



Working Paper 80

**Tax Unrest Among Market Traders :**  
The Local Side of ActionAid's International  
Tax Justice Campaign in Nigeria

Kas Sempere

May 2018

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ICTD Working Paper 80

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# Tax Unrest Among Market Traders – the Local Side of ActionAid’s International Tax Justice Campaign in Nigeria

Kas Sempere

## Summary

Tax justice has become a popular concept, and a number of international tax justice campaigns have exposed aspects such as the unfairness of tax havens and harmful tax breaks. Yet, the idea of tax justice at the local level is less well-known. The impact of campaigns to end tax havens and harmful tax competition may seem far from the lives and day-to-day tax struggles of many people living in poverty, including market traders in the informal sector. ActionAid, an international non-governmental organisation (NGO), managed, not without challenges, to integrate tax claims of market traders – such as multiple taxation – into its international tax justice campaign in Nigeria. Possibly more could have been done to include additional complaints from traders, such as those facing sudden and steep tax increases and tax harassment, and to support their actions – their visits and letters to the government, in addition to their tax strikes. Overall, however, ActionAid succeeded in linking their campaign at the local, national and international levels, retaining relevance at each of these levels by identifying different targets that could be influenced. ActionAid’s work is a positive example for other tax justice campaigns willing to give a stronger voice to market traders. Borrowing some concepts from social movement theory, this paper narrates the campaign’s journey, with a focus on how the market traders’ own tax challenges were integrated.

**Keywords:** tax activism; tax justice; campaigning; market traders; local marketplace; multiple taxation; social movement theory; Nigeria; ActionAid; international non-governmental organisations.

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## Acronyms

ActionAid	ActionAid International Federation
AAN	ActionAid Nigeria
AAUK	ActionAid UK
BIR-Ondo	Ondo State Board of Internal Revenue
FIRS	Nigeria's Federal Inland Revenue Service
IDS	Institute of Development Studies
JDPC	Justice Development and Peace Centre
NGO	Non-governmental organisation
TJC	Tax Justice Campaign (also known as Tax Power Campaign) <sup>1</sup>
UN	United Nations

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<sup>1</sup> ActionAid renamed the campaign as 'Tax Power' later on. At the time of fieldwork, AAN and AAUK were using TJC. To simplify, I use TJC for all the actors. See <[www.actionaid.org/tax-power](http://www.actionaid.org/tax-power)>.

# Introduction

I would note the usual things when I visited a local market in Nigeria to buy my daily goods: the strong smells as I walked past the stalls; the arrangement of tomatoes, yam, cloths and buckets piled up in pyramidal shapes; the battle of vendors' voices trying to scream loudest for their product; and the cleanliness of the place – or lack of it. As I started to visit markets to interview traders, I discovered structures that were more invisible to the visitor – the variety of plantain, gari, butcher and plastic product associations; the unspoken hierarchy of union leaders; the detailed and complex setting of prices, taxes and fees; the products that traders would be allowed to sell and the market spaces where they would be allowed to set up stall – with space stipulated to the centimetre.

As I gradually got familiar with this delicate order of the marketplace, I wondered how on earth my NGO campaign colleagues would integrate the tax struggles of market traders into an international campaign targeting tax havens and corporate tax advantages. Consider the next three vignettes as if you were the campaign manager in charge of putting this all together in a single, multi-country tax justice campaign for a large international NGO:

1. ActionAid UK offices in Farringdon, London. Staff at the NGO publish a report about tax havens – providing evidence of how Barclays Bank promotes their existence (ActionAid UK 2013).<sup>2</sup> The OECD estimates that low-income countries lose more funds to tax havens than the amount they receive in aid each year (OECD in ActionAid 2015), while ActionAid notes that almost half of all investment into these countries arrives through tax havens (ActionAid 2015). It is no surprise then that tax havens constitute a key activist demand for low-income countries – not only to expose the annual multi-million dollar financial resources lost by these countries, but also to show how this offshore system has long existed as the conventional way for businesses to operate (Palan 2009).
2. ActionAid Nigeria office in Gwarinpa, Abuja. A new research report states that Nigeria lost out on USD3.3 billion due to a ten-year tax break granted by the Nigerian government to three of the world's largest oil and gas companies – Shell, Total and ENI (ActionAid UK 2016).<sup>3</sup> ActionAid Nigeria's campaign manager further complained that: 'to track what corporate bodies are doing, the first thing is to look at the annual report, how much profits they made and tax they paid. But [when] you get to the Corporate Affairs Commission in the registers of the companies in Nigeria supposed to have those documents... there is nothing. Either the files are missing or the documents are not there. Sometimes they have never been filed. Sometimes someone has removed them'. It is no surprise that the Nigerian NGO takes up tax breaks as another key campaign claim.
3. In Akure, the capital of Ondo State in South-West Nigeria, market trader Amaka does not hear about the headline news published in the UK and Nigerian capitals.<sup>4</sup> Reports about Barclays or tax breaks do not mean much to her. She does not have a bank account and rarely enjoys the good fortune afforded by the custom of saving. In the local market where Amaka sells, the traders interviewed noted the various challenges to which they were subjected. These included: multiple taxation,<sup>5</sup> sudden and steep increases in tax, flat tax rates irrespective of what is earned, tax harassment and

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<sup>2</sup> Tax havens are jurisdictions with low or no taxation, often used by multinationals to reduce the tax paid in the countries where they work.

<sup>3</sup> Tax breaks are a type of tax incentive by which companies do not pay tax for a period.

<sup>4</sup> All names representing interviewees are fictitious.

<sup>5</sup> Multiple taxation refers to a situation in which a taxpayer is taxed more than once for the same activity or item due to a lack of tax collection harmonisation between national, state and local administrative tiers. See Section 3.3.

deficient public services. In response, ActionAid's partner association JDPC-Ondo published a video (2013) showing Akure's unequal market tax system.<sup>6</sup>

These vignettes in London, Abuja and Akure represent three ways of bringing to light the idea of tax justice, broadly understood as work concerned with pro-poor and redistributive tax systems. Today, tax justice has become a popular concept at international and national levels, and reports and campaigns have exposed the unfairness of tax havens and harmful tax breaks. Yet, the idea of tax justice at the local level is less well-known. For many people living in poverty around the world, including market traders in the informal sector,<sup>7</sup> the impact of any campaigning about tax havens or harmful tax competition seems far from their daily lives and tax struggles.

Some international NGOs have integrated the local level into their international tax campaigns by noting the benefits that tax collected from multinational corporations can have in financing public services. Yet, linkages between collecting tax and allocating it for public services are not straightforward, and there may be further challenges in relation to distribution, such as the politics of setting budgets, corruption and inefficiency. It still remains hard for people such as traders to see any relatively quick improvement in their lives.

While work on tax-for-public-services is an important step for integrating the local level into international tax justice campaigns, this paper presents another option – that of including the tax challenges that people in poverty are familiar with. In the case of market traders in Nigeria, these include – amongst others – multiple taxation, presumptive taxation challenges and tax harassment in the marketplace. Integrating the tax challenges raised by those most affected by poverty is key to mobilising them, while avoiding speaking on their behalf.

ActionAid, not without challenges, managed to integrate local trader struggles into its international tax justice campaign in Nigeria. This paper narrates this journey. While more could have possibly been done to position market traders at the centre of the campaign, ActionAid set a positive example for other tax justice campaigns by aiming to achieve more direct involvement from market traders and other large deprived groups, such as smallholder farmers.

This paper is divided into five sections. The literature review (Section 1) looks back at the history of tax activism and tax justice as a concept, and reviews initiatives involving local tax justice – including narratives on tax-for-public-services and market tax activism in Nigeria. Section 2 presents three social movement theory concepts – frames, repertoires and resonance – and uses these to explore the question 'how has ActionAid channelled tax unrest among market traders in its international tax justice campaign in Nigeria?' This section closes with a justification of the case study selected – ActionAid, JDPC-Ondo, Nigeria and market traders – and provides notes on the research process. Section 3 sets out the findings, and describes the tax claims and actions both in the campaign and amongst the traders outside it. Section 4 discusses how ActionAid managed to both integrate local market traders' demands and link them to other campaign levels. This is followed by the conclusions in Section 5.

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<sup>6</sup> Video (Ondo 2013): <<https://youtu.be/5GHgiJ2osTE>>.

<sup>7</sup> Market traders are those whose activity is inscribed in a market place, as compared to those selling in open-air locations such as sidewalks, parks, alleyways, and transport junctions and hubs (Vanek et al. 2012).



# 1 Literature review

Taxation has gained increasing importance within development studies, policy and praxis as a key area to strengthen development and governance. Comparatively, tax activism and tax justice are relatively unexplored areas of study. In particular, the area of local tax justice in relation to market traders and market taxation has been little studied. This review looks at these themes globally and in Nigeria.

## 1.1 The history of tax activism

Taxation and activism have long co-existed (Burg 2004). Taxes have created both supporters and resisters, in that as long as taxes have existed, people have protested either to keep them, change them or avoid them. Taxation has been present worldwide for at least 2500 years. Tax revolts are similarly enduring and widespread. David Burg dates evidence of tax protests back to the later Han dynasty (AD 25-AD 220) in Asia, the era of Hammurabi (1792-1750 BC) in Babylon [Iraq], and the Roman Empire (27 BC-AD 337) in Europe. Many major historic events, such as the Magna Carta and the American and French Revolutions, originated largely, Burg (2004) argues, from tax revolts.

Tax activism has included overt revolts and orderly civil disobedience, spanning different moments in the process of tax collection and distribution, and have been concerned with who gets taxed and who enjoys tax dividends (Esposito in Anderson and Herr 2007). Reasons for tax activism are varied, and include: a refusal to assign legitimacy for governments to tax citizens (Martin 2013); tax pacifism or a rejection of contributions to either military budgets and operations; wars conducted through taxation; and struggles against unequal distribution of wealth and attention to those groups insufficiently targeted by tax systems. This review focuses on the latter – inequality as a reason for tax activism.

## 1.2 The history of tax justice

Tax justice has become a popular subject in recent times<sup>8</sup> fed by events such as financial crises and tax haven scandals. For as long as tax structures have existed, people have fought for these to be responsive to the poorest in each town and country. More contemporary than taxation by nation states is the idea of international taxation and international tax activism, which includes action aimed at taxing global transactions and ending tax havens.

After the Bretton Woods system of monetary management ended in 1971, economist James Tobin suggested a currency transaction tax to slow down foreign exchange traffic. More than twenty-five years later, following the 1997 Asian financial crisis, the idea was revived when Ignacio Ramonet, the editor of *Le Monde Diplomatique*, created the Association for the Taxation of Financial Transactions for the Aid of Citizens (ATTAC) to promote the introduction of this tax. The tax rapidly became an issue supported by the global justice movement, and emerged as a discussion theme – not only in academic circles, but also on the streets and in parliaments. The initiative was revitalised in the UK by Oxfam and War on Want amongst others after the 2008 global financial crisis under the name of the ‘Robin Hood Tax’ campaign.<sup>9</sup>

Besides actions to tax global financial transactions, activists have also exposed more systemic issues about secrecy jurisdictions and illicit financial flows. Tax havens started in

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<sup>8</sup> See e.g. TJN (undated); Thorndike and Ventry (2002); Dodge (2004); Kohonen et al. (2011); Leaman (2013); Parsons (2011).

<sup>9</sup> <[https://waronwant.org/sites/default/files/robin\\_hood\\_tax\\_0.pdf](https://waronwant.org/sites/default/files/robin_hood_tax_0.pdf); <http://robinhoodtax.org.uk/bringrobinhome>>.

the nineteenth century (Hodges 2013; Palan 2009), yet the first scandals about them did not break until the 1970s after pioneering investigations (TJN undated). Set up in 1979, US Citizens for Tax Justice published its first report on financial statements of large corporations in 1984 (Pugh 2011). Launched in 2003, the Tax Justice Network (now Global Alliance for Tax Justice) received support from Kofi Annan, UN Secretary-General at the time, for its first major newspaper headlines on tax havens and world poverty (Campbell 2004). Other initiatives included the Financial Transparency Coalition and the Tax Haven Secrecy campaign.<sup>10</sup> Since 1997, the International Consortium of Investigative Journalists has released confidential data, such as the Panama and Paradise papers in 2016-17, which has kept tax havens in the headlines.

### 1.3 Towards local tax justice

In the broad sense, tax justice explores pro-poor and redistributive tax systems able to reduce income and social inequality. It involves a transparent process of pro-poor collection (those who have less, pay less) and pro-poor expenditure (those who have less, receive more), for instance, through public services (e.g. TJN 2012; War on Want and PCS 2013).

The international tax justice initiatives cited above often include a perspective on low-income countries. For instance, they suggest the use of international tax collection to finance development initiatives in low-income countries; expose the negative effects that tax havens have on the poorest; and value the role of low-income countries in global wealth-creation through corporate economic activity in their territories (e.g. Oxfam 2000).

However, notions of tax justice that listen to and mobilise those most affected by poverty are less common. How do the poorest define tax justice, and what struggles do they include under this banner? Studying how tax justice unfolds locally is important – both ethically, to avoid speaking about the poorest without involving them in tax campaigns, and operationally, since the lack of campaign relevance for traders and other key groups such as smallholder farmers misses an opportunity for mobilisation (see Section 2.3 for a justification of traders as a target group).

### 1.4 Local tax justice through ‘corporate-tax-for-public-services’

One way in which international NGOs such as ActionAid and Oxfam (Seery 2014) have integrated the local level into international campaigns is by exposing the narrative of corporate-tax-for-public-services. This refers to the potential benefits that tax collected from multinational corporations – as a result of ending tax avoidance<sup>11</sup> and tax breaks<sup>12</sup> – could have on financing local public services.

For instance, ActionAid reported that USD138 billion per annum is lost by poor countries due to corporate income tax breaks given to multinationals (ActionAid 2013). ActionAid suggests that this amount would be enough to send to primary school the 57 million children who currently do not go; provide the agricultural investment needed – USD42.7 billion – to achieve a world free from hunger; and meet international goals to reduce ill health more than twice over – USD58.9 billion (Burrows 2015; see Adams 2016 for a similar reasoning). Burrows (2015) adds to this example other calculations on tax-for-education globally and tax-for-public-services in Uganda.

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<sup>10</sup> <<https://financialtransparency.org/end-tax-haven-secrecy/>>.

<sup>11</sup> Tax avoidance refers to legal arrangements around and within companies in a multinational group purposefully created to reduce their tax payments (TJN-Africa and ActionAid 2012).

<sup>12</sup> Tax breaks refer to the tax relief granted to companies by national governments. This is often related to tax competition, the rivalry created amongst neighbouring countries to attract companies (TJN-Africa and ActionAid 2012).

Beyond these hypothetical calculations, little evidence exists to demonstrate how increases in tax may result in improved local public services. One study found that the more tax collected by African countries in relation to their GDP, the greater was their realisation of Millennium Development Goals in almost all cases (Waris and Kohonen 2011). However, this could be a correlation rather than a causation, as governments that organise better to collect tax may also organise better to achieve other goals (Burrows 2015). Moreover, the realisation of the Millennium Development Goals may not necessarily happen through the funding and improvement of public services.

All in all, linking tax collection and public service allocation as a campaign claim is a step forward towards naming the potential direct benefits for people living in poverty. However, while affordable public services are critical to the wellbeing and fulfilment of the rights of the poor, these tax-for-public-services links are far from straightforward – the eventual ripple effects arising from these collections and allocations may still encounter, further downstream, distributive challenges such as corruption and inefficiency.

## **1.5 Local tax justice through market taxation struggles in Nigeria**

Besides work on tax-for-public-services, international NGOs such as Christian Aid (Carroll 2011) and Oxfam Novib (2016) have developed projects and research related to markets, the informal sector and tax collection challenges. For instance, Civil Society Legislative Advocacy Centre, Oxfam's partner, organised meetings with informal sector workers. However, there is insufficient information to know whether and how these were integrated into international tax justice campaigns.

Beyond work developed by international NGOs, market activism on taxes has a long history in Nigeria. Women's leadership in particular is well documented. In 1929, thousands of eastern Nigeria women protested against female direct taxation as part of colonial indirect rule. Market squares became the women's meeting – and self-funding – places for what is known as the Igbo Women's War or Aba Women's Riots (Van Allen 1975; Andrade 2002; Byfield 2003). The protests lasted almost three months and occurred in several provinces, most intensely along important market routes dominated by itinerant women traders (Byfield 2003). Revolts eventually forced a change in the system of indirect rule of the eastern region, but during this fifty-five women lost their lives (UNESCO 2015).

Protests against market taxes continued from the 1920s to the 1950s. Colonial policies in the 1920s, such as external price controls and direct taxation, triggered the creation of the Lagos Market Women's Association, led by Madam Alimotu Pelewura. The Association sought an end to female taxation, the right to vote and keep their traditional role in deciding market locations, commodity pricing, and control of fees charged for market maintenance (Smith 2005). In the 1930s and 1940s, associated women had some success in overturning colonial laws, such as the separate income tax on Lagosian women (UNESCO 2015).

In 1941-47, Egba women staged several acts of civil disobedience and demonstrations against colonial authorities, taxation, market closures and commodity delays (Byfield 2003). Gender-differentiated tax laws were introduced in Abeokuta in 1918. If women failed or refused to pay tax, they were often harassed, arrested or even stripped, and their houses examined (UNESCO 2015). With an estimate of 20,000 members, the Abeokuta Union (later renamed Nigerian Women's Union) asked to end any taxation without democratic representation (UNESCO 2015). Under the leadership of Madam Funmilayo Ransome-Kuti, a succession of marches against the authorities led to the suspension of female direct taxation in 1948 (Smith 2005; UNESCO 2015).

Market traders' unrest and protests to tax authorities continue in Nigeria today – a topic we return to in Sections 3.3 and 3.5.

## 2 Concepts and methodology

This section explains the choice of social movement theory to understand unrest and activism, and of ActionAid, Nigeria and JDPC-Ondo as case study sites. It then justifies why market traders were studied as a key population for tax issues, and concludes with notes on the research process – including research limitations, timeframe, sampling, data collection and analysis, and ethics.

### 2.1 Why social movement theory

Why are social movement concepts useful for studying a tax justice campaign? Social movement theory is one of the oldest and most exhaustive bodies of theory to study protest (della Porta and Diani 2006). While originally designed to study social movements, social movement theory can be used as a general theory of collective action and thus extrapolated to study other actors that campaign, such as political parties, interest groups and voluntary organisations (della Porta and Diani 2006; Tarrow 2011).

One way in which social movement scholars have studied activism is through frame and repertoire theory, which looks at the claims and actions used in political activity. ‘Frames’ are the set of beliefs and meanings that inspire action (Benford and Snow 2000; Snow et al. 1986; Snow 2013). ‘Repertoires’ are the set of protest actions that a group can use to make claims, such as a march or a strike (Tarrow 2011; Tilly 2006). Frames and repertoires gain strength when they succeed in appealing to activists, public supporters and opponents. For instance, opponents may respond with their own counter-frames and counter-repertoires.

The idea of ‘resonance’, or the possibility that frames will catch on, can help explore which claims succeeded as part of ActionAid’s campaign (Benford and Snow 2000; Noakes and Johnston 2005; della Porta and Diani 2006). Resonance is key for activist effectiveness (Benford and Snow 2000). To be resonant, a frame has to be credible, culturally appropriate, and relevant, or able to read the audience’s priorities. While cultural appropriateness focuses on the broader cultural context, relevance relates to the daily experiences and needs of an audience (Noakes and Johnston 2005).

Overall, these concepts should help us respond to the question: how has ActionAid channelled tax unrest among market traders in its international tax justice campaign in Nigeria? More concretely: how were tax claims from traders integrated into the campaign?; how were tax actions from traders integrated into the campaign?; and how were local demands linked to national and international campaign issues? The first two questions are explored in Section 3, and the last question is addressed in Section 4.

### 2.2 Why ActionAid, JDPC-Ondo and Nigeria

An ‘extreme’ case study reveals: ‘information on unusual cases, which can be especially problematic or especially good ... to understand the limits of existing theories and to develop new concepts’ (Flyvbjerg 2011). I selected ActionAid, ActionAid Nigeria, JDPC-Ondo and Nigeria as I felt that they represented an especially good case study. ActionAid was important for its strong activist and decentralised reputation; ActionAid Nigeria and JDPC-Ondo presented solid tax work; and Nigeria presented a case of a highly unequal country.

ActionAid, an international NGO working on poverty and injustice in forty-five countries,<sup>13</sup> has gained a reputation among peer organisations and academia<sup>14</sup> for its activist identity<sup>15</sup> and decentralised decision-making structures. Founded in 1972 to undertake child sponsorship and provision of services, the NGO transitioned into a more political organisation, setting an explicit global strategy to become a campaigning organisation in the 2010s. ActionAid followed NGO trends towards decentralisation at the time. Yet, what distinguished the NGO was the radical way in which this was applied (Newman 2011). For instance, the headquarters were split from ActionAid's country founder, ActionAid UK (AAUK), and moved to South Africa in 2003. AAUK then became one more voting country member (Jayawickrama and Ebrahim 2013).

These factors gave ActionAid the conditions to create bold, dispersed global campaigns with a strong local mobilisation component compared to other NGOs. While Christian Aid and Oxfam were also campaigning on tax justice in Nigeria at the time of the research, they had not placed campaigning in as central a role in their global strategies as ActionAid, nor detailed its (local) operative components.<sup>16</sup> Thus, ActionAid can be taken as an extreme case to explore the full potential role of the local level in an international campaign.



**Figure 1 Location of Abuja and Akure (Ondo)**

Source: United Nations.

Within the Federation, ActionAid Nigeria (hereafter AAN) was one of the strongest country members in tax work. For similar reasons AAN staff and I then chose Justice Development and Peace Centre in Ondo state (JDPC-Ondo; see Figure 1), as it was the most advanced AAN partner in tax work at the time. The security and logistical conditions were also the best due to the fact that I had the chance to stay in a safe and economical Catholic nuns' hostel in Ondo's capital Akure. A strong network of youth campaigners existed that I could work with as research assistants. JDPC-Ondo was chosen after visiting AAN partners in four states (FCT, Kaduna, Kogi and Ondo), and interviewing partner staff from two other states (Benue and Delta).

Tax justice in Nigeria is especially relevant, since inequality in the country is high and increasing. This is despite an abundance of natural resources and rapid growth, which has averaged around 7 per cent per year since 2000 (The Economist 2014). The middle (median) earner receives USD1.80 a day, which is below the international poverty line of USD1.90 a day (Murray 2016). In countries with a similar GDP per capita, the middle earner gets more per day, for example, around USD7 in Tonga and USD9 in Bolivia (Murray 2016). Oxfam and Development Finance International consider Nigeria as the country that commits least to reducing inequality (Lawson and Martin 2017; McIntyre 2017; Oxfam 2017). Their global index puts Nigeria last in a list of 152 countries as measured by the dimensions of tax, spending and labour.<sup>17</sup> According to the World Bank, Nigeria's tax/GDP ratio is one of the lowest in the world – 1.48 per cent in 2013.<sup>18</sup>

<sup>13</sup> <[www.actionaid.org/who-we-are](http://www.actionaid.org/who-we-are)>; a full historical account can be found in Newman (2011: ch.4)

<sup>14</sup> This was mostly by Harvard and IDS-Sussex universities (Sempere 2016).

<sup>15</sup> Universities such as Harvard and IDS-Sussex have studied ActionAid's radical and innovative nature in a number of publications (Sempere 2016). Some consider ActionAid 'arguably the most radical large INGO' (Newman 2011: 102).

<sup>16</sup> <[www.christianaid.org.uk/resources/about-us/partnership-change](http://www.christianaid.org.uk/resources/about-us/partnership-change) and <http://oxf.am/ZPbh>>.

<sup>17</sup> <[www.inequalityindex.com/](http://www.inequalityindex.com/)>.

<sup>18</sup> <<https://data.worldbank.org/indicator/GC.TAX.TOTL.GD.ZS?locations=NG&view=chart>>; also see <[www.wider.unu.edu/project/government-revenue-dataset](http://www.wider.unu.edu/project/government-revenue-dataset)>.

## 2.3 Why market traders

Market traders and market taxation is central to tax justice for at least two reasons – because of traders’ weight in the economy, and because of the relevance that tax has for their livelihoods.

The informal sector is paramount for most countries, including advanced economies (IMF 2017). The informal economy in sub-Saharan Africa is the second largest in the world, accounting for 38 per cent of GDP in the region from 2010 to 2014. The Nigerian informal sector stands out as one of the largest – at 50 to 65 per cent of GDP (IMF 2017). The Nigerian National Bureau of Statistics (2010) counted 54.6 million informal sector workers in 2009. Moreover, the wholesale and retail trade sector – which includes market traders – is the second largest sector (with 24.9 per cent of all workers), only exceeded in scale by the agriculture, forestry and farming sector.

Market taxes and payments are equally relevant. They are constantly present in traders’ daily lives. For a trader, a rise in market taxes can mean the difference between self-sufficiency and dependence, between food and hunger. The market tax protests in Nigeria’s history, as described above, are testimony to this.

While the focus on market traders is important, they only represent one type of local tax activism. For example, smallholder farmers are another large and economically relevant group whose tax demands and activism do not seem to have been much studied. An AAN campaign manager noted in his feedback (2016) that multiple taxation work from AAN has gradually included farmers besides traders, with smallholder farmer women having become stronger as part of Nigeria’s Tax Justice and Governance Platform.

## 2.4 The research process

The PhD fieldwork took place in Abuja, Akure and London between January 2013 and December 2014. Data was collected through qualitative methods and included participant observation in campaign activities, a review of archives and old internal reports, key informant interviews (lasting at least an hour), group discussions, and shorter semi-structured interviews with traders (lasting at least fifteen to twenty minutes). Forty-seven key informants were interviewed from organisations involved in the campaign. This included seven with ActionAid International Secretariat,<sup>19</sup> nine with AAN, four with AAUK, three with JDPC-Ondo, five with other TJN-Nigeria partners, three with international partners, four with Nigerian campaigners and seven with UK campaigners. Four group discussions were held with Activistas,<sup>20</sup> and two with AAN and JDPC staff. Data from actors external to the campaign was obtained through documentation, participation in workshops with national tax and investment authorities and donors, as well as a few key informant interviews (two from state tax authorities and three from academia).

Data relating to market traders included a review of work by AAN and JDPC-Ondo and primary data collection in the states of FCT, Kaduna and Ondo. This comprised semi-structured interviews with traders in the markets and during workshops. The traders present in workshops related to AAN and partners, while those visited in markets did not. Informal chats were also held with traders during several visits organised for women’s rights activities in Gobue and Kuje (FCT). At least fifty traders were interviewed by myself and research colleagues (see Figure 2), and five visits were made to markets – Akure’s Isikan main market

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<sup>19</sup> TJC-related international secretariat teams include the tax power campaign team, the advocacy team and the mobilisation team on digital campaigning.

<sup>20</sup> Activistas are youth campaigners supporting ActionAid.

(visited twice), an open-air market in the outskirts of Akure, Kaduna's main market, and Gwagwalada market in FCT (which was undertaken by youth campaigners only).<sup>21</sup>

**Figure 2 Interviews in the markets, Akure, Ondo State**



Source: Kas Sempere

Data for this paper was collected as part of my PhD fieldwork about political action in ActionAid's Tax Justice Campaign in Nigeria and the UK (Sempere 2016). Therefore, the emphasis was on campaigning, while tax justice just happened to be ActionAid's most advanced global campaign at the time. I, however, collected sufficient data on tax, and thought that activist theory could offer an interesting perspective to explore this material. A specific study on gender, taxation and market traders in Nigeria is forthcoming in the ICTD series (Akpan and Sempere forthcoming).

I used the open-access software programme Sonal for coding and analysis. Sonal facilitated the organisation of data by audio themes and by full transcription. I used the faster audio option to arrange all interviews by themes and the slower transcription option for quotable interviews. I/we asked for consent to collect, record and use data and ensured the confidentiality of all traders. Some key informants were happy to be named. I shared results with ActionAid and partners, and integrated their feedback into the final findings – see methodology in Sempere (2016) for more details.

## 3 Findings

Consideration of the issue of tax began in ActionAid around 2005. Three years later, the Tax Justice Campaign (TJC) saw an opportunity to expand internationally and in Nigeria. This section looks at the claims and actions that took place during the campaign, as well as the claims and actions of market traders inside and outside it.

### 3.1 From aid to tax claims – thinking of a Tax Justice Campaign in ActionAid (2005-2007)

Tax justice became a campaign theme in ActionAid as a result of initial pushes and support from some African and Asian ActionAid members and ActionAid UK. These tax advocates navigated through times of internal division and resistance in the NGO, before entering a period in which a new context eventually facilitated the campaign launch.

The first internal discussions about tax among ActionAid member organisations started in 2005. An AAUK ex-staff member, involved in the process at the time, pointed to internal reasons as the main push to take up tax issues: 'the idea to go with tax was one that really came from the South [sic] to a certain extent and then it was really taken forward by the North [sic] ... there were some very progressive voices in the organisation from Africa and Asia saying ... we don't want to be working on aid any more ... on making aid more effective, more honest' (interview, 2013).

<sup>21</sup> Video (Abuja 2013): <[www.youtube.com/watch?v=WZkyAivUPxl](http://www.youtube.com/watch?v=WZkyAivUPxl)>.

One reason for discontent was the limited advocacy capacity of the aid narrative. An AAUK ex-staff member reflected: 'at times you were wondering ... why aren't countries in the South picking it [aid] up ... the reason is that they wanted to hold their countries accountable, not the UK government accountable. That was AAUK's job, not their job' (interview, 2013). Contrarily, tax justice was seen as a better way for African and Asian staff to be able to hold their governments to account: 'there is a lot of [political] support for this tax campaign in a way that there wasn't for aid or for debt ... from Country Directors in the South because they really see this as something they can hold their government to ... while they were always sort of inbetween, sort of sitting on the fence when it came to aid or debt' (interview, 2013).

The move from aid to tax shrank the space for governments to blame other international actors. The interviewee noted: 'the IMF would always say to us, "oh well it's not us, it's the government", and then the government would say to us "it's not us, it's the IMF". At least with tax, when it comes to tax holidays, harmful tax incentives, it's no-one else but the government ... who signs these contracts. And the World Bank is not mentioned in these [tax] contracts so in many respects there is a lot more that you can [do] ... there aren't as many players' (interview, 2013). One could say that governments did not have power (or did not want) to challenge multinational corporations. Yet, that still begs the question why that power was absent (or not used), and what could be done regionally or globally. The ball continued to fall with governments to organise, and that was another reason why African and Asian country staff liked tax as an issue (interview, 2013).

Besides these strategic advantages, some African and Asian country directors were morally uncomfortable with supporting aid campaigns that paradoxically paralysed their governments' autonomy. Their push for tax issues also responded to a will for financial sufficiency. A report later clarified: 'our staff and partners in developing countries ... believe that developing countries should themselves be able to finance more of the services that are essential to tackling poverty, through tax revenue' (ActionAid UK 2009: 2).

Meanwhile, aid-centred activism was causing some internal divisions. Staff from Italy and the UK were conscious of the counter-arguments, yet defended the importance of aid claims to keep holding European governments accountable (Newman 2010; AA senior staff member, feedback, 2016). Other staff agreed to see the aid approach as an opportunity, but only as a method suitable for European staff vis-à-vis their governments, not for others in the ActionAid Federation (Newman 2010). The European-driven management of aid advocacy was also seen as reinforcing 'North-South' power relations in ActionAid, while aid was considered a distraction from the real challenges of development financing (Newman 2010). By 2010, an internal report distanced the NGO from aid by stating the need to move from a past focussed on aid, and a present centred on development financing (including tax justice), to a future of global redistribution (Hall in Newman 2010).

The oldest country member and main financial bastion in the Federation, AAUK, welcomed the idea of tax. The UK development sector was experiencing some fatigue at the time with previous financing development campaigns like debt and trade. AAUK also needed a campaign angle that would enable them to question the responsibility for a UK target on development problems in low-income countries – be it a UK multinational or the UK government. That angle existed for tax – to expose the poverty effects arising in African and Asian countries from the alleged tax avoidance by UK corporations (AAUK ex-staff member, interview, 2013). Moreover, the UK was responsible for a large percentage of tax havens, which constituted territories where taxes were low or zero to non-residents, and were also secretive (AA senior staff member, feedback, 2016).

Despite these advances in the tax agenda, the road towards tax campaigning was not without internal resistance. The UK's role in tax havens created a constant tension with the department of fundraising in AAUK. Small but affluent ActionAid groups in Guernsey and



Jersey, themselves tax haven territories with the complicity of the UK government, withdrew funding when they heard of the campaign. The gesture raised some concern about how far such withdrawals would stretch, fearing a donor domino effect (AAUK ex-staff member, interview, 2013). Some considered the government, too, might join a potential funding withdrawal (AA senior staff member, feedback, 2016).

The effect only materialised with a few donors, and many in ActionAid deemed the fear of donor withdrawal in AAUK's fundraising department and among some country members to be misplaced (AA senior staff member, feedback, 2016). Discussions on the likely loss of funding eventually led to ethical debates about the organisation's financial sources (AAUK ex-staff member, interview, 2013). For instance, many major donors who were potential ActionAid donors kept their money in trust funds and family savings plans in tax havens. These were part of the unjust tax system that ActionAid was aiming to criticise with its campaign (AAUK ex-staff member, interview, 2013).

Externally, ActionAid's first campaign steps coincided with a rise of tax justice civil activity. Started in 2003, the Tax Justice Network (TJN) brought together senior and retired bankers who wanted to change the global financial system in which they had previously worked (AAUK ex-staff member, interview, 2013). The TJN envisaged itself as an NGO despite its professional origins, and wanted to play a part alongside other NGOs (AA senior staff member, feedback, 2016). Despite its extensive inside knowledge, the TJN had few linkages with African and Asian organisations at that time. This is what NGOs like Christian Aid (and later ActionAid) were in a position to offer – access to partners and financial support, combined with the policy space built from past work on economic justice issues such as debt, trade and aid (AA senior staff member, feedback, 2016; AAUK ex-staff member, interview, 2013). TJN-Africa was founded in 2007.

NGOs like Christian Aid and Norwegian Church Aid had worked together on tax for some years. The thinking on tax opened up with work done by Charles Abugre and Sony Kapoor at Christian Aid – which they referred to as 'plugging the leaks' – as well as John Christensen's initiatives at the TJN (AA senior staff member, feedback, 2016). In 2008, Christian Aid and the Norwegian Church Aid published a cutting-edge report on the effects of the international tax system in Tanzania, and the elusive roles of gold mining multinationals and the Tanzanian state (Curtis and Lissu 2008). Christian Aid not only had data and experience, but also strong technical capital. One of its staff, a former academic, proved crucial for data credibility at that point: 'Christian Aid came up with this figure ... Alex Cobham ... knew how to take these calculations from his ... technical background that none of us at ActionAid had' (AAUK ex-staff member, interview, 2013).

The UN Doha Conference on Financing for Development held in Qatar in 2008 (a follow-up to the Monterrey Consensus on Financing for Development held in Mexico in 2002) gave a push to the growing coalition of international development actors interested in tax: 'that was an opportunity for all of us to kind of meet in person, and it's through those connections that we consolidated a group of international actors ... it [tax] was very new, and I think we sort of needed each other' (AAUK ex-staff member, interview, 2013).

At least two other external factors propelled the emergence of tax as a campaign issue – a saturation of previous campaigns on development finance in ActionAid and other NGOs, and the advent of the global financial crisis.

Economic justice topics, such as the role in the UK of both governments and banks in aid, trade and debt, had been active in some NGO campaigning in the UK since the end of the 1970s (Luetchford and Burns 2003). Live Aid became the first large-scale campaign in the 1980s, followed by Jubilee 2000 on debt cancellation in the 1990s, and Make Poverty History on aid, debt and trade in the mid-2000s (Yanacopulos 2016). After that, a certain saturation

with previous campaigns opened the space for a new theme to fill the gap: 'before, that space was completely saturated with trade, debt and IMF conditionality ... and those campaigns kind of came to an end, almost maybe to a natural end' (AAUK ex-staff member, interview, 2013).

In a way, this natural end referred to the different active and passive cycles of a campaign: 'debt reached a stopping point for many with the 2005 Gleneagles G8 meeting; after the 2005 Hong Kong Ministerial [WTO's 6<sup>th</sup> Ministerial Conference], most people decided the WTO was nicely stalemated (true until quite recently [2016]); and with the IMF, we'd gotten concessions on conditions, and there was movement (although not swift) in a positive direction after the financial crisis and Strauss-Kahn became managing director' (AA senior staff member, feedback, 2016).

ActionAid staff read the situation as an opportunity: 'there was a feeling of "I don't want to do IMF conditionality anymore, it doesn't necessarily take us anywhere", and debt had already been done and trade negotiations were on hold ... [tax] seemed like the logical place to go. And then because there was this request from the South[ern country members] ... things aligned in a certain way' (AAUK ex-staff member, interview, 2013).

In 2008, the global financial crisis hit and opportunistically lined up with ActionAid's internal tax moves, the emerging tax justice international coalition, and the sector's saturation with other campaigns: 'I was in the office in August the day that Lehman Brothers went bankrupt ... we all just sort of looked at each other and thought ... "this is it, this is the perfect time for the tax campaign"' (AAUK ex-staff member, interview, 2013). The financial crisis and the need to find liquid revenue positioned taxation as a topical campaign focus. Moreover, the tax narrative was inherently powerful, as calculations showed that a reformed international tax system would be able to collect much more than the amount ever achievable through aid or trade means (AAUK ex-staff member, interview, 2013). At the end of an agitated period, favourable factors offset the internal funding concerns against tax issues in ActionAid. The TJC was ready to start, and AAUK took the lead within the ActionAid Federation.

Two conclusions can be drawn from reading this first thinking-about-tax period between 2005 and 2007 in ActionAid. First, this was a period of changing major frames of activist work – away from aid, debt and trade, and towards taxation. This transition did not bring a full frame transformation, but was rather cumulative. In practice, aid claims have not been replaced by tax claims, but remained and co-existed with them. This may have been a response to financial and communication reasons. Financially, aid claims ensured that aid funding was preserved to sustain the very financial mobilising structures that permitted tax work. As for communication, old aid claims helped introduce new ones such as tax, and helped them resonate with activist audiences unaware of the topic – for instance, AAUK noted that developing countries lost three times more to tax havens than they received in aid each year.<sup>22</sup> Finally, there was probably a tension between gaining new supporters for tax, without losing those already mobilised by and/or only concerned about aid.

The second conclusion is that the frame of tax justice was still treated as a unitary claim in ActionAid during this period – a sort of gift box that was not yet ready to be opened, but just exposed and reclaimed. The diversification of tax justice meanings, with the internal tensions attached to them, was to come later. We now turn to explore that period.

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<sup>22</sup> <[www.actionaid.org.uk/latest-news/investment-into-developing-countries-via-tax-havens](http://www.actionaid.org.uk/latest-news/investment-into-developing-countries-via-tax-havens)>.

### 3.2 Tax corporate claims – the first steps of the Tax Justice Campaign (2008-2011)

AAUK led initial activities of the Tax Justice Campaign with a perspective focusing on tax avoidance by corporations. This approach led to tension during the initial stages in several country members of the ActionAid International Federation. Tension continued during the planning period, when the campaign was scaled up at Federation level.

AAUK was the first country member in the ActionAid International Federation to work on tax. During these initial steps, tax justice was introduced as exposing corporate tax avoidance, understood as the legal arrangements around and within companies in a multinational group purposefully created to reduce their tax payments. For instance, the first research piece on tax focused on tax avoidance and was published in 2008.<sup>23</sup> Public campaigning followed soon after, with campaign case studies exposing how the tax procedures of a UK company or bank affected tax collection in an African or Asian country.

Tax avoidance has stayed as an ongoing line of research and campaign work for AAUK. The first AAUK public tax campaign reported the tax operations of South African beer brewing multinational SABMiller in countries like Ghana, India and Mozambique (2010). Following this AAUK targeted the Anglo-Swiss trading and mining multinational Glencore (2011), Zambia Sugar, which is part of the multinational Associated British Foods (2013), Barclays Bank's tax policies in Africa (2013-14), Paladin, the Australian mining company in Malawi (2015), and several oil and gas companies in Nigeria (2016).

At the time AAUK started campaigning, other country members like Bangladesh also showed interest in taking up tax issues, but they did not have enough staff availability: '[they] didn't have the time in their work plans ... [to get] the campaign going ... disparity [existed] between AAUK having three [full-time] people working on it [tax] and countries having a quarter of the person's time' (AAUK ex-staff member, interview, 2013). As a result, AAUK staff would travel to the African or Asian country to research the case study and cover for the lack of national staff available (AAUK ex-staff member, interview, 2013).

The disparity between AAUK staff availability and that of other country members, as well as AAUK campaign expertise, meant that the initial campaigns were driven by AAUK's corporate perspective. AAUK campaigns would operate through bilateral agreements with other African or Asian country members, and consecutive one-year in-depth case studies would take place targeting single corporations or banks. This was initially welcomed by other country members: 'the campaign started being heavily driven from an MNC [multinational corporation] angle, and I don't think that posed any challenges for [ActionAid] countries' (AAUK ex-staff member, interview, 2013).

However, the international corporate tax avoidance angle soon faced practical challenges, and the need to take it to the national level became apparent by 2009-10. Most African and Asian national governments did not have the resources to manage that complex topic and had other priorities: 'we also needed to say something about African countries particularly, but also South Asian countries' lack of capacity to monitor taxation and MNCs [multinational corporations] and do anything about transfer pricing<sup>24</sup>... we then tried to have a bit more focus on the policy demands around building the capacity of African ... or Southern revenue tax authorities to be able to track situations of transfer pricing' (AAUK ex-staff member, interview, 2013).

<sup>23</sup> <[www.actionaid.org.uk/policy-and-research/research-and-publications/tax-justice?keys=&page=3](http://www.actionaid.org.uk/policy-and-research/research-and-publications/tax-justice?keys=&page=3)>.

<sup>24</sup> Transfer pricing happens whenever two companies that are part of the same multinational group trade with each other. Transfer mispricing happens when transfer pricing is manipulated or abusive, and is related to tax avoidance. <[www.taxjustice.net/topics/corporate-tax/transfer-pricing/](http://www.taxjustice.net/topics/corporate-tax/transfer-pricing/)>.

For AAUK to maintain its corporate narrative while keeping other ActionAid country Federation members and their national administrations interested, it was necessary to tackle the tax avoidance discourse at a national level and advocate for a stronger governmental role against tax avoidance. The adapted claim gradually gained strength: 'it is a strand of work that is getting stronger and stronger now [2013], so we've been engaging at the African Union level on tax and with African tax revenue officials' (AAUK ex-staff member, interview, 2013).

In addition to this adaptation of tax avoidance from a focus on governmental capacity and resources, the claim of harmful tax incentives gained popularity between ActionAid staff during the first bilateral campaigns in 2010-11. Tax incentives were understood in the campaign as tax privileges granted by governments to multinationals in order, allegedly, to attract their investment. ActionAid denounced many of these incentives, since they created a perverse competition between countries to gain investment.

Thus after a few years of campaigning, the notion of tax justice broadened beyond the initial tax avoidance framing used by ActionAid. As compared to tax incentives, tax avoidance<sup>25</sup> claims had international or supranational targets, which were mostly multinationals, and, secondarily the G20, OECD, UN and governments. Instead, the tax incentive<sup>26</sup> claims mostly targeted those national governments offering harmful tax incentives, and then, secondarily, supranational bodies like the African Union that had the power to challenge the tax competition created regionally as a result of tax incentives.

These two tax justice claims existed in tension in ActionAid and in the sector. On the one hand, many African and Asian country staff preferred to work on tax incentives: 'African and Asian governments are powerless against transfer pricing [tax avoidance] regulation. Those rules are all decided in international forums that they are not a part of. So it was not at all empowering to governments to say "stop transfer pricing" ... what was in their control were the tax incentives, and a lot of the Southern colleagues were saying that's what they want to work on' (AAUK ex-staff member, interview, 2013). In 2010, TJN-Africa sponsored a meeting to agree on a campaign frame able to both respond to international interest on tax policy and mobilise people in Africa. As a result, the majority of actors present in the meeting, including ActionAid, agreed on selecting tax incentives. Further research work on tax incentives was then undertaken by ActionAid and TJN-Africa in five Eastern African countries in 2011-2013 (AA senior staff member, feedback, 2016).

On the other hand, the UK government had no role in relation to tax incentives granted by third party countries. Thus, for AAUK tax avoidance presented the only claim with a UK campaign angle. Additionally, the global crisis was too much of an opening to be allowed to pass unchallenged with regards to tax avoidance (AAUK ex-staff member, interview, 2013).

While the first bilateral tax avoidance campaigns led by AAUK continued, discussions started in ActionAid to scale up the campaign to other members in the Federation. A working group was formed to draft a campaign proposal as an input to the 2012-17 new global Federation strategy. While the first bilateral campaigns had raised discussions about tax avoidance and tax incentive options, debates in this group turned around the role of local level participation.

This interest was partly a response to the goal in the Federation strategy of reaching 5 million supporters and 5 million young people (ActionAid 2012): 'there was a need [in the ActionAid Federation] which maybe wasn't so pressing when AAUK was leading the campaign, which was now to connect it to the local ... the [Federation's] strategy ha[d] very ambitious targets

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<sup>25</sup> Also known as tax dodging – this includes tax havens, transfer pricing and double taxation treaties.

<sup>26</sup> Also known as tax breaks – this includes tax holidays, a type of tax incentive by which companies do not pay tax for a period, and the tax competition that is created amongst neighbouring countries to attract companies.

about the number of people we want[ed] to mobilise' (AAUK ex-staff member, interview, 2013). Logistically, these numerical targets required local mobilisation and participation: 'if you want that many people mobilising, then it can't just be your national coalition of partners who are just national NGOs ... and it can't just be our Northern supporters who, you know, come out for the G20 event and protest ... those people are in the local rights' programmes ... we don't have them at the national level in capital cities' (AAUK ex-staff member, interview, 2013).

The AAUK ex-staff member recalls how the initial proposal aimed to build national-level coalitions that would link up with the local. Yet, the likely addition of more tax claims, such as VAT problems (see Figure 3), was seen as risking fragmentation in the campaign message, coherence and coalition-building: 'we don't want to make the campaign too broad ... so that it looks very different in different countries ... if the tax coalition[s] decided that in Bangladesh the issue of VAT would really be the thing they wanted to talk about, then it would look really different from South Africa who wanted to look into transfer pricing [related to tax avoidance] or Zambia that wanted to look into tax competition [related to tax incentives]. So how are we ... to engage locally but have some common demands and image internationally and even nationally?.'

**Figure 3 Competing narratives on tax justice in ActionAid, 2008-2014**

<b>Claim</b>	<b>Tax avoidance</b> Multinational stratagems to avoid tax payments in African and Asian countries weaken their public financing	<b>Harmful tax incentives</b> Many tax privileges given to multinationals by governments are unnecessary and create an unhealthy competition amongst countries	<b>VAT / other local tax issues</b> VAT is disproportionate; VAT sharp increases are locally damaging, etc.
<b>Target</b>	<b>International</b> Multinationals (also G20/OECD/UN and governments)	<b>National</b> Governments (also regional bodies, e.g. African Union)	<b>National-Local</b> Governments
<b>Promoter</b>	AAUK (initial narrative)	African and Asian ActionAids/ActionAid	African and Asian national/local coalitions

Source: compiled by the author



**Figure 4 Example of local-to-international frame**

Source: AAUK (2012)

tactic was to compare corporate tax to the tax paid by small traders, suggesting that the former pay proportionally less than the latter (e.g. ActionAid UK 2012, Figure 4).

Eventually, the drafting group strategy to prioritise local-to-national coalitions did not materialise and led the Federation to gravitate towards international and national campaign levels (AAUK ex-staff member, interview, 2013). Instead, the Federation voted to integrate the local level differently. First, by bridging corporate tax claims to the potential financing of public services with the slogan 'progressive taxation for progressive spending' (ActionAid 2012: 137). The second bridging

These were bridging frames that could function as standard for most countries, and still talked to the realm of international policies where international NGOs operated. However, the capacity of these frames to identify subnational targets and to mobilise people locally was more questionable, as explored in the next sections.

### 3.3 Towards local claims – involving other ActionAid member countries in the Tax Justice Campaign (2012-2014)

ActionAid used tax frames alongside aid frames to mobilise people at the early conception stage of the campaign. Then, it moved towards integrating ideas like state tax capacity and tax incentives to the initial tax avoidance frame in the first steps of the campaign. With the campaign's federalisation, the need emerged to link corporate tax claims to the local level. This consisted of notions such as taxes-for-public-services, and tax comparisons between companies and small traders. This section looks at which tax claims were found locally in comments raised by market traders in Nigeria, and if, and how, these were integrated into ActionAid's campaign.

The tax justice campaign had been selected as one of the three multi-country campaigns to be scaled up across ActionAid in the new 2012-17 global strategy, alongside land and women's rights campaigns. In 2013, the campaign was launched and started to function in several countries, including Nigeria. By then, the campaign had integrated tax avoidance, tax incentives and tax transparency as its key demands: '[tax incentives] had to come through because people did not just want to work on transfer pricing [tax avoidance]' (AAUK ex-staff member, interview, 2013). Corporate tax incentives had become the focus of the Federation's campaign launch (AA senior staff member/AA Tax Justice Campaigner, feedback, 2016). These were all international and national claims – yet, it is important to now ask: what happened at the local level where the NGO had planned to mobilise people beyond capital cities to reach its numerical targets and campaign goals?

The campaign was launched in Nigeria in July 2013. During my two stays in 2013 and 2014, AAN had covered international, national and local tax issues (AAN campaign team meetings/ observation, Abuja, 2013-14). In my first stay in 2013, AAN focused on tax incentives. Targets included federal investment authorities and politicians directly involved in granting tax incentives (TJC launch, observation, Abuja, 2013). Some evidence existed about the secrecy and discretion in which tax incentives were granted, and companies that had changed their name to receive tax incentives more than once (TJC launch, National Association of Nigerian Traders speech, Abuja, 2013). Meanwhile, AAN worked on a paper on the subject of tax treaties [related to international tax avoidance] between Mauritius and Nigeria.

A year later, during my second stay, an African Union Finance Ministers Conference<sup>27</sup> was held in Abuja in March 2014. ActionAid, AAUK, African ActionAid offices, and African tax justice coalitions had travelled to the event. A report on illicit financial flows [tax avoidance] was to be presented to the ministers by former South African president, Thabo Mbeki. The potential for regional advocacy and campaigning about the role of tax treaties in enabling corporate tax avoidance was evident. AAN targeted their own finance minister, as she was also part of the African Union High Level Panel on illicit financial flows. Slogans on tax holidays [tax incentives] also remained present in actions during the African Union Conference.

At the same time, the AAN campaign team had undertaken tax work at subnational and local levels. AAN published two policy briefs about Nigeria's tax policy and administration and the effects of Nigeria's tax system on women (ActionAid Nigeria 2013b, 2013a). Before the national campaign launch in Abuja, AAN had organised a series of 'budget and tax justice' workshops with partners and allies in Benue, Delta, Kaduna and Ondo states (workshop reports/observation, Abuja, 2013). A key issue faced by market traders that was mentioned in these workshops was multiple taxation, which was understood as a situation in which a taxpayer is taxed more than once for the same activity or item due to a lack of tax collection

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<sup>27</sup> <[www.uneca.org/pages/about-conference-1](http://www.uneca.org/pages/about-conference-1)>.

harmonisation between national, state and local administrative tiers (Oboh et al. 2013; Pitigala and Hoppe 2011).

Earlier on, ActionAid local partner in Ondo, JDPC, had recorded a video on tax justice with market traders and tax administrators of the area.<sup>28</sup> JDPC-Ondo had launched this on its regional TV show, *JDPC ½ hour*.<sup>29</sup> JDPC's coordinator summarised the lack of tax statistics and transparency, a poor tax administration and a multiplicity of tax payments or multiple taxation as three key challenges. In turn, the traders interviewed in the video noted the lack of benefits or public services that should derive from the taxes they paid. Traders also noted sudden and steep tax increases and flat tax rates that ended up being disproportionate for some payers. Untailored taxes are part of the methods of presumptive tax collection common in the informal sector.<sup>30</sup> Complaints were also made about tax collection misuse and harassment of traders.

Some of these claims were also studied by Okonkwo (2016a, 2016b), who found out that, in Onitsha city, south-east Nigeria, charges had gone up from NGN192, to NGN4,800, to NGN30,800 for accumulated tax arrears.<sup>31</sup> Women traders had asked local tax authorities to change standardised collective payments for individual business assessments and adapted tax collection. In Onitsha, the state government task force on revenue collection is popularly known as *Ndi Mpiawa Azu* (those who break peoples' backs with sticks).

Claims similar to those gathered in the video also emerged in interviews held with traders during market visits (2013-14). For instance, the chairman of the rice sellers association at *Ojo-Oba* [Isikan] market in Akure explained that they paid three types of taxes every year – income tax, industrial tax and local government tax.<sup>32</sup> He added that all members complied with paying taxes, because they thought that these were just if used properly – for instance, in schools and hospitals. Yet, he complained that the tax was high and that they were being taxed based on the size of their shop and quantity of stock, instead of their income or profit (Etim 2014b).

The existence of multiple taxes is aggravated by the fact that they exist in parallel with other multiple payments, such as market rent and service fees (electricity, toilets, waste management and water). Moreover, payments may not start at the marketplace for a trader, but earlier in the chain, all the way from the product collection point to the market selling point, especially if products cross state borders. For instance, the leader of the *Eso di Owo* plantain association said that they paid taxes for lorry loading and for moving beyond a state boundary. The loading permission was collected by the local government at their shop. The amount was NGN300-NGN500, but varied depending on the product quantity – it was NGN2,500 for big loads – and at each marketplace. She said there was no specific amount for the state boundaries, and it depended on the goods. It was the state government that collected at the borders. A member of the same association, in another interview, confirmed that they paid NGN500 for loading stuff, although they paid more (NGN1,000) in the nearest market because the place was bigger. The local government collected every five days (Akure's outskirts market, 2014).

Added to situations where there was multiple taxation and multiple payments was the existence of touts, or fake tax collectors, charging market traders (JDPC video, 2013) –

<sup>28</sup> Some tax activities held by partners started before the Nigerian TJC had been launched, which shows some level of partner autonomy vis-à-vis the international campaign planning process led by ActionAid's Federation.

<sup>29</sup> Video (Ondo 2013): <<https://youtu.be/5GHgiJ2osTE>>.

<sup>30</sup> Presumptive taxation is a method of tax collection that uses indirect estimations of the income on which tax should be levied. See <<http://onlinelibrary.wiley.com/doi/10.1111/j.2040-0209.2013.00429.x/pdf>>. Since flat tax rates derive from ballpark calculations on the size of a business place or product sold rather than on the exact income that traders make, these were deemed unjust.

<sup>31</sup> The approximate exchange rate at the time of fieldwork (2013-14) was GBP1 to NGN481.

<sup>32</sup> For the sake of simplicity, we are considering Isikan and Oja-Oba bordering markets in Akure centre as one entity.

multiple collectors. Some unions charged with the intermediary role of collecting tax were also identified with tax misuse. A butchers' association member noted he paid NGN500 tax to the union leader, and then the leader paid the government. Yet, they did not know the exact amount that the state collected from the leader (Akure's outskirts market, 2014). A plantain association member in the same market added: 'government officials brought some receipt books so that the association collects tax. Some boys fought for the emancipation [sic] ... they don't want the government to intervene'.

Claimed made by traders	Claims made in the campaign
---	Tax avoidance
---	Tax incentives
---	Tax inefficiency / transparency (linked to low non-oil tax revenue)
Tax for public services (linked to local and market services they use)	Tax for public services (linked to corporate frames)
Multiple taxation	Multiple taxation
Tax corruption	---
Tax harassment	---
Flat rates/presumptive tax collection	---
No tax for women/widows	---

**Figure 5 Comparative list of claims made by traders and claims made in the campaign**

Source: compiled and interpreted by the author from the JDPC tax video, interviews with traders in markets, campaign observation including workshops with traders, and campaign documents.

Market taxes were often collected as an immediate payment, which sometimes came accompanied by harassment, such as seizure of products and shop closures. Quick payments aimed to prevent non-registered or highly mobile taxpayers from evading payments. Ondo's tax inspector noted that it is common for traders to relocate in the event of high tax obligations (JDPC video, 2013).

Still other interviewees claimed that women, and especially widows, should pay no tax (market interviews/ workshops, Akure, 2014). A market woman in

Isikan market explained: 'I am not supposed to pay tax. Why I go pay tax? I am responsible for my children and home ... I can't allow you to take my photo [said to the interviewers during the market visit] but you can take my photo with my three children on the street protesting when women are forced to pay tax' (Etim 2014b). Another widow with seven children selling yam flour stressed that widows should be taken care of and be seen as part of the government's responsibility rather than paying tax (Etim 2014a). These claims resonate with the protests of women against female taxation since the 1920s described in Section 1.5. More extracts from interviews with traders were gathered in Sempere (2015).

Two claims, among the many made by traders, became predominant in the campaign at the national level, namely tax-for-public-services and multiple taxation (see Figure 5). It is not fully clear why some claims were taken up by the campaign, while others were not. Some claims, such as 'no tax for women', would have been difficult to defend in a contemporary campaign. It would appear that market women gain money as men do despite their other roles, so they should pay tax. Yet, tax exemption for some groups like widows, if not all women, was a case that could be made.

On the other hand, ActionAid's campaign strategy already came with a tax-for-public-services discourse, so this, in a way, coincided with what we found was claimed by traders. The campaign presented the idea that funding of public services could arise as a result of ending tax avoidance and harmful tax incentives. However, traders linked funding for public services as being what arose from their own payments of tax and fees. This was a sort of smaller tax cycle, both collected and spent in the area. We only heard of one trader noting something close to corporate taxation: 'this tax is the one that they will cooperate [use] for the government workers. But maybe I'm hearing that there's oil in our nation, but I don't know what they are using the money for, the money of the oil. We in communities, we don't know' (interview, Gobue, FCT, 2013). As for the inclusion of multiple taxation as the other campaign claim raised nationally, it is uncertain why AAN/JDPC-Ondo selected this, instead of, for instance, the challenges of tax rises and flat rates.



### 3.4 Campaign actions and their relation to market traders (2008-2014)

In the past sections, we examined the history of the Tax Justice Campaign and the claims that AAUK, ActionAid's secretariat, AAN, and JDPC-Ondo had put forward at each level. We compared this to the claims of traders. This section moves from claims to look at the actions led by the different campaign actors, and whether, and how, they involved traders.

A 'repertoire of action' is a set of protest actions that a group can use to make claims, such as a march or a strike (Tarrow 2011; Tilly 2006). As part of the idea of resonance, certain claims – and the actions that represent them – work best when they are culturally appropriate and able to match the audience's priorities. If we take market traders as the audience, several efforts were made in the campaign to integrate them through claims and actions.

As seen, claims that bridged international/national and local levels were explicitly sought. Equally, information about tax claims by traders was collected and fed into the campaign, for example through the JDPC-Ondo video and workshops. Some campaign actions did integrate traders (see this section). However, there was no formal campaign strategy to integrate actions led by traders taking place outside the campaign (see next section).

Internationally, ActionAid's tax campaign team at the international secretariat had some tactics to link up to national and local levels through actions. For instance, they supported regional activism by informing country activists of regional opportunities, such as the African Union Conference taking place in Abuja in 2014. They also coordinated online, through email and SMS (Internal ActionAid TJC Team Newsletters, Feb 2013-Dec 2014). This included a photo petition in which people filled up a note for a photo with the public service they would most like to have financed in their area through tax. These could then be handed in to local and national campaign targets, used in exhibitions, and/or uploaded with the hashtag #taxpaysfor.<sup>33</sup> While some 'tax pays for' examples with traders took place, the initiative was not systematically applied with them.

In Abuja, AAN staff and campaigners mobilised with rallies, online/mobile actions, traditional and Twitter conferences, theatre sketches, and government pressure through visits and workshops. AAN staff also covered high-level lobbying visits such as breakfast meetings and media work (see Figure 6). In AAN actions, market traders intervened in some conferences and workshops where tax authorities were also present, for instance, the national campaign launch.

In Akure, JDPC-Ondo undertook a number of state-level initiatives on tax, including the tax TV documentary, advocacy visits to tax authorities, tax workshops between farmers/traders and government officials, tax rallies and 'market storms' (see Figure 6). Market storms were when campaigners visited markets and other popular places like motor parks and bus stops. Market traders were informed and given leaflets. They were interviewed about their problems and sometimes these were captured by audio or video recorders. Market storms could be part of street marches or stand-alone (AAN-AAUK internal meetings, Abuja, 2014). They were performed by Activista youth campaigners in places like Abuja, Akure and Lagos (Activistas records and observation, 2013-14). Market storms involved traders who were not known previously by ActionAid's partners or the campaign.

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<sup>33</sup> <<http://taxpaysfor.tumblr.com/>>.

**Figure 6 Examples of AAN and JDPC repertoires of action**



Source: Akinola Adekunle and Kas Sempere

Some interaction between tax authorities and market traders existed in campaign actions, notably in workshops and market storms. For instance, JDPC-Ondo invited the Ondo's state tax inspector and other tax governmental roles to a rally and market storm in Akure. The tax authorities participated, carrying the same placards as JDPC-Ondo and youth campaigners (Activista report and photos, Akure, 2013; see Figure 7). While market storms could be initially seen as informative actions, they turned more political when governmental authorities were invited and challenged to hear about market people's tax challenges first-hand. However, the sight of NGOs alongside these authorities ran the risk of being misread by traders as a sign of NGO co-option.

This interaction was not always straightforward, and some preparatory work was needed by JDPC-Ondo staff and campaigners. For instance, this particular rally-market storm involved prior work with state tax authorities that included media sensitisation and indoor advocacy. First, a video was recorded about tax problems from market traders, which included tax authorities as interviewees. Then, the video went live on a TV programme run by JDPC-Ondo. An advocacy visit to the tax authorities followed some days later. After that visit, the rally took place in the central Akure market with the authorities (see Figure 7).

**Figure 7 Ways of relating to tax authorities in Akure**



Source: Akinola Adekunle

### 3.5 Market trader actions and their relation to the campaign (2008-2014)

This section shifts the perspective from internal campaign actions and whether and how they involved market traders, to tax actions taken up by traders themselves outside the campaign.

How similar were their own actions to those undertaken through the campaign, and how integrated were the former with the latter? An examination of the traders' actions shows that they were different to those carried out in the campaign, and that no strategic thinking had taken place to integrate the two. In fact, some of the actions were too unpredictable or too drastic to be part of a wider campaign.

Integrating the demands and actions of market traders into the campaign was important for campaign mobilisation and ownership. Market traders dealt with their daily tax challenges vis-à-vis tax authorities in diverse ways. I have categorised these actions into three groups – individual petty resistance, collective demands and negotiation, and collective protest actions. Petty resistance includes small disagreements over tax receipts by individual traders with tax collectors, as well as the arrangement of taxable stock to pay less. Demands and negotiation covers letters and visits to the authorities from traders. Protest actions include closing down shops and confronting tax collectors collectively on their arrival.

Only the last category, collective protest actions, would be considered repertoires in the strict sense. Yet, I present the whole spectrum of tax practices by traders to put their protest actions in perspective. Also, in the larger sense of the word, I still consider petty resistance and demands and negotiation as less overt political practices in what are very delicate contexts in which to protest (Scott 1990). Moreover, we cannot understand one category without the others, as they are likely to feed each other – for example, the sum of small petty resistance and discontent can nurture larger collective action.

An example of petty resistance was seen with farmer and trader Oluchi in peri-urban Kuje, FCT state, who shared how getting hold of the right tax receipt, or getting it at all, was often a battle for payees (interview, 2013). Receipts could be absent, fake or incomplete. She once had to disagree, to little effect, about the tax receipt's amount, since the quantity registered by the tax officials in the receipt was less than the amount actually paid. While the trader said 'no' to this, she seemed to be forced to eventually comply:

There is [was] a certain time that I carry gari [cassava flour] to the market. They [tax collectors] write it on the receipt – NGN50 tax and they say that I will pay NGN400. I say no. [I say] I want to see it. They said I can't see it. They wrote it down. They wrote down NGN50 while they collect[ed] NGN400 from me. Then they say, no. The quantity of gari is NGN400. They force me to collect the money. I give the money before I sell (interview, 2013).

Another example of petty resistance was to arrange taxable products into smaller pieces to reduce the tax to be paid, as done by one farmer and market seller interviewed:

Last year I carried yam in the market, I carried 100 tubers of yam. As I reach the market, I hear that the tax they put on the yam is more than the money I carry with me in the vehicle. So I don't know how to do. I share [cut] this yam, 20, 20, 20, so that the tax[es] are not many, but they [tax collectors] come, they say ... the back of the yam is the same colour, so they joined it together. Big tax. I paid almost NGN1,000 ...

I sold the yam for NGN7,000. I paid the tax for NGN1,000. I paid for transportation to carry the yam to the market NGN1500. I pay to transport myself back to the village. I pay NGN400 because of our road, it's not good, back to the house. I take NGN1,000 out of the money, I buy ingredients [food]. I want to pay my children [school] fees. The money, no reach. Because the money I carry back ... I have many children ... Who I will pay and who I will not pay? ... These are the challenges we are facing in our community (interview, Kuje, FCT, 2013).

Besides these tense individual interactions with tax authorities, another tax practice that market traders resorted to was to formulate collective demands through letters and visits to the authorities to ask for a reduction or a cancellation of tax. A 50-year-old yam seller at Akure's main market *Isikan* explained to an interviewer (2013) an occasion where the government wanted to introduce a new tax of NGN10,000 per annum. The yam association went to the government on behalf of her, and other sellers to reject the new tax.

In a visit to the same market a year after, a group of widows selling cloth also complained that they had visited the government to stop a tax rise without success, and that support from JDPC-Ondo had been requested. The widows' group leader noted:

The market woman pays a rent of NGN30,000 per year for her lock-up shop place in the market... The [state-level Board of] Internal Revenue is in charge of collecting tax. Sometimes they [tax collectors] don't come monthly and sum up the payment of various months. If market people don't pay, the authorities close up the shop. The government started coming three years ago. The first year they [traders] paid NGN2,000. Last year, the amount was raised to NGN3,000 and this year to NGN12,200 (interview, 2014).

When the news came that they should pay NGN12,200, some members reported falling sick. The widows' group leader herself fell sick for a week because they did not know where to get the money from. They went to the State Governor's Office to complain, but there was no reply. She said that they have widows amongst their members or lazy husbands [sic] or those who collect bank loans. That amount is too much for people, so people take loans. She said: 'take for example, I am a widow, I still have to feed my children, pay for school fees and house rent ... but if we don't go out of the house, people are going to think we are lazy' (interview, 2014).

A final way in which traders avoided tax payments was through confrontation through closing down shops when the tax collectors arrived. A female trader in Kaduna's central market explained that market traders had closed down shops and faced tax collectors to avoid paying a new tax (interview, 2014). Similarly, a collective shop closedown and revolt was reported in a central commercial street of Akure at the beginning of 2014. The president of the Tax Justice Network in Ondo, whose office is on that street, noted:

For some time, this street ... you can't go to any shop, it is locked, because the commoners [sic] would be going, the local government is following. All close their shops ... to pay NGN30,000 at the end of the month ... [it is] so difficult to pay that ... there was a mini protest, they wanted to [?] ... This street, when they came, they mobilised themselves, they confronted them [the tax officials] ...

... there is no money circulation, there is no employment for our children... no road, no electricity ... When they [the traders] attacked, they [the government] withdrew back, they went back to strategise ... they didn't pay at that period, early this year, so the governor went back to strategise, the Board of Internal Revenue, and I think by the time they go back, they will be more forceful ... it happens. Around Christmas time, people want to comply and the money is not in circulation' (TJN-Ondo, group discussion 2014).

In short, we can conclude that the actions initiated by traders outside the campaign just described were different to those found inside the campaign, which were described in the previous section. There was no strategic thinking on the campaign side to identify these trader-led actions and see how they could be integrated in the campaign. One reason for this could be related to the fact that NGOs function through pre-defined project activities. Also, some actions were too unexpected (petty resistance) or too confrontational (closing down

shops) to allow for alignment in a more planned and contained campaign repertoire. However, there is support for other actions such as letters and visits to the authorities that could have been easily integrated. Even the more confrontational actions could be supported where a campaign alignment exists.

## 4 Discussion

The previous section describes the claims and actions that developed during the tax campaign, and compares them to the tax claims and actions from traders outside the campaign. This section looks at how ActionAid managed to link up local, national and international campaign levels while staying autonomous and resonant at each level. This was important to mobilisation for at least two reasons. First, linking campaign levels provided a fuller reading of the causes of tax injustice that affected traders both inside and outside Nigeria – this distributed the onus and mobilising strategies for change across different political targets. Second, while linking levels was key, prioritising the most resonant claims at each level was equally important – this prompted greater engagement and response from the different targets at each level. At the local level, trader-led claims gave an indication as to the best entry points for mobilisation.

**Discussion 1. Linking up campaign levels was important to provide a full understanding of how tax injustice affected market traders in the campaign. The ability to include causes of tax injustice both inside and outside the country helped identify diversified and complementary political targets and opportunities for tax justice change.**

At different moments in the campaign, we could observe how a variety of claims were used at the same local event and, to a lesser extent, at the same national event. For instance, JDPC-Ondo and youth campaigners defended claims such as tax avoidance, tax incentives and multiple taxation in workshops held with campaigners and tax state authorities, as well as in market storms and rallies – see the rally in Akure with different tax claims in Figure 8.

**Figure 8 Diversity of tax claims in an Akure rally**



This range of claims was also present at the national level in Abuja, although less often. For example, AAN campaign staff brought multiple taxation and other local matters to national attention through policy briefs and public events (observation, Abuja, 2013-14). Activista youth campaigners performed a self-made theatre sketch during the national campaign launch in Abuja, putting forward the challenges of multiple taxation and tax harassment faced by market traders.<sup>34</sup> This was done in the presence of high-level decision-makers and civil servants, amongst which were the national tax authorities or Federal Inland Revenue<sup>35</sup> and the national investment authorities or Nigerian Investment Promotion Commission<sup>36</sup> (observation, Abuja, 2013).

We could thus say that campaign levels were linked up in two ways. First, by using frames that were themselves bridges, such as the end of international tax avoidance practices to finance local public services (see Section 3.2). Second, by using a range of claims with different international, national and local targets at a given level or event, for example a rally in Akure, a national campaign launch in Abuja.

This linking of campaign levels through these different strategies was important for mobilisation, because it enabled a broader understanding of tax injustice for those involved. The different claims, when put together, exposed complementary international and domestic causes of tax injustice affecting traders in Nigeria. While tax avoidance emphasised an external cause affecting international targets, tax competition and multiple taxation unveiled more internal causes affecting national and local targets. Exposing only the international causes of tax injustice would have taken responsibility away from national and local targets such as the Nigerian government. On the other hand, exposing only the national and local causes of tax injustice would have assigned all the blame to national and local targets. Rather, the campaign reached complementary political targets and opportunities for change.

In other words, tax avoidance exposed an international structure of tax injustice and poverty creation with multinational companies and foreign governments (including the UK and other OECD donor countries) that affected the national and local territory. The goal here was to achieve change at the international tax policy level. Yet, only looking at causes of tax injustice that are external to Nigeria would be incomplete. National and local interpretations of tax injustice (e.g. tax incentives, multiple taxation) addressed causes of poverty that did not have international causes and targets. This suggested that the causes of tax injustice were both external and internal to Nigeria, and that a complete framing of tax justice in the campaign was best for change.

Additionally, this broader understanding is important for how campaign actors and targets such as market traders, the Nigerian government or the UK government are perceived and see themselves. For instance, in 2009-10 the Department for International Development's tracking surveys suggested that the UK public saw the causes of poverty as internal to low-income countries, with corruption seen as the main cause by over 50 per cent of respondents, as well as famine, war, natural disasters, bad governance and overpopulation. The only significant external causal factor identified was international debt, cited by 10 per cent of respondents (Glennie et al. 2012).

**Discussion 2. While linking levels was important for a coherent campaign perspective on tax justice and diversified mobilisation and targets, 'reserving' the most resonant claims at each level was conducive to more tailored responses from the different targets at each level. Locally, trader-led claims give a reference to the best entry points for mobilisation, before moving into more unknown or distant campaign claims.**

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<sup>34</sup> Video (Abuja 2013): <[www.youtube.com/watch?v=BO\\_NBw03O6o](http://www.youtube.com/watch?v=BO_NBw03O6o)>.

<sup>35</sup> <[www.firs.gov.ng](http://www.firs.gov.ng)>.

<sup>36</sup> <[www.nipc.gov.ng](http://www.nipc.gov.ng)>.

Claims attracted the attention of their targets best when these were played out at their respective natural levels – where the targets with decision-making power on that particular issue were located. Consider the next three situations at different levels of the campaign. Counter-frames from targets were identified here that did not agree on the meanings of tax avoidance, tax competition and multiple taxation as suggested in the campaign:

- Internationally, a series of public exchange letters took place between ActionAid and the multinationals and banks targeted by the NGO, in which the meaning of tax avoidance was disputed. In the African Union Conference, Liberia’s Minister of Finance mentioned how ActionAid showed that treaties were unfair while the Mauritius representatives told an AAUK staff member that they should be ‘having a word’ (pers. comm, 2014). As a result, meetings were planned after the event between AAN and the Nigerian Minister of Finance’s assistant to discuss AAN’s participation in an upcoming tax stakeholder group (AAN staff member, pers. comm., 2014).
- Nationally, a representative of the Federal Tax Authorities (FIRS) nuanced the term tax incentives as having ‘their good and their bad side’ during the national campaign launch in Abuja (observation, 2013). This obliged AAN to clarify and reiterate that they referred to harmful tax incentives to avoid an easy questioning of the campaign rationale – that is, accepting that there may be cases where tax privileges for multinationals are justified.<sup>37</sup> Reducing the number of tax incentives, or the way they are dispensed, is one of the easier unilateral actions that a national government can take (AA Tax Justice Campaigner, chapter feedback, 2016). Thus, this looks like a key claim to campaign for nationally.
- Locally, there was debate on the meaning of multiple taxation between Ondo’s tax authorities (the Ondo State Board of Internal Revenue, BIR-Ondo)<sup>38</sup> and activists from JDPC-AAN. In a JDPC and Activista visit to the BIR-Ondo, an official denied the existence of multiple taxation by referring to the tax harmonisation regulations between federal, state and local governmental tiers. He attributed this term to the confusion that traders made between tax, rate and levy (Activista report, 2013). A month later, the AAN campaign officer exposed the legal loopholes, corruption and insufficient application of the tax harmonisation policy in a workshop coordinated by AAN and JDPC-Ondo and attended by BIR-Ondo (observation, Akure, 2013). The JDPC coordinator added on that occasion that: ‘tax or rate or levy we are dealing with humans. Money is dripping from my pocket ... the local government, they don’t give flat rate but arbitrary bills ... multiple taxation ... comes from the same income, that of the poor person’ (observation, Akure, 2013).<sup>39</sup>

There were a variety of claims engaged in addressing different campaign targets, from international bodies to national and local authorities. Not all opponents engaged with the same frame even when the tax avoidance frame was present in all these three scenarios. For instance, Ondo’s tax authorities had little power over tax avoidance, while they could speak and act upon an issue such as multiple taxation. Targets were best engaged when the issues were familiar and viable to them.

Frames that targeted activity by multinationals – tax avoidance and tax incentives – were not included in traders’ claims (see Section 3.3). Only AAN, JDPC-Ondo and youth campaigners campaigned on corporate taxation. As an AAUK ex-youth engagement manager reflected: ‘a lot of people who work in our ... programmes say, well, I can’t go to the community that are

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<sup>37</sup> ActionAid had already defined harmful tax incentives in the *Give us a Break* report on corporate tax incentives used for the international TJC launch in 2013 (AA Tax Justice Campaigner, chapter feedback, 2016).

<sup>38</sup> <[www.jtb.gov.ng/state-boards-internal-revenue](http://www.jtb.gov.ng/state-boards-internal-revenue)>.

<sup>39</sup> All these versions could be correct. While tax authorities could be right that there is confusion in the community around multiple taxation, it can still be the case that the problem of tax harmonisation persists.

desperately poor, that really need an irrigation system, and be like: “you should be lobbying the government to stop tax breaks [tax incentives] for big multinational companies” (interview, 2013).

Even when corporate frames were linked to public services in the campaign, they were still harder to activate. Financing public services from corporate tax is a legitimate and important claim. Yet, from a local angle, this process takes time to happen, which is less appealing for mobilisation. The frame would require, first, that the previous step of raising corporate tax nationally takes place; then that this money, once collected, is allocated to public services; and that it is properly distributed and managed. This is a long-term benefit loop for market traders to wait for. Instead, traders related the funding of public services to the money that was collected from them locally, rather than that which could be collected from corporations.

Similarly, the comparative frame between the taxes that multinationals pay and those that market traders pay may not have the same resonance in all contexts. Ondo is a farming and civil service state with no industrial multinational activity (TJN-Ondo, group discussion, 2014). This increases the difficulty of identifying physically and culturally with a nearby corporate target. In the claims of traders, governmental authorities were the natural targets.

From the perspective of resonance, market-trader-led claims can help campaigners to know the best entry points for mobilisation, before moving into less familiar or distant campaign claims such as tax avoidance and tax competition.<sup>40</sup> This does not mean that claims with international and national targets should be excluded from local campaigning. As noted in Discussion 1, they are important for a full understanding of tax injustice, as this phenomenon is not only local, or national, or international, but multi-causal. Rather, claims with distant targets could be gradually introduced at a later stage in the campaign once local mobilisation has consolidated. All in all, it seems important that claims with local targets are introduced first and work autonomously, with or without the accompaniment of other claims. To a certain degree, this happened in the campaign when multiple taxation was discussed with market traders, for example with the JDPC-Ondo video, before corporate campaign claims were introduced.

## 5 Conclusion

ActionAid’s tax justice campaign in Nigeria is a positive example of a locally grounded international campaign. The NGO’s decentralised and flexible structure facilitated this. Staff in ActionAid Nigeria and its partner organisation JDPC-Ondo were relatively autonomous from the international campaign’s overall strategy plan. They led on campaign themes that were not part of the campaign planning initially, such as the challenges of multiple taxation raised by market traders outside the campaign.

More could have been done to integrate market traders into the campaign. For instance, more local demands from traders could have been included, such as those on sudden and steep tax increases, tax harassment and claims on local tax collection for local public services. The campaign could also have supported the market traders’ actions – not only their claims – such as visits they made and letters they sent to governmental authorities outside the campaign, and even their tax strikes if, and when, they aligned with the campaign ethos.

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<sup>40</sup> ActionAid staff, partner staff and I designed a tax toolkit for ActionAid’s Tax Justice Campaign with three sections to progress from topics familiar to traders to less familiar ones in later stages, <[www.actionaid.org/publications/tax-power-campaign-reflection-action-toolkit](http://www.actionaid.org/publications/tax-power-campaign-reflection-action-toolkit)>.



Overall, however, the campaign managed not only to integrate market traders' demands as local campaigning, but also, on some occasions, to bring these issues before tax authorities at the national level. At the same time, national and international aspects such as tax avoidance and harmful tax incentives were also visible at the local level. Thus, ActionAid succeeded in linking local, national and international campaign levels, while staying relevant across the campaign by targeting different opponents at each level.

This was important for at least two reasons. First, linking campaign levels facilitated greater understanding of the causes and targets of tax injustice affecting traders in the campaign, rather than only the international causes (such as tax avoidance by multinationals), or only the national and local causes (such as harmful tax incentives and multiple taxation by Nigerian authorities). Working at multiple levels distributed the responsibility and strategies for change across different political targets, and with better understanding of the challenges of tax injustice. This showed that the phenomenon is not only local, or national, or international, but multi-causal. Second, prioritising the most resonant claim and target at each level – tax avoidance internationally, harmful tax incentives nationally, and multiple taxation locally – encouraged engagement from campaign audiences and different political targets, from multinational corporations, to ministers, and to national and local tax authorities.

The order in which campaign claims were introduced was also important. To a certain degree in the campaign, multiple taxation had already been discussed with market traders before international and national corporate campaign claims arrived – such as through the JDPC-Ondo video. The trader-led claims are likely to be the best entry point to mobilise market populations, and make the campaign solid, effective and owned by them. This can be done before bringing in claims with less familiar and harder to activate targets at local level. Overall, claims with distant targets are better introduced at a later stage in the campaign once local mobilisation has consolidated.

This paper aims to help build an understanding of international campaigns that achieve the greatest mobilisation of those most affected by the campaign topic. ActionAid's work discussed here provides a positive example for other tax justice campaigns willing to give a stronger voice to market traders. At a theoretical level, the paper has sought to contribute to the tax literature by exploring the areas of tax activism and tax justice, especially from the perspective of local tax collection.

Finally, the concepts chosen from social movement theory – frames, repertoires and resonance – did help navigate most aspects of the campaign. However, integrating other theoretical approaches, such as Scott's (1990), could have been useful to gain a better understanding of the subtle and petty forms of resistance that happen in the marketplace. These forms of resistance are as important as – and probably interact with and feed – the smaller number of more politically overt traders' claims and protests.

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