



Extractive Industries Transparency Initiative  
The Netherlands

# **Work plan NL-EITI 2022**

version 31 March 2022

## 1. Introduction

The Dutch government has been actively involved in EITI since its inception in 2002. EITI stands for *Extractive Industries Transparency Initiative*; transparency initiative mineral extraction. In 2018, the Netherlands also became a member of this global initiative, whose membership exceeds 50 countries by early 2022.

## 2. Objective and priorities

### *Objective*

The objective of the Netherlands' implementation of the EITI standard is formulated as follows:

*"The objective of the NL-EITI is to make factual information on mineral extraction in the Netherlands and its revenues accessible to the mineral industry and the Dutch government. The NL-EITI thereby aims to contribute to the social debate on the significance of the minerals industry for Dutch society."*

This objective was formulated by the MSG at the end of 2017 and amended in March 2021, to put more emphasis on input to the public debate and the visibility of NL-EITI.

- On the one hand, the objective concerns the disclosure of information on all links in the value chain, from licensing to revenue.
- On the other hand, it concerns the contribution to social discussion. This involves topics related to the minerals industry, such as energy transition or quakes resulting from gas extraction.

### *Validation 2021*

In 2021, the implementation of EITI in the Netherlands was validated for the first time by the international EITI Board (decision 2021-72/BC-316, 8 December 2021). In this, NL-EITI scored 56 out of 100 points to be achieved overall. This score is an average of three scores: result & impact (48 out of 100), stakeholder engagement (53 out of 100) and transparency (68 out of 100).

- The international EITI board compliments the realisation of a platform for multi-stakeholder dialogue and the systematic disclosure of data on production, exports and licences of the minerals industry. This is recognised by the MSG: these data-as required in line with EITI standards-are generally accessible in the Netherlands and reconciliation shows that financial flows reported by companies do not deviate from government-reported revenues.

- NL-EITI still scores low on results & impact. The international EITI board encourages NL-EITI to put topics on the agenda for public debate, this will also have a positive impact on stakeholder engagement.  
The MSG recognises that there has hardly been any contribution to the public debate yet, although the new website is a good first step. The focus in the first few years, also given limited capacity, was on the reconciliation of financial flows.
- NL-EITI also scores relatively low on transparency. The international EITI board sees a gap between the systematic disclosure of data by NL-EITI and the desire for data disclosure in other areas such as cooperation agreements between Energie Beheer Nederland and licensees, environmental impacts and payments to decentralised authorities. The MSG does not recognise this and believes that the EITI standard is met in most respects in this respect. Where necessary, this will be made explicit on the website and in upcoming reports.

### *Priorities*

This year, the target and the outcomes of the December 2021 validation report have been translated into the following priorities:

#### **A. Results & Impact**

##### *1. Increase visibility of NL-EITI*

In which more attention will be generated for the website. Furthermore, how to increase the involvement of MSG members' constituencies. In addition, exploring and analysing where a contribution can be made to the public debate.

#### **B. Stakeholder engagement**

##### *1. Continuity and composition of multi-stakeholder group*

Reflecting on continuity in view of the next validation in 2024. In addition, reflecting on composition; as the focus shifts from financial data to policy and communication.

#### **C. Transparency**

##### *1. Reconciliation*

Focus on recommendations from the validation, such as publication of ultimate stakeholders (the UBO register) and reporting on companies' payments to governments.

##### *2. Systematic disclosure of data*

Explore with the mineral sector companies, the Ministry of Economic Affairs and TNO whether the financial data requested by EITI could not be made public by the parties themselves, thus reducing the burden on both companies and government and perhaps making an annual reconciliation unnecessary.

##### *3. Clarifying EBN's position and modus operandi*

The validation again shows that we have not yet sufficiently succeeded in clearly describing the role of state-owned EBN. The ambition should be to remove the existing doubts, especially about the relationship between EBN and the licence holders and about EBN's proceeds from sales.

4. *Explicit where the EITI standard is met*

The validation report makes it clear that the MSG's previous reports apparently do not sufficiently show where the EITI standard has been implemented.

### 3. Activities

#### General

- Five meetings are scheduled for the MSG in 2022 February (week number 7), April (week number 14), July (week number 27), September (week number 38) and November (week number 45).
- In addition, a meeting will be organised with the international EITI secretariat in the second half of May (week number 21).
- Where necessary, subgroups will prepare for discussion and decision-making in the MSG.

#### Specific by priority

##### *Priority A1: Increase visibility of NL-EITI*

The plan of action is aimed at increasing the visibility of NL-EITI, through website, engaging constituencies and contributing to the public debate by:

- generate more attention for the NL-EITI website, by making it more visual, interactive, attractive and accessible in terms of content. In addition, by generating more attention for the website, for instance in search engines, on social media or through other activities. Furthermore, insight is provided into where on the website each EITI requirement is met;
- explore with the sections how best to shape constituency involvement. This could be done, for example, by a presentation from the secretariat or by using MSG members as ambassadors.
- Conduct a network and/or environment analysis to clarify where NL-EITI can contribute to the public debate. Where necessary, supplemented by a media analysis. Topics mentioned at the Heath Day in March 2022 with high societal relevance and high relevance from the EITI standard: CO2 storage linked to CO2 price, financial side compensation for earthquake damage and money flow from government to mineral industry. Also mentioned was making the role of natural gas (infrastructure) and oil and gas companies in the energy transition transparent in the government's agreements on this.

The implementation of this is invested by the MSG in the Communications subgroup. In addition to the chairman, coordinator and communications consultant, the current Communications subgroup consists of: Arendo Schreurs, Gerno Kwaks, Henk Korthof and Marieke van den Akker

#### **Decision point 6 April: consider whether communications subgroup will continue in current composition.**

In mid-May 2022, the action plan will be delivered and submitted to the MSG for approval.

The action plan will be reviewed in November. In 2022, especially in view of where the NL-EITI MSG can best contribute to the public debate, an exchange with the international EITI secretariat and with the national EITI secretariats of the UK and Germany will be invested in.

**Priority B1: Composition and modus operandi of multi-stakeholder group**

Discuss in MSG meeting in July 2022:

- Reflection on MSG working method: less financial and more policy-oriented and focused on communication. How does this affect the composition of the MSG?
- Reflection by MSG section and chairman on involvement (constituency) in NL- EITI and procedure for replacement MSG members, also with a view to desired continuity.
- Identify suggestions for more involvement of (constituency) MSG.

Based on this discussion, the secretariat will prepare a plan of action with the actions required and the timeframe for their realisation. This plan will be submitted to the MSG for approval at the MSG consultation in September 2022.

**Priority C1: Reconciliation**

- Determine preliminary scope and differences compared to previous reconciliation in MSG together with independent auditor in MSG meeting of April 2022. In doing so, the independent auditor is asked to specifically take care of improvement points 14, 17 and 19 of the validation report.
- The reconciliation will also consider whether the Netherlands meets the EITI requirement on disclosure of beneficial owners in the minerals industry through the UBO register for companies and other legal entities in the Netherlands (EITI Standard 2.5).
- The extent to which companies comply with the obligations arising from the Decree "Reporting payments to governments" will also be examined. This is part of the Dutch implementation of Directive 2013/34/EU of the European Parliament on annual accounts. The Decree provides rules on the obligation of companies from, among others, the minerals sector to prepare and disclose a report on payments they make to governments. This obligation aligns well with the EITI requirements on disclosure of payments made by oil and gas, and salt companies to governments (EITI standard 4.1, 4.7).
- Collection of signed permissions from exploration & production and salt companies by secretariat in February and March.
- Deliver scope report by BDO in March, for approval at MSG meeting April 2022.
- A reconciliation information meeting for mineral companies will be organised in early April (week number 15/16). This meeting will be organised by the secretariat, with the independent auditor providing the content presentation. New this time is the solicitation of final stakeholders.
- During April-May, the government and companies provide the required data to the independent auditor.

- This data will then be reconciled by the independent auditor during May to August and delivered 30 August in a report. This report will be submitted to the MSG for approval at the September 2022 meeting.

**Priority C2: Systematic disclosure of data**

- In the April MSG meeting, the Systematic Unlocking Data subgroup will be formed.
- It will identify opportunities for the systematic disclosure of data at source by companies and governments. It will examine what role companies, the government, but also, for instance, TNO with the Netherlands Oil and Gas Portal (NLOG) can play in this. For instance, governments and companies can make data public themselves as soon as they are available.
- Delivery of the options inventory and an estimate of lead time/feasibility to the MSG should possibly take place by the end of June 2022. In doing so, one or more options for follow-up will be identified by the subgroup.

**Decision point 6 April: compose subgroup Systematic unlocking of data**

**Priority C3: Clarify EBN's position and modus operandi**

- In the period April to June 2022, EBN and the Ministry of EZK, together with the secretariat, are preparing a document on the position and working method of Energie Beheer Nederland (EBN). This document will further clarify EBN's position and role, specifically for improvement points 11, 15, 19 and recommendations 3 and 4 from the validation report.
- The document will be submitted to the MSG for approval, after which it can be posted on the website.

**Priority C4: Explain where the EITI standard is met**

- In May, the secretariat will deliver an inventory of those areas of improvement and recommendations of the validation report, where it should be considered whether the requirements of the EITI standard are now (fully) met.
- This inventory will be submitted to the MSG for approval in July 2022.

## 4. Budget and funding

- The budget for the implementation of NL-EITI in the Netherlands is €0.45 million in 2022.
- NL-EITI is funded by the Ministry of Economic Affairs and Climate. The Secretariat of the NL-EITI is carried out by the Rijksdienst voor Ondernemend Nederland (RVO).
- The chairman of the MSG is granted a fixed monthly allowance, with the salary scale set at scale 18, of section 6.3 of the CLA Rijk and the working hours factor at 0.2.
- The costs of the three MSG constituencies' own staffing are at their own expense.

## 5. Milestones and planning

Date completed	Action item	Who	Relationship with Validation 2021
6 April 2022	Subgroup composition Communication and Systematic disclosure of data define	MSG	V1, V2, V3-V8, V9, V10-V23, S1-8
15 April 2022	Work plan 2022 ready	MSG/secretariat	V1
30 April 2022	Reconciliation: interrogation of payments and receipts and ultimate stakeholder about 2021	MSG/secretariat/ accountant	V11-23, specifically for accountant: V14, 17, 19
30 April 2022	Reconciliation: interrogation of payments and receipts and ultimate stakeholder about 2021	MSG/secretariat/ accountant	V11-23, specifically for accountant: V14, 17, 19
15 May 2022	Plan approach Visibility NL-EITI enlarge ready	Subgroup Communications	V1, V2, V9
30 June 2022	Plan for continuity, composition and method MSG ready	MSG/President	V1, V2, V4, V6- V9
30 June 2022	Completion inventory opportunities for systematic data retrieval	Subgroup Systematic data disclosure	V3-V8, V10- V23, S1-8
30 June 2022	Reporting position and working method EBN	EBN/EZK/secretariat	V11, V15, V19, S3, S4
30 June 2022	Deliver inventory of areas for improvement and recommendations from validation report, where further explanation is sufficient or to which currently already being met.	EBN/EZK/secretariat	V11, V15, V19, S3, S4
30 August 2022	Reconciliation over fiscal year 2021 is ready	Accountant	V11-V23
31 October 2022	Publication reconciliation 2021	Subgroup Communications	V11-23
31 October 2022	Reporting state of play implementation plan ready	Subgroup Communications	V1, V2, V9

MSG=Multi-stakeholder group

V=improvement point 1-23

S=strategic recommendation 1-8

Auditor=independent auditor Secretariat =

national secretariat NL-EITI

## Annex Detailed Planning Work Plan 2022



version:  
31 March 2022

Roll
C-coordinating
U-executive

Progress
is still open
in progress
runs
achieved

Secretariat = national  
NL-EITI secretariat

Target	Activity	Roles involved	Period	Progress	EITI-require d
<i>Filling in chairmanship and secretarial duties MSG</i>	complete presidency	President (U)	June, September		1.1b
	fill in secretariat	Secretariat (U)	continuous		
<i>Knowledge exchange with other secretariats</i>	exchange with international EITI secretariat, EITI UK and D-EITI	Secretariat (U)	continuous		
<i>NL-EITI work plan 2022</i>	drawing up work plan 2022	MSG (U/B), secretariat (C/U)	April		1.5, 7.3, 7.4
<i>Priority A1: Increase visibility of NL-EITI</i>	Assess whether communications subgroup continues in current composition	MSG sections (U), secretariat (C)	April		7.1, 7.3, 7.4
	Plan of action to increase NL-EITI visibility ready	Communications subgroup (C/U), MSG (B)	May		
	Implementing plan of action to increase NL-EITI visibility	communications subgroup (C/U)	May/June-October		
	Evaluation of implementation of action plan in MSG	MSG (U), subgroup Communication (C)	November		
<i>Priority B1: Composition and modus operandi of multi-stakeholder group</i>	Reflection on modus operandi and composition MSG	Squares MSG (U)	April		1.1-1.4, 7.3, 7.4
	Reflection on involvement (constituency) by section	Squares MSG (U)	April		
	Plan of action on continuity, composition and modus operandi MSG ready	MSG (B), chairman (U)	April-June		
	Implementation of action plan	MSG (U), secretariat (C)	July-November		



Target	Activity	Roles involved	Period	Progress	EITI-require d
<i>Priority C1: Reconciliation</i>	Determine preliminary scope and focus on improvement points 14, 17 and 19 from the validation	Secretariat (C), Accountant (U), MSG (B)	March-April		2-6,7.2-7.4
	Approach non-operators for their participation	Secretariat (U)	March-April		
	Collection of signed authorisations from oil and gas and salt companies	Secretariat (U)	April		
	Score report delivery	Accountant (U), Secretariat (C)	April		
	Information meeting for businesses	Secretariat (C), Accountant (U), Companies (industry) (U)	April		
	Companies and governments provide data	Industry (U), Government (U), Accountant (U), Secretariat (C)	April-May		
	Reconciliation provided data delivered in report	Accountant (U), MSG (B), Secretariat (C)	May-August		
<i>Priority C2: Systematic disclosure of data</i>	Composing subgroup Systematic disclosure of data	MSG sections (U), secretariat (C)	April		7.2-7.4
	Report identifying opportunities and feasibility of systematic disclosure of data at source + proposed follow-up	Subgroup Systematic disclosure data (U/C), MSG (B)	April-June		
<i>Priority C3: Clarify the position and modus operandi of Energy Management Netherlands</i>	Deliver report on position and working method, specific to improvement points 11,15,19 and recommendations 3 and 4 from the validation	EBN/EZK (U), secretariat (C), MSG (B)	April-June		2.6, 7.3, 7.4
<i>Priority C4: Explain where the EITI standard is met</i>	Deliver inventory response to validation report by improvement point/recommendation/EITI requirement where further explanation is sufficient or currently met.	MSG (B), secretariat (U/C)	April-June		7.3, 7.4