



AFGHANISTAN

Infrastructure Transparency Index 2021 Report



About this report

The Infrastructure Transparency Index (ITI) is an instrument of CoST, the Infrastructure Transparency Initiative, that measures levels of transparency and the quality of processes related to public infrastructure at both national and sub-national levels. Collaboratively designed and based on international good practice and lessons learned, its objective is to provide stakeholders with quality information that serves to promote transparency and improve the management of public infrastructure.

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DISCLAIMER

This report presents the results of an evaluation of transparency in the infrastructure sector with the objective of providing inputs for strengthening public institutions. Like other evaluation instruments, its impact depends on the use to which it is put. This is not an instrument to evaluate corruption, nor an instrument of organisational audit, nor an instrument of perception. It does not evaluate public officials, nor does it measure the general quality of procuring entities' websites. The results in this document do not represent the opinion of CoST regarding the administrative work of governments or procuring entities.

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Executive summary

Afghanistan has the laws but not the infrastructure to deliver them. The legal framework scores 79.5. Actual disclosure scores 16.4. That gap is the entire story. The legal framework for access to information is strong. Delivery of that right in practice, above all the actual disclosure of infrastructure project data, is weak. This gap is the report's defining finding.

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procuring entities disclose nothing at all.

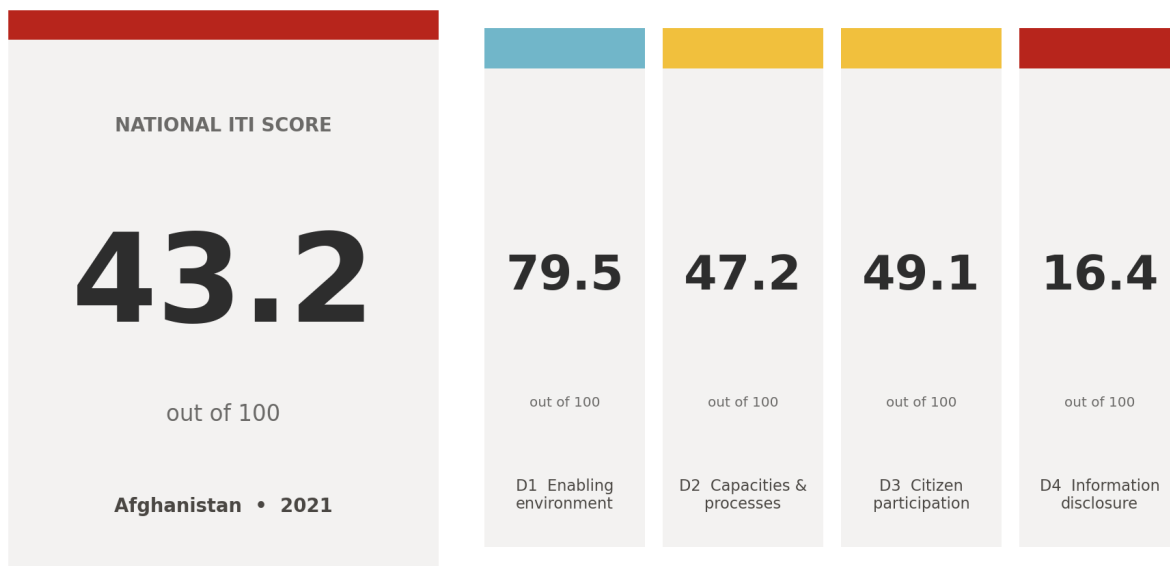
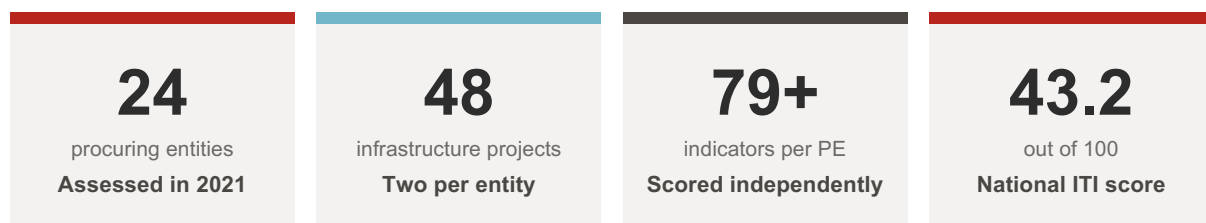


Figure 1. National ITI score and the four underlying dimension scores (Afghanistan, 2021).

WHAT THE SCORE SAYS

The enabling environment is the bright spot. Afghanistan's access to information law, procurement law, and public financial management law together score 79.5 out of 100. The legal right to information exists and is enforceable.

Procuring-entity capacities and processes score 47.2. Institutional procedures and digital capacities are uneven across the 24 entities. Provincial municipalities and smaller autonomous bodies lag far behind the large central ministries.

Citizen participation scores 49.1. Most entities recognise the importance of public engagement but lack a legalised structure or policy to institutionalise it.

Information disclosure scores 16.4 out of 100. This is where the system fails. The national disclosure platform, AGEOPS, publishes contract-level data only. Project-level data (project identification and project preparation) is not disclosed by any of the 24 assessed entities. Seven entities, including all four provincial municipalities outside Kabul, disclose nothing at all.

THE CRITICAL FINDING

The disclosure dimension (D4) scores 16.4 out of 100. Of the seven data categories required at project and contract level, only one (execution contract implementation) scores above 40 points. Project identification, project preparation, supervision contract procurement, and supervision contract implementation all score zero across every procuring entity.

The legal mandate to publish exists. The infrastructure to publish, a centralised and structured disclosure system aligned to CoST IDS or OC4IDS, does not.

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Chapter 1 | Infrastructure Transparency Index

The Infrastructure Transparency Index is a diagnostic tool. This chapter defines what it measures and why.

1.1 Concept

CoST has developed the Infrastructure Transparency Index (ITI) as a national or sub-national evaluation instrument to measure levels of infrastructure transparency and the quality of the associated processes that improve participation and accountability. It aims to help stakeholders from government, the private sector, and civil society understand the relative strengths and weaknesses of transparency, participation, and accountability within the sector. It has been designed collaboratively and is based on international good practice and lessons learned.

In its design, the ITI interprets transparency in a broad and practical sense, not only through the traditional lens of access to information, but also by considering associated enablers and capacities. These include citizen participation that leads to the creation of public value through access to information.

CoST, the Infrastructure Transparency Initiative, works with governments, the private sector, and civil society to improve transparency, participation, and accountability in public infrastructure investment. It achieves this by disclosing, validating, and using infrastructure data at each stage of the project cycle. CoST's experience indicates that this provides the evidence and process to drive reforms that reduce mismanagement, inefficiency, and corruption, and improve sector performance. Applying this approach results in cost savings, helps close the infrastructure financing gap, and delivers better quality infrastructure for millions of people.

Afghanistan joined the Infrastructure Transparency Initiative (CoST) in 2013 through the Ministry of Economy, based on a recommendation from the Joint Anti-Corruption Monitoring and Evaluation Committee (MEC). CoST Afghanistan is led by a Multi-Stakeholder Group (MSG), administered by a national secretariat which officially commenced in 2016.

The final ITI score for each procuring entity is obtained from the weighted sum of four constituent dimensions:

- Enabling environment
- Capacities and processes
- Citizen participation
- Information disclosure

Although the ITI was designed for CoST members to evaluate and strengthen their national or sub-national programmes, other interested parties can also use it as a tool to strengthen their institutions.

1.2 Objectives

The aim of the ITI is to assess the level of transparency and accountability in public infrastructure over time. The objectives are:

- To assess the state of infrastructure transparency and the capacity to improve transparency among procuring entities at national or sub-national level.
- To track and encourage progress and facilitate peer learning, while helping to hold procuring entities to account.
- To raise awareness of transparency at the national and international level, building on existing data standards such as the CoST IDS and OC4IDS.

The tool calculates a transparency score on a scale of 0 to 1 for a country's national or sub-national public infrastructure, as well as for each of its procuring entities. The scores are based on a large number of unique indicators. These are independently evaluated to assess procuring entity practices and the national or sub-national conditions that give rise to transparency and accountability in the local infrastructure sector.

The score is published in the form of an index that ranks procuring entities and provides a national or sub-national assessment. By identifying shortcomings in existing practice, an agenda can be developed to raise transparency and accountability standards within the country or sector and improve ongoing infrastructure management practices.

1.3 Principles

The ITI is based on the following principles:

- **Relevance.** Offers information about the state of the legal framework, institutional capacities, and disclosure of information to improve infrastructure project administration and implementation.
- **Comprehensiveness.** Uses a comprehensive set of indices that allows for a broad assessment of the sector and an in-depth evaluation of a procuring entity.
- **Simplicity and trustworthiness.** The methods for collecting and processing data are simple, so the results are readily understood and can be used by different stakeholders.
- **Replicability and objectivity.** Any person replicating the ITI methodology will be able to obtain the same results as presented in formal reports.

Further characteristics of the ITI are as follows:

- **Impartial.** The coordination of the ITI methodology and its implementation is undertaken through an independent third party with relevant expertise.
- **Periodic.** The evaluation is typically performed annually to offer time between evaluations to improve transparency, accountability, and management of infrastructure delivery.
- **Accurate.** The indicators are determined using primary sources of information stemming from national websites and surveys of key public officials.
- **Specific.** The score for each indicator is determined against a single piece of information. This piece of information is not re-used to determine the score of other indicators.

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- Informative. The results offer a snapshot of assessed procuring entities, which shed light more broadly on the national or sub-national situation.
 - Evolving. The number of procuring entities assessed will grow in time to offer a more complete representation of the national or sub-national context. The ITI is expected to be reviewed and updated after some years to ensure it continues to offer relevant guidance for transparency in public infrastructure.
 - Constructive. The ITI can help stakeholders compare the level of transparency of procuring entities and monitor how this changes over time. At this stage, the ITI is not intended to compare countries as the methodology does not take into account contextual factors and it allows for some decisions that may lead to a slightly different approach being taken. CoST plans to use lessons from the initial application of the ITI to allow for country comparisons at a later stage of development.

As with other measuring instruments, the impact of an ITI evaluation depends on the extent to which its results are used by those responsible for decision making.

1.4 Structure and content

The Infrastructure Transparency Index is made up of four building blocks known as dimensions:

- Enabling environment.
- Capacities and processes.
- Citizen participation.
- Information disclosure.

The first dimension evaluates the national or sub-national context with its legal framework. The other three evaluate the capacities and transparency outcomes at the procuring entity level. Together, the four dimensions align with empirical studies that describe how the quality of procurement outcomes depends on a combination of the regulatory framework and institutional capacities.

Each of the four dimensions is divided into a series of components to allow for their comprehensive evaluation. The result is a four-level hierarchy: dimensions are formed by variables, which are made up of sub-variables, which in turn are composed of indicators (see Figure 2).

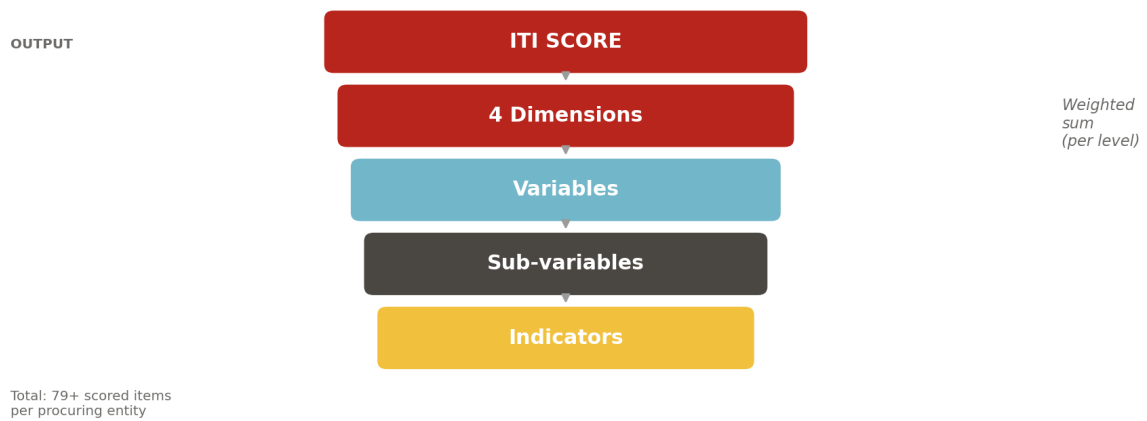


Figure 2. ITI hierarchy. Indicator scores roll up through a four-level weighted structure.

All indicators are individually evaluated and scored. A set of weighted indicator scores then gives a sub-variable score; a set of weighted sub-variable scores gives a variable score; and a set of weighted variable scores gives a dimension score. A national or sub-national ITI score is finally obtained from the weighted sum of the four dimension scores.

THE FOUR DIMENSIONS

Dimension 1 | Enabling environment

Dimension 1 assesses national or sub-national conditions enabling transparency for the infrastructure sector, considering the regulatory framework and centralised digital tools. It has one variable, three sub-variables, and 12 indicators. The variable and sub-variables are: legal framework and digital tools; access to public information regulatory framework; transparency standards in the public infrastructure sector; national digital information tools.

All indicators of this dimension are national or sub-national and are measured once at the country or local level, irrespective of the number of procuring entities selected for evaluation. Its results offer feedback to strengthen the national or sub-national environment, not processes within institutions. The score is obtained through the weighted sum of the underlying indicators. The indicators are evaluated using information typically available from online sources such as websites containing national regulatory frameworks and information linked to the sector, including transparency, public procurement, public infrastructure, and public finances.

Dimension 2 | Capacities and processes

Dimension 2 assesses the soundness of procuring entities' procedures and capacities to disclose data and information. It has two variables, five sub-variables, and 25 indicators. The variables and sub-variables are: institutional capacities (basic knowledge, digital capacities); institutional processes (procedures to disclose information, enablers and barriers to disclose information, control over infrastructure projects disclosure).

All indicators in this dimension evaluate procuring entities, not national or sub-national conditions. The indicators are evaluated once in each selected procuring entity. The results offer feedback to strengthen capacities and processes at the procuring entity level. The score is obtained through the weighted sum of the underlying indicators for each procuring entity.

Dimension 3 | Citizen participation

Dimension 3 assesses participation opportunities and the use of information by citizens. It evaluates each procuring entity, not the national environment. The indicators examine whether institutionalised citizen participation exists, whether participation opportunities are inclusive, and how infrastructure information is actually used by the public and internally by the entity.

Dimension 4 | Information disclosure

Dimension 4 assesses the amount of data and information disclosed by the procuring entities according to the CoST Afghanistan Infrastructure Data Standard or the OC4IDS in the AGEOPS system. Its indicators were measured through desktop research. These indicators required two or three evaluators. The quality of the collected data came from the same method, where a single observation was always obtained through independent evaluation by two different people.

Chapter 2 | Methodology

This chapter describes how the 2021 Afghanistan assessment was conducted — 24 procuring entities, 48 projects, and 79 indicators.

2.1 Evaluation process

Data collection ran from February to May 2021, before the political transition in August 2021. Fieldwork was coordinated with Public Information Officers at each procuring entity under Afghanistan's Access to Information Law.

The research team comprised three evaluators including the Evaluation Coordinator. To ensure consistency and reliability, all indicators of Dimension 1 and Dimension 4 were evaluated by two evaluators, with disagreements resolved through a third review. Dimensions 2 and 3 were collected through face-to-face interviews with the Public Information Officer (PIO) of each procuring entity. The interview-based approach was chosen over self-assessment to increase reliability and credibility, and to allow direct verification of supporting documents and evidence.

For provincial municipalities outside Kabul, interviews were conducted online via Zoom where travel was not feasible. In every interview, at least two research team members were present so that scoring could be reviewed in real time and corroborated against documentation submitted by the entity.

2.2 Data collection

DESKTOP RESEARCH

The ITI manual proposes two methods for data collection: desktop research and interview. Dimension 1 and Dimension 4 were assessed through desktop research. For Dimension 1, the existence of a legal framework for transparency and accountability was examined; the Access to Information Law was studied and scored as the national framework for access to information. For Dimension 4, the National Procurement Authority (NPA) requires procuring entities to publish infrastructure project information through the Afghanistan Government Electronic Open and Procurement System (AGEOPS). In consultation with CoST international experts, the research team treated AGEOPS as the sole evaluation source for project-level disclosure; information published on individual ministry websites was not considered.

PROCURING ENTITY SURVEY

Dimensions 2 and 3 were collected via face-to-face interviews with PIOs of the 24 infrastructure-related procuring entities. All indicators were converted to interview questions and administered through structured questionnaires. Supporting documents and evidence were requested for indicators where the score depends on the existence of formal documentation. Under the Access to Information Law, public information officers are obliged to be aware of the legal framework in the field of access to information and to provide the required information, particularly on infrastructure projects, to those who request it.

Table 1. Interviewees by procuring entity.

No.	Interviewee	Entity	Position
1	Mir Haseb Ahmad Fazil	Ministry of Rural Rehabilitation and Development (MRRD)	Public Information Officer
2	Hanif Farzan	Ministry of Higher Education (MoHE)	Public Information Officer
3	Aliakbar Rustami	Ministry of Agriculture, Irrigation and Livestock (MAIL)	Director of Information and Public Relations
4	Hashmat Nasery	Ministry of Urban Development and Land (MUDL)	Director of Information and Public Relations
5	M. Naim Salehi	Civil Aviation Authority (CAA)	Public Information Officer
6	M. Ashraf Haqshinas	Ministry of Public Works (MOPW)	Public Information Officer
7	Tawhid Shokuhmand	Ministry of Public Health (MOPH)	Monitoring Officer
8	Nizam Khpolwak	National Water Regulatory Affairs Authority (NWRA)	Spokesperson
9	Nooragha Haqyar	Ministry of Hajj and Religious Affairs (MOHRA)	Access to Information Specialist
10	Ghulam Hussian Elham	Ministry of Communication and IT (MOCIT)	Media Officer
11	M. Hamid Rahmani	Kabul Municipality	Public Information Officer
12	Safiullah Sirat	Capital Region Independent Development Authority (CRIDA)	Public Information Officer
13	Abdulzahir Sangar	Ministry of Education (MOE)	Public Information Officer
14	Ms. Samira Jamal	National Environmental Protection Agency (NEPA)	Access to Information Specialist
15	Ali Akbar Mohebi	Urban Water Supply and Sewerage Corporation (AUWSSC)	Public Information Officer
16	Noorwali Saed Shinwari	Afghanistan Telecom Regulatory Authority (ATRA)	Director of Information and Public Relations
17	M. Ewaz Farhang	Afghanistan Railways Authority (ARA)	Public Information Officer

No.	Interviewee	Entity	Position
18	Hujatullah Mujadadi	Operation and Support Office of the President	Information and Public Relations Officer
19	M. Yunos Habibi	Energy Services Regulation Authority (ESRA)	Information and Public Relations Officer
20	Habib Bakhtyal	Da Afghanistan Breshna Sherkat (DABS)	Public Information Officer
21	Abdullah Hanif	Herat Municipality	Public Information Officer
22	Engineer Jawid	Mazar Municipality	Public Information Officer
23	Engineer Hiwad	Kandahar Municipality	Public Information Officer
24	Ezatullah Pamir	Nangarhar Municipality	Public Information Officer

Table 2. Data collection period.

No.	Activity	Timeline
1	Coordination with government for ITI implementation and desk research	Feb to April 2021
2	Request infrastructure project list	March to April 2021
3	Finalise list of projects	April 2021
4	Interview process	March to May 2021

2.3 Procuring entities sample

The ITI manual directs the assessment to entities that are engaged in the infrastructure sector. Infrastructure covers a wide range of activities: construction of buildings, roads, bridges, energy generation, and irrigation projects. The research prioritises entities that commission or deliver infrastructure projects.

The research team prepared a general list of 218 active procuring entities in Afghanistan (175 municipalities and 62 central procurement institutions). From this list, 24 infrastructure-related entities were shortlisted for assessment: 10 autonomous bodies, 9 ministries, and 5 municipalities (Kabul, Herat, Kandahar, Jalalabad, and Mazar-e-Sharif). These entities cover a wide range of sectors. As this is the first ITI assessment in Afghanistan, and given time constraints, the assessment was conducted at the national level. To reflect sub-national realities, four provincial municipalities were included, covering zones outside Kabul. The central institutions selected are based in Kabul but operate nationally.

2.4 Infrastructure project sample

Two projects were selected from each of the 24 procuring entities for assessment under Dimension 4, producing a total of 48 projects. Two selection methods were used, in line with the ITI manual.

- The first project in each entity was selected by highest budget. Projects with the highest budget have the greatest impact on society, and public access to information about these projects is a priority for transparency and accountability.
- The second project was selected by random sampling. This method maintains neutrality in selection and strengthens confidence in the overall results.

To gather candidate projects, the CoST Afghanistan Secretariat sent an official letter signed by the Minister of Economy (MSG Chairman) to all 24 entities, requesting the list of completed infrastructure projects from fiscal year 2018 onwards. The research team cross-checked each list against records from the Ministry of Economy and the National Procurement Authority to verify consistency and completeness. Two projects were then selected from each entity, one by budget and one at random.

2.5 Interaction protocol

The assessment followed a structured five-stage interaction protocol to secure political support, coordinate with procuring entities, deliver ITI training, conduct interviews, and run a second round of reactive disclosure.



Figure 3. Five-stage interaction protocol. From political support (Feb) to reactive disclosure follow-up (May).

2.6 Challenges and limitations

Three major challenges shaped data collection:

LIMITED PE COOPERATION ON PROJECT LISTS

Several procuring entities were slow to share their list of completed infrastructure projects. The research team addressed this by sending official emails accompanied by the Minister of Economy letter, and by telephone follow-up.

COVID-19

Pandemic conditions limited in-person interviewing. The team followed the host organisation's COVID-19 safety guidelines throughout fieldwork.

PROVINCIAL MUNICIPALITY ACCESS

Travel to provincial capitals was not feasible within the assessment window. Interviews with the four non-Kabul municipalities (Herat, Mazar, Kandahar, Nangarhar) were conducted online via Zoom.

Chapter 3 | Main results

METHODOLOGY AT A GLANCE

Sample: 24 procuring entities, 48 projects. Indicators: 79 across four dimensions. Scoring: 0–100 per indicator; dimension scores are weighted averages.

Afghanistan scores 43.2. The legal framework is strong. The disclosure infrastructure is not. The gap is the story.

3.1 National ITI score

Reference: the ITI has been applied in 15+ CoST countries. Published national scores range from ~30 (early-stage programmes) to ~85 (mature programmes with strong disclosure systems).

Twenty-four infrastructure-related procuring entities were assessed across the four ITI dimensions: enabling environment, capacities and processes, citizen participation, and information disclosure. The total score is on a scale of 0 to 100; the sum of the weighted dimension scores produces the national ITI score, and the same formula applied per entity produces the procuring entity ITI score.

Afghanistan’s national ITI score is 43.2 out of 100. The scores across dimensions are uneven: the enabling environment (D1) is strong at 79.5, while information disclosure (D4) trails at 16.4.

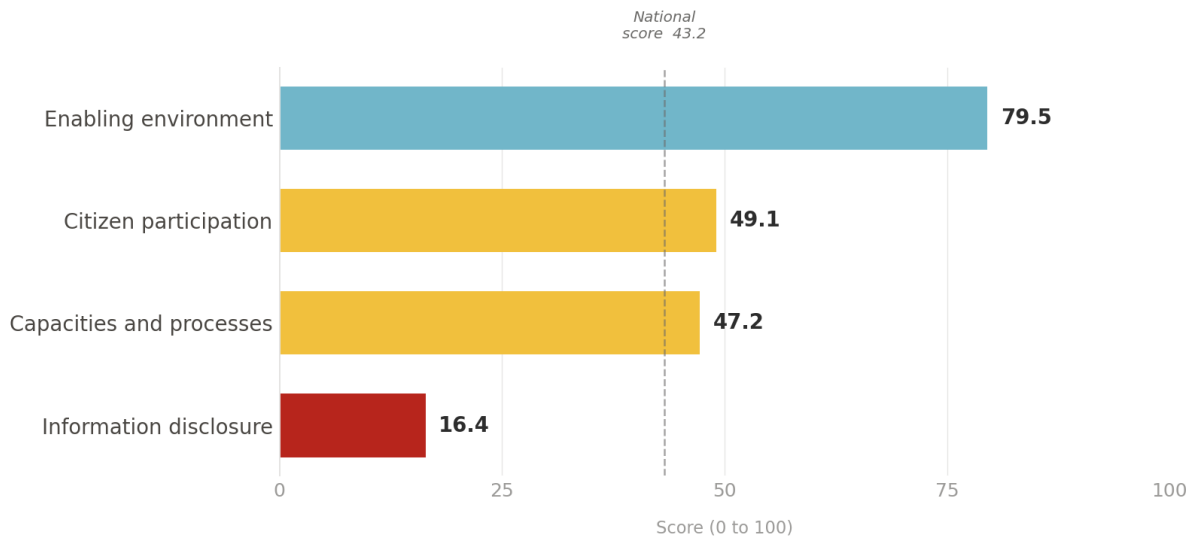


Figure 4. National dimension scores. The gap between the legal framework (D1, 79.5) and actual disclosure (D4, 16.4) is the central story.

Citizen participation (D3) scored 49.1, the highest among the three procuring-entity dimensions. Oversight of infrastructure projects is becoming part of government practice, yet there is no legalised structure or internal policy for citizen engagement. Disclosure (D4) scored 16.4 despite meaningful effort: the AGEOPS system has been developed and used, but the disclosure it

publishes is contract-level only. Project-level data is not published through AGEOPS for any of the 24 assessed entities.

3.1.1 Enabling environment

Afghanistan’s enabling environment scored 79.5 out of 100. The legal framework for access to information is the strongest component. Beyond the Access to Information Law itself, five other instruments establish the basis for disclosure: the Constitution, the Public Procurement Law, the Public Financial Management and Expenditure Law, the Supreme Audit Law, and the Internal Audit Units Regulations. The Procurement Law, the Access to Information Law, and the Public Financial Management and Expenditure Law together contain the core provisions for project and contract information disclosure.

The CoST Afghanistan Disclosure Manual, developed in line with the CoST IDS and the legal instruments above, requires all procuring entities to disclose 63 data points at project and contract level. The Access to Information Law explicitly guarantees public access to information and the use of digital tools for disclosure.

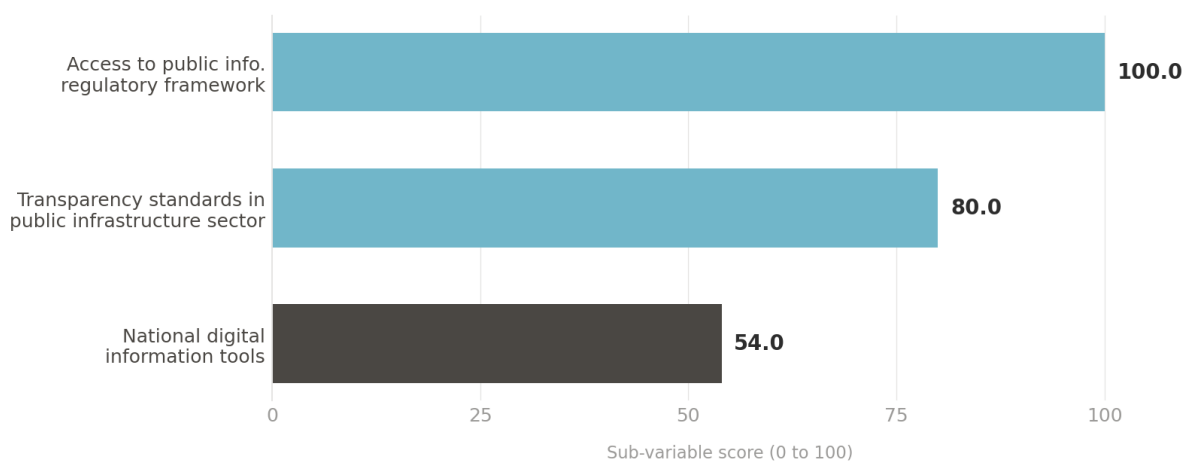


Figure 5. D1 sub-variable breakdown. The regulatory framework is complete; the national digital tools lag.

Among the three sub-variables, access to public information regulatory framework scored 100, transparency standards in the public infrastructure sector scored 80, and national digital information tools scored 54. The lowest component is the infrastructure projects GIS platform (40), indicating that citizens cannot easily locate and inspect projects spatially.

HIGHEST-SCORING INDICATORS (D1)

- 1.1.1.1 Access to public information law. A national law guarantees access to public information in all public-sector institutions, applying to all material held by or on behalf of public authorities. Score: 100.
- 1.1.1.2 Right to request public information. The national legal framework grants citizens the right to request and obtain non-published public information, with access to information and records, no requirement to state reasons, clear maximum timelines, and access to all public institutions. Score: 100.
- 1.1.1.3 Sanctions over non-compliance with access to public information mandates. Sanctions for non-compliance on proactive and reactive disclosure exist within the national legal framework. Score: 100.

The Access to Information Law, enacted in 2014, was designed to open public information. According to the Halifax-based Centre for Law and Democracy and Access Info Europe, which publish an annual ranking to mark International Right to Know Day, Afghanistan’s access to information law was ranked first internationally on legal framework strength. The law empowers citizens to request information and obliges entities to respond under structured timelines; sanctions for non-compliance reinforce the legal obligation.

LOWEST-SCORING INDICATORS (D1)

- 1.1.3.1 Centralised digital information platforms. Centralised national platforms with information on public infrastructure projects. Score: 60.
- 1.1.3.2 Easy access to information in digital information platforms. Information offering details of public infrastructure projects is easily accessible, complete, and ordered. Score: 60.
- 1.1.3.3 Infrastructure projects GIS platform. A web platform with a GIS database of infrastructure projects showing works under execution or recently executed. Score: 40.

While AGEOPS exists, there is no dedicated centralised digital platform for infrastructure project information. AGEOPS data is not easily accessible and the platform is not user-friendly for public audiences.

3.1.2 Capacities and processes

Procedures and institutional capacity drive whether legal rights translate into actual publication. Dimension 2 scored 47.2 out of 100. The assessment covered institutional capacities (basic knowledge and digital capacities), institutional processes (procedures to disclose, enablers and barriers, and control over disclosure) across the 24 procuring entities.

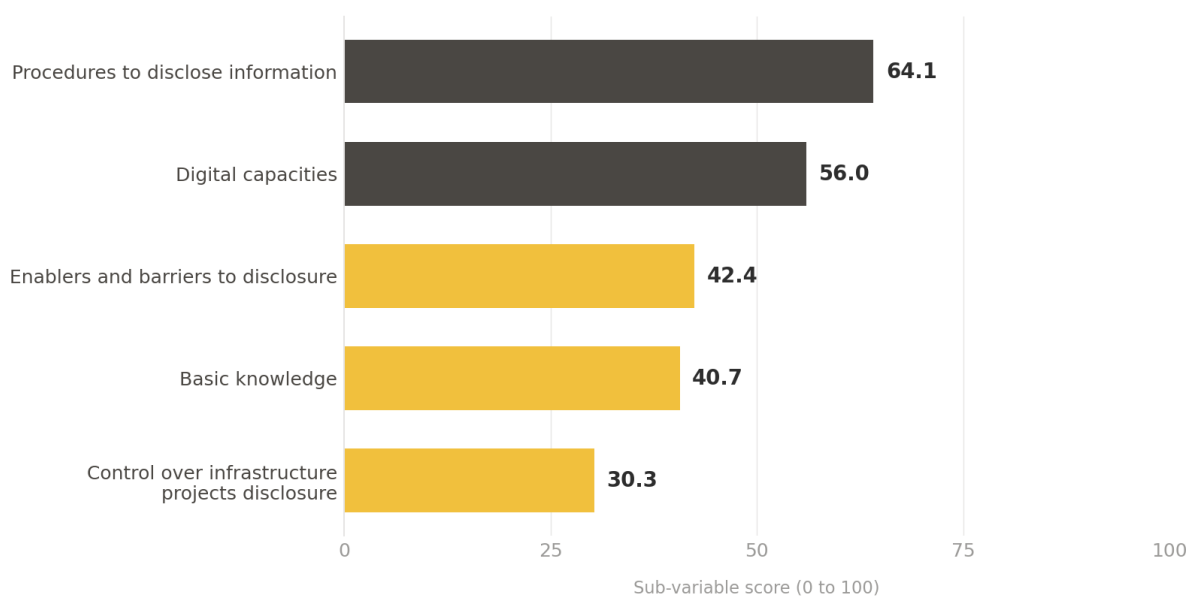


Figure 6. D2 sub-variable breakdown. Procedures for disclosure (64.1) outpace control over actual disclosure (30.3).

The Ministry of Public Works scored 89.6, the highest in Dimension 2. Provincial municipalities (Herat, Kandahar, Mazar, Nangarhar) and the Ministry of Rural Rehabilitation and Development scored among the lowest, reflecting weak institutional capacity for access to information, disclosure, citizen participation, and process control.

Table 3. Top 8 procuring entities on Dimension 2 (Capacities and processes).

Procuring entity	D2 score	Capacities	Processes
Ministry of Public Works	89.6	96.0	85.3
Ministry of Agriculture, Irrigation and Livestock	84.3	86.0	83.1
National Water Regulatory Authority	78.4	73.0	82.0
Capital Region Development Authority	74.9	76.0	74.1
Ministry of Urban Development and Land	73.5	58.0	83.8
Afghanistan Telecom Regulatory Authority	71.6	63.0	77.3
Ministry of Higher Education	70.6	78.0	65.7
Urban Water Supply and Sewerage Corporation	70.2	83.0	61.6

3.1.3 Citizen participation

Citizen participation scored 49.1 out of 100, the highest score among the three procuring-entity dimensions. The assessment evaluated participation practices and the use of information by citizens.

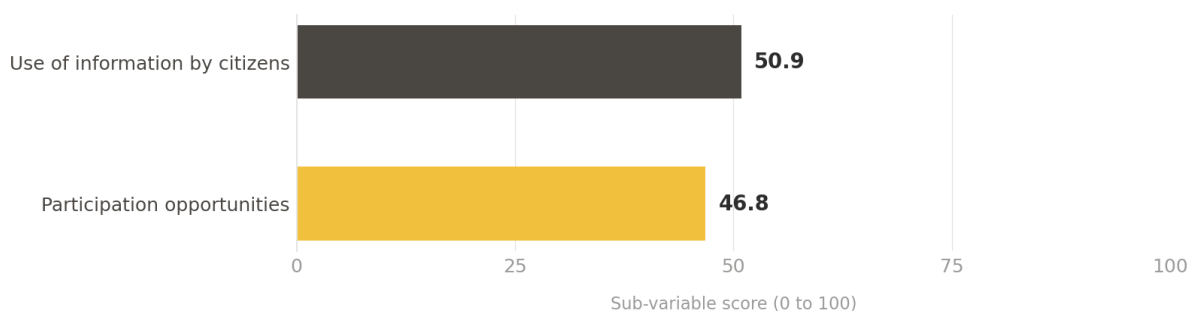


Figure 7. D3 sub-variable breakdown. Use of information (50.9) marginally ahead of participation opportunities (46.8).

The Ministry of Agriculture, Irrigation and Livestock scored 92.2, the highest in Dimension 3. It has developed policies for public participation, facilitated participation opportunities, and enabled citizens’ use of information. At the other end, the National Environmental Protection Agency scored 24.9, with no formal policy for citizen participation or public engagement.

HIGHEST-SCORING INDICATORS (D3)

- 3.1.1.5 Online form for consultation or requests. An online form through which any person may request information, perform a consultation, or submit a complaint on an infrastructure project, and receive an effective response. Score: 67.3.
- 3.1.1.4 Citizen attention office. An office for citizen service (Transparency Office, Complaints Office, Information Office) covering infrastructure projects. Score: 62.0.

- 3.3.2.2 Requests and responses of access to information. Access-to-information requests and responses are recorded. Score: 59.3.

LOWEST-SCORING INDICATORS (D3)

- 3.1.1.3 Citizen participation in infrastructure projects. The entity conducts formal citizen consultation to identify, define, prioritise, and monitor infrastructure projects. Score: 34.0.
- 3.3.2.4 Institutional use evidence. The institution provides the public with feedback, through reports or announcements, on how citizens’ inputs have been used in infrastructure projects. Score: 40.0.
- 3.1.1.1 Institutionalised citizen participation. The institution has formal citizen participation opportunities that allow the procuring entity to listen to and act on requests from citizens. Score: 42.0.

3.1.4 Information disclosure

0

entities publish project-level data (Indicators 4.1.1).

Information disclosure scored 16.4 out of 100, the lowest of the four dimensions. The assessment examined disclosure of infrastructure project information through AGEOPS. Scores reflect what is actually published, not what policy requires.

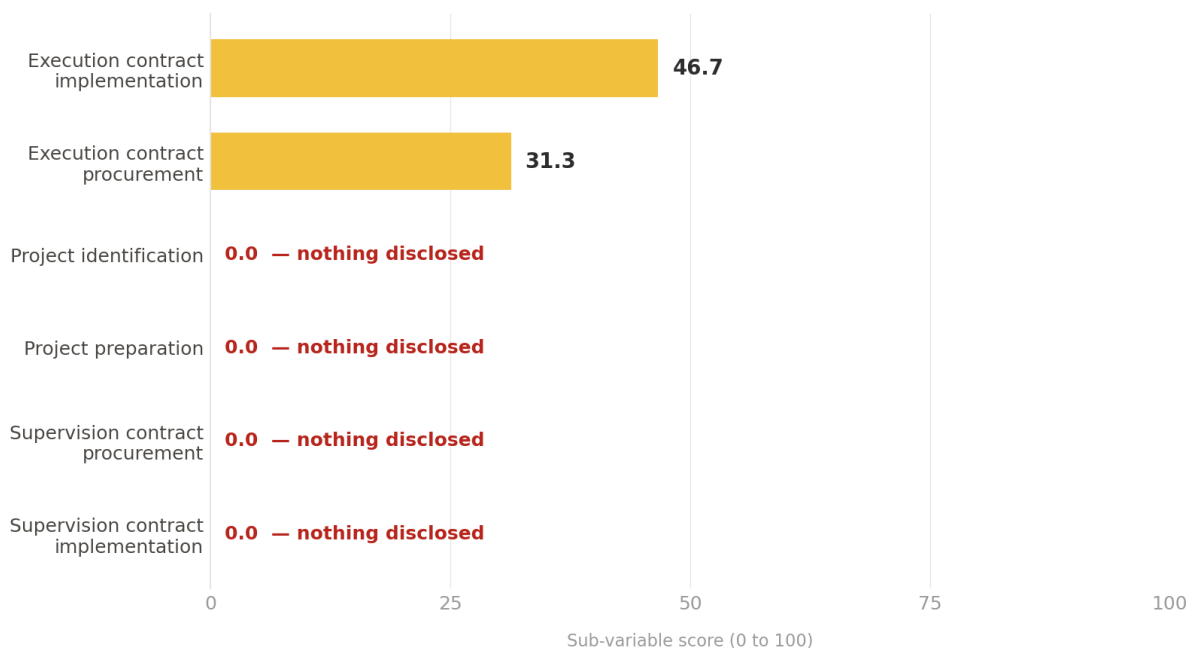


Figure 8. D4 sub-variable breakdown. Four of six disclosure categories score zero across all 24 entities.

Procuring entities have disclosed contract-level data for execution procurement (31.3) and execution implementation (46.7). The four remaining sub-variables, project identification, project preparation, supervision contract procurement, and supervision contract implementation, score zero across every entity. DABS, the Operation and Support Office of the President, Afghanistan Railways Authority, the Capital Region Development Authority, the Ministry of Communication and IT, NEPA, the Civil Aviation Authority, and the Ministry of Higher Education all tie at 36.6 in D4. Seven entities, including all four provincial municipalities outside Kabul, the Energy Services Regulation Authority, the National Water Regulatory Authority, and the Ministry of Rural Rehabilitation and Development, score zero.

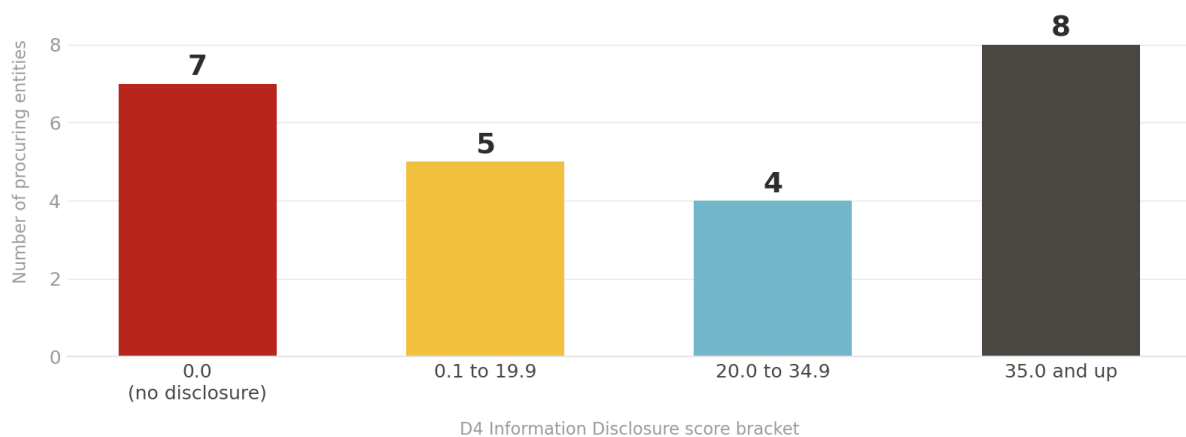


Figure 9. Distribution of procuring entities by D4 disclosure bracket. Seven entities publish nothing at all.

HIGHEST-SCORING INDICATORS (D4)

- 4.1.3.2 Procurement process. The type of procurement process applied to award the contract is clearly identified. Score: 48.3.
- 4.1.3.4 Contract type. The type of contract to be signed is clearly identified. Score: 48.3.
- 4.1.3.5 Contract title. The official name of the signed contract is clearly identified. Score: 48.3.

LOWEST-SCORING INDICATORS (D4)

- 4.1.2.1 Environmental impact. A document identifying and describing the environmental impacts of the project on its surroundings. Score: 0.
- 4.1.2.2 Land and settlement impact. A document identifying the impacts on human settlements and population centres. Score: 0.
- 4.1.2.3 Contact details. Information identifying the responsible officer for the project in the procuring entity. Score: 0.

IMPLICATION

Publishing the contract and nothing of the project around it leaves citizens unable to connect cause to effect. When a contract is published without the project’s identification,

preparation documents, budget approvals, environmental impact, or land settlement documentation, structured oversight is impossible. Harmony between project and contract data would let citizens track actual start and end dates, the responsible officer, and the scope of work. Without it, the public cannot know when, by whom, or how projects will be delivered.

3.2 Procuring entities ITI score

Afghanistan’s procuring entities vary widely in performance, with provincial municipalities clustered at the bottom

Ranked by total ITI score, with color showing disclosure performance (D4)

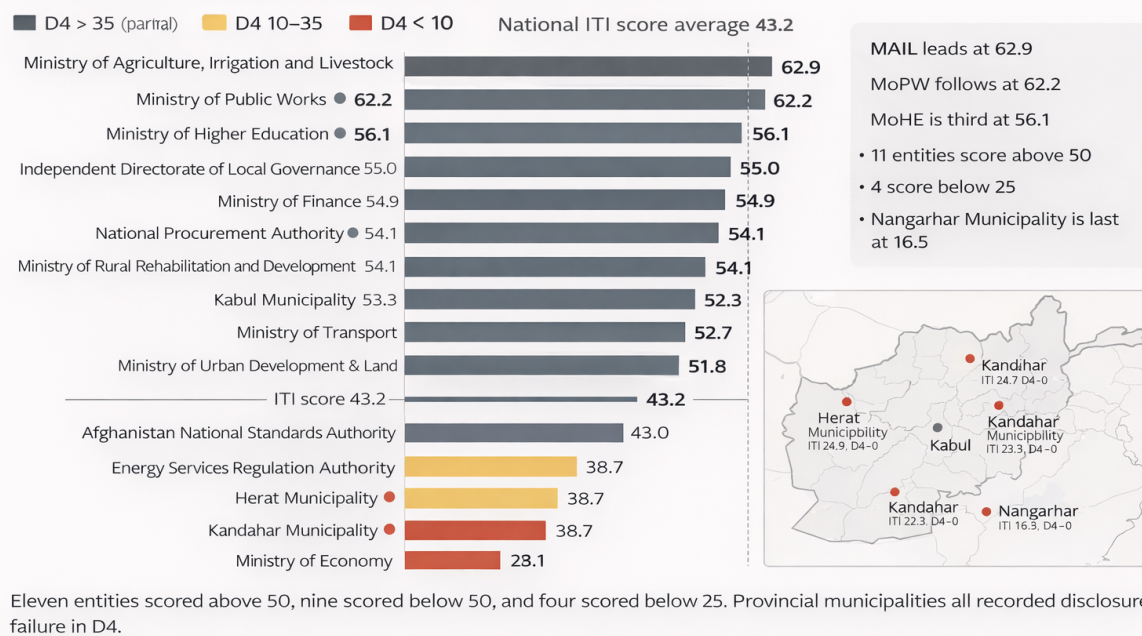


Figure 11. Afghanistan — assessed entities by disclosure band

The Ministry of Agriculture, Irrigation and Livestock (MAIL) is ranked first at 62.9 out of 100. The Ministry of Public Works is second at 62.2. The Ministry of Higher Education is third at 56.1. On the other side, Nangarhar Municipality is last at 16.5. The provincial municipalities, the Ministry of Hajj and Religious Affairs, and the Energy Services Regulation Authority cluster at the bottom of the ranking.

The factors driving MAIL’s first position are significant in implementing the access to information law, a professional website, consistent publication of infrastructure-related information, use of digital systems, and developed policies for access to information and citizen participation. At the bottom of the ranking, the provincial municipalities of Herat, Mazar, Kandahar, and Nangarhar, together with ESRA and MoHRA, lack citizen participation mechanisms, have low institutional

capacity, run limited digital systems, have no supporting policies, and publish little or no infrastructure project information.

Eleven entities scored above 50. Nine entities scored below 50. Four scored below 25. The gap reflects unequal distribution of institutional capacity and the absence of a binding, standardised disclosure obligation at the project level.

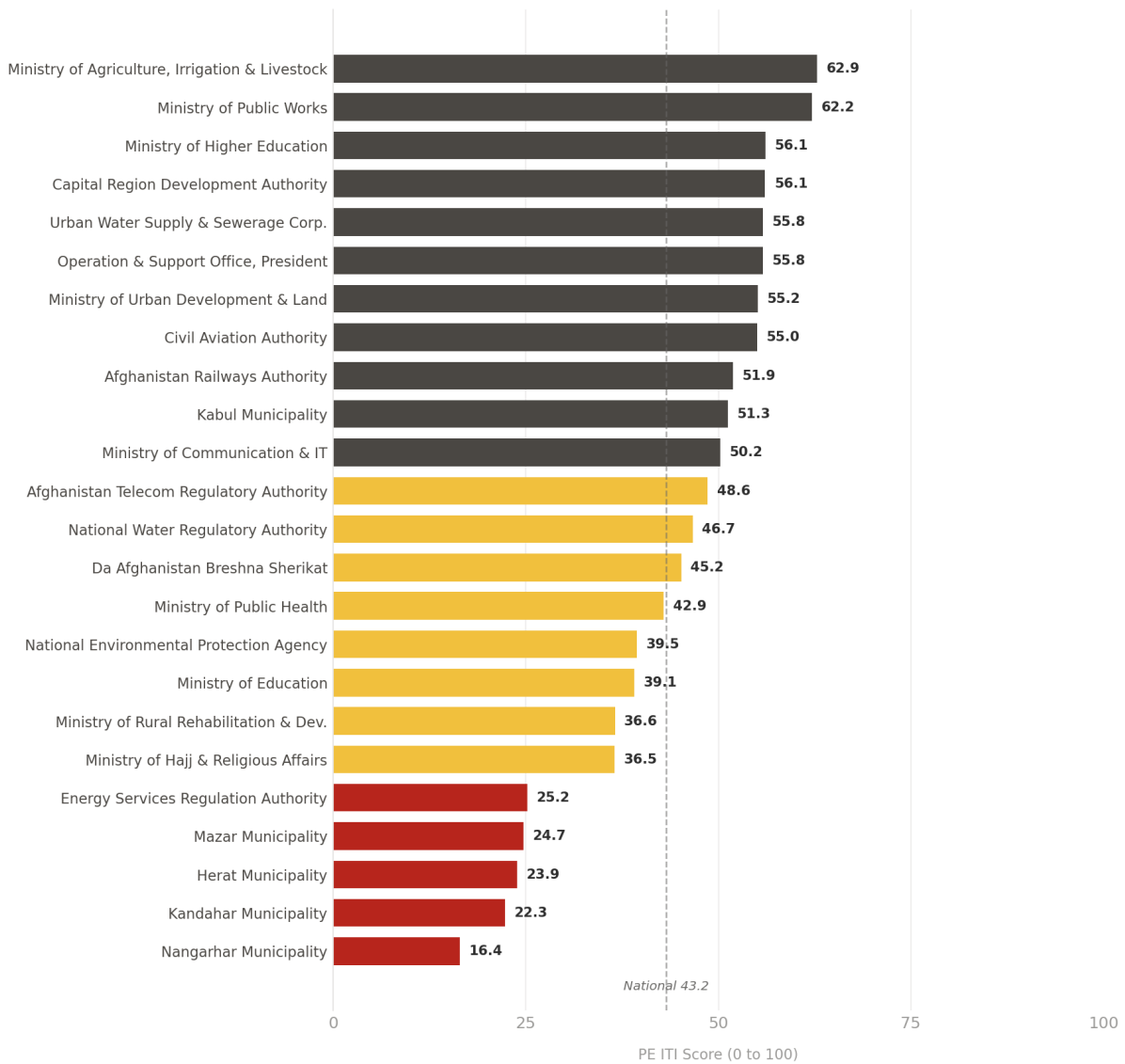


Figure 10. All 24 procuring entities ranked by ITI score. Dashed line is the national score (43.2).

3.2.1 Results by procuring entity budget

Three development-budget categories emerge among the 24 entities. Entities with development budgets between 5 and 15 billion AFG scored highest on average at 52.1. Entities above 15 billion AFG scored 49.3 on average. Entities below 5 billion AFG scored 35.3 on average, dragged down by autonomous bodies, ministries with few infrastructure projects, and municipalities.

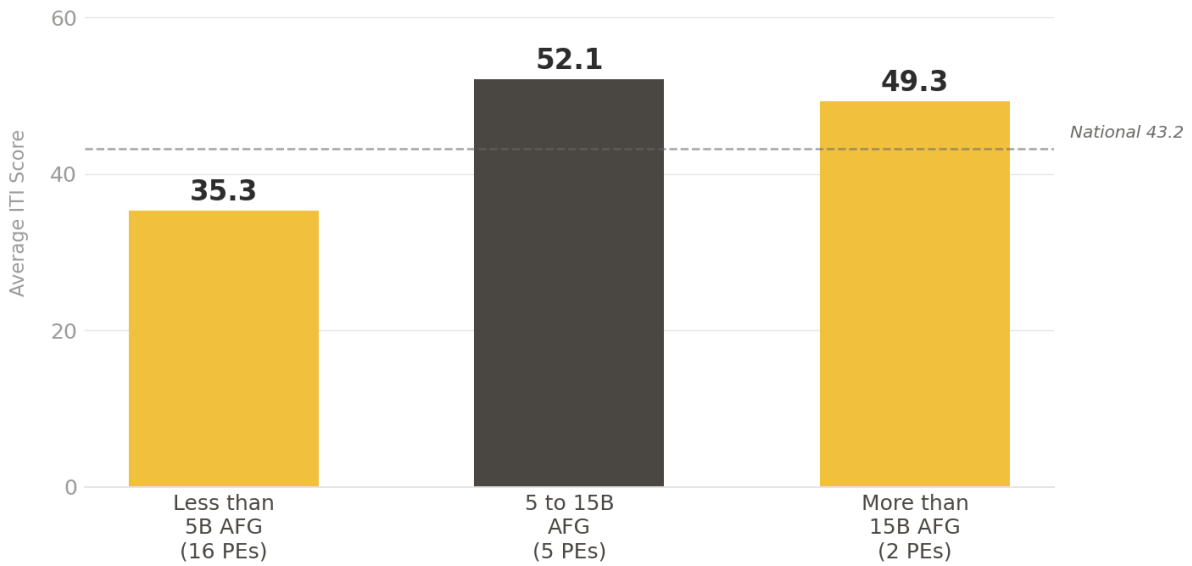


Figure 11. Average ITI score by development budget bracket. Mid-tier entities outperform the largest and smallest alike.

3.2.2 Results by procuring entity type

By type, ministries lead with an average ITI score of 49.1. Autonomous entities score 48.0 on average. Municipalities score 27.7 on average, with four of the five scoring below the national mean. Kabul Municipality is the exception at 51.3.

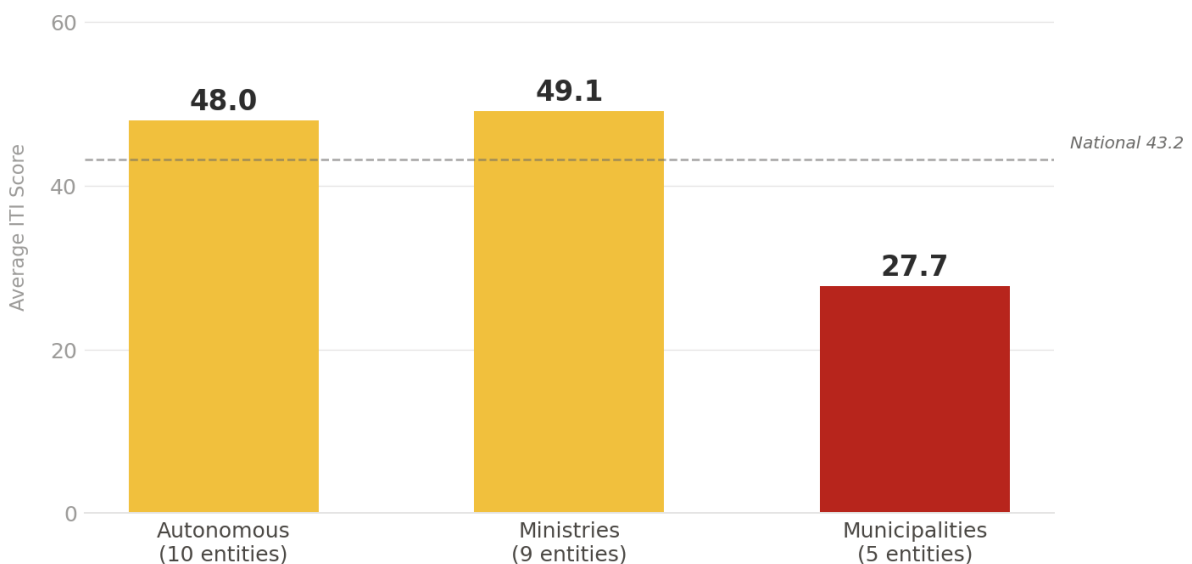


Figure 12. Average ITI score by procuring entity type. Municipalities trail ministries and autonomous bodies.

3.2.3 Results by procuring entity sector

Procuring entity performance — D2, D3, D4

Ministry of Agriculture, Irrigation and Livestock (MAIL)	84	92	26
Ministry of Public Works (MoPW)	90	82	26
Ministry of Higher Education (MoHE)	71	67	37
Capital Region Development Authority (CRIDA)	75	61	37
Afghanistan Urban Water Supply and Swerage Corporation	70	73	33
The Operation and Support Office of the President for N	64	74	37
Ministry of Urban Development and Land (MUDL)	74	88	18
Civil Aviation Authority of Afghanistan (CAA)	69	65	37
Afghanistan Railways Authority (ARA)	65	58	37
Kabul Municipality	50	82	33
Ministry of Communication and Information Technology (60	58	37
Afghanistan Telecom Regulatory Authority (ATRA)	72	65	18
National Water Regulatory Affairs Authority	78	77	—
Da Afghanistan Breshna Sherikat	49	53	37
Ministry of Public Health (MoPH)	58	60	18
National Environmental Protection Agency (NEPA)	53	25	37
Ministry of Education (MoE)	61	57	8
Ministry of Rural Rehabilitation and Development (MRRD)	45	83	—
Ministry of Hajj and Religious Affairs (MoHRA)	49	49	18
Energy Services Regulation Authority (ESRA)	48	33	—
Mazar Municipality	37	47	—
Herat Municipality	35	46	—
Kandahar Municipality	30	48	—
Nangarhar Municipality	27	28	—

D2 Capacities & Processes D3 Citizen Participation D4 Information Disclosure

Figure 13. Procuring-entity heatmap (D2–D4)

Dimension averages by sector

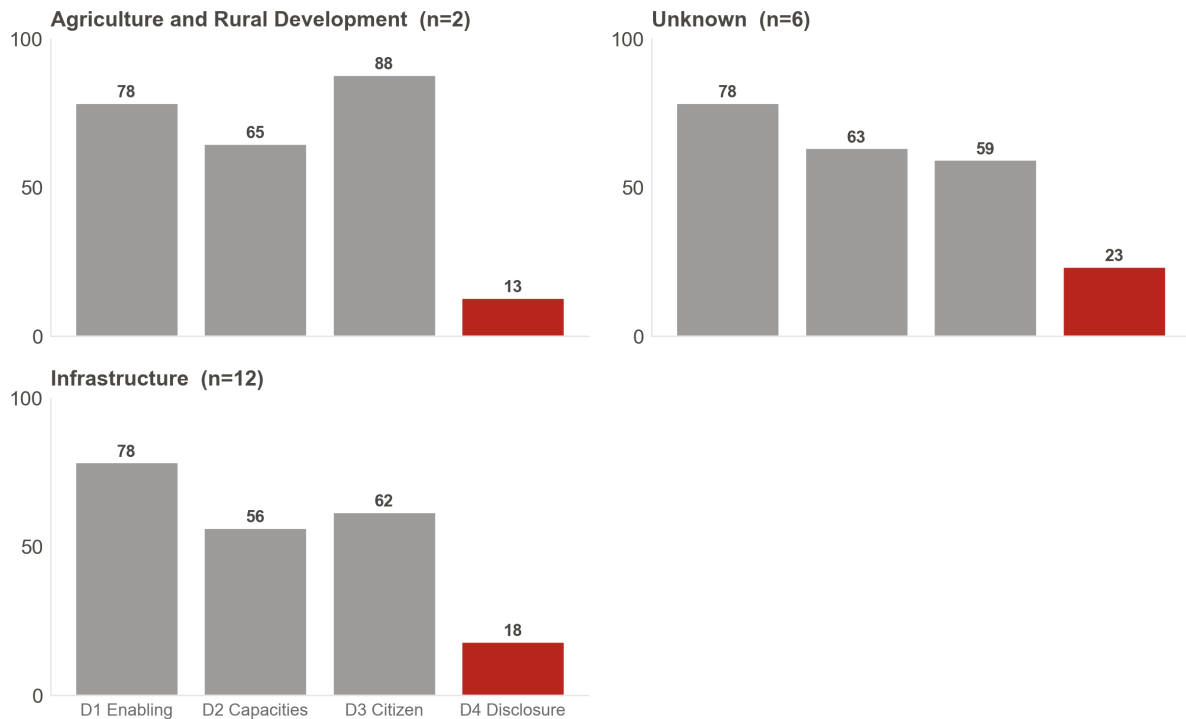


Figure 12. ITI dimensions by sector

By sector, agriculture and rural development averages 49.7 (driven by MAIL at 62.9). Education averages 47.6. Health is at 42.9. Infrastructure itself averages 38.8, pulled down by the four provincial municipalities. Culture and religion (MoHRA) stands at 36.5. Social immunity (NEPA) is lowest at 19.7.

3.3 Infrastructure project scores

Forty-eight projects were evaluated under Dimension 4 (two per procuring entity). Project-level disclosure scores mirror the entity scores: projects from MAIL, MoPW, and MoHE show the highest disclosure; projects from the four non-Kabul provincial municipalities and from ESRA, NWRA, and MRRD show zero disclosure, consistent with those entities’ overall D4 performance. Across the full project set, contract-level data is the only category with consistent publication; project identification, project preparation, and supervision contract data are uniformly missing.

Chapter 4 | Findings and recommendations

Five findings, five recommendations. Ordered by what breaks the disclosure system the most.

The four dimensions yield four distinct findings and a set of recommendations with named responsible parties. All recommendations are set for a one-year progress horizon; progress should be reassessed in the next ITI cycle.

FINDING 1 | ENABLING ENVIRONMENT

The enabling environment scored 79.5 out of 100. Significant progress is evident: the Access to Information Law gives citizens a legal right to infrastructure project information, and the procurement and public finance laws reinforce disclosure obligations. Awareness of the law is uneven, however. Several entities, particularly provincial municipalities, are not fully informed about the legal articles on public access, disclosure, and use of information.

RECOMMENDATION | ACCESS TO INFORMATION COMMISSION

Expand public awareness programmes at national and provincial level. A viable first stage is five public awareness programmes across the five Afghanistan zones, targeting both citizens and the PIOs of provincial entities.

The AGEOPS system has been established for disclosure of publicly funded project information. Unavailability of a centralised digital platform specifically for infrastructure projects remains a key gap. The user experience is weak and project data is not easy to find.

RECOMMENDATION | NATIONAL PROCUREMENT AUTHORITY

Establish a centralised disclosure system for infrastructure project information based on CoST IDS and, in particular, the OC4IDS data standard. The platform should be purpose-built for infrastructure, distinct from AGEOPS's general procurement function.

FINDING 2 | CAPACITIES AND PROCESSES

Dimension 2 scored 47.2. Institutional capacity and procedures vary widely across the 24 entities. The Ministry of Agriculture, Irrigation and Livestock has developed internal policies for every major process, including a specific policy developed in line with the Access to Information Law for responding to citizens' requests. The Ministry of Public Works scores 89.6 on this dimension. At the other end, the Energy Services Regulation Authority and the Ministry of Hajj and Religious Affairs have no corresponding internal policies or strategies.

PIO responsibilities are not defined consistently. In several entities, particularly provincial municipalities, the PIO is a non-specialised staff member without training in handling information requests. Resourcing is also uneven: at ATRA the PIO has a 25 Mbps internet connection, while at MUDL the PIO has less than 1 Mbps. This creates a direct barrier to responding to online access to information requests.

RECOMMENDATION | ALL 24 PROCURING ENTITIES, WITH OCAI SUPPORT

Strengthen internal capacity and process for disclosure of information, public participation, and social awareness. Concretely: review existing policies and strategies for disclosure, access to information response, and citizen participation; develop an internal policy on disclosure of infrastructure project information, aligned with the Access to Information Law, Procurement Law, and procurement regulations. The Office of the Commissioner for Access to Information (OCAI) should also review PIO status, responsibilities, training, and equipment across entities.

FINDING 3 | CITIZEN PARTICIPATION

Dimension 3 scored 49.1. Most entities recognise the importance of citizen participation, but participation is not institutionalised. There is no legalised structure or policy for public engagement in infrastructure planning, execution, or monitoring.

RECOMMENDATION | CoST AFGHANISTAN MSG, WITH MoEC AND NPA

Develop a policy on public participation and engagement for the infrastructure sector, with clear procedures for consultation, feedback to citizens, and the use of citizen inputs in project prioritisation and monitoring.

FINDING 4 | INFORMATION DISCLOSURE

Dimension 4 scored 16.4 out of 100. CoST recognises five stages in infrastructure project delivery where substantial data is generated and must be disclosed: project identification, project preparation, contracting and procurement, contract implementation, and contract completion. Project-level data (identification and preparation) and contract-level data (the three contracting stages) must be published together for the disclosure to be meaningful. AGEOPS publishes contract-level data only. Project-level data is not disclosed by any of the 24 assessed entities.

RECOMMENDATION | NPA AND PROCURING ENTITIES

Establish a centralised disclosure system for infrastructure project information based on the OC4IDS standard.

Introduce a Project Identifier Code and formally define what constitutes project-level data and contract-level data.

For each of the 24 procuring entities, create a dedicated disclosure view aligned to OC4IDS. NPA should coordinate the standardisation and the technical onboarding.

Annex A | National ITI score, all indicators

The full indicator scores that roll up into Afghanistan’s national ITI score of 43.2 out of 100. Dimensions are listed in order (D1 to D4). Each row shows the component level, the name, and the score on the 0 to 100 scale.

Code	Level	Name	Score
1	Dimension	Enabling environment	79.5
1.1	Variable	Legal framework and digital tools	79.5
1.1.1	Sub-variable	Access to public information regulatory framework	100.0
1.1.1.1	Indicator	Access to public information law	100.0
1.1.1.2	Indicator	Right to request public information	100.0
1.1.1.3	Indicator	Sanctions over non-compliance with access to public information mandates	100.0
1.1.1.4	Indicator	Organisation guaranteeing the sanctions	100.0
1.1.2	Sub-variable	Transparency standards in the public infrastructure sector	80.0
1.1.2.1	Indicator	Proactive publication of information on public procurement processes	100.0
1.1.2.2	Indicator	Proactive publication of information on public infrastructure projects	100.0
1.1.2.3	Indicator	Infrastructure data disclosure standard	–
1.1.2.4	Indicator	Infrastructure data disclosure standard proactively published as open data	100.0
1.1.2.5	Indicator	Organisation responsible for the infrastructure data disclosure standard	100.0
1.1.3	Sub-variable	National digital information tools	54.0
1.1.3.1	Indicator	Centralised digital information platforms	60.0
1.1.3.2	Indicator	Easy access to information in digital information platforms	60.0
1.1.3.3	Indicator	Infrastructure projects GIS platform	40.0
2	Dimension	Capacities and processes	47.2
2.1	Variable	Institutional capacities	48.3
2.1.1	Sub-variable	Basic knowledge	40.7
2.1.1.1	Indicator	Knowledge about the access to information law	54.0
2.1.1.2	Indicator	Knowledge about transparency initiatives in the infrastructure sector	30.0
2.1.1.3	Indicator	Knowledge about the transparency data standard in the infrastructure sector	10.7

Code	Level	Name	Score
2.1.1.4	Indicator	Knowledge about sanctions due to non-compliance	55.3
2.1.1.5	Indicator	Knowledge about different data categories	53.3
2.1.2	Sub-variable	Digital capacities	56.0
2.1.2.1	Indicator	Computer equipment	66.0
2.1.2.2	Indicator	Connectivity to the internet	58.7
2.1.2.3	Indicator	Institutional website	69.3
2.1.2.4	Indicator	Information systems for infrastructure projects	40.0
2.1.2.5	Indicator	Use of digital information systems	34.7
2.1.2.6	Indicator	Infrastructure open data publication	45.3
2.1.2.7	Indicator	Visualisations based on infrastructure projects data	52.0
2.2	Variable	Institutional processes	46.4
2.2.1	Sub-variable	Procedures to disclose information	64.1
2.2.1.1	Indicator	Procedures for the publication of information	48.0
2.2.1.2	Indicator	Responsibilities for disclosure	68.0
2.2.1.3	Indicator	Information officer profile	74.7
2.2.1.4	Indicator	Information officer	74.0
2.2.1.5	Indicator	Follow-up mechanisms on information requests	56.0
2.2.2	Sub-variable	Enablers and barriers to disclose information	42.4
2.2.2.1	Indicator	Internal policy for information publication	32.7
2.2.2.2	Indicator	Disclosure training programme	38.7
2.2.2.3	Indicator	Identification of limitations for publishing information	56.7
2.2.2.4	Indicator	Plan to mitigate limitations for publishing information	13.3
2.2.2.5	Indicator	Bureaucratic barriers to publish information	46.7
2.2.2.6	Indicator	Documentation of non-compliance and sanctions	60.0
2.2.3	Sub-variable	Control over infrastructure projects disclosure	30.3
2.2.3.1	Indicator	Level of disclosed infrastructure projects	36.7
2.2.3.2	Indicator	Level of investment represented by disclosed infrastructure projects	24.0
3	Dimension	Citizen participation	49.1
3.1	Variable	Participation practices	49.1
3.1.1	Sub-variable	Participation opportunities	46.8
3.1.1.1	Indicator	Institutionalised citizen participation	42.0
3.1.1.2	Indicator	Permanent and inclusive citizen participation	42.7

Code	Level	Name	Score
3.1.1.3	Indicator	Citizen participation in infrastructure projects	34.0
3.1.1.4	Indicator	Citizen attention office	62.0
3.1.1.5	Indicator	Online form for consultation or requests	67.3
3.1.1.6	Indicator	Awareness of participation opportunities	48.0
3.1.2	Sub-variable	Use of information by citizens	50.9
3.1.2.1	Indicator	Centralised citizen complaints	56.7
3.3.2.2	Indicator	Requests and responses of access to information	59.3
3.3.2.3	Indicator	Institutional response capacity	53.3
3.3.2.4	Indicator	Institutional use evidence	40.0
3.3.2.5	Indicator	Citizens use evidence	59.3
3.3.2.6	Indicator	Evidence of joint projects	42.7
3.3.2.7	Indicator	Improvements as a response to citizen participation	50.0
4	Dimension	Information disclosure	16.4
4.1	Variable	Disclosure practices	16.4
4.1.1	Sub-variable	Project identification	–
4.1.1.1	Indicator	Project reference number	–
4.1.1.2	Indicator	Project owner	–
4.1.1.3	Indicator	Sector and sub-sector	–
4.1.1.4	Indicator	Project name	–
4.1.1.5	Indicator	Project location	–
4.1.1.6	Indicator	Project description	–
4.1.1.7	Indicator	Purpose	–
4.1.2	Sub-variable	Project preparation	–
4.1.2.1	Indicator	Environmental impact	–
4.1.2.2	Indicator	Land and settlement impact	–
4.1.2.3	Indicator	Contact details	–
4.1.2.4	Indicator	Project budget and date of approval	–
4.1.2.5	Indicator	Funding sources	–
4.1.3	Sub-variable	Execution contract procurement	31.3
4.1.3.1	Indicator	Procuring entity and contact details	29.0
4.1.3.2	Indicator	Procurement process	48.3
4.1.3.3	Indicator	Number of firms bidding	–
4.1.3.4	Indicator	Contract type	48.3

Code	Level	Name	Score
4.1.3.5	Indicator	Contract title	48.3
4.1.3.6	Indicator	Contract price	38.3
4.1.3.7	Indicator	Contract start date	40.0
4.1.3.8	Indicator	Contract duration	40.0
4.1.3.9	Indicator	Contractor(s)	21.0
4.1.3.1	Indicator	Contract scope of work	–
4.1.4	Sub-variable	Supervision contract procurement	–
4.1.5	Sub-variable	Execution contract implementation	46.7
4.1.5.1	Indicator	Variation to contract price	46.7
4.1.5.2	Indicator	Reasons for price changes	46.7
4.1.5.3	Indicator	Variation to contract duration	46.7
4.1.5.4	Indicator	Reasons for contract duration changes	46.7
4.1.5.5	Indicator	Variation to contract scope	46.7
4.1.5.6	Indicator	Reasons for scope changes	46.7
4.1.6	Sub-variable	Supervision contract implementation	–

Annex B | Procuring entity ITI ranking

Twenty-four procuring entities ranked by ITI score, with dimension contributions. D1 is the national enabling environment score (78.3) applied to every entity as the ITI methodology stipulates; entity-specific variation lies in D2, D3, and D4.

Procuring entity	Rank	ITI	D2	D3	D4
Ministry of Agriculture, Irrigation and Livestock	1	62.9	84.3	92.2	25.8
Ministry of Public Works	2	62.2	89.6	82.0	25.8
Ministry of Higher Education	3	56.1	70.6	67.1	36.6
Capital Region Development Authority	4	56.1	74.9	61.0	36.6
Urban Water Supply and Sewerage Corporation	5	55.8	70.2	72.7	32.7
Operation and Support Office of the President	6	55.8	64.3	74.5	36.6
Ministry of Urban Development and Land	7	55.2	73.5	88.5	18.3
Civil Aviation Authority	8	55.0	68.9	65.1	36.6
Afghanistan Railways Authority	9	51.9	65.1	58.0	36.6
Kabul Municipality	10	51.3	50.1	81.5	33.3
Ministry of Communication and IT	11	50.2	60.4	57.8	36.6
Afghanistan Telecom Regulatory Authority	12	48.6	71.6	65.0	18.3
National Water Regulatory Authority	13	46.7	78.4	77.0	–
Da Afghanistan Breshna Sherikat	14	45.2	49.3	53.1	36.6
Ministry of Public Health	15	42.9	58.5	60.5	18.3
National Environmental Protection Agency	16	39.5	53.2	24.9	36.6
Ministry of Education	17	39.1	61.5	56.8	8.4
Ministry of Rural Rehabilitation and Development	18	36.6	45.0	83.3	–
Ministry of Hajj and Religious Affairs	19	36.5	48.6	48.8	18.3
Energy Services Regulation Authority	20	25.2	48.2	33.1	–
Mazar Municipality	21	24.7	37.3	46.8	–
Herat Municipality	22	23.9	35.3	46.1	–

Procuring entity	Rank	ITI	D2	D3	D4
Kandahar Municipality	23	22.3	29.6	47.8	–
Nangarhar Municipality	24	16.4	26.9	28.2	–