



Review of the NGO Coalition for “Improving Transparency in Extractive Industries” on final validation report

The final Validation Report (later referred as report) presented by RCS Global company was discussed at the Coalition Council’s meeting on March 10, 2015. Following conclusions were made as a result of the discussion:

1. As of comparison of the draft and final reports, experts of the NGO Coalition revealed that although some of comments such as CSO Protocol and decision of International EITI Board were taken into account other important comments still were not addressed.
2. The Validation report is poorly prepared, inaccuracies are in presence. There is no logical connection between the report’s description and assessment part. It is not clear which of the EITI’s 7 requirements were met and which were not. As the methodology of the validation is weak, it is not clear how sub-requirements were presented in the report. Thus it is not clear how a single opinion on any requirement was made in case of evaluation of several sub-requirements. Although validators made evaluation indicators of “limited progress”, “meaningful progress” or “requirement met”, it is not clear how what played the basis role when making conclusions. At the same time, the fact that validators did not refer to concrete sources, puts objectivity of the report under question.
3. Views of different interest groups representing NGO of the country were not reflected in the report, since meeting agenda was not discussed in advance, nor proposals and recommendations of the NGO Coalition were taken into account. Meeting with Coalition members were not organized professionally and views of other NGO representatives were not taken into account. Thus part 1 of the report on situation around NGO in country should not be considered final and do not reflect the real situation in proper and objective way.
4. CSO protocol evaluation was added to the report later. Views and thoughts of NGO were partly taken into account when preparing review to this part of the report. Views and approach of both government and NGO were not indicated; mutual and differing ideas were also not stated. Application of such

methodology does not allow to observe existing problems and opportunities for NGO to participate in EITI process.

5. Regarding recommendations of validators on improvement of NGO participation in EITI process, Coalition Council thinks that realization of some of these recommendations might create additional problems.
6. Finally, NGO Coalition thinks that validation process cannot be considered completed taken into account the fact that it was based on 2013 draft EITI report and workplan for 2015 that was not approved by MSG. Thus, taking into account that validation report was poorly prepared, conclusions were not based on necessary proofs, NGO Coalition recommends to stop the validation process in this stage and continue it after 2013 EITI report will be approved by MSG.