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STUDY REPORT: CORRUPTION RISK ASSESSMENT ON THE LUSAKA-NDOLA DUAL CARRIAGEWAY PROJECT

June 2026

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ACKNOWLEDGEMENTS

Transparency International Zambia (TI-Z) thanks Transparency International Australia for developing the Infrastructure Corruption Risk Assessment Tool (ICRAT) and for providing technical support in undertaking this assessment in Zambia. We also thank Mr. Bright Chizonde for conducting the analysis and drafting this report, as well as Mr. Chimuka Nachibinga, Ms. Tamika Halwiindi, Mr. Tommy Singongi, and Ms. Bwalya Nonde for providing research support. TI-Z also thanks all the key institutions that participated in the Fiscal Transparency and Accountability initiative (FTAI) in Zambia and the ICRAT-based corruption risk assessment. These include the Ministry of Finance and National Planning, through the Public Investment Planning Department; the Public-Private Partnership Department, the Ministry of Infrastructure, Housing and Urban Development; the National Road Fund Agency; the Road Development Agency; the Office of the Auditor General; and the Zambia Environmental Management Agency (ZEMA). We also thank the International Monetary Fund, the Centre for Trade Policy and Development, the Civil Society for Poverty Reduction, Action-Aid Zambia, the National Council for Construction and the Infrastructure Transparency Initiative (CoST) Secretariat in Zambia.

Date of Publication: June 2026

EXECUTIVE SUMMARY

In many African countries, corruption is a major contributor to inefficiencies and to the loss of public resources intended for the delivery of critical infrastructure projects.¹ Corruption thrives in public infrastructure projects due to the multiplicity of actors involved, the complexity and uniqueness of these projects, cultures of secrecy, long delivery periods, and the large amounts of public funds allocated.² In Zambia, between 2016 and 2021, corruption became entrenched and institutionalised, leading to the diversion of financial resources intended for infrastructure projects due to political patronage and rent-seeking.³

In an effort to reduce inefficiency losses and mitigate corruption risks, Zambia has enhanced the public investment management (PIM) legal, policy and institutional framework. The country developed its first National Public Investment Management Strategy⁴ in 2023, seeking to address PIM weaknesses by creating an enabling policy and legislative framework, robust coordination and governance mechanisms, and clear methodological procedures and processes. However, combating corruption in the infrastructure sector requires more than improving the legal and policy framework. There is a need for effective implementation of laws and effective identification and mitigation of corruption risks and vulnerabilities.

Therefore, Transparency International Australia (TIA) developed the Infrastructure Corruption Risk Assessment Tool (ICRAT)⁵ to assist civil society and other stakeholders in mapping and understanding corruption risks, and in identifying mitigation measures at the earliest stage of infrastructure development. Transparency International Zambia (TI-Z) has employed the ICRAT to assess corruption risks in the Lusaka-Ndola Dual Carriageway Project. The US\$ 649.98 million construction project has been at the

centre of national policy debate, not only because of its economic significance but also because of several controversies surrounding it.⁶

The corruption risk assessment identified strong governance aspects and progressive agency characteristics. These included strong public finance and procurement systems, openness to the media and civil society, strong professionalism, and a good reputation for leadership within the Ministry of Finance and National Planning. However, the ICRAT-based assessment also identified key areas of concern and areas requiring further consideration. In the country context, the key areas of concern included the level of public-sector corruption, as measured by the Corruption Perceptions Index (CPI), and the prevalence of political party and tribal loyalties, which dominate business and government appointments and decisions. The major areas requiring further consideration included the level of external influence and the lack of an accessible grievance mechanism.

Furthermore, the project-level assessment established that limited transparency was the primary corruption red flag in the Lusaka-Ndola Dual Carriageway Project. The concession agreement, feasibility study, and environmental impact statement for the Lusaka-Ndola Dual Carriageway Project were not publicly accessible during the study period. This corruption red flag was exacerbated by the limited participation of non-state actors in negotiating concession agreements, especially given the level of external influence, limited asset declarations, and gaps in beneficial ownership, which were identified as areas requiring further consideration in the governance assessment.

In light of the assessment, Transparency International Zambia (TI-Z) recommends strengthening the asset declaration regime by developing comprehensive

¹Wegrich, K.; Hammerschmid, Kostka, G. (2017). The challenge of infrastructure. In: The Governance of Infrastructure. https://www.researchgate.net/publication/316341730_The_Challenges_of_Infrastructure

²Transparency International Australia (2022). The Infrastructure Corruption Risk Assessment Tool (ICRAT). <https://transparency.org.au/icrat/>

³International Monetary Fund (IMF) Zambia: Technical Assistance Report-Diagnostic Report on Governance and Corruption. <https://www.elibrary.imf.org/view/journals/002/2023/003/article-A001-en.xml>

⁴Ministry of Finance and National Planning (2024). National Public Investment Management Strategy. <https://www.mofnp.gov.zm/?wpdmpro=public-investment-management-strategy-2024-2026>

⁵Transparency International Australia (2022). The Infrastructure Corruption Risk Assessment Tool (ICRAT). <https://transparency.org.au/icrat/>

⁶Government of the Republic of Zambia (March 7, 2023). MINISTERIAL STATEMENT ON THE UPGRADING TO DUAL CARRIAGEWAY OF THE LUSAKA TO NDOLA ROAD, INCLUDING REHABILITATION OF THE LUANSHYA-FISENGEMASANGANO ROAD USING PUBLIC-PRIVATE PARTNERSHIP. <https://www.parliament.gov.zm/node/10947>

⁷National Policy on Anti-Corruption. <https://www.npa.gov.zm/wp-content/uploads/2024/05/PAC-Policy-Validated-Policy-16.01.2023-Rev.pdf>

⁸Access to Information Act No. 24 of 2023. <https://www.parliament.gov.zm/node/11547>

legislation to enable all public officials to declare their assets and liabilities periodically and consistently. The Ministry of Finance and National Planning should also expand the planning and publication horizon for public investment projects to ensure that stakeholders have access to multi-year projects pipelines. Considering the findings on the level of public sector corruption, the Anti-Corruption Commission (ACC) should promote integrity by institutionalising asset and conflict-of-interest declarations and mainstreaming integrity tools, as outlined in the National Policy on Anti-Corruption.⁷

TI-Z also calls for increased technical and financial resources to accelerate the operationalisation of the Access to Information Act No. 24 of 2023.⁸ This will ensure public access to relevant information, including key documents on infrastructure projects, such as feasibility studies, environmental impact statements and concession agreements. There is also a need for increased participation by non-state actors in public contract negotiations, as well as increased advocacy and public sensitisation on public investment and public infrastructure management in Zambia.

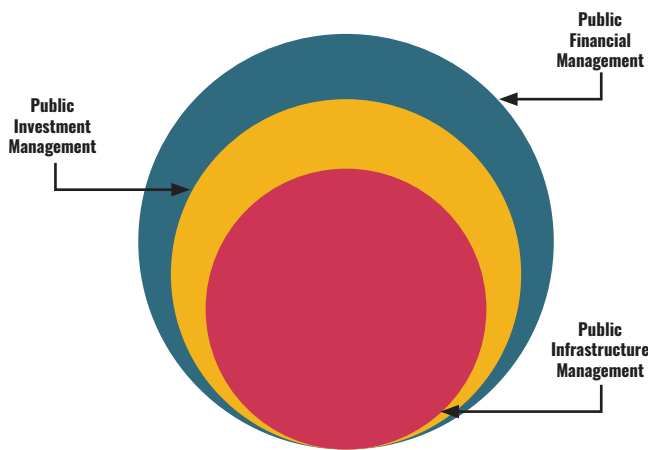
⁷National Policy on Anti-Corruption. <https://www.npa.gov.zm/wp-content/uploads/2024/05/PAC-Policy-Validated-Policy-16.01.2023-Rev.pdf>

⁸Access to Information Act No. 24 of 2023. <https://www.parliament.gov.zm/node/11547>

1. INTRODUCTION

1.1 Corruption Risks in Public Investment Projects

Public investment management (PIM) is part of the broader public financial management system, but focuses exclusively on government spending aimed at creating long-term assets such as roads, buildings, bridges, power plants, airports, and investments in human capital.⁹ A closely related aspect of PIM is public infrastructure management, which focuses solely on the prudent spending and management of public infrastructure and excludes spending on human capital and research.



According to the International Monetary Fund (IMF), effective management of infrastructure projects is essential, as more than one-third of the resources spent on creating and maintaining public infrastructure are lost because of inefficiencies.¹⁰

Globally, Corruption is a major contributor to inefficiencies and the loss of public resources in infrastructure projects. This is because of the prevalence of heightened political and public interests, which often conflict with good governance processes.¹¹

Furthermore, corruption thrives due to the multiplicity of actors involved, the complexity of infrastructure projects, cultures of secrecy, long delivery periods, and the large amounts of public funds allocated to public infrastructure.¹² Between 2016 and 2021, corruption became entrenched and institutionalised in Zambia, leading to financial resources being invested in infrastructure projects, providing avenues for political patronage and rent-seeking opportunities.¹³

In 2025, Zambia allocated approximately US\$600 million to road infrastructure projects and US\$95 million to Health Infrastructure projects.¹⁴ However, critical governance weaknesses in the public investment management framework lead to significant inefficiencies and loss of public resources due to stalled multi-year infrastructure contracts.¹⁵ Between 2014 and 2024, Zambia's Ministry of Health recorded 120 stalled infrastructure projects with contract sums exceeding US\$157 million.¹⁶ According to the Public Investment Management Assessment (PIMA) conducted in 2017, these losses stemmed from critical weaknesses, including the lack of investment project appraisal for domestically financed projects and the absence of a central screening process underpinned by feasibility studies.¹⁷

These PIMA findings are consistent with other studies, which identify poor project appraisal, faulty project selection, rampant rent-seeking and corruption, and insufficient funding as contributing factors to public infrastructure inefficiencies in other African Countries.¹⁸

⁹Institute for Fiscal Studies (2024). Public investment: what you need to know. <https://ifs.org.uk/articles/public-investment-what-you-need-to-know>

¹⁰International Monetary Fund (2015). Making Public Investment More Efficient. Washington, DC.

¹¹Wegrich, K.; Hammerschmid, Kostka, G. (2017). The challenge of infrastructure. In: The Governance of Infrastructure. https://www.researchgate.net/publication/316341730_The_Challenges_of_Infrastructure

¹²Transparency International Australia (2022). The Infrastructure Corruption Risk Assessment Tool (ICRAT). <https://transparency.org.au/icrat/>

¹³International Monetary Fund (IMF) Zambia: Technical Assistance Report-Diagnostic Report on Governance and Corruption. <https://www.elibrary.imf.org/view/journals/002/2023/003/article-A001-en.xml>

¹⁴2025 Budget Speech. https://www.parliament.gov.zm/sites/default/files/images/publication_docs/2025%20BUDGET%20SPEECH%20%20FINAL.pdf

¹⁵International Monetary Fund (IMF) Zambia: Technical Assistance Report-Diagnostic Report on Governance and Corruption. <https://www.elibrary.imf.org/view/journals/002/2023/003/article-A001-en.xml>

¹⁶For example, between 2014 and 2024, the Ministry of Health recorded 120 stalled projects, according to the 2024 Auditor General Report: <https://www.ago.gov.zm/wp-content/uploads/Auditor-General-Report-for-the-Financial-Year-2024-ONLINE-PUBLICATION.pdf>

¹⁷International Monetary Fund (IMF) Zambia: Technical Assistance Report-Diagnostic Report on Governance and Corruption. <https://www.elibrary.imf.org/view/journals/002/2023/003/article-A001-en.xml>

¹⁸International Monetary Fund (2020). Chapter 1 Well Spent: How Strong Infrastructure Governance Can End Waste in Public Investment. <https://www.elibrary.imf.org/display/book/9781513511818/ch001.xml?tabs=fulltext>

In an effort to reduce economic losses and mitigate corruption risks, the Zambian Government developed Public Investment Management Guidelines,¹⁹ a General Appraisal Manual for Public Investment Projects,²⁰ and Public Investment Projects Risk Management Guidelines²¹ as tools to guide the preparation and appraisal of public investment projects.²² Furthermore, Zambia developed its first National Public Investment Management Strategy²³ in 2023, seeking to address PIM weaknesses by creating an enabling policy and legislative framework, robust coordination and governance mechanisms, clear methodological procedures and processes, enhancing capacities, and developing a public investment management information system.²⁴

However, combating corruption in the infrastructure sector requires more than improving the legal and policy framework. There is a need for effective implementation of laws and effective identification and mitigation of corruption risks and vulnerabilities.

Therefore, Transparency International Australia (TIA) developed a tool to guide stakeholders in mapping out and understanding corruption risks and identifying mitigation measures at the earliest stage of infrastructure development. The Infrastructure Corruption Risk Assessment Tool (ICRAT) assists civil society and other stakeholders in asking the right questions and holding those responsible for commissioning, selecting, and financing public infrastructure to account. It also provides a practical, readily applicable roadmap for identifying and mitigating red-flag corruption hotspots during project selection.²⁵



This report presents findings following the corruption risk assessment conducted using the ICRAT in Zambia. The report highlights governance and institutional weaknesses, corruption risks in project selection and specific red flags in the Lusaka-Ndola Dual Carriageway Project.

1. 2. Overview of the Lusaka-Ndola Dual Carriage Project

The Lusaka-Ndola Dual Carriageway Project is a major construction project in Zambia, aiming to upgrade 327 kilometres of the existing main road between Lusaka and Ndola to a dual carriageway.²⁶ The project is therefore critical to expanding the capacity of the road transport network between Zambia's capital city, Lusaka, and Ndola, the provincial capital of the copper-rich province in the north. This is because the road aims to facilitate the smooth transportation of goods and services and attract investment, as part of

¹⁹Ministry of Finance and National Planning (2023). Public Investment Management Guidelines. <https://www.mofnp.gov.zm/?wpdmpo=2023-public-investment-management-guidelines>

²⁰Ministry of Finance and National Planning (2022). General Appraisal Manual for Public Investment Projects <https://www.mofnp.gov.zm/?wpdmpo=final-general-appraisal-manual-for-public-investment-projects>

²¹Ministry of Finance and National Planning (2023). Public Investment Projects Risk Management Guidelines. <https://www.mofnp.gov.zm/?wpdmpo=public-investment-project-risk-management-guidelines>

²²Ministry of Finance and National Planning (2023). Public Investment Management Strategy. <https://www.mofnp.gov.zm/?wpdmpo=public-investment-management-strategy-2024-2026>

²³Ministry of Finance and National Planning (2024). National Public Investment Management Strategy. <https://www.mofnp.gov.zm/?wpdmpo=public-investment-management-strategy-2024-2026>

²⁴International Monetary Fund (IMF) Zambia: Technical Assistance Report-Diagnostic Report on Governance and Corruption. <https://www.elibrary.imf.org/view/journals/002/2023/003/article-A001-en.xml>

²⁵Transparency International Australia (2022). The Infrastructure Corruption Risk Assessment Tool (ICRAT). <https://transparency.org.au/icrat/>

²⁶Road Development Agency (July 18, 2025). LUSAKA-NDOLA DUAL CARRIAGEWAY WORKS PROGRESSING WELL. <https://www.rda.org.zm/?p=4289>

the Zambian Government's commitment to achieving economic transformation.²⁷



The road expansion project has been at the centre of national policy debate, not only because of its economic significance but also because of several controversies surrounding it.

In 2015, the Zambian government issued the initial call for proposals to undertake the project under a public-private partnership (PPP) model and, following procurement processes, awarded the contract to Messrs. China Jiangxi Corporation for International Economic and Technical Cooperation (CJIC) on 30th May 2017.²⁸ However, the contract sum of US\$1.245 billion drew criticism from stakeholders, including opposition political parties, which accused the government of inflating the project cost to US\$3.9 million per kilometre.²⁸

This prompted the Zambian Government to clarify in a statement that the project included additional infrastructure, including three service stations, three toll plazas, one office building, several bridges, and satellite cities, and that the road section cost was only US\$1.2 million per kilometre. Furthermore, the Government informed the public that although the call for proposals referenced a PPP model, negotiations with the preferred bidder led to a change in the financing model to Engineering, Procurement, and Construction plus Finance. Under this financing model, the Government projected it would generate about US\$3.9 billion in revenue over 17 years following the commencement of operations and cited a 15% rate of return on investment.²⁸

However, following the change of regime in 2021, Zambia terminated the contract, citing cost inflation and high financing costs. The new administration consequently embarked on a new procurement process, leading to the award of the contract under a PPP model to Messrs. Macro Oceans Investment Consortium (MOIC-LN) in February 2023.²⁹

The reduced contract sum of US\$649.98 million included US\$577.38 million in construction costs, US\$1 million in working capital, US\$1.85 million in finance costs, and US\$69.74 million in interest during the construction period.³⁰

Other Specifics of the concession agreement include a 25-year concession period, comprising 3 years for the construction phase and 22 years for operations and maintenance, with the Concessionaire directly collecting revenue through road tolls.³¹ The administration also revealed that Zambia would neither fund the project nor provide any sovereign guarantee, and would not be responsible for any road maintenance for 22 years.³²

²⁷Ministry of Infrastructure, Housing and Urban Development (June 16, 2024). LUSAKA-NDOLA DUAL CARRIAGEWAY TO FOSTER JOB CREATION. <https://www.mihud.gov.zm/?p=3124>

²⁸Government of the Republic of Zambia (October 3, 2017). MINISTERIAL STATEMENT ON THE LUSAKA/NDOLA/DUAL CARRIAGEWAY PROJECT GIVEN BY THE HON. MINISTER OF HOUSING AND INFRASTRUCTURE DEVELOPMENT, MR. CHITOTELA, MP. <https://www.parliament.gov.zm/node/6899>

²⁹Road Development Agency (August 13, 2024). 1747 EMPLOYED UNDER THE LUSAKA-NDOLA DUAL CARRIAGEWAY PROJECT. <https://www.rda.org.zm/?p=3675>

³⁰Government of the Republic of Zambia (March 7, 2023). MINISTERIAL STATEMENT ON THE UPGRADING TO DUAL CARRIAGEWAY OF THE LUSAKA TO NDOLA ROAD, INCLUDING REHABILITATION OF THE LUANSHYA-FISENGEMASANGAN ROAD USING PUBLIC-PRIVATE PARTNERSHIP. <https://www.parliament.gov.zm/node/10947>

³¹Road Development Agency (January 22, 2025). A GLANCE AT THE LUSAKA-NDOLA DUAL CARRIAGEWAY PROJECT. <https://www.rda.org.zm/?p=4034>

³²Government of the Republic of Zambia (March 7, 2023). MINISTERIAL STATEMENT ON THE UPGRADING TO DUAL CARRIAGEWAY OF THE LUSAKA TO NDOLA ROAD, INCLUDING REHABILITATION OF THE LUANSHYA-FISENGEMASANGAN ROAD USING PUBLIC-PRIVATE PARTNERSHIP. <https://www.parliament.gov.zm/node/10947>

Therefore, public debate around the project escalated when the Government later announced that the National Pensions and Scheme Authority (NAPSA), Zambia's public pension fund, planned to invest US\$300 million in the road construction project.³² In 2024, NAPSA made the investment, which accounted for about 46% of the project's cost, while the Concessionaire also sourced an additional US\$50 million, or 7.7% of the financing, from the publicly

owned Workers Compensation Fund Control Board (WCFCB).³³ While some stakeholders criticised the decision, citing the risks associated with using local pension funds to finance the project, the Government highlighted the need to ensure that local pension funds also benefited from the project.³⁴ Works on the Lusaka-Ndola Dual Carriageway Project began on 21st May 2024, after the ground-breaking ceremony officiated by President Hakainde Hichilema.³⁵

2. METHODOLOGY

Transparency International Zambia (TI-Z) conducted the corruption risk assessment on the Lusaka-Ndola Dual Carriageway Project between October 2025 and April 2026, with technical support from Transparency International Australia.

The assessment employed a qualitative approach, collecting data through key informant interviews and focus group discussions, and complemented it with desk-based research.

The research process commenced in October 2025 with an internal review of the Infrastructure Corruption Risks Assessment Tool (ICRAT),³⁶ the identification of key policy documents, and the mapping of relevant stakeholders, including the Ministry of Finance and National Planning, Public-Private Partnership Office, Zambia Public Procurement Authority, International Monetary Fund, National Council for Construction, Road Development Agency, National Road Fund Agency, the Ministry of Infrastructure, Housing and Urban Development, and the Office of the Auditor General, among others. In December 2025, TI-Z held a roundtable meeting with these stakeholders to provide background information on the ICRAT and collected preliminary information on the country context and agency Context.

Thereafter, TI-Z then conducted desk-based research to complement the findings, as some stakeholders identified key sources of information.

In January 2026, TI-Z held a follow-up focus group discussion with experts from the Ministry of Finance and National Planning and the National Council for Construction to review the process followed in selecting public infrastructure projects in Zambia and to identify specific corruption risks in the Lusaka-Ndola Dual Carriageway project. Following this meeting, the TI-Z research team conducted key informant interviews (KIIs) in Lusaka, Kabwe and Ndola, targeting officials from the Road Development Agency, the Zambia Environmental Management Agency, and local authorities. The KIIs provided deeper context to the implementation gaps and corruption risks identified during the focus group discussion. Finally, TI-Z held a validation meeting with civil society organisations (CSOs), including the Centre for Trade Policy and Development, Action-Aid Zambia, and the Civil Society for Poverty Reduction, as well as the other stakeholders who participated in the roundtable discussion, to ensure that the report accurately captured their views and all relevant policy documents.

³²Government of the Republic of Zambia (March 7, 2023). MINISTERIAL STATEMENT ON THE UPGRADING TO DUAL CARRIAGEWAY OF THE LUSAKA TO NDOLA ROAD, INCLUDING REHABILITATION OF THE LUANSHYA-FISENGEMASANGAN ROAD USING PUBLIC-PRIVATE PARTNERSHIP. <https://www.parliament.gov.zm/node/10947>

³³National Pension Scheme Authority (2024). NAPSA DIRECTOR GENERAL REMARKS DURING CONTRACT SIGNING OF LUSAKA-NDOLA DUAL CARRIAGEWAY. <https://www.napsa.co.zm/news/details?id=cdd53d1d-b4d9-43a4-8bfd-1d5911ba1b2c>

³⁴Government of the Republic of Zambia (March 7, 2023). MINISTERIAL STATEMENT ON THE UPGRADING TO DUAL CARRIAGEWAY OF THE LUSAKA TO NDOLA ROAD, INCLUDING REHABILITATION OF THE LUANSHYA-FISENGEMASANGAN ROAD USING PUBLIC-PRIVATE PARTNERSHIP. <https://www.parliament.gov.zm/node/10947>

³⁵Road Development Agency (August 13, 2024). 1747 EMPLOYED UNDER THE LUSAKA-NDOLA DUAL CARRIAGEWAY PROJECT. <https://www.rda.org.zm/?p=3675>

³⁶Transparency International Australia (2022). The Infrastructure Corruption Risk Assessment Tool (ICRAT). <https://transparency.org.au/icrat/>

3. MAIN FINDINGS

3.1 Governance and Institutional Vulnerabilities

The assessment established that Zambia had a strong electoral system, as elections were periodic, generally free and fair, and the integrity of the ballot was adequately ensured.³⁷

However, the country had no substantive law regulating political party financing, even though Article 60(4) of the Zambian Constitution provided for the regulation of political financing and election spending.³⁸ The assessment also noted elements of strong public finance and procurement systems, as well as considerable openness of the media and civil society activity.³⁹

Furthermore, the Ministry of Finance and National Planning, which is the agency responsible for public investment management, exhibited strong professionalism, a strong reputation for good leadership, openness in communication, budget transparency and community engagement.³⁹

However, the ICRA also identified key areas of concern and areas requiring further consideration. In the country context, the key areas of concern included the level of public-sector corruption, as measured by the Corruption Perceptions Index (CPI). Zambia's CPI score dropped from 39/100 in 2024 to 37/100 in 2025, underperforming countries such as Tanzania, Namibia and Botswana.⁴⁰

The analysis also indicated the prevalence of political party and tribal loyalties, or

a cultural hierarchy, which dominated business and government appointments and decisions.⁴¹

It was also notable that, though Zambia enacted the Access to Information Act No. 24 of 2023,⁴² the law had not been fully implemented, thus limiting the effectiveness of access to information.

Key areas of concern in the agency context included the lack of an accessible grievance mechanism specifically designed to address public concerns about PIM issues. Although the Ministry of Finance and National Planning had an established Integrity Committee, there were no reports on how such grievances were handled.⁴³

Zambia also experienced considerable external influence from funders and donors through the provision of development support. This came to light through the protracted negotiations between Zambia and the United States on a health financing agreement.⁴⁴

Furthermore, there were delays in reforms to strengthen the asset declaration regime. Consequently, compliance with asset declaration requirements remained low, with incomplete or unverified disclosures.⁴⁵ Therefore, the low compliance with asset-declaration requirements among public officials, coupled with limited transparency in verifiable beneficial ownership information, generated considerable conflict of interest.⁴⁶

³⁷European Union (2021). 2021 European Union Mission Report-Zambia. https://www.eeas.europa.eu/sites/default/files/eu_eom_zmb_2021_final_report.pdf

³⁸Constitution of Zambia (Amendment) No. 2 of 2016. [https://www.parliament.gov.zm/sites/default/files/documents/amendment_act/Constitution%20of%20Zambia%20\(Amendment\),%202016-Act%20No.%202_0.pdf](https://www.parliament.gov.zm/sites/default/files/documents/amendment_act/Constitution%20of%20Zambia%20(Amendment),%202016-Act%20No.%202_0.pdf)

³⁹Transparency International Zambia (2025). A Rapid Assessment on the Status of Implementation of Zambia's IMF Governance Diagnostic Recommendations. <https://tizambia.org.zm/2025/05/a-rapid-assessment-on-the-status-of-implementation-of-zambias-imf-governance-diagnostic-recommendations/>

⁴⁰Transparency International Zambia (2026). Corruption Perceptions Index 2025 Zambia Highlights Report. <https://tizambia.org.zm/2026/02/cpi-2025-zambia-highlights-report/>

⁴¹Beardsworth, N., & Mutuna, S. K. (2022). "Tribal balancing": exclusionary elite coalitions and Zambia's 2021 elections. *Journal of Eastern African Studies*, 16(4), 619-642. <https://doi.org/10.1080/17531055.2023.2233729>

⁴²The Access to Information Act No. 24 of 2023. <https://www.parliament.gov.zm/node/11547>

⁴³Focus Group Discussion with MoFNP and NCC Officials

⁴⁴Reuters (May 4, 2026). Zambia says US health deal must be uncoupled from minerals access. <https://www.reuters.com/business/healthcare-pharmaceuticals/zambia-says-us-health-deal-must-be-uncoupled-minerals-access-2026-05-04/>

⁴⁵International Monetary Fund (2026). Zambia: Sixth Review under the Extended Credit Facility Arrangement. <https://www.elibrary.imf.org/view/journals/002/2026/021/article-A001-en.xml>

⁴⁶International Monetary Fund (IMF) Zambia: Technical Assistance Report-Diagnostic Report on Governance and Corruption. <https://www.elibrary.imf.org/view/journals/002/2023/003/article-A001-en.xml>

Table 1 presents the summary of findings on the Country and agency context.

Table 1: Summary of Zambia's Context Risks

Key areas of Concern	Country Aspects	Agency Aspects
		<ul style="list-style-type: none"> Political Party/Tribal Loyalties Public Sector Corruption (CPI)
Areas to be considered further	Country Aspects	Agency Aspects
	<ul style="list-style-type: none"> Limited Access to Information (Delayed Implementation of ATI Law) 	<ul style="list-style-type: none"> Limited Declaration of Assets Gaps in Beneficial Ownership Transparency

3.2 Characteristics of the Project Selection Process

The following elements characterised the public infrastructure project selection process in Zambia:

(1) COMPREHENSIVE POLICY AND LEGAL FRAMEWORK

Zambia developed a National Infrastructure Policy,⁴⁷ and sector policies and strategies such as the Road Sector Investment Plan III,⁴⁸ National Housing Policy,⁴⁹ National Transport Policy,⁵⁰ National Energy Policy,⁵¹ and the Road Development Agency's Strategic Plan,⁵² among others. Furthermore, public investment and public infrastructure planning were guided by the Eighth National Development Plan (8NDP),⁵³ the National Planning and Budgeting Policy of 2014⁵⁴ and the National Planning and Budgeting Act No. 1 of 2020.⁵⁵ Zambia also developed a Public Investment Management Strategy that outlined the government's plan for public investment management reforms, along with several investment management guidelines, including the Public Investment Project Prioritisation and Financing Option Mapping Criteria.⁵⁶ For public-private partnership projects, such as the Lusaka-Ndola Dual Carriageway project, the Public-Private Partnership Act, No. 18 of 2023,⁵⁷ provided additional legal guidance.

(2) SHORT-TERM INVESTMENT PLANNING

Zambia had no published multi-year pipeline of major infrastructure projects.⁵⁸ Although planning considered multi-year projects, the government published the projects pipeline annually through public investment plans and annual road sector work plans. The 2026 Public Investment Plan⁵⁹ outlined the latest pipeline of public investment projects, while the Road Sector Annual Work Plan listed road construction projects.

(3) PROJECT SELECTION FROM PRIORITY LISTS

The government selected investment projects from a priority list that included preliminary budget allocations. The ministry developed the priority list of projects using sector priorities and plans. However, annual budget allocations determined the number of projects implemented by including them in the annual work plans.⁶⁰ Nonetheless, some special projects, such as those using PPP financing models, also came in the form of unsolicited proposals, which the Public-Private Partnership Department subjected to technical evaluation.⁵⁹ Notably, the Lusaka-Ndola Dual Carriage Project was a solicited proposal.²⁹

⁴⁷National Infrastructure Policy 2023. <https://www.mihud.gov.zm/nhf/wp-content/uploads/2024/05/NATIONAL-INFRASTRUCTURE-POLICY-2023.pdf>

⁴⁸Press Statement by the Minister of Information and Media on the Decisions made by Cabinet at the 1st Cabinet Meeting Held on Monday, 2nd February, 2026. <https://www.mim.gov.zm/wp-content/uploads/2026/04/cabinet-resolutions-pdf.pdf>

⁴⁹National Housing Policy. <https://www.mihud.gov.zm/nhf/wp-content/uploads/2024/05/NATIONAL-HOUSING-POLICY-NHP-2020-2024.pdf>

⁵⁰National Transport Policy. <https://dev.grz.gov.zm/motl/wp-content/uploads/2025/08/2019-National-Transport-Policy.pdf>

⁵¹National Energy Policy. https://www.moe.gov.zm/wp-content/uploads/2024/10/Zambia_The-National-Energy-Policy-2019.pdf

⁵²Road Development Agency: 2022-2026 Strategic Plan. <https://www.rda.org.zm/wp-content/uploads/2023/11/RDA-STRATEGIC-PLAN-2022-2026.pdf>

⁵³Eighth National Development Plan: 2022-2026. <https://www.cabinet.gov.zm/newsite/wp-content/uploads/2023/12/8NDP-2022-2026.pdf>

⁵⁴National Planning and Budgeting Policy. <https://www.mofmp.gov.zm/?wpdmpo=national-planning-and-budgeting-policy>

⁵⁵National Planning and Budgeting Act No. 1 of 2020. <https://www.parliament.gov.zm/node/8573>

⁵⁶Public Investment Project Prioritisation & Financing Option Mapping Criteria. <https://www.mofmp.gov.zm/?wpdmpo=public-investment-project-prioritisation-financing-option>

⁵⁷Public Private Partnership Act No. 18 of 2023. <https://www.parliament.gov.zm/node/11541>

⁵⁸Focus Group Discussion

⁵⁹2026 Public Investment Plan. <https://www.mofmp.gov.zm/?wpdmpo=2026-public-investment-plan>

(4) COMPREHENSIVE PROJECT APPRAISAL

In line with the 2023 Public Investment Management Guidelines⁶¹ and the 2022 General Appraisal Manual,⁶² each project appraisal considered three viable alternatives, and the ministry conducted economic evaluations for each public investment project. Furthermore, the guidelines also provided for preliminary design, economic analysis, and environmental and social impact analysis.⁶³ The Lusaka-Ndola Dual Carriageway project was therefore subjected to a comprehensive appraisal and evaluation process. This process included an evaluation of the proposals and negotiations with the preferred bidder.³⁰

(5) LEGALLY MANDATED EIAs

Although not publicly available at the time, the Lusaka-Ndola Dual Carriageway project underwent an environmental impact assessment, which included public consultations,⁶⁵ as required under the Environmental Management Act No. 12 of 2011.⁶⁶ Zambia later strengthened the legal framework for conducting EIAs through the enactment of the Environmental Management Act No 8 of 2023,⁶⁷ and the development of the Environmental Management (Environmental Impact Assessment) Regulation 2026.⁶⁸

(6) SOCIAL BENEFIT CONSIDERATIONS

During the project approval stage, the cost estimates and the project's economic viability were reviewed, while impacts and mitigation measures were assessed as part of the EIA. However, some projects were approved based on high social benefits even when economic viability was low.⁶⁹ As a PPP-implemented project, the Lusaka-Ndola Dual Carriageway underwent a comprehensive review of cost estimates and economic viability before approval,⁷⁰ as this was a critical aspect of the feasibility study. The PPP project

approval process required a feasibility study before the procurement and negotiation stages.⁷¹

3.3 Corruption Red-Flags at Project Level

The ICRAT assessment also considered specific project vulnerabilities and corruption red flags in the Lusaka-Ndola Dual Carriageway Project. The following were the major corruption red flags in the project:

(1) UNPUBLISHED FEASIBILITY STUDY

Although Stakeholders indicated that a feasibility study was conducted for the Lusaka-Ndola Dual Carriageway project,⁷² the study was not publicly available. This means the public was left to rely on fragmented information about critical aspects of the project, such as its financing model. The main sources of information on the Lusaka-Ndola Dual Carriageway Project included ministerial statements³⁰ and websites of public entities such as the Road Development Agency.⁷⁴ This non-publication of feasibility studies was a common feature of public investment and infrastructure management in Zambia, even though the Zambian Government published the terms of reference for the feasibility studies on the 45km Lusaka to Chongwe Dual Carriageway Upgrade.⁷⁵

(2) INACCESSIBLE ENVIRONMENTAL IMPACT STATEMENTS

The Zambia Environmental Management Agency (ZEMA) indicated that an environmental impact statement (EIS) was conducted on the Lusaka-Ndola Dual Carriageway Project and published on their website.⁷⁶ However, a detailed review of their website⁷⁷ established that the EIA was not publicly accessible. Nonetheless, it was notable that environmental impact statements on public investment projects, including road construction projects, were published regularly on the website.⁷⁸

⁶⁰Focus Group Discussion

⁶¹2023 Public Investment Management Guidelines. <https://www.mofnp.gov.zm/?wpdmpo=2023-public-investment-management-guidelines>

⁶²2022 General Appraisal Manual for Public Investment Projects. <https://www.mofnp.gov.zm/?wpdmpo=final-general-appraisal-manual-for-public-investment-projects>

⁶³Focus Group Discussion

⁶⁵Key Information Interview with the Zambia Environmental Management Agency (ZEMA)

⁶⁶Environmental Management Act No. 12 of 2011. <https://www.parliament.gov.zm/node/7348>

⁶⁷Environmental Management Act No 8 of 2023. <https://zambia.ii.org/akn/zm/act/2023/8/eng@2023-08-17v>

⁶⁸Environmental Management (Environmental Impact Assessment) Regulation 2026. <https://www.zema.org.zm/docs/statutory-instrument-no-3-of-2026-the-environmental-management-environmental-impact-assessment-regulations-2026/>

⁶⁹Focus Group Discussion

⁷⁰Focus Group Discussion

⁷¹Cabinet Office-Zambia (2024). Insights on Public private partnerships in Zambia - cabinet office. <https://www.cabinet.gov.zm/ndc/wp-content/uploads/2024/03/PPPs-in-Zambia-National-Decentralisation-Conference-MARCH-2024-4.pptx>

⁷²Focus Group Discussion

⁷⁴Road Development Agency (August 13, 2024). 1747 EMPLOYED UNDER THE LUSAKA-NDOLA DUAL CARRIAGEWAY PROJECT. <https://www.rda.org.zm/?p=3675>

⁷⁵Road Development Agency (2026). HIGH-LEVEL PPP VIABILITY ASSESSMENT FOR THE UPGRADING TO DUAL CARRIAGEWAY OF 45KM OF T4 FROM LUSAKA (JUNCTION TO THE KKIJA) TO CHONGWE. <https://www.rda.org.zm/wp-content/uploads/2026/04/ToRs-for-Viability-study-of-PPP-darft-final-12.03.26-clean.pdf>

⁷⁶Key Informant Interview with ZEMA

⁷⁷ZEMA (2026). Home. <https://www.zema.org.zm/>

⁷⁸ZEMA (2026). Environmental Impact Statements. <https://www.zema.org.zm/docs-category/environmental-impact-statements/>

(3) NON-DISCLOSURE OF CONCESSION AGREEMENT

Even though many aspects of the project were known,⁷⁹ the concession agreement for the Lusaka-Ndola Dual Carriageway project, which includes sensitive terms and conditions, was also not publicly available. Furthermore, local civil society actors noted a lack of transparency and participation in PPP negotiations. Given this lack of transparency and broader participation, it remained unclear how the toll road fees were to be collected and used.⁸⁰ This was characteristic of the general lack of contract transparency in Zambia, with examples including the

process of negotiating a new health aid agreement with the United States.⁸¹

Transparency International Zambia (TI-Z) employed the ICRAT to assess corruption risks in the Lusaka-Ndola Dual Carriageway Project. Using a qualitative research design, the assessment sought to identify governance and institutional weaknesses, corruption risks in project selection and specific red flags during the project selection phase. The assessment was conducted between October 2025 and April 2026, with technical support from Transparency International Australia.

⁷⁹Kabaso, G. (n.d.) The State of PPPs in Zambia and Zeroing in on the Lusaka-Ndola Road. https://pswatch.csopartnership.org/?jet_download=b7a81c0f83eda218b8b68843dc00176623219a2f

⁸⁰ActionAid Zambia. (2023, March 7). Press Statement - Public Private Partnership Should Benefit Zambians. <https://zambia.actionaid.org/stories/2023/pressstatement-public-private-partnership-should-benefit-zambians>

⁸¹News Diggers (2026, April 11). CSOs petition court over govt's failure to table Zambia US health deal. <https://diggers.news/local/2026/04/11/csos-petition-court-over-govts-failure-to-table-zambia-us-health-deal/>

4. MITIGATION MEASURES AND RECOMMENDATIONS

The assessment found strong governance aspects and progressive agency characteristics. These included strong public finance and procurement systems, openness to the media and civil society, strong professionalism, and a good reputation for leadership within the Ministry of Finance and National Planning. However, the ICRAT also identified key areas of concern and areas requiring further consideration. In the country context, the key areas of concern included the level of public-sector corruption, as measured by the Corruption Perceptions Index (CPI), and the prevalence of political party and tribal loyalties, which dominated business and government appointments and decisions. The major areas requiring further consideration included the level of external influence and the lack of an accessible grievance mechanism.

Furthermore, the project-level assessment found that the lack of transparency regarding key project features was the major corruption risk. The concession agreement, feasibility study, and environmental impact statement for the Lusaka-Ndola Dual Carriageway Project were not publicly accessible. This corruption risk was exacerbated by the limited participation of non-state actors in negotiating such agreements, especially given external influence, limited asset declarations, and gaps in beneficial ownership, which were identified as areas requiring further consideration in the governance assessment. In light of the assessment, Transparency International Zambia recommends the following mitigation measures:

Table 2: Priority Recommendations/Mitigation Measures

Stakeholder	Priority Recommendation	Timeline
Ministry of Justice and Cabinet Office	<ul style="list-style-type: none"> Strengthen the asset declaration regime by developing comprehensive legislation that will enable all public officials to periodically and consistently declare their assets and liabilities 	Medium-term
Public-Private Partnership Department	<ul style="list-style-type: none"> Enhance transparency on PPP-model financed projects and non-state actor participation in the negotiation process. 	Medium-term
Ministry of Finance and National Planning	<ul style="list-style-type: none"> Develop a publicly accessible grievance mechanism and periodically report on the status of handling complaints relating to public investment and public infrastructure management 	Short-term
	<ul style="list-style-type: none"> Expand the planning and publication horizon for public investment projects to ensure public access to multi-year pipelines of projects 	Short-term
Anti-Corruption Commission (ACC)	<ul style="list-style-type: none"> Promote integrity through Institutionalising asset and conflict-of-interest declarations and mainstreaming integrity tools, as outlined in the National Policy on Anti-Corruption. 	Medium-term
Ministry of Information and Media & Human Rights Commission	<ul style="list-style-type: none"> Increase technical and financial resources to accelerate the operationalisation of the Access to Information Act No. 24 of 2023. This will ensure public access to relevant information, including key documents on infrastructure projects, such as feasibility studies, environmental impact statements and concession agreements. 	Medium-term
Road Development Agency	<ul style="list-style-type: none"> Enhance consultations with key stakeholders such as the Ministry of Local Government and Rural Development, and local authorities, during the implementation of national-level road construction projects 	Immediate
Patents and Companies Registration Agency (PACRA)	<ul style="list-style-type: none"> Improve access to actual beneficial ownership information through enhancing the beneficial ownership registers and eliminating charges 	Short-term
Civil Society Organisations and Cooperating Partners	<ul style="list-style-type: none"> Increase non-state actor participation in public contract negotiations Increase advocacy and public sensitisation on contract transparency, public investment and public infrastructure management in Zambia. 	Immediate

Note: The recommendations classified as Immediate are for implementation in up to 6 months, those classified as Short-Term are for implementation in 6 to 12 months, and those classified as Medium-Term may require up to 2 years, while those classified as Long-Term may require up to 4 years to implement.







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