

Accountability in Aid

Aid Agencies, the United Nations, and Food Aid to the Republic of Georgia

By Till Bruckner

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EXECUTIVE SUMMARY

In August 2008, the Republic of Georgia and Russia fought a brief but bitter war that made headlines around the world. Several days of intense fighting left hundreds of people dead. Tens of thousands of Georgians were forced to flee their homes and suddenly found themselves displaced within their own country. As Russian troops took up positions near Georgia's capital and the republic's economy teetered on the brink of collapse, the future of the Georgian state itself suddenly seemed in question.

The United States and the European Union were determined not to let Georgia disintegrate. The country has less than five million inhabitants, but it sits astride the only pipeline that directly links Caspian oil and gas fields with Western markets. Furthermore, the Bush administration had repeatedly hailed the Georgian government as a democratic success story and a key ally in the region.

Driven by strategic considerations and humanitarian concerns, international donors pledged to provide \$4.5 billion in aid to Georgia. As part of the overall aid package, millions of dollars were to be used to provide emergency food aid to tens of thousands of Georgians who had been affected by the fighting, including many who had been forced to flee their homes during the conflict and were now internally displaced.

This report addresses the transparency and accountability of four aid agencies – CARE, the International Orthodox Christian Charities (IOCC), Save the Children and World Vision – and the United Nation's World Food Program (WFP) during their provision of food aid to conflict-affected people in the Republic of Georgia in 2008-2009. After a brief section providing some background information on food aid in general and the specifics of the Georgian situation, this study briefly presents three case studies:

1. The size of food rations distributed by the World Food Program (WFP) and four NGOs
2. The size of quality of food rations distributed by the WFP and four NGOs
3. An information hotline for aid recipients publicized by WFP

The report concludes that the UN and four charities used donor money to distribute insufficient, inappropriate and in some case useless food rations to thousands of Georgians traumatized by war and displacement without being subsequently called to account. The three case studies document how food aid delivery in Georgia breached the following four global standards governing emergency aid:

- Sphere (Humanitarian Charter and Minimum Standards in Disaster Response) standards (WFP and all four NGOs)
- Humanitarian Accountability Partnership standards (CARE and World Vision only)
- InterAction standards (CARE, IOCC, Save the Children, World Vision)
- Code of Conduct for NGOs in Disaster Relief (WFP and all four NGOs)

The report concludes with a discussion of current accountability deficits in international aid.

BACKGROUND: FOOD AID AND GEORGIA

In the wake of the war between the Republic of Georgia and Russia in August 2008, at a conference in Brussels in October 2008,¹ international donors pledged \$4.5 billion in aid to Georgia² to be disbursed over a period of three years. One billion dollars of this money was pledged by the United States, making it the largest donor to Georgia. Food aid, priced at \$20 million for a six-month period, was only a small part of the overall aid package. The largest donor for food aid has been the US, followed by the European Commission's Humanitarian Aid Office (ECHO) and over a dozen other donors.

Georgia is unusual amongst aid recipient nations as it has a functioning government strongly supported by some Western countries and a comparatively good port, road and railway infrastructure. Georgian citizens differ from most aid beneficiaries in that they are universally literate, have access to the media, and have the possibility of holding their national government accountable through democratic elections. These factors make Georgia a best-case scenario for aid and development work.

The World Food Program (WFP), a United Nations agency that describes itself as “the world's largest humanitarian agency fighting hunger worldwide,” with around 10,000 employees providing food to more than 100 million people every year,³ had already been working in Georgia for several years when the war broke out. Dozens of international NGOs – including the four discussed in this study – also already had offices in the country. In the wake of the war, WFP and the NGOs started delivering emergency humanitarian assistance in addition to continuing work on their longstanding development projects.

In line with standard operational procedures, donors transferred funds for food aid to WFP, which then procured the food globally through tenders issued by its headquarters in Rome. (Donors may also directly provide WFP with food, rather than with cash, but this was rarely the case in post-war Georgia.) WFP headquarters organized delivery up to the Georgian border, while WFP's Georgian country office was responsible for transport and delivery inside the country.

Around the world, WFP regularly subcontracts NGOs to deliver food aid directly to people in need. In Georgia, it sub-contracted four large international NGOs: CARE, the International Orthodox Christian Charities (IOCC), Save the Children and World Vision. The food was delivered to people displaced by the conflict, and to residents of the so-called “Buffer Zone,” a rural area where much of the fighting had taken place. In total, the war had temporarily displaced over 130,000 people inside Georgia. While most of these had been able to return home by the end of 2008, up to 30,000 people are expected to remain displaced in the long term. As of March 2010, WFP and the four aid agencies discussed in this study are still working with conflict-affected people in Georgia.

CASE ONE: FOOD RATION QUANTITY

As an organization operating on a global level, WFP has a standardized approach towards food aid. Around the world, food parcels should contain the equivalent of 2,100 kilocalories (kcal) per day per beneficiary. In each country, parcels are adjusted according to the availability and price of food and beneficiary preference. In Georgia, WFP's standard parcel – which may have varied occasionally due to breaks in the food supply pipeline⁴ – was heavily based on wheat products.⁵

¹ See Transparency International Georgia's 2008 press release on the conference. “Donor Conference on Georgia Lacks Transparency and Accountability, says Transparency International Georgia”. Available at: [http://transparency.ge/sites/default/files/TI%20Georgia%20press%20release%20on%20Donor%20Conference%20\(Oct2008\)%20ENG.pdf](http://transparency.ge/sites/default/files/TI%20Georgia%20press%20release%20on%20Donor%20Conference%20(Oct2008)%20ENG.pdf)

² For a breakdown and discussion of the \$4.5 in donor pledges, see Transparency International Georgia's two 2009 publications: “Transparency, Accountability and the JNA”, and “Access to Information, Accountability, and Aid to Georgia”. Available at: <http://www.transparency.ge/en/>

³ See the WFP website: <http://www.wfp.org/about>

⁴ Due to the time taken up by tendering and transport, breaks in the food delivery pipeline may occasionally occur even when a WFP country program is fully funded by donors.

⁵ See also Transparency International Georgia. 2009. “IDPs in Georgia: Issues of Concern”. Available at:

Standard WFP food ration in Georgia
(per person per day)

Ration	grams
wheat flour/pasta	450
beans	50
vegetable oil	30
sugar	20
salt	5

The Sphere project, which aims to improve the quality of assistance to people affected by disaster and to improve the accountability of states and humanitarian agencies, has developed a handbook that sets out minimum standards and key indicators for a variety of sectors within emergency humanitarian relief, including food aid.⁶ WFP was heavily involved in drafting the food standards section of the Sphere handbook.⁷

At first glance, the WFP food parcel makeup in Georgia seems to follow the 2,100 kcals per person per day basic global standards set by the Sphere project. However, the Sphere manual (pp. 189-191) clearly states that food rations must be increased if:

- *“the mean ambient temperature is less than 20°C [68°F]” [and/or]*
- *“the mean body weight for adult males exceeds 60kg [132lb] and the mean body weight for adult females exceeds 52kg [115lb]”*

The mean ambient temperature – inside beneficiaries’ dwellings as well as outdoors – during the snowy Georgian winter is well below 20°C (68° Fahrenheit). While relevant statistical data is not available, mean body weights in Georgia are above the benchmarks set by Sphere. Georgians’ minimum daily requirements therefore exceeded 2,100 kcals. However, during the winter of 2008-2009, WFP and its NGO sub-contractors, in a context of plentiful donor funding for emergency food aid and a fully functional national transport infrastructure, did not appear to meet the adjusted global Sphere standards that WFP itself had played a lead role in developing.

There are also questions whether the unadjusted food rations met the standards of the Humanitarian Accountability Partnership (HAP),⁸ of which two of the four NGOs (CARE and World Vision) are members.⁹ HAP’s “principles of humanitarian action” include a commitment to *“ensuring that humanitarian assistance meets or exceeds recognised minimum standards pertaining to the wellbeing of the intended beneficiaries.”*

It appears that neither the Georgian government nor international donors realized at first that WFP and the four NGOs were delivering food parcels that fell short of the minimum needs of those affected by the war. The situation was not rectified until February 2009, when – in an unrelated development – the UN distributed plastic cards to food aid beneficiaries (see also below). With these cards, beneficiaries could withdraw a small monthly cash allowance for “supplementary food” to top up their rations. The supplementary food money, while welcomed, was not distributed to correct the problem of insufficient rations. It was already in the pipeline, intended to allow beneficiaries to buy some fruit and vegetables to top up their food packages with fresh produce. Instead, some beneficiaries had to use it to meet basic

[http://transparency.ge/sites/default/files/IDPs%20in%20Georgia%20-%20Issues%20of%20Concern%20\(April%202009\)%20ENG.pdf](http://transparency.ge/sites/default/files/IDPs%20in%20Georgia%20-%20Issues%20of%20Concern%20(April%202009)%20ENG.pdf)

⁶ The most recent edition (2004) of the Sphere handbook is available in English or Russian and can be downloaded for free:

http://www.sphereproject.org/component/option.com_docman/task.cat_view/gid.70/Itemid.203

⁷ See the official WFP policy paper stating its “Humanitarian Principles” (point 10, page 6):

<http://www.wfp.org/sites/default/files/Humanitarian%20Principles.pdf> “WFP has provided technical support since the inception of the Sphere Project, most recently in the development of the new food security and nutrition chapter. WFP’s standard field-level agreement with implementing partners encourages adherence to the Sphere Humanitarian Charter and standards.”

⁸ The HAP standards are available at: [http://www.hapinternational.org/pool/files/hap-2007-standard\(1\).pdf](http://www.hapinternational.org/pool/files/hap-2007-standard(1).pdf)

⁹ Only CARE and World Vision are members of HAP. Save the Children and IOCC are not HAP members and therefore cannot (and should not) be judged by HAP standards.

requirements such as flour and oil rather than buy fresh produce as intended. During meetings in Tbilisi, after the embarrassing incident became an issue, WFP argued that rations had been sufficient to meet minimum standards because people had this extra money. This turn of events was totally coincidental, however. Otherwise, the affected Georgians might still have been without sufficient rations the following winter.

CASE TWO: FOOD RATION QUALITY

Beginning shortly after the crisis began, the WFP began distributing wheat flour to the needy residents with no incidents. Then in early 2009, using its global procurement system, WFP purchased 1,800 tons of wheat flour from a supplier in Turkey and began distributing it. While the flour complied with WFP procurement standards and was theoretically fit for human consumption, it could not be used to make Georgian bread due to a problem with the flour's gluten index. When people tried to bake bread using the newly procured batch of flour, they found that the bread turned hard, making it barely edible. Mixing this flour with flour from other sources did not solve the problem. The absence of edible bread left thousands of people with a huge calorie gap.

Despite being aware of the problem, WFP together with its NGO subcontractors CARE, World Vision, Save the Children and IOCC continued distributing this flour over a period of weeks. In total, 800 metric tons of the flour costing over half a million dollars were distributed to tens of thousands of people before WFP finally ordered a halt to the distribution.¹⁰ To put this figure into context, the 800,000 kilograms were the equivalent of about 20% of all tonnage distributed by WFP between the outbreak of the August 2008 war and the end of that year, and the equivalent of the flour content of 1.6 million individual daily rations.

The flour scandal briefly made headlines in the Georgian media on March 2, 2009, when members of the opposition Labor Party conducted a self-styled "monitoring visit" to a conflict-affected area. At a press conference, Paata Jibladze, Labor Party Executive Secretary, strongly criticized aid efforts, blaming the government for a variety of problems, including that of the useless flour. A few days later, the Anti-Crisis Council, a body created by the President of Georgia to oversee international aid, summoned the Minister for Refugees and Accommodation, Koba Subeliani, for a televised questioning. According to council staff, they were aware that the ministry had not actually distributed the flour (about which they had received numerous complaints from IDPs), but that they were trying to hold the minister accountable on the basis that his ministry had signed a memorandum of understanding with UNHCR in which the ministry accepted responsibility for coordinating aid efforts to IDPs.¹¹ During the hearing, the minister denied culpability, saying that the flour had been distributed by the United Nations, not by his ministry. The Anti-Crisis Council then wrote a letter to UNHCR, asking it to clarify the flour controversy.¹² Somewhat unsurprisingly, UNHCR never responded to this letter, as it had nothing to do with the matter.

The WFP and its partner NGOs were fully aware of the problem with the flour but downplayed its significance. WFP's original draft for the minutes of a food security cluster meeting held on March 12, 2009, read:

"WFP mentioned the current wheat flour issue; while the quality and fitness for human consumption is good, there is an issue with the gluten index which results in poor performance when bread is baked. WFP is working on finding out more and on how to prevent this in the future. But since the flour is perfectly fit for human consumption, WFP is not planning to take back the distributed tonnages."

¹⁰ This estimation is extrapolated from a flour purchase made by WFP in early 2008 (ref: NET2008-001HQ 01), in which WFP used a donor contribution of USD 695,500 to buy 858 tons of flour. As usual, WFP overheads and operating costs were deducted prior to making the purchase.

¹¹ The author has not asked for, or seen, a copy of this MoU. However, UNHCR officials verbally confirmed that it exists.

¹² The Anti-Crisis Council has eight staff, seven of whom do not speak English and share one room that contains no computers and only one telephone (their "hotline"). While staff is aware of the problems faced by displaced people, they appear unable to ensure effective follow-up by international actors.

When the draft minutes were circulated for review and comments on March 16, 2009, the author of this study replied to the responsible WFP staff member on the same day by email and suggested the following addition, based on comments he had made at the meeting itself:

“Anecdotal reports from the field suggest that some IDPs [internally displaced persons] are using the wheat flour as animal feed because they cannot use it to bake bread.”

WFP did not include the suggested addition in the final version of the minutes, published on March 20, 2009.¹³ Distributing food commodities that are technically safe to eat, but that beneficiaries in practice cannot use to prepare meals constitutes a clear violation of Sphere standards (pp. 157-163):

- *“The food items provided are appropriate and acceptable to recipients and can be used efficiently at the household level.”*
- *“There are no complaints concerning difficulties in storing, preparing, cooking or consuming the food distributed.”*
- *“There are no verifiable complaints about the quality of food distributed... recipients’ complaints about food quality should be followed up promptly and handled in a transparent and fair manner.”*

All four aid agencies working with WFP in Georgia quietly continued distributing the flour for many weeks after they had learned that beneficiaries could not properly use it to bake bread. This arguably violated several standards set out by InterAction,¹⁴ an umbrella association of aid agencies that CARE, IOCC, Save the Children, and World Vision all belong to. CARE and World Vision, members of the Humanitarian Accountability Partnership (HAP), also appear to have violated numerous clauses in HAP’s “principles of humanitarian actions”.

Even after the distributions were halted, and better quality flour was obtained and distributed, WFP never launched an additional distribution round to fill the gap it had left in people’s food supply, nor did it issue an explanation to the government or the intended beneficiaries. All four aid agencies working with WFP in Georgia continued distributing the flour long after they learnt that beneficiaries could not use it to bake bread.

CASE THREE: INFORMATION HOTLINE

In February 2009, WFP in collaboration with two other UN agencies issued plastic cash cards (see Case One) to food aid beneficiaries.¹⁵ In a press release, the UN agencies took credit for the cash transfer program, mentioning that it was being implemented “in collaboration with” the Ministry of Refugees and Accommodation (MRA) and a second government agency. WFP had signed memoranda of understanding with both of them. The release further stated that “a special hotline is operating within the MRA to address questions that may arise during the Program implementation... posters and leaflets were printed and disseminated among the beneficiaries to ensure full visibility and transparency of the Program”. The release concluded with the contact details of all three UN agencies involved, but did not give contact details for the MRA.¹⁶

¹³ The minutes are a public document, and can be accessed at <http://www.relief.migration.ge/intranet>

¹⁴ The InterAction standards are available at: <http://www.interaction.org/document/interactions-pvo-standards>

¹⁵ UNICEF and UNHCR used the cards to make one-off transfers of money to enable beneficiaries to buy warm winter clothes. UNICEF transferred GEL 100 (about USD\$60) for each child under six years of age, while UNHCR transferred GEL 100 for each person aged 16 and above. It is beyond the scope of this study to explore why beneficiaries aged 6-15 were not covered, or why funds for winter clothes were only transferred in early spring. This author learned that several displaced children in the mountainous area of Upper Svaneti had missed school throughout winter because they had no boots and warm clothes in which to walk there. Georgia had by that time already received approximately two billion dollars in aid – nearly 500 dollars per capita. (According to WFP, the introduction of the cards was initially planned for an earlier date but was delayed partly due to factors outside its control; for example, the government did not provide beneficiary lists as quickly as envisioned. This highlights the general uncertainty about who can be held accountable for aid shortfalls when multiple actors are involved.)

¹⁶ UNICEF, UNHCR and WFP. 2009. “Three UN agencies launch joint cash assistance programme for displaced persons in Georgia” (18 February 2009) <http://www.reliefweb.int/rw/rwb.nsf/db900SID/EGUA-7PKQY6?OpenDocument>

The posters and leaflets distributed to beneficiaries prior to issuing the cards prominently featured the logos of WFP and the other two UN organizations, but did not give any contact details for WFP or its sister agencies. Instead, the contact information provided to beneficiaries was that of an MRA telephone hotline, even though the UN knew, or should have known, that this hotline was understaffed and unable to handle a large amount of phone calls as it had been set up by the ministry with the help of the UN.¹⁷

Because the WFP did not provide its contact details to beneficiaries or set up an independent hotline, beneficiaries were not in a position to effectively file complaints if their entitlements to food were not met. The move confused beneficiaries as to who was actually responsible for executing the program. When problems emerged during flour distribution (see above), beneficiaries were unable to voice their complaints to WFP; the MRA hotline never became functional. As a result, the frustrations of those Georgians who became dissatisfied with the program's implementation were redirected away from the responsible agency, WFP, and towards the MRA and the government.

DISCUSSION: AID AGENCY ACCOUNTABILITY

In theory, international aid agencies are accountable to a variety of stakeholders, including private and institutional donors, their beneficiaries, the governments of the countries they work in, and the wider aid community. In practice, as the three case studies above illustrate, aid agencies are often not accountable to key stakeholders.

Accountability to Private Donors

Private donors in wealthy countries simply lack the information needed to hold aid and development NGOs to account for how their donations are used thousands of miles away. The only information available to small private donors is that which is voluntarily provided by the NGOs themselves, who are extremely reluctant to open their books to scrutiny. When contacted by the author of this study, WFP and the four aid agencies would not release the Field Level Agreements governing their relationship, making it impossible to determine how much aid money WFP pays to NGOs for distributing food. The four NGOs are required by the Code of Conduct for NGOs in Disaster Relief¹⁸ (which WFP seems to require sub-contracting NGOs to follow¹⁹) and by InterAction standards²⁰ to grant public access to these agreements.

Accountability to Citizens of Donor Countries

US citizens concerned about the use of their tax dollars abroad may find it equally hard to discover how NGOs awarded grants by USAID are spending their money.²¹ The author of this study filed a Freedom of Information Act request with USAID in May 2009, requesting copies of all NGO project budgets financed with American taxpayers' money during the second half of 2008.²² Nine months later, USAID has still not provided the requested budgets.

¹⁷ The MRA's total annual 2009 budget of around USD 17 million is less than WFP funding during the first six months following the August 2008 conflict. See <http://www.civil.ge/eng/article.php?id=19988>

¹⁸ See Article 9 of the Code of Conduct: "We hold ourselves accountable to both those we seek to assist and those from whom we accept resources... All our dealings with donors and beneficiaries shall reflect an attitude of openness and transparency. We recognize the need to report on our activities, both from a financial perspective and the perspective of effectiveness." See <http://www.gdrc.org/ngo/codesofconduct/ifrc-codeconduct.html>

¹⁹ WFP explicitly requires sub-contracting NGOs to comply with the Code of Conduct: "All NGOs involved in the distribution of WFP-supplied commodities must carry out their activities in compliance with the Code of Conduct". See page 40 of WFPs' official publication "How to work with WFP: A Handbook for Non-Governmental Organizations", available at: [http://www.reliefweb.int/rw/lib.nsf/db900sid/EVOD-6QSCW6/\\$file/WFP%20handbook.pdf?openelement](http://www.reliefweb.int/rw/lib.nsf/db900sid/EVOD-6QSCW6/$file/WFP%20handbook.pdf?openelement)

WFP's template FLA agreement, reproduced in the same manual, however, states that NGOs are merely "encouraged to comply with the Code of Conduct" and/or SPHERE standards. (page 75, point 4.13).

²⁰ InterAction standards, Point 4.8: "Organizations shall substantiate, upon request that their application of funds is in accordance with donor intent or request." Point 5.1: "The member organization shall be committed to full, honest, and accurate disclosure of relevant information concerning its goals, programs, finances, and governance."

See <http://www.interaction.org/document/interactions-pvo-standards>

²¹ In early 2009, Transparency International Georgia asked twelve large international aid agencies operating in the country to make their project budgets accessible to the public. Only one agency, Oxfam GB (which was not receiving USAID project funding at the time), opened its books.

²² The FOIA was filed on May 13, 2009. FOIA Tracking No. F-00003-10

Accountability to Institutional Donors

Institutional donors like USAID usually do have a presence on the ground in developing countries, but rarely directly monitor NGO activities in the field. Instead, they usually, though not always, rely on information provided by their grantees. As the flour donation incident illustrates, this information may not always be fully reliable. (It is unclear to the author whether any donor actually noticed that the flour that was being distributed was nearly inedible.) Interviews with dozens of donor and NGO representatives in Georgia, Afghanistan and Tajikistan conducted by the author suggest that neither NGOs nor donor country offices have an incentive to document instances in which aid money is stolen, wasted or unwisely spent. Projects are almost invariably portrayed as successful, irrespective of realities on the ground.

Accountability to the Aid Community

Aid organizations have responded to concerns about their lack of accountability through a variety of initiatives and mechanisms intended to create mutual accountability within the aid community. Four such initiatives – Sphere, HAP, InterAction and the Code of Conduct for NGOs in Disaster Relief – have been touched upon in this study.²³ At least in this instance, a comparison of NGO declarations on paper with NGO actions in practice reveals that these standards do not adequately guide NGOs' operations on the ground. There are two main reasons for this:

1. These initiatives lack teeth. No participant in any of these initiatives has a vested interest in holding the other participants accountable for their actions. Membership organizations like InterAction often appear to be more focused on protecting their institutional interests and their members. In contrast, those who do have a substantial vested interest in holding NGOs accountable – people directly affected by aid projects – do not have the information or skills needed to hold aid organizations accountable through these initiatives. As the first two case studies suggest, even clear and explicit technical standards can be disregarded by NGOs without triggering adverse consequences.
2. Because these initiatives lack teeth, they are almost universally ignored in practice. Senior staff members at NGOs' global headquarters readily sign up to noble-sounding initiatives and commit their organizations to meeting certain standards, but there is little subsequent follow-up. Few field-level aid workers are aware of the various commitments that their organizations have made.

Accountability to Host Governments

Host governments in developing countries rarely hold international NGOs accountable for their activities. Partly this stems from a lack of interest, as NGO projects typically do not receive funding from host governments. In the rare cases in which host governments do try to hold the UN and NGOs accountable, they frequently lack the capacity to do so effectively. As the flour incident illustrates, the government of Georgia, which is far more capable than most governments in the developing world, was unable to effectively take action on numerous complaints from citizens. While the literature on aid is full of examples of host governments trying to take credit for the achievements of international aid and shifting blame for failures to international actors, the case studies above suggest that sometimes the reverse can also be true.

Accountability to Beneficiaries

There is currently much discussion in the development field about the need to make NGOs accountable towards their beneficiaries. The three case studies presented here show that the rhetoric of 'downwards accountability' is not always paralleled by implementation in the field. There are two main reasons for this:

²³ For more information on these and similar initiatives, see: Transparency International Georgia. 2009. "Accountability to Beneficiaries: an overview of aid agency commitments". Available at: <http://www.transparency.ge/en/>

1. Aid organizations lack institutional incentives to make themselves accountable to beneficiaries. NGOs live off private donations and government grants, so beneficiary satisfaction is irrelevant to organizational growth and survival. NGOs have a vested interest in presenting themselves as accountable to beneficiaries in their publications in order to keep funds pouring in, but have no incentives to actually follow through on their words in a meaningful way. Beneficiaries have little to no power to influence NGOs' actions.
2. Beneficiaries lack the information to hold NGOs accountable. For example, most Georgians receiving food aid come from villages and do not speak English. Faced with a confusing array of foreign acronyms written in an alien alphabet, they do not know (and frequently do not care) which NGO delivers what aid. Beneficiaries in Georgia were generally unaware of which organization had provided their food and who had delivered it. Equally, despite Sphere standards (pp. 162-178) explicitly mandating the provision of such information, beneficiaries did not know when to expect the next delivery, or whether there would be a next delivery at all. Whether intentionally or not, NGOs can skirt accountability to beneficiaries by failing to identify themselves, not providing contact details, or leaving beneficiaries in the dark about their entitlements.

CONCLUSION: ACCOUNTABILITY IN AID

This study has found that during the crisis in Georgia—a best-case scenario of a functioning government, a literate society, and considerable international media and donor attention—international aid and development agencies often breached international standards governing emergency relief and lacked accountability. The UN and its partner agencies might very well respond to this assertion by claiming that the food relief program was largely helpful and that there will always be some problems in complicated emergency response situations. To put these events in context, however, it might be helpful to draw an analogy to what the media and policy response would be in the United States if the government had knowingly distributed 800 tons of inedible food to hurricane victims over a period of weeks.

That such problems do not happen more often is due less to residual safeguards in the aid system, but more to the strong personal commitment, dedication and integrity of many individual aid workers. Time and again, frontline aid agency employees manage to make a positive difference to the lives of people in need. Whenever aid delivered by NGOs 'works', it is often not because of, but despite, the sometimes dysfunctional aid system that these individuals have to work through.

Launching yet another NGO-to-NGO mutual accountability initiative likely would be fruitless. Many standards have already been formulated. The problem is not a lack of standards and codes of conduct, but follow-up, enforcement and sanctioning related to those standards that already exist. As the examples above suggest, oversight by institutional donors such as USAID is inherently difficult because institutional incentives reward donor country offices for reporting successes and punish them for highlighting failures. Adding more of the same by encumbering NGOs that are already drowning in bureaucratic requirements with even more red tape could reduce the ability of committed NGO field workers to assist those in need, and would likely do little to address inefficiencies.

NGO project budgets are the single exception to this rule. USAID could require all grant recipients to post their proposed project budgets online before funding is released. These budgets already exist as part of the formal project proposals, so posting them would require negligible additional effort by NGOs. At a minimum, this would act as a constraint on some NGOs' tendency to pay grossly inflated tax-free salaries to their international staff. However, as Transparency International Georgia's experience has shown, any such initiative might be resisted by NGOs, and probably also by USAID itself, and is therefore unlikely to succeed in the absence of serious and sustained Congressional pressure.

Raising NGO accountability towards beneficiaries may hold out the greatest hope of improving accountability in international aid. However, in order to have real effects, such accountability must be backed by beneficiaries' ability to effectively sanction NGOs when their performance fails short of expectations.