as Diamond (2007, p119) argued:

‘Endemic corruption is not some flaw that can be corrected with a technical fix or a political push. It is the way that the system works, and it is deeply embedded in the norms and expectations of political and social life’.

Therefore a new, alternative corrupt free system has to be created; however, this will be very difficult. The track record for ‘big ticket’ anti-corruption reforms is poor. One of the consequences of these failings is that the credibility of all anti-corruption reform is undermined (Ostrom, 1998). This often results in local and international stakeholders developing a cynical (and perhaps realistic) attitude where ‘even if most individuals morally disapprove of corruption and are fully aware of the negative consequences for the society at large, very few actors show a sustained willingness to fight it’ (Persson, Rothstein and Teorell, 2010, p1).

Rothstein (2011) contended that as people knew what was right and wrong, what was necessary was a change in belief about what other people would do in relation to corrupt practices, and that this could only be achieved through establishing a new equilibrium of social exchange. He argued that this equilibrium could only be attained through a ‘big bang’ approach to tackling corruption in order to create the necessary ‘tipping point’.

Therefore, in the absence of a Singapore type scenario of the 1950s, an alternative anti-corruption strategy is required to create the tipping point that is necessary for a corrupt free system to flourish.

In the push back against corruption there are things that one can do as an individual, a company, or even as part of a network, however, when encountering systemic corruption this is often insufficient to make a fundamental difference. This is because systemic corruption is ultimately a political problem, whilst the solutions are often technical, and the reason why a society is without endemic corruption is because a new cultural norm has been established. Because of this predicament corruption cannot be addressed in the same way as other development problems - a collective action solution is required.

2. The challenges in establishing an effective collective action

The challenges in seeking to establish and then implement anti-corruption collective actions are many fold. Some relate to the sensitive nature of the issues being discussed – potential illegal acts, the fear of whistle blowing, the concern of other companies (often their competitors) gaming any collective actions undertaken, as well as perceived anti-competition issues of engaging in an industry led collective action.

However, the two main challenges that I will focus on are free loading and power structures.

2.1 Free loading

Olson argued that where there were a large number of actors, such as in the maritime industry, then it was unlikely that a collective action would take place or fail due to the free loader hypothesis; namely, ‘rational, self-interested individuals will not act collectively to achieve their common or group interest’ (1965, p2). As a result it can be very challenging to recruit enough actors in order to make a collective action possible or effective. Olson’s hypothesis has been challenged by academics but Udehn (1993) argued that even though it was not an economic explanatory theory on collective actions it was a sound heuristic tool.

2.2 Power Structures

An additional problem for anti-corruption collective actions is the level of engagement with the local government, especially if they are the source of bribe demands. As contended by Hellman (2015), an individual’s preference to perform a corrupt act is likely to be exogenously given when operating in

an environment of systemic corruption due to power structures that prevail. This is pertinent when trying to address systemic corruption. Rothstein (2011) maintained that trying to address corruption in such environments using the classic agent-principal paradigm will not be effective when an individual's interests are not endogenously determined.

2.3 Solutions

Udehn (2011) reasoned that there are two principal ways of solving collective action problems. Firstly by changing the situation so that the problem disappears, which he called an institutional solution. Secondly relying on an individual's capacity for non-egoistical co-operation, which Udehn called the motivational solution.

In the maritime case study below I will focus on the institutional solution and discuss how this type of solution can be monetised, and how other stakeholders can help to address the free loading hypothesis and power structures problems.

3. Why a multi-stakeholder collective action strategy is required and what one is

'If you fight corruption, it fights you back' (Dugger, 2009, para. 8).

Currently in developing countries where the financial and political uncertainty is high, the level of support for a new corrupt free system by local stakeholders is not sufficient to make such a system sustainable.

The change required to reduce corruption creates a financial dilemma. Namely, the immediate financial gratification of receiving a bribe has to be deferred until the increase in trade compensates for the loss of earnings from not eliciting bribes.

'What is in it for us?', 'Why change?' This is the type of feedback that has been received from officials operating in the port.³ The likelihood of being caught is very low and, if caught, being prosecuted is just as remote. Therefore government officials that are not corrupt are perceived by their

³ MACN, UNDP, TUGAR report on corruption in Nigerian ports

peers and communities as being stupid (Rothstein, 2011). This logical, but immoral attitude helps to sustain endemic corruption. As a result local anti-corruption champions can often feel abandoned.

As argued by Gächter (2016, para. 2) 'corruption and fraud are things going on in the social environment all the time, and it's plausible that it shapes people's psychology and what they can get away with', resulting in the mind-set that 'It's Okay! Everybody does it around here'.

Therefore one of the key challenges is to convince the local and the international actors who interact with them that a new, corrupt free system is the better way to go.

An innovative way of breaking this deadlock is through a planned, sustained program of collective actions; however, for such an approach to be effective a multi-stakeholder collective action strategy is required. There several reasons for this. Firstly, stakeholders can support and encourage international business's engagement in collective actions, which can help eliminate the second-order collective action dilemma that can arise when no agent-principal relationship exists; in particular in the developing world. Secondly, governments are now acknowledging the impact of corruption on development, democracy and security and are seeking ways to combat it. As a result more governments such as the USA and the UK have established national anti-corruption strategies. Finally, many anti-corruption initiatives are being implemented such as the WTO's Trade Facilitation Agreement. As well, a growing number of collective action bodies and programmes are becoming established and collective actions being implemented. This is a very positive situation, but without a considered multi-stakeholder strategy we could be left with many disparate projects that fail to create a tipping point and or duplicate each other and fail to effectively utilise valuable resources.

As Persson et al argued, quoting Hart (2010, p21), 'To defeat the enemy one must first upset his equilibrium, which is not accomplished by the main attack, but must be done before the main attack can succeed'. She went on to contend, 'The "indirect strategy" implies that what is important is to upset ... changing what behaviour can be expected by "the others" in the corrupt game'.

A multi-stakeholder collective action strategy will more likely upset the equilibrium by reducing freeloading, overcoming political structures and resolving the second-order collective action dilemma than disparate programs that are not co-ordinated or part of a wider strategy.

4. What form a multi-stakeholder collective action strategy could take

The goal of a multi-stakeholder collective action strategy is not to create a bureaucratic process or body, but rather to establish a forum, resources and a framework for strategic partnering that stakeholders can utilise when they engage or establish a collective action.

Active dialogue and interaction is required by all the stakeholders. This cannot happen overnight – trust and ground rules have to be established. However, by creating a framework and a strategy then the success of individual collective actions increases through better outcomes and impacts. For example, reducing the time and cost of establishing and implementing the collective action, and helping to establish and support local anti-corruption champions and civil society. As a result these initiatives become sustainable and form the foundation of new corrupt free systems.

Every stakeholder is likely to have their own strategic plan and objectives. Ultimately, as an example, the enforcement agency's role is to enforce the law. Nevertheless it should be possible for some meaningful long-term and strategic engagement between key stakeholders. Every stakeholder should have their own collective action engagement strategy; even though the type of engagement possible may change from collective action to collective action. This strategy should comprise of two elements; one being how the stakeholder can effectively and collectively work with its peers. The second should include engagement with other stakeholders who are seeking to address corruption. This strategy should detail who they will engage with, how they will work collectively with other stakeholders and the timescales.

Below are some examples of the types of collaboration that are viewed through the lens of an industry led collective action.⁴ Please note that the purpose of this section is not to lobby for any particular action but rather to illustrate what type of collective interaction could be undertaken in order to support a wider collective action community and stakeholders.

4.1 Enforcement Agencies

In recent years the amount of collaboration between enforcement agencies has increased significantly which has had a positive effect on global enforcement.⁵ Nevertheless, there is finite amount of such resources which can impact on the number and type of prosecutions undertaken. However, the enforcement agencies, for example, with the recent recruitment of compliance officers, could signal to the wider business community their concerns and awareness of the challenges that exist in certain industries. In particular provide industry guides that detail what they would expect of a robust compliance program for that industry. This would help spur industry leaders to enforce and enhance better anti-corruption compliance programs.

4.2 Civil Society

The engagement of civil society is imperative for the success of a global collective action strategy. Active involvement can help to galvanise the business community. Additionally civil society is more likely to have a good network of contacts with local stakeholders who can help the delivery of industry led collective actions. Furthermore, civil society has an important role in challenging the enforcement agencies, policy makers and the aid and development community, as well as representing citizens around the world. Therefore when seeking the creation and implementation of a global collective action strategy one requires the active engagement and objective criticism that they can provide.

4.3 Governments - Policy Makers

Governments and policy makers have an important and active role to play in supporting collective actions. One of the challenges of implementing collective actions can be the lack of political

⁴ This exercise can be viewed through the lens of a different stakeholder

⁵ Such as mutual assistance programs

engagement locally. In such a scenario ‘flash action’ from likeminded governments – through, as an example, an ‘ambassadors club’ - could be sufficient to overcome local political intransience and thereby allow a technical solution to be implemented to a corruption problem. However, for this type of support to be effective and possible a framework needs to be established. Another challenge is the lack of engagement from the wider business community in collective actions. This in part could be overcome from government encouragement, such as was done in the early days of the EITI and the seed funding of anti-corruption initiatives to create momentum.

4.4 Development Community

One of the challenges in getting local stakeholders to accept a better and corrupt free system is that in the short term certain local actors will likely be financially worse off.⁶ In part, this may be related to local power structures, and the nature of certain demand led corruption.

This is where the development community has an important role. One way of establishing the connection between corrupt free systems and prosperity is to make aid dependent (even in some part) on tackling corruption. If the actors who seek bribes and their community could see a tangible link between supporting a corrupt free system and the aid that is donated then there is a chance that a virtuous cycle can be created. In addition, the development community can create pressure on the stakeholders within the international business community to support collective action initiatives.

DFID has already established national anti-corruption plans for its partner countries. Expanding these plans to include a collective action component, which in turn could feed into a wider UK national and global anticorruption strategy, would be an enhancement, as well as helping to establish local governance institutions and therefore address the aid problem as described by Deaton (2013).

4.5 Business Community

The business community whether local or international are often actors that are directly confronted on a daily basis with corruption; together with local citizens. Unlike local business and citizens, the international business community has a relatively mature compliance environment, and a greater

⁶ Experience from Maritime Anti-Corruption Network (MACN) Collective Actions

ability to push back and work collectively than the local business and citizens who can be more exposed to economic and physical intimidation and retaliation. As about 90% of world trade is transacted through the international supply chain the active engagement of the international business community is essential for effective collective actions in the developing world.

Conclusion

Ending corruption is fundamental to ending poverty, addressing security issues and supporting democracy. Now an opportunity exists to create a global collective action strategy that will enable collective actions to flourish and transform the lives of the next generation in the developing world.

Edward Ouko (2014, p1), auditor general of Kenya, said that, 'My ultimate goal is to see a time when we no longer hear of major corruption in Kenya'.

An effective way of supporting Ouko and the many others local champions like him is to adopt a global collective action strategy to create the tipping point necessary to eliminate endemic corruption. The best way to initiate a 'big bang' strategy is not through seeking 'big ticket' reforms in relative isolation, but through engagement at all levels and with all key stakeholders.

As Khan (2014) has contended, focus on the things that you can do something about - tackle corruption where you have the best chance of success. By working collectively we will be able to find more 'things' that we can do 'something about'.

Case Study - The Maritime Industry

1. Introduction

About 90% of world trade is transported by sea and passes through ports, therefore in order to establish global trade without corruption resolving the challenges that exist in the maritime industry is imperative (International Chamber of Shipping, 2014). Additionally, due to the diversity of cargo that passes through ports they impact on a wide variety of different industries; both locally and internationally. Also the international companies that operate in the maritime industry bring a relatively mature compliance perspective that could help to address the agent-principal problem that arises in the developing world (Persson, Rothstein and Teorell, 2010). As a result a ‘maritime anti-corruption collective action’ can become a ‘complete civil society’ initiative. Consequently, to establish global trade without corruption - corrupt free ports are necessary.

As ports are discrete locations with a limited number of actors, any port related collective action should be on a more manageable level than one operating with a wider scope. Therefore, in theory, it should be possible to create corrupt free ports - ‘islands of integrity’, which can be replicated globally. This should create a positive cycle as ports often compete against each other for cargo, and as a result would likely be commercially compelled to follow best practice adopted in other ports in order to retain and attract more business. In turn, these islands of integrity could create foundations from which corrupt free zones could be established thereby creating the missing tipping point. Additionally such maritime collective actions would help to develop local political capital and support civil society; both of which are lacking, but necessary in the developing world to establish meaningful second generation domestic anti-corruption reforms and programs.

Despite this positive scenario, maritime collective actions encounter significant challenges that could in part be addressed– through the establishment of a multi-stakeholder collective action strategy.

2. Maritime Collective Action Challenges

When compared to the extractive industries the type of corruption that occurs in ports is relatively low level in monetary terms, but occurs frequently. In this respect the corrosive effect of this type of corruption is the same as any other.

The nature of corruption in ports is primarily of two sorts; the demand and supply of bribes. Demand from a variety of government officials to enable a vessel to enter the port and access its services and the clearing of cargo through the port. The supply of bribes is from shipping companies and cargo owners who are prepared to circumvent local rules (Sequeira and Djankov, 2009).⁷ For some of these actors the supply side corruption is perceived as commercial extortion that is reluctantly paid as it is believed that there are no reliable government, NGO or enforcement bodies to protect them. Other actors use supply side corruption as a means of doing business – ‘the custom of the port’.⁸ Nevertheless, for many maritime companies the perceived outcomes in not making an illegal payment are either commercial duress or, depending on the facts, extortion if the safety of the vessel and or crew is at stake. As a consequence the balance of power is seen to reside with the local government officials who use their position of authority to extract the monies. However, to a certain extent, this assessment could be due to a degree of complacency, the failure to implement robust mitigations and to push back.

2.1 Freeloader Dilemma

Unlike other industry sectors such as the extractive industries, the ship owning community, which is a key component of the maritime industry, is highly fragmented with about 20,000 global ship owning companies. There are some very large shipping companies but, on average, a ship owning company will only own four vessels. Often these companies will be registered off-shore and owned by shareholders who do not see the relevance to them of international anti-corruption legislation. Nor are they concerned about being prosecuted. These industry dynamics form a classic Olson scenario

⁷ A shipping company being either a ship owner, who trades their own vessel or an operator who hires a vessel from a ship owner in order to trade the vessel

⁸ Legally still a bribe

where collective action would not work without selective incentives or the use of institutional solutions.

Nevertheless, despite these industry dynamics, since the 1990s, the maritime industry - through organisations such as the Oil Companies International Maritime Forum, Intertanko, Intercargo and Chemical Distribution Institute - has successfully collaborated and worked collectively to address health, safety and environmental issues relating to vessels. This has been achieved through the use of selective incentives by applying commercial pressure from, in this case, the extractive industry not hiring sub-trading vessels.

However, corruption is a much more sensitive issue to work collectively on with your peers, which creates an additional challenge to such collective actions.

As the threat of enforcement is insufficient to create a tipping point, the maritime industry's compliance with anti-corruption legislation has to be commercialised as it was for health and safety (Schelling, 1996). This could be achieved through the use of selective incentives, and the added value of a multi-stakeholder collective action strategy, to create an institutional solution as described by Udehn (1993).

2.2 Power Structures

Another significant challenge is that for a collective action to become established, local political engagement is necessary. Often it is employees of the government departments that require reforming who are making demands for bribes. As a result there can be little political will to change. Therefore multi-stakeholder support is required to try and break such an impasse.

3. Selective Incentives - Maritime Collective Actions

3.1 Maritime Anti-Corruption Network

In 2011, the Maritime Anti-Corruption Network (MACN) was created. This is an industry group that has been established for companies that operate within or are part of the maritime sector. The vision of MACN (2016) is a maritime industry free of corruption that enables fair trade to the benefit of society at large. The mission of the network is to promote good corporate practice for tackling

corruption in the maritime industry. The network also believes that it is imperative that there is collaboration between the key stakeholders in civil society, commercial enterprises and government bodies in order to identify and mitigate the root causes of corruption in the maritime industry through collective actions. One of the challenges for the MACN is the fragmented nature of the ship owning community. Despite growing very rapidly and having leading maritime companies as its members, the membership is about 70. At present there is very little incentive for ship owners and other maritime stakeholders to support the network – the rational approach would be to ‘free-load’. As a result the MACN has to ensure that it creates a ‘selective incentive’ for its members, or alternately they would have to monetise the recovery of collective action costs; either through the establishment of maritime development impact bonds or through revenue sharing arrangements with the local government.⁹ The revenue sharing arrangement would be financed by higher official fees being charged to all ship owners and operators, who in return receive corrupt free services in the port. Thereby institutionalising the collective action problem and resolving the free-loading dilemma.

3.2 Port Integrity Index

The creation of transparency is very important in confronting corruption. In this respect Transparency International (TI) has increased the awareness of corruption through the publication of its global corruption index. This has helped to promote a virtuous cycle where some countries aspire to improve their governance. However, one of the challenges for use of TI’s corruption index is that it is not specific enough to be of practical value when performing industry specific corruption risk assessments. As a result TRACE International has developed the TRACE Matrix, which measures business bribery risk in all countries across four domains – Business Interactions with Government, Anti-bribery Laws and Enforcement, Government and Civil Service Transparency, and the Capacity for Civil Society Oversight, including the role of the media – as well as nine sub-domains.¹⁰

⁹ Such bonds will be like development impact bonds but with the measurable outcome being corrupt free ports.

¹⁰ TRACE is a unique not-for-profit association of multinational corporations that specialises in anti-bribery compliance. The organisation works with hundreds of multinational companies as well as thousands of their third parties (such as agents, suppliers and distributors) to raise anti-bribery compliance standards and advance commercial transparency. TRACE is recognised by the anti-corruption authorities of the World Bank and the OECD, the USA, UK and other countries for its leadership in promoting corporate compliance, and yet remains completely autonomous without any public financing. TRACE Matrix was developed in collaboration

Even though the TRACE's Matrix is an advanced tool it is not a port specific integrity index. As a result TRACE International is in the process of developing a port specific tool based on a variety of risk, governance and transparency criteria.

This port integrity index could be a very important tool in reducing corruption. This is because ports often compete against each other within a region and or country for business, as well as internationally for trade and investment. In addition the index will enable those companies that trade internationally to be better informed about the corruption risks and the mitigations that they and members of their supply chain need to implement. As a result this port integrity index should provide a commercial incentive for change, as well as helping to create political capital and support for local anti-corruption champions in their roles.¹¹

3.3 Due Diligence Compliance - Vessels

Currently the physical vessel has to be vetted from a safety and environmental compliance perspective - ensuring the vessel is seaworthy and complies with all the international maritime legislation.¹² Robust processes, procedures and platforms exist to enable the supply chain members to do this.

However, one of the main due diligence challenges in the maritime industry is the registration of vessels through off-shore companies. This can be illustrated in the contracting process used to hire a vessel. Hiring a vessel can be very stressful due to commercial considerations, time differences, number of parties involved in the transaction and the lack of transparency over vessel ownership. As a result, depending on the shipping markets, a company seeking to hire a vessel may only have one or two hours to make their 'legally binding decision' to hire the vessel, which, in conjunction with the use of off-shore companies, creates significant compliance challenges.

with RAND Corporation. The TRACE Matrix provides the business community with a powerful new tool for anti-bribery risk assessment.

¹¹ Often corrupt officials deny the existence of corruption if there is no evidence. The MACN collects this evidence from its members. In addition the report card will collate the corruption risks, which will help make the existing corrupt practices more transparent.

¹² All vessels have to be registered with a nation - a flag state that performs vessel safety and compliance audits. In addition a vessel has to be classified with a 'Classification Society' that also performs audits on the vessel and its technical ship manager. As well, when a vessel calls into a port then that nation's port state control can also audit the vessel to ensure that it is seaworthy.

As a result there is a need for a robust due diligence vetting process of the owner of the vessel. Therefore TRACE International has entered into a partnership with a vessel vetting platform called Rightship, whereby vessel owners who have been TRACE certified will be able to have this information displayed on the platform.¹³ The availability of this information will provide the large listed trading and extractive companies that use Rightship with the opportunity to stipulate that they have a 'preference' to hire vessels from ship owners who have been certified in this manner, which should have the impact of commercialising and raising the importance and relevance of anti-corruption legislation within the ocean transportation industry.¹⁴

4. Multi-Stakeholder Collective Action Strategy

The aforementioned collective action initiatives are necessary for a maritime industry free of corruption, but they may not be sufficient when encountering systemic corruption or would be more effective with the existence of a multi-stakeholder collective action strategy. As an example, other stakeholders can provide support that could reduce the free-loader mind set of certain actors or address political intransience that can arise; the resolution of these issues is necessary in order to resolve the second-order collective action dilemma that arises when no agent-principal relationship exists. However, for this to be effective a framework for such interaction should be established at a strategic level rather than being created on a case by case basis. Nevertheless the type of support will vary from collective action to collective action. Detailed below are some ways this support could manifest itself.

4.1 Enforcement Agencies

Enforcement agencies can engage by signalling to the maritime industry and its customers their awareness of the challenges in the maritime sector. Providing industry related compliance guidance; including the type of mitigations that they would expect to be in place in a robust compliance program. This would provide valuable information that would help enable trading and extractive industry

¹³ Rightship vet about 77,000 vessels that trade globally based on about 50 different risk factors. TRACE certification is a gold standard due diligence process used to vet medium to high risk third parties.

¹⁴ This information will also be available on TRACE's website

companies to ensure that their maritime and supply compliance programs were robust – in a similar manner to what has been achieved in maritime safety.

4.2 Governments

Governments could create an ‘ambassadors club’ of likeminded governments to encourage the meaningful engagement of local stakeholders in maritime related collective actions. An example of this is in Argentina where one government department is actively engaged in a collective action, whilst another refuses any form of engagement. An ‘ambassadors club’ would help the progress of this collective action.

4.3 Development

One could link development to the eradication of corruption by connecting support for trade and anti-corruption collective actions into their development programs.

4.4 International Business

International Business to acknowledge the unique position that the maritime industry has in helping to create positive change in the developing world through championing maritime collective actions, and ensure that their supply chain has robust compliance programs in place.

4.5 Civil Society

Challenge all these stakeholders to work sensibly and collectively to create change.

In conclusion addressing maritime corruption cannot be achieved in the same manner as other developmental challenges. Nor can this be achieved by individual stakeholders working in isolation. Only by key stakeholders collaborating and engaging collectively can enough momentum be generated for change to occur and for that change to be sustainable. For that engagement to be of value a multi-stakeholder collective actions strategy should be established.

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