

**Anti-Corruption Policy Failure:
The Case of Moldova's Billion Dollar Scandal**

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Abstract

Ever since its independence from the Soviet Union, Republic of Moldova has been struggling with nation and state building, albeit with limited success. After a quarter century of self-rule, Moldova is best known as the poorest country in Europe. Ethnic and geopolitical cleavages are tearing the country apart. A vocal minority of the public would like to reunite with Moldova's kin state Romania; whilst about half of the country would prefer joining the European Union, rivalled by an almost equally large part, who, instead, long for the Soviet Union and prefer a rapprochement with Russia. Thus, building effective state institutions and implementing sound public policy has been a challenge. Corruption has become endemic, despite commitments by the government to mitigate it. Even after the implementation of New Public Management reforms and the pluralisation of policymaking process, the country is nowhere nearer to effectively mitigating the endemic corruption that cripples the state.

The paper will apply the principal agent model to a major case of anti-corruption policy failure, which became known as 'the billion dollar scandal'. The paper will argue that, contrary to mainstream theoretical expectations, the implementation of New Public Management and the pluralisation of policy process in Moldova, not only failed to preclude, but may have, inadvertently, contributed to regulatory capture. The key problem is the lack of agent independence from the principal(s) as well as constant reshuffling of prerogatives and lines of accountability. Hence, an acrimonious blame game ensues, not only between institutions, but also among political parties both within and beyond the ruling coalition, which makes both policy making and policy delivery incredibly difficult.

The paper first offers an introduction into Moldova's experience with New Public Management reforms and policy pluralisation, after which it provides an account of the so called "billion dollar scandal," also reviewing its public policy implications. Finally, the paper suggests a new perspective for addressing anti-corruption policy implementation in the Moldovan case, which could also be applied to the broader post-Soviet contexts, where traditional application of principal agent framework has not yielded desirable results.

Introduction

Ever since its independence from the Soviet Union in 1991, Moldova has been struggling with both nation and state building. A quarter century has passed and the country is nowhere near a civic nation or a successful democratic state. The crisis of identity is tearing the poorest country in Europe apart. On the one hand, about 20 percent of Moldovan citizens would like to reunite with Moldova's kin state Romania (Institute of Public Policy, 2017). Supporters of unification with Romania are, mostly, part of a larger group, who see the future of Moldova as a member of the European Union. At the same time, an equally large part, indeed almost half of the country's population, longing still for the fall of the USSR, would prefer a rapprochement with Russia and integration into the Eurasian Economic Union (International Republican Institute, 2017). In this context of a widening geopolitical divide, building effective state institutions and implementing sound public policy has been a challenge. Corruption has become endemic, despite repeated commitments by the government to mitigate it. The extent of political corruption became manifest during a major financial scandal, which proved to have direct links to leading political figures in the country. The scandal and its aftermath have become the embodiment of national anti-corruption policy failure.

The paper offers a case study into the most severe national political scandal in Moldova's independent political history. Throughout 2012-2014, three Moldovan banks have issued loans to politically connected business entities that never intended to pay the money back. As the banks faced bankruptcy and risked creating mass contagion in the country's financial system, the government was forced to bail these banks out before withdrawing their licences and shutting them down. The damage amounted to almost one billion US dollars, which is about 15% of Moldova's GDP (BBC 2015; Bloomberg 2014, 2016). The failure to enforce the law on the part of Moldova's regulatory authorities, mainly the National (Central) Bank and the National Financial Market Commission was manifest, as later indicated in an independent report by Kroll Inc. – an American corporate investigations and risk consulting firm commissioned by the National Bank to scrutinise the case (2015). Yet, the law enforcement, primarily the National Anti-Corruption Commission as well as the Office of the Prosecutor General have also failed to act, even though they had had all the information about the ongoing suspicious financial activity in the three banks, as confirmed by the head of the abovementioned institutions during subsequent Parliamentary hearings (Infotag, 2015), raising experts' concerns about regulatory and even state capture (Tudoroiu, 2015:660).

This paper analyses Moldova's experience in fighting corruption through the prism of New Public Management (NPM) reforms. While acknowledging the merits of NPM and its further potential in the Moldovan policy landscape, particularly through the ongoing process public policy pluralisation in the context of European integration, the author will critically examine the role of policy pluralisation and how this process impacts policy making and delivery in the field of anti-corruption. The paper relies on the principal agent theory (PAT) in order to analyse the failure of anti-corruption policy in Moldova. It looks into the underlying reasons of policy failure and suggests some solutions.

By employing the PAT model, the paper presents a case of anti-corruption policy failure and argues that, in the Moldovan example, the implementation of New Public Management and the pluralisation of policy, not only failed to preclude, but may have, inadvertently, contributed to regulatory capture. There are multiple reasons for these adverse effects, stemming from the country's Ottoman and Communist legacies, underdevelopment, low human capital, reduced administrative capacity and limited political will for quality implementation of reforms. The communist past and early days of transition to democracy and market economy are particularly important in explaining the current state of affair. It has been argued that the level of economic development, particularly when it comes to the degree of early industrialization, and self rule experience prior to the communist period has an important effect on the type of communism that takes shape in that country and the subsequent nature of the political and party systems after communism (Kitschelt, 1995). In this sense, Moldova was ill positioned, as the country was at the periphery of industrialization, being largely an agrarian society. Furthermore, Moldova never experiences modern self rule prior to the fall of the Soviet Union and had always served as a bargaining chip between larger regional powers.

However, the paper is not focused primarily on the implications of the country's historical legacies dating back centuries, but rather looks at modern day institutional causes of anti-corruption policy failure since Moldova's independence in 1991. Certainly, history and culture play a very important role, but they cannot completely determine the success or failure of policy objectives in the field of anti-corruption. Otherwise, we would not observe such wide variation in countries that have come from relatively similar historical backgrounds such as the Baltic States, Romania, Bulgaria and Moldova (Transparency International CPI, 2016). One factor that could explain that kind of variation among relatively similar cases focuses on institutions. Namely, lack of politically independent institutions is often identified in the

literature as one of the major causes of anti-corruption policy failure (Klitgaard, 1988; Heidenheimer et al., 1989; Chavez et al., 2003). Lack of agent independence (regulatory and law enforcement bodies) from the principal (government/parliament) as well as constant reshuffling of prerogatives and lines of accountability and control creates major impediments to effectively controlling corruption (Sappington, 1991:63). Due to political control and volatile institutional framework, an acrimonious blame game ensues, not only between institutions but also among political parties, both within and beyond the ruling coalition, which makes both policy making and policy delivery more difficult. In order to better understand Moldova's current challenges with anti-corruption policy, one needs to first review the country's track record of transition from communism to democracy and free market.

New Public Management in Moldova

Unlike countries in the central European socialist bloc that had experienced what Herbert Kitschelt (1995) called bureaucratic authoritarian communism (German Democratic Republic, Czechoslovakia) and national consensual communist (Poland, Hungary), Moldova along with the rest of the Soviet Union republics as well as the Balkan countries had undergone patrimonial despotic communism. As pointed out by Kitschelt (1995), the latter was characterized by low levels intra elite contestation, low popular interest articulation, low rational bureaucratic institutionalization, strong hierarchical chains of personal dependence, extensive patronage and clientelistic networks, which influenced to a large degree the democratic transformation process. In fact, the communist elites in patrimonial despotic communism countries were so powerful compared to the rest of society that they managed to employ preventive reforms, ensuring that their grip on power is not challenged. Unlike, central and eastern Europe, where communist regimes either completely imploded being repudiated by the society (German Democratic Republic) or they engaged in a bargaining process with the new democratic elites (Poland, Hungary), carving out only a limited space for perpetuating their interests; in countries like Moldova the old soviet elite managed to maintain almost full control over the political process after they had rebranded themselves into social democratic parties. This inadvertently left a mark on the more recent process of the country's transformation, which has occurred under the fashionable banner of New Public Management (NPM) reforms.

Moldova has witnessed several rounds of NPM reforms. The early stages of NPM were introduced as soon as Moldova gained independence from the Soviet Union and started the long

and strenuous process of moving from a centralized planned economy and a one party authoritarianism towards market economy and a pluralist political system. The major reforms of this period focused on de-collectivisation and privatisation of state owned enterprises based on a vouchers issuing system (Gudym, 1999:131; Estrin et al., 2004:33). Workers become shareholders overnight, but with little to no knowledge about the value of their stocks. Hence, many were persuaded into selling their shares for virtually nothing, while others were eager to sell in the hope of escaping the abject poverty that plagued the country following the collapse of the Soviet Union and its currency - the rouble, which wiped out almost all of the people's lifetime savings. Still, the few people that kept their shares were not much better off, as companies seldom paid dividends and, when they did, the amounts were symbolic to say the least. Enjoying asymmetric inside information, managers of the previously state owned enterprises often became the main shareholders by buying the shares from the employees (Estrin et al., 2004:33). In the end, these managers became the main beneficiaries of the privatisation process, casting a shadow of illegitimate gains on the vast majority of assets privately acquired in the early 1990s. This profound sense of a corrupt foundation undermines the market and political culture in the country to this day.

The second phase of NPM centred on the infamous land ownership reform program of the mid 1990s. Under the pressure from international financial institutions as well as emerging market forces within the country, the government went on a massive and hasty land privatisation process, which undermines the country's agricultural competitiveness even today. The land was distributed to peasants in relatively small plots (up to 0.75 hectares/7500 square meters), often scattered in several locations (Gorton, 2001:21; Lerman and Cimpoeș, 2006:453). Lacking resources and knowledge about modern agriculture techniques, and, even more importantly, failing to organising themselves into cooperatives and farmer associations, these small landowners could barely make ends meet, leading to much of their land staying uncultivated. Furthermore, just as with previous privatisation experience, mid and high level state officials capitalised on their information asymmetry and privatised large and fertile plots of agricultural land, creating large farms that replaced old soviet collective farms (Lerman and Cimpoeș, 2006:442).

The third stage, spanning from late 1990s to mid 2000s, could be described as the institutionalization of NPM, as numerous state agencies were created with specific goals and targets aimed at building an efficient public management system. The effort was normatively

underpinned by the PAT model, according to which, creating and empowering independent institutions would provide better public services via specialisation and detachment from political interference. Hence, the National Agency for Energy Regulation was created in 1997, Centre for Combating Economic Crimes and Corruption was founded in 2002, State Agency for Intellectual Property was established in 2004, while National Agency for Competition Protection emerged in 2007. Private sectors techniques slowly made their ways into state bureaucracy, introduced by executive managers who started moving into the top echelons of government. Yet, ironically, many of them came from state owned enterprises, including the longest serving Moldovan Prime Minister Vasile Tarlev (2001-2008), who had previously managed the state owned Confectionery Company “Bucuria.” Other prominent examples of businessmen turned prime ministers are Ion Sturza, who led the Cabinet from 19 February to 12 November 1999 and Chiril Gaburici (18 February 2015 – 22 June 2015). Unlike Tarlev, Sturza and Gaburici did not serve long enough to actually leave a mark in terms of major NPM reforms.

The fourth and current stage can be viewed as the deepening of NPM reforms across all sectors, in line with Moldova’s aspiration of joining the European Union. There is increasing emphasises on decentralization, transparency and accountability, while at the same time performance indicators are being introduced as part of the larger public sector reform process. The education system underwent a shock therapy under reform minded Minister Maia Sandu, a World Bank economist, who embarked on a highly unpopular, but necessary school optimization process, shutting down small underperforming schools to save costs and improve delivery of educational services. School directors became school managers appointed as a result of a public contest, contributing to a more competitive organisational culture, something that had only been discussed in local academic circles for years (Chicu, 2004:39). The reforms also tackled one of the major problems of the education system – corruption. However, corruption remains, indeed, a key issue for the entire public as well as private sectors in the country, undermining reform efforts, leaving Moldova in a catch-22. The country ranked 103rd out of 168 countries (Transparency International, 2012), and declined continuously to 123rd place in 2016 of 176 countries (Transparency International, 2016). It indicates a widespread problem with perception of public sector corruption, defined by Transparency International as abuse of power for private gain.

High levels of corruption perception relayed by international rankings are epitomised by several major political scandals that have rocked the country in the past five years, including the

most prominent – the so-called “billion-dollar scandal,” which “unveiled the frightening magnitude of Moldovan high-level corruption and state capture” (Tudoroiu, 2015:660). In light of turbulent geopolitical situation in the region, corruption is becoming a major concern for Moldova’s international partners. On his visit to Moldova, American Four Star General Philip Breedlove, then NATO’s Supreme Allied Commander Europe, stated that corruption is the biggest threat to Moldova’s national security (Deschide, 2016). It is all the more astounding that, in light of recent political developments in the country, namely mass public protests followed by a consolidation of power in the hands of the ruling party, there is little evidence to suggest that ruling political elites are willing to enforce meaningful anti-corruption measures, even if there is an ongoing process of pluralisation of policy making and a robust pressure for change coming from the public as well as the international community. The aftermath of the “billion-dollar scandal” is a vivid indication to that effect.

The Billion-Dollar Scandal

Throughout 2012-2014, three Moldovan banks: Banca de Economii [Savings Bank], Banca Sociala [Social Bank] and Unibank have issued loans to entities that never intended to pay the money back, as it later turned out, forcing the state to bail the banks out before withdrawing their licences in the wake of their bankruptcy, which would have otherwise led to a catastrophic contagion of the entire financial system of the country. The damage amounted to one billion US dollars, which is about 15% of Moldova’s annual GDP (Whewell, 2015; Eglitis, 2014; Eglitis 2016; Gosu, 2016). The government had to borrow money from the National (Central) Bank to pay for the bail out. Consequently, after two years of failing to bring the perpetrators to justice and failing to recover the money stolen, in September 2016, the government was forced to make the taxpayers liable for covering the financial losses and spread that burden over the next 25 years. The Ministry of Finance issues bonds to repay the debt to the National Bank, which made the stolen billion just an addition to the country’s public debt (Alaiba, 2017). The failure to enforce the law on the part of regulatory authority, mainly the National Bank and the National Financial Market Commission was manifest, as later indicated in an independent report by Kroll Inc. – an American corporate investigations and risk consulting firm commissioned by the National Bank to investigate the case (Kroll Report, 2015).

Ironically, it was a subsidiary of an American accounting giant Grant Thornton that carried out regular audits of the three embattled banks, issuing a series of positive opinions when

the banks were already going under (Rosca, 2015). To add insult to injury, the director of Grant Thornton's Moldova office, Stéphane Bridé, was soon after promoted to a high cabinet position – Minister of Economy, and by default Deputy Prime Minister. However, even if private stakeholders were negligent or complicit, it was state institutions that untimely failed to enforce the law and serve the public interest that they had been entrusted to protect.

Law enforcement, primarily the National Anti-Corruption Commission as well as the Office of the Prosecutor General have clearly failed to act, even though they had received all the information about the ongoing suspicious financial activity in the three banks, as confirmed by the heads of the abovementioned institutions during subsequent Parliamentary hearings (Infotag, 2015). A major criminal investigation is ongoing. The only individual convicted in connection with the crime is Former Prime Minister Vlad Filat. He was sentenced to nine years in prison on 27 June 2016 on charges of having benefitted from \$250 million from the missing billion. Yet, upon review by the Court of Appeals, only about \$25 million in illicit remuneration could be proven by the prosecution (Mosneag, 2016). Nonetheless, the higher court upheld the initial nine years prison sentence. Given that Vlad Filat was the leader of one of the ruling coalition parties, the trial was viewed as politically motivated selective justice at the hands of his main political rival Vlad Plahotniuc, particularly as no one else has been convicted, despite revelations from the Kroll investigative report, which only directly implicates the second most prominent figure in the case businessman Ilan Shor, who denounced Filat and on whose incriminatory statements the prosecution build the entire case against the former prime minister. Lack of a criminal investigation and prosecution for the inaction on the part of regulatory and law enforcement authorities also raised doubt over the impartiality of the judicial process.

The situation became increasingly suspicious as then 28 year old businessman Ilan Shor - the central figure in the criminal case and majority shareholder in the three troubled banks as well as chairman of the board of the largest of the three embattled banks, escaped prosecution by running for mayor of one of the largest towns in Moldova. This was only possible after he had entered an agreement with the prosecution, becoming the main witness against the ex-Prime Minister Vlad Filat (Infotag, 2015). However, Ilan Shor agreed to provide incriminatory depositions against Filat not just to save himself, but also to do the bidding of Filat's main political rival, leader of the Democratic Party, Vlad Plahotniuc. Filat and Plahotniuc have been fierce enemies despite being part of the same ruling coalition. The latter is considered to be the wealthiest person in the country, with immense influence over the ruling majority in parliament,

the country's government as well as state institutions that are supposed to be independent, such as the prosecution service, courts, Intelligence and Security Services, National Anti-Corruption Center, National Integrity Commission etc. (Infotag, 2015; Shupac, 2015; Socor, 2016; Gosu 2016). It has long been argued that independent anti-corruption institutions are a key mechanism in controlling and combating corruption. Singapore and Hong Kong are, perhaps, the most cited examples in the literature in this regard (Klitgaard, 1988; Quah 2007). A fundamental tenant of this literature stipulates that lack of institutional independence, when it comes to regulatory and law enforcement authorities, increases susceptibility to corruption and makes combating corruption more difficult. Hence, lack of agent independence constitutes one of the major causes of anti-corruption policy failure.

Practical Implications of Principal Agent Model in Anti-Corruption Policy

A decade into Moldova's independence, Professor Lucan Way presented a rather persuasive account of the country's democratic outlook as it muddled through transition. Yet, his assessment is being increasingly challenged by realities on the ground today. According to Way, "Moldova is best understood not as a struggling or unconsolidated democracy, but instead as a case of failed authoritarianism or 'pluralism by default' (2003: 454). This was indeed an accurate account of Moldova's condition at the time; however, the country appears to be moving towards a more centralised, less democratic and less pluralistic system, in which one prominent businessman is building a power vertical emulating the Russian and Central Asian models (Chirila, 2016).

It is all the more puzzling as this centralisation of power has been accompanied by a pluralisation of policy making, which has, indeed, preceded the anti-democratic drive. Moldova started off from a rather closed policy-making process environment after communism, and opened up gradually throughout the 1990's under the normative pressure from the overarching neo-liberal paradigm. Also, Moldova's development partners (donor countries and international organisations) have supported the growth of local civil society, which led to increased citizen participation and, therefore, a less hierarchical governing process. It indicated the beginning of a slow shift from a government type approach to one based on governance.

By the late 2000's, bureaucrats and politicians started partially renouncing their monopoly on policy making, as think-tanks and citizen groups became more prominent, resourceful and engaged. Policy decisions were slowly becoming less politicised and

increasingly based on evidence. Closer relations with and policy transfer from the European Union, including via twinning project and high level European advisers also contributed to a more open policy making process in the context of the country's aspirations of joining the European Union.

However, after Communists were defeated and a pro-European coalition took charge in 2009, the drive to democratisation, openness and genuine policy pluralisation was short lived (Popescu, 2012:37; Roman, 2014:65). The pro-European coalition parties soon succumbed to infighting and corruption, culminating in the infamous "billion dollars scandal." Initially, party competition, independent media and active civil society did prevent the interests of a single party or individual from dominating. However, the growing influence of one businessman turned politician – Vlad Plahotniuc, who only became a public figure in 2010 and quickly succeeded in eliminating his main rival ex-Prime Minister Vlad Filat from public life, ultimately led to increased concentration of power (Kostanyan, 2016). Plahotniuc managed to build a powerful media empire and a lenient expert community which, at this point, create the illusion of policy pluralisation, that, in turn, represents a legitimisation device for the public and the international donor community alike (Gogu, 2016).

The dualism in the civil society and expert community became manifest on the occasion of an Expert Forum on the implementation of the European Union – Moldova Association Agreement organised by pro-government NGOs in February 2017. It came to the point that the Head of the EU Delegation in Moldova had to leave the event after he had realized that some of the more authoritative experts initially advertised by the organisers were not included in the final program or were denied the floor (Barbroșie, 2017). Pro-government media then reported the event as a major success (Publika, 2017). A week later, several prominent NGOs had presented a more critical alternative report on the country's Association Agreement implementation (Realitatea, 2017). It was largely overlooked by pro-government media.

Hence, unfortunately, pluralisation of policy making only reinforces existing flaws of the local political and administrative systems, rather than mitigating them. The fact that one individual has so much influence that he can effectively serve as a gatekeeper of the pluralisation process, deciding which individuals and groups get access, ends up defeating the purpose of policy pluralisation. Lines of accountability are, therefore, blurred as actors (heads of state institutions) report to this informal centre of power, leading researchers to describe Moldova as a captured state (Tudoroiu, 2014; Calus, 2015). These lines of accountability are also shifting as an

agency is transferred from one principal to another (from Parliament to Government control, or vice versa), largely based on political expediency. Moldova is a leader in the post soviet space in terms of institutional innovation, having set up a Centre for Reform Implementation in January 2017. It is a government entity in charge of coordinating policy implementation akin to the Prime Minister's Delivery Unit in the United Kingdom, which is considered a success when it comes to shifting away from a personalist to institutionalist approach to governance (Richards and Smith, 2006). However, in the Moldovan context, policy implantation remains highly centralised and politicised as state institutions are autonomous in name only, which undermines their effectiveness.

The National Anti-Corruption Centre (CNA) is a case in point. It was established in 2002 under the name Centre for Combating Economic Crimes and Corruption (CCCEC). It has been reformed several times since then. Its prerogatives have been increased and then reduced often depending on political expediency at the time, but also in line with policy delivery specialisation aimed at effectiveness and avoidance of mega-structures. Currently, the institution's mandate only covers corruption, as the power to investigate economic crimes has been transferred to police and tax authorities. The institution is well funded, for Moldovan standards, and has received considerable technical and financial support from the European Union, in line with the 2011-2015 National Anti-Corruption Strategy approved by Parliament in light of Moldova's visa liberalisation agreement with the European Union.

In spite of that, one major problem that undermines all efforts for meaningful reform has not yet been addressed effectively. The current anti-corruption chief, Viorel Chetaru, is a controversial figure. He was appointed to lead the CNA in 2012 following a public contest. Yet, he first became director of the anti-corruption body in 2009, back then it was still the Centre for Combating Economic Crimes and Corruption. His father was a prominent local politician in the Democratic Party, which nominated Chetaru for the job in 2009, prompting media speculation about political control of the institution. Indeed, Chetaru himself acknowledged publicly that he had encountered political pressure while carrying out his duties (Unimedia, 2013), but he reassured the public that once he had been put in charge as a result of a public contest he would be able to better withstand that kind of pressure (Unimedia, 2015), despite the fact that his ties to the Democratic Party remain. Later scandals, including the billion dollar heist, prompted numerous accusation and even attempts to dismiss Chetaru, but he remains shielded by the

Democratic Party's faction in Parliament and cabinet, vindicating those who question his independence from the party and its leadership.

The problem with nominally independent state institutions being politically controlled is so pervasive that even the Parliament Speaker Andrian Candu, a leading member of the Democratic Party, stated in a TV appearance that, "When we talk about the Prosecution Office, about the Anti-Corruption Centre, Tax Authority or Customs Office etc. all of them encounter some sort of political influence" (Botnari, 2015). In theoretical terms, it means that the agent is not independent from the principal, which, on the one hand, does not allow the agent to act based on its legal provisions, but rather play in accordance to the way the strings are being pulled, while, on the other hand, it leads to 'blame games' (Hood, 2002) between the agent (anti-corruption body) and the principal (either Government or Parliament, deepening on the legal framework at any particular time). This is exactly what Moldova has been faced with.

CNA was initially put under Parliament control, but then moved under Government's oversight, only to now end up back under legislative scrutiny. In rationalist terms, principals are interested in minimizing costs related to policy implementation (corruption prevention, control) as well as policy failure costs, while agents are interested in their power maximization relying on information asymmetry (Groenendijk, 1997:227; Waterman and Meier, 1998:175). This leads to major concerns about 'agency costs' associated with avoiding 'agency drift', yet, ironically, political control over agents, as indicted in the case of Moldova, appears to be addressing these issues quite effectively, though not in the interest of the public. In the sense that the agents hardly ever go against the principal (corrupt political leadership), hence, there are minimal institutional 'agency costs'. This is, of course, at the expense of agent independence, and, as a result, at the cost of meaningful anti-corruption policy implementation that would otherwise inevitably infringe on the interests of some politicians. Hence, given that the interests of many influential politicians and those of the public do not align well when it comes to anti-corruption policy, lack of agent independence from potentially corrupt principals fails to serve the interest of the public, which is, in a normative sense, the ultimate principal in a democratic system, particularly when the country strives to achieve European Union democratic standards.

The problem is further exacerbated by the concentration of power within the executive branch, populated by proxies of the businessman turned politician Vlad Plahotniuc, who leads the ruling party, reinforcing power asymmetries, undermining political pluralism as well as the prospects of genuine policy pluralisation and anti-corruption efforts. Thus, Moldova's young and

weak democratic system, coupled with only a brief experience of coalition governments, is able to ensure and fulfil neither proper *ex ante* control mechanisms such as policy governing agreements and quality screening of potential coalition ministries, nor *ex post* mechanisms such as strong institutional checks and balances, including a prominent role for junior ministers. There is an extensive literature on the importance of junior ministers (Laver and Shepsle, 2000; Thies, 2001; Müller and Meyer, 2010; Lipsmeyer and Pierce, 2011), yet in the Moldovan case, after some junior ministers exercised their role of keeping their minister in check, some coalition leaders did not welcome the development and pushed for complete partisan control over ministries and other state institutions (Publika, 2013). This only exacerbated the original problem with the decision by the ruling coalition to politically distribute not just government portfolios as is the norm, but also politically distribute in a secret annex of the coalition agreement the legally independent agencies, including the anti-corruption and competition “watchdogs,” and even went beyond that to politicise the High Courts and the General Prosecutor’s office, this time in a gentlemen’s agreement (Flux, 2011; Publika, 2011). This clearly shows that, while agents may appear legally independent, the risk of actually having them under the informal control of a political party and even of an individual politician is very high in Moldova.

It is largely because of these negative tendencies that the European Union had to step out of its traditional role of benign observer and repeatedly issue stern warning to the Moldovan political class, including in the February 2016 Council conclusions on Moldova. The EU foreign ministers insisted that the government “prioritise reforms aimed at addressing the politicisation of state institutions, systemic corruption, public administration reform aimed inter alia at enhancing the effectiveness of regulatory bodies, transparency and accountability in the management of public finances as well as with regard to policy making” (Council Conclusion, February 2016). Similarly, the Council preconditioned the allocation of €100 million in proposed EU assistance, of which €60 million is preferential loans and €40 million is in the form of grants, on Moldova’s respect of effective democratic mechanisms, including a multi-party parliamentary system (Council, April 2017). Consequently, European Parliament decided to postpone the transfer of funds as European lawmakers raised concerns about the media situation, the rule of law, and proposed changes to the electoral system in Moldova (RFE/RL, 2017).

Finally, it is becoming apparent to Moldova’s development partners that one cannot blindly support this sort of reform implementation the country has been witnessing for the last few years. Under pressure from their own domestic constituencies, donor countries are coming to

the realization that their taxpayers' money needs to be spent more efficiently. However, under the paradigmatic principal agent model there seems to be no escape from the vicious circle of corruption and clientelism. Perhaps, one needs to move beyond the principal agent model and also look at collective action problems, which also play a crucial role in the failure of tackling endemic corruption, as is the case in other developing nations, particularly in Africa (Persson et al., 2010:21). Thus, it presents an important avenue for further research. Yet, for the purposes of this paper, the author will advocate that a stronger commitment device, which would be able to ensure more credibly the agent's independence from national political establishment by virtue of outsourcing national anti-corruption policy implantation to a foreign entity as per the Guatemalan example (Luhnow, 2015) or the well known European Union Rule of Law Mission in Kosovo (Radin, 2014). In fact, Moldova has benefited from an EU Border Assistance Mission (EUBAM) since 2005. Not only did the EU mission help better control the Moldovan - Ukrainian border on the Transnistrian segment by assisting with demarcation efforts and curbing smuggling, it also introduced European standards and best practices, including in the field of anti-corruption, which has contributed not only to better public services, but also to a better investment climate in the country and the region (Dias, 2013, p. 347). Therefore, this experience ought to be replicated at a larger scale.

Conclusions and Recommendations

New Public Management reforms implementation in the field of anti-corruption policy in Moldova, viewed through the prism of principal agent model, leads us to conclude that reforms were improperly implemented, leading to policy failure. Secondly, the ongoing policy pluralisation process, similarly to the NPM reforms, should have contributed to improvements in the quality of public services as well as having brought more legitimacy and transparency to the process, but the excessive concentration of power in the hands of one individual, who casts excessive influence over the country's political and economic institutions, has allowed him to use the policy pluralisation process to his own and his party's advantage via control over media, affiliated think tanks, commentators and analysts (RISE Moldova, 2015; Socor, 2016), thus defeating the purpose of policy pluralisation.

While acknowledging the NPM potential if implemented professionally and in good will, Moldova still needs to address the problem of lack of a strong and independent, apolitical, technocratic, Weberian type bureaucracy. Otherwise, if implemented in circumstances like

Moldova's, NPM as well as policy pluralisation can largely augment the existing weaknesses of the system. In the case of Moldova, increasingly described as regulatory/state capture, NPM reforms offer a legitimising brand name front, which can obfuscate the chronic problems of the country's political and administrative systems. However, even if new public management approach may not be perfectly suited for all environments, it still remain the only overarching paradigm without clear and feasible alternatives, particularly in places like Moldova, where it is simply the only game in town.

In light of Moldova's historical legacies, geographic location, level of economic development and extend of democratic tradition, it may not come as a surprise that the country is still muddling through transition faced with endemic corruption. However, given the relative success of fellow post-soviet countries from the Baltics or even, more so, the case of neighbouring Romania, a former member of the socialist block, indicate that a country can make a leap forward and successfully establish independent anti-corruption watchdogs that, in turn, can implement robust anti-corruption measures. It is well known that Romania just as the Baltic States were able to achieve better results largely due to EU conditionality and assistance in the pre and post accession phases. Lacking yet a clear membership perspective, Moldova can nonetheless rely on generous EU support in this regard.

Therefore, the more effective solution to Moldova's stringent corruption problem could come from closet policy approximation with the European Union. Ideally, Moldovan political leaders need to capitalise of socialisation and lesson learning opportunities offered by the EU, including, but not limited to capacity building and twinning projects in the field of anti-corruption policy making and delivery. However, if previous experience is any indication, only strong EU conditionality has any chances of getting the ball rolling. Unfortunately, Moldova is still far away from membership, even if there is talk about submitting an application in 2019 (Realitatea, 2016).

Yet, in light of recent corruption scandals and the meagre response from authorities, it seems that Moldova will have to do its homework first, before it can have any hope for EU membership, no matter how many policy failures that ensues. A more radical solution would be to outsource anti-corruption policy implementation to a UN or EU agency or special mission as in the case of Guatemala or Kosovo. This would better address the time inconsistency that policy makers and politicians face when promising independent institutions, only to renege on their promise when it affects their interests. A credible commitment in the form of an

international/European rule of law/anti-corruption mission would significantly boost the independence of local intuitions. However, as this can only be short to medium term solution, the ultimate goal is to socialise the local staff of these institutions with the European norms, rules and values so that, with time, they can carry on and ensure the independence of these institutions.

Yet, such an ambitious agenda makes it unlikely to materialise. A more feasible compromise would be to at least invite a team of experienced European anti-corruption experts to occupy the top leadership positions in Moldova's anti-Corruption and General Prosecutors' Office, something that has been part of the public debate for some time, but has failed to occur, given the reluctance of a part of the Moldovan political elite to give up their undue advantage.

Finally, given that a majority of Moldovans, including a significant part of the political elite, acknowledge that corruption is a major cause of economic, political and social problems in the country, but lack the credible political will at the national level to meaningfully address it, providing them with an instrument that can better insulate anti-corruption agencies from political influence, can become the compromise solution that offers the country a leap forward it so disparately needs.

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