

[Sierra Leone, 2022]

MSG review of the outcomes and impact of the EITI

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Introduction

Regular disclosure of extractive industry data is of little practical use without public awareness, understanding of what the figures mean, and public debate about how resource revenues can be used effectively. The EITI Requirements related to outcomes and impact seeks to ensure that stakeholders are engaged in dialogue about natural resource revenue management. EITI disclosures lead to the fulfilment of the EITI Principles by contributing to wider public debate. It is also vital that lessons learnt during implementation are acted upon, that recommendations from EITI implementations are considered and acted on where appropriate and that EITI implementation is on a stable, sustainable footing.

The multi-stakeholder group may use this template to monitor the outcomes and impact of EITI implementation. Where information is already available elsewhere, it is sufficient to include a link to other publicly available documentation. The scope of this template reflects EITI Requirement 1.5 on work plan and Requirements 7.1 to 7.4 on outcomes and impact.

The MSG is required to review the outcomes and impact of EITI implementation annually (Requirement 7.4). The MSG is encouraged to update this document annually to monitor progress, keep track of efforts to improve data accessibility and inform work planning.

To inform Validation, the MSG is required to submit the completed form to the International Secretariat Validation team by the Validation commencement date. The period captured in this review may be the period since the previous Validation or the previous calendar/fiscal year. The MSG should clearly indicate the period covered by its review.

The MSG's annual review of the outcomes and impact of EITI implementation should be publicly available, and stakeholders beyond MSG members should have an opportunity to provide feedback on the EITI process (Requirement 7.4).

Part I: Relevance of EITI implementation

Work plan (Requirement 1.5)

1. Basic information about the current EITI work plan.

Period covered by the current EITI work plan	January to December 2022
Information on how the public can access the work plan.	The SLEITI MSG Work plans can be accessed on the SLEITI website. Please see below: 2022 SLEITI Work plan 2021 SLEITI Work plan 2020 SLEITI Work plan 2018-2019 SLEITI Work plan
Process for producing the current EITI work plan	[Summarise the process here. Include references to MSG meetings and other events where the work plan was discussed.] The development of the 2022 work plan commenced with a review of the implementation of activities contained in the 2021 Work Plan. The SLEITI Secretariat submitted a draft work plan at an MSG meeting on 10 th March 2022. Please see minutes here - <u>Minutes of MSG meeting</u> . Led by the CSO constituency on the SLEITI MSG, a wider stakeholder consultative meeting was held on 21 st March 2022 where the 2022 work plan was tabled for discussion and updated to ensure that its reflects stakeholders views and aligned national development priorities and current issues affecting

Template MSG review of the outcomes and impact of EITI December 2020 the extractive sector. Please see photo gallery for pictures of the session here: <u>Stakeholder</u> consultation on the development of 2022 work plan and report here: Report on 2022 work plan development In addition, the draft work plan was also shared to donor partners (World Bank, GIZ, UNDP, and OSIWA), OGP, EITI International Secretariat. Feedback received from the consultative process was incorporated into the final draft work plan. Through this consultative process. EITI implementation priorities were identified and incorporated into the work plan. The final work plan was approved by the MSG on 24th March 2022. MSG approval of the work plan [24th March 2022] – The minutes is available here: Minutes of MSG Meeting

2. Explain how the work plan's objectives reflect national priorities for the extractive industry. Provide links to supporting documentation, such as studies or national development plans, if available.

The work plan objectives have been developed to ensure that SLEITI process contributes to government reforms on Beneficial Ownership Disclosure, Gender empowerment, mainstreaming EITI reporting through systematic disclosure of data, and the environment. It was also geared towards making certain that EITI implementation contributes to efficient natural resource governance.

Beneficial Ownership (BO): This is linked to cluster two of the <u>Medium Term National</u> <u>Development Plan</u> (2019-2023) on diversifying the economy and promoting growth. Pages 83-84 zero in on improving the management of oil, gas, and mineral resources.

The requirement on Beneficial Ownership disclosure is a key government priority. To ensure its implementation, H.E. President Maada Bio attended the Africa Beneficial Ownership Conference in Dakar in 2018 and made a commitment to legislate laws that will ensure mandatory BO disclosure in Sierra Leone. Please see link to the <u>Statement delivered by H.E.</u> <u>President Maada Bio at the Africa BO Conference in Senegal</u> and <u>State House news on</u> <u>President Bio's commitment to EITI</u>.

The new Mines and Minerals Development Bill provides for mandatory disclosure of beneficial owners of corporate entities. The Bill is available <u>here</u>.

To enhance BO disclosure, the MSG has completed a study on Beneficial Ownership

Transparency in Sierra Leone. The report can be found here- BO Report.

Also, the <u>Open Government Partnership Action Plan</u> included Beneficial Ownership Transparency in its commitment.

Systematic Disclosure of EITI Data: This is linked to cluster two of the <u>Medium Term National</u> <u>Development Plan</u> (2019-2023) on diversifying the economy and promoting growth. It states that by 2023, Government will "mainstream transparency and accountability practices into the sector according to the EITI Standard. Please see page 84 of the MTNDP (2019 -2023).

To enhance systematic disclosure, the MSG has completed a feasibility study on mainstreaming EITI Data through government and company systems. The report can be accessed <u>here</u>.

Gender Empowerment Act: Government priorities on gender empowerment are contained in the Gender Empowerment Bill. The Bill seeks to promote gender equality and other related matters. This is in line with EITI Requirement on gender.

Environment: The creation of a standalone Ministry of Environment reflects government commitments to environmental protection and addressing the issues of climate change, and energy transition.

Implementation of EITI Corrective Actions and Recommendations and Dissemination of SLEITI Reports were prioritized in the work plan to enhance reforms in the sector and generate dialogue and public debate on natural resource governance.

3. Optional question: Has the MSG developed a theory of change on how EITI implementation will address the identified challenges of the sector in your country? If yes, please reference the corresponding document here.

No. the MSG has not developed a Theory of Change.

Monitoring progress

4. Provide an overview of activities undertaken in the period under review and progress in achieving the objectives of the previous work plan. The MSG is encouraged to provide a summary here and to document progress in more detail in the work plan itself.

In the period under review, activities undertaken by the MSG have contributed to reforms in the sector, transparency and accountability in the collection and utilization of revenues, availability of extractive sectors data, and improve collaboration among relevant Ministries, Departments and Agencies (MDAs).

Reports Production: The MSG has published two EITI reports covering 2017-2018, and 2019. These reports can be accessed <u>here</u>.

Reports Dissemination: The MSG successfully implemented a nationwide dissemination of the 2017 -2018 EITI report. The dissemination report can be accessed <u>here</u>.

Strengthening EITI Implementation: The MSG implemented activities to strengthen the capacity of CSOs working on natural resource governance and environment on how their participation will enhance EITI implementation. One such activity was a one-day workshop on the EITI process and the news report is available <u>here</u>.

Validation Corrective Actions: Following the receipt of the 2018 Validation Report, the MSG disseminated information on the report to citizens and stakeholders through several means of communication including <u>Press releases</u>. To enhance MSG governance which was a key corrective action, the MSG developed a new <u>MoU</u> to reflect the specific provisions of Requirement 1.4 of the 2019 EITI Standard. The MoU was signed by the three constituencies on the MSG.

Visibility and Awareness Raising: To improve SLEITI's visibility, the MSG implemented the following:

- a) Advertorial The <u>advertorial</u> provides an overview of EITI implementation and the composition and role of the MSG.
- b) **TV Hour** The <u>SLEITI TV Hour</u> was implemented to raise awareness and deepen understanding about the SLEITI process, including receiving feedback from stakeholders about its implementation.

Capacity Building:

- The MSG implemented a one-day orientation and refresher workshop for MSG members and Secretariat staff on EITI implementation. Please see link to the workshop report here <u>Workshop report</u>.
- The MSG and other stakeholders received virtual (Zoom) training on Beneficial Ownership Disclosure from the consultant for Beneficial Ownership study. This contributed to strengthening the definition of BO in the new Mines and Minerals Development Act.
- With technical support from the EITI international Secretariat, the MSG and relevant stakeholders received training on systematic disclosure. The workshop equipped stakeholders with the necessary approaches to regularize routine online disclosure.
- The MSG implemented a two-day residential workshop on the new Validation procedure and completion of the Validation templates. The Workshop news is available here - <u>Pre-Validation workshop in Bo</u>. This workshop equipped the MSG to undertake the completion of the three Validation templates without recourse to a consultant. Please see news report here-<u>MSG complete Validation templates</u>.

Planning:

The MSG held a two-day workshop in Kenema to review the 2018 Validation corrective

actions and to develop the 2020 work plan. During the sessions, the MSG approved the work plan objectives, 2020-2023 Communication Strategy objectives, and the ToR for the production of the 2017-2018 reports. The retreat report is available <u>here</u>.

 The MSG also completed two major studies on a) Assessment of the Impact of EITI and the Socio-economic Benefits Derived from Subnational Extractive Revenues by Mining Communities which is available <u>here</u> and b) <u>a Feasibility Study</u> for Mainstreaming EITI Reporting in Sierra Leone.

Please see below links to the Annual Progress Reports for 2019-2021.

Work Plan Monitoring Report 2021

Work Plan Monitoring Report 2020

Annual Progress Report 2019

5. Provide an overview of the multi-stakeholder group's responses to and progress made in addressing the recommendations from EITI reporting and Validation and gaps in information in accordance with Requirement 7.3.

The multi-stakeholder group is required to list each recommendation and the corresponding activities that have been undertaken to address the recommendations and the level of progress in implementing each recommendation. Where the government or the multi-stakeholder group has decided not to implement a recommendation, it is required that the multi-stakeholder group documents the rationale.

a) 2018 Validation Recommendation and Progress

Recommendation:	Status/progress:
	[Has the recommendation been partly or fully addressed? How is the MSG following up on the recommendation? Has the MSG identified an agency or actor responsible for addressing the recommendation? If the MSG has decided not to implement the recommendation, please document the rationale.]
Company engagement (#1.2) Revitalise the Chamber of Mines and ensure the EITI implementation objectives are consistent with priorities of the industry constituency, and by ensuring concerns of the industry are adequately reflected at the MSG and in EITI reporting.	Yes, this has been fully addressed. Through the efforts of the MSG, the Chamber of Mines has been revitalized. The membership of the Chamber currently comprises five (5) major mining companies (Vimetco, Koidu Holdings, Sierra Rutile/Iluka, Sierra Diamonds, and Wonghor). As a result of the revitalized Chamber of Mines, industry participation on the SLEITI process has significantly improved.

 CIVIL SOCIETY ENGAGEMENT(#1.3) All interested civil society stakeholders must be able to fully, actively and effectively engage in the EITI process. The constituency may wish to formalise further the constituency's engagement in the EITI process, to strengthen coordination between MSG members and the broader constituency. The constituency is also encouraged to ensure that all agreed policies, rules and documents are publicised online and regularly shared with the wider constituency. They may wish to ensure communication channels are formalised and regularly monitored and refreshed 	Yes, fully addressed. In accordance with the SLEITI MSG MoU, the CSO constituency has been refreshed and its membership increased from three to six. This has improved CSO participation and coordination on the SLEITI process.
 MSG governance and functioning (#1.4) The updated MSG MoU & Internal Rules to <i>clearly</i> cover all provisions of Requirement 1.4.b & deviations publicly noted and addressed. Civil society and companies should formalise channels for wider constituency engagement by developing, agreeing and publishing procedures for nominating and changing MSG representatives in an open and transparent manner. The MSG is also encouraged to consider keeping public attendance records and publishing MSG minutes online, to ensure greater transparency of the MSG's discussions and decisions. 	Yes, fully addressed. The MoU and Internal Rules have been updated and provide procedures for nominating and changing MSG members in accordance with Requirement 1.4b. The updated MSG MoU can be accessed <u>here</u> . Civil society groups on the MSG have a ToR which governs their internal procedures and engagement with the wider constituency. The ToR can be accessed here - <u>ToR for CSO engagement on the</u> <u>MSG</u> . In order to effectively participate in the SLEITI process, the Chamber of Mines engages with all its constituents through email circulars and WhatsApp. This approach has significantly improved and strengthened industry representation on the MSG.
 Work plan (#1.5) Sierra Leone must ensure that its EITI work plan is updated annually through wider consultations. License allocations (#2.2) Sierra Leone should publicly disclose the procedures for awarding and transferring all extractives licenses, including specific technical and financial criteria and any non-trivial deviations from the applicable legal and regulatory framework. 	Yes, fully addressed. The 2022 work plan was developed through wider consultations. The work plan can be accessed here: <u>2022 SLEITI Work plan</u> Yes, partially addressed. The 2019 report shows that the license allocations were done in accordance with the law and regulations with non-trivial deviation. The procedure for awarding and transferring licenses
regulatory framework.	The procedure for awarding and transferring licenses is publicly disclosed, but the deliberations and minutes of the Minerals Advisory Board are not published thus the MSG rating of partially addressed. The MSG will continue to engage the relevant stakeholders to ensure that the decision making process of the Mines and Minerals Advisory Board

State-participation (#2.6) Details on loans and guarantees to extractive companies should be clarified including details of transactions. Sierra Leone is urged to revisit such issues annually, to ensure comprehensive reporting of the state's participation in the extractive sector.	for the award and transfer of licenses are publicly disclosed by way of publishing the Minutes of meetings of the Minerals Advisory Board in order to fully address this recommendation. The 2019 SLEITI <u>Report</u> showed that there was no State participation in the mining sector in the period under review and the MSG agrees. In 2021, the MSG noted Government participation in the sector with up to 10% free carried interest in Marampa Mines, and a 100% shareholding in the Rail and Port Infrastructure as evidenced in the Railways and Port Lease Agreement between the Government of Sierra Leone and Kingho Railway and Port Limited. The MSG has noted this state participation and will monitor and report on this requirement in the next reporting round.
PRODUCTION DATA (#3.2) In accordance with Requirement 3.2, the Government of Sierra Leone should ensure that all production volumes and values, including for the ASM subsector, is publicly accessible and reported on.	Yes, fully addressed. Large scale mining production volumes and values were provided and included in the SLEITI 2019 report. Regarding ASM production, The National Minerals Agency (NMA) produced a base line study on ASM which includes an estimation of ASM production. The study report can be accessed <u>here</u>
 Comprehensiveness (#4.1) - Comprehensive disclosure of taxes & revenues Include all significant payments and revenues in determining material revenue streams. Document /justify omissions. Government to unilaterally report all government revenues from the extractive sector, by individual revenue stream, regardless of its inclusion in the reconciliation exercise. 	Yes, fully addressed. The recommendation was addressed in the 2017- 2018 report which can be found <u>here</u> . All material revenues in the mining sector (by revenue stream) were captured and included in the scope of SLEITI report 2019.
Barter and infrastructure transactions (#4.3) Consider & include in report any agreement, or set of agreements, involving the provisions of goods and services (including loans, grants and infrastructure works), in full or partial exchange for oil, gas or mining exploration or production rights.	Yes, fully addressed. The MSG has agreed that the requirement on Barter and Infrastructure is not applicable to Sierra Leone. The 2019 SLEITI report is available <u>here</u> . The minutes of the MSG minutes of 24 th September 2021 where the MSG discussed this requirement can be found here- <u>Minutes of SLEITI MSG Meeting</u> .
Subnational direct payments (#4.6)- Undertake a comprehensive review of which direct taxes and levies extractive companies are subject to at subnational level. Ensure that reporting mechanisms are	Yes, fully addressed. In the year under review, the MSG agreed that Surface rent is the only subnational direct payment in Sierra Leone. This information is documented in

established which allow for estimation of total subnational payments in Sierra Leone, to	the 2019 SLEITI report.
determine whether payments in Sierra Leone, to determine whether payments are material. Provide comprehensive explanation of how such payments are determined, paid, and managed. Where material, the Sierra Leone should ensure that reconciled information on all companies' payments to subnational government entities and the collection of payments are publicly accessible.	In order to ensure a comprehensive reporting of the subnational payments, the IA requested from companies selected in the scope to report any other subnational direct payments other than surface rental in separate line. The mining companies and government entities did not report any other subnational direct payments other than surface rent.
 Data quality (#4.9) Agree on reporting templates ahead of data collection Ensure that the IA's submission of clear 	Yes, fully addressed. The IA shared draft reporting templates with the MSG ahead of 2019 data collection phase. The draft templates were included in the scoping report of the 2019 report.
 and categorical assessment of comprehensiveness and reliability of the (financial) data presented. IA access whether all reporting entities within the agreed scope provided the requested information. IA disclose gaps or weaknesses in reporting, including the entities that failed to comply with the agreed procedures, and an assessment of whether this is likely to have had material impact on the comprehensiveness and reliability of the report. 	 -The Auditor General, the national auditing authority certified all Government agencies reporting templates. -Mining companies selected in the scope submitted their certified reporting templates by senior management and a certified external auditor. -The IA disclosed in the 2019 report the material companies that did not comply with the reporting procedures and the MSG agrees that this did not have any material impact on the comprehensiveness
 Sub-national transfers (#5.2) In accordance with Requirement 5.2, Sierra Leone should ensure that subnational transfers of extractive sector revenues are publicly disclosed when such transfers are mandated by national law or other revenue sharing mechanism. In addition, Sierra Leone should publish the detailed transfer amounts calculated in accordance with the relevant revenue formulas to each subnational entity under both the Diamond Area Community Development Fund (DACDF) and surface rent payments that are distributed by central government agencies. Lastly, Sierra Leone should ensure actual transfers are disclosed in detail, reconciled and summarised, highlighting any deviation from statutory calculations. 	 and reliability of the report. Yes, partially addressed. The MSG agreed that DACDF is the only mandated subnational transfer in Sierra Leone. This is reflected on page 56 of the 2019 SLEITI report. The Report also includes all DACDF transfers from NMA to the MMMR and disbursement from MMMR to local communities. Please see page 57 of the 2019 SLEITI report which can be found here.
Social expenditures (#6.1) In accordance with Requirement 6.1, Sierra Leone should ensure mandatory social expenditures, such as expenditures under Community Development Agreements, are	Yes, fully addressed. Mining companies selected in the scope of the 2019 SLEITI report, reported mandatory and social expenditure under the Community Development Agreements.

 comprehensively disclosed each reporting year. For all material mandatory social expenditures, companies are required to disclose the nature and value of transactions, whether in cash or in kind, and ensure that disclosures be disaggregated by non-government beneficiary with information on the names and functions of third-party beneficiaries. Sierra Leone is encouraged to reconcile mandatory social expenditures and consider disclosing information on companies' voluntary social expenditures. Public debate (#7.1) Public debate (#7.1) Public debate Sierra Leone should ensure timely dissemination of EITI data and findings as well as effective outreach to key stakeholders. Implement the Open Data policy; To strengthen implementation, Sierra Leone may wish to ensure that realistic work plan activities related to dissemination and outreach are duly implemented. Sierra Leone is encouraged to explore creative ways to disseminate EITI data to strengthen the EITI's contribution to public debate. 	Yes, fully addressed. 2017-2018 report was disseminated nationwide. The dissemination report can be accessed here- 2017-2018 Dissemination Report. The 2021 work plan activities related to dissemination and outreach were fully implemented. The MSG developed: a) Advertorial, b) Jingles in 5 local languages, c) Billboards installed nationwide, d) T-Shirts, brochure, e) Summary reports, f) Mouse pads, SLEITI TV Hour Show on SLBC. The television show is available here. An Open Data Policy has been developed and approved by SLEITI. The policy can be accessed here: <u>SLEITI MSG Open Data Policy</u> Implementation is in progress
2017/2018 Report Recommendations	Status / Progress
Considering that the MCAS or online mining register does not feature essential requirements such as License terminations and transfer, it is recommended that these are uploaded onto the MCAS system for easier accessibility.	Yes, partially addressed. The MCAS specifies whether a license is active, suspended, or cancelled/terminated. Regarding transfer of license, this is not yet implemented. The National Minerals Agency is currently reviewing the modules on the MCAS to include transferred licences in order to address this recommendation.
There should be uniform rates or threshold rates for certain categories of mining contracts and activities. This will ensure standardization and foster transparency.	Not yet addressed. The MSG noted that there are challenges in getting a uniform threshold rates for surface rent due to geographical locations, local bye-laws and other factors. The MSG will continue to work with the relevant authorities to see how standardization can be achieved.

Companies or NMA should provide details of payments made by mining companies to Communities (stating which chiefdoms and Paramount chiefs and the amounts paid) within their operational area to afford easy reconciliation.	Yes, fully addressed. This recommendation has been addressed in the 2019 report. Please see pages 89 to 93 of the report <u>here</u> .
Documentation on exporters' license and agencies are not available for levying tax chargeable. The base data on such payments must be known to the MSG to enable them maintain database of ASM activities for future EITI reporting.	Yes. Partially met. The MSG noted challenges in regulating the ASM sector and worked with Government and stakeholder to ensure that, there is provision in the new Mines and Minerals Development Bill to formalise this sector. This will enable the NMA to get accurate data on the ASM activities and enhance regulation of the sector.
The PD must maintain an online register albeit currently few Licences, this is in compliance with EITI requirements and fosters transparency.	Yes, partially addressed. The Petroleum Directorate maintains a physical Register of Licences in accordance with the provisions of the Petroleum Act. However, efforts are under way to have an online register as required by the EITI Standard.
MSG is encouraged to facilitate the review of these legal documents which seek to legitimize all company payments to central agency prior to disbursement.	Yes, fully addressed. The Public Financial Management Act 2016 has made provision for all extractive revenues to be put into a special account called Transformational Development Fund Account. Please see Part VI, section 77-82 of the Public Financial Management Act 2016 here: <u>Public Financial Management Act</u> 2016.
2019 Report Recommendations	Status/Progress
The SLEITI MSG should document its discussion on what constitutes government policy on contract Disclosures by identifying ongoing reforms or new measures under discussion that could strengthen the availability of contract information. The SLEITI MSG should then address any obstacles and Challenges in adopting full contract transparency as required by the EITI Standard (Requirement 2.4). Finally, the SLEITI MSG should develop a roadmap for strengthening the disclosures of extractive contracts, Which include actions, responsible parties, timelines, resource and technical assistance needs?	This is on-going. The MSG has commenced engagement with NMA and MMMR to develop policy on contract disclosure. This is also reflected in the 2022 work plan activities. As best practice, all contracts are currently disclosed through the Government of Sierra Leone Online Repository and Resourcecontract.org portal even though there is no mandatory policy or law.

In order to comply with Requirement 2.3 (b) of	This is on-going.
 the 2019 EITI Standard, the Government of Sierra Leone should implement a publicly available register for oil & gas licenses including the following information: license holder(s); coordinates of the licensed area; dates of application, dates of award and duration of the licenses; and In the case of production licenses, the Commodity being produced. 	The Petroleum Directorate maintains a hard copy version of the Register with this information which is publicly available consistent with the provision of the Petroleum Act. Efforts are underway to make the register available on line in compliance with Requirement 2.3 (b) of the 2019 EITI Standard.
In order to comply with requirement 6.3 of	Partially addressed.
 EITI Standard 2019, we recommend to the government agencies to disclose contribution of the extractive Sector to the economy on annual basis. It is required that this information includes: the size of the extractive industries in absolute terms and as a percentage of gross domestic product as well as an estimate of informal sector activity, including, but not necessarily limited to, artisanal and small scale mining; total government revenues generated by the extractive industries (including taxes, royalties, bonuses, fees, and other payments) in absolute terms and as a percentage of total government revenues; Exports from the extractive industries in absolute terms and as a percentage of total exports; and Employment in the extractive industries in absolute terms and as a percentage of the total employment. The information should be disaggregated by gender and, when available, further disaggregated by company and 	The MSG acknowledges that the information is available in the Ministry of Finance Annual Budget Speech, and can also be accessed on request from the relevant ministries and agencies. However, the MSG will continue to work with the relevant authorities to ensure that the information is routinely disclosed online by the various agencies.
occupational level. We recommend that the reporting entities	This is on-going
comply with the deadlines set by the SLEITI MSG. Also, emphasis should be laid on the importance of collaboration of reporting entities towards the IA following the submission of Reporting Templates. We recommend to the SLEITI MSG to seek financial support to the SLEITI Secretariat from government or international funding	During the previous reporting period, several reporting entities met the deadlines set by the MSG. The MSG has agreed to formally inform defaulting entities to adhere to future reporting deadlines. Partially addressed/On-going. The MSG has requested a total of USD 480,000
institution in order to: - promote EITI values in Sierra Leone; - perform awareness workshops to improve the involvement of SLEITI Stakeholders in the EITI reporting process; and	from the Government of Sierra Leone to implement the 2022 work plan. The MSG has agreed to also reach out to World Bank, Africa Development Bank, Africa Centre for Energy Policy, GIZ, UNDP and others to support SLEITI implementation.

- Capacity	building	of	government	agencies
'and extrac	tive comp	ban	ies' EITI focal	points.

(add rows as necessary)

6. How have lessons learned from EITI implementation informed the current work plan?

Lessons learned from EITI Implementation have informed the current work plan in the following ways:

- EITI Requirements are constantly evolving and the MSG has incorporated the new issues of Gender, Environment, Beneficial Ownership Disclosure, and mainstreaming into the current work plan. Furthermore, the work plan included activities for the implementation of corrective actions recommended by previous validations.
- The MSG has also noted that there were other areas in the natural resources and extractive sector such as quarry, marine resources, forestry that need to be incorporated into the scope of SLEITI.
- In view of the evolving needs and anticipated increase in the scope of responsibilities of the MSG, a functional review of the National Secretariat staff capacity was undertaken to ensure the provision of adequate support by the Secretariat to the MSG.

Innovations and impact

7. Summaries any steps taken by the MSG to exceed EITI Requirements in a way that addresses national or local extractive sector governance priorities.

To enhance Beneficial Ownership Disclosure, the MSG has included financial and integrity institutions which were hitherto not part of the SLEITI process. As such, the Financial Intelligence Unit (FIU), Anti-Corruption Commission, and Bank of Sierra Leone were co-opted into the Beneficial Ownership Technical Working Group.

The MSG contributed to the development of the new Mines and Minerals Development Act by participating in almost all the consultations held to ensure that it reflected SLEITI implementation. The Act makes provision for BO disclosure and the regulation and governance of the quarry sector which is intended to come under the scope of SLEITI shortly.

The MSG approved the production of the 2019 SLEITI report in braille. This will enhance accessibility of EITI data to persons with disability.

To sustain and strengthen EITI implementation in Sierra Leone, the MSG has agreed to develop a SLEITI Bill to give statutory provisions for EITI Implementation in Sierra Leone. The Bill has been forwarded to the EITI International Secretariat for review. The MSG has created a WhatsApp group where EITI information is disseminated. The "**Support EITI-SL**" is open to all individuals interested in the EITI process. It also serves as a platform to debate natural resource governance.

The "**MSG WhatsApp Group**" is created exclusively for the purposes of sharing information to the MSG about the EITI process, meeting schedules, activities, and more. These WhatsApp groups have been very effective as a means of information dissemination during the Covid-19 period.

The EITI process in Sierra Leone is contributing to addressing negative social and economic impact in mining communities and builds peace and social cohesion. SLEITI participated in the development and supported the implementation of the United Nations Peace building Fund/UNDP Project "Mitigating Localized Resource-based Conflicts and Increasing Community Resilience in Pujehun and Moyamba Districts in Sierra Leone". The Project aims to mitigate local resource based conflicts between communities, government and private companies by building capacities and inclusive institutions and dialogue platforms. Project activities included support to SLEITI capacity building (workshops, south/south study tour to Senegal), Land Degradation Study in Mining lease areas, training on business and human rights, support to women groups and training on SGBV, cultivation of inland valley swamps to provide alternate livelihoods in mining communities. The Project ends on 31st March, 2022. The project document can be seen here: WFP & UNDP Peace Building Fund Project Document and the impact story by Aljazeera on the project can be accessed <u>here</u>.

8. What kind of outcomes and impact have these measures resulted during the period under review?

[Explain how the MSG tracks outputs, outcomes and impact and include link(s) to any relevant documents. Summaries the outcomes and impact of efforts to ensure that EITI implementation addresses national or local extractive sector priorities. If the MSG has documented this elsewhere, please provide a link to relevant documents. Outcomes and impact can be disaggregated by constituency or beneficiary group, if relevant.]

Beneficial Ownership Disclosure: In the 2019 reporting period 6 out of 11 in-scope mining companies provided data on beneficial ownership. This has enhanced transparency and accountability and reduced the risk of corruption, money laundry and terrorism financing. See pages 71-74 of the 2019 SLEITI report for details of BO reporting. The BO report can also be accessed here -<u>BO Report</u>

The nationwide dissemination of the SLEITI reports has empowered Civil Society to demand accountability from the Government about their stewardship of the extractive sector. Industries have also used the platforms to disclose their mandatory and voluntary payments to governments and communities. This has fostered transparency and social cohesion in mining communities.

The dissemination process has also created a platform for debate resulting in strategic reforms in the sector. The new provision on surface rent payment in the Mines and Minerals Development Act came as a result of concerns raised by community stakeholders for Government to review provisions in the 2009 Mines and Minerals Act.

Linking effective implementation of SLEITI and enhanced transparency and accountability of natural resource revenues to peace building, conflict prevention and social cohesion through the UNPBF/UNDP Project has broadened the scope of SLEITI and fostered collaboration with other international benchmarks such as the UN Guiding Principles on Business and Human Rights.

A SLEITI Law which is being proposed would mandate all stakeholders to comply with EITI reporting requirements and deadlines. This will enhance transparency and accountability and deepen the impact of EITI implementation.

8. If the MSG has plans to include new issues or approaches to EITI implementation, please describe these.

The MSG plans to include other sectors in the scope such as quarry, Marine, and Forestry.

The MSG will leverage the political will of both the Presidency and Parliament to ensure the passage of the SLEITI Bill in order to give legal status to EITI implementation.

To ensure proper utilization of natural resource revenues for socio-economic development, the MSG has the desire to continue looking just beyond reconciling natural resource revenues but also to monitor outcomes and impact of EITI implementation and the socio-economic benefits of natural resources exploitation to communities.

The MSG intends to produce EITI impact and data stories to explain the contribution of the sector to the economy and how prudent utilization of revenues will address basic social amenities.

The MSG will continue to foster collaboration with international programs and processes on the environment, human rights, conflict prevention, peace building and social cohesion at the local level to strengthen SLEITI Implementation

9. What kind of outcomes and impact are these plans expected to result in?

By including other sectors into the scope of SLEITI reporting, will enhance transparency and accountability in those sectors. This will also help address environmental impact of deforestation, climate change, and improve institutional collaboration for effective revenue collection and increased mobilization of resources for development.

Enacting of the SLEITI Law would ensure sustainability of EITI implementation in Sierra Leone and institutionalization of EITI implementation within government and industry.

Proper utilization of natural resource revenues would lead to poverty reduction and improve social service, human capital development, infrastructure which are priority areas in the Government Medium Term National Development Plan.

The impact stories will showcase the importance of EITI implementation and its contribution to transparency and accountability in the extractive sector.

10. Summaries the MSG's efforts to strengthen the impact of EITI implementation in the period under review, including any actions to extend the detail and scope of EITI reporting or to increase engagement with stakeholders. The MSG is encouraged to document how it has taken gender considerations and inclusiveness into account.

In the period under review, the MSG kept the momentum of EITI implementation in Sierra Leone, and developed several approaches which further enhanced the impact of implementation:

- a) **Report timeliness** The MSG simultaneously published the 2017 and 2018 report in December, 2019. The objective was to make EITI data timely and relevant. The MSG has approved the production of the 2020 and 2021 reports using the flexible reporting model to improve on the timeliness of EITI data.
- b) **Strengthening implementation** The MSG worked closely with the National Minerals Agency (NMA) and the Ministry of Mines and Mineral Resources in the consultations leading up to the development of the three Minerals Policies, the Mines and Minerals Development Bill, and the new NMA Act. This will ensure effective management of the sector.
- c) The provision of Beneficial Ownership in the Mines and Minerals Development Bill will strengthen disclosure and help fight against corruption, terrorist financing, money laundering, tax evasion.
- d) **SLEITI Bill** Due to the evolving nature of the EITI Standard, the MSG drafted a SLEITI Bill which is currently being reviewed by stakeholders and the EITI Secretariat. This will enhance and sustain the SLEITI process, and strengthen engagement with stakeholders.
- e) Social Cohesion : The approach adopted by the United Nations Peace Building Fund to use EITI Data to develop and implement the Project "Mitigating Localized Resourcebased Conflicts and Increasing Community Resilience in Pujehun and Moyamba Districts in Sierra Leone" and linking SLEITI Implementation with other benchmarks on human rights peace building, social cohesion and women's empowerment has enhanced the scope of SLEITI, and its relevance in the overall development, peace and stability of the Country.
- f) SLEITI Studies: In the period under review, the MSG published three studies designed to promote mainstreaming, sustain SLEITI implementation, and engagement with stakeholders. The studies are:
 - a) Beneficial Ownership Transparency in Sierra Leone-Report on BO Study

- b) Feasibility Study for Mainstreaming EITI Reporting-Study Report
- c) The Impact of EITI and Socio-economic Benefits Derived from Subnational Extractive Revenues by Mining Companies- <u>Study Report</u>
- g) **Report Dissemination**: The 2017-2018 SLEITI report was disseminated nationwide to deepen understanding of the sector, generate debates for reforms, and inclusive decision making. This has empowered citizens to demand accountability from industry and government.
- h) **Gender empowerment** In recognition of the new gender requirement in the 2019 EITI Standard and the Government priority on gender empowerment, the MSG increased its female representation from five to nine. This has significantly strengthened female participation on the MSG. Also, the MSG Chair is a female and she sits on the EITI International Board.

Part II: Public debate

Open data (Requirement 7.2)

11. Open data policy and disclosures

Provide a link to the open data policy agreed by the MSG (Requirement 7.2.a)	[Add link(s) to relevant open data policy (ies) and any commentary.]
	The SLEITI Open Data Policy is available here: <u>SLEITI Open Data Policy</u> . The policy adopts a set of principles to guide the release of existing and new datasets under EITI and thus provide a foundation for the access, use and re-use of data.
Is EITI data available in open data format and publicized? (Requirement 7.2.b)	[EITI data refers to disclosures within the scope of the EITI Standard, including the tables, charts and figures from EITI reports.] Yes.
	The word version of the 2019 SLEITI Report contains tables, charts, and figures which can be re-used. The report is available <u>here</u> .
	The Sierra Leone Online Repository contains

	data on all issued mineral rights; exploration, mining, dealers and exporters licenses issued, as well as related payments. Sierra Leone is a member of the resourcecontract.org . This platform provides summaries of contracts and their terms to facilitate understanding of important provisions in the documents. The site is available <u>here</u> .
Has the MSG identified gaps in the availability of EITI data in open format? If yes, what kind of gaps? (Requirement 7.2.b)	Yes. Some of the data published by relevant stakeholders are in PDF and other format that make it difficult to be reused. However, SLEITI reports are published in an open data format.
Has the MSG undertaken efforts to improve the availability of data in open format? If yes, please describe these. (Requirement 7.2.b)	Yes. The SLEITI MSG Open Data Policy is geared towards encouraging reporting entities to publish their data in open data format. This will ensure that all EITI data are published in CSV, excel, and word format which contains table, charts, and figures in accordance with the 2019 EITI Standard.
Have summary data files been completed for each fiscal year for which data has been disclosed? (Requirement 7.2.c)	Yes. The MSG has published its reporting summary data files for the period covering 2017-2019 which can be accessed below: <u>2019 Preliminary Summary Data File</u> <u>2018 Preliminary Summary Data File</u> <u>2017 Preliminary Summary Data File</u>
What systematically disclosed data that is in the scope of EITI disclosures is machine readable and inter-operable? (Requirement 7.2.d)	-The Sierra Leone online repository contains details on license and contract which are machine readable format as well as the SLEITI Summary data files.

Outreach and communications (Requirement 7.1)

12. Describe the MSG's efforts in the period under review to ensure that information published about the extractive sector is comprehensible and available in appropriate languages.

The <u>SLEITI Reports</u> were produced in accordance with EITI Standard. These reports were written in simple English, and can be easily understood. The reports were widely disseminated using several approaches including town hall and community meetings and community radio programmes in local languages.

The summary data templates also contain comprehensive information on the extractive sector and can be accessed here: <u>Preliminary Summary Data Template</u>

SLEITI activities were widely reported in local newspapers, and through television and radio stations.

The SLEITI MSG advertorial is also an important tool in communicating implementation of the SLEITI process to the public. This can be accessed here - <u>SLEITI TV SPOT</u>

The MSG also erected billboards with information about the SLEITI process in strategic locations across cities and provincial headquarter towns. One of the billboards can be accessed in the gallery section on the SLEITI website here - <u>SLEITI Billboard</u>

13. Describe examples of use of EITI data.

- a) Research work by Samantha Da Luz from the Leiden University-Netherlands. The work reference the SLEITI MSG process. Page 108 of the study is explicit on this and is available <u>here</u>
- b) The SLEITI Summary Report was developed to ensure easy use of EITI data.
- c) Local tabloids have run stories on SLEITI, many of which referenced SLEITI reports, processes and procedures of implementation, and of EITI impact.
- d) SLEITI has also used EITI report to disseminate information about the extractive sector in different languages at community level.

14. Provide information about outreach events organized to spread awareness of and facilitate dialogue about governance of extractive resources, building on EITI disclosures.

The activities listed below are selected from MSG programmes implemented between 2018-2022

Event name	Brief description of the event	Date	Location	Organizer	Number and type of attendees	Links to further informatio n
Workshop to Validate EITI Board's Templates	The MSG and other stakeholders met to review and further update the 3 Validation templates	17 th March 2022	Freetown	SLEITI MSG	35 MSG Members, Media and other stakeholde rs	<u>Workshop</u> <u>Report</u>
2 -day MSG Pre- Validation Workshop	The MSG received support from the EITI Secretariat on the new Validation procedures and templates	1 st & 2 nd February 2022	Bo City	SLEITI MSG	50 MSG members, EITI Secretariat , African Center for Energy Policy, and Media	<u>Workshop</u> <u>News</u> <u>Workshop</u> <u>Report</u>
2-day Workshop on Strengthe ning EITI Process	CSOs in collaboration with ACEP to build the capacity of CSOs, Journalists, and MDA's on governance of the extractive sector	2 nd -4 th November 2021	Freetown	NACE, ACEP, and Budget Advocacy Network (BAN)	Governme nt, CSOs, Media and ACEP	<u>Workshop</u> <u>Report</u>
2-day residentia I mining conferenc e	The mining conference was to promote transparency and accountability in the extractive sector for nation	9-10 December 2021	Makeni	Women on Mining & Extractives , Oxfam and SLEITI	Governme nt MDAs, CSOs, and Media	<u>Workshop</u> <u>Report</u>

	building					
SLEITI TV Hour	The MSG implemented six TV programmes on SLBC- One hour each, over a period of six months to spread awareness about the EITI process & the extractive sector	April- September 2021	Freetown	SLEITI MSG	Nationwide	<u>SLEITI TV</u> <u>Hour</u>
SLEITI Peer Learning Mission to Senegal	This activity was undertaken to assess Senegal EITI implementation process to enhance SLEITI implementation	17-24 November 2021	Senegal	UNDP/UNPBF; MSG and SLEITI Secretariat	Delegation members - 2 from MSG and 2 from SLEITI Secretariat	<u>Mission</u> <u>Report</u>
Nationwid e dissemina tion of 2017- 2018 SLEITI report		7 th – 24 th September 2020	Nationwi de	MSG	Citizens in affected communiti es, general public and Media	<u>Dissemina</u> tion Report
MSG Work plan Retreat	The Work plan retreat was geared towards strengthening EITI implementation and to map out strategies to address the 2018 Validation corrective	5 th & 6 th March 2020	Kenema	MSG	30	<u>Workshop</u> <u>Report</u>

	actions					
Stakehold er consultati on on EITI Strategic themes	A one-day stakeholder consultative workshop was held to discuss EITI's role in addressing corruption, EITI's contribution in the global discussions on energy transition; its impact, and reviewing the previous validation mode	4 th February 2020	Freetown	MSG	35 MSG members, CSOs outside the MSG, Media, other MDAs outside the MSG	<u>News</u> <u>Report</u>

15. Describe the MSG efforts in the period under review to consider access challenges and information needs of data users, including different genders and subgroups of citizens.

Due to the Covid-19 pandemic and restrictions on gathering , the MSG used the "online no objection" provision on its MoU to approve several documents including:

- a) Minutes of meetings,
- b) ToR for the production of the 2019 Flexible report
- c) Braille version of 2019 SLEITI Report
- d) ToR for the Study on Beneficial Ownership in Sierra Leone
- e) ToR for Feasibility study for mainstreaming EITI reporting
- f) ToR for a study on the impact of EITI and Socioeconomic Benefits Derived from Subnational Extractive Revenues by Mining companies

A cross section of MSG members paid a courtesy call on the Minister of Mines and Mineral Resources to request the draft Mines and Minerals Development Bill. The objective was to review the Bill to ensure that the MSG's insertions for transparency and accountability, including the provisions for BO disclosure were adequately incorporated.

The MSG also addressed a letter to the Attorney General and Minister of Justice to seek legal opinion on the enforcement and implementation of the Sierra Leone National Carrier

Agreement Ratification Act No.13 of 2012.

The MSG effectively utilized its WhatsApp group to communicate and to interface with the national Secretariat. In addition, the MSG used "Support EITI-SL" WhatsApp group as one of its main channels of information dissemination especially during the peak of the covid -19 pandemic.

16. Describe other efforts by the MSG in the period under review to ensure that information is widely accessible and distributed.

[Document whether the MSG has

- produced summary reports, thematic reports or other analysis that is accessible, concise and easily understood by target audiences;
- Summarized and compared the share of each revenue stream to the total amount of revenue that accrues to each respective level of government.
- Undertake capacity-building efforts, especially with civil society and through civil society organizations, to improve understanding of the information and data from the reports and online disclosures and encourage use of the information by citizens, the media and others.

Provide links to supporting evidence.]

The SLEITI <u>2019 Summary Report</u> is available online. The summary report is easily understood by all stakeholders and high school students. To ensure that information is widely accessible and distributed, the MSG undertook a nationwide dissemination of the reports through several approaches including the following:

- Town hall meetings which created opportunities for stakeholders to keep abreast with the EITI Process. Of importance to the communities and stakeholders, was the management of surface rent payment, the Community Development Fund payment, and their impact on specific communities. The dissemination report is available here-<u>Dissemination Report</u>
- The MSG held special radio programmes with Community radio stations during the report dissemination. This was adopted to share information with stakeholders in farto-reach mining communities. The radio talking points focused on the EITI implementation in Sierra Leone, the report findings and recommendations, and the governance of the sector. Overall, the radio programmes were designed to provide detail, but concise explanations about the governance of the sector.
- Jingles were developed in five (5) popular local languages and aired on community radio stations nationwide to create awareness about the SLEITI process. The jingles were developed in Temne, Kono, Mende, Krio, and English.
- Several newspapers ran stories on the 2018 report production. The newspaper reports were informative, factual, and covered the findings and recommendations of the

report including other contextual information.

17. How could the MSG improve the accessibility and distribution of information, considering the needs of different subgroups of citizens?

- Sustain the production of the Braille report and explore the possibility of producing other forms of the report such as an audio version to ensure access to SLEITI information for more persons with disability.
- Build the capacity of journalists and CSOs to use SLEITI report to analyze and produce additional information about the governance of the extractive sector.
- Maintain cordial relationship with CSOs, and media to build synergy when disseminating the SLEITI report
- Summary versions of EITI report to be produced in audio format in local languages.

Part III: Sustainability and effectiveness

18. The MSG is requested to present any additional information and evidence related to the indicators for assessing the sustainability and effectiveness of EITI implementation.

Each indicator will be assigned 0, 0.5 or 1 point by the EITI Board. The points will be added to the overall score of the country. The assessment of performance on the indicators will draw on information provided by the MSG, publicly available sources, stakeholder consultations and disclosures by the implementing country and companies. Please see the EITI Validation Guide for further information about how performance on these indicators will be assessed.

I. EITI implementation addresses nationally relevant extractive sector governance challenges. This indicator also recognizes efforts beyond the EITI Standard.

[Add MSG response and additional information/evidence.]

- The MSG was actively involved in the consultations leading up to the development of the three (3) Minerals Policy of 2018, and the stakeholder engagement on the development of the Mines and Minerals Development Act. Also, the MSG helped strengthen the definition of Beneficial Ownership in the Act to align it with the EITI Requirement. The Minerals Policy and the Mines and Development Bill will address the numerous challenges associated with the governance of the sector especially those identified through EITI Implementation over the years.

The Medium Term National Development <u>Plan</u> seeks to mainstream transparency and accountability practices into the extractive sector in accordance with the EITI Standard.

Against this backdrop, the MSG has published a feasibility study report on mainstreaming EITI reporting in Sierra Leone. This will provide an indication of the quality of data with respect to its comprehensiveness, disaggregation, and timeliness and recommendations for its implementation.

II. Extractive sector data is disclosed systematically through routine government and corporate reporting.

[Add MSG response and additional information/evidence]

Yes. The Online Repository contains data on all issued mineral rights, exploration, mining, dealers and exporters licenses, as well as related payments. These are systematically disclosed.

The National Revenue Authority installed the Non-Tax Revenue System (NTRS) which is linked with MCAS to allow processing of Orders to Pay from the National Minerals Agency. The MSG will continue to work with these agencies to ensure that Non-Tax Revenue is easily available and accessible.

III. There is an enabling environment for citizen participation in extractive sector governance, including participation by affected communities.

[Add MSG response and additional information/evidence.]

Yes, there is an enabling environment for citizens to participate and demand accountability in the extractive sector.

His Excellency President Dr. Julius Maada Bio signed the amended law, effectively repealing the 55-year-old seditious libel section of the Public Order Act 1965 that criminalized free speech and stifled journalism in Sierra Leone. Please see here: <u>Repeal of Criminal Libel Law</u>

The Government during this period has strengthened the capacity of the Right to Access Information Secretariat to improve its effectiveness. The link to the Act can be found here Right to Access Information Act 2013 and Here

Government established the Civil Society (CSO) Dialogue Series in October 2020 as a platform for regular dialogue with CSOs on governance and development issues. Please see link here: <u>Government and CSO Dialogue Series</u>

The Government held consultations with citizens in partnership with CSOs and mining companies on the review of the Mines and Minerals Act 2009. Please see link here: <u>CSOs</u> <u>Present Recommendations on the Review of Mines Act 2009</u>

Gender Equality and Women's Empowerment Act aims at mainstreaming gender into all

development and political processes in Sierra Leone to ensure livelihood and social protection for women, men, boys and girls for sustainable peace and economic growth. Please see the Act here: <u>Gender Empowerment Act 2021</u> and news coverage here: <u>Gender Empowerment Act 2021</u>

IV. Extractive sector data is accessible and used for analysis, research and advocacy.

[Add MSG response and additional information/evidence]

Yes, CSOs have previously used SLEITI data to produce thematic report for lobby and advocacy, including cascading such data to other Community Based Organizations in mining communities.

V. EITI has informed changes in extractive sector policies or practices.

[Add MSG response and additional information/evidence]

Yes.

- 1) The inclusion of Beneficial Ownership information in the National Corporate Governance Code was done to strengthen implementation of BO Requirement. The Code can be accessed here - <u>Corporate Governance Code</u>.
- 2) The development of the Mines and Minerals Development Act was to strengthen the governance of the extractive sector. The inclusion of BO provisions in the Act was to ensure that BO disclosure becomes mandatory.
- 3) To strengthen accountability in subnational transfer, the Ministry of Mines and Minerals Resources has adopted a new practice where beneficiary communities submit development proposals in line with Government priorities before disbursement.

Part IV: Stakeholder feedback and MSG approval

19. Describe opportunities provided to stakeholders beyond MSG members to give feedback on the EITI process, including the EITI work plan.

a) The dissemination of the 2017-2018 report to communities provided opportunity for

stakeholders beyond the MSG to give feedback on EITI implementation. Often held in town halls, the targeted audience included youth groups, members of parliament, Chiefs, CSOs, company and government representatives, women organizations, students, media and other groups.

b) The SLEITI TV Hour and Radio programmes provided important platform to generate feedback from stakeholders outside the MSG about the EITI process and the extractive sector by providing time for phone-in questions/comments.

c) Engagement with stakeholders and donor partners (OSIWA, WB, GIZ, and UNDP) is an important means for receiving feedback about SLEITI process. Also, the MSG has shared the 2022 work plan with development partners and other stakeholders for feedback.

d) Press conferences have also been held by the MSG to generate feedback from stakeholders beyond the MSG.

20. Describe how any feedback from stakeholders beyond MSG members have been considered in the review of the outcomes and impact of EITI implementation.

Through the SLEITI nationwide dissemination, the Government has responded to concerns over the distribution of surface rent payment which is currently split into five portions with landowners receiving only 50%. The new proposed provision on surface rent in the Mines and Minerals Development Act will allocate 70% to land owning families, and 30% to chiefdom administration.

The definition of "Project" in the EIRA 2018 was also developed to fulfill the EITI requirement under project level reporting. Sections 5 of the EIR Act is available <u>here</u>

21. Date of MSG approval of this submission and information on how the public can access it, e.g. link to national EITI website.

24th March 2022 (MSG meeting) and 28th March 2022 (through No-objection approval)

The public can access the submission on the SLEITI website which is available here - <u>Validation</u> <u>Supporting Documents</u>.