

SNBC Guide 2

# Tackling Red Tape to Reduce Bribery: Anti-corruption as a problem-solving tool in the fisheries sector

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## About this series

This is the second in a series of four guides that provide practical guidance on the potential applications of behavioral science towards enhancing anti-corruption and conservation efforts.

This resource provides insights into how red tape, a common issue that generates corruption risks in the fisheries sector and beyond, can be addressed not only by simplifying rules and procedures but also by incorporating strategic insights to help change the attitudes and behaviors of target groups.

The series includes three other guides:

1. [An introduction to social norms and behavior change \(SNBC\) approaches](#)
3. [Addressing collusive corruption in community-managed forests](#)
4. [Supporting front-line wildlife defenders through social norms approaches](#)

## What is the problem?

Proper regulation of critical sectors such as fisheries, forestry and wildlife is key to preventing corruption and achieving natural resource management (NRM) and conservation goals. However, the precise scope and level of complexity required to effectively achieve this regulatory function is not always clear. Furthermore, regulatory frameworks are often made up of incremental pieces of legislation and regulations that are not necessarily coherent with each other and which may create an inordinately complex bureaucracy, or “red tape.” [Red tape](#) is a “series of actions or complicated tasks that seem unnecessary but that a government requires one to do in order to get or do something.” (Britannica Dictionary)

Red tape generates corruption risks because it increases opportunities for officials to abuse their roles and incentivizes bribery (Martini 2013). Corrupt public officials can take advantage of complicated regulations to purposefully create obstacles to providing services or to threaten sanctions for non-compliance with burdensome requirements, all in order to extract bribes. Red tape also triggers negative reactions from citizens, confirms negative stereotypes about the state and reinforces social norms that normalize corruption ([see Guide 1](#)). Red tape, therefore, generates unnecessary and unwanted costs to the public and economic operators, giving rise to incentives to offer bribes to avoid it. Red tape is particularly problematic in contexts where economic activity is largely informal; in such cases, formal controls or requirements very often result in more corruption because informal (undocumented, lacking permits, etc.) actors fall astray of even more regulations (Baez Camargo et al 2022).

In natural resource sectors, long, obscure and complex supply chains often characterize management and trading systems, with red tape affecting transparency, traceability, and effective management at every step. In the case of fisheries, illegal, unreported and unregulated (IUU) fishing is

a critical global problem contributing to economic loss and depletion of marine ecosystems. IUU fishing can happen in many forms, for example when vessels go beyond the zones in which they are authorized to operate in, and involves practices that can be extremely hard to monitor, such as exceeding permitted catch quotas (see [here](#) for a detailed discussion of IUU and corruption in the case of Colombia). While several resources have increased awareness on how corruption happens along the supply chain (see [TNRC Guide: Identifying Corruption Risks along a Fishery Supply Chain](#)), it is important to highlight the role of red tape in driving and exacerbating both corruption and IUU fishing risks.

One specific way that red tape exacerbates IUU fishing is by disincentivizing informal fishers from registering and becoming compliant with laws and regulations related to managing the fishery. Informal fishers are doubly vulnerable to corruption because of their lack of compliance and because they may not know enough about the prevailing regulations to know what their compliance obligations are. These factors can be exploited by officials to extort bribes. Furthermore, informal fishers are more likely to proactively offer bribes to avoid dealing with cumbersome red tape, escape sanctions, and when there is a shared belief (or perceived social norm) about bribery being the normal way to operate.

## What is being done?

The fisheries sector clearly needs to be adequately regulated in order to combat IUU fishing. At the international level, initiatives such as the Global Dialogue for Seafood Traceability (GDST) launched by WWF in 2017 are key, but they are also shedding light on the risks of rapidly changing regulatory environment leading to incoherent requirements across jurisdictions (Freitas 2021). Such incoherency can be considered as red tape, providing opportunities to exploit or evade complex regulations through bribery and other forms of corruption. At the national level, there is agreement that more transparency and accountability is needed in the allocation and issuance of access



rights and permits in fisheries and other sectors where harvesting and trading of wildlife requires regulation (Outwaite 2020).

Reducing red tape can contribute to these objectives, and behavioral science highlights how: simplifying the desired behaviors—like registering a boat or recording a catch—reduces the “[sludge](#)” that makes abiding by the rules difficult. This may not necessarily involve removing steps in the process; it could instead involve reducing the time and effort required to complete those steps. Automation can be instrumental in pursuing such goal, and this was part of the rationale informing the development of e-permitting systems in the scope of CITES (see [CITES 2015](#)). Box 1 offers some other options.

### Box 1. Tools to address red tape

The following are among the best-practice tools to address red tape that are commonly recommended:

- » Process re-engineering: referring to reducing the number of requirements required by authorities and facilitating compliance through redesign, elimination of redundant steps, and use of technology
- » Developing one-stop-shop approaches to minimize the number of agencies and transactions that need to be involved in any particular process
- » E-government and use of ICTs
- » Simple and accessible guidelines on regulatory frameworks

Source: Martini 2013

## What can be done through the application of behavioral insights?

While it is clear that all of the above recommendations are important and needed, applying behavioral insights can make efforts to deal with red tape more impactful. Why?

First, reducing red tape harnesses the behavioral principle of simplifying—or reducing sludge—to make compliant behavior easier. The more regulations are made clear, transparent and user-friendly, the more people will find it easy to adhere to them.

But there is more to it. A recent study found that red tape can trigger strong negative emotional responses among those who encounter it. Red tape produces confusion, frustration, and anger, reducing trust in government and providing the rationale for breaking rules (Hattke et al 2019). This finding eloquently clarifies the deep psychological roots behind the frequently-observed pattern whereby citizens try to avoid red tape through rule breaking.

Reducing red tape therefore should be at the forefront of fighting corruption and promoting trust in state institutions. To be most effective, reformers and practitioners designing interventions to tackle red tape should carefully consider the attitudes, challenges confronted and characteristics of the intended target group of users that will benefit from the change.

### Elements to consider are:

- » **Level of trust in state (or other relevant) institution(s):** If levels of trust are already low, it will take more than a good technical approach to reducing red tape, because mistrust will get in the way of the uptake of simplified procedures.
- » **Level of legal literacy and familiarity with procedural issues of the target group:** Some aspects of regulation and management of the fisheries supply chain are highly technical by nature. Even “simplified” procedures can be challenging to navigate.

» **Access to information patterns:** Understanding how and where the intended target group accesses information or, where or how they can be reached, is crucial to ensure that information about new procedures reaches them.

A strategic communications campaign in support of red tape-reducing initiatives can help persuade individuals of the benefits of using new procedures where trust or literacy issues have been identified. Elements that could inform such a campaign include:

» **Challenging conventional wisdom about dealing with official procedures:**

– Showcase reduced processing times, ideally through short but compelling testimonials or “edutainment” clips.

» **Showcasing the benefits of becoming compliant:**

– Develop short but compelling narratives that illustrate the business case for stepping out of informality and adopting more rule-abiding behaviors.

» **Choosing the right messenger, depending on the audience’s levels of trust and preferences:**

– In some cases, the credibility of new processes requires that they be endorsed by the relevant

authorities.

– In other cases, endorsement by a public, trusted figure (e.g. the head of the trade union, a community leader, a famous fisher) can be more compelling.

» **Producing and forcefully disseminating actionable information:**

– Distributing easy-to-follow tutorial materials that illustrate how to obtain a permit or license under the new simplified procedure.

– Disseminate officially endorsed checklists of documents required to obtain a permit that can be brought along to be proactively referred to in case of attempted bribery.

Box 2 illustrates a promising approach to deal with red tape in fisheries that already embraces some of the elements proposed above. Table 1 shows how key principles from behavioral science, outlined in Guide 1 of this series, relate to this example. Table 2 illustrates how an SNBC approach can harness the impact of the app described in Box 2 to prevent corruption and highlight success stories to positively shift social norms at both the individual and institutional levels.

### **Box 2. Helping fishers address red tape in Peru**

WWF Peru identified informality among artisanal fishers as an important challenge to the sustainability of the sector. A complex bureaucratic burden associated with acquiring the proper permits is partly behind the prevalence of high informality. Even formalized fishers often find the bureaucracy overwhelming, and despite best efforts, they end up failing to maintain compliance with all the requirements. This situation generates high corruption risks and contributes to IUU fishing.

WWF Peru decided to tackle the problem by developing a simple app, TrazApp, that helps fishers obtain key documents they need, such as official departure certificates. Notably, the app was designed on the basis of “having developed trusting relationships with fishers and learning of their difficulties navigating the official requirements and the irregular practices they sometimes encountered” ([WWF/TNRC n.d.](#)).

The work behind the app included untangling a complicated web of bureaucratic requirements and working through a lack of coordination among the many agencies that are involved in the governance of the fisheries sector in Peru. It was informed by extensive interviews and surveys with government officials and fishers to ensure the app would, on the one hand, strictly comply with government regulations and, on the other hand, be responsive to the actual needs of fishers.

The app has been piloted, and preliminary results are promising: 60% of surveyed fishers agreed that TrazApp will improve the departure certificate process.

**Table 1. Principles for SNBC to combat corruption in fisheries in Peru**

| Behavior Change ‘Principle’           | Illustration of this in Peru   |
|---------------------------------------|--|
| <b>Enabling Environment</b>           | Regulations were in place to help ensure the sustainability of the fishing fleet in Peru, but these were considered unworkable in real terms due to their complexity and corrupt enforcement   |
| <b>Insight and Targeting</b>          | Research insight revealed the context and drivers for corruption related to departure certificates and other documentation and clarified the potential target audience for SNBC initiatives as artisanal fishers operating informally                              |
| <b>Frameworks and Theory</b>          | Elements of <a href="#">WWF’s SAVE NATURE PLEASE</a> framework were considered in the development of TrazApp, and the <a href="#">COM-B</a> model was relevant   |
| <b>Messages and Messengers</b>        | WWF acted as a messenger by adopting the role of a trusted neutral observer and “problem solver,” and focused messaging on the suitability and convenience of the app and reduced time and effort required to use it, rather than penalizing poor past performers. |
| <b>Repetition, Adaptation, Reward</b> | A “co-design” approach was used in the development of the app, and consultation on the Beta version. The pilot audience revealed 60% thought it would improve the departure certificate process.   |

**Table 2. Mixed Methods for SNBC to combat corruption in fisheries in Peru**

|                     | Prevention  | Persuasion  |
|---------------------|---|---|
| <b>Individuals</b>  | Roll-out of the app will be tracked, and port officials will increase enforcement of the relevant catch documentation scheme / regulations governing type and size (weight) of the harvest. Offenders will be fined and their case profiled if necessary. | Following completion of the pilot phase, champions among artisanal fishers will be engaged as influential messengers to persuade uptake by their peers, with celebration of their efforts through local paper news items. |
| <b>Institutions</b> | Increased scrutiny will be applied to the local fishing communities to assess changes in the profile of landed catch and penalize boats / fleets with routine excess catch where necessary.   | WWF will work with SERFOR and the port authorities to profile success factors, including perhaps as part of reporting against the CITES Resolution on Anti-Corruption (Res Conf 17.6).                                    |

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### About Targeting Natural Resource Corruption

The Targeting Natural Resource Corruption (TNRC) project is working to improve biodiversity outcomes by helping practitioners to address the threats posed by corruption to wildlife, fisheries and forests. TNRC harnesses existing knowledge, generates new evidence, and supports innovative policy and practice for more effective anti-corruption programming. Learn more at [tnrcproject.org](http://tnrcproject.org).

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