

Dear Sirs
EITI International Secretariat
Oslo, Norway

São Tomé, 11 May 2020.

Comments from the São Tomé and Príncipe National Committee regarding the 3rd validation preliminary assessment

The EITI National Secretariat of São Tomé and Príncipe was requested to provide comments to the International Secretariat about the preliminary assessment of the 3rd validation process to which São Tomé and Príncipe has been submitted, starting on 29 December of 2019.

This assessment is evaluating the success in implementing the corrective actions included in the EITI Administrative Council recommendation as regards the following requirements:

- Requirement 2.2 Allocation of licenses;
- Requirement 2.3 Register of licenses;
- Requirement 4.9 Data and quality assurance.

The National Secretariat submitted the document received by the International Secretariat for analysis and comments. It was not possible to hold the National Committee meeting, as is normal practice, to discuss the evolution of the implementation and compliance with the requirements outlined above, as it coincided with the Covid-19 pandemic and the restrictions resulting from the state of emergency declared by the São Tomean state. The National Secretariat contacted institutional members of the National Committee directly, in the ways possible given the current context. Of the institutions contacted, the comments from the National Petroleum Agency (ANP), the São Tomean Register and Public Information Office, the Federation of Non-Governmental Organizations and the company representative on the National Committee, Kosmos Energy were relevant. The following provides a summary of the comments received:

The EITI National Committee believes that, as a result of the delay to the start of oil production, control measures implemented by this body have had little impact over the last two years. However, they reiterated the aim of continuing efforts to improve implementation. As regards the International Secretariat proposal to make adjustments and adaptations to the implementation process as a way of reducing costs and strengthening the role of member-institutions such as the ANP and the Registry and Public Information Office.

ANP, stated that, in the case of “contracts signed after the first auction, no difficulties have been encountered in identifying

the date the application was made by the company. However, taking into account the weaknesses in the ANP institutional filing system, there are practical barriers to locating application letters with the dates they were sent by the companies, in the cases of direct negotiation. The date available to the public and published on the ANP-STP website are the dates of the announcements following the statement of interest submitted by the company and can be made available on the website.”

They also consider “that there are practical barriers with the current ANP-STP website as regards maintaining a register or registry system available to the public that includes relevant and comprehensive information about the application dates for each of the licenses. Renovation of the ANP website to overcome these barriers is set out in the budget and work plan for 2020.”

ANP-STP reminds that it has already exercised its right to audit all petroleum companies, contrary to that stated in the 2016-2017 Report.

The EITI National Secretariat is still available to provide further information to the International Secretariat as required to fully clarify any of the required information or remaining doubts in relation to the validation process.

Yours sincerely,



José Cardoso

