

# BLOW THE WHISTLE: LAND CORRUPTION IS A CRIME. IT IS HIGH TIME TO BREAK THE SILENCE.

POLICY PAPER ON LAND CORRUPTION IN WEST AFRICA  
-MAY 2019

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According to research by Transparency International<sup>1</sup>, nearly four out of five people in low-income countries consider corruption in the land sector a serious problem and every second citizen in Africa has recently been affected by land corruption<sup>1</sup>. However, bribes in land acquisition are widely considered a regular part of the deal.

All over West Africa women are complaining that their male family members took the lands they were depending on and the houses they were living in<sup>1</sup>. Due to lack of access to land, young women and young men are sidelined from business activities while poor people see their lands taken over by powerful politicians and international investors. But, few ideas on how to protect vulnerable populations are put forward.

According to a study by Transparency International<sup>1</sup>, nearly four out of five people in low-income countries consider corruption in the land sector a serious problem and every second a citizen in Africa has recently been affected by land corruption<sup>1</sup>. Rural and poor women are especially vulnerable to land corruption. They are also exposed to other gender-specific forms of corruption, including sexual extortion<sup>1</sup>.

In the land sector, corruption risks can be found on three levels: first in the management of state-owned land; then in the administration of land; and finally in all processes and decisions related to land use planning<sup>1</sup>. African land governance is neither resilient against corruption nor strong enough to confront and handle global demand for land. Only one per cent of land in Sub-Saharan Africa is registered in a cadastre.

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## CORRUPTION RISKS IN THE LAND SECTOR: DUAL SYSTEM OF LAND OWNERSHIP, LAND GRABBING AND POOR GOVERNANCE

A dual system of land ownership, based both on statutory and customary law, makes purchasing land challenging in West Africa. Buyers find it easier to bribe their way through the bureaucratic jungle rather than comply with the exhausting and complicated procedures of land acquisition. Women, excluded from land ownership by customary heritage laws<sup>i</sup> in most West African societies, face specific forms of discrimination and are especially exposed to corruption.

Large-scale land acquisition is a major concern of civil society organisations (CSOs) as well as experts in food security. Land Matrix<sup>ii</sup>, a platform monitoring large-scale land acquisitions, stated in 2016 that more than 80 per cent of the land acquired had not been developed. Five million hectares in West Africa, equivalent to the size of five million football fields, have been sold to foreign investors. An average farm in West Africa covers one to two hectares of land.

Large-scale land acquisition for industrial farming or speculation thus translates into loss of access to land. It also means that up to five million households are unable to legally farm on inherited lands to sustain the livelihoods. The shadowy character of these land deals is confirmed by studies, which show that in Sub-Saharan Africa, a process of community consultation to obtain Free, Prior and Informed Consent is only conducted in 14 per cent of cases, with another 43 per cent of cases undergoing only a limited form of consultation.

Only limited data are available about the widespread corruption in the land sector in West Africa. Lack of trust in the justice system means that victims of land corruption are reluctant to complain and seek justice.

The purpose of this regional policy paper is to highlight corruption risks and challenges in the land sector in West Africa, and to give civil society and regional bodies arguments and background information to propose measures that address the identified risks and challenges at regional level, in line with internationally agreed standards and practices.

Globally, Africa has been spearheading the development of a comprehensive continental land policy clearly denouncing corruption, but far more needs to be done to rid the region of land corruption. The Economic Organisation of West African States (ECOWAS), founded in 1975, has been crucial in the development of the African Union (AU) Land Policy and subsequent frameworks. It has also enabled the domestication of international agreements to combat corruption and in launching initiatives against corruption. This paper provides recommendations for the 15 ECOWAS member states to implement these obligations and monitor progress.

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## LAND MATRIX

The crowd-sourced platform and land observatory was launched in 2012. Worldwide Land Matrix has documented 1,204 completed deals covering 42.2 million hectares. One hundred and sixty-seven of these deals, covering five million hectares, took place in West Africa. Since the financial crisis of 2007/08, the region is one of the most significant targets for major agricultural investments with 12 per cent of all reported deals worldwide. Planned deals target a further four million hectares. Only 13 per cent of the lands acquired so far have been developed to a level they can be productive.

## FREE PRIOR INFORMED CONSENT (FPIC)

Free, Prior and Informed Consent (FPIC) is an internationally acknowledged standard embedded in the universal right to self-determination, along with Indigenous Peoples' rights to lands, territories and natural resources. The normative framework for FPIC consists of a series of international legal instruments including the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).

## ECOWAS

The Economic Organisation of West African States was founded in 1975. Member states are Benin, Côte d'Ivoire, Gambia, Ghana, Guinea, Guinea-Bissau, Liberia, Mali, Niger, Nigeria, Senegal, Sierra Leone, Togo, and Burkina Faso. Mauritania left in 2002. Morocco is geographically not in West Africa but the country applied for membership in 2017. Cameroon is geographically in West Africa but not a member of ECOWAS.

# ANTI-CORRUPTION POLICIES

## LAND CORRUPTION IS RARELY PUNISHED

In 2016, Transparency International called for corruption-free land governance worldwide.<sup>iii</sup> Several international frameworks, such as the United Nations (UN) 2030 Agenda for Sustainable Development, contain provisions to fight injustice and corruption in land governance<sup>iv</sup>.

While financial enrichment, embezzlement and bribes are well known criminal offences, land corruption is rarely punished and widely considered a “peccadillo” – a trivial offense. Irregular flows of money in the form of “drink money”, “transport money” as well as the silent acceptance of “greasing the wheels” of bureaucracy through financial or other favours and services are widespread. The worst cases involve the extortion of sexual services in exchange for land.

Demands for improved transparency and integrity in the land sector<sup>v</sup> have entered discussions on land governance. Yet, direct tools and advocacy to combat corruption and institutionalise accountability are still missing.

Most ECOWAS countries have ratified the UN Convention Against Corruption (UNCAC)<sup>vi</sup>. Only Liberia, Niger, and Guinea Bissau have “accessed” status, but have not yet ratified the convention. The African Union Convention on Preventing and Combatting Corruption<sup>vii</sup> has been ratified by all ECOWAS member states, except Cabo Verde.

The AU and UN Conventions (both introduced in 2003) provide clear anti-corruption policies and practices in the form of preventive anti-corruption bodies as well as obligations like public reporting, access to information and whistleblower protection<sup>viii</sup>. The related ECOWAS Protocol on the Fight against Corruption<sup>ix</sup> stipulates the obligations of member states and enforces the regulation through its Community Court of Justice and the Council of Ministers.

The AU Convention and ECOWAS Protocol contain similar articles, but stipulate different procedures in reference to private sector corruption<sup>x</sup>. Accordingly, GIABA follows a comprehensive approach to include Designated Non-Financial Businesses and Professions (DNFBPs) to implement Anti-Money Laundering mechanisms.

Money laundering and the financing of terrorism are closely linked to and enabled by corruption. ECOWAS launched the Intergovernmental Action Group against Money Laundering in West Africa (GIABA) in Dakar, Senegal in 2012, as a regional body similar to the Financial Action Task Force (FATF) equipped with a financial intelligence unit and powers to investigate and prosecute. GIABA also supports the new Whistleblowing Strategy of ECOWAS (2016). In early 2017, ECOWAS launched its Civil Society Platform on Transparency and Accountability in Governance (ECSOPTAG)<sup>1</sup> to implement the strategy.

## THE UNITED NATIONS CONVENTION AGAINST CORRUPTION (UNCAC)

The United Nations Convention against Corruption is the only legally binding universal anti-corruption instrument. A key chapter of the Convention focuses on asset recovery to return assets to their rightful owners.

## ACTION GROUP AGAINST MONEY LAUNDERING IN WEST AFRICA (GIABA)

In 2010, GIABA stated: “Some money laundering trends noted in the region include direct cash purchase of properties; use of third parties or front men to purchase properties; and use of fictitious names to purchase property. Also, politically exposed persons (PEPs) are regularly involved in real estate acquisitions both at home and abroad using proceeds from corruption.” For example, most investigated, prosecuted or convicted public officials in Nigeria used ill-gotten funds to acquire land or luxury properties.

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## ANTI-CORRUPTION POLICIES TACKLING CORRUPT PRACTICES

ECOWAS adopted the Whistleblower Protection Strategy in 2016. Technical stakeholders gathered in Liberia and issued the Monrovia Statement on Whistleblower and Witness Protection in West Africa, which includes a country-specific list of actions and recommendations<sup>xi</sup>.

Land corruption can be investigated and prosecuted in accordance with all three legal instruments of the UN Convention Against Corruption (UNCAC). In cases of corrupt land allocation and registration by public institutions (land commissions), for instance, Article 17 (Embezzlement, misappropriation or other diversion of property by a public official), Article 19 (Abuse of functions) and Article 20 (Illicit enrichment) could be applied.

Land and real estate acquisitions are among ways organised crime launders money<sup>xii</sup> and terrorist organisations finance their activities<sup>xiii</sup>. Tackling these issues is increasingly urgent. Boko Haram in Northeast Nigeria and the Lake Chad region, Al Qaeda in the Islamic Maghreb (AQIM) as well as other Islamic terrorist groups in the Sahel are building their support systems with the help of local businesses. UNCAC provides regulations to combat such activities, with Article 23 (Laundering of proceeds of crime) and Article 31 (Freezing, seizure and confiscation) providing the legal framework for effective action.

Taking into consideration that women, small holders and poor urban population are most affected by land corruption, regional and national bodies should strictly apply UNCAC Article 53 (Measures for direct recovery of property: mechanisms for return of assets/ property and compensation for the land users). The most vulnerable rely on their lands for daily survival and shelter and they cannot afford to wait for a court decision issued months or even years later.

### UEMOA/ WAEMU

In 2011, the Francophone West African Economic and Monetary Union (UEMOA in French) adopted a public sector-oriented approach to tackle corruption. UEMOA estimates that corruption costs Africa between 25 per cent and 50 per cent of its Gross Domestic Product (GDP), depending on the country and level of corruption in the public sector. Anti-corruption measures were included in UEMOA directives<sup>xiv</sup> related to public sector reform. National governments have launched hotlines to report corruption (green telephone or téléphone vert in French) in Burkina Faso (2011), Chad (2018), Togo (Zero Tolerance) and Morocco (2015).

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# TRANSPARENCY IN THE LAND SECTOR

## LEGAL FRAMEWORK

### THE AFRICA LAND POLICY

Tackling land corruption is intrinsically linked to improving governance in the land sector. Africa has stepped up efforts to improve land governance since the early 2000s. Already in 2006, a tripartite consortium of the African Union Commission (AUC), the United Nations Economic Commission for Africa (UNECA) and the African Development Bank (AfDB), launched the Land Policy Initiative<sup>xv</sup>, which resulted in the endorsement of the African Land Policy<sup>xvi</sup> by the African Union Summit of Heads of State and Governments in Sirte, Libya in 2009.

To counter land grabbing in Africa, which increased after the global financial crisis in 2007-08, the African Union developed the Guiding Principles on Large-Scale Land-Based Investments (LSLBI) in 2012.<sup>xvii</sup> These guiding principles were based on universal frameworks, in particular the Voluntary Guidelines on the Responsible Governance of Tenure (VGGT), also adopted in 2012, and the UN Declaration of Indigenous Rights (2007).

The Guiding Principles on Large Scale Land Based Investment in Africa emphasize the need for transparency and accountability in land-based investments.

Chapter 7 is dedicated to “Cooperation, Mutual Accountability and Monitoring & Evaluation”. Fundamental Principle 3 states that “Decisions on LSLBI and their implementation are based on good governance, including transparency” and Principle 4 says that “Member States have the responsibility to promote transparency of all parties throughout the investment process”. Thus, Africa’s leaders have provided a strong mandate to address transparency and accountability for good land governance, in particular in relation to large land deals<sup>1</sup>.

The roadmap to implement The Africa Land Policy – The Framework and Guidelines on Land Policy in Africa (F&G) – was elaborated by the Land Policy Initiative (LPI), based in Addis Ababa. Through tremendous efforts, a survey of all land policies in Africa was undertaken. The West African Assessment<sup>xviii</sup> formed the basis for the ECOWAS Land Policy, which was accepted by member states but never published.

The ECOWAS Commission formulated a policy aimed at harmonising land issues within ECOWAS, followed by a draft directive, which was validated by the land and cadastral experts of the member states in 2013 at Abuja<sup>xix</sup>. It was subsequently submitted to the member states for amendments and comments. The directive was rejected by the member states with the recommendation that it should be discussed further in the ECOWAS Parliament. This has yet to happen. Neither the policy nor the directive have ever been shared with civil society.

### LAND POLICY INITIATIVE

The Land Policy Initiative (LCI) is based in Addis Ababa, Ethiopia. Its secretariat is assisted by an African Taskforce on Land.

LCI is a joint programme of the tripartite consortium consisting of the African Union Commission (AUC), the African Development Bank (AfDB) and the United Nations Economic Commission for Africa (ECA). Its purpose is to enable the use of land to lend impetus to the process of African development.

### THE LAND OBSERVATORY WEST AFRICA

The first studies toward implementing a land observatory date back to 2003. Initiatives were launched by UEMOA (West African Economic Money Union), CLISS (Committee for Drought Control in the Sahel) and ECOWAS, but only UEMOA established a small office in Ouagadougou, Burkina Faso, in UEMOA premises. ECOWAS has expressed its wish to join the observatory, with the support of LPI, since 2014.

### THE ECOWAS COURT OF JUSTICE

The ECOWAS Community Court of Justice is handling cases of land injustices, but it lacks a legal framework to investigate corruption. The Court has jurisdiction to determine cases of violation of human rights when member states fail to protect their citizens.

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In a parallel effort, the West African Economic and Money Union (UEMOA) is setting up a land observatory<sup>xx</sup> in Ouagadougou to follow up on the LPI West Africa Assessment (Land Policy Initiative of UNECA). Negotiations to have the observatory integrated into ECOWAS have been on-going for more than five years. The observatory has never been launched officially and publicly.

## INTEGRITY IN THE LAND SECTOR INTERNATIONAL OBLIGATIONS

The Voluntary Guidelines on Responsible Governance of Tenure of Land, Fisheries and Forests (VGGT) provide standards by which civil society, at both a national and international level, can hold governments to account. They therefore constitute a good first step.

Transparency, including transparency of policies, laws and procedures as well as of all transactions in tenure rights (Para 3B.8, 5.5, 12.3, 12.5), features prominently as an essential implementation principle (par. 3B.8). The enactment of legislation mandating transparent administration and transactions of tenure rights can support efforts to reduce rent seeking, corruption and mismanagement.

### UN-HABITAT

While the Africa Land Policy and the VGGT focus on land grabbing in the rural sector, UN-Habitat has developed policies and tools to protect slum dwellers and irregular settlements in the urban sector. UN-Habitat launched the Global Land Tool Network in 2007 and developed several practical tools<sup>xxi</sup> in a joint venture with International Institute for Geo-Information Science and Earth Observation (ITC) to enhance the capacity for transparency in land administration. While these tools have been popularised in East Africa, ECOWAS countries are lagging behind and face serious problems with real estate corruption in urban areas, due to unregistered lands. Ghana and Nigeria have moved from 'Opaque' to 'Low Transparency' in 2016 on the Transparency International Real Estate Corruption Index,<sup>xxii</sup> which shows the increased corruption risk in the urban land sector.

### SUSTAINABLE DEVELOPMENT GOALS

UN member states endorsed the 2030 Agenda, a set of 17 global goals<sup>xxiii</sup> to be achieved in a 15-year period. The 2030 Agenda for Sustainable Development (SDGs) contains land-related targets and indicators under SDGs 1, 2, 5, 11 and 15. Many land organisations and stakeholders are committed to fully implementing the SDGs and to monitoring land-related indicators in order to promote responsible land governance. Land is a significant resource, both cross-cutting and critical to achieving the SDGs.

## THE VOLUNTARY GUIDELINES ON RESPONSIBLE GOVERNANCE OF TENURE OF LAND, FISHERIES AND FORESTS (VGGT)

A voluntary commitment for responsible investors, the VGGT are not an enforceable law, but more a tool for lobbying and for NGOs entering into a mediation process with investors. The VGGT also advocate for fair land transactions, including the protection of formal and informal tenure rights; tasks and responsibilities for states and private business; and transparency and accountability in land transactions.

Corruption represents a major obstacle to reaching all the SDG goals<sup>xxiv</sup> as it hampers economic growth and increases poverty, depriving the most marginalised groups of equitable access to vital services such as healthcare, education, water and sanitation. Nor is corruption only an issue for low-income states: rich countries must take action on cross-border corruption, foreign bribery, tax evasion and related illicit financial flows, which collectively deprive developing countries of around US\$ 1.26 trillion per year.

Goal 16 on peace, justice and strong institutions includes commitments to fight corruption, increase transparency, tackle illicit financial flows and improve access to information.

## RECOMMENDATIONS TO COUNTERACT LAND CORRUPTION

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- **Extend the Whistleblower Strategy to land corruption** and harmonise it with the efforts of UEMOA, BAD/ AfDB and other stakeholders as well as the Monrovia Declaration.
- Establish a **whistleblower mechanism at the UEMOA/ ECOWAS land observatory with powers to investigate, prosecute and punish corruption** in cooperation with GIABA and the ECOWAS Court of Justice for cases of LSLBI, with support from international investors, governments, (ECOWAS) investment agencies and/or international donor organisations.
- Work with **traditional chiefs and religious leaders** to increase sensitisation on (land) corruption, the Whistleblower Strategy and anti-corruption laws via the West Africa Civil Society Forum (WACSOFF), ECSOPTAG and other relevant platforms.

TO THE COUNCIL OF MINISTERS AND NATIONAL PARLIAMENTS

- Encourage the application of **UNCAC** Chapter III Criminalization and law enforcement on land corruption. **Domesticate and harmonise related clauses and regulations, and empower relevant bodies to investigate, prosecute and punish.**
- Establish a **Code of Conduct** for land commissions and a **reporting system** on (large scale) land acquisitions to be scrutinised by media and civil society.
- Implement **legal redress procedures** and institutions for corruption cases.
- **Sensitise judicial staff** on (land) corruption and legal provisions against it.

TO CIVIL SOCIETY, MEDIA AND INTERNATIONAL DONORS

## MEASURES TO ADDRESS THE CHALLENGES AND RISKS

Two major challenges are addressed in this paper:

- a) The reluctance of victims to denounce offenders and report land corruption to police and courts.
- b) The lack of compliance with international and regional frameworks aimed at increasing transparency and indirectly reducing corruption.

## PRACTICAL SOLUTIONS

As a practical solution, ECOWAS and its member states are encouraged to develop a mechanism to report and prosecute land corruption via

- a) The inclusion of land corruption into the ECOWAS whistle blower initiative;
- b) The use of the planned land observatory as whistle blower, mediator and prosecutor;
- c) The inclusion of land corruption into the overall fight against corruption.

Civil society and international donors are encouraged to develop model solutions to help the region tackle the acceptance of bribes in the land sector as well as creative ideas on how to denounce corruption.

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- Strengthen your efforts to address, **investigate and highlight land corruption** in your advocacy work and publications.
  - Encourage and support citizens **to report land corruption** to the relevant authorities, using available platforms including Transparency International Advocacy and Legal Advice Centres (ALAC).
  - Provide funding and initiate projects to **create and promote model solutions on anti-land corruption**, for instance how to tackle corruption, arraign offenders and compensate victims.

## RECOMMENDATIONS TO INCREASE INTEGRITY AND TRANSPARENCY IN THE LAND SECTOR

TO THE ECOWAS SUMMIT OF HEADS OF STATES AND GOVERNMENTS AND THE ECOWAS PARLIAMENT

- **Form a multi-stakeholder working group on land**, accessible by media and civil society, to improve transparency on ECOWAS level.
- **Domesticate at ECOWAS level the AU Land Policy and its Framework and Guidelines, VGGT, AU Guiding Principles on LSLBI** and include **lessons learned and best practices** from member states.
- **Harmonise the application of VGGT and bottom-up transparency in land governance across sectors – women, agriculture, trade and human rights – and transform it into a comprehensive ECOWAS Land Policy.**
- **Review and ratify the abandoned ECOWAS directive to implement VGGT and the AU Africa Land Policy**, especially articles concerning land corruption and transparency. Monitor implementation and publish progress reports.
- Develop and implement a **tracking system to monitor** the ECOWAS Land Policy and publish results.
- **Start an Open Data initiative on LSLBI in West Africa via the ECOWAS Investment Agency.** Call upon member states to join. Ask donors for assistance based on the experiences from the mining sector (EITI, Open contracts, ECOWAS directive for the mining sector).
- Conclude negotiations for the integration of the **UEMOA Land Observatory** with ECOWAS and transform the observatory into a monitoring tool of civil society (ECOWAS of the people) with complaint and whistleblowing mechanisms. Install an ombudsman for civil society and ordinary citizens.
- **Publish the ECOWAS Land Policy, land policies under ECOWAP and efforts to harmonise AU guidelines on LSLBI and related publications, to enable** civil society organisations and media **scrutiny.**
- **Enter into dialogue** with civil society and especially **women representatives** on the ECOWAS Land Policy and related



directive, the harmonisation and implementation of the AU guidelines on LSLBI and the Voluntary Guidelines (VGGT). Use the Civil Society Organisations-Land Policy Initiative Platform to conduct dialogue (CSO-LPI).

## RECOMMENDATIONS TO INCREASE INTEGRITY AND TRANSPARENCY IN THE LAND SECTOR

TO THE GOVERNMENTS AND NATIONAL PARLIAMENTS OF  
ECOWAS MEMBER STATES

- Develop **protection mechanisms for women and communities** who denounce abuses and corrupt practices in the domain of land (bottom-up accountability mechanisms), introduce ombudsmen and whistleblowing mechanisms at local level.
- **Review land acts to implement AU / ECOWAS Land Policy and its Framework and Guidelines, VGGT, AU Guiding Principles on LSLBI and lessons learned from best practices in other member states to improve land governance and integrity in land administration.**
- **Institutionalise VGGT standards** in cases of compulsory acquisition and other forms of land acquisition by the state for larger investments.
- Start **codification, simplification and registration of customary land rights** of men and women, and include land (use) rights of herdsman, fisher folks, communities and cooperatives. Introduce **Alternative Land registration** (such as the Social Tenure Domain Model (STDM) as well as an **Alternative Conflict Resolution** mechanism or establish an **independent grievance redress mechanism** to support complainants and address fear of reprisal attacks or victimisation.
- **Introduce a proper cadastral and land use information database** for state, private and customary lands. **Include use rights and a land valuation mechanism.** Make sure that a sufficient budget is allocated for this purpose.
- Review the reform of **land administration** and related institutions in order to include a (digital) system of registration of titles, cadastral mapping and land information, and harmonise unclear tenure forms under customary and statutory law as well as overlapping jurisdictions for statutory and customary law.
- Ensure that the **land allocation and adjudication process** is transparent and equitable. Publish available lands, make sure that community consultations are taking place according to international standards and include women in all steps of the

## ALTERNATIVE LAND REGISTRATION

The Social Tenure Domain Model 4 (STMD) has been well-tried in East African countries. Using small computers or even phones to film the property evidence of land and its state of development and thus a document for registration can easily be produced. NGOs are adding geo-spatial data to create their own data base of land ownership for people who don't have access to land registries or cadastres.

## COMPLIANCE WITH FPIC

The PDIDAS (Développement Inclusif et Durable de l'Agribusiness au Sénégal) in Saint-Louis has embedded FPIC as fundamental principle of investment projects. The government is giving out land to the communities who negotiate a contract with potential investors according to VGGT standards.

## ALTERNATIVE CONFLICT RESOLUTION

Customary court or religious bodies have a good record on sorting out land disputes on a local level. There are also good experiences with ad hoc formed complaint bodies in case of infra-structure projects or large scale land acquisitions by foreign investors. International Land Coalition provides a lot of manuals and tools how to organize communities and set up platforms for conflict prevention.

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decision making process. Harmonise allocation and adjudication processes of different institutions (such as investment agencies, land commissions, ministries and local land bodies).

## Land corruption is a crime.

### It is high time to “break the silence”.

Whether it is an opaque deal between private investors and local authorities, citizens having to pay bribes for land administration processes or customary laws that deny women their land rights, land corruption hits the poor and marginalised hardest. Land corruption in rural areas can sap the entrepreneurial spirit of young people and restrict their access to employment, thus driving migration to overcrowded urban centres. The consequences are food insecurity, an increased risk of conflict and a threat to traditional ways of life. Land corruption eats away at national economies and stands in the way of achieving the Sustainable Development Goals.

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<sup>i</sup> Impact of Land Corruption on Women, Transparency International 2018  
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<sup>ii</sup> Land Matrix <http://www.landmatrix.org/en/>

<sup>iii</sup> TI Resolution on Corruption-Free Land Governance worldwide  
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<sup>iv</sup> Key International Frameworks, GLTN 2017 <https://gltn.net/home/2017/11/03/land-governance-a-review-and-analysis-of-key-international-frameworks/>

<sup>v</sup> U4 Expert Answer 2016, Corruption Risks in Land Administration  
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<sup>vi</sup> UN Convention Against Corruption  
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<sup>vii</sup> African Union Convention on Preventing and Combating Corruption  
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<sup>viii</sup> Anti-Corruption Conventions in Africa, TI 2006  
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<sup>ix</sup> ECOWAS Protocol on the Fight against corruption  
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<sup>x</sup> Anti-Corruption Instruments of the African Union and Regional Economic Communities  
<http://www.u4.no/publications/anti-corruption-instruments-of-the-african-union-and-regional-economic-communities/>

<sup>xi</sup> Monrovia Statement on Whistleblower and Witness Protection 2016,  
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[s/Monrovia\\_Statement\\_on\\_Whistle-Blower\\_and\\_Witness\\_Protection\\_-\\_EN\\_-\\_21\\_09\\_2016.pdf](#)

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xiii Terrorist Financing in West and Central Africa, GIABA 2016  
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xiv Directives of UEMOA related to the public sector  
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xvi LPI provides here all relevant documents in reference to the Africa Land Policy  
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xvii Guiding Principles on LSLBI, UNECA 2012  
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