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## Not a Silver Bullet: The push for assessed contributions for African-led peace support operations

### About the Author

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The United Nations (UN) secretary-general has revitalized the stalled effort to provide African-led peace support operations with access to UN assessed contributions through his call for a new generation of peace enforcement operations led by regional forces, with guaranteed, predictable funding. The push to provide African-led peace support operations with access to UN assessed contributions is both a political signal of support for the African Union (AU) partnership as well as an opportunity to enhance the effectiveness of African-led operations. As such, it is important for the deliberations in the Security Council on financing to take technical issues into account to ensure that expectations are properly managed and that any decision taken by the Security Council leads to a more effective approach to responding to peace and security challenges in Africa.

This paper, which should be read in conjunction with the [2023 report of the Secretary-General on considerations related to the financing of AU peace support operations](#), focuses specifically on technical questions relevant to the use of assessed contributions. Access to assessed contributions can enhance the effectiveness of African-led<sup>1</sup> peace support operations (PSOs) by providing more adequate, sustainable, and predictable funding. However, access to UN-assessed contributions is not a silver bullet because UN support arrangements are not optimized for African-led PSOs and because certain types of support are only appropriate for certain types of PSOs. Moreover, assessed contributions come with drawbacks that may erode the comparative advantage of African-led PSOs in rapid response.

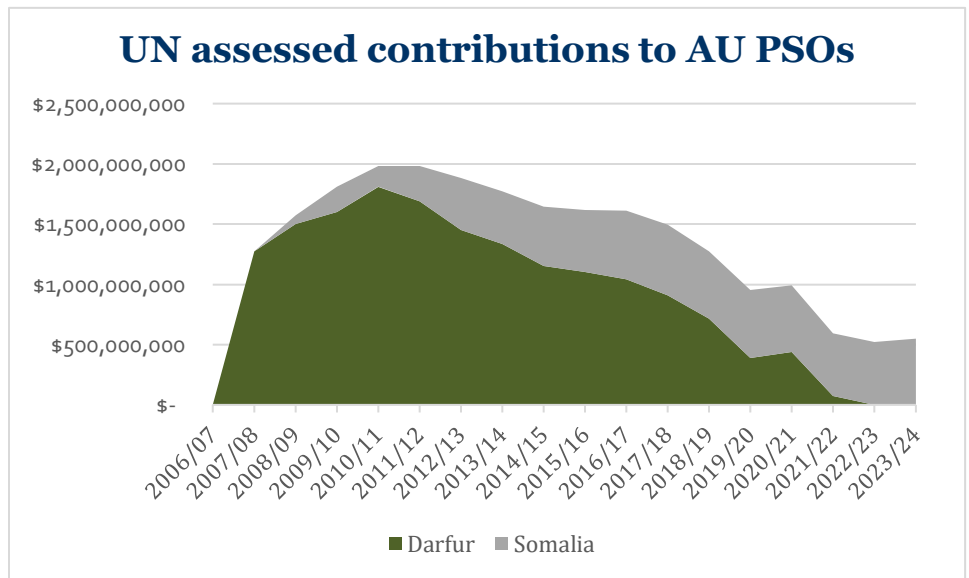
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<sup>1</sup> This paper uses “African-led” PSOs as an umbrella term encompassing all types of PSOs enumerated in the 2021 AU Doctrine on Peace Support Operations, namely AU PSOs, AU-authorized PSOs, AU-endorsed PSOs, and AU-recognized PSOs.

## Background

African-led PSOs are part of the toolkit available to the Security Council for responding to conflict in Africa, alongside the full range of available UN mechanisms. As [noted](#) by the AU, the comparative advantage of PSOs is “in responding rapidly to some of the most complex and challenging crises in Africa.” Although there has been an increased appetite in recent years for deploying African-led PSOs, the AU remains heavily reliant on external partners—particularly the European Union (EU)—to finance its peace and security activities. In 2015, the AU Assembly of Heads of State and Government [decided](#) that AU member states should enhance their ownership over the AU budget by, inter alia, financing 25 percent of the peace and security budget over a five-year period. In 2016, the AU Assembly [further decided](#) to revitalize the AU Peace Fund with a funding target of USD 400 million by 2020. Although progress has been made, neither target has been met. In the interim, the Security Council has on several occasions provided AU missions with exceptional access to UN assessed contributions, including in the case of the UN-AU Hybrid Operation in Darfur (UNAMID), which was financed as UN peacekeeping operation, and the UN logistical support package for the AU Mission in Somalia (AMISOM) and its successor, the AU Transition Mission in Somalia (ATMIS).

Chart 1: UN assessed contributions for UNAMID, UNSOA, and UNSOS



To date, the costs of AU PSOs have not been systematically included in the AU peace and security budget as the costs of AU PSOs have been borne by their respective troop-contributing countries and partners such as the EU. In 2016, the AU High Representative for the Peace Fund, in developing his [proposals for the AU Peace Fund](#), arrived at the USD 400 million target by including the costs

of AU PSOs—with the exception of AMISOM, which had its own financing arrangements—as part of the overall envelope of AU peace and security activities to be funded at least in part by the AU. The proposal included three funding windows, of which one window was for AU PSOs; of these, those authorized by the Security Council were to be financed through a combination of AU member state contributions, UN assessed contributions covering 75 percent of requirements, and non-AU bilateral contributions. The AU Assembly [endorsed](#) the recommendations of the High Representative in July 2016. The 2015 and 2016 AU Assembly decisions are the basis of the concept for the 25-75 split between the AU and UN in the costs of AU PSOs.

Since 2018, however, the AU’s commitment to financing its own PSOs has softened. In February 2023, the [AU Assembly adopted](#) a “[consensus paper](#)” arguing that AU peace support operations “are a global good undertaken on behalf of the UN Security Council, which has the primary responsibility for the maintenance of international peace and security. Accordingly, in instances where the UN authorizes the AU to undertake a peace support operation in lieu of the UN, the UN should provide the means to undertake such missions.” The consensus paper frames the 25 percent contribution of the AU to its PSOs as representing the “preparation stage of AU-led PSOs especially effective assessment, planning, and readiness for efficient mandate implementation.” Under UN budget processes applicable to the financing of activities under UN assessed contributions, such costs are part of the responsibilities of staff at headquarters and are not included in the budgets of peace operations. As such, the AU consensus paper in effect argues that the AU should not be responsible for the costs of its PSOs and that the UN should instead bear these costs.

## Article 17 of the UN Charter and the role of the Security Council

At the heart of the current AU argument in favor of gaining access to UN assessed contributions is the claim that—because the AU is operating on behalf of the Security Council—the Security Council is obligated to provide the resources required to deliver the mandate when it authorizes the AU to deploy a PSO under a chapter VIII mandate. However, the Security Council has no legal obligation to ensure the financing of activities it mandates. The Security Council has been authorizing the activities of ad hoc coalitions and regional organizations since the 1950s, with the establishment of the UN Command in Korea, without providing any authorization of financing through assessed contributions. In more recent examples of Security Council-authorized missions, such as the Kosovo Force mission in Kosovo and the ISAF mission in Afghanistan, the missions and their contingents were self-funded. In fact, the absence of a systematic mechanism for financing such activities through UN assessed contributions prompted Secretary-General Kofi Annan to propose, in

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The Security Council has no legal obligation to ensure the financing of activities it mandates.

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his 2005 report [In Larger Freedom](#), that “the rules of the United Nations peacekeeping budget be amended to give the United Nations the option, in very exceptional circumstances, to use assessed contributions to finance regional operations authorized by the Security Council.” This, however, was not endorsed by member states in the [2005 World Summit outcome](#).

A related question that occasionally surfaces around deliberations on AU financing is whether the Security Council is even the appropriate main organ of the UN to pronounce on eligibility for assessed contributions. After all, Article 17(1) of the UN Charter assigns responsibility over budgetary questions to the General Assembly, and Article 17(2) states that “the expenses of the Organization shall be borne by the Members as apportioned by the General Assembly.” In fact, a general division of responsibilities has emerged since the 1990s in which the Security Council decides whether an activity it mandated should be funded through assessed contributions while the General Assembly decides (1) the level of appropriation, (2) whether to establish a separate account, and (3) the applicable scale of assessment.<sup>2</sup> The Security Council can also specify when UN support for such activities should be funded through voluntary contributions. Recent examples of the Council proscribing access to UN assessed contributions include its decisions on support to the [Multinational Security Support mission in Haiti](#) and the [G5 Sahel Joint Force](#).

The general acceptance of this division of responsibility is reflected in intergovernmental decisions related to UN support to AMISOM. The General Assembly raised no objections to the three resolutions adopted by the Security Council regarding the provision of various types of support to AMISOM through assessed contributions, namely the [authorization of a UN logistical support package](#) in 2009, the [payment of reimbursement for major equipment](#) in 2012, and the payment of [reimbursement for certain categories of self-sustainment](#) in 2015. Following each of the three Security Council resolutions, the General Assembly adopted financing resolutions appropriating resources financed as assessed contributions without questioning the role of the Security Council.

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<sup>2</sup> In 1993, the Security Council decided that the expenses of the International Tribunal for the Former Yugoslavia and the costs of the UN Peacekeeping Force in Cyprus should be treated as expenses of the Organization under Article 17(2) of the UN Charter and therefore to be paid through assessed contributions. This, however, prompted concern on the part of the General Assembly “that advice given to the Security Council by the Secretariat on the nature of the financing of the Force did not respect the role of the General Assembly as set out in Article 17 of the Charter.” Despite the concerns raised by the General Assembly, the Security Council decided the following year that the expenses of the International Tribunal for Rwanda shall be expenses of the Organization in accordance with Article 17 of the Charter. In responding to questions related to the financing of the Tribunal, the secretary-general explained in 1995 that “in clearly distinguishing between the competence of the Security Council to establish the International Tribunal and the budgetary authority of the General Assembly to decide on its financing, the Security Council did not pronounce itself on the mode of financing, i.e., regular budget or a special account.”

## Key considerations regarding the use of assessed contributions

The deliberations over the financing of AU PSOs have been complicated by a lack of clarity over the scope of the PSOs to be covered as well as what exactly is meant to be covered by UN assessed contributions. Both questions have important financial, operational, and political implications.

### *Typology of missions*

There are many approaches to developing a typology for AU PSOs. One approach is the division established in the 2021 revised AU PSO doctrine based on the level of AU authority and oversight over the mission. The Security Council deliberations since 2016 follow a version of this typology but use a different terminology by drawing a distinction between AU-led missions (i.e., what would be considered AU PSOs under the PSO doctrine) and other missions, such as ones led by regional economic communities or ad hoc coalitions. Although this distinction may be important in terms of political oversight, it is less relevant to determining the necessary support arrangements.

Another criterion proposed by both the AU and members of the Security Council relates to the nature of the Security Council authorization, i.e., that missions authorized under Chapter VIII of the Charter should be eligible. It is unclear why the choice of chapter should have a bearing on whether a Security Council-mandated activity should be eligible for assessed funding, especially when such decisions would be made on a case-by-case basis. After all, none of the AU PSOs that have received support through UN assessed contributions—namely the AU Mission in Sudan, UNAMID, AMISOM, or ATMIS—were mandated under chapter VIII of the Charter.

A more relevant typology would consider the nature of the mission mandate—i.e., whether it falls within the scope of peacekeeping or involves more kinetic activities such as peace enforcement—as these affect the specific support requirements a mission may have. Moreover, missions that fall into the latter category will also have challenges related to coherence in the interpretation of doctrine, rules of engagement, and command and control; they will also have elevated risks related to compliance with international human rights and humanitarian law and come with additional safety and security considerations for the UN, as the provision of material support increases the likelihood that UN personnel and premises are targeted. This is the typology used in the [2016 UN-AU joint review](#).

This paper proposes a third typology that should also be considered in connection with the nature of the mandate, namely, whether the missions are expeditionary in nature. Expeditionary missions consist of contributing countries deploying into a third country, while a second type of PSO has

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Expeditionary missions consist of contributing countries deploying abroad, while a second type of PSO has emerged in recent years in which the area of operations is coterminous with the territory of contributing countries.

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emerged in recent years in which the area of operations is coterminous with the territory of contributing countries. This distinction matters because different types of UN assessed contributions may be appropriate for the former but not the latter.

### *Financing models*

The [2017 report of the Secretary-General on options for authorization and support for African Union peace support operations](#) described four models through which AU PSOs could receive UN assessed contributions. Although the [2023 report](#) indicated that all four models remain relevant, it focused on two models—the joint mission model and the support package model—because these are models that are field-tested and for which lessons learned from past experience can be applied in future deployments.

The option of a **joint mission with the UN** is not a “UNAMID model” per se because it draws from lessons learned from the UNAMID experience. A joint mission would be managed on the basis of UN regulations, rules, policies, and procedures. Because the joint mission would simultaneously be an African-led PSO and a UN peace operation, such an option would only be appropriate for missions compatible with existing UN doctrine, which—in the case of peacekeeping operations—includes the three basic principles of consent of the parties, impartiality, and non-use of force except in self-defense and defense of the mandate. Indeed, the option of a joint UN-AU mission for the follow-on mission to AMISOM was contemplated by the independent assessment requested in Security Council resolution 2520 of 29 May 2020. This option, however, came with the caveat that “UN doctrine and guidance clearly advise against using UN peacekeeping operations for counter-terrorism and enforcement operations.”<sup>3</sup>

The General Assembly would consider the budget of a joint mission in the same manner as the budget of other UN peace operations. If the joint mission is funded from a separate account, the General Assembly may choose to finance the requirements of the missions entirely through assessed contributions or to utilize a cost-sharing arrangement similar to that used in the UN Peacekeeping Force in Cyprus in which an agreed portion of the annual funding for the mission comes from non-UN sources and the remainder is apportioned amongst member states under the applicable scale of assessment.<sup>4</sup>

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Although support can be delivered through a standalone support office, it is also possible that a support package can be delivered and funded through a UN peace operation as part of a modular approach to mission configuration.

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<sup>3</sup> United Nations. Independent Assessment of International Support to the Whole Security Environment in Somalia Post-2021 (8 January 2021).

<sup>4</sup> Under the 1993 compromise that led to the adoption of Security Council resolution 831 (1993), one-third of the annual requirements of the Force are funded through voluntary contributions by the Government of Cyprus, and a further USD 6.5 million is funded through voluntary contributions by the Government of Greece. The remainder of the requirements are apportioned amongst member states—including Cyprus and Greece—using the peacekeeping scale of assessments.

The option of a **UN-funded support package** refers to a range of activities that can be delivered on the basis of UN policies and procedures. Although support can be delivered through a standalone support office, as was the case for AMISOM and ATMIS, it is also possible that a support package can be delivered and funded through a UN peace operation—e.g., a peacekeeping operation or a special political mission—as part of a modular approach to mission configuration. Such an approach would facilitate the maintenance of a distinction between the more kinetic operations conducted by the African-led PSO and the activities of the UN mission and UN country team while also ensuring alignment between the UN and the PSO as part of a single overarching political and peacebuilding strategy. Indeed, such an approach would be in line with the recommendation of the secretary-general, in his [policy brief on A New Agenda for Peace](#), that “peace operations be significantly more integrated and should leverage the full range of civilian capacities and expertise across the United Nations system and its partners.”

#### *Types of support that can be delivered through assessed contributions*

There are three broad types of assistance that can be provided to African-led PSOs through assessed contributions. These consist of (1) planning, administration, and logistics capacity deployed by the UN to fill capability gaps, (2) reimbursement for contingent-owned equipment, and (3) personnel reimbursement. As demonstrated in the following paragraphs, UN support and reimbursement frameworks are not optimized for African-led PSOs; this is why the secretary-general, in his 2017 report, recommended that the AU develop its own approaches to ensure that the logistics and reimbursement frameworks meet the requirements of AU operations.

The first type—**UN provision of planning, administration, and logistics capacity to fill capability gaps**—does not include the transfer of funds to the PSO or its troop- or police-contributing countries. Examples of this model include the deployment of the light and heavy support packages to the AU Mission in Sudan, [approved](#) by the Security Council in advance of the deployment of UNAMID in 2007, as well as the initial package of logistical support authorized for AMISOM in 2009.

As part of the support package delivered through the UN Support Office for AMISOM (UNSOA) and the UN Support Office in Somalia (UNSOS), UN staff have adapted the UN peace operations support framework as best they can to meet the operational requirements of AMISOM/ATMIS. This arrangement is functional but not necessarily satisfactory to all stakeholders. Both the UN and the AU have concluded that the UN support framework—which was designed for UN peace operations—and its administrative policies and procedures are not well-suited to peace enforcement. The 2021 AU-commissioned an independent assessment of AU engagement in Somalia put it bluntly, stating that the

“UNSOS Support Concept is not appropriate for the current Combat Operations conducted by AMISOM.”<sup>5</sup> In addition, the nature of operating in high-threat environments also means that the UN may need to seek alternatives to the usual approaches to delivering logistical and administrative support that [may not meet the expectations of audit and oversight bodies](#). For example, many AMISOM/ATMIS locations are not accessible to UNSOS personnel due to security restrictions; UNSOS staff, therefore, depend on contractors for the actual delivery of support to many locations and must rely on AU counterparts for information such as actual deployed troop strength instead of being able to verify the information themselves.

The second type of assistance consists of **reimbursement for contingent-owned equipment** (COE), which itself can be subdivided between major equipment—equipment required for the implementation of the mandate—and self-sustainment—equipment and services required to sustain individual units.<sup>6</sup> The current COE reimbursement system was [established in 1996](#) to standardize the reimbursement rates to troop-contributing countries for equipment and services deployed to peacekeeping missions. Reimbursement paid for major equipment is a lease paid by the UN to a contributing country for equipment mutually agreed in a memorandum of understanding; it compensates countries for the capabilities no longer available for their routine activities in national service because of their deployment to peacekeeping operations. COE reimbursement under UN assessed contributions was approved by the Security Council for AMISOM in 2012 for major equipment and in 2015 for certain categories of self-sustainment.

At the time the system came into effect, there was a recognition that [peacekeeping missions were not suited to undertake peace enforcement](#) and that the two types of mandates have different requirements with regard to their composition, armament, logistical support, and deployment. As a result, the standards, policies, and procedures for COE reimbursement assume largely static deployments in which the use of force is the exception and not the rule, though [changes in recent years](#) have lowered the threshold for reimbursement for loss or damage due to hostile action. COE reimbursement can be considered for expeditionary African-led PSOs, but it should be recognized that the existing UN COE system was not designed for peace enforcement and other types of kinetic activities. Elements currently in place that may meet the requirements of peacekeeping operations but not more kinetic activities include the procedures for reimbursement of loss or damage to COE, the calculation of the hostile

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<sup>5</sup> African Union, “Report of the independent assessment team on the African Union’s engagement in and with Somalia post 2011,” May 30, 2021, <https://s3-eu-west-1.amazonaws.com/s3.sourceafrica.net/documents/121013/AU-Report-Of-the-Independent-Assessment-Team-on.pdf>.

<sup>6</sup> These include catering, communications, office, laundry, cleaning, and tentage.



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Application of the current UN rates to African-led PSOs would not align with the principles underpinning the UN reimbursement framework because the UN rates may not reflect the actual costs incurred by AU troop-contributing countries.

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action or forced abandonment mission factor (which is weighted in such a way as to have a far lower impact than the environmental conditions factor and logistics and road conditions factor), and the performance standards for medical support. Moreover, the basic logic of the principles of verification and control for COE—in which reimbursement is limited to those items of serviceable equipment—creates a perverse situation in which contingents who engage more in kinetic activities and whose equipment consequently suffers more damage receive less reimbursement than contingents who do not actively engage. This final shortcoming of the COE system is not limited to application in peace enforcement contexts but applies in all mission settings. The General Assembly should consider ways to address this fundamental structural problem in the COE system in its next review of the framework in 2026.

The final type of assistance comes in the form of **personnel reimbursement**. It is a common misconception that personnel reimbursement represents salaries or stipends to members of military or police contingents. This is not the case, as salaries and allowances remain national responsibilities. Instead, the General Assembly [decided](#) that personnel reimbursement—which is paid to troop- and police-contributing countries—represents common and essential additional costs that contributing countries would otherwise not incur if their contingents were not deployed abroad. These costs consist of inland transportation, personal kit and equipment, pre-deployment medical costs, and allowances. Personnel reimbursement has not previously been included as part of a support package and only been paid to AU troop- and police-contributing countries in UNAMID because the mission was simultaneously a UN peacekeeping operation managed in accordance with UN administrative and financial regulations, rules, policies, and procedures.

Calls for the payment of reimbursement for AMISOM/ATMIS troops have often highlighted the disparity between the reimbursement rates paid by the UN on account of members of military and police contingents in UN peace operations and the reimbursement rates paid by the EU to AMISOM/ATMIS troop- and police-contributing countries. In fact, General Assembly decisions since the 1970s have specified that reimbursement rates should be standardized across all troop-contributing countries and that adjustments to the rates should be considered on the basis of actual costs incurred by troop-contributing countries based on periodic cost surveys. The current quadrennial review process, which was [established in 2013](#), consists of a review of common and essential additional costs submitted by a representative sample of 10 of the top 20 UN troop-contributing countries distributed across the four World Bank income categories. As such, application of the current UN rates to African-led PSOs would not align with the principles underpinning the UN reimbursement framework because the UN rates may not reflect the actual costs incurred by AU troop-contributing countries. The AU could use the same methodology used by

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the UN to determine rates of reimbursement for its PSOs based on the actual common and essential additional costs incurred by AU troop- and police-contributing countries. The common and essential costs for African-led PSOs can potentially include cost categories not covered in the UN framework.

As COE and personnel reimbursements are intended to defray the cost of expeditionary deployment of military and police contingents, they are not appropriate in PSOs operating within their contributing countries' territory. In these types of PSOs, there are no COE-related opportunity costs to be compensated as a result of deployment to the PSO because the equipment continues to be used in support of national security requirements, and there are negligible additional costs related to the deployment of personnel abroad because these personnel primarily operate within their own borders or in adjacent countries. For such missions, bilateral military and security assistance may be more appropriate than UN-provided support.

#### ***AU-managed models***

The 2017 report also envisaged the possibility that UN assessed contributions could be used as a source of funding for PSOs managed, budgeted, and financed under AU regulations, rules, policies, and procedures. In such models, the Security Council could authorize access to assessed contributions based on a cost-sharing model (e.g., the 25-75 model) with the level of UN appropriations and the applicable method of apportionment amongst UN member states determined by the General Assembly.

The Security Council could also opt against providing routine access to assessed contributions but instead authorize exceptional access to assessed contributions to fill urgent budgetary shortfalls through subventions from the regular budget. Precedents for a subvention model include financing for the Special Tribunal for Lebanon and the Special Court for Sierra Leone, which were established by the Security Council, which specified that they should be funded through assessed contributions. The standard process that has emerged for requests for subventions for these Security Council-mandated activities is for a request to be submitted through the secretary-general to the Security Council through an exchange of letters. When the Security Council has taken note of such requests (in effect a tacit endorsement), it expresses the understanding that any subvention approved from assessed contributions by the General Assembly will subsequently be reimbursed from voluntary contributions received.

#### ***Summary of support and financing options***

The following table summarizes the applicability of different types of support and financing arrangements involving UN assessed contributions that may be appropriate for different types of African-led PSOs. Based on the arguments provided in the previous section, funding through cost-sharing arrangements and subventions for PSOs with peace enforcement mandates or that operate in

the territory of their contributing countries should be limited only to the types of support appropriate for those types of missions.

Table 1: Matrix of support options with funds managed by a UN entity

	Joint mission	Support package		
		Logistics	COE reimbursement	Personnel reimbursement
Expeditionary PSO (peacekeeping)	Yes	Yes	Yes	No
Expeditionary PSO (peace enforcement)	No	Yes	Yes	No
PSO operating in territory of participating countries	No	Yes	No	No

### Implications of the shift to assessed contributions

Access to UN assessed contributions has benefits and drawbacks. The benefits are enhanced predictability and sustainability of funding, at least in theory. Two sets of considerations are important to keep in mind. First, despite the [UN financial regulations](#) and [rules](#) stipulating that contributions are payable within 30 days of receipt of an assessment letter or the start of the financial period, UN budgets—whether for the regular budget, peacekeeping operations, or tribunals—suffer from the perennial challenge of late payment of assessed contributions, including from some of the largest financial contributors, which reduces the predictability of funding. These delays mean that missions have far less cash available than the levels appropriated by the General Assembly, thus creating major [liquidity challenges](#) that have—to date—largely only been able to be managed through measures such as the deferral of payments to troop- and police-contributing countries. Second, the Security Council does not always decide whether to renew mission mandates based on progress in implementing mission mandates. Indeed, [recent trends in mission closure prompted the secretary-general to warn](#) that “the closure of a mission before a country is on a sustainable path to peace can jeopardize past investments, undermine human rights and development gains... and could be more costly to the international community in case of a relapse into conflict.” As such, the sustainability of assessed contributions is not guaranteed.

Access to UN assessed contributions can also come with significant costs, including time-consuming budget preparation processes, [micromanagement](#) from the Advisory Committee on Administrative and Budgetary Questions (ACABQ) and the Fifth Committee of the General Assembly, as well as

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Access to assessed contributions comes with strings attached, including the political oversight of the Security Council as well as the financial oversight of the General Assembly through the onerous ACABQ and Fifth Committee review and approval processes.

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additional performance reporting and audit requirements. While the AU may be able to be insulated from some of these processes when the UN manages assessed contributions through a joint mission or a support package model, the use of the cost-sharing model or subvention approach in an African-led mission would require direct engagement with the General Assembly and the ability of the AU Commission or relevant sub-regional body to prepare budget documents at the level of detail expected by the ACABQ and Fifth Committee.

### Conclusion

UN assessed contributions are attractive because of the promise of more predictable and sustainable funding than the status quo. However, UN assessed contributions—whether in the form of filling capacity gaps or reimbursement to troop-contributing countries—may not be appropriate for all African-led PSOs depending on their nature and mandates. Moreover, the UN is only able to provide support and reimbursement using the frameworks currently available to support its own peace operations, which are mandated and deployed on the basis of planning assumptions that can be very different from PSOs, especially ones mandated to engage in peace enforcement and other activities of a more kinetic nature. Ultimately, African-led PSOs are best served by support and reimbursement frameworks designed for their operational requirements.

The AU consensus paper stresses the importance of African ownership of its peace and security activities. However, access to assessed contributions comes with strings attached, including the political oversight of the Security Council and the financial oversight of the General Assembly through the onerous ACABQ and Fifth Committee review and approval processes. Avoiding overreliance on UN assessed contributions is therefore important not only to preserve the flexibility and rapid response that constitutes much of the comparative advantage of African-led PSOs, but also to reflect principles of African ownership and leadership for PSOs operating within the African continent.

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