What is the "anti-corruption" norm in global politics? Norm robustness and contestation in the transnational governance of corruption

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1. Introduction

The global norm of anti-corruption emerged as a force in world politics during the 1990s. Enacted in a complex cluster of policy initiatives across a variety of international governmental and non-governmental organizations, in the private sector, and in government agencies around the world, "anti-corruption" is a rallying cry that raises few outright opponents. Today a robust global regime of anti-corruption norms and rules guides the transnational governance of corruption, institutionalized across multiple international treaties, regional bodies, non-governmental advocacy networks, and policies.

Despite extensive anti-corruption efforts at the global and transnational levels, however, corruption remains a serious problem in much of the world. Major corruption scandals in Brazil, South Korea, Honduras, and Guatemala reveal the intimate and illicit connections between business and government as serious threats to democratic institutions and political stability. Patterns of enforcement of the U.S. Foreign Corrupt Practices Act (FCPA) suggest that bribery remains routine in international business transactions. Endemic bribery and grand corruption in the arms trade, in natural resource extraction, and in domestic political arrangements remain fixtures in much of the world. In U.S. politics, unprecedented and unmitigated intermingling of presidential power with private personal and corporate interests indicate a shift towards systematized corruption and kleptocracy.

What do ongoing patterns of corruption in the global economy and in various political systems tell us about the legitimacy, relevance, or effectiveness of the transnational governance of corruption? Do repeated violations of global anti-corruption initiatives indicate the erosion of the norm of anti-corruption? Recent contributions to norms theory in International Relations

offer a useful conceptual toolkit with which to consider these questions. Building on Antje Weiner's theory of contestation as a meta-organizing principle of governance in the global realm, Nicole Deitelhoff and Lisbeth Zimmermann have developed a typology of norm contestation based on a theory of law and normativity to explain the conditions under which contestation might variously weaken or strengthen a norm: different kinds of contestation impact norms differently [i]. Whereas contestation over a norm's *validity* can weaken it, contestation over a norm's *application* can strengthen it, indicating norm vitality and robustness. We apply Deitelhoff and Zimmermann's theoretical framework of norm robustness and contestation to map out the impact of the anti-corruption norm in the transnational governance of corruption [ii]. Drawing on evidence from our respective research projects on the global governance of corruption, including both qualitative evidence and quantitative measures of treaty implementation and compliance, our analysis shows that anti-corruption remains quite a robust global norm, although important areas of contestation are also at play.

Scholars of International Relations have produced a lot of research about the emergence, institutionalization, and possible erosion of various prohibition norms in global politics including, for example, norms against apartheid [iii], human trafficking [iv], chemical weapons [v], wartime plunder [vi], slavery [vii], mercenaries [viii], targeted killing [ix], nuclear weapons [x], and money laundering [xi]. Relatively few IR scholars have explored these questions in relation to the global norm against corruption [xii]. By the same token, while there is a good deal of research on corruption and anti-corruption policies in national and local contexts, less empirical research takes into account the international politics of anti-corruption efforts at the global level. Our research in this chapter therefore provides a starting point for a deeper exploration of the anti-corruption norm in global politics. Above all, this chapter highlights a demand for further research in the anti-corruption field on the relationship between contestation and robustness of the anti-corruption norm in global politics and on the impact of emerging sources of contestation, particularly with respect to the scope of the norm and the transnational advocacy strategies of its proponents.

In the next section, we sketch the emergence of the anti-corruption norm that arose in world politics in the 1990s, and describe its main elements. In part 3, we analyze evidence of the anti-corruption norm's robustness in global politics, according to five indicators: public acceptance, treaty ratifications, institutionalization, compliance, and reactions to norm violations [xiii]. While

the evidence pertaining to the first three indicators suggests quite a robust norm in global politics, evidence pertaining to reactions to norm violations and behavioral compliance is more difficult to assess. Part 4 delves into aspects of norm contestation. Drawing on evidence relating to the UN Convention Against Corruption in particular, the discussion illuminates the tension between anti-corruption treaty implementation and sovereignty-based claims for policy autonomy as well the challenges of anti-corruption treaty implementation in various contexts. In addition, we describe emerging sources of contestation within the discourse of anti-corruption, having to do with debates about the appropriate scope of anti-corruption advocacy and its strategies. Section 5 concludes with some thoughts on directions for further research.

2. What is the anti-corruption norm in global politics?

Unlike other more longstanding prohibition norms in world politics, the norm against corruption in global politics is relatively new. This new global norm arose in the mid-1990s, when the problem of corruption became entangled in post-Cold War international policy debates surrounding economic and political globalization. As scholarly research began to show that countries with high levels of corruption displayed lower levels of investment, lower economic growth rates, skewed government expenditures, and other problems of serious concern to the liberal international political and economic system [xiv], international organizations started to link solutions for the control of corruption – transparency, democracy, and market liberalization – to the objectives and interests of an open global economy [xv]. Suddenly corruption – previously considered a domestic political concern and a taboo topic for international governmental organizations – became a global issue, eliciting a global response [xvi].

Alongside this "eruption" of corruption as a global issue [xvii], a new normative consensus emerged. As evidence of the political, economic, institutional, and social costs of corruption mounted, a "critical mass" of opinion accumulated, asserting that "corruption is no longer an acceptable phenomenon."[xviii] Whereas previously an attitude held sway that considered corruption in the developed world to be natural, expected, and in several respects beneficial to economic political development [xix], a new consensus now demanded a universal principle of bribe-free markets and governments on economic, diplomatic, moral, and political grounds.[xx] As one British official noted in 2002,

> the entire business environment and attitude towards corruption and bribery is changing. In a relatively short period of time, the issue of corruption has moved from being a subject, which at best was not discussed, to one which is now stringently challenged and opposed by a number of large multilateral organisations.[xxi]

These developments produced a "norm cascade" of anti-corruption in world politics and a period of rapid institutionalization of the anti-corruption norm [xxii]. In short order the United States spearheaded the creation of an Inter-American Convention against corruption and promoted the internationalization of its Foreign Corrupt Practices Act through the OECD, leading to an international treaty to criminalize the bribery of foreign public officials in international business transactions [xxiii]. The Council of Europe created a Criminal Law Convention on Corruption and the Group of States against Corruption [xxiv] . The IMF took up anti-corruption in its good governance initiatives and the World Bank, committed to the fight against it, identified corruption as "the single greatest obstacle to economic and social development."[xxv] The United Nations created a multilateral Convention Against Corruption, signed by 140 states and ratified by all but 16.[xxvi]

In addition to international law and governmental initiatives, anti-corruption activity in global policies unfolded in non-governmental transnational advocacy and through private sector initiatives. The transnational NGO Transparency International emerged alongside other anti-corruption advocacy networks as a leading and highly influential voice against corruption in global politics [xxvii]. The UNCAC Civil Society Coalition, which unites over 350 civil society organizations from over 100 countries in a global network, aimed at promoting the ratification, implementation, and monitoring of the UNCAC. The longstanding series of International Anti-Corruption Conferences (IACC), a bi-annual forum for debate and exchange "that brings together heads of state, civil society, the private sector and more to tackle the increasingly sophisticated challenges posed by corruption" gained steam. The conferences attract up to 1500 participants from over 135 countries, serving as a leading global forum for anti-corruption advocacy and action, on a global and national level, among citizens and institutions around the world [xxviii]

In terms of private governance initiatives, the UN Global Compact added anti-corruption as its tenth principle. The OECD promulgated Guidelines for Multinational Enterprises, which

include standards on combating bribery, bribe solicitation, and extortion, provide policy frameworks within which firms voluntarily promote anti-corruption as part of a broader agenda of corporate social responsibility. The World Economic Forum's Partnering Against Corruption Initiative promotes a "zero tolerance" approach to bribery and corruption in international business.

This list of international treaties, policy initiatives, advocacy statements, and instances of global attention to the problem of corruption is hardly exhaustive. What is apparent is that a norm of anti-corruption has taken root in global politics. Several elements of the anti-corruption trace a common thread; here we highlight four key notions embedded in the anti-corruption norm as it has become institutionalized in global politics. There are the notions that corruption is dysfunctional, corruption is wrong, corruption is transactional, and corruption is (de)limited.

Corruption is dysfunctional. Drawing on a basic definition of corruption as the misuse or abuse of public power for private gain [xxix], the anti-corruption norm asserts that corruption is harmful to economic growth and development, to profit-driven business, and to both productivity and fairness in an open, liberal, global economic order. The idea that corruption is dysfunctional in politics and economic activity comes from a raft of research asserting that corruption distorts markets, disrupts international flows of goods and capital, and reduces economic growth. Corruption also impedes sustainable development and perpetuates poverty, and it undermines democracy, human rights, and human security.

Corruption is wrong. The anti-corruption norm asserts not only that corruption is dysfunctional, leading to inefficient outcomes, it is also morally wrong [xxx]. The misuse of public power for private gain, the transfer of illicit funds from rich countries to poor countries – as in the widespread practice of transnational business bribery – and the facilitation of kleptocratic theft from poor countries to rich countries, are construed by the anti-corruption norm as unethical and immoral, and counter to the values and principles of fairness and liberal democracy, in every part of the world.

Corruption is transactional. Corruption, a concept notoriously difficult to define precisely, includes such varied and widespread aspects as nepotism, kleptocracy, cultural practices such as

guan-xi, black-marketeering, and the pursuit of advantage through both licit and illicit social networks. As it has been institutionalized in global politics however, the anti-corruption norm is mainly identified with transactional bribery – that is a focus on corruption as an illicit economic exchange between parties. This take on corruption ignores how corruption can be embedded in social and political networks, including elite institutions, patron-client relationships, and criminal networks. It also ignores the ways in which corruption is not always as obvious as the payment of money in exchange for services rendered, the perversion of agency relationships by third parties, or "the abuse of entrusted power for private gain." It can be much more subtle (and also deeply, societally-entrenched), having to do with longstanding relationships of mutual benefit, exchanges of favours among people in advantageous positions, and expectations of reciprocity within ongoing relationships maintained by exclusive networks of trust – both licit and illicit.

Corruption is (de)limited. As it has been institutionalized as a norm against transactional bribery, the global norm of anti-corruption includes an emphasis on individual accountability norms [xxxi] and excludes a more complex, networked, and systemic perspective on corruption. (Gutterman, 2016a, 2016b). In other words the norm as it has been institutionalized in various ways at the global level implies a focus on "bad apples"; it discourages a critical analysis of the corruption-generating features of the international political economy as a whole. Thus the anti-corruption regime can be understood as a program of "normalisation" within the international political economy [xxxii]. This is a program explicitly seeking policy reform along neoliberal lines without fundamentally challenging any of the powerful actors or structures that are at the root of complex corruption problems. As such, proposals for change within the anti-corruption regime "fit" with other dominant international policy norms as well as with the ideologies of the leading states.

Although we can trace these common features, the scope and meaning of the anti-corruption norm in global politics is not settled. As the discussion below will show, significant elements of the norm as it originally emerged in the 1990s became institutionalized and continue to display significant indicators of robustness. That is, this norm remains legitimate, relevant, and effective to some extent in some capacity. At the same time, emerging sources of contestation suggest that actors have embarked on pathways to norm change.

3. How robust is the global norm of anti-corruption?

Deitelhoff and Zimmermann [xxxiii] propose that the robustness of a global norm can be assessed through five indicators: (1) *norm acceptance*, as indicated by opinion polls or public debates; (2) *third party reactions to norm violations*, that is whether others react in a positive, neutral or negative way to instances of non-compliance (for instance, through sanctions or just public statements in favor of or against a norm violation); (3) *ratifications* of international treaties about the norm; (4) *compliance*, that is the extent to which actors behave consistently with the norm; and (5) *institutionalization*, that is "adoption into domestic law, creation of domestic or regional institutions; inclusion in international institutions' protocols and standards."

Analyzing the global norm of anti-corruption through these indicators, we find that on acceptance, ratifications, and institutionalisation there is a clear pattern of norm robustness. However, reactions to norm violations and patterns of behavioral compliance are more difficult to assess.

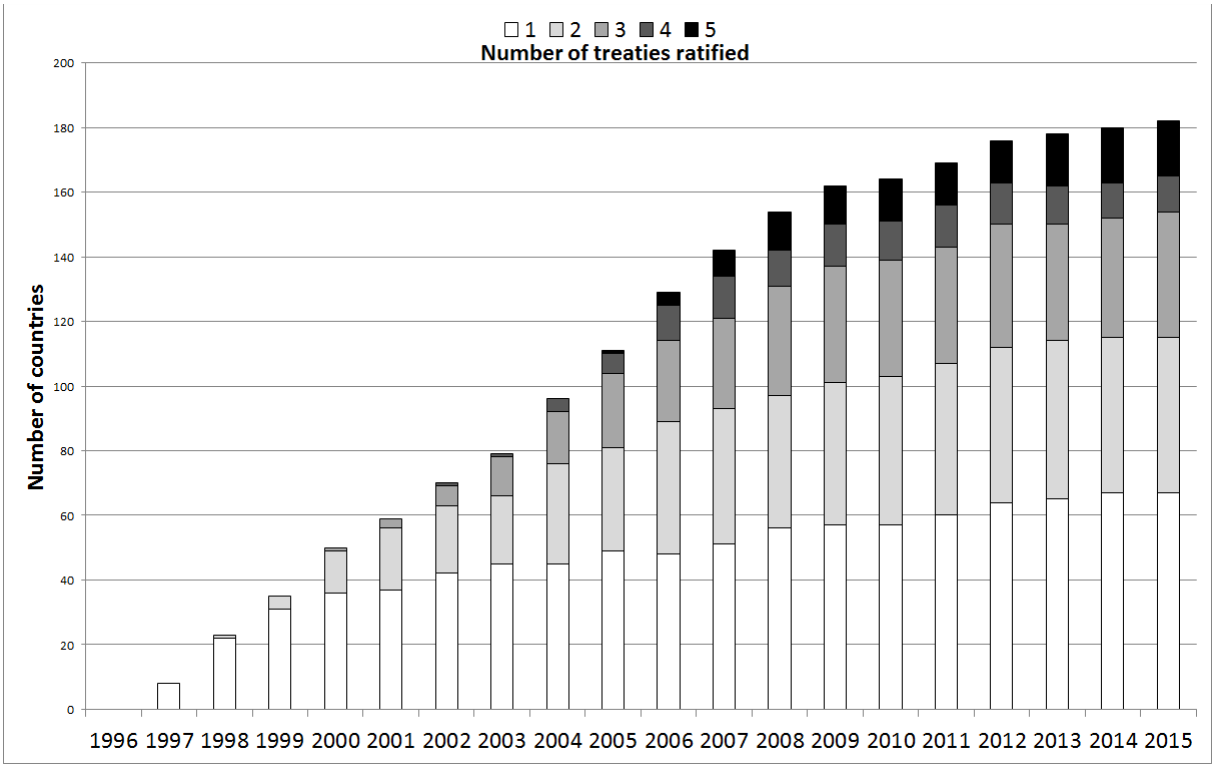
Public acceptance, treaty ratifications, and institutionalization

In the literature on the fight against corruption, it is often claimed that nobody can publicly take a stance in defense of corrupt behavior as the phenomenon is universally condemned as "bad" or evil (cf. Bukovansky 2002). Corruption ranks a highly salient issue in opinion polls around the world. For opposition politicians, positioning themselves as anti-corruption has become an important discursive strategy. To name just one recent example, consider the massive public protests in the small Eastern European nation of Romania: In response to a proposed law that would have eased the penalties for high-level politicians convicted of corruption, Romanians took to the streets and forced the government to withdraw the proposal [xxxiv]. Another example is the series of scandals in Brazil, which forced politicians to resign and continues to dominate headlines in the region [xxxv]. Protests during the Arab Spring were to a significant extent motivated by corruption, too [xxxvi]. Judging by the standard of public acceptance, anti-corruption is a robust norm indeed.

When it comes to the ratification of treaties, there is equally clear evidence of norm robustness. Figure 1 shows that more than 180 states are party to at least one international anti-

corruption treaty. As of 2015, 115 governments had ratified two or more treaties on the issue of corruption; there was a group of 17 states with obligations under five different treaties. As discussed in the previous section, anti-corruption has emerged on the global agenda and has been codified in international treaties at the regional and global level. The 2003 UN Convention Against Corruption entered into force in 2005 and counts 181 state parties as of early 2017.

Figure 1: State ratifications of anti-corruption agreements



In addition to the UN, regional and international organizations have adopted binding anti-corruption agreements, sometimes focused on a subset of issues: The Organization of American States (1996), European Union (1997), OECD (1997), Council of Europe (1999), Southern African Development Community (2001), Economic Community of West African States (2001), African Union (2003), and League of Arab States (2010). It should be noted that not all of these agreements have been ratified by all of the respective member states. At the same time, there are many non-binding documents in which states publicly announce their willingness to tackle corruption, which we have not listed here. By the standard of international treaties, it thus appears that anti-corruption is a robust international norm.

The "eruption" of anti-corruption at the global level, describe above, exemplifies institutionalization. This is true for the activities of international institutions and organizations, which increasingly integrate the fight against corruption into their policy output, as mentioned above. At the domestic level, laws and institutions have proliferated throughout the last two decades. Now, "virtually every country has domestic [anti-corruption] laws covering its public officials" [xxxvii]. The UN Office on Drugs and Crime offers a website to track the myriad of national anti-corruption legislation, including changes over time.[1] One particularly visible innovation is that of national anti-corruption agencies. The UNCAC as well as other treaties urge member states to create specialized bodies tasked with the prevention and, at times, prosecution of corruption. Until 1990, less than 20 such bodies existed; by 2012, 150 countries had national ACAs [xxxviii]. Anti-corruption has become a core part of domestic legislation, is often bolstered by specialized institutitions, and has been mainstreamed into regulatory provisions covering aspects such as recruitment, procurement, and codes of conduct for public officials.

Compliance and Third-Party Reactions

Deitelhoff and Zimmermann's final two indicators, reactions to norm violations and behavioral compliance with the norm, are more difficult to assess.

At the international level, consider development policy and peacebuilding. The World Bank and the IMF became hubs of anti-corruption work, hosting many of the researchers that contributed to the change in academic consensus during the 1990s (Wedel 2012, p. 463). The World Bank in particular became a "teacher of norms" by advocating for reform and by implementing anti-corruption measures as central part of its programming [xxxix]. Since this shift in policy, the Bank aims to assist countries with domestic good-governance reforms. As part of conditionality it also considers corruption indicators when assessing country performance and making procurement decisions. Firms involved in corruption can be temporarily banned from bidding for World Bank contracts – and this debarment process is now co-ordinated with other, regional development banks for added impact [xl]. In bilateral development cooperation,

[1] http://www.track.unodc.org/LegalLibrary/Pages/AllLegalResources.aspx

corruption has equally become a part of conditionality and impact assessment – perhaps most evident in, but not limited to, the European Union's neighborhood policy [xli]. In that sense, one can speak of a sanctions regime aimed at states found in violation of the anti-corruption norm. The fight against corruption has also entered the agenda with regard to post-conflict peacebuilding and power-sharing [xlii].

The proliferation of laws and rules at the domestic and at the international level, however, cannot be assumed to automatically induce perfect compliance with the norm. There is no clear evidence that corruption is decreasing around the globe. In fact, a new dataset on corruption even suggests a trend towards higher levels of corruption according to expert assessments [xliii]. So far, quantitative empirical work has not shown a link between commitments to international agreements and a reduction in corruption at the national level [xliv].

Another aspect to consider with regard to behavioral compliance is the enforcement of laws against foreign bribery in accordance with the 1997 OECD Convention. OECD member states have pledged to prosecute corporations for corrupt behavior occurring abroad, using their jurisdiction on the home base of multinationals. Yet since the agreement entered into force, enforcement has been very selective. The U.S. government has acted as a leader and trendsetter to some extent, prompting more activity from others [xlv]. 2016 has been called a "record-breaking year" in terms of FCPA enforcement action given the number of cases and the magnitude of settlement payments (Koehler 2017). However, based on data reported by member states up until the end of 2015, the OECD notes that 24 out of the 41 parties to its agreement "have never sanctioned an individual or an entity for foreign bribery since the Convention entered into force in 1999" (OECD 2016), Recent trends in the United States and some other countries notwithstanding, OECD members seem reluctant or unable to exercise more control over corporate behavior abroad. The enforcement of legislation against foreign bribery is thus an interesting test case both for behavioral compliance and for sanctions – suggesting a mixed record in both areas.

4. Contestation in the international regime of anti-corruption

As the discussion so far has shown, anti-corruption has experienced a stellar rise on the global agenda, evolving from a taboo topic during the Cold War era into a cluster of norms backed by a UN convention as well as multiple other international treaties. As we have discussed, the norm appears robust in terms of public acceptance, international treaty ratification and institutionalization. Regarding compliance and sanctions against violators, the evidence is less clear. But to what extent is anti-corruption actively contested? Not surprisingly, contestation dates back to the early days of norm emergence at the global level. Already during negotiations about the OECD convention, recipients of the global norm contested US leadership in this area and contested the strategic trade orientation of the nascent anti-bribery norm,

In the following sections, we will focus on three broad areas of contestation: One concerns the tension between sovereignty and externally prescribed good governance. The second type of contestations occurs whenever it comes to the everyday implementation of broad international anti-corruption norms.[2] Finally, new elements of contestation within the regime continue to emerge, relating the meaning and scope of the norm, as well to norm framing in transnational advocacy.

It also seems useful to consider the temporal dimension of contestation. Some of the examples below concern issues that have always been contested within the anti-corruption debates. In other instances, we see a slow-down or loss of momentum – or even backlashes against the seemingly dominant tide of anti-corruption.

Sovereignty and policy autonomy

By definition, international anti-corruption norms are highly intrusive and thus vulnerable to contestation based on sovereignty concerns. By prescribing norms of how government officials, politicians and members of the judiciary ought to behave, international anti-corruption treaties curtail the regulatory autonomy of states. Outright corruption has been illegal in many jurisdictions for a long time, so one might argue that such treaties mostly codify what has already been common sense. Looking at the wide range of contents included in international anti-

[2] As Deitelhoff and Zimmermann have pointed out, applicatory contestation might be "validity contestation in disguise".

corruption agreements, however, it becomes evident that they have broader consequences for sovereignty. To some extent, anti-corruption mirrors the developments of the human rights agenda, which also created rules and institutions that undermine state autonomy and sovereignty. In both cases, advocates give very good reasons for the legitimacy of this endeavor – but governments have not always agreed

The UNCAC offers a compelling example of this tension. Consider first the way in which international anti-corruption norms interfere with domestic legal frameworks and policymaking. The wording of UNCAC's provisions shows the tension between sovereignty concerns and the willingness to create meaningful international commitments. Article 4 notes that:

> *"1. States Parties shall carry out their obligations under this Convention in a manner consistent with the principles of sovereign equality and territorial integrity of States and that of non-intervention in the domestic affairs of other States.*
>
> *2. Nothing in this Convention shall entitle a State Party to undertake in the territory of another State the exercise of jurisdiction and performance of functions that are reserved exclusively for the authorities of that other State by its domestic law."*

As Cecily Rose has pointed out, this language seems to be symbolic rather than serving a functional purpose. Through article 4 the signatory states can express their "lingering concerns about the degree to which they have subjected themselves to obligations that touch on matters of domestic criminal justice, which have traditionally fallen into the category of 'domestic affairs'" [xlvi]. Yet by creating an international legal instrument that addresses corruption, states parties have explicitly removed the issue from their exclusive domestic jurisdiction. So article 4 has little legal or political relevance beyond the symbolic effect.

Beyond the explicit nod to sovereignty in article 4, analyzing UNCAC as a whole reveals much more about the sovereignty concerns inherent to the anti-corruption norm. On the one hand, the treaty is more comprehensive than earlier anti-corruption agreements; this could be interpreted as evidence that the idea of anti-corruption has broadened over time and grown more robust. On the other hand, many UNCAC provisions allow for exceptions based on domestic laws or are entirely optional [xlvii]. Apparently the negotiators faced a trade-off between comprehensiveness and legal obligation, with the result that many compromises were made in

favor of including issues in a watered-down form. As a result, a lot of UNCAC's provisions are phrased in non-mandatory terms, qualified by exceptions, or just inherently vague. Rose argues that "the unusually large number of non-mandatory criminalization provisions contained in UNCAC diminishes its strength as a binding legal instrument" [xlviii]. One legal analysis of the treaty has found that it contains "no fewer than a dozen different levels of implementation obligations (…) from hard (mandatory requirements) to very soft" [xlix].

As a result, the most widely ratified treaty against corruption urges states to criminalize many types of behavior, introduce preventive measures, adopt rules for domestic enforcement and cooperate in cross-border prosecution and asset recovery. But the majority of clauses in the treaty take non-binding forms. Of course international treaties often reflect compromises and opt-outs that indicate a limited ability to reach consensus on deep commitments. However, UNCAC's lack of mandatory standards underscores the particularly high degree of contestation around the various aspects of anti-corruption.

One interpretation could be that governments want to preserve the option to adopt outright corrupt behavior at the highest level. Yet a truly ruthless kleptocrat would probably plunder regardless of treaty commitments. A more likely scenario seems to be that governments want to be able to change policy while still upholding the overall ideal of integrity and accountability. At the time of writing, the new U.S. administration has announced their intention to repeal a part of the 2010 Dodd-Frank act that forces American corporations in the extractive industries to publicize payments to foreign governments. The Republican leadership has argued that the "Publish What You Pay" initiative places an undue burden on U.S. businesses [l]. A similar development occurred in the 1980s, when Republicans in Congress attempted to loosen the rules of the U.S. FCPA, which made it illegal for American corporations to bribe foreign officials at a time when their competitors from Europe and Japan were offered tax deductions for the same expenses [li].

Both instances of norm contestation were about changing how strictly anti-corruption policies were to be applied – without dismissing the concept per se. U.S. lawmakers in the 1980s refrained from relaxing domestic anti-corruption rules, instead opting to level the playing field by pushing for an OECD ban on foreign bribery [lii]. These diplomatic efforts were a big part of the initial impetus to create a global anti-corruption regime, and by the mid-1990s the American norm entrepreneurs had convinced their peers in the OECD to adopt the new concept. However,

the negotiations of the OECD convention again illustrate how anti-corruption touches on sovereignty. During the talks, European and Japanese decision-makers were under the impression that the U.S. government was pursuing business interests under the guise of moral leadership. Regulating corporate behavior was seen as national prerogative and the newly founded NGO Transparency International came under criticism in France for allegedly being an agent of American interests [liii]. By definition, international anti-corruption norms are highly intrusive and thus vulnerable to contestation based on sovereignty concerns.

Contestation over implementation

As we have discussed so far, the international anti-corruption norm is subject to contestation at a fundamental, abstract level. Additional contestation happens on a smaller scale. Here we are talking about the day-to-day management and implementation of anti-corruption. Three examples will illustrate this argument: The measurement of corruption, potential clashes with local norms, and the pitfalls of international peer review.

The appropriate measurement of anti-corruption performance is hotly debated at the time of writing, particularly since African governments feel they have been treated unfairly. To some degree this is a very technical debate. There is a rich literature on the merits and shortcomings of various indicators of perceived corruption and attempts to find more objective measures [liv]. At the heart of this discussion is the problem that clandestine and off-the-records behavior precludes any reliable direct measurement. There are good reasons to doubt the validity of public polling on perceived levels of corruption, which likely fluctuate due to scandals and issue salience [lv]. When it comes to expert assessments, on the other hand, prejudices and biases are hard to overcome even if the survey respondents are actually acquainted with the country they assess, make an intellectual effort, and have access to reliable sources. Academics and policy-makers are trying to achieve more reliable assessments, but certainly still have a long way to go [lvi].

Leaving these important technical challenges aside, there is a more fundamental critique of how anti-corruption has become associated with ratings and rankings. Transparency International's Corruption Perceptions Index (CPI) is heralded as success story in terms of awareness-raising and putting pressure on policymakers. Every year, the NGO publishes a ranking of states according to "how corrupt their public sectors are seen to be".[3] Very reliably,

[3] http://www.transparency.org/research/cpi/overview

the Nordic countries take the top positions, while the bottom half mostly consists of African and Asian states. A different approach is used by the World Bank, which publishes the Control of Corruption indicator to measure "perceptions of the extent to which public power is exercised for private gain".[4] Similar to the CPI, the World Bank's data is widely cited not just in academic research, but also in the media and in policy documents.

In recent years, developing countries have heavily criticized this practice. African states feel doomed to remain at the bottom of the various rankings, which "misrepresent the contextual realities of African countries and completely ignore the escalating international dimension of corruption" [lvii]. Improvements such as new laws or a higher rate of convictions are not registered – unless a country manages to overtake a number of its neighbors due to sweeping reforms, thus improving its rank. But even then, it is likely to regress as others catch up. In a recent report of the UN Economic Commission for Africa, the authors suggest developing new indicators that would be more sensitive to improvements and success stories [lviii]. African governments have certainly recognized the power of naming and shaming in international politics [lix]. As one attempt to provide a counter-narrative, they support an initiative focused on illicit financial flows, which shifts the emphasis to funds flowing from developing countries to financial havens in the OECD world [lx].

This is applicatory contestation: African governments, which chronically receive poor ratings and rankings, argue that the measurement is inappropriate as they fail to reflect genuine efforts to reduce corruption. This might strengthen support for anti-corruption norms – if indicators were changed, governments would subsequently increase their efforts to demonstrate excellent performance. There is, however, a significant risk that contestation about corruption indicators could end up weakening the overall anti-corruption agenda. If governments feel that their efforts are not rewarded, a climate of cynicism and resignation is likely to take hold.

Similar debates take place regarding the implementation of other parts of the anti-corruption agenda. Extraterritoriality is a key point: The U.S. FCPA and similar laws in other countries have led to a situation in which courts apply domestic anti-bribery law although the infraction has happened in another jurisdiction. The U.S. government has the most expansive approach in this regard, arguing that the FCPA applies to entities that are listed on the U.S. stock exchange or hold assets in American banks [lxi]. Consequently, an Australian firm paying bribes in Indonesia

[4] http://info.worldbank.org/governance/wgi/pdf/cc.pdf

might be put on trial in New York City. In a climate of adversarial foreign and economic policies, it is easy to imagine highly politicized cases leading to norm contestation.

Another case in which governments implement rules outside of their own territory is development cooperation, which encompasses countless anti-corruption rules. Governments that receive funding and host such projects have to comply with rules that are not necessarily part of their domestic legal code. Development agencies rely on host countries to enforce laws in line with development programming, showcasing the "huge ambition of international donors to have an impact on national governance" [lxii]. Some authors argue that the international agenda can be at odds with popular perceptions in target countries. Using Liberia as an example, Funaki and Glenclose show that the notion of abusing public office for private gain does not always capture citizens' actual concerns. In their example, the social norm of generosity was more important than integrity: "it was not necessarily the taking of bribes that was seen as problematic by the local community, as much as it was the failure to [subsequently] share the wealth [with local residents]" [lxiii]. So beyond the fundamental tension between international anti-corruption norms and state sovereignty, there is an added layer of potential contestation linked to extraterritorial enforcement of rules.[5]

The final issue we want to address here is international peer review. Peer review is meant to reinforce the anti-corruption norm through socialization, as countries that have ratified a treaty regularly engage in a mutual assessment of performance. The Council of Europe and the OECD are praised for pioneering the use of this instrument in the field of anti-corruption. In the literature on international institutions and the design of treaties, it has been argued that the existence of a monitoring mechanism is the minimum "threshold for identifying hard law" [lxiv]. By extension, the creation of such a mechanism at the global level might be good news for the robustness of the norm.

Just a few years ago, Chaikin and Sharman (2009, p.42) argued that it might be "unrealistic" to transfer the OECD model of peer review to the United Nations because the latter's membership is much larger and much more diverse. It turns out that their prediction was off: In 2009, at the third conference of parties to the UNCAC, the Implementation Review Group (IRG) was created and a mechanism of periodic peer review established [lxv]. The IRG's procedures,

[5] Staying with the analogy to human rights, the controversy about the International Criminal Court seems to follow a similar logic.

however, are less ambitious and the publication of results is limited compared to the OECD [lxvi]. This results in less transparency of the process and results. A further shortcoming is that implementation has been quite slow, probably caused by lacking enthusiasm as well as logistical challenges: "Eight years after UNCAC's entry into force, only a fifth of the States Parties have undergone a mutual evaluation for the first phase of review, whereas ten years after the OECD Convention's entry into force, the Working Group had completed three phases of mutual evaluations, and was undertaking a review process" [lxvii].

So it seems that the UNCAC's review process has considerably less bite than the ones in other organizations. Its creation is not a strong indicator of norm robustness, particularly considering how many of the substantive UNCAC provisions leave a lot of room for interpretation and opt-outs (see section 3.1). To the contrary, there is a risk that UNCAC's peer review will open up new areas of contestation. Because UN membership encompasses very different regimes from all regions of the world, one can expect frequent and substantial differences of opinion about countries' anti-corruption performance. When a review finds local practices at odds with UNCAC provisions, the respective state might voice strong disagreement – and find many like-minded peers. UNCAC's provisions certainly leave room for such issues of interpretation. Moreover, peer review might draw attention to instances in which member states consciously choose to opt out, as UNCAC allows. Proponents of peer review could argue that in such cases, the reluctant parties will be socialized – or pressured – into making deeper commitments. However, the effect might be in the opposite direction. If states do not change their behavior despite criticisms voiced through peer review, they essentially contest the application or even validity of the respective part of the anti-corruption norm. It is not obvious that the introduction of a peer review mechanism at the UN level will automatically increase norm robustness given the possibility of successful contestation.

Contestation Over Anti-Corruption Discourse, Framing, and Strategic Approach

Our discussion of contestation over sovereignty, policy autonomy, and implementation has treated the anti-corruption norm as relatively fixed. Emerging sources of contestation over the meaning, content, and scope of the norm complicate this analysis. This kind of contestation is especially prevalent within and across transnational actors and networks within the broad field of

global anti-corruption research and advocacy, that is the 'anti-corruption movement' [lxviii]. An important site where emerging sources of contestation become apparent in the global anti-corruption scene is the International Anti-Corruption Conference (IAAC), held every two years in a different region of the world. [lxix].

The 17th annual IACC was held in December 2016 in Panama. The theme for the conference was "Time for Justice: Equity, Security, Trust", including attention to growing security risks faced by anti-corruption activists, journalist, and other vulnerable groups in many parts of the world. Here, several themes of emerging contestation arose. For one thing, new avenues for anti-corruption advocacy are challenging the limited scope of the anti-corruption norm in global politics. Calls at the conference to "break open the silos" that separate conventional anti-corruption discourse from that of human rights and social justice activism indicate this kind of challenge. These calls included various appeals from conference participants to expand the purview of anti-corruption activism, in several directions: to include attention to tax havens as a key focus of anti-corruption initiatives; to increase attention to the ways in which corruption in the private sector contributes to economic crimes and human rights violations and to call for increased mechanism of corporate accountability; to incorporate a "social damage approach" as a way to uncover and address complex interconnections between tax evasion, capital theft, corruption, and human rights violations; to expand anti-corruption discourse to include attention to gender inequality, sexual exploitation, sexual harassment, and "sextortion" in so-called body-currency corruption that enables human trafficking and slavery; and – among class to examine corrupt institutions rather than corrupt individuals – calls to recognize systematized corruption and kleptocratic tendencies in various politics, including the United States.

While it remains to be seen the extent to which such calls to expand the scope of the anti-corruption will be taken up, new initiatives are arising. For example, one relatively new international NGO devoted to fighting grand corruption in global politics is Integrity Initiatives International, which advocates the establishment of a permanent International Anti-Corruption Court along the lines of the International Criminal Court, to prosecute corrupt government leaders. In a departure from Transparency International's non-confrontational coalition-building approach to anti-corruption [lxx], the motive of this new organization is to deter and punish high profile individuals as a way to combat impunity for grand corruption. This group's approach also represents a departure from transactional business bribery focus of the institutionalized norm

of anti-corruption; the new anti-corruption activism links corruption with fundamental global issues including international peace and security, migration crises, and democracy, justice, and ethics. Integrity Initiatives International explicitly compares the consequences of grand corruption to those of genocide and other "intolerable human rights abuses." [lxxi]

5. Conclusion

The cluster of anti-corruption norms adopted by the United Nations is the product of long negotiations about many sub-elements proposed by a wide array of actors. Not surprisingly, anti-corruption has changed and evolved since its emergence on the global agenda. While the norm's content, applicability, and validity may be challenged through various kinds of contestation, actors recognize its existence and this recognition shapes behavior. It will remain for further analysis to explore the extent to which ongoing contestation will challenge or enhance the robustness of this relatively new norm.

In our analysis, we have identified a number of focal points that seem particularly relevant. When it comes to norm robustness, anti-corruption has been firmly established in terms of treaty ratifications, institutionalization and public opinion. Future research should thus focus on third-party reactions to norm violations and on compliance, which remains the most difficult indicator to assess. Sanctions aimed at the private sector – mainly when it comes to anti-bribery enforcement – and against states that fail to comply with conditionality provide a glimpse at this dimension of norm robustness. Given the lack of reliable, direct measurements of corruption, this might be the closest approximation available to empirical researchers.

Our understanding of anti-corruption as a global norm can be greatly enhanced by investigating processes of contestation. We hope to have provided some useful suggestions for further research by sketching patterns of contestation that fall into three broad categories. First, anti-corruption entails a fundamental tension with sovereignty norms, according to which the conduct of domestic politics should not be scrutinized by outside actors. Second, the day-to-day implementation of anti-corruption invites contestation. Particular hotspots so far concern the measurement and controversial ranking of anti-corruption performance; clashes between international standards and local norms; and mutual assessment via peer review, which has recently been added to the UN process. Applicatory contestation in these respects has the

potential to reinvigorate fruitful debates about anti-corruption – but in a more pessimistic scenario, actors could grow disillusioned or cynical and withdraw their support.

The third dimension of contestation concerns debates about the boundaries of the anti-corruption norm as well as the strategies that ought to be used in its support. Ongoing processes of contestation about the further development of anti-corruption could very well lead to change in areas such as private-sector bribery or lobbying and campaign finances. Related to the issue of norm evolution, the advocacy strategies used by norm proponents deserve further attention. As illustrated by the recent conference in Panama, political activists continue their attempts to broaden the scope of the anti-corruption agenda. This discursive strategy in itself suggests that the norm is perceived as relatively robust but also malleable, turning it into an attractive umbrella for adjacent issues.

What remains are questions concerning the prospects for anti-corruption governance. Is corruption something that can be meaningfully managed at the global level? There are certain barriers inherent to the project. The reach of global governance depends on implementation at the national level, which is highly problematic as global markets tend to be out of reach of government regulation. The global norm of anti-corruption, premised on a specific rational-bureaucratic ideal may not fit well with local contexts. Even in national contexts where the ideal may match, as in Brazil, the short time horizons of democratic governments do not encourage concerted focus on the fight against corruption – which requires a longer term view. In general terms, global norms tend to be highly variable in both their meaning and implementation across local contexts. Advocates of global anti-corruption policies need to be careful that these do not merely mask a more contentious exercise of global power by imposing a problematic global standard. At the same time, a global norm of anti-corruption that fully recognizes the networked and transnational aspects of corruption may serve to increase legitimacy and effectiveness in local anti-corruption efforts.

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