Country: TIMOR-LESTE  
Organization: TL-EITI  
Contact details: Elda Guterres da Silva, TL-EITI National Coordinatos

We welcome any comments to the paper EITI in 3-5 years - Validation. Stakeholders may wish to address the questions and statements below, but should not consider themselves confined to them. Stakeholders are welcome to provide alternative proposals.

<table>
<thead>
<tr>
<th>GUIDING QUESTION</th>
<th>MSG RESPONSE</th>
</tr>
</thead>
</table>
| 1. Should effort and progress in meeting the requirements over time be taken into account in validation? | • This element can only be achievable and measurable if EITI Secretariat has well documented minutes otherwise it will be difficult for Validator to measure and arrive their conclusion on this element.  
  • This is important and very helpful to the TL-EITI Secretariat and Validator, otherwise it will be easy for documentation process.  
  • Each countries has its own circumstances to meet the precise requirements. exp. In timor-leste we only have two production field with different product, disclosing the information by commodity is sensitive. TL MSG publish production data as aggregated information. |
| 2. Should validation encourage reporting that go beyond the EITI requirements?    | • I am not sure how much EITI could influence this despite the reporting coverage extended other aspects beyond EITI core subject.  
  • Not sure, but if the EITI secretariat can influence this reporting to cover others aspects beyond the EITI, the EITI report will be preferable  
  • Payments from industries to state is transparent and is a model. But timor-leste need to improve transparency in budget implementation. Validation process should encourage this point in Timor-Leste |
| 3. Should the timeframe for countries to achieve compliance be the same for all implementing countries? If so, should the timeframe be a fixed number of years as at present | • Each country has its specific challenges in nature and maturity of the extractive sector and structural challenges its has, hence timeframe for achieving compliance status should differ.  
  • For each country to achieve compliance implementing it’s not same for all, cause each country has its specific timeframe. Need two years for achieve implementation |
| 4. Should progress and direction of travel matter for how much time countries are given to achieve compliance? | • At least tentative timeframe shall be given which enable the country to strive for it.  
  • At least tentative timeframe shall be given for the country to achieve compliance not more than three years |
<p>| | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
</table>
| **5.** | To what extent should the local context in which the EITI is being implemented be taken into account during validation? | - Local context might have it unique challenges, these are - legal framework, coordination within institutional level, readiness of candidate country in resources  
- Local context might have are legal framework, coordination within institutional level, readiness of data production resources and contract  
- Should be consider case by case |
| **6.** | Should EITI requirements continue to be assessed as met or unmet? | Agree  
Should consider statment in point 1 |
| **7.** | Should there be more disaggregated assessments, showing which requirements are met and which requirements are unmet, including the level of progress in meeting each requirement? | Agree  
It is a difficult question to answer considering there will always be robust discussion within MSG |
| **8.** | Should there be more disaggregated assessments, showing which requirements are met and which requirements are unmet, including the level of progress in meeting each requirement? | Agree  
Same question as question nu 7 |
| **9.** | How can validation measure progress or direction of travel towards meeting a requirement? | - Through scheduling of each stage and milestone of each stages being achieved  
- Through scheduling of the reporting as well as meeting and discussion at the MSG level in each country  
- Through information included in each countries EITI report and compare annual progress/ improvement. |
| **10.** | Should validation take place more frequently to measure progress, for example at the end of each EITI reporting cycle, or is the current frequency of every 3 years adequate? | Every 3 years is sufficient |
| **11.** | Should the concept of “Candidate” and “Compliant” be replaced, and if so with what? | Keep it |
| **12.** | What terminology could be suitable to indicate the various degrees of | With elaborative footnote will enhance those terminologies used |
progress in meeting EITI Requirements? Are the current concepts of “limited progress” and “meaningful progress” appropriate?

13. How can Validation incentivize countries to continue to progress and innovate both before and after reaching compliance status?

- To keep compliant country maintaining their status otherwise the tendency to relax could be unavoidable
- Discussion with each pillars within MSG is a good practice.
- Where the validation report includes population’s direct opinion it could be channel for expression of community aspiration on government’s performance. And also assist MSG in meeting its objective.

14. Should multi-stakeholder groups and/or local and international experts on extractive sector governance have a greater role in Validation?

- Yes to some degree
- Maintain current arrangement to allow independent validation process

15. Should the International Secretariat have a greater role in carrying out Validation assessments? What are the risks and benefits of this approach? What should be done to mitigate conflicts of interest?

- This will depend on how independent the International Secretariat towards certain country from political influence,
- Risk – can be bias towards certain country
- Benefits – Secretariat is knowledgable than any private company appointed as validator.
  - International Secretariat has more knowledge in difficulties faced by each countries
  - Mitigation - A standard validation checklist that is transparent and accountable and less subjectivity or judgement.

Approved by MSG:

Date: 14 August 2015

1. Alfredo Pires
2. Angelina B. Branco
3. Jose M. Lobato
4. Henrique Monteiro
5. Agostinho G. Ramos
6. Nelson Sanchez Miranda
7. Elda Gutteres da Silva
8. Angelo Lay (comment submitted by email)
9. Oscar Sanchez Faria
10. Fernando Carvalho da Silva
11. Timoteo Pires
12. Tobias
13. Elga Anita. T.Pereira
14. Auxiliadora Coelho
15. Nery Filipe Bernardo
16. Antonio dos Santos
17. Luis Martins Gosmão
18. David de Araujo
19. Sabino Fitun
20. Alzira dos Reis
21. Martinha da Silva
22. Aurelia Rodrigues
23. Helio Dias da Silva

-------------------------------------------------------------------------------------------------------------