

The Nurturing State: An Intimate Portrait of Becoming a Taxpayer in Ghana

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Introduction: Encountering the Tax Collector

West Africa Business Expo, September 2013. 'It's all here! Starting, managing, and building your business!' announced the placard welcoming participants to Accra International Conference Centre, a plush venue that hosts major events in the Ghanaian capital. Vaida had come to the expo to get advice on how to grow her cement business. She had ambitious plans – she had recently established connections with an important cement supplier in Aflao, a border town between Ghana and Togo, where she travelled monthly to transport cement back to Accra. She aspired to become a major cement distributor in the capital; however, she was dissatisfied with the slow pace of her business. She sold cement from a kiosk container in an Accra suburb, which was too small a space to fully mobilise her new supplier networks and 'satisfy customers' in the Ghanaian capital, where cement was in high demand due to a boom in housing construction.

The West Africa Business Expo, where participants would learn the 'tactics of business success', promised to help her. Vaida had seen the event advertised on television and immediately scribbled down the number to register. When she arrived on site, to her surprise, the organisers decided to reduce her fee payment from 70 GHS to 50 GHS.¹ 'And then, they gave me food,' Vaida said, pointing at the packet of chicken and rice leftovers that she was carrying in a plastic bag.

I met Vaida during a session on 'business growth', where we sat next to each other taking notes. Vaida was recording business advice, and I was taking field notes for my PhD dissertation. She stood out from the predominantly youthful crowd dressed in suits or pencil skirts and

¹ As of September 2013, the exchange rate of the British pound to the Ghanaian cedi was approximately 3.5.

carrying briefcases. Wearing a T-shirt, a bumbag, and a colourful Ghanaian cloth fabric around her waist, Vaida was among the few informal sector trader-entrepreneurs who had found their way to the event. Most of the other participants were university graduates who sought out such occasions to network, find job opportunities, and look for start-up capital for their business ideas. The session we attended was a peculiar mix of presentations. After speeches on how to establish a digital presence (by a Dutch female consultant employed by Google, one of the sponsors of the event) and 'To go global, what is needed' (by a consultant employed by the Ghana Investment Promotion Centre), we saw a presentation from the Ghana Revenue Authority (GRA), the state agency responsible for collecting taxes. Following a vibrant debate about accessing start-up capital, silence fell in the room as the male representative of GRA took the podium. He launched into a speech about how the agency struggled to convince Ghanaian entrepreneurs to honour their tax obligations:

We at GRA, we aim to get close to our customers. The Ghana tax system is not as hard as you want to believe. I do not want to blame you though, maybe we are not educating you enough But I want to urge you: Believe in us, just like Jesus said, believe in God, and give God what belongs to God and to Caesar what belongs to Caesar. You see, the government sector, we are trying.² There are reforms ongoing all the time. . . . But we are all liars, we are all lying around. Please be truthful. The government needs the money. Be transparent to us, we are also trying Start-ups, they do not even come to us. It's as if they are hiding. But we do not give up.³

Rather unsurprisingly, given the widespread sentiments that the Ghanaian government was 'wasting' taxpayers' money (Kauppinen 2020: 39), several audience members commented that there is 'little incentive' to pay tax because of recurrent government scandals implying that tax money is mishandled – 'People feel hurt when they find out,' one young man asserted. Nowadays, people do find out, at least occasionally. The Ghanaian media frequently run stories of the government's failures to account for public funds that have disappeared, including news stories of lucrative 'projects' granted to politicians' family members. Following

² In the Ghanaian English lexicon, the expression that someone 'is trying' means that someone is doing well.

³ This excerpt from the speech is taken from field notes on West Africa Business Expo, 6 September 2013.

the liberalisation of the Ghanaian media in the mid-1990s, such news items have become commonplace, fuelling public accusations of political corruption and poor economic management (see Daswani 2020). Salaried professionals, middle-class entrepreneurs, and university graduates, in particular, who constituted the majority of participants in the Business Expo, interpreted such stories as evidence of the government ‘wasting the taxpayer’s money’, which signalled their broader lack of trust in the state’s competence of fiscal management. Some referred to such news stories to justify tax evasion (Kauppinen 2020: 42). I had also heard more popular versions of the same predicament, whereby people stated that the government ‘chops the money’, meaning ‘eats the money’, which would echo in marketplaces, public transport, and family compounds whenever such scandals came to public attention. This other version did not specify whether the money came from Ghanaian taxpayers, or, say, extended credit facilities or developmental aid. Besides vibrant public debate, the popular distrust of the government to handle public funds, which has a long history in Ghana (Aboagye & Hillbom 2020), had hampered the implementation of fiscal reforms, such as Value Added Tax (VAT) and personal income tax. People were not convinced of the benefits of paying (Osei 2000).⁴

Vaida was listening to the debate with a contemplative look. After the session ended and we were wandering around the exhibition stands where Ghanaian insurance companies, banks, and private universities were advertising their services, Vaida announced, speaking to me in both Twi and pidgin English, that she would go to register her company the following Monday. Upon arriving at the venue, she had met representatives of the GRA by the entrance door who had told her that registering her cement business, and consequently, becoming a taxpayer and what in bureaucratic language was dubbed ‘an agent for VAT collection’, would ‘make your business grow’. Having an official company name and a tax identification number (TIN) would connect her with ‘big customers’ who, the representatives seemed to imply, would require an official sales invoice. Moreover, the presentation by GRA was scheduled for a session on ‘business growth’, implying that becoming a taxpayer was integral to business success and larger profit margins. I asked Vaida if I could join her on the following Monday at the Central Registrar. ‘That’s fine. You can help me with the forms,’ she said, before she boarded a *troto*

⁴ See Willmott (2019: 144–145) for an intriguing example of international taxpayer associations’ conferences that Ghanaian representatives have also attended.

minibus at the busy traffic junction next to the conference centre to return to her shop in Accra's outskirts.

The Nurturing State: A Preamble

State–citizen fiscal relations in Africa are often described as fraught with tension due to widespread popular perceptions of the state as an untrustworthy entity whose attempts to tax its citizens have been historically resisted (Guyer 1992; Meagher 2018; Orock & Mbuagbo 2012). Besides resistance to extractive colonial taxation that was designed to provide the fiscal basis of the colonial administration, in Ghana (Atuguba 2006: 8) as elsewhere (Gardner 2012; see also Chapter 10), the genealogy of tax resistance in Africa extends further to the precolonial era when locally raised levies were an index of free versus bonded labour (Roitman 2005: 196–197). The existing fiscal anthropology of Africa has shown that attitudes to taxation are as complex as they are historically constituted, which draws attention to the limits of what Meagher (2018: 4–5) calls ‘fiscal essentialism’. Taxation hardly constitutes the *de facto* basis of social contract between the state and citizens (see also Makovsky & Smith 2020), especially in postcolonial contexts characterised by large swathes of informal economy and unequal access to the public sphere to demand accountability. Rather, from an anthropological perspective, taxation must be understood as one possible ‘regime’ of collection, redistribution, and even value quantification, which exists in a productive relationship to other transactional modes and levies contributing to alternative redistributive agents (Makovsky & Smith 2020: 12). As such, even in locations where taxation is a well-established system of redistribution, its regimes can be subject to negotiation, contestation, and manoeuvring on the ground (Boll 2014a). At the same time, tax revolts witnessed in several parts of Africa since the colonial era, and, most recently, in European states such as France where the ‘yellow vests’ protested the increase in fuel tax (Donadio 2018), speak to the affective power of taxes as catalysts for broader debates about fairness, justice, and the state’s successes and failures as an agent of redistribution.

Although surrounded by critical attitudes to taxation, Vaida’s journey through the Ghanaian tax system at the centre of this chapter elicits questions at the other end of the spectrum in broader anthropological tax scholarship, namely, questions of tax compliance (Björklund Larsen 2018; Boll 2014b). Why did Vaida decide to comply and become a

taxpayer, which meant sacrificing part of her profit margin in order to pay tax to the state? Was there something 'desirable' about becoming a taxpayer, and in the case of her business, 'an agent for VAT collection'? And most importantly, what, ultimately, did Vaida expect to materialise through tax payments; what did she expect from the state 'in return'?

This chapter explores the notions of reciprocity that shape concepts of taxation in Ghana's informal sector. Following Vaida through the bureaucratic encounters involved in registering her business and becoming a taxpayer, I demonstrate that Vaida understood her taxes as tokens of reciprocity towards the state, which she exchanged in expectation of securing patronage. Patronage in this chapter stands for what I have elsewhere conceptualised as a 'rightful return' (Kauppinen 2020). This is a distributive demand that citizens voice towards power holders of collective pools of revenue, whether in the form of taxes to the state, tithes to the church and God, or other types of levies and transactional modes. Instead of public goods such as roads, bridges, and hospitals, Vaida understood tax payments as a fiscal flow that materialises a new, closer kind of relationship to the state. Expecting patronage as the rightful return was integral to her conceptualisation of the social productivity of taxes as monetary transfers. Already at the Business Expo, Vaida singled out the packet of chicken and rice as a special, personalised token that the 'organisers', who turned out to be the representatives of GRA, handed to her, in addition to the reduction of her attendance fee. Far from implying that patronage simply reproduces itself through taxation as the neo-patrimonial 'logic' of postcolonial African state-citizen relations,⁵ I highlight patronage as an intimate expectation of concrete 'help' from the state that, for Vaida, stood for a rightful return on her tax payments. In other words, the rightful return on tax payments is not necessarily restricted to public goods, but extends to social relationships and other 'goods' that people expect taxes to materialise (cf. Bear & Mathur 2015).

Proposing the idiom of 'the nurturing state', this chapter brings together recent anthropological insights on tax and reciprocity (Björklund Larsen 2018; Sheild Johansson 2020) with the rich anthropological corpus of the state as an intimate actor in citizens' life worlds (e.g. Meiu 2020; Mody 2008; Riggan 2013; Steinmüller 2010). The nurturing state is far from the right-wing trope of a so-called 'nanny state', which

⁵ See Bierschenk and Olivier de Sardan (2014) for a similar critique of neo-patrimonialism as the *de facto* mode of conceptualising the state in the anthropology of Africa.

indexes the kind of state that patronises citizens and limits their freedom with rules and regulations. The nurturing state, on the contrary, centres on citizens' expectations towards the state as a provider and life-giver, which does not limit freedom but provides the conditions of possibility to lead what many of my Ghanaian interlocutors described as 'decent lives'. Taxes as the fiscal flow between state institutions and citizens render the state feelable and knowable as an entity that 'receives' and is also expected to 'give' and 'return'. In this sense, Ghanaian citizens explicitly demanding 'a return' from the state for their tax payments contrasts with contexts where fiscal models of reciprocity are rejected, such as in Cochabamba, Bolivia (Sheild Johansson 2020: 18), where some taxes are understood as facilitating 'independence from the state', instead of 'interdependence within the state'. To historically contextualise how reciprocity emerged as the dominant exchange logic shaping popular attitudes to taxation in Ghana, I will first discuss the historical sources that describe how Ghanaians since colonial, and even precolonial, times understood taxation as a mode of exchange in return for immediate public benefit. The colonial era also witnessed the first documented popular sentiments of not 'receiving' enough, which animated many subsequent tax revolts and demands for fairer redistribution towards the late twentieth century (Aboagye & Hillbom 2020). However, while these sources suggest that Ghanaians have adhered to what seems like a fairly standard social contract model of taxation as reciprocal exchange (cf. Sheild Johansson 2020: 19), in this chapter, I argue that the mode of this exchange can take up qualitatively different forms. I suggest that Vaida's expectations centred on a particularly personalised and intimate form of reciprocity: direct *care* from agents of the state, which casts taxation as more than a technique of resource distribution or means of delivering public goods. Rather, taxes carry within them the uncanny potential of evoking sentiments 'desiring' agents of the state to act as providers and life-givers (High 2013; see also Buitron-Arias 2017), which complements existing rich evidence of African citizens' negative perceptions of state-administered taxation. Vaida's expectations that emerged in the aftermath of starting to pay tax provide an important clue towards the kind of Africanist fiscal anthropology that accounts for both acts of resistance and also hopes and aspirations of tax, which can incorporate a wide spectrum of sentiments and political visions. This line of inquiry also reveals hopes *towards the state* to emerge as a trustworthy agent of redistribution.

By accompanying Vaida on the journey of becoming a taxpayer, this chapter also interrogates how expectations for a specific kind of

personalised reciprocity can intersect and be at least partly shaped by events within one's life course – in Vaida's case, a divorce and becoming a sole proprietor of her enterprise. Taxation in this chapter thus attests as the kind of intimate state practice that weaves together political, often reformist visions of 'modern' fiscal citizenship and statehood (Likhovski 2007; Smith 2020), bureaucratic practices, and intimate desires and life projects. By tracing how this interweaving occurs within the process of registering an enterprise and obtaining a TIN, this chapter contributes further nuance to the concept of reciprocity in the anthropological tax literature (Björklund Larsen 2018; Sheild Johansson 2020), by broadening the spectrum of aspirations that local notions of reciprocity can elucidate.

Historicising the Ghanaian Fiscal Model of Reciprocity

Since Ghana became classified as a 'lower-middle income country' in the World Bank ranking of national economies in 2011, the nation's governments have faced a new landscape of conditions for accessing development finance and funding public spending. No longer considered as 'poor' (Moss & Majerowicz 2018), thanks to increasing oil revenues rather than structural transformation of the economy (Whitfield 2018), Ghana's share of official intergovernmental development and donor aid has reduced in the past years (Arhin, Kumi, & Adam 2018). Ghana's trajectory is in line with broader macroeconomic trends in Africa, where aid flows and commodity price fluctuations have become increasingly unpredictable, propelling a strategic move towards maximising 'self-financing' (Owen 2018: I). As one consequence, African governments have been keen to devise new mechanisms for 'widening the tax net' and incorporating the expansive informal sector (Meagher 2018). In Ghana, these macroeconomic shifts underpinned the narrative of 'Ghana beyond Aid' launched by the government led by the New Patriotic Party (NPP) in early 2017 when it assumed office (Kumi 2020). This narrative proposed that Ghana should become less dependent on external sources of funding and generate larger revenues from within the country, with taxation as an important mechanism of sourcing 'home-grown finance' (Ghana Communications Bureau 2018). Taxation has thus become conceived of as a macroeconomic necessity in Ghana, which derives from global shifts and the less favourable terms of foreign aid that accompany the rise in status in the World Bank hierarchy of national economies. Ghanaian state agents, such as the representative of GRA at the Business

Expo, emphasise the urgent civic duty, and in some register a 'Christian' obligation to pay tax, because the government needs these resources to deliver 'development'. In public communication, Ghanaian tax officials typically establish a firm connection between taxes and development, while reminding citizens that they are constantly 'reforming' the tax bureaucracy to ensure tax money is not mishandled.

While taxation is currently framed as an urgent matter to secure the basis of Ghana's development finance, it is important to understand the long-term exchange logics that have cast taxation as a matter of reciprocity. Of particular interest is the recent argument made about the uniqueness of Ghana's fiscal model of reciprocity in comparison to many other African countries, due to the entrenched nature of 'tax bargaining' in Ghana since the British colonial era (Aboagye & Hillbom 2020; see also Prichard 2015). Tax bargaining in this historical scholarship refers to the explicit demands that Ghanaian citizens have voiced towards the state to serve as a reciprocal agent when administering taxation, which means that whenever 'the state's reciprocity fell short of what taxpayers anticipated' (Aboagye & Hillbom 2020: 179), tax revolts ensued and political opposition was effectively mobilised against new tax policies.

The first documented case of this kind of tax bargaining is the institution of Poll Tax introduced in 1852 by the British colonial government. This was the first kind of 'direct tax' that the colonial administration attempted to establish in the coastal areas, aiming to consolidate the support of key interest groups by promising to use the tax revenue for public goods. The success of the colonial project hinged upon the promise of public goods, given that the British were facing powerful opposition from the Ashanti kingdom that ruled the inland area at that time. In drafting the new fiscal policy, British colonial officials recognised that the only way they could successfully implement taxation in the coastal areas was to incorporate regional traditional rulers, the chiefs, into the negotiation. Drawing on archival reports, Aboagye and Hillbom describe how the different interest groups came to an agreement:

At a meeting in April 1852, a fiscal contract was negotiated where the chiefs 'acting on behalf of themselves and their people' agreed to pay an annual sum of 1 shilling per head for every man, woman and child under British protection. The agreement stated that revenue from the tax, after the payment of stipends for chiefs and collection expenses, was to be devoted to the public good through investments in education, health care, the judicial system, and development of internal communications.

(Aboagye & Hillbom 2020: 187)

The Poll Tax quickly became unpopular. The majority of the revenue collected in the financial year of 1852–1853 was used to cover the salaries of centrally appointed tax collectors and colonial officials, as well as stipends for chiefs, which left a meagre amount for public investment. Out of the total sum of £6,656 collected, £45 was spent on schools and £470 on roads (Aboagye & Hillbom 2020: 188). In the end, people were unwilling to comply, because ‘the government failed to keep its part of the fiscal contract and did not provide the expected public goods the chiefs had bargained for in exchange for the payment of the poll tax’ (Aboagye & Hillbom 2020: 201). Major protests, including throwing stones at the British-appointed tax officials, erupted, led by the chiefs themselves, who felt they had also been betrayed in the process. The promised public improvements had not been delivered, while the chiefs had been excluded from the Legislative Assembly that had initially passed the Poll Tax ordinance, thus betraying the promise of representation (cf. Guyer 1992). Furthermore, suspicions of centrally appointed tax collectors misappropriating the tax money caused further strain on the fiscal project. As a result, the British colonial government withdrew the Poll Tax in 1861, declaring the tax a failed project that had resulted in loss of ‘faith in the white man’. Aboagye and Hillbom argue that the problem in any subsequent governmental effort to implement tax policies has lain in the mistrust towards state reciprocity, not least due to conceptions of power holders and bureaucrats misappropriating public funds, of which seeds, they argue, were sown in the colonial era. They trace a similar dynamic of tax bargaining in three other major tax revolts, including the 1995 attempt to introduce VAT following the transition to a democratic constitution in 1992. The first attempt failed due to popular sentiments of an ineffective government that was placing an unfair tax burden on the already suffering nation, with the 1980s economic hardships and International Monetary Fund (IMF)-administered structural adjustment programmes as the backdrop.

The liberalisation of the media had also begun at the beginning of the 1990s. Radio stations and newspapers emerged as important arenas for debating government failures, including food shortages, mass unemployment, and decaying infrastructure (Ufuoma 2012) – instead of critiquing structural adjustment programmes or the IMF, the public debate typically centred on politicians who were not doing their job or not using tax money to materialise public goods that could be ‘seen’ (Osei 2000). Supported by the media, in 1995, political opposition groups successfully rallied against VAT, and the ruling government, led by the National

Democratic Congress (NDC), had no choice but to withdraw the VAT bill. After winning the country's democratic elections in 1996, the NDC reintroduced the bill, this time around after careful preparation and ensuring that opposition forces and civil society groups were included in the negotiations. The VAT bill finally passed in 1998. At subsequent stages, oftentimes percentage increases in VAT have been tied to a public good (Atuguba 2006: 29), for example, the Ghana Educational Trust Fund.⁶

The prevalence of tax bargaining in Ghana, and the state's struggles and efforts to provide evidence that taxes are used for public benefit, suggests that Ghanaian taxpayers anticipate a specific kind of reciprocity from agents of the state: reciprocity that can be 'seen' and recognised in the immediate future. While reciprocity is not a universal exchange logic of taxation (Sheild Johansson 2020), anthropologists can explore why reciprocity might emerge as the mode of exchange underpinning taxation in one context, but not in another. While the insightful tax scholarship of Ghana has thus far historicised the apparent 'failure of reciprocity' since colonial times, we know less about why reciprocity would have emerged as an expectation in the first place, and whether it is possible to discern specific qualities of reciprocity that are expected, but not realised. These questions are useful in efforts to historicise hopes and aspirations of tax and understand the factors contributing to the *willingness* to pay tax.

For this type of inquiry, the Ghanaian history of chieftaincy offers valuable clues. Raymond Atuguba (2006) describes, drawing on oral history and archival records, that chiefs have been widely recognised as the rightful agents of public revenue collection 'in cash or kind' (Atuguba 2006: 9). They were traditionally the guardians of the Native Treasury, which funded communal projects. Explicitly communicating that these funds were used responsibly was central to the precolonial chieftaincy practice of mobilising revenue: 'Information about taxes and the purpose of the tax was often communicated to everyone. This could be done by the town crier or gong-gong beater or at a durbar organized for the purpose' (Atuguba 2006: 36). One can thus say that public communication and employment of various sensory signals, which drew *explicit* links between the levies contributed and the goods realised, contributed to a degree of tax compliance. Atuguba thus suggests that the conception of Ghanaians as 'culturally tax averse' is misleading. He goes as far as to

⁶ Please see the Value Added Tax (Amendment) Act 2018, Act 970, <https://globaltaxnews.ey.com/news/2018-5950-ghana-enacts-various-tax-amendments>. Last accessed 20 March 2020.

argue that ever since chiefs were excluded from the implementation of the Poll Tax in the nineteenth-century British protectorate, their lack of involvement has made centrally administered taxation a constant struggle. Evidently, chiefs did cultivate reciprocal relationships with their followers centred on notions of protection and the provision of well-being, which anthropologists have documented more widely (Sahlins & Graeber 2017: 73). At the same time, Ghanaian chiefs have also become subject to accusations of corruption and, most recently, using informal taxation to mobilise their subjects to vote for particular political candidates and undermine electoral competition (Bonoff 2016). In a similar vein, Lentz (1998) warns against framing an 'African moral matrix of legitimate governance' as radically different from the Euro-American paradigm, critiquing Bayart's ([1993] 2009) and Mbembe's (1992) analytics of African state power centred on 'images of "father and family", promises of "nurture and paternal care"'. It is thus crucial to retain a critical stance towards chiefs as conduits of legitimacy, given the constant popular re-evaluation of their accountability.

While I do not wish to essentialise an idea of African state power as centred on nurture and reciprocity, or claim that this represents radical alterity to Euro-America, there is much to be gained by zooming into the different kinds of expectations that paying taxes generates in a given ethnographic context.⁷ This type of anthropological inquiry furnishes a richer sense of the kind of relationships to the state that citizens expect taxes to materialise. These relationships may indeed exceed the idea of a social contract, but retain some sense of the state as being able to 'deliver', 'protect', and 'care'. These diverse qualities of reciprocity, I suggest, are not unique to Ghana, but reveal something more fundamental about taxes as potent monetary transfers within state–citizen fiscal relations.

Let me briefly illustrate how these different qualities of reciprocity could come into being through debates between tax officials and taxpayers. In February 2019, I attended a public tax forum that attracted a predominantly middle-class audience with some informal sector traders, who turned out to be the most vocal of participants. While the middle-class participants largely focused on ascertaining how taxes fund public infrastructure, the traders had other types of concerns. In the midst of the forum, the traders expressed their frustration with the local tax officials

⁷ As the history of taxation in Ghana has shown, if distrust towards the state has deep colonial roots, desires for a 'stronger state' that nurtures and cares cannot be divorced from postcolonial articulations of power and affect – an avenue for further research.

who typically appeared unannounced on their kiosk's doorstep demanding to see their tax records. If they had nothing to show, the officials threatened to close their shops and strip them of income. 'Us, we are entrepreneurs, and we do not understand the thing. I do not understand the amount I am supposed to pay,' said one of the female traders. She was also unhappy about the fact that taxes reduced her profit margins. Towards the end of the forum, she directly addressed the representatives of the local tax agency: 'Tax, we aren't even going to benefit anything, *so then that is a gift*' (emphasis mine). Later during the same forum, when the tax official asked the audience members to report the institutions and individuals who they knew were evading taxes, one of the traders asked: 'And what will *you* pay us?', which caused an eruption of laughter, amidst which the tax official continued trying to tell them that paying taxes was their 'civic duty'.

The Ghana tax administration's appeal to civic duty was fairly common in public platforms. In the Business Expo where I met Vaida, the Revenue Authority representative had appealed to the audience's Christian sensibilities. On such occasions, tax officials sought to entrench an idea that taxes are not paid for an immediate, tangible 'return', but to contribute to a long-term project of nation-building – or, meeting the ethical standards of good Christian citizenship. As such, the discourse of civic duty also implied that to demand an immediate return signalled Ghanaians' lack of understanding of what it means to be an appropriately 'modern' fiscal citizen – not by demanding an immediate benefit, but by internalising a concept of tax as materialising public goods in the long term. Instead of emphasising a sense of obligation towards fellow citizens (e.g. Björklund Larsen 2018: 21), Ghanaian tax officials typically explained that taxes were necessary for Ghana's 'development'. For middle-class and elite audiences in particular, the government also framed taxation as integral to economic freedom and decreasing dependence on foreign aid and loans from the IMF (Kauppinen 2020). This opens up another aspect of fiscal exchanges – taxation as a field of action where state agents and citizens negotiate the very *concept of tax*. In Ghana, debating the concept of tax centres on the quality of reciprocity: what citizens can reasonably expect 'in return' for taxes paid, and what kind of goods the state ought to deliver. In this sense, local debates about the concept of tax are both about the very meaning of being a taxpayer, and the status of tax as a monetary transfer that 'summons' a specific type of reciprocity.

The traders present in the forum did not buy into the discourse of civic duty, let alone the idea that paying taxes is 'ethical', redolent of virtuous

citizenship that requires postponing one's expectations of a material return. The idea of tax as a gift to the state, which the informal sector traders felt they were 'not going to benefit from', retained a sense of taxes as a monetary transfer that ought to materialise the kind of goods that make a difference for *their* everyday lives, in the here and now. Otherwise, tax is a gift. This raises a litany of important questions about the conceptual status of tax in the Ghanaian tax universe, which is structured according to varying expectations rather than a fixed ontological certainty. When taxes are conceptualised as gifts, they join a host of material and non-material transfers that anthropologists have analysed since the birth of the discipline, and create social relationships premised upon ethnographically specific notions of reciprocity⁸ (Björklund Larsen 2018: 3–4). For the trader who framed tax as a gift, in her understanding, the notion of taxes as a means to fund public infrastructure according to the model of a 'delivery state' (Olivier de Sardan 2014) was not sufficient. She was certainly aware of the notion of taxes as materialising public goods – but her comment points towards a horizon where tax bargaining, and fiscal models of reciprocity, may take other types of more personalised forms.

In the following sections, I further illustrate how fiscal models of reciprocity take up such personalised qualities by describing Vaida's journey through the Ghana tax system. While the quality of the fiscal contract I describe may be specific to Ghanaian lower class traders who had recently become taxpayers, Vaida's motivations for becoming a taxpayer draws attention to the intimate expectations that exceed the model of a functionalist delivery state (Bear & Mathur 2015: 21). First, I explore how becoming a taxpayer could intersect with social transitions and intimate desires within one's life course, and second, I explore how vernacular concepts of patronage and care structured the very mode of tax bargaining.

Becoming a Taxpayer: Husbands, Bureaucrats, and the TIN

Vaida met me at 6.30 in the morning at a busy traffic hub in Northern Accra, where we boarded a bus to the General Registrar. During the

⁸ To reiterate, on the emic level, taxes can as well be conceptualised as extraction, a *de facto* payment for 'service delivery', a mutual obligation towards others, or even as a contribution to a higher, cosmic order in the form of tribute paid to kings that does not need to be reciprocated (see Graeber & Sahlins 2017: 232).

journey in the fully packed, slow-moving bus, which we were hoping would take us to the state agency before it opened at 8.30 a.m., Vaida explained the difficulties she had faced with her previous husbands. She was a single mother of four children, two of which were adults living in the United Kingdom and the United States with their fathers. She was the sole carer for the two younger children, whose school fees and other expenses she was responsible for given that their father, her ex-husband, was no longer in the picture. With determination in her voice, she said, 'Today, I am going to register the company as sole proprietorship,' emphasising that the registration was her idea, and the business belonged to her alone.

Due to the typically intense Monday rush hour, we arrived at the Central Registrar at 9 a.m., by which time it was already packed with men and women waiting for their turn to speak to one of the employees along a row of cubicles behind plastic Perspex screens. The Central Registrar in the early 2010s was a typical public-facing Ghanaian state building: dark wood cubicles, beige walls, and relentlessly humming fans that were cooling down the hot tropical air. We took a ticket to wait for her turn and soon Vaida was called to speak to one of the attendees. She got the forms, but they were in English, which Vaida had not mastered to the level of making sense of the technical details and terms, nor was my rudimentary Twi sufficient to translate (in as much as I was simultaneously trying to deduce the meaning of the English tax terms). While we were trying to understand the kind of information required, a young male employee started helping her to fill in the form. He translated the documents for Vaida to ensure she obtained the right information and that she understood the content of the questions asked.

The first obstacle emerged at the moment of recording the name of Vaida's company. At the Business Expo, the representatives of GRA had advised her to pick a name that consists of the first initials of her children. So Vaida had come up with a name, 'As If'. To her disappointment, when one of the employees ran the name through the database, the name was already taken. Initially, she did not want to change the name as she liked it. Another young man waiting for his turn intervened and said she could use her father's name. After briefly considering, Vaida accepted the suggestion. We connected the name of her father with 'Ventures', ran it through the database check, and it was cleared. The young man filled the rest of the form quickly. She was pleased with the young gentleman and gave him four Ghana cedis (GHS) as a tip of sorts.

There was only one section in the form that made Vaida hesitant – the section in which she had to declare that the business was registered as

‘sole proprietorship’. Vaida turned to me and said that not mentioning her ex-husband would be ‘serious disrespect’ towards him. She seemed almost frightened about the possible consequences of making this declaration. Instructing the young man helping us, she told him to finalise the section as sole proprietorship, keeping her eyes fixed on the form as he crossed the appropriate square. The forms were completed. We were done.

At this point, Vaida was asked to go upstairs to a separate office to finalise the registration and obtain the TIN, which would be printed in each VAT form that she was now expected to fill for every transaction in her kiosk. She first went alone, but after five minutes, she came down and asked me to go with her. We entered a cold, air-conditioned office full of paper folders from floor to ceiling. In the middle of the folders sat a casually dressed male civil servant perusing the forms and speaking amicably to Vaida. When she had told him that a ‘white lady’ was accompanying her, the registrar official had asked to meet me, since he wanted to ask advice on doing a master’s degree in Europe. While he was entering Vaida’s details into the system, we were discussing the possibilities of obtaining scholarships for studying abroad, during which Vaida was looking at her watch and growing impatient. ‘Please, you are delaying me’, she told me, and as we were making our way out, the registrar official welcomed me back to ask more questions about registering a business in Ghana: ‘Most people do not do this. They do not want to pay tax,’ he said bluntly, commending Vaida for registering her company. Vaida seemed the least affected by this apparent compliment for her fulfilling her civic duty – she hurried me to leave as soon as we had finished the forms.

Back outside under the scorching midday sun, we decided to share a plate of *wakye* at a food joint nearby, which was a typical Ghanaian brunch consisting of rice, beans, egg, meat, and peppery sauce. Vaida was eating fast because she had to hurry back to her shop – someone had called her to tell her that an acquaintance who was meant to be looking after it had absconded. While anxious to return to her kiosk, she was satisfied with the results of the visit. She had the TIN, which she could start using immediately while waiting for her VAT forms to arrive.

Obtaining the TIN based on this description seems relatively straightforward: the whole process took less than three hours and Vaida received

help along the way. The officials were amicable and ensured that Vaida understood what the process was about. Meanwhile, the emotions Vaida experienced during the process reveal that registering her business was laden with intimate hopes and fears about the shift in the enterprise status. Registering her business under her own name was an act of asserting independence from her previous husband, with whom she had started the enterprise. Midway through filling the form, Vaida had stopped for a moment and acknowledged, more to herself than to anyone around her, that what she was doing was 'disrespect' (a commonly used English word in Ghana) towards her husband. Nevertheless, she carried on, determined to finish the process, pointing to the young gentleman where to place the tick to ensure the company was registered as her own.

While registering the business asserted independence from a previous marital relationship gone sour, Vaida came to align herself with the Ghanaian state apparatus by becoming a taxpayer. Becoming an 'agent of VAT collection' meant that Vaida was indirectly working for the state in collecting tax revenue, while she was also expected to pay income tax on her profits. However, given the personal circumstances and desires that she voiced at the Central Registrar, her motivation to become a taxpayer was not about performing a 'civic duty'. Following Vaida through the bureaucratic encounters, she was not anticipating commitments of honouring her tax obligations, nor was becoming a taxpayer a journey of ethical self-cultivation towards appropriately 'modern' fiscal citizenship. Although enticed to think of taxpaying as a Christian duty, as evidenced by the GRA's speech at the Business Expo, Vaida did not adopt the theologically engaged reflective stance to tax payments that was common among Ghanaian middle-class Christians (Kauppinen 2020). Nor was this shift in status laden with critical attitudes towards the mismanagement of taxpayers' money that characterised discourses of tax in the Ghanaian media, and in recorded history of Ghanaian tax revolts. Rather, becoming a taxpayer was part of an intimate journey of becoming the sole proprietor of her enterprise, which was laden with hopes of a new kind of future and power to decide the direction of her enterprise. This intimate journey underpinned Vaida's sense of the legitimacy of tax; becoming a sole proprietor was 'made real' through filling the forms, obtaining the TIN, and consequently becoming a taxpayer. Both statuses, sole proprietor and taxpayer, infused into each other within this journey. Thus, while Vaida seemed not invested in performing ideals of good citizenship, she did ethically reflect on whether registering her business and obtaining the TIN as sole proprietor was

right towards her ex-husband. In this case, becoming a taxpayer intersected with other social transitions and ideals of personhood: the desire to retain a sense of respect towards the father of her children, who perhaps once had shared her visions of the future.

Similar to many examples of state agents establishing their presence within intimate human life course, including law and legislators (Hasso 2014; Mody 2008) and public infrastructure (e.g. Riggan 2013), taxes ‘travel’ from the sphere of the intimate to the sphere of the bureaucratic, and vice versa, bringing together numerous overlapping and conflicting desires in the process. On the other hand, taxes can be conceptualised as transfers that exist within a space of cultural intimacy (Herzfeld [1997] 2016; Steinmüller 2010), in which the quality of state–citizen relationships realised is subject to contestation, experimentation, and affective negotiation. In some cases, these state artefacts can forcibly ‘intrude’ in the intimate life, and amount to a gendered mode of governance that purports to ‘protect’ and ‘nurture’, while entrenching class, age, gender, and racial difference (Hasso 2014: 107). In close dialogue with these uncanny potencies of taxes, I next discuss how becoming a taxpayer could simultaneously serve a pragmatic purpose while eliciting hopes for a new kind of relationship to the state as a more benevolent ‘intruder’. Just like a marriage might be experienced as an ‘investment’ laden with (material and immaterial) hopes and desires, entering into a new relationship with the state through tax payments can come with desires for obtaining a specific social status, and tangible *recognition* as a legible fiscal contributor (Vicol 2020). Centring on the notion of patronage as a form of care, taxes as transfers bring into being distinctive expectations of reciprocity at the heart of the ‘nurturing state’, which are as real as they are fragile, as Vaida eventually experienced.

Expecting a Rightful Return: Tax as Patronage

A couple of weeks after registering her business and dutifully filling a VAT form after every purchase, Vaida gave me a phone call, sounding distressed. She asked if I had heard anything from the GRA representatives we had met at the Business Expo. Vaida explained that she was waiting for them to come to her shop and ‘advise’ her on building her business, and getting a loan to buy a bigger container and a vehicle to transport larger amounts of cement from Aflao to Accra. Also, she thought that she could start selling cement to ministries and other state agencies that were building new infrastructure, including the recently

opened Ministry of Defence at a prime spot on the way to the Accra Kotoka International Airport. She had tried calling the number she had scribbled down after seeing the advertisement for Business Expo, but the number belonged to an event management company, who had no direct line to the GRA. Calling the GRA directly did not bear fruit; it was difficult to get an answer, and people did not 'sound friendly'. And contrary to her expectation that I was in regular contact with the GRA and could provide a direct line of access, I could not help Vaida.

Two weeks after formalising her business and entering into an official relationship with the GRA, Vaida was growing disappointed with the lack of tangible evidence of the benefit of this shift in her company status. The business was still the same: she sold cement from the same container, to the same customers, in the same spot in Accra's outskirts. In the aftermath of starting to pay tax, Vaida understood the state as an entity of which human agents were going to be regular patrons of her business – people who would discuss business strategy with her, bring her new customers, and facilitate access to the Ghanaian banking system. After all, she was doing 'her part' – dutifully filling the VAT forms for every purchase, and to the best of my knowledge, also paying personal income tax.

It was clear that Vaida's notion of reciprocity involved the right to personalised help and care. While this can be taken as an example of patronage, in the sense that Vaida thought tax payments included her in an expansive network of relationships that offered support, it is far from an essentialized 'logic' characterising 'a post-colonial mode of governance' (Lentz 1998: 47). At its core, patronage in this case was the 'rightful return' on Vaida's tax payments – it was not a mode of governance, but what Vaida sought to secure by becoming a taxpayer and anticipating a specific type of reciprocity. Above all, taxes were not 'gifts' or personally disinterested, altruistic contributions to the nation-state, or instrumental transactions intended to secure state support. Patronage as the rightful return sat somewhere in the middle within this wide spectrum of characteristics of taxation as the transactional mode. It was an intimate expectation, also laden with hopes for new business associates, having lost her husband's support that had been instrumental to starting and running her business previously. And it was instrumental, centred on an expectation of fairly immediate 'return'.

In this sense, it is possible to argue that taxes can evoke desires for the state to 'serve' as a productive agent within one's life course (High 2013), which furnishes a counterpoint to the paradigm of taxation as primarily a mode of power and governance. While states everywhere can make

comparable statements of ‘nurturing’ their citizens as a mode of exercising power, this kind of hermeneutics can overlook citizens’ actual desires and motivations that charge tax payments with expectations of a rightful return – and specific modes of reciprocity, recognition, and belonging. While some anthropologists have drawn on anthropologically oriented ‘psychoanalytics’ to explain why people continue to align with agents of the state, even when state projects constantly fail to deliver the ‘greater good’ (High 2013), these ‘desires for the state’ can also be explained by investigating the notions of reciprocity that underpin these alignments. Becoming a taxpayer represents one instance of such alignment, which in Ghana involves negotiation between bureaucrats and citizens on the precise conceptual status of tax as a monetary transfer. Vaida’s example, and the ethnography on public tax forums in Accra, demonstrates that contesting the quality of the reciprocal expectations between the state and citizens characterises the content and form of this on-the-ground conceptual debate. As a consequence, in Ghana currently, tax is an exceptionally potent local concept that stands at once for a civic duty, theological dogma, gift, perhaps even ‘investment’, and a personalised transfer that secures new kinds of social relations.

Conclusion

Anthropologists and sociologists have long since shown that monetary transfers, from gifts of money (Gutiérrez Garca 2019) to tithes (Haynes 2013), or even insurance payments (Zelizer 2017), carry the potential of consolidating a special type of relationship between the transactors. Contrary to what seems like the Enlightenment common sense, monetary transfers are not necessarily socially corrosive but create and consolidate affective relationships. For a long time, taxation stood outside this type of analytical rubric in anthropology, perhaps due to the fact that it was not conceptualised as particularly ‘social’ – however, this has changed and taxes are currently seen as key to creating relationships within and beyond the state (Björklund Larsen 2018: 4–5).

This chapter has demonstrated taxes as affective mediums of state–citizen relations and proposed the notion of the nurturing state to think through the potency of tax. As a comparative concept, idioms of the nurturing state may draw on varying notions of reciprocity that characterise everyday ‘tax bargaining’. Notions of reciprocity are highly variable even within a single polity such as Ghana, where middle-class Pentecostal Christians and informal sector traders, of which many can also be

Christians, seem to operate within different expectations of reciprocity. Ethnographic methods are ideally suited to uncover these varied ‘qualities’ of reciprocity sought across class, gender, race, and other axes of social hierarchy. Beyond Ghana, anthropologists can unearth other models of the nurturing state by paying close attention to what citizens expect to materialise through tax payments, and the kind of life projects that underpin these desires.

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