

## **CONGRESSIONAL TESTIMONY**

Looking Forward: U.S.-Africa Relations

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Chairwoman Bass, Ranking Member Smith, and members of the committee, thank you for this opportunity to testify before you. With your permission, I would like to submit my written testimony into the record.

The views I express in this testimony are my own and should not be construed as representing any official position of The Heritage Foundation.

## U.S. Strategic Priorities in Africa

In this testimony, I will focus on what I consider to be the four most important U.S. strategic priorities in Africa that should guide American engagement with the continent.

First, the U.S. must retain sufficient influence and positioning on the continent

to protect its national interests there. This is an evergreen challenge that has grown more urgent given the rising great and middle power competition in Africa. Many countries are rapidly expanding their engagement on the continent—the U.S. should welcome that development in the case of its allies, but for aggressive American competitors such as China and Russia, it is a challenge.

One example of this problem is the port in Djibouti. Ninety percent of the equipment the U.S. military uses to conduct its operations in East Africa flow through Djibouti. Chinese companies now operate three of the five terminals in Djibouti port, whereas in early 2017 they did not operate

on Armed Services, U.S. Senate, February 7, 2019, https://www.armed-services.senate.gov/imo/media/doc/Waldhauser\_0 2-07-19.pdf.

<sup>&</sup>lt;sup>1</sup> General Thomas D. Waldhauser, "Statement of General Thomas D. Waldhauser, United States Marine Corps, Commander, United States Africa Command," testimony before the Senate Committee

any. <sup>2</sup> Losing influence and leverage in a place like Djibouti and other strategic locations across the continent will negatively affect U.S. national interests.

Another concern for the U.S. in this vein is the competition, of which Africa is a part, to develop and deploy 5G mobile network technology. Whichever country dominates the provision of 5G infrastructure will likely gain great economic benefit and a headstart on developing other future, critical technologies.

China has an immense lead in Africa. Two of its national champion companies, Huawei and ZTE, have built more than 50 3G networks in 36 African countries.<sup>3</sup> Huawei

alone has built around 70 percent of Africa's 4G networks. <sup>4</sup> A number of large African telecom companies are already negotiating with Huawei on building 5G networks. <sup>5</sup>

Huawei and ZTE's dominance of the African telecommunications infrastructure also presents a significant counterintelligence problem for the U.S. Both companies have numerous links to the Chinese state. <sup>6</sup> Huawei also built the ICT infrastructure inside the Chinese-built African Union headquarters that uploaded the contents of its servers every morning to mainland China, <sup>7</sup> and China's 2017 National Intelligence Law obligates individuals and

https://www.wsj.com/articles/china-tightens-grip-on-east-african-port-11550746800.

the "State Secrets Privilege," a tacit admission, the plaintiff argued, that ZTE is part of the Chinese government. Both companies have received significant government subsidies and other forms of help, such as Chinese banks financing many of their projects in Africa. For Huawei's founder's links to the PLA, see Elsa Kania, "Much Ado about Huawei (Part 1)," Australian Strategic Policy Institute, March 27, 2018, https://www.aspistrategist.org.au/muchado-huawei-part-1/. For ZTE asserting the "State Secrets Privilege," see Plaintiff's Amended Motion to Vacate Arbitration Award, Request for Additional Time for Discovery, and Opposition to Confirmation of Arbitration Award, Universal Telephone Exchange, Inc., vs. ZTE Corporation and ZTE USA, Inc., No. DC-10-07052 (44th Judicial Dist. Ct. Dallas County, TX). https://courtsportal.dallascounty.org/DALLASPRO D/DocumentViewer/Embedded/3AuGlaiI3Sr06C3Z ROTqiZnufL3EWn98jvm0sxCmnzg9FZCcjaHwI20C GQWDtPBh2Odjoc7n4k0vTOb-0bGnCLikUf2i\_HNMtqM5AW7VNaI1?p=0. For reports of the subsidies and financing, see "A Transactional Risk Profile of Huawei," RWR Advisory Group, February 13, 2018, https://www.rwradvisory.com/wpcontent/uploads/2018/04/RWR-Huawei-Risk-Report-2-13-2018.pdf. <sup>7</sup> Danielle Cave, "The African Union Headquarters Hack and Australia's 5G Network," Australian Strategic Policy Institute, July 13, 2018, https://www.aspistrategist.org.au/the-africanunion-headquarters-hack-and-australias-5g-

network/.

<sup>&</sup>lt;sup>2</sup> Chinese companies have recently built two of those terminals—the Doraleh Multipurpose Port and the terminal servicing the Chinese military base there, both opened in 2017—and China Merchants Port, a Chinese state-owned company, owns a stake in the Doraleh Container terminal and recently began running its daily operations. For a report on China Merchants Port running daily operations at the Doraleh Container terminal, see Costas Paris, "China Tightens Grip on East African Port," *The Wall Street Journal*, February 21, 2019, https://www.wsi.com/articles/china\_tightens\_crip.

<sup>&</sup>lt;sup>3</sup> "African Countries Close Cooperation with China Huawei," translated, Ministry of Commerce of the People's Republic of China, December 26, 2018, http://www.mofcom.gov.cn/article/i/jyjl/k/20181 2/20181202820364.shtml.

<sup>&</sup>lt;sup>4</sup> Amy Mackinnon, "For Africa, Chinese-Built Internet Is Better Than No Internet at All," *Foreign Policy*, March 19, 2019,

https://foreignpolicy.com/2019/03/19/for-africa-chinese-built-internet-is-better-than-no-internet-at-all/.

<sup>&</sup>lt;sup>5</sup> "African Countries Close Cooperation with China Huawei."

<sup>&</sup>lt;sup>6</sup> Huawei and ZTE are supposedly private, but have so many links to the Chinese government that the distinction is likely meaningless. Huawei's founder was once the director of the People's Liberation Army's Information Engineering Academy, in which capacity he had contact with a PLA unit dedicated to cyber espionage. In U.S. court filings, ZTE exercised

companies to help China's national intelligence work.8

Another perhaps underappreciated problem for the U.S. is that Chinese companies have built or renovated, or Beijing has financed, at least 63 sensitive government buildings in at least 29 African countries. 9 Beijing is the world leader in economic espionage; all Chinese companies, state-owned or private, are obliged to obey the Chinese Communist Party; and Beijing has already shown it will use its access to an important African building to bug it and compromise its ICT systems. U.S. officials should assume the many Chinese-built government buildings in Africa compromised, and avoid divulging sensitive information inside the buildings or on their ICT systems.

Second, the U.S. should facilitate regulatory and normative environments that ensure U.S. companies can compete on an even footing in Africa. If unfair economic norms that reward anti-competitive behavior

8 Elsa Kania, "Much Ado about Huawei (Part 2),"
Australian Strategic Policy Institute, March 28, 2018, https://www.aspistrategist.org.au/much-ado-

huawei-part-2/.

develop, U.S. companies will be at a disadvantage, and ordinary Africans will not reap as much economic benefit as they should. The U.S. will suffer too, as prosperous American companies strengthen U.S. economic might and contribute to American soft power.

In fact, American companies have already lost some business in Africa because of rivals' anti-competitive behavior, 10 and the future opportunities on the continent are so significant that it is a matter of national importance that American companies have a fair chance there. By 2030, an estimated 19 African economies will be growing by 5 percent or more per year, and the continent will likely constitute a \$3 trillion economy.11 The African Development Bank predicts that consumer spending in Africa will grow to \$1.4 trillion by 2020.12 Between 2015 and 2040, about 30 percent of the world's increase in energy demand will be in Africa, 13 while experts forecast the continent's mobile internet connections will double between 2017 and 2022.14

na-s-zte-was-built-to-spy-and-bribe-courtdocuments-allege-20180531-p4ziqd.html. 11 Michael Lalor, et al., "Connectivity Redefined," EY's Attractiveness Program Africa, May 2017, http://www.ey.com/Publication/vwLUAssets/evafr ica-attractiveness-report/\$FILE/eyafricaattractiveness-report.pdf. 12 "Future of Africa's Youth Does Not Lie in Migration to Europe, Adesina Tells G7," African Development Bank Group, May, 29, 2017, https://www.afdb.org/en/news-and-events/futureof-africas-youth-does-not-lie-in-migration-toeurope-adesina-tells-g7-17056/. 13 "2017 Outlook for Energy: A View to 2040," ExxonMobil, n.d., http://cdn.exxonmobil.com/~/media/global/files/ outlook-for-energy/2017/2017-outlook-forenergy.pdf. 14 Tiisetso Motsoeneng, "Africa Set to Top 1 Billion Mobile Internet Connections in Five Years: Study," Reuters, November 6, 2017. https://af.reuters.com/article/topNews/idAFKBN1

D61SV-OZATP.

<sup>&</sup>lt;sup>9</sup> Author derived numbers from a variety of sources. "Sensitive government buildings" include, for example, presidential offices, various ministry buildings, parliaments, regional council offices, and auditor-general offices. The number cited does not include the African Union headquarters or the yet-to-be-built ECOWAS headquarters, which Beijing has agreed to fund and which a Chinese company will likely build.

<sup>&</sup>lt;sup>10</sup> Joshua Meservey, "Chinese Corruption in Africa Undermines Beijing's Rhetoric About Friendship with the Continent," The Heritage Foundation Issue Brief No. 4895, August 8, 2018, https://www.heritage.org/global-politics/report/chinese-corruption-africa-undermines-beijings-rhetoric-about-friendship-the and Nick McKenzie and Angus Grigg, "China's ZTE was Built to Spy and Bribe, Court Documents Allege," The Sydney Morning Herald, May 31, 2018, https://www.smh.com.au/business/companies/chi

Third, the U.S. should encourage the growth of African democracy. The U.S. has recognized for decades the importance of promoting the global growth of democracy. It is the political system that best promotes human flourishing, and shared democratic values facilitate mutually beneficial relationships between the U.S. and other countries.

The progress in Africa on this front is mixed. In 1991, there were only four African electoral democracies, but that number rose to 20 by 2014. However, in recent years democratic backsliding has beset some countries, with repressive laws designed to muzzle civil society and internet shutdowns by the authorities becoming more common.

The pressure on African democracies is likely to continue in the coming years, not least because of China's influence across the continent. The Chinese Communist Party disdains democracy, viewing it as a threat to its own authoritarian model and as a chaotic and inefficient system. <sup>16</sup> Under President Xi Jinping, Beijing is more aggressively seeking to persuade African rulers and thought leaders to embrace its own repressive governance model and eschew democracy. <sup>17</sup> We are likely already seeing the effects of

China's efforts in the recent undemocratic trends in some countries.<sup>18</sup>

Finally, the U.S. must ensure terrorists cannot use the continent as a staging ground for attacks on U.S. soil or its overseas interests. One of the lessons of the 9/11 terror attacks was that a terrorist safe haven even thousands of miles away can threaten the U.S. homeland. Unfortunately, the conditions in a number of African countries make them susceptible to use as safe havens. According to the 2018 Fragile States Index, four of the world's six most-unstable states are African. The best-ranked African country is the small island nation of Seychelles, which was the only African country in the "stable" category. 19 The prevalence of impoverished and poorly states contributes governed unfortunate reality.

Despite some of the continent's most prominent terror groups such as al-Shabaab in Somalia, Boko Haram in Nigeria, and ISIS in Libya suffering setbacks in recent years, the terror threat on the continent remains potent. According to the 2018 Global Terrorism Index, 12 of the world's 23 countries most affected by terrorism were in Africa.<sup>20</sup> The African Center for Strategic

<sup>15 &</sup>quot;Tracking Africa's Progress in Figures," African Development Bank Group, 2014, https://www.afdb.org/fileadmin/uploads/afdb/Doc uments/Publications/Tracking\_Africa%E2%80%99 s\_Progress\_in\_Figures.pdf. 16 Liza Tobin, "Xi's Vision for Transforming Global Governance: A Strategic Challenge for Washington and Its Allies," Texas National Security Review, Vol. 2, Issue 1, November 2018, https://tnsr.org/2018/11/xis-vision-fortransforming-global-governance-a-strategicchallenge-for-washington-and-its-allies/. <sup>17</sup> Aaron L. Friedberg, "Competing with China," Survival: Global Politics and Strategy, Vol. 60, No. 3 (June-July 2018), pp. 7-64, https://www.iiss.org/publications/survival/2018/s urvival-global-politics-and-strategy-junejuly-

<sup>2018/603-02-</sup>friedberg, and Denis M. Tull, "China's Engagement in Africa: Scope, Significance and Consequences," The Journal of Modern African Studies, Vol. 44, No. 3 (Sep., 2006), pp. 459-479, http://archives.cerium.ca/IMG/pdf/Tull.pdf. 18 Adrian Shahbaz, "Fake News, Data Collection, and the Challenge to Democracy," Freedom on the Net 2018, Freedom House, n.d., https://freedomhouse.org/report/freedomnet/freedom-net-2018/rise-digitalauthoritarianism. 19 2018 Fragile States Index, Fund For Peace, n.d., http://fundforpeace.org/global/2018/04/24/fragil e-states-index-2018-annual-report/. <sup>20</sup> Global Terrorism Index 2018, Institute for Economics & Peace, n.d., http://visionofhumanity.org/app/uploads/2018/12 /Global-Terrorism-Index-2018-1.pdf

Studies counts 27 discrete terror groups on the continent operating primarily in 11 countries.<sup>21</sup>

The resurgence of Islamist terror groups in the Sahel region is particularly worrisome. The collapse of Muammar Gaddafi's regime in 2011 poured weapons and trained fighters into particularly northern Mali, contributing to the surge in the capabilities of Sahelian armed groups. Reports of violent acts by Islamist terror groups in the Sahel have doubled every year since 2016, as have reports of fatalities linked to the violence.<sup>22</sup>

Two groups merit particular attention. The Islamic State West Africa Province conquered hundreds of square miles in Nigeria, Chad, and Niger at the beginning of this year alone, overwhelmed a dozen military bases, and has an estimated 3,500 fighters. <sup>23</sup> Jama'at Nusrat al Islam wal Muslimeen is an alliance of four terror groups that formed in 2017, and was responsible for about half of all the terrorist-related violence in the Sahel in 2018.<sup>24</sup>

A long-term component of the terrorist problem is the spread of the Wahhabist practice of Islam in Africa. Saudi Arabia in particular has proselytized across the world this fundamentalist practice of Islam 25 to which most current Islamist terrorist groups subscribe.<sup>26</sup> In many part of Africa. Wahhabism has pushed back Sufism, the syncretic and generally tolerant practice of Islam traditional to much of the continent, and has supplanted it entirely as the dominant practice in East Africa. 27 While only a small minority of Wahhabists ever radicalize to Islamist violence, Wahhabism's spread has broadened the pool of people who share many theological tenets with Islamist terrorists.28

Saudi Arabia and other governments such as Qatar and Kuwait that financed terrorist organizations or Wahhabist proselytization, or whose citizens did so, appear to have decreased or largely stopped those activities. However, the challenge of the spread of Wahhabism in Africa remains, and any U.S. strategy towards the continent should address it.

the-sahel/.

https://www.foreignaffairs.com/articles/middle-east/2016-01-12/roots-lone-wolf-terrorism <sup>26</sup> For an explanation of the (minor) differences between Wahhabism and Salafism, another term analysts frequently use to describe the ideology of most current Islamist terrorist groups, see Peter Mandaville, *Global Political Islam* (London: Routledge, 2005), p. 247

<sup>27</sup> Abdisaid M. Ali, "Islamist Extremism in East Africa," Africa Center for Strategic Studies, August 9, 2016.

http://africacenter.org/publication/islamist-extremism-east-africa/.

<sup>28</sup> "Kenyan Somali Islamist Radicalisation," International Crisis Group Africa Briefing No. 85, January 25, 2012,

https://d2071andvip0wj.cloudfront.net/b085-kenyan-somali-islamist-radicalisation.pdf and Mark Woodward, "Turning Up the Heat on Wahhabi Colonialism," Arizona State University, September 2, 2009, http://csc.asu.edu/2009/09/02/turning-up-the-heat-on-wahhabi-colonialism/.

<sup>&</sup>lt;sup>21</sup> "More Activity but Fewer Fatalities Linked to African Militant Islamist Groups in 2017," Africa Center for Strategic Studies, January 26, 2018, https://africacenter.org/spotlight/activity-fewer-fatalities-linked-african-militant-islamist-groups-2017/.

<sup>&</sup>lt;sup>22</sup> "The Complex and Growing Threat of Militant Islamist Groups in the Sahel," Africa Center for Strategic Studies, February 15, 2019, https://africacenter.org/spotlight/the-complexand-growing-threat-of-militant-islamist-groups-in-

<sup>&</sup>lt;sup>23</sup> Joe Parkinson and Drew Hinshaw, "Islamic State, Seeking Next Chapter, Makes Inroads Through West Africa," *The Wall Street Journal*, February 3, 2019, https://www.wsj.com/articles/islamic-state-seeking-next-chapter-makes-inroads-through-west-africa-11549220824.

<sup>&</sup>lt;sup>24</sup> "The Complex and Growing Threat of Militant Islamist Groups in the Sahel."

<sup>&</sup>lt;sup>25</sup> Andrew L. Peek, "The Roots of Lone Wolf Terrorism," *Foreign Affairs*, January 12, 2016,

## The Stakes

Africa will only increase in significance in the coming decades. In addition to its economic importance mentioned earlier, the continent touches three of the world's eight maritime chokepoints, abuts Europe and Asia, and has thousands of miles of Atlantic and Indian Ocean coastline. In 2014, the continent also had the largest or secondlargest known reserves of ten important mineral resources. <sup>29</sup> Included in Africa's share of the world's reserves are 22 of the 33 mineral commodities the U.S. deems critical to its economy and national defense, and for which the U.S. is more than 50 percent import reliant.<sup>30</sup>

African countries are diplomatically important as well, comprising the largest geographical voting bloc in international fora. Africa is also the world's fastest growing, and youngest, continent. Its population is projected to double by 2050 and quadruple by 2100, which would mean one-third of the world's population would be African. 31 The only sure prediction surrounding this trend is that it will have a profound impact on the world, one policymakers need to be planning for now.

For these and other reasons, powers such as China, Russia, Turkey, Saudi Arabia, Japan, India, and many others are jockeying for influence on the continent. Seven different countries, including the U.S., have military bases in the Horn of Africa. Some of these countries are American competitors, and the U.S. needs a strategic and energetic approach to successfully manage the challenges they bring.

## The Way Ahead

Late last year, National Security Advisor John Bolton unveiled the Trump administration's Africa strategy. Strategies focus on "big-picture" ideas and guiding principles, so it is unsurprising the administration's Africa strategy lacked detail in some areas. We will have to wait for more specifics on some of the promised new programs before we can fully assess the strategy.

For now, however, I believe the strategy got "big-picture" themes correct. It acknowledged the paramount challenge of powerful and increasingly expeditionary geopolitical competitors such as China and Russia, but did not abandon altogether. counterterrorism Trade and happily, investment is, central

https://www.wsj.com/articles/theres-a-globalrace-to-control-batteriesand-china-is-winning-1518374815?mod=e2tw. The 22 critical mineral commodities found in Africa are Aluminum, Antimony, Arsenic, Barite, Cesium, Chromium, Cobalt, Fluorspar, Graphite, Lithium, Manganese, Niobium, Platinum-Group Metals, Rare Earths, Rubidium, Tantalum, Tin, Titanium Mineral Concentrate, Tungsten, Uranium, Vanadium, and Zirconium. Variety of sources compiled by author. 31 Gilles Pison, "There's a Strong Chance that One-Third of All People will be African by 2100," The Conversation, October 10, 2017. http://theconversation.com/theres-a-strongchance-that-one-third-of-all-people-will-be-africanby-2100-84576.

<sup>&</sup>lt;sup>29</sup> *2014 Minerals Yearbook: Africa*, U.S. Geological Survey of the U.S. Department of Interior, December 2017,

https://minerals.usgs.gov/minerals/pubs/country/2014/myb3-sum-2014-africa.pdf.

<sup>&</sup>lt;sup>30</sup> The U.S. currently imports at least some of its supply of 15 of those 22 critical mineral commodities from China and/or Russia. China dominates the global supply chain for cobalt—necessary for making lithium-ion batteries which may be critical to powering self-driving cars, a potentially massive industry in the near future—50 percent of which is produced in the Democratic Republic of Congo. For the statistics on cobalt, see Scott Patterson and Russell Gold, "There's a Global Race to Control Batteries—and China Is Winning," *The Wall Street Journal*, February 11, 2018,

component—having as many of the U.S.'s world-class companies operate on the continent as possible will create jobs in the U.S. and Africa, give African governments value for their money, and create deeper and more equitable partnerships with African countries.

The details of the strategy's "Prosper Africa" initiative will be key, as it appears designed to translate the strategy's vision for a trade and investment-centric approach to Africa into reality. Indications are that the administration is serious about the effort and is approaching it in a thoughtful way, but we will have to wait for the final details to emerge to know how effective it can be.

The strategy is an important development for U.S.-Africa relations, but all branches of government, the business community, the African diaspora in the U.S., and civil society have an important role to play in making U.S. engagement with Africa as effective as possible.

A smart approach to Africa requires the U.S. to stretch its limited resources farther. The U.S. should assess with which governments it can reasonably expect to have a positive, mutually beneficial, and strategic partnership. Considerations should include whether a government has a demonstrated desire and capacity to meaningfully improve its governance, and whether the country is strategically important enough to merit special engagement. That calculation should on the country's hinge geostrategic positioning, endowment of natural resources, economic potential, population size, and the presence of competitors, allies, and other relevant challenges.

Countries that are good candidates for a strategic partnership should receive the full suite of U.S. engagements, such as: consideration for a free-trade agreement, if

practicable; fully staffed U.S. embassies, including with a commercial attache; U.S. government-facilitated visits by U.S. business delegations; high-level U.S. official visits and interventions on behalf of U.S. companies; and mobilization of that country's U.S. diaspora to invest and engage in other constructive ways.

There are additional ways the U.S. can help African countries boost their economic growth that will also benefit the U.S. Ideas include:

- Helping U.S. businesses identify local African partners, often a critical component for success;
- Facilitating linkages between African countries and U.S. state governments, which best understand their local companies and the opportunities they might enjoy in Africa;
- Fostering African entrepreneurs by facilitating exchanges or internships with them and U.S. tech companies; hosting innovation competitions in Africa; and persuading U.S. business luminaries to visit the continent or get involved in other ways;
- Assisting African countries to become more business friendly by helping them improve their regulatory environments by, for example, embedding U.S. technical experts in the central banks or commercial ministries of willing countries; and helping the regional economic communities more deeply integrate. thereby creating larger markets and lowering costs of doing business across borders:
- Aiding African countries to get the best possible deals from Chinese investment by helping build their capacity to assess contracts and ensure compliance;
- Tasking U.S. embassies with identifying and facilitating commercial opportunities for U.S. companies. The

Championing American Business Through Diplomacy Act has good ideas for achieving this.

Fostering good governance must continue to be a critical part of U.S. engagement with African countries. The U.S. can:

- Assist civil society in Africa by, for instance, facilitating exchange programs for African civil society leaders within the continent, or to the U.S., to learn from one another;
- Fight corruption by elevating the issue as part of U.S. development assistance, helping civil society organizations track and publicize corruption, and promoting economic freedom;<sup>32</sup>
- Deepen coordination and cooperation with allies active on the continent, and who are a positive influence towards good governance.

Other efforts the U.S. should make to pursue its strategic priorities in Africa include:

Creating a strategic messaging initiative that explains to African countries the benefits of partnering with the U.S. The initiative should refute the narrative that the U.S. is withdrawing from Africa. The U.S. remains the largest investor in Africa,<sup>33</sup> is by far the continent's largest provider of overseas development assistance, has significant numbers of its major companies operating on the continent, and continues large, innovative initiatives—some now nearly decades old—such as

President's Emergency Plan for AIDS Relief. African the Growth Opportunity Act. the Millennium Challenge Corporation, Power Africa. and Feed the Future, that have saved and improved millions of lives across the continent. The initiative should also advocate for democracy as the political system with the best record of not only protecting individual rights, but also delivering economic prosperity;

- Making the U.S.-Africa Leaders Summit a Routine Event;
- Pressuring any states still funding the proselytizing of fundamentalist interpretations of Islam to stop, and to crack down on their citizens' funding;
- Ensuring that the new United States International Development Finance Corporation achieves its stated purpose of supporting the U.S. in its strategic competition with China. Congress should vigorously exercise its oversight authority to ensure it does so.

Africa is a hugely important continent, and U.S. engagement has not recalibrated to account for the rapid changes on the continent. There is still time, and hearings like this one and other activities happening across the government, private sector, and civil society give me hope that the U.S. is moving in the right direction.

Thank you again for this opportunity to testify, and I look forward to any questions you may have.

<sup>32</sup> For a more in-depth discussion, see Joshua Meservey, "The Impact of Corruption on Economic Development in sub-Saharan Africa" in 2017 Global Agenda for Economic Freedom, James M. Roberts and William T. Wilson, eds., The Heritage Foundation Special Report No. 188, https://www.heritage.org/international-

economies/report/2017-global-agenda-economic-freedom.

<sup>&</sup>lt;sup>33</sup> EY Attractiveness Program: Africa, EY, October 2018, https://www.ey.com/za/en/issues/business-environment/ey-attractiveness-program-africa-2018#section4.

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