

Comparative Analysis of Anti-Corruption Elements of the Reform Strategy

The Independent Joint Anti-Corruption Monitoring & Evaluation Committee (MEC) report dated October 2018 suggested 191 recommendations to the MOMP. One of the recommendation (R-50) which is related to Research & Policy Development Directorate is conducting a comparative analysis of the anti-corruption elements of the Reform Strategy. Therefore, this task is performed by R & D Directorate. The purpose of this task is to find out whether there is any element in the Reform Strategy that paves ways for corruption.

- I. The MoMP Reform Strategy has five pillars:
 1. Institutional Reform and Development.
 2. Geological Data Acquisition & Management.
 3. Contract Management & Compliance.
 4. Transparent & Accountable Governance.
 5. Growth & Enabling Environment.
- II. The five pillars are studies and below are the findings:
 1. **Institutional Reform & Development**
This pillar has six sub-components. Component 5 of this pillar (Development of E-governance Systems) is cardinal in tackling the corruption.
 2. **Geological Data Acquisition & Management**
This pillar has five components. This pillar consists technical issues such as survey and geological data acquisition & management.
 3. **Contract Management & Compliance**
This pillar has six components. Three components of this pillar specifically addresses the issues of tackling corruption in the ministry are as follow:
 - **Component 3: Streamlining and Digitization of the Cadaster System.** The Mining Cadaster Administration System; development of the Mining Cadaster Administration System (MCAS) & Non-Tax Revenue System (NTRS) has been deployed in the cadaster department and data entry process for the contract payment is already underway. The adoption of these two systems are practical steps in ensuring robust efficient revenue collection, robust contract management and adherence to international transparency benchmarks.
 - **Component 4: Create an Efficient Revenue Collection and Reporting System.** The Ministry will work with the Ministry of Finance to establish a separate dedicated account/sub-account for extractives revenue.
 - **Component 5: Streamlining and Digitization of the Mining Inspection System.** The system will also be digitized to make sure that reporting is recorded, and to facilitate improved communication between inspectors, the Ministry and contractors.

4. Transparent & Accountable Governance

This pillar has six components. In a way, all of the components of this pillar are practical measures are necessary to curb the corruption. However, four components below specifically addresses to tackle the corruption:

-
- **Component 2:** Improvement of the Legal and Regulatory Framework Development of Robust Minerals and Hydrocarbons.
 - **Component 3:** Development of Robust Minerals and Hydrocarbons Fiscal Regime. It would make sure in creating a sustainable and transparent fiscal regime applicable to all minerals and hydrocarbon contracts.
 - **Component 4:** Ensure Compliance with Transparency Standards and Donor Benchmarks. MoMP is committed to align itself with EITI transparency standards.
 - **Component 5:** Curbing Illegal Mining and ASM Formalization. ASM formalization strategy is developed and approved by the cabinet.

5. Growth & Enabling Environment

This pillar has seven components. This pillar consists focused on the growth and expansion of the mining industry in Afghanistan.

III. Conclusion

- a. The Reform Strategy has five pillars & thirty components.
- b. Eight components of the reform strategy is specifically focused on tackling the corruption in the ministry. In other word, 26% of the Reform Strategy is diverted to curb the corruption in the ministry.
- c. It is worth mention that there is no clause or article in the reform strategy which pave ways for corruption.

-End-

Date: 09-14-2019

To: H.E. Nargis Nehan, Acting Minister of Ministry of Mines and Petroleum

From: Research & Policy Development Directorate

Subject: MEC Recommendations Comparison with the Reform Strategy

The Independent Joint Anti-Corruption Monitoring & Evaluation Committee (MEC) report dated October 2018 suggested 191 recommendations to the MOMP. One of the recommendation which is related to Research & Policy Development Directorate is conducting a comparative analysis of the anti-corruption elements of the Reform Strategy and recommendations of MEC. Therefore Research & Policy Development Directorate undertook the task.

- I. MEC recommendations are summarized into three categories, which are briefly explained below:
1. Recommendations included in reform strategy: 104 recommendations included.
 2. Recommendations included in the ministry action plan: 73 recommendations included.
 3. Recommendations irrelevant to the MOMP: 14 recommendations are concerning ministry of finance, NEPA & IDLG.
- II. The below table illustrates the aforementioned four categories of MEC recommendations.

	Included in the Reform Strategy	Included in MOMP action plan	Not directly related to MOMP
	R1, R6, R10, R11, R12, R13, R14, R15, R16, R24, R25, R26, R27, R28, R29, R30, R31, R33, R37, R38, R39, R50, R51, R52, R53, R55, R56, R58, R59, R70, R72, R73, R78, R83, R86, R88, R89, R90, R93, R94, R95, R96, R97, R98, R99, R100, R101, R102, R103, R014, R015,	R2, R7, R8, R9, R17, R23, R32, R34, R35, R36, R40, R41, R42, R43, R44, R47, R54, R60, R61, R62, R63, R64, R65, R66, R67, R68, R69, R71, R74, R75, R76, R77, R79, R80, R81, R82, R84, R85, R87, R91, R92, R109, R136, R137, R138, R140, R141, R153, R154, R155, R156, R157, R161, R163, R164, R165, R166, R167, R168, R169, R170,	R3, R4, R5, R18, R19, R20, R21, R22, R45, R46, R48, R49, R57, R182

	R106, R107, R018, R110, R11, R112, R113, R114, R115, R116, R117, R118, R119, R120, R121, R122, R123, R124, R125,	R171, R172, R173, R174, R175, R176, R177, R179, R181, R184, R185, R186	
	R126, R127, R128, R129, R130, R131, R132, R133, R134, R135, R139, R140, R141, R142, R143, R144, R145, R146, R147, R148, R149, R150, R151, R152, R158, R162, R159, R160, R178 R180, R183, R187, R188, R189		
Total	104	73	14

III. **Conclusion:** As explained above, the MEC recommendations are included either in the Reform Strategy, Mineral Law or Action Plan. Therefore, amendment of the Reform Strategy is not required.

-End-