Impact Assessment and Project Appraisal

ISSN: 1461-5517 (Print) 1471-5465 (Online) Journal homepage: http://www.tandfonline.com/loi/tiap20

Development aid: Regulatory Impact Assessment and conditionality

Viktor Jakupec & Max Kelly

IMPACT ASSESSMENT AND PROJECT APPRAISAL, 2016
VOL. 34, NO. 4, 319–329
http://dx.doi.org/10.1080/14615517.2016.1228339

Development aid: Regulatory Impact Assessment and conditionality

Viktor Jakupec and Max Kelly

Faculty of Arts and Education, Deakin University, Warrnambool, Australia

ABSTRACT
The purpose of this paper is to examine how Regulatory Impact Assessment (RIA) can contribute to decision-making processes of Official Development Assistance (ODA) loans and grants. The point of departure for the discussion is the phenomenon that RIA, within a context of ODA, is applied by International Finance Institutions mainly in the context of Development Policy Loans, to introduce or strengthen country systems for Regulatory Impact Assessment. However, ODA grants, and loans, particularly when specific policy or regulatory conditions are attached to them, significantly impact economic and social conditions within the beneficiary country. This article examines what role RIA can play in facilitating a coherent decision-making process affecting the ODA allocation within a context of conditionalities requiring the introduction of new, or changes to existing, policies and regulations. The discussion considers the nexus between development aid effectiveness, conditionality and ownership, and RIA. The article argues a justification for applying RIA to ODA loans and grants which carry regulatory and policy conditionalities.

ARTICLE HISTORY
Received 8 March 2016
Accepted 4 July 2016

KEYWORDS
Regulatory Impact Assessment; development aid conditionality; Official Development Assistance; Washington Consensus

Introduction

Regulatory Impact Assessment or Regulatory Impact Analysis (RIA) is a crucial instrument for improving the efficiency, effectiveness, transparency and accountability of regulatory decision-making. RIA is applied widely throughout OECD countries, and less frequently in developing countries (cf. Kirkpatrick et al. 2004; Adelle et al. 2015). The role of development aid or Official Development Assistance (ODA) in promoting sustainable development in an increasingly globalised world economy focuses, among other activities, on broad-based economic growth, supporting business development and the expansion of the private sector through an enabling environment. The realisation of these development-focused goals requires significant change to economic, social and environmental policies, and regulatory reform in legislation, guidelines and decrees governing business activity, but also policies and regulations affecting the broader social and societal impacts of development aid across the social and economic fabric of society (Kirkpatrick 2014). The assessment of potential impacts, of course, requires tools and systems that promote regulatory efficiency and effectiveness, in other words, a supportive enabling environment to achieve development outcomes.

The starting point of this paper is that development aid is frequently subject to certain conditions, to encourage recipient activities that align with donor intent, or interest. Despite considerable interest in conditionalities (cf. Kilby 2009; Bresslein & Schmaljohann 2013; Hernandez 2015) and some work on the link between conditionalities and country ownership of aid, there is little, if any significant evidence indicating an interrelation between ODA conditionalities and RIA. This link poses a complex area of discourse, requiring an analysis of the interrelationships between the imposition of conditionalities, ODA, RIA, and understandings of development aid effectiveness with specific reference to country 'ownership' of aid agendas. To be more precise, donors and recipients acknowledge that aid effectiveness is essentially contingent on the political will and capacity of the recipient country's political decision-makers, and powerful interest groups' acceptance of the need for, and commitment to, development as perceived by the donor (OECD 2005, 2008). Despite the rhetoric surrounding ownership, International Finance Institutions (IFIs) and other donors continue to impose political and economic conditions on ODA recipients, with limited or no assessment of the impact of these conditions on the sustainable development of recipient countries.

Thus, the following question remains unanswered: how can IFIs support the realisation of developing countries' ownership of ODA-based activities in the light of imposed policy and regulatory conditionalities? This paper considers the potential for RIA to contribute to more effective aid, through an analysis of the

CONTACT Max Kelly max.kelly@deakin.edu.au

inter-linkages between aid conditionality, policy and regulatory reform, and country ownership. This paper draws on and links contemporary debate on ODA, conditionalities, aid effectiveness and RIA, to provide a case that RIA needs to be undertaken on ODA allocations that include conditionalities requiring regulatory changes of beneficiary countries (Kirkpatrick & Parker 2004).

Methodology

The paper draws on contemporary discourse within the fields of International Development and Impact Assessment to make the case for the application of RIA to ODA loans and grants which carry regulatory and policy conditionalities. This is necessitated by a complete lack of application of RIA in this context as identified through a review of the practices of IFIs practices in RIA, as demonstrated through available institutional literature. The paper draws on scholarship and studies that focus specifically on aid, development and conditionalities, firstly providing an overview of RIA, and its relevance in the context of foreign aid. A review of key debates in aid effectiveness and tensions inherent in applying conditions to ODA follows. This sets the scene for analysis of the shortcomings of existing forms of assessing the impact of foreign-aid-driven policy and regulatory changes, and the justification of the application of RIA in an ODA context.

Impact assessment, RIA and foreign aid

Impact assessment in international development theory and practice is firmly entrenched, in theory, and increasingly in practice. Mounting pressure to demonstrate the impact of ODA, positive and negative, intended and unintended, is driven by issues of transparency and accountability in spending of public funds, and competing claims about the effectiveness or efficiency of aid and development programming. There is huge diversity in impact assessment within foreign aid, from the well-established Social Impact Assessment, Policy Impact Assessment, environmental impact assessment, through Impact Evaluation, Poverty and Social Impact Analysis, Health Impact Assessment, and many more. We focus specifically in this paper on RIA, as a relative newcomer to the field, and an area of rather limited discourse in relation to poverty alleviation and development.

Regulation may be defined as 'Any rule endorsed by government where there is an expectation of compliance' (Australian Government 2014). Regulation is not the only policy option. The focus on RIA is quite deliberate given the centrality of economic theory and ideology underpinning ODA, and the associated focus on governance and regulatory reform that have been central to foreign aid allocations over the past half-century. We focus at the regulatory level, given the fundamental changes in regulatory reform agenda over the past few decades. Focus on deregulation through the 1980s and 1990s, moved to ideas on reregulation and regulatory quality management. The contemporary focus is 'better regulation' (European Commission 2015) in response to failures associated with deregulation. Regulatory quality' captures perceptions of the ability of the government to formulate and implement sound policies and regulations that permit and promote private sector development' (World Bank 2015). However, regulatory quality is undeniably a somewhat problematic and complex concept as various stakeholders will perceive quality differently (Radaelli 2003). Of course, as noted above, given the breadth of engagement with impact assessment in development, assessing the impact in the regulatory space can encompass a much wider remit than just RIA. The link between policy and regulation is such that most levels of policy assessment must engage with regulation. Integrated Impact Assessment in the European Union introduced in 2003 provides a platform for evidence-based policy-making, and includes assessing impact of policy and regulatory reform from economic, social and environmental perspectives (cf. Torriti & Löfstedt 2012). Other emerging initiatives that engage with the impact of regulatory change include Strategic Environmental Assessment (cf. Tetlow & Hanusch 2012), Sustainability Appraisal or Territorial Impact Assessment (cf. Fischer et al. 2015). This also provides clear evidence of a shift in impact assessment to multilevel engagement and the increased need for assessment of complex multidimensional impacts, across a range of scales (cf., Nieminen & Hyytinen 2015). Acknowledging that each of these brings new and innovative thinking and approaches to understanding potential impacts of policy and regulatory reform, we retain a focus on RIA, given the regulatory nature of much aid conditionality.

Regulatory Impact Assessment is defined by (OECD 2016, para. 1) as

> … a systemic approach to critically assessing the positive and negative effects of proposed and existing regulations and non-regulatory alternatives. As employed in OECD countries it encompasses a range of methods. It is an important element of an evidence-based approach to policy making.

In essence, conceptually RIA is a consistent analytical method or systemised process or tool to assess the potential or actual impact of policy (Adelle et al. 2015). RIA contributes to better regulatory decision-making either in design (ex ante) or evaluation of existing policy and regulatory effects (ex post) on a country's social, economic and political conditions. Kirkpatrick and Parker (2004) notes that RIA should encompass the objectives of a proposed regulation, potential risks, options for delivery, costs and benefits to different stakeholders (including government and nongovernmental bodies, as well as presumably the private sector), as well as the likely economic, social, environmental and distributional consequences. RIA is firmly embedded in nearly all OECD countries, having grown in both geographical coverage and scope since its emergence in the late 1970s and early 1980s.

The increased interest in and implementation of RIA in the OCED foreshadowed the increased support of RIA in developing countries. The UK Department for International Development (DFID) was an early supporter, and the OECD and World Bank are strong advocates of beneficiary country adoption of RIA (Adelle et al. 2015). The current positioning of RIA in foreign aid is primarily related to the growing programme support for the purpose of, for example, institutionalising RIA at legislature and national government level within beneficiary government instrumentalities such as ministries and regulatory authorities (Staronova 2010; Adelle et al. 2015). Often the introduction of RIA within an ODA context will (i) support the government in developing human resources required for implementing RIA in government departments; (ii) aid the government with the implementation of 'best practice' RIA; and (iii) foster a demand for quality regulation through cooperation with business interests and the public, often focusing on promoting an expanded and diversified private sector. Although it is clear that the promotion of RIA processes within developing countries can be a strong promoter of better decision-making – and there are clear examples of country ownership via impact assessment programmes,[1] the focus of this paper is the assessment of ODA conditionality-based impacts.

A review of project documents across the Asian Development Bank (ADB), and World Bank and other IFIs, like many other donors and development agencies, focuses on the internal processes of individual countries in adopting RIA, and not on RIA as it may be used within a framework of ODA loan or grants. There is little evidence that donors, including IFIs, have subjected ODA-related project-based regulatory conditionality, which is imposed on recipient governments, to processes of RIA. In other words, conditionality requiring political, economic and social policy or regulatory changes within the ODA arena is often imposed without an ex-ante RIA. Thus, there is no apparent link between RIA and grant/loan conditionality. There are several processes potentially in this space. The first is utilisation of RIA to consider conditionalities as an option in ODA, the second is a process of RIA of regulatory conditionalities, and options within this sphere are contrasted. This brings to the fore a number of broad questions.

Firstly, if RIA is being used for the purpose of strengthening a recipient government in terms of effectiveness, efficiency, transparency and accountability of its policies and regulations, especially in relation to the above-suggested purposes, why should the same not apply to every ODA loan or grant? In other words, is there a valid argument to impose RIA on reviewing every loan or grant conditionality which requires changes to existing or the formulation of new policies and regulations?

Secondly, there is a question of efficiency and effectiveness of RIA for ODA loans and grants to be considered. As far as efficiency is concerned it could be argued that the outlay for RIA must be kept within a reasonable proportion of the loan or the grant itself. Concerning effectiveness, the implication may well be how far, if at all, the conditionality and subsequent changes to existing and introduction of new legislation or regulations in response to ODA will or may affect the society or specific sections of society? This includes effects on individuals, socio-economic strata groups, minorities and disadvantaged, the aged, public and private enterprise, employment in the labour market, education and training and the environment, to name but a few.

Irrespective of whether we look at RIA from the efficiency or the effectiveness standpoint, it could be said that the underlying rationale for undertaking ex-ante and ex-post RIA is that revised and new policies and regulations emerging from ODA loan or grant need to be assessed on a case-by-case basis. The aim should be to ascertain to which extent such policies or regulations may contribute to the recipient country's strategic social, political and economic goals. To be sure, and as we noted previously, changes to existing and introduction of new policies and regulations may produce 'positive' (e.g. economic growth and social welfare) as well as 'negative' outcomes, e.g. leading to substantial undesirable social and economic effects and costs (cf. Stiglitz 2000).

Adelle et al. (2015) note that RIA has the potential to at least minimise damage from bad policy, but that it can 'also empower developing countries to assess and develop their own policies, rather than accept 'precooked' policies from elsewhere' (p. 233). If there was a functioning RIA system in place in a beneficiary country then as the recipient of ODA funding and impacts, ideally RIA would be conducted by the recipient. This assumes that a recipient country has a level of choice in terms of ODA funding sources and approaches. The form and function of RIA is thus driven by the complexities of a foreign aid context, where issues of impact, accountability and transparency of aid spending is complicated by a number of dilemmas and tensions inherent in ODA. The following section unpacks the complex relationship between donors, IFIs and aid recipient countries to frame the debate.

Aid effectiveness, conditionality and ownership in development aid

Foreign aid or more specifically Official Development Assistance is delineated as the most conventional determinant of aid movements to developing countries. The OECD (2015, n.p.) defines ODA as:

> … flows to developing countries and multilateral institutions provided by official agencies, including state

> and local governments, or by their executive agencies, each transaction of which meets the following test: (a) it is administered with the promotion of the economic development and welfare of developing countries as its main objective, and (b) it is concessional in character and contains a grant element of at least 25%. (calculated at a rate of discount of 10%)

Internationally agreed action towards making aid more effective has evolved from the late 1990s in recognition of significant barriers to aid architecture and implementation (OECD 2012). Fundamental principles for effective aid were, therefore, first agreed in an international meeting convened by the OECD in Paris in 2005, being country ownership, alignment, harmonisation, results and mutual accountability (OECD 2005, 2008). There were significant changes, in theory at least, from basic principles of coordination in the 2005 Declaration on Aid Effectiveness (OECD 2005, 2008), to a much higher level focus on cooperation and partnership in the Accra Agenda for Action (OECD 2008; Hayman 2009). Subsequently, the Busan High Level Forum (OECD 2012). proposed the following four core principles for achieving common development goals, namely, ownership of development priorities by developing countries, a focus on results, inclusive development partnerships, and transparency and accountability (OECD 2014). The aid effectiveness agenda permeates, and should underpin, development theory and practice (Booth 2008; OECD 2012).

The core principle of ownership is highlighted in this paper, given the central focus on partner country ownership of development, although this does interact with each of the other priorities obviously. However, as many authors note (cf. Hayman 2009; Sjöstedt 2013), the implementation of partner country ownership, harmonisation with other donors, and more precise alignment with partner country priorities is highly problematic with tensions inherent in results-based management requiring stricter prioritisations of donors. A critical aspect of ownership identified by Hayman (2009, p. 583) is 'a country taking responsibility for the development, management and implementation of policies for poverty reduction'. There have been mixed outcomes in implementing the effectiveness agenda shown by the Global Partnership for Development (OECD 2014) review of progress, with some gains in inclusiveness and transparency. However, country ownership is relegated to investments in strengthening country systems, with it noted as being 'too early to say whether enhanced commitment to ownership is translating into increased use of developing countries' own results frameworks to guide development co-operation on the whole' (OECD 2014, p. 16). Even if a results framework were widely enough defined to encompass impact, rather than outcomes, the disconnect between a commitment to ownership, and a lack of country-owned results frameworks leaves little room for complacency about the impact of regulatory reform, and conditionalities.

The *realpolitik* of ODA ownership is subject to an interplay of various interests and a variety of factors, but in essence, these should be perceived as recipient country-specific, including recipient government commitment to development aims and objectives, aid dependency and regulatory and policy manoeuvring space, to name but a few. This includes not only the domestic stakeholders but also donors. However, years after the Paris Declaration there is little evidence a level playing field between donors and recipients has been established (cf. Wathne & Hedger 2009). Bilateral aid is subject to donor's political and economic interests. However, multilateral institutions are less encumbered with these direct pressures, and may well be in a better position to address conditionality more critically. We will address the nexus between conditions attached to aid, and control subsequently in our discussion.

Focusing on aid conditionality it is important to note that conditions attached to aid have been usual practice in ODA for decades. Cabello identifies conditionality as a

> … set of mechanisms in the development policy lending that the IFIs use to impose policies, such as market-opening, deregulation or privatization, on poor countries. (Cabello et al. 2008, p. 7)

The 1980s debt crisis paved the way for far greater intervention from the IFIs in recipient country decision-making. Early conditionalities were primarily economic, for example, budget deficits, privatisation and trade liberalisation and driven by the World Bank and IMF (OECD 2009). In this context, the OECD (2009) notes that mission creep in the 1990s led to situations such as that of Korea, where 'the IMF was actually ordering the Korean government to give independence to the country's central bank and even told private Korean companies how much debt they could take on' (p. 29).

A key turning point in regard to conditionalities emerged from the 'new aid agenda' (OECD 2009; p. 31) and strongly influenced by an oft-cited and widely critiqued World Bank analysis (cf. Collier & Dollar 1999), which identified a supportive policy environment and sound institutions as essential for more effective aid, through economic growth and poverty reduction. Killick (2004) noted the 'knowledge-practice' gap in conditionality, with a disconnect particularly in the 2000s between World Bank's acknowledgement of the limited impact of conditionality, and a continuing heavy reliance on it. Despite decades of critique, conditionalities are still firmly embedded in development aid. Furthermore, conditionality has been under the spotlight, in particular since the widely debated failures of the IMF and World Bank structural adjustment lending (Hermes & Lensink 2001) in the 1980s and 1990s. There are of course varied notions regarding conditionality. For example, Kovach and Fourmy (2006) argued that aid should be conditional on being spent transparently, and on reducing poverty, nothing more. The OECD

(2009, p. 31) notes the centrality of broadened and expanded conditionality in the new aid agenda, with governance and institutional issues framing economic and political benchmarks. Despite 'ownership' rhetoric in the new aid agenda, the OECD (2009) notes the much broader scope of conditionality and potentially, therefore, a much wider impact, due to the breadth of policy conditionality, such as privatisation or liberalisation of an entire sector rather than just a programme or project, may be achieved.

There is widespread debate in the literature around changes to ODA conditionality generated by IFIs, which shows the outcomes to be at best inconclusive and at worst instrumentally, and, sociopolitically and socio-economically flowed. Foreign aid sceptics claim that conditionality attached to ODA loan is generally intrusive and encroaches on national sovereignty, and thus destabilises recipient countries' domestic democratic process and from this vantage point ODA is ineffective in terms of achieving the anticipated outcomes (cf. Stiglitz 2002; Drazen 2002; Easterly 2006; and for a contrary view see Sachs 2005).

This inconclusiveness is not surprising for the conditions under which aid is both given and received are many. There is significant diversity between not only major IFIs, such as between the IMF and the World Bank (cf. Bull et al. 2006) but also between IFIs and bilateral aid agencies and NGOs. For example, the IMF identifies the need for conditionality within its lending to ensure that economic policies are adjusted by the lending government to 'overcome the problems that led it to seek financial aid…' (IMF 2016, para. 1). In contrast, the World Bank (2005) in its 'Review of World Bank Conditionality' document defines conditionality as

> … the set of conditions that, in line with the Bank's Operational Policy (OP) 8.60, para. 13, must be satisfied for the Bank to make disbursements in a development policy operation. These conditions are (a) maintenance of an adequate macroeconomic policy framework, (b) implementation of the overall program in a manner satisfactory to the Bank, and (c) implementation of the policy and institutional actions that are deemed critical for the implementation and expected results of the supported program. Only these conditions are included in the Bank's loan agreements. (p. 4)

However, in contrast with the WB, other IFIs such as the IMF use a narrow instrumental definition for conditionality, namely the specific conditions attributed to the disbursement of policy-based lending or budget support (Koeberle et al. 2005; IMF 2016). The difference between the WB and IMF is that that the former perceives conditionality as delineated in the loan agreement, whereas the latter also includes programmes and benchmarks, which are not legally binding (Bull et al. 2006).

The notions of conditionality as adhered to by the World Bank and the IMF respectively, bring to the fore again the question of ownership. As we can see from the above, the concept of 'ownership' within a context of ODA and conditionalities is difficult to delineate, for different stakeholders perceive it from differing vantage points. For IFIs, as donors, ownership may mean the acceptance by recipient governments of certain conditionalities which are attached to loans or grants as their own, and bring about appropriate regulatory changes within or through their regulatory system (Drazen 2002). For ODA recipient countries, ownership underscores their exclusive and sovereign regulatory leadership and political power to capture their country's political, economic, social and cultural interests and response to ODA conditionality. So as Drazen (2002) notes, conditionality is both incompatible with either complete ownership, or no ownership.

The link between country ownership and aid dependency also does raise significant questions about the power relationships inherent in the donor/beneficiary relationship, with an unequivocal trade-off between aid and ownership (Furtado & Smith 2009). In an analysis of 'ownership' of aid in Mozambique, which is widely considered a development success, there was an apparent discrepancy between donor and government power (de Renzio & Hanlon 2007). Killick et al. (2005) note that 'boldness by (recipient) government' (p. 50) can reduce these asymmetries somewhat, but this is a small step towards country ownership in the frequent case of aid-dependent nations. The donor–recipient power juxtaposition may in different modes confront recipient government ownership of the conditionalities imposed by donor agencies, with potentially adverse impacts on outcomes of development projects or programmes. (cf. Eyben 2010).

Politics, economics and conditionality: from Washington Consensus to Post-Washington Consensus

No discussion of conditionality of ODA loans or grants would be complete without a closer exploration of a wide scale transition to market-led economic development, and the role of the state which underpins conditionalities. Development policy has changed radically from a state-led approach in the 1950s and 1960s. The 1970s saw the emergence of a focus on human needs within a broader social agenda, and the evolution of the open market in the 1980s and 1990s. A focus on institutions grew out of the failures of the free market, and the current debates hinge around an increasing role of the state, but within parameters of market-led development. Conditionalities have changed and evolved in line with donors' or IFIs' interests (Radelet 2006). Within development literature the ongoing controversies about aid effectiveness, the so-called Washington Consensus and Post-Washington Consensus are bandied around as a core component of the 'new aid agenda' referred to previously, and are touted as either the roadmap to a prosperous future, or as the source of all evil (cf. Stiglitz 2008). However briefly, the Washington Consensus is used to denote broadly a free market economic philosophy and politics, including free trade, floating exchange rates, free markets and macroeconomic stability, deregulation, financialisation, and privatisation, which is still supported in one form or another by IFIs such as the World Bank, IMF, the European Bank for Reconstruction and Development, the ADB and others. In essence, it is neoliberal ideology[2] based on the writings of economists from the Austrian School such as Hayek (1979), and the Chicago School such as Friedman (1980). The conditionalities imposed under this model are of course directly related to the underpinning philosophy of free market and minimal state.

Significant critique of this neoliberal agenda within the ODA arena, especially as a cornerstone for conditionality, and implemented in developing countries by various IFIs in diverse forms, highlighted undesired, ineffective and inefficient results for the developing countries generally and specifically for the poor and the socio-economically disadvantaged in many ODA recipient countries (Easterly 2001; Stiglitz 2002; Rodrik 2006).

In response to the emerging critiques and challenges the World Bank and other IFIs as the dominant proponents of the Washington Consensus and its neoliberal ideology, moved towards an increasingly complex and sociopolitically reformist Post-Washington Consensus[3] (Rodrik 2006). This Post-Washington Consensus has refocused the debate on a more statist approach, thus bringing to the fore sociopolitically justifiable development strategies of the Left. Social democracy and justice, socio-economic and sociopolitical equity and participation, the developmental state, market-oriented social economy, ordoliberalism, and other hallmarks of a socially responsible state have gained credence in ODA conditionality – at least at the academic level of the development aid discourse (Engel 2006; Krogstad 2007; Stiglitz 2008; Lesay 2012).

Conditionalities imposed on aid have been an area of significant controversy; however; they remain in place primarily because donor funding comes with a philosophical requirement to justify the spending of public money on foreign aid programmes, and therefore must change conditions that have prevented economic growth and development. In broad terms Radelet (2006) identifies the changing nature of conditionalities in relation to the above evolution of political and economic thinking. The 1980s saw conditionalities on macroeconomic issues, trade reform and privatisation, governance, corruption and institution building emerged as core areas for conditionalities in the 1990s and in the current Washington Consensus/Post-Washington Consensus era there is debate around the role of conditions regarding democratic reform (Radelet 2006). Unfortunately as Radelet (2006) points out there are three key problems with conditionalities, firstly it is not clear what policy prescriptions will promote sustainable development. Secondly, critiques of the imposition of too much conditionality in ODA, are mirrored by critiques of too little, and finally, conditionality does not seem to work, as governments don't tend to implement reforms unless they are in the interests of the country, and the World Bank in particular is frequently noted as rarely withdrawing aid in the absence of conditionalities not being met.

Jacobs (2004) highlighted institutional challenges to support market-led growth, including promotion of good governance and reduction of regulatory risk. Regulatory reform is essential to achieving the ongoing shifts in state and market institutions. However, reform to the policy, institutional, procedural and instrumental legal instruments that provide the context for market-led economic growth and development require oversight, and a clear assessment of the impact, positive and negative, intended and unintended, and this needs to be broader than just an analysis of the impact on economic growth, as sustainable development has a much wider remit, for social, environmental, cultural as well as economic outcomes and impacts. When the regulatory reform is driven by conditions imposed by external forces, such as IFIs, there is an even greater need to assess impact on a case by case basis.

Linking foreign aid, conditionality, ownership and RIA

The starting point of the 'linking ODA, ownership and RIA' discussion is to locate ODA conditionality within a context of RIA. And here we may find a problem of development assistance, namely the efficacy of the imposition of regulatory requirements through loan agreements are, as we noted previously, hotly contested. However, in the absence of the formulation and implementation of regulatory conditionality, sustainable development may be unlikely to be achieved. Thus, the question is not for or against regulatory conditionality per se, but the type of and processes of formulating regulatory conditionality. To clarify, conditionalities, which are seen politically as advantageous from a donor's point of view, may not be considered in the same light by the recipient country and its population's vantage point. This is especially the case when conditionality may not be an effective policy or regulatory tool for achieving sustainable development. Loan conditionality can only be effective if there is the recipient government's political will and commitment to social, economic and political reforms (Drazen 2002).

There are of course compelling arguments for IFIs to attach specific conditionalities to ODA grants and loans. The imposition of conditionality is partly due to the principal–agent problem in international development (the indirect and distant link between the (potentially long chain of) principal (donor) and agent (beneficiary).[4] However, there is evidence to show that the current regime of conditionality is to a large extent counterproductive and ineffectual. If this stands to reason, then those IFIs, which insist on policy conditionalities, may find themselves sidelined by developing countries turning to other funding sources. Examples are the China-led Asian Infrastructure Investment Bank (Jakupec & Kelly 2015) and the New Development Bank (formerly known as BRICS Bank) (Schablitzki 2014; Biwas 2015) which have fewer policy conditionalities attached to their respective development aid. The former is in direct regional competition with the ADB and potentially the World Bank in the region, and the latter will undoubtedly compete globally with the World Bank.

This brings to the fore the question if lessening of conditionality on ODA loans would entail recipient countries avoiding scrutiny of policies leading to economic and political advancement within a social and cultural context? The general answer may be in the affirmative. However, an ex-ante RIA would potentially show such weaknesses. Thus, in essence, there is not a sustainable argument against conditionality itself, but there is an argument to make conditionality less doctrinarian and more country-specific, and to use ex-ante RIA more rigorously for ODA decision-making. That is, regulatory reforms on the basis of conditionality need to be understood as leading to changes that enhance the quality of regulations in a context of providing authentic opportunities to promote economic activities and social welfare. But this is exactly what any IFI would claim in a relation of imposed loan/grant conditionality. This may be true, but only from a neoliberal economic and political ideology agenda – an ideology which may or may not suit the political, social, economic and cultural conditions of the recipient country.

Despite the changes in conditionality from a Washington Consensus orthodox neoliberalism to a Post-Washington Consensus social neoliberalism or ordoliberalism framework, conditionalities at policy level have to a large extent failed (Morrissey 2004; Emmanuel 2010). Thus, it is not surprising that ownership concepts have been introduced as part of a broader aid effectiveness agenda (OECD 2005, 2008). The introduction of these two new concepts is important, for they provide ODA donors and recipient countries with a mechanism to effectively reduce poverty. To elucidate, ownership, if appropriately applied, so the argument goes, provides opportunities for recipient governments to select their own development policies and legitimately claim ownership.

However, the problem with current neoliberal IFIs policy conditionality is that it counteracts not only the notion of ownership but also the basis of ODA effectiveness and efficiencies (cf. Schablitzki 2014; Biwas 2015). Furthermore, a significant number of ODA researchers and practitioners are in agreement that conditionalities, which have the aim of cajoling (or forcing) recipient governments into specific policy and economic reforms, were less than successful (Fine et al. 2001; Kuczynski et al. 2003; Morrissey 2004). There are a number of well-defined reasons for the lack of success. Conditionalities undermine the concept of ownership and thus local accountability structures, especially when donors suppose that conditions can enable recipient governments to push through urgently needed economic and political reforms, without a broader support from its populaces. Thus, there is a danger that recipient governments become responsible to the donors, rather than to its citizens.

Thus, redefining ownership would cast conditionality in a new key. That is, IFIs may need to redefine the ownership concept by appropriately addressing their thinking, and establish a level playing field between donors and recipients. Alternatively, the whole project called aid effectiveness will remain less effective than may be required. Therefore, in order to present conditionality in a new key, there is a need to subject conditionalities themselves to RIA, unpacking pivotal notions in terms of ownership at theoretical as well as practical levels.

In our analyses focusing on RIA rationale and justification, we encountered, as indicated previously, a number of problems: (i) there is an absence of RIA theoretical discourse in academic as well professional literature; (ii) the regulatory theories underpinning ODA are at best opaque or at worst curiously absent from the IFI's justifications for conditionalities; (iii) the relationship between donors and recipients has not been readily defined in the ODA literature, i.e. the principal (donor)–agent (recipient) relationship has not been sufficiently addressed (cf. Killick 1997; Murshed 2009).

Through the preceding discussion, a number of factors have been established. Firstly, although IFIs encourage and support ODA recipient governments to implement RIA under the 'good governance' agenda, there is little evidence presented in the IFI's reports and relevant literature that the same principles apply to assessing the imposition of conditionalities which require policy or regulatory changes (cf. Kirkpatrick & Parker 2007). Secondly, the impact of existing conditionalities within the ODA arena are contested at best, and ineffective and not necessarily readily acceptable and implemented by the recipient governments, due to the fact that the social, political and economic conditions are not easily aligned with the donor ideologies (cf. Maxwell 2005; Stiglitz 2008). Thirdly, the concept of 'ownership' is a vexed issue. On the one hand, there is much support for the transfer of 'ownership' to the recipient country and at the same time, there is much evidence that donors are not willing to give up their power to dictate regulatory conditionalities (cf. OECD 2008).

Research findings suggest that project effectiveness is not entirely dependent on either the quality of conditionalities or the quality of the recipient country's project relevant policies and regulations. Thus, the question is what counts as an appropriate regulatory or policy conditionality? The answer will depend on the vantage point. Due to an absence of ODA-related RIA theoretical discourse offered by the IFIs and scholarly literature, we turn to theories underpinning general RIA theories (cf. Radaelli & De Francesco 2007). Even a cursory review of the literature shows that the prevailing theories are public choice theory and principal–agent theory, respectively (Hanisch 2008). Concerning the latter in a context of IFIs, there is an assumption that IFIs represent epiphenomenal member states' interests. At the same time, there are assumptions that RIA is an extension of economic evaluations and is achievable through *ad hoc* econometric evaluations, rather than relying on theoretical discourse about how and why conditionalities are imposed by strongly developed states on weak developing countries and their governments. This militates against a deeper analysis of conditionalities and changes to existing and/or development of new regulations or policies.

Our contention is that theoretical discourse regarding conditionalities and regulatory changes differ in terms of the extent of the causal nexuses between theoretical suppositions and the rationality for acceptance and implementation of RIA. If one focuses on orthodox neoliberal, or social neoliberal economics, it is evident that both economic orientations are heavily relying on rational choice and public choice theories, respectively (Radaelli & De Francesco 2007). Setting aside the strengths and limitations of rational choice and public choice theories, the core issue is that neither theory addresses societal issues as espoused in structural theories, especially systems theory which brings to the fore the social dimension subsuming the political dimensions and the economic circumstances within a social context exists. At the same time the orthodox neoliberal, or social neoliberal economic paradigms fail to take into consideration the political communicative action (Habermas 1987; Luhmann 1998, 2000), within which conditionalities are proposed to be implemented. Without RIA, the nexus between Structural theories such as system theory and bureaucratic procedures to implement conditionalities is akin to a 'black box' (Bourguignon & Sundberg 2007). An important fact remains, namely theorists within IFIs have mostly tried to explain and justify conditionalities on a basis of predetermined economic theories, and thus little attention has been given at theoretical level to the need to expose the conditionalities to RIA, beyond the actor-oriented theories such as the public choice and rational choice theoretical paradigms.

Setting aside the debate on advantages and disadvantages of neoliberal and other politico-economic models, key issues are quality of conditionality from a vantage point of enhancing cost-effectiveness of the ODA programme or project outcome, the legal quality of regulatory changes required under conditionality and the effectiveness of administrative formalities required to bring about regulatory changes. The notion of regulatory effectiveness can be seen as a quality issue, and may cover processes such as the way regulations based on conditionality are developed and enforced including principles of consultation, transparency and accountability. This can be achieved through a rigorous ex-ante RIA. Undertaking RIA with a focus on regulatory quality needs to include outcomes, namely providing policy decision-makers with regulations and policy alternatives showing their respective strengths and weaknesses, and political, social and economic advantages and disadvantages, cost/benefit analyses coherence of proposed regulatory changes to the country's full relevant policies and regulatory regime, and clarity so that new or changed regulations are easy to understand and to implement.

Being at risk of oversimplification, we suggest that ODA-based RIA can overcome the critical principal–agent tension as far as regulatory conditionalities are concerned. It can provide a range of solutions to the vested interest of the principal (donor) to impose certain regulatory conditionalities on the one hand and the wider social, economic and political benefits for the agent (recipient). There is sufficient evidence to show that the principal–agent model may be well suited for choosing alternatives solutions to conditionalities based on RIA. This may defuse the tension between perceived loss of control over outcomes and sharing of responsibilities in formulating and implementing regulatory conditionalities attached to ODA funding. RIA may show how well the preferences of the IFI as the principal may be able to correspond with those of the recipient government as the agent. How well the competing preferences can be aligned may well depend on the RIA and the negative or positive impacts alternatives provide, as much as on the perception of ownership and harmonisation. In this context the capacity of RIA to contribute to coherent decision-making process is entirely justifiable.

Notwithstanding the positive connotations in favour of RIA as it relates to ODA loan/grant conditionality, there are some cautionary considerations to be advanced. There is a case to be made for a measured step-by-step approach for RIA in a context of ODA conditionality. If one analyses the implementation of RIA at government levels in developing countries a rather patchy picture emerges. There are unresolved questions concerning the nexus between RIA policies and practices and case studies and theories (cf. Rihoux & Ragin 2006) that militate against how RIA in ODA may be successfully implemented, so as to benefit the recipient countries and the donors.

A second point to make in a call for a cautionary approach is the issue of quality and effectiveness of RIA. At a conceptual level we argue strongly for the potential for RIA to critically assess the positive and negative effects of proposed and existing regulations and non-regulatory alternatives, as an important element of an evidence-based approach to policy-making (OECD 2016). There are significant issues with impact assessment more generally within ODA. Issues of quality, transparency, legitimacy, efficiency, effectiveness, and ownership of the RIA are central in ensuring that RIA in this context becomes more than just another bureaucratic hurdle, or hoop to be jumped through before imposing 'pre cooked' policy prescriptions. There are also a range of opportunities for engaging with RIA in a way that draws on innovation in both theory and practice, as evinced by the wide range of ways and methods of assessing impact in policy and regulatory reform. Although we have focused on RIA, there is immense scope to look at how RIA, or associated policy impact assessment tools and methodologies may be implemented effectively in this context (as noted in the introduction). Narrow prescriptive approaches are unlikely to add value in this context. Although further analysis of these issues is out of scope of this paper, it is strongly warranted.

Conclusion

To employ RIA in the context of ODA is seen by many as a politically sensitive undertaking. It may bring to the fore negative aspects caused by political and regulatory changes as required under the terms of ODA loan or grant conditionalities. The apparent historical disinclination of IFIs to identify specific ex-ante outcomes emerging from conditionalities requiring policy and regulatory changes on the one hand, and to provide specific ex-post evaluations of such conditionality is understandable, but not recommendable. As we have seen in the discussion, there are a number of reasons for this reluctance. This includes the strong belief of major IFIs of the ideological advantages of the neoliberal economic agenda and the need for expedient disbursement of ODA funds, and the reluctance to make public potential negative effects of conditionalities on the recipient country social, economic, political and cultural structures. However, this must not militate against the advantages of RIA. The above discussion and the argument for inclusion of RIA into the ODA loan and grant project cycle provides a more consistent and informed ODA policy decision-making approach.

Our proposition is that applying RIA for analysing ODA conditionality seems to be necessary, if one wishes to advance the effectiveness of regulatory decisions and decrease low-quality and unnecessary regulations required under arbitrary conditionality. As stated above, RIA can enrich the transparency of decisions, and augment consultation and participation of affected social groups within the recipient country. Most developing countries and transition economies would potentially benefit significantly in economic, social and political terms from an improved assessment of the need and cost of conditionality before new regulations are adopted. Used appropriately, RIA affords an epistemic framework for conditionality analysis. There are compelling arguments for the proposition that the implementation of RIA is likely to increase the prospect that positive as well as negative impacts of conditionality will be identified, especially where policy and regulatory development and implementation skills may be weak.

It is important to emphasise that there is no standard or 'one-size-fits-all' RIA model. The objective of any RIA of ODA conditionalities, which require regulatory or policy changes, is to provide decision-makers with a range of alternatives, including their respective positive and negative benefits. RIA is recognised by OECD and IFIs as a catalyst for improving the effect of regulatory decision-making. RIA assesses the likely impacts of new regulations in both efficiency (quantitative) and effectivity (qualitative) terms, assisting decision-makers to make appropriate choices. By affording an evidence-based, logical, and consultative basis for regulatory policy-making, well-executed RIA procedures frequently encourage good governance contributing to the enhancement of social, political and economic features acceptable to donors as well as recipient countries. The focus here is of course on well-designed and well-executed RIA, a point requiring further discussion. Clear analysis of potential impacts of alternative policy and regulatory changes associated with conditionality in the design of aid programmes provides a potential mechanism for enhancing recipient government engagement with changes, and therefore increasing ownership, striking a much more effective balance between accountability (and oversight from the donor) and effective regulatory reform through relevant, enforceable, and effective conditions for aid, contributing to sustainable development outcomes in diverse contexts.

Notes

1. For some good examples of within-country programme experiences, see for example the NIAP program in Pakistan (http://www.niap.pk/).
2. Washington Consensus was originally a term coined by US economist John Williamson to refer to a base set of economic policy advise that 'Washington' would accept for Latin American countries as of 1989 consisting of fiscal discipline, a redirection of public expenditure priorities for economic return and income distribution such as health care and education, tax reform, interest rate liberalisation, competitive exchange rates, trade liberalisation, liberalisation of inflows of foreign direct investment, privatisation, deregulation, and secure property rights. The term is used more broadly though as a shorthand for neoliberalism.
3. Again, the term Post-Washington Consensus indicates some kind of common understanding of the term, which Marangos (2008) notes is highly inaccurate. However, the terms persist within development. See Marangos (2008) for a more detailed critique of WC and PWC.

4. A detailed review of the principal–agent problem is beyond the scope of this paper. An excellent overview of various conflicts of interest between donors and recipient governments and the resulting issues with conditionality can be found in Killick (1997).

Disclosure statement

No potential conflict of interest was reported by the authors.

ORCiD

Viktor Jakupec http://orcid.org/0000-0003-2657-5833
Max Kelly http://orcid.org/0000-0002-0036-5259

References

Adelle C, Macrae D, Marusic A, Naru F. 2015. New development: regulatory impact assessment in developing countries, tales from the road to good governance. Public Money Manage. 35:233–238.
Australian Government. 2014. The Australian Government guide to regulation, Commonwealth of Australia. Canberra: Department of the Prime Minister and Cabinet.
Biwas R. 2015. Reshaping the financial architecture for development finance: the new development banks. Working Paper No. 2/2015 London: LSE Global South Unit.
Booth D. 2008. Aid effectiveness after Accra: how to reform the 'Paris agenda'. London: Overseas Development Institute.
Bourguignon F, Sundberg M. 2007. Aid effectiveness: opening the black box. Am Econ Rev. 97:316–321.
Bresslein M., Schmaljohann M. 2013. Surrender your market! Do the G5 countries use World Bank trade conditionality to promote trade? Department of Economics Discussion Paper Series No. 550, Heidelberg: University of Heidelberg.
Bull B, Jerve AM, Sigvaldsen E. 2006. The World Bank's and the IMF's use of conditionality to encourage privatization and liberalization: current issues and practices. A report prepared for the Norwegian Ministry of Foreign Affairs as a background for the Oslo Conditionality Conference; Oslo: Centre for Development and the Environment, University of Oslo.
Cabello D, Seculova F, Schmidt D. 2008. World Bank conditionalities: poor deal for poor countries. Amsterdam: A SEED Europe.
Collier P, Dollar D. 1999. Aid allocation and poverty reduction, World Bank Policy Research Working Paper 2041. Washington (DC): World Bank
Drazen A. 2002. Conditionality and ownership in IMF lending: a political economy approach. IMF Staff Papers. 49(Special Issue):36–67.
Easterly W. 2001. The lost decades: developing countries' stagnation in spite of policy reform 1980–98. J Econ Growth. 6:135–157.
Easterly W. 2006. The White man's burden: why the west's efforts to aid the rest have done so much ill and so little good. New York (NY): Penguin Press.
Emmanuel, N. 2010. Undermining cooperation: donor-patrons and the failure of political conditionality, Democratization. 17:856–877
Engel SN. 2006. Where to neoliberalism? The World Bank and the Post-Washington consensus in Indonesia and Vietnam. In: Vickers A, Hanlon M, editors. Asia reconstructed: proceedings of the 16th Biennial Conference of the ASAA. Canberra: Research School of Asian and Pacific Studies.
European Commission 2015. Better regulation, guidelines. Commission staff working document, Strasbourg, 19.5.2015, SWD(2015) 111 final. [cited 2016 Jun 28]. Available from: http://ec.europa.eu/smart-regulation/guidelines/docs/swd_br_guidelines_en.pdf
Eyben R. 2010. Supporting inclusive democratic ownership: a how to for donors. Sussex: Institute for Development Studies, University of Sussex.
Fine B, Lapavitsas C, Pincus J. 2001. Development policy in the 21st century: beyond the Post-Washington consensus. Routledge Studies in Development Economics. London: Routledge.
Fischer TB, Sykes O, Gore T, Marot N, Golobič M, Pinho P, Waterhout P, Perdicoulis A. 2015. Territorial impact assessment of European draft directives – the emergence of a new policy assessment instrument. European Planning Studies. 23:433–451. doi:http://dx.doi.org/10.1080/09654313.2013.868292.
Friedman M. 1980. Free to choose. New York (NY): Harcourt Brace Jovanovich.
Furtado X, Smith, WJ. 2009. Ethiopia; retaining sovereignty in aid relations, In: Whitfield L, editor. The politics of aid: African strategies for dealing with donors. Oxford: Oxford University Press; p. 131–155.
Habermas, J. 1987. Theory of communicative action – lifeworld and system: a critique of functionalist reason, Vol. 2; McCarthy, TA, translator; Boston, MA: Beacon.
Hanisch A. 2008. Institutionenökonomische Ansätze in der Folgenabschätzung der Europäischen Kommission [Institutional economic approaches in the impact assessment of the European Commission]. Berlin: Logos Verlag.
Hayek FA. 1979. Law, legislation and liberty: a new statement of the liberal principles and political economy. Volume III: the political order of a free people. London: Routledge.
Hayman R. 2009. From Rome to Accra via Kigali: 'aid effectiveness' in Rwanda. Dev Policy Rev. 27:581–599.
Hermes N, Lensink R. 2001. Changing the conditions for development aid, Hermes N, Lensink R, editors. Changing the conditions for development aid – a new paradigm, London: Frank Cass; p. 1–16.
Hernandez D. 2015. Are 'new' donors challenging World Bank conditionality? Department of Economics Discussion Paper Series No. 601, Heidelberg: University of Heidelberg.
IMF. 2016. IMF conditionality. [Internet]. Rome: International Monetary Fund; [cited 2016 Feb 4] Available from: https://www.imf.org/external/np/exr/facts/conditio.htm
Jacobs S. 2004. Regulatory impact assessment an the economic transition to markets. Public Money Manage. 24:283–290.
Jakupec V, Kelly M. 2015. The relevance of Asian Development Bank: existing in the shadow of the Asian Infrastructure Investment Bank. J Regional Soc-Econ Issues. 5:31–46.
Kilby C. 2009. The political economy of conditionality: an empirical analysis of World Bank loan disbursements. J Dev Econ. 89:51–61.
Killick T. 1997. Principals, agents and the failings of conditionality. J Int Dev. 9:483–495.
Killick T. 2004. Politics, evidence and the new aid agenda. Dev Policy Rev. 22:5–29.
Killick T, Castel-Branco C, Gerster R. 2005. Perfect partners? The performance of program aid partners in Mozambique 2004. Maputo: Government of Mozambique.
Kirkpatrick C. 2014. Assessing the impact of regulatory reforms in developing countries. Public Admin Dev. 34:162–168.
Kirkpatrick C, Parker D. 2004. Regulatory impact assessment and regulatory governance in developing countries. Public Admin Dev. 12:1–12.

Kirkpatrick C, Parker D, editors. 2007. Regulatory impact assessment. Towards better regulations. Cheltenham: Edward Elgar.
Kirkpatrick C, Parker D, Zhang Y-F. 2004. Regulatory impact assessment in developing and transition economies: a survey of current practice. Public Money Manage. 24:291–296.
Koeberle S, Bedoya H, Silarky P, Verheyen G. 2005. Conditionality revisited: concepts, experiences, and lessons. Washington (DC): World Bank.
Kovach H., Fourmy S. 2006. Kicking the habit: how the World Bank and the IMF are still addicted to attaching economic policy conditions to aid. Oxfam Briefing Paper 96, Oxford: Oxfam International.
Krogstad E. 2007. The Post-Washington consensus: brand new agenda or old wine in a new bottle? Challenge. 50:67–85.
Kuczynski G, Pedro P, Williamson J. 2003. After the Washington consensus: restarting growth and reform in Latin America. Washington (DC): Institute for International Economics.
Lesay I. 2012. How post is the Post-Washington consensus? J Third World Studies. 29:183–197.
Luhmann N. 1998. Die Gesellschaft der Gesellschaft [The Society of Society]. Frankfurt a. M: Suhrkamp.
Luhmann N. 2000. Die Politik der Gesellschaft [The Politics of Society]. Frankfurt a. M: Suhrkamp.
Marangos J. 2008. The evolution of the Anti-Washington consensus debate: from "Post-Washington consensus" to "after the Washington consensus". Competition Change. 12:227–244. http://dx.doi.org/10.1179/102452908x320400.
Maxwell S. 2005. The Washington consensus is dead! Long live the meta-narrative! Working Paper 243, London: Overseas Development Institute.
Morrissey O. 2004. Conditionality and aid effectiveness re-evaluated. World Econ. 27:153–171. http://dx.doi.org/10.1111/j.1467-9701.2004.00594.x.
Murshed SM. 2009. On the non-contractual nature of donor-recipient interaction in development assistance. Rev Dev Econ. 13:416–428.
Nieminen, M, Hyytinen K. 2015. Future-oriented impact assessment: supporting strategic decision-making in complex socio-technical environments. Evaluation. Oct;21:448–461. http://dx.doi.org/10.1177/1356389015606540
OECD. 2005. The Paris declaration on aid effectiveness and the Accra agenda for action. Paris: OECD.
OECD. 2008. Financing development 2008: whose ownership? Paris: Development Centre, OECD.
OECD. 2009. Shifting aid modalities: a brief historical recapitulation, policy ownership and aid conditionality in the light of the financial crisis: a critical review. Paris: OECD.
OECD. 2012. The Busan partnership for effective development cooperation [Internet] c2012, Paris: OECD. [cited 2016 Feb 2]. Available from: www.oecd.org/dac/effectiveness/Busan%20partnership.pdf
OECD. 2014. Making development cooperation more effective: 2014 progress report. Paris: OECD.
OECD. 2015. Official development assistance – definition and coverage. [Internet]. [cited 2016 Jan 4]. Available from: http://www.oecd.org/dac/stats/officialdevelopmentassistance-definitionandcoverage.htm
OECD. 2016 Regulatory impact analysis. [Internet]. [cited 2016 Feb 18]. Available from: http://www.oecd.org/gov/regulatory-policy/ria.htm
Radaelli C. 2003. The diffusion of regulatory impact analysis: best-practice or lesson-drawing? Eur J Polit Res. 43:723–747.
Radaelli C.M., De Francesco F. 2007. Regulatory impact assessment, political control and the regulatory state. Paper delivered to the 4th General Conference of the European Consortium for Political Research; 6–8 September; Italy, Pisa.
Radelet S. 2006. A primer on foreign aid. Working Paper No. 92. Washington (DC): Centre for Global Development.
de Renzio P, Hanlon J. 2007. Contested sovereignty in Mozambique: the dilemmas of aid dependence. Managing Aid Dependency Project, GEG Working Paper, 2007/25. Oxford: Department of Politics and International Relations, University College Oxford.
Rihoux B, Ragin CC. 2006. Configurational comparative methods. Qualitative comparative analysis and related techniques. London: Sage.
Rodrik D. 2006. Goodbye Washington Consensus, hello Washington confusion? A review of the World Bank's economic growth in the 1990s: learning from a decade of reform. J Econ Literature. 44:973–987.
Sachs JD. 2005. The end of poverty: economic possibilities for our time. New York (NY): Penguin.
Schablitzki J. 2014. The BRICS Development Bank: a new tool for south-south cooperation?. Rio de Janeiro: PUC, BRICS Policy Center.
Sjöstedt M. 2013. Aid effectiveness and the Paris declaration: a mismatch between ownership and results-based management? Public Admin Dev. 33:143–155.
Staronova K. 2010. Regulatory impact assessment: formal institutionalization and practice. J Public Policy. 30:117–136.
Stiglitz JE. 2000. Globalization and its discontents. New York (NY): WW. Norton & Company.
Stiglitz JE. 2002. Participation and development: perspectives from the comprehensive development paradigm. Rev Dev Econ. 6:163–182.
Stiglitz, J.E. 2008. Is there a Post-Washington consensus consensus? In: Serra N, Stiglitz, JE editors. The Washington consensus reconsidered: towards a new global governance. New York (NY): Oxford University Press; 41–56.
Tetlow MT and Hanusch M. 2012. Strategic environmental assessment: the state of the art. Impact Assess Project Appraisal. 30:15–24.
Torriti, J., Löfstedt, R. 2012. The first five years of the EU Impact Assessment system: a risk economics perspective on gaps between rationale and practice. J Risk Res. 15:169–186.
Wathne C, Hedger E. 2009. Aid effectiveness through the recipient lens. Briefing paper 55. London: Overseas Development Institute.
World Bank. 2005. Review of World Bank conditionality. Washington (DC): World Bank.
World Bank. 2015. Worldwide governance indicators: regulatory quality definition. [Internet]. [cited 2016 Sep 7]. Available from: http://info.worldbank.org/governance/wgi/index.aspx#doc