

Validation of Cameroon

Final assessment of progress in implementing the EITI Standard

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Acronyms

ASM	Artisanal and Small-Scale Mining
BEAC	Bank of Central African States
CAPAM	Support Framework for the Promotion of Artisanal Mining (Cadre d'Appui et de Promotion de l'Artisanat Minier)
CCIMA	Chambre de Commerce, d'Industrie, des Mines et d'Artisanat du Cameroun
CED	Centre pour l'Environnement et le Développement
CEMAC	Central African Economic and Monetary Community
COTCO	Cameroon Oil Transportation Company
DGI	Tax Department (Direction Générale des Impôts)
DGTFCM	Treasury and Public Accounts Department (Direction Générale du Trésor et de la Coopération Financière et Monétaire)
EITI	Extractive Industries Transparency Initiative
GICAM	Groupement Inter-Patronal du Cameroun
IMF	International Monetary Fund
INS	National Statistics Institute
MINFI	Ministry of Finance
MINMIDT	Ministry of Mines, Industry and Technological Development
MSG	Multi-Stakeholder Group
NGO	Non-Governmental Organisation
PRECASEM	Projet de Renforcement des Capacités dans le Secteur Minier
PSC	Production Sharing Contract
PWYP	Publish What You Pay
RELUFA	Réseau de Lutte contre la Faim
SNH	National Hydrocarbon Company (Société Nationale des Hydrocarbures)
SNI	National Investment Company (Société Nationale d'Investissement du Cameroun)
SOE	State-Owned Enterprise
SONARA	National Refining Company (Société Nationale de Raffinage)
VAT	Value-Added Tax
XAF	Central African CFA Franc
ToR	Terms of Reference
TOFE	Government Financial Operations Table
USD	United States Dollars

Executive summary

This Validation report presents the findings of the International Secretariat's Validation of Cameroon, which commenced on 1 October 2023. The draft report was finalised for review by the multi-stakeholder group (MSG) on 3 January 2024. Following comments from the MSG received on 31 January 2024, the Validation report was finalised for consideration by the EITI Board. The assessment suggests that Cameroon has fully met ten EITI Requirements, mostly met 12 and partly met eight requirements, with two requirements assessed as not applicable.

Key achievements

- There has been a gradual strengthening of the national oil company SNH's systematic disclosures with the publication of their AFS for 2021 for the first time. The EITI has provided a diagnostic of the rules and practices related to state participation in the oil and gas sector, including more granular data on SNH's 'direct interventions', although this has yet to be replicated in the mining sector for the new SOE SONAMINES. There is scope for further progress in the transparency of SNH's 'direct interventions' in accordance with government commitments under the ongoing programme with the International Monetary Fund (IMF).
- The EITI has led to better public understanding of the low level of government revenue mobilisation from the mining sector, which has led to reforms in state participation and subnational transfers in mining and led to plans to revise the 2016 Mining Code. Publication of mining contracts as a result of the EITI has led to robust public debate on the terms of the SINOSTEEL contract, although there is still a long road ahead to match that transparency in the oil and gas sector.
- Cameroon has published EITI data covering 21 fiscal years, in an increasingly disaggregated and reliable manner. There are significant opportunities for Cameroon to use its EITI process to leverage the use and analysis of these extensive datasets to support public debate and decision-making related to governance of the extractive industries and public finance management. Efforts to publish data in open and interoperable format could be strengthened and matched by more proactive efforts to disseminate particular data to specific stakeholders to support the translation of the transparency achieved through the EITI into greater accountability in the governance of the extractive industries.

Areas for improvements

- The response to Glencore's admission of guilt in 2022 related to bribing national oil and refinery company officials between 2012 and 2015 raises significant concerns over the credibility of Cameroon EITI. Despite two decades of EITI disclosures, Cameroon's EITI implementation did not identify these risks at the time. National stakeholders including the SNH have expressed significant frustration at the redaction of names of bribed

officials in Glencore's plea deals, and at the International Secretariat for not being able to force such disclosures from either Glencore or US and UK authorities. While steps are being taken by Cameroonian authorities to prosecute Glencore, there is no documented evidence of Cameroon EITI seeking to disclose data and information that could address this issue that has caused such public debate. The MSG's discussions of the Glencore affair in 2023 have consisted of acknowledging government steps to prosecute Glencore rather than considering disclosures in line with the EITI Standard that are relevant to the affair, such as detailed information on the national oil company's historical and current buyer selection practices, historical cargo-level crude oil sales data and copies of historical crude oil sales contracts.

- Improving the governance of the EITI in Cameroon is critical in order to achieve higher impact. There is a need to reinvigorate stakeholder engagement in the EITI process, including government leadership at the operational level and the establishment of an enabling environment for civil society engagement in all aspects of the EITI process and public debate on extractive industry governance. The government's enactment of a new decree governing EITI implementation in January 2024 marks an improvement in the MSG's statutory governance rules, which should be fully implemented to address some of the shortcomings identified in this Validation. The government's operational engagement in the EITI should be strengthened, including in the provision of sufficient technical and financial resources for implementation and in enhancing its oversight of the Cameroon EITI Secretariat. The government should take the lead in supporting improvements of the environment for civil society to play their critical role in the EITI process, while civil society should restructure its engagement in the EITI to ensure that the diversity of views in the constituency are adequately represented in the EITI.
- Cameroon's focus on production of EITI Reports in recent years has diverted attention away from outreach, use of EITI data, dissemination and communications activities that are key to strengthening the EITI's impact on natural resource governance in Cameroon. More proactive engagement by all three constituencies in using the EITI process to drive public debate could leverage Cameroon EITI's extensive datasets to support more evidence-based debate and public policy making.
- Cameroon has continued with a conventional approach to EITI disclosures that has not significantly improved the timeliness of EITI data. Yet Cameroon has innovated in extending the scope of its EITI implementation to oil and gas project cost disclosures, ahead of new provisions of the 2023 EITI Standard. There is scope for other extractive companies to follow the example of SNH and private gas company Gaz Du Cameroun in significantly strengthening their systematic disclosures of data required by the EITI Standard. Meanwhile ongoing reforms in public finance management provide an opportunity for strengthening the government's own systematic disclosures. A concerted effort to improve systematic disclosures in the coming years could allow Cameroon to re-engineer its EITI reporting process to build on systematic disclosures and adopt a more risk-based approach to disclosures and quality assurances.

Progress in implementation

EITI Validation assesses countries against three components – “Stakeholder engagement”, “Transparency” and “Outcomes and impact”.

Stakeholder engagement

There have been weaknesses in all three constituencies’ engagement in the EITI in the period under review. The state has provided effective high-level leadership, but this has not translated into sufficient operational engagement, particularly in the provision of sufficient technical and financial resources for the EITI and operational oversight of the Cameroon EITI Secretariat. Industry has focused its engagement on submitting reporting templates for EITI Reports and attending MSG meetings, rather than other aspects of the design, execution, monitoring and evaluation of the EITI process. There continue to be deep divisions within civil society, with evidence of certain civil society MSG members working for government bodies. While membership of the broader constituency has grown from around 15 to 35 organisations since the previous Validation, competitive nominations for only two of civil society’s eight seats on the MSG since inception has disenfranchised much of the constituency, based on stakeholder consultations. The government’s January 2024 EITI decree increases the number of civil society representatives from eight to 12 on the MSG, and opens up the nomination of these members based on open and competitive nomination procedures. Close to half of civil society members (those nominated directly by the EITI decree) have been on the MSG for over ten years. The fact that several current MSG members representing civil society organizations (named by the EITI Decree) currently work for (or have recently retired from) government is a concern given that the vast majority of the constituency’s engagement in the EITI process appears driven by the minority of CSOs that have been appointed to the MSG by the broader civil society constituency. These divisions play out with regards to the EITI in a broader environment of a deterioration in broader civic space indicators. This Validation report identifies breaches of the EITI protocol: Participation of civil society related to freedoms of expression and association (see Annexe A). The MSG has continued to oversee EITI reporting, effectively navigating the impact of the COVID-19 pandemic and the prolonged absence of key secretariat staff in 2021. However, oversight of the Secretariat’s operations has been insufficient, as reflected in continued delays in the regularisation of national secretariat staff contracts since the previous Validation and significant arrears in payment to key contractors (website provider¹ and Independent Administrator). There is a need for renewal of the MSG to strengthen its representativity, and to update Cameroon EITI’s governance documents to align them with the updates in both 2019 and 2023 EITI Standards.

Transparency

Cameroon published four EITI Reports (covering 2018-2021) since the previous Validation. Cameroon’s EITI Reports have continued to comprehensively and reliably disclose government revenues and company payments from the extractive industries, increasingly disaggregated at a project level. Cameroon has innovated in its EITI reporting by disclosing oil and gas project costs and in disclosing seizures of smuggled gold, which could be expanded to cover estimates of

¹ In November 2023, the website service provider took the Cameroon EITI [website](#) offline due to significant arrears in payment of its fees.

informal exports of other extractive commodities. There have been a few improvements in systematic disclosures of oil and gas license, production and export data through the websites of SNH and the MINMIDT. The improvements in SNH's systematic disclosures, which include publication of its audited financial statements for 2021 for the first time, have not yet been replicated in the mining sector with the new SOE SONAMINES. There is an opportunity in the planned reforms to the single Treasury account to strengthen systematic disclosures of government extractive revenues, including those not transiting through the Treasury accounts such as SNH's 'direct interventions' on behalf of the state, primarily for national security. Cameroon has progressed in publishing contracts in mining, but not in oil and gas. In beneficial ownership transparency, Cameroon has established an enabling legal framework for collecting ownership data from companies in all economic sectors, but not yet to enable the public disclosure of this information. While Cameroon EITI piloted data collection on beneficial ownership from all license-holders for the first time in the 2021 EITI Reports, reporting was limited. Cameroon's efforts to expand beneficial ownership data collection to companies operating in all sectors of the economy are welcome, but equal attention should be paid to the public accessibility of this ownership data. There are opportunities for Cameroon to more closely align its planned work on strengthening systematic disclosures of data required by the EITI Standard with ongoing reforms under the IMF programme and technical assistance from development partners such as the World Bank and bilateral agencies.

Outcomes and impact

Cameroon has faced challenges in driving outcomes and impacts in the period since the previous Validation, even if there is evidence of the EITI's impact on regulatory reforms and administrative practices (see Effectiveness and Sustainability Indicator 5). The MSG has agreed multiple work plans with different durations, including an emergency plan during Cameroon's suspension in April-June 2021. The process for developing the work plan does not appear to involve consultations with the broader constituencies, and the more specific objectives appear more narrowly linked to EITI implementation rather than broader natural resource governance issues. Technical and financial constraints have led to work plan activities being postponed, including in outreach and dissemination. The MSG's dissemination events have consisted only of formal annual launches at the Mont Fébé Hotel in Yaoundé involving a select group of personalities and media, rather than more concerted and consistent outreach efforts. In some ways the Cameroon EITI disclosures have contributed to public debate, such as the publication of the SINOSTEEL contract. In many other cases however, Cameroon EITI appears to have been more responding to, rather than driving, public debate, such as in the Glencore case. Government officials highlighted their efforts to request names of bribed Cameroonian officials and expressed significant frustration at the International Secretariat for not requiring Glencore or the UA and US authorities to disclose the names. Cameroon EITI has simply discussed the government's steps, without considering disclosures and analysis that could help inform public debate on the issue. Cameroon EITI is making efforts to disclose some of its data in open and inter-operable format, but not yet all data from its EITI Reports. Cameroon EITI's mechanism for following up on recommendations from EITI reporting and Validation involves some MSG oversight but does not appear sufficiently robust. Likewise, the MSG has published two annual progress reports right before this Validation, but has not consistently reviewed the outcomes and impacts of EITI implementation on an annual basis.

Validation scorecard

Component & module	EITI Requirement	Progress	Score
Overall score		Fairly low	53/100
Outcomes and impact	Work plan (#1.5)	Partly met	30 =
	Public debate (#7.1)	Partly met	30 ↓
	Data accessibility and open data (#7.2)	Mostly met	60 -
	Recommendations from EITI (#7.3)	Mostly met	60 ↓
	Outcomes & impact (#7.4)	Partly met	30 ↓
	Extra points: Effectiveness and sustainability indicators		
Component score: Outcomes and impact		Low	43/100
Multi-stakeholder oversight	Government engagement (#1.1)	Mostly met	60 ↓
	Industry engagement (#1.2)	Mostly met	60 ↓
	Civil society engagement (#1.3)	Partly met	30 ↓
	MSG governance (#1.4)	Partly met	30 =
Component score: Stakeholder engagement		Low	45/100
Overview of the extractive industries	Exploration data (#3.1)	Fully met	90 =
	Economic contribution (#6.3)	Mostly met	60 ↓
Legal and fiscal framework	Legal framework (#2.1)	Fully met	90 =
	Contracts (#2.4)	Partly met	30 -
	Environmental impact (#6.4)	Not assessed	- -
Licenses	Contract and license allocations (#2.2)	Mostly met	60 =
	License register (#2.3)	Mostly met	60 =
Ownership	Beneficial ownership (#2.5)	Partly met	30 -
State participation	State participation (#2.6)	Mostly met	60 =
	In-kind revenues (#4.2)	Fully met	90 =
	SOE transactions (#4.5)	Mostly met	60 ↓
	SOE quasi-fiscal expenditures (#6.2)	Mostly met	60 =
Production and exports	Production data (#3.2)	Fully met	90 =
	Export data (#3.3)	Fully met	90 =
Revenue collection	Comprehensiveness (#4.1)	Fully met	90 =
	Barter agreements (#4.3)	Not applicable	- =
	Transportation revenues (#4.4)	Fully met	60 ↓
	Disaggregation (#4.7)	Fully met	60 -
	Data timeliness (#4.8)	Fully met	90 ↑
	Data quality (#4.9)	Fully met	90 =
Revenue management	Distribution of revenues (#5.1)	Mostly met	60 =
	Revenue management & expenditures (#5.3)	Not assessed	- -
Subnational contributions	Direct subnational payments (#4.6)	Not applicable	- =
	Subnational transfers (#5.2)	Mostly met	60 =
	Social and environmental expenditures (#6.1)	Mostly met	60 -
Component score: Transparency		Moderate	71.5/100

How EITI Validation scores work

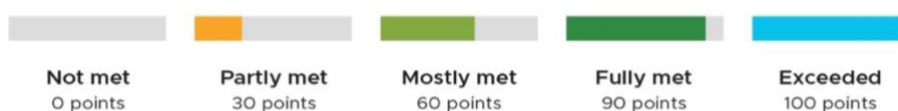
Component and overall score

The three components of EITI Validation – “Transparency”, “Stakeholder engagement” and “Outcomes and impact” – each receive a score out of 100. The overall score represents an average of the component scores.



Assessment of EITI Requirements

Validation assesses the extent to which each EITI Requirement is met, using five categories. The component score is an average of the points awarded for each requirement that falls within the component.



- **Exceeded** (100 points): All aspects of the requirement, including “expected”, “encouraged” and “recommended” aspects, have been implemented and the broader objective of the requirement has been fulfilled through systematic disclosures in government and company systems.
- **Fully met** (90 points): The broader objective of the requirement has been fulfilled, and all required aspects of the requirement have been addressed.
- **Mostly met** (60 points): Significant aspects of the requirement have been implemented, and the broader objective of the requirement is mostly fulfilled.
- **Partly met** (30 points): Significant aspects of the requirement have not been implemented, and the broader objective of the requirement is not fulfilled.
- **Not met** (0 points): All or nearly all aspects of the requirement remain outstanding, and the broader objective of the requirement is far from fulfilled.
- **Not assessed**: Disclosures are encouraged, but not required and thus not considered in the score.
- **Not applicable**: The MSG has demonstrated that the requirement doesn’t apply.

Where the evidence does not clearly suggest a certain assessment, stakeholder views on the issue diverge, or the multi-stakeholder group disagrees with the Secretariat’s assessment, the situation is described in the assessment.

1. Effectiveness and sustainability indicators

The country is awarded 0, 0.5 or 1 point for each of the five indicators. The points are added to the component score on Outcomes and impact.

1.1 National relevance of EITI implementation

This indicator considers the extent to which EITI implementation in Cameroon addresses nationally relevant extractive sector challenges and risks.

Cameroon EITI's two main work plans during the period under review, covering [2021-2023](#) and [2023-2025](#), include general objectives that are aligned with national development priorities, but the more specific objectives for the EITI work plans are more narrowly focused on the EITI process itself rather than broader national priorities. The objectives are initially proposed by the Cameroon EITI Secretariat before being refined by the MSG, but there is little evidence of proactive consultations with the broader constituencies, particularly in industry and civil society, in developing these work plan objectives (see *Requirement 1.5*). Cameroon's EITI implementation addresses some nationally relevant extractive industry challenges, such as contract disclosure and beneficial ownership transparency. However, the work plan does not link to important ongoing reforms, such as the implementation of the government's commitments related to oil and gas sector and public finance management reforms under the IMF agreement. The 2023-2025 work plan introduced plans to commission studies and develop action plans related to issues of significant public interest, such as on the energy transition, climate change, environmental protection, critical minerals trading, social and environmental expenditures and impacts, and gender considerations in extractive industry governance. However, there has been limited work on these issues by Cameroon EITI to date.

There is evidence that the MSG has agreed steps to go beyond the minimum requirements of the EITI Standard, although these predate the period under review (since January 2021). Indeed, Cameroon's EITI reporting has long expanded to the oil transportation and forestry sectors. The MSG's plans to consider expanding EITI implementation to other important aspects such as the energy transition, critical minerals and gender remain embryonic, given plans to develop action plans over the next three years. The MSG has only recently started to consider the use of the EITI process to discuss corruption risks, in the form of a debate on the Glencore corruption affair at the MSG's late August 2023 meetings.

While stakeholder consultations highlighted significant outcomes and impacts of the EITI process over the past three years, including publication of mining contracts, improvements in the execution of subnational transfers of mining revenues and the enactment of an implementing decree for the 2019 Petroleum Code, consulted stakeholders' opinions were split over whether the objectives set for Cameroon's EITI implementation were in the process of being achieved. Several government officials considered that the EITI was serving to improve the public's understanding of the extractive industries and related government revenues, which was considered a key step in ensuring that the governance of the extractive industries contributed to

economic development and poverty alleviation. However, several CSOs not directly represented on the MSG considered that Cameroon EITI was still far from achieving its objectives given insufficient contribution of the EITI to public debate and insufficient representativity of MSG members (see *Requirement 1.4*). The Secretariat considers that there are significant opportunities to improve the process for annual EITI work planning, including the design of EITI objectives aligned with all three constituencies' priorities for the extractive industries, and to strengthen the EITI's relevance to nationally relevant extractive industries governance challenges and risks.

The Secretariat proposes that zero additional points be added to the score on Outcomes and impact for this indicator.

1.2 Systematic disclosures of extractive industry data

There have been some improvements in specific government entities and companies' systematic disclosures of data required by the EITI Standard in the period under review. In particular, the national oil company SNH and a private oil and gas operator have expanded their systematic disclosures.

In the absence of a Ministry of Petroleum in Cameroon, the national oil company SNH's website routinely publishes the full text of [applicable laws and regulations](#) in the oil and gas sector, as well as the model production-sharing contract and concession contracts. The SNH [website](#) also publishes annually data in open format on oil and gas production, the state's in-kind revenues and sales of the state's and SNH's share of oil and gas production, albeit not yet disaggregated by buyer for oil sales. For the first time in 2023, a few days before the commencement of this Validation, the SNH [published](#) the complete version of its audited financial statements and related auditor report for 2021 (for both SNH-Mandat and SNH-Fonctionnement), significantly expanding its previous practice of only publishing an aggregate table with the national oil company's key aggregated financial data. The SNH [website](#) has also published annual reports up to and including 2020, although these do not detail its payments to government or its social or environmental expenditures. Systematic disclosures of EITI data by private extractive companies have remained far more limited. The sole example to date is oil and gas operator Gaz Du Cameroun, which has started re-publishing its completed EITI reporting templates on its corporate [website](#), although these appear to be ex post disclosures after the process of EITI reporting rather than timelier systematic disclosures.

In mining, the Ministry of Mines, Industry and Technological Development website is the only source of (limited) systematic disclosures on the sector, including the [full text](#) of some of the key laws and regulations in the mining sector and of six of the active mining contracts, as well as a set of 2016 [guidance](#) for various administrative procedures including mining license applications. The MINMIDT [website](#) also systematically discloses an overview of all active oil and gas contracts. The MINMIDT's cadastral [portal](#) systematically discloses information on active mining licenses. With regards to broader public finance management, the Chambre of Accounts ('Chambre des comptes') [website](#) discloses audits of government accounts up to and including 2020, while the Ministry of Finance [website](#) publishes the annual budget law, but not the state's

financial operations dashboard (*'Tableau des Opérations Financières de l'Etat'* – TOFE). The annual budget law and quarterly budget execution reports are published on the Ministry of Finance's General Direction of Budget [website](#). The National Statistics Institute's (INS) annual report on national accounts is published on its [website](#) and provides data on the extractive industries' contribution to GDP. Since September 2023, the INS [website](#) has also started republishing data from Cameroon EITI Reports in open format on the extractive industries' contribution to the national economy, although this remains a means of improving the accessibility of Cameroon EITI data from PDF-format reports rather than a form of systematic disclosures.

Progress in developing concrete plans for integrating the EITI in government and company systems has remained limited in the period under review. The 2021-2023 work plan included only general activities related to agreeing a roadmap on strengthening systematic disclosures, which does not appear to have been implemented during that three-year period. The 2023-2025 work plan includes plans for the development of a systematic disclosure policy and general reference to its implementation, without details on specific activities or workstreams to strengthen systematic disclosures. Although the 2018 Transparency Code translated a large number of EITI disclosure requirements into national legislation, the lack of issuance of an implementing decree for this code to date has meant that implementing of these public finance transparency and good governance provisions has not yet taken place.

There is significant scope for strengthening the integration of EITI data disclosures into routine government and company systems. The ongoing reform of the single Treasury account supported by the IMF, combined with implementation of the 2018 Transparency Code, could support an acceleration of the transition to systematic disclosures of data required by the EITI Standard.

The Secretariat proposes that 0.5 additional points be added to the score on Outcomes and impact for this indicator.

1.3 Environment for citizen participation in extractive industry governance

This indicator considers the extent to which there is an enabling environment for citizen participation in extractive sector governance, including participation by affected communities.

There appear to be limited channels to support the participation of citizens, particularly from affected communities, in decision-making related to extractive industry governance, within Cameroon's legal and regulatory framework for the extractive industries. This is supported by international rankings of civic space in Cameroon, such as the 2023 [Freedom in the World](#) ranking that found that government decisions, particularly those by Presidential Decree, were often made without public consultation. There is currently no Freedom of Information law in Cameroon, and consultations with stakeholders, particularly with civil society not directly represented on the MSG, highlighted challenges in accessing government documents related to the extractive industries. Nonetheless, there have been instances of public consultations with civil society in the development of certain government reforms in this period. For instance, the development of Law 2021/023 on the legal environment for civil society organisations was

developed in consultation with several Ministries, the Chamber of Commerce, Industry, Mines and Crafts, and CSOs according to the 2021 [CSO Sustainability Index](#) for Cameroon. There is also evidence of civil society input to the development of the 2019 Petroleum Code's implementing decree in 2022 (see *effectiveness and sustainability indicator 5*).

There is no evidence that the MSG has reviewed policies or practices related to strengthening citizen participation in extractive industry governance, nor discussed adherence to provisions of the EITI protocol: Participation of civil society. Here appear to be technical and financial constraints hindering civil society's capacity to engage in the EITI longer term. While most CSOs consulted considered that they had adequate technical capacities to fully engage in all aspects of the EITI process, some stakeholders from government and civil society noted the need for further capacity building on technical aspects of the EITI Standard and the functioning of the oil and gas sector, in particular for civil society. All CSOs consulted repeatedly raised the challenge of financial capacity constraints that hindered CSOs' ability to play a greater role in the EITI process. These financing constraints were not due to government restrictions but rather to the changing focus of international donors' support, although many CSOs consulted called for the government to be more proactive in providing funding to CSOs involved in the EITI and for the financing provisions agreed for civil society's OSCC-ITIECAM coordination platform to be implemented to ensure adequate funding for CSOs engaged in the EITI.

There is no evidence that EITI implementation has had an effect on communities in regions with extractive activities, nor on civic space related to the extractive industries more generally. Many stakeholders consulted, particularly from civil society, considered that there had been no outreach and dissemination to communities hosting extractive activities, and thus that the EITI process had had no impact on these communities to date. However, some government officials considered that the EITI had led to greater clarity on the lack of subnational transfers of a share of mining taxes, particularly from artisanal mining, and led to the first set of subnational transfers of mining tax revenues. However, such advances need to be set against the broader constraints identified in the environment for civil society engagement in the EITI process and public debate on extractive industry governance (see *Requirement 1.3*). The civil society constituency's detailed comments on the draft Validation report reject this categorisation of a lack of EITI impact on host communities, noting that some CSOs' outreach efforts among communities hosting mining activities in the east of the country led to the formulation of a common position calling for the development of implementing regulations for the 2016 Mining Code.

The Secretariat proposes that zero additional points be added to the score on Outcomes and impact for this indicator.

1.4 Accessibility and use of extractive industry data

This indicator considers the extent to which extractive sector data is accessible and used for analysis, research and advocacy.

The most comprehensive disclosures about Cameroon's extractive industries are the Cameroon EITI Reports, four of which (2018-2021) have been published since the previous Validation. The

limited systematic disclosures of EITI data on government and company websites consist of disclosures by the SNH, MINMIDT, the Ministry of Finance's Budget Department and the National Statistics Institute (INS). The only systematic disclosures available in open format are SNH's [open data](#) on oil and gas production and the state and SNH's shares of production. Cameroon EITI has made some efforts to disclose summary data in open format and, from the 2020 EITI Report onwards, the annexes of the EITI Reports in open format to facilitate use, even if the full datasets of the EITI Reports have yet to be published online. Since September 2023, the INS has started a data portal republishing the INS data submitted to Cameroon EITI in open format on the extractive industries' contribution to the national economy.

While Cameroon has published a remarkable four EITI Reports in 2.5 years, it has struggled to ensure reporting that is timelier than two years after the end of the fiscal period covered in the EITI Report, even if the 2021 EITI Report published in October 2023 is a step towards timelier disclosures. Cameroon's EITI data is used by some CSOs like CRADEC, AGNR, RELUFA, PWYP Cameroon as well as some other researchers, although the promotion of EITI data beyond publication of excel spreadsheets on the Cameroon EITI website has remained limited to date. With 21 years of data from Cameroon's EITI disclosures over its 17 years of EITI membership, there is significant potential to draw on this data for time series analysis and, increasingly with more recent EITI data, project-level payment traceability. The lack of promotion, use and analysis of different types of EITI datasets has remained a missed opportunity of Cameroon's EITI process, which has remained overly focused on the production of EITI Reports.

There is evidence that some EITI disclosures have contributed to public debate. For instance, when the Ministry of MINMIDT published the mining contract with SINOSTEEL in early 2023, the terms of the contract led to significant public debate and to the Minister of MINMIDT discussing the contract with Parliament (see *Requirement 7.1*). On the Glencore affair, the MSG did not publish any statement or views on the issue in 2022 aside from republishing SNH's May 2022 [press release](#) that stated that SNH did not engage in such practices. In January 2023, the International Secretariat submitted a letter to the Cameroon EITI Champion, Minister of Finance Motaze, to follow up the EITI Board Chair's [statement](#) released in May 2022 calling on the governments of relevant EITI member countries including Cameroon to examine the Glencore case, take swift action, and establish adequate preventive measures. In August 2023, over a year after the Glencore plea agreement, the Cameroon EITI MSG held an MSG meeting to discuss the Glencore affair, with updates from key government agencies. Meanwhile, there has been significant public debate on the Glencore affair in Cameroon. A civil society member not involved in the EITI process, founding head of Transparency International Cameroon Akere Muna, filed law suits against the three companies in Cameroon named in the Glencore affair. Such activism by some civil society actors entirely outside of the EITI process makes the lack of MSG public views on the affair even more concerning. The civil society constituency's comments on the draft Validation report note that some members of the broader constituency engaged in the EITI have led advocacy campaigns on the Glencore affair, citing examples of press conferences held by CSOs including Transparency International Cameroon, CENC, ACIC and PWYP. Yet there are significant opportunities for a better capacitated Cameroon EITI to leverage its EITI datasets to inform public debate on specific issues, e.g. analysis of cargo-level crude oil sales data.

The Secretariat proposes that zero additional point be added to the score on Outcomes and impact for this indicator.

1.5 EITI-related changes to extractive industry policy and practice

This indicator considers the extent to which EITI has informed changes in extractive sector policies and practices.

Although there appear to be weaknesses in the multi-stakeholder oversight of Cameroon EITI's mechanism for following up on EITI recommendations (see *Requirement 7.3*), there is evidence that follow-up on recommendations from EITI reporting have led to some tangible reforms in government laws and regulations related to the extractive industries. Consultations with stakeholders from all constituencies attributed specific government reforms since January 2021 to follow-up on EITI recommendations. For instance, following the same recommendations in successive EITI Reports, the government issued the implementing decree ([2023/232](#)) to the 2019 Petroleum Code in May 2023. While implementing decrees for the 2016 Mining Code and the 2018 Transparency Code are still pending, stakeholder consultations noted plans to reform the 2016 Mining Code rather than issuing such implementing regulations. A second example of government reforms attributed to follow-up on EITI recommendations is the formation of an inter-ministerial committee to address bottlenecks in the calculation and execution of subnational transfers, particularly those related to a share of mining tax collected from artisanal miners. Following reforms led by this inter-ministerial committee, the first set of subnational transfers of mining tax revenues collected by the new mining SOE SONAMINES were executed in October 2023. More broadly, several stakeholders consulted from all constituencies lauded Cameroon EITI for drawing public attention to the low level of government revenues collected from the mining sector, which they considered was a key factor in establishing SONAMINES as a SOE in the mining sector. Many stakeholders also highlighted the publication of the full text of active mining contracts as an important outcome of the EITI process. Finally, several stakeholders highlighted the inclusion in the 2023 Budget Law of a requirement for companies in all economic sectors to report their beneficial ownership to the tax department (DGI), which was operationalised through its implementing [decree 2023/06801](#), as due to EITI advocacy.

Beyond the impact of follow-up on EITI recommendations, the use of Cameroon EITI findings and data to inform public policy making appears to have been more limited in the past three years. For instance, the MSG does not appear to have yet made use of Cameroon EITI disclosures on crude oil sales and the sale of the state's in-kind revenues to inform public debate and policy-making in response to the Glencore corruption affair, which was directly linked to the process for selling the state's in-kind revenues. There are opportunities for Cameroon EITI to strengthen its dissemination of EITI findings and key datasets, as well as its mechanism for following up on EITI recommendations, to improve the use of EITI outputs to support reforms in extractive industry policies and practices.

The Secretariat proposes that 0.5 additional points be added to the score on Outcomes and impact for this indicator.

2. Outcomes and impact

This component assesses EITI Requirements 7 and 1.5, which relate to progress in addressing national priorities and public debate.

Progress by requirement and corrective actions

The detailed assessment of progress in addressing each EITI Requirement or corrective action is available from the data collection templates referenced in annex to this report.

EITI Requirement / past corrective action and assessment	Summary of progress in addressing the EITI Requirement
<p>Work plan (Requirement #1.5)</p> <p><i>Partly met</i></p>	<p>The Secretariat’s assessment is that Requirement 1.5 is partly met, as in the previous Validation. The Secretariat’s view is that the objective of ensuring that the annual planning for EITI implementation supports implementation of national priorities for the extractive industries while laying out realistic activities that are the outcome of consultations with the broader constituencies is not achieved, but that there have been some minor improvements since the previous Validation. Cameroon EITI’s work planning process has been one of a succession of emergency action plans for much of the period under review, rather than a planned consultative process that involves input from the broader constituencies from the inception of developing the work plan. The ad hoc approach to work planning, combined with the lack of evidence of substantive consultations with the broader constituencies in agreeing work plan objectives, means that the objective is still far from being fulfilled. Most stakeholders did not express particular views on the work plan, although several stakeholders from all constituencies considered that the work plan objectives were aligned with national priorities as described in official government documents. The MSG’s comments on the draft Validation report argue for an upgrade in the assessment of Requirement 1.5. They note that the successive 2021-23 and 2024-26 triennial work plans were prepared in accordance with the EITI Standard and ensured they were publicly accessible. They explain that the emergency work plan covering 2021-22 was developed in the context of Cameroon’s suspension and the related conjunctural challenges, and that the 2023 work plan was developed based on broader consultation. Reference to several minutes of MSG meetings are included, the records of which include comments from MSG members but not evidence of submissions from the broader constituencies. While the International Secretariat acknowledges these points, it notes that the public availability of a current work plan to frame EITI implementation was not consistently ensured during the period</p>

	<p>under review. While more recent improvements are noteworthy, more consistent consultations with the broader constituencies would be needed to strengthen both stakeholder engagement and Cameroon EITI’s outcomes and impacts.</p> <p>The MSG has regularly adopted new EITI work plans in the period under review, although these work plans have only been agreed and published with significant delays, often over six months after the start of the calendar year and not consistently updated on an annual basis. Since the last Validation, the MSG approved a three-year work plan covering 2021-2023 in November 2020. However, following Cameroon’s suspension in April 2021 for delays in its EITI reporting, the MSG agreed a “mini-action plan” for the lifting of Cameroon’s suspension July 2021, which covered the period April-July 2021. Following the lifting of Cameroon’s suspension in July 2021, the MSG approved a work plan for 2021 that built on relevant sections of the 2021-2023 work plan. There is no evidence that the MSG updated either the 2021-2023 work plan or broke it down to an annual work plan in 2022. In late August 2023 however, the MSG agreed a new three-year work plan covering 2023-2025. The 2023-2025 work plan was only published on the Cameroon EITI website on 8 October 2023, more than a month after its adoption by the MSG (although the Cameroon EITI website (including the work plan) was taken offline in November 2023 given arrears in payment to the website provider).</p> <p>The 2021-2023 and 2023-2025 work plans include a section linking the work plan objectives to national priorities including the 2020-2030 Growth and Employment Strategy Document (DCSE), the 2030 National Development Strategy (SND30), the Cameroon Industrialisation Master Plan (PDI) and the government’s policy for decentralisation since 2018. While the two general objectives of the three-year work plans are partly linked to national priorities, namely improving extractive industry governance, the six specific work plan objectives are only narrowly linked to the EITI process rather than broader national priorities. The 2021-2023 work plan includes as its second axis the mainstreaming of EITI disclosures through government and company systems, but includes only general activities related to agreeing a roadmap on strengthening systematic disclosures. The 2023-2025 work plan includes a work stream under Axis II.2 for the development of a systematic disclosure policy and general reference to its implementation, without details on specific activities or workstreams to strengthen systematic disclosures.</p> <p>The development of the 2023-2025 work plan involved some level of consultations with stakeholders beyond the MSG, although the level of input from the three broader constituencies remains unclear based on available documentation. The MSG’s ‘Outcomes and impact’ template notes that the Cameroon EITI Permanent Secretariat prepares a draft of the work plan for review both by the MSG and the broader industry and civil society constituencies, before being finalised in a two-day MSG workshop in August 2023. Consultations with CSOs engaged in the broader constituency on EITI but not directly represented on the MSG noted that there had been limited opportunities for the broader constituency to provide input to the</p>
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	<p>development of the work plan, given the limited coordination with the broader constituency primarily led by the MSG member from the OSCC-ITIE platform, such as the CRADEC in particular. The industry constituency’s comments on the draft Validation report argue strongly that the broader industry constituency has consistently been consulted in developing Cameroon EITI work plans, citing evidence of extractive companies’ emails to the Cameroon EITI Secretariat.</p> <p>The 2021-2023 and 2023-2025 work plans include time-bound activities to achieve the objectives, which are costed with the source of funding indicated. The 2023-2025 work plan includes only planning per year but presents clear activities, although their link to a monitoring and evaluation framework could be considerably strengthened. However, the activities are not consistently measurable, with general activities such as “follow-up on EITI recommendations” relatively imprecise and challenging to track. The 2021-2023 and 2023-2025 work plans include activities related to addressing capacity constraints of MSG members and the permanent secretariat, including an ambitious list of capacity building activities. Consultations with stakeholders both on and off the MSG, particularly from civil society, noted concerns that many of the planned capacity building activities were not implemented in practice due to budget constraints.</p> <p>The 2021-2023 and 2023-2025 work plans include a few activities related to extending the scope of EITI implementation, mainly focused on contract and beneficial ownership transparency as well as mainstreaming EITI disclosures. The three-year work plan includes workstreams to develop action plans on the energy transition, climate change, environmental protection, critical minerals trading as well as planned studies on social and environmental expenditures and impacts, and on gender considerations. The 2021-2023 and 2023-2025 work plans both include activities linked to ensuring public disclosure of extractive contracts and beneficial owners, although they could be articulated in more detail to improve the way in which they can be monitored.</p> <p>The 2023-2025 work plan includes only a few activities aimed at addressing legal and regulatory barriers to EITI implementation, including a study on legal aspects and challenges to contract transparency planned for 2024 and plans to enact a new Government Decree for the EITI planned for 2023. There are no activities related to addressing legal and regulatory barriers related to the lack of implementing decrees for the 2016 Mining Code or the 2018 Transparency Code. The 2021-2023 and 2023-2025 work plans include general activities linked to following up on recommendations from EITI Reports (categorised as “the IA’s recommendations”) and from Validation, but do not provide any detail on the specific recommendations.</p> <p>A total of 83% of the 2021 work plan was fully implemented according to the 2021 annual progress report, while only 48% of the 2022 work plan was implemented according to the 2022 annual progress report. Consultations with stakeholders beyond the MSG, particularly from civil society, gather views that were highly critical of the level of implementation of the Cameroon EITI</p>
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	work plan and concerns over the transparency and accountability in the implementation of work plan activities, particularly those related to capacity building, outreach and dissemination.
<p>Public debate (Requirement #7.1)</p> <p><i>Partly met</i></p>	<p>The Secretariat’s assessment is that Requirement 7.1 is partly met, which is a regression from the previous Validation. The Secretariat’s view is that the objective of enabling evidence-based public debate on extractive industry governance through active communication of relevant data to key stakeholders in ways that are accessible and reflect stakeholders’ needs has not been fulfilled in the period under review. Several consulted stakeholders, particularly from civil society, considered that the objective had not been fulfilled in the period under review given limited outreach and communication efforts, particularly at the subnational level in extractive-rich regions. The Secretariat considers that the public debate on extractive issues since the previous Validation, such as on the Glencore affair, has been separate from Cameroon EITI’s outreach and dissemination of EITI information and that the Cameroon EITI communication efforts have been insufficient to make progress towards the objective of EITI data enabling public debate. The single EITI Report launch events are not considered sufficient to progress towards the objective of the EITI informing public debate, with evidence of civil society’s outreach and dissemination yet to be matched by active dissemination efforts by the other constituencies. The MSG’s comments on the draft Validation report argue for an upgrade in the assessment of Requirement 7.1, given the vitality of public debate around issues related to the extractive industries. While they note examples such as the Glencore affair, the terms of the SINOSTEEL contract, Savannah Energy’s acquisition of ExxonMobil’s interests in the Chad-Cameroon oil pipeline and the murder of journalist Martinez Zogo, the links provided to print and broadcast media coverage of these debates do not indicate Cameroon EITI findings and data being actively disseminated and promoted to support this public debate. For instance, the coverage in September 2023 of CSO MSG members’ calls for investigations of Glencore do not reflect the use of EITI data to support this public debate. The International Secretariat acknowledges that there has been some improvement in some CSO MSG members’ public advocacy around extractive industry issues of public debate. However, it considers that a more systematic approach to designing and conducting EITI public dissemination and outreach would strengthen the EITI’s contribution to evidence-based public debate and policymaking.</p> <p>Cameroon has published four EITI Reports (covering 2018-2021) since January 2021, partly to make up for lost time following its temporary suspension in April-June 2021 for delays in publishing the 2018 EITI Report (see <i>Requirement 4.8</i>). The EITI Reports are published on the Cameroon EITI website and republished on the websites of the Ministries of Finance and of MINMIDI. Cameroon EITI has asked the IA that prepared the EITI Reports to prepare executive summaries of the EITI Reports (published on the same webpage as the EITI Reports, up to 2020), although these remain dense documents that are not significantly more accessible (in language, style or format) than EITI Reports. Thematic reports or extracts of EITI data tailored to</p>

	<p>specific target groups do not appear to have been produced in the period under review. Cameroon EITI has produced some simplified communications products in the period since the previous Validation. In 2021, it produced two newsletters (in French and English), two kakemono wall hangings related to the publication of EITI Reports, and launched the preparation of simplified summaries of the 2017, 2018 and 2019 EITI Reports that were completed in 2022, even though these were not published in 2021 according to the 2021 annual progress report. In 2022, Cameroon EITI published some additional simplified communications products in English. The Cameroon EITI website provides an overview of media coverage in the 2021-2023 period, which list six newspaper articles in Cameroon EITI in 2021, 18 in 2022 (around half of which were linked to the Glencore affair) and 59 in 2023 (around half of which covered the International Secretariat’s April 2023 mission to Yaoundé). Civil society organisations such as PWYP Cameroon have published a few thematic reports, most notably on contract disclosure, but these have not been republished or promoted by Cameroon EITI.</p> <p>Cameroon EITI has continued to primarily publish EITI Reports in full, rather than seeking to explain EITI data in clear and comprehensible terms. Translation of documents has been a broader challenge for the MSG’s operations (see <i>Requirement 1.4</i>) but is also reflected in the overwhelmingly francophone nature of Cameroon EITI’s communications, despite the bilingual nature of the country. While Cameroon EITI has had a Communications Strategy in place for the 2020-2022 period, which it broke down into Communications Strategies for 2020 and 2021, its 2021 annual progress report is transparent in noting that the strategy had not been effectively implemented as of end-2021. Indeed the 2020-2022 Communications Strategy was only translated into the second national language (English) in 2022, according to the 2022 annual progress report. The MSG does not appear to have taken actions to consider different access challenges and information needs of different genders and subgroups of citizens in its communications activities in this period.</p> <p>Cameroon EITI has ensured that some outreach events organised by government have been undertaken to spread awareness of and facilitate dialogue about governance of extractive resources, although these appear mainly limited to formal EITI Report launch events. Thus, it has held high-level launch events for its EITI Reports chaired by the MSG Deputy Chair the Minister of Mines, bringing together some members of the broader constituencies and covered in the press, since the previous Validation. It held launch events for the 2018 EITI Report on 29 June 2021, for the 2019 EITI Report on 19 November 2021 and for the 2020 EITI Report on 16 December 2022. The EITI Report launch events have tended to gather around 100 participants including the MSG and EITI focal points, with televisions and radio broadcast coverage of the events. These are formal launch events, rather than for active public debate. Other outreach and dissemination events led by Cameroon EITI appear to have been severely limited in this period. The 2021 annual progress report only lists the two EITI Report launch events and makes general reference to public statements by the MSG Deputy Chair, Minister of</p>
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	<p>Mines Gabriel Dodo Ndoke, as evidence of EITI communications. Cameroon EITI's online activities were equally limited in this period. Although the MSG agreed ToR to upgrade the Cameroon EITI website in 2021 and reinvigorate the Cameroon EITI Twitter and Facebook accounts, the website does not appear to have been upgraded to date. The Cameroon EITI Twitter contains ten posts from 2021, seven posts from 2022 and nine posts from 2021, while its Facebook page includes 20 posts from 2021, 18 posts from 2022 and 11 posts from 2023.</p> <p>The civil society constituency has led several of their own outreach and dissemination activities in this period however, even if engagement in EITI communications from the other two constituencies is not clearly documented. Thus, in 2021, civil society organised a three-day mining forum in the eastern town of Bertoua in January 2021, a debate conference on the management of mining revenues in May 2021, and contributions to the first two-day Pan-African Conference on Illicit Financial Flows in October 2021, as documented in the 2021 annual progress report. Civil society also participated in a radio show on extractive industries and sustainable development in January 2021. Civil society has published occasional position papers and advocacy notes. In 2021, the Oxfam Novib-funded CRADEC project on equitable mining issued a position paper on behalf of host communities calling for enactment of implementing regulations for the 2016 Mining Code. However, consultations with civil society raised significant concerns over weaknesses in EITI-related outreach and dissemination. Many CSOs consulted considered that Cameroon EITI efforts were insufficient and focused only on the capital city Yaoundé, not in extractive-rich regions. They also repeatedly highlighted civil society's own financial capacity constraints, which hindered their ability to plan more proactive outreach and dissemination in extractive-rich regions.</p> <p>The industry constituency's comments on the draft Validation report argue that extractive companies conduct outreach and dissemination activities targeting their key stakeholders, defined as communities around their activity sites. While the International Secretariat acknowledges extractive companies' bilateral outreach and dissemination activities planned as part of their commercial operations, it continues to find little evidence of the use of EITI findings and data in these outreach and dissemination efforts. There are opportunities for extractive companies to make greater use of EITI findings and data to support and help drive public debate around extractive industry governance, particularly in relation to their key stakeholders around extractive activity sites.</p> <p>Despite the lack of more proactive dissemination efforts, some Cameroon EITI disclosures have led to significant public debate in this period on a few specific issues during the period under review. For instance, the publication of the SINOSTEEL contract in 2022 led to such public debate that the Minister of MINMIDT was asked to defend the terms in front of Parliament. However, Cameroon EITI has not discussed other current issues in the extractive industries despite public debate, such as the potential impact on Chadian crude oil exports via Cameroon following a change in operatorship of Chad's</p>
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	<p>Doba oil project and in the equity structure of the Chad-Cameroon oil pipeline. Other public debate about scandals appears to have been incidental to the EITI process. There was considerable public debate in the national press about Glencore’s admission of corruption involving Cameroon’s national oil company SNH in 2022. For instance, Equinoxe TV carried a televised debate on the Glencore affair in June 2022 following the Glencore plea agreement that named Cameroon’s SNH and SONARA. However, Cameroon EITI does not appear to have made any contributions to this public debate until 2023, with only a press release from SNH in May 2022 stating that the national oil company does not engage in such practices. Only following the International Secretariat’s mission did the MSG hold a discussion on the issue at its late August 2023 meeting. Stakeholders from all constituencies involved in the EITI expressed significant frustration at the International Secretariat for the lack of public disclosures of the names of corrupted Cameroonian officials for them to investigate, despite the fact that Glencore is an EITI supporting company. While stakeholders saw the value of a data analysis of crude oil sales in 2017-2020 prepared by the International Secretariat, none of the stakeholders consulted could explain why Cameroon EITI could not conduct this type of analysis on crude oil exports for the 2012-2015 period concerned by the Glencore affair.</p> <p>Overall, the Secretariat considers that there are significant gaps in the technical aspects of Requirement 7.1. These include the lack of any distribution in print format despite access challenges, the lack of translation in appropriate languages (e.g. English) in a timely manner and the limited outreach and dissemination events held by Cameroon EITI and all three constituencies, including civil society, which could allow for more critical public debate using EITI data.</p>
<p>Data accessibility and open data (Requirement #7.2)</p> <p><i>Mostly met</i></p>	<p>The Secretariat’s assessment is that Requirement 7.2 is mostly met. The Secretariat’s view is that the objective of enabling the broader use and analysis of information on the extractive industries, through the publication of information in open data and interoperable formats, is mostly achieved, given delays in publishing all data from Cameroon’s EITI Reports in open format. The MSG’s comments on the draft Validation report argue for an upgrade in the assessment of Requirement 7.2, based on the fact that the MSG had approved the Cameroon EITI open data policy in 2017 and that this led to the operationalisation of open data publication practices by stakeholders such as Gaz du Cameroon. They also note the public availability of EITI summary data files on the Cameroon EITI and relevant ministry websites. While the International Secretariat acknowledges these points, it notes that all data in Cameroon’s EITI Reports has not yet been published in open format in accordance with Requirement 7.2.b, beyond the publication of summary data files for each EITI Report.</p> <p>Cameroon EITI has had an open data policy since 2017 that defines the terms for release, use and reuse of EITI data. While the policy is published on the Cameroon EITI website, it is challenging to locate without a specific search given that it is not linked to from any webpage on the Cameroon EITI website.</p>

	<p>Since the last Validation, Cameroon EITI has started publishing the annexes to its EITI Reports in open format, with annexes to the 2020 EITI Report and the 2021 EITI Report published in open format. However, all data sets in the EITI Reports have not yet been published in open format, even if the annexes contain much of the required information. In September 2023, the National Institute of Statistics (INS) launched a portal republishing the data on extractive industries' contribution to GDP, exports and employment from EITI Reports, with an option for bulk download in open format.</p> <p>Cameroon EITI has prepared Summary Data files for the 2018, 2019, 2020 and 2021 EITI Reports published since the last Validation, which it submitted to the International Secretariat and published on its website. None of the data that is systematically disclosed on government and extractive company websites appears yet available in open format, with the notable exception of SNH's systematic annual disclosures of production and the state's in-kind revenues. While the assessment of Requirement 7.2 appears borderline between 'mostly met' and 'fully met', given that the annexes to the EITI Reports published in open format contain much of the data in the EITI Reports, the Secretariat considers that the lack of publication of all EITI data in open format is a concern given the uses of this data by other government portals such as the INS open data portal.</p>
<p>Recommendations from EITI implementation (Requirement #7.3)</p> <p><i>Mostly met</i></p>	<p>The Secretariat's assessment is that Requirement 7.3 is mostly met, which is a regression since the last Validation. Stakeholders consulted did not express particular opinions on the objective of ensuring that EITI implementation is a continuous learning process that contributes to policymaking. The Secretariat's view is that, despite the fact that there is a regular follow up of findings and recommendations from the EITI process, the mechanism for follow-up on EITI recommendations is not sufficiently robust given the insufficient implementation of both corrective actions from previous Validations and recommendations from EITI Reports, which has weakened the effectiveness of the EITI's contribution to policy making during the period under review. The Secretariat's view is that there is a mechanism for follow-up on EITI recommendations, which has tended to focus on follow-up on recommendations related to disclosures rather than broader sector reforms or implementation of recommendations and corrective actions related to Cameroon EITI's governance. Several stakeholders consulted from all constituencies held significantly different views on progress towards the objective, and considered that the objective had been fulfilled given the evidence of tangible reforms in issuing decrees on beneficial ownership and overcoming bottlenecks to subnational transfers of artisanal mining revenues. The MSG's comments on the draft Validation report argue for an upgrade in the assessment of Requirement 7.3. They highlight that the MSG has regularly discussed a matrix of the status of follow-up on EITI recommendations during its meetings in 2021-23. They argue that the MSG's discussions of this matrix allowed them to remain updated on advances and challenges in the implementation of specific corrective actions and recommendations. The International Secretariat notes these clarifications, which warrant an upgrade in the assessment of Requirement 7.3 from 'partly met' to 'mostly met', but</p>

	<p>emphasises the need for Cameroon EITI to strengthen its follow-up on EITI recommendations, ensuring that the mechanism to do so is robust and publicly accountable.</p> <p>The MSG has tracked progress in following up on corrective actions and strategic recommendations from the previous Validation through a dedicated matrix, which appears to be regularly updated. Stakeholder consulted explained that the mechanism for follow-up on recommendations from EITI Reports consists of the MSG delegating the follow-up to an ad hoc working group composed of both MSG members and national secretariat staff. This ad hoc working group has the responsibility of following up EITI recommendations from both Validation and EITI Reports, in addition to its main role of reviewing draft EITI Reports. The ad hoc working group follows an MSG-adopted ToR, which details its role, members and responsibilities. This working group held several meetings in 2023 in particular, although neither the working group's ToR, the working group's resolutions or the matrix of follow-up on EITI recommendations have been made public.</p> <p>In practice, there is evidence from MSG meeting minutes that the MSG has regularly discussed the source and nature of discrepancies in the reconciliation of company payments and government revenues, but has focused less on EITI recommendations linked to broader sectoral reforms. Consulted stakeholders from government and the national secretariat indicated that, in practice, the National Coordinator plays a key role in personally following up on EITI recommendations with specific government agencies. For instance with regards to recommendations related to disclosures by SNH, several stakeholders confirmed that the National Coordinator followed up with SNH directly, without involvement of the MSG. The SNH representative on the MSG participated in MSG meetings, and this was considered the mechanism linking SNH's follow-up on EITI recommendations with the MSG's oversight. However, minutes of MSG meetings do not indicate that SNH's implementation of reforms linked to EITI recommendations have been discussed at MSG meetings.</p> <p>The primary progress has been in the implementation of recommendations related to EITI reporting, although there are still a number of these recommendations yet to be implemented. The 2021 EITI Report indicates that five recommendations from 2019 EITI Report and more than ten recommendations from the 2018 and previous EITI Reports are yet to be implemented. With regards to recommendations from previous two Validations, several recommendations (and corrective actions) related to stakeholder engagement and outcomes and impact are yet to be implemented, Stakeholders consulted seemed aware of weaknesses identified as the basis of these recommendations, although few actions were taken to date, even if progress on corrective actions related to transparency was stronger.</p> <p>Yet the Secretariat's review of EITI Reports and stakeholder consultations indicate that follow-up on EITI recommendations has led to concrete government legal and administrative reforms. Stakeholders consulted from all constituencies considered that reforms such as the expansion of beneficial ownership reporting requirements to companies in all sectors of the economy</p>
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	<p>was due to advocacy by the EITI, even if such ownership reporting was not yet public. They also highlighted implementation of reforms in the calculations and disbursements of subnational transfers linked to (particularly artisanal) mining revenues was attributable to EITI follow-up. Stakeholders also highlighted reforms such as SNH’s systematic disclosures of oil production and sales in open format and the full text of its 2021 audited financial statements was due to the EITI (see <i>Effectiveness and sustainability indicator 5</i>).</p> <p>While recognising the importance of reforms implemented in the period under review, the Secretariat considers that the mechanism in place for the MSG to follow up on recommendations from EITI reporting and Validation is fragmented and not sufficiently robust. The MSG’s ad hoc working group on reporting also oversees follow up on recommendations (and thus likely prioritises recommendations related to EITI reporting), using a matrix that is not publicly accessible. The National Coordinator is responsible for the follow up with specific entities like SNH to implement certain EITI recommendations, with unclear oversight of the MSG. Meanwhile there is little evidence of the MSG discussing the status of follow-up on recommendations related to broader extractive industry governance or public finance management reform. Thus, the Secretariat considers that the objective is still in the process of being fulfilled.</p>
<p>Review the outcomes and impact of EITI implementation (Requirement #7.4)</p> <p><i>Partly met</i></p>	<p>The Secretariat’s assessment is that Requirement 7.4 is partly met, which is a regression since the previous Validation. Most stakeholders consulted did not express particular views on whether the objective of ensuring regular public monitoring and evaluation of EITI implementation had been achieved. However, several stakeholders considered that this had not been consistently met in the period under review, given that the publication of the 2021 and 2022 annual progress reports were delayed until right before Validation. The Secretariat’s view is that the broader objective is not met given the delay in publishing the APRs, which had already been raised as a corrective action from the previous Validation that has not been addressed. This situation prevents EITI Cameroon from ensuring regular public monitoring and evaluation of implementation, particularly given the lack of sufficient attention to documenting impact and the limited evidence of consultations with the broader constituencies in the annual review. The MSG’s comments on the draft Validation report argue for an upgrade in the assessment of Requirement 7.4, albeit conceding that the publication of the 2021 and 2022 annual progress reports in September 2023 was delayed. However, the comments explain that the MSG has consistently reviewed the status of follow-up on EITI recommendations at the start of each year, which leads to a discussion of EITI outcomes and priority activities for the year ahead. They also argue that the MSG’s 2017 open data policy provided the framework for developing the 2023 work plan. While the International Secretariat acknowledges these points, it continues to emphasise the lack of a publicly accessible review of the EITI’s outcomes and impacts on an annual basis, drawing on input from the broader constituencies.</p> <p>Cameroon published annual reports covering 2021 and 2022 in September 2023. Cameroon EITI did not publish other types of annual reviews of outcomes and impact of the EITI process in the period since the previous</p>

	<p>Validation. The latest annual progress report includes an assessment of the progress in implementation of 2021-2023 work plan. The report also provides an overview of the status of follow-up on recommendations from EITI Reports and a self-assessment of progress in addressing provisions of the 2019 EITI Standard. The annexes to the annual progress report provide a review of EITI Cameroon’s finances as of 2022. While the annual progress report includes a page on outcomes and impact of the EITI process, it includes a list with a cursory review of some outcomes and impacts, such as a better understanding of the notion of conflict of interest and contribution to public debate on the Glencore affair. However, the list does not clearly articulate how the EITI led to these impacts, nor articulate any views on how the EITI’s impact could be strengthened in Cameroon. The MSG’s comments on the draft Validation report argue that the changes in Cameroon EITI’s use of ad hoc working groups was a consequence of the MSG’s better understanding of the notion of conflict of interest, which was specifically discussed at MSG meetings in June 2021 and August 2022. Explaining the context of the MSG’s use of ad hoc working groups, the comments notes that the reconstitution of working groups in August 2022 led to a reduction in MSG members participating in these working groups, substituted by technical focal points and national secretariat staff.</p> <p>Several stakeholders consulted confirmed their participation in the preparation of the progress reports, although several CSOs not directly represented on the MSG but engaged in the broader constituency on the EITI noted that they were not consulted in the preparations of the Cameroon EITI annual progress reports and did not consider that their views were reflected in the progress report. Thus, the Secretariat considers that there remain significant gaps in addressing the technical aspects of Requirement 7.4, including a lack of clear consultations with the broader constituencies, a lack of annual publication of such reviews of outcomes and impacts, and an insufficient documentation of the MSG’s self-assessment of the impact of the EITI process to date. These gaps imply that the objective is still far from being fulfilled.</p>
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New corrective actions and recommendations

- In accordance with Requirement 1.5, Cameroon should ensure that its EITI work plan is updated on an annual basis and made widely available. Cameroon’s EITI work plan should set EITI implementation objectives that are linked to the EITI Principles and reflect national priorities for the extractive industries. The EITI work plan should reflect the results of consultations with key stakeholders, including members of the broader government, industry and civil society constituencies. The EITI work plan should identify and outline plans to address any potential legal or regulatory obstacles to EITI implementation, including, if applicable, any plans to incorporate the EITI Requirements within national legislation or regulation. The EITI work plan should outline the MSG’s plans for implementing the recommendations from EITI implementation and Validation, and outline plans for disclosing contracts in accordance with Requirement 2.4 and beneficial ownership information in accordance with Requirement 2.5, including milestones and deadlines.
- In accordance with Requirement 7.1, Cameroon should ensure that EITI findings are widely accessible and distributed. Cameroon should ensure that EITI information is comprehensible,

including by ensuring that it is written in a clear, accessible style and in appropriate languages and consider access challenges and information needs of different genders and subgroups of citizens. Cameroon should ensure that EITI-related outreach events, whether organised by government, civil society or companies, are undertaken to spread awareness of and facilitate dialogue about governance of extractive resources, building on EITI disclosures across the country in a socially inclusive manner. To strengthen implementation, Cameroon is encouraged to produce brief summaries of EITI Reports, with clear and balanced analysis of the information.

- In accordance with Requirement 7.2, Cameroon should make all EITI data available in an open data format online and publicise its availability. Open data format means that data can be made accessible in CSV or Excel format and should contain all tables, charts and figures from EITI Reports. To strengthen implementation, Cameroon could work with relevant government entities and extractive companies to ensure that systematically disclosed data is machine readable and inter-operable, so that EITI disclosures and other data files are coded and tagged to make it comparable with other publicly available data.
- In accordance with Requirement 7.3, Cameroon should ensure that EITI implementation is a continuous learning process that contributes to policy-making, based on the MSG regularly considering findings and recommendations from the EITI process and acting on those recommendations it deems are priorities. Cameroon EITI should establish a robust and publicly accountable mechanism for follow-up on recommendations resulting from EITI implementation and Validation, particularly recommendations for strengthening government systems and natural resource governance.
- In accordance with Requirement 7.4, Cameroon is required to document their annual review of impact and outcomes of EITI implementation in an annual progress report or through other means agreed by the MSG. This should include any actions undertaken to address issues that the MSG has identified as priorities for EITI implementation. The annual review of impact and outcomes must include a narrative account of efforts to strengthen the impact of EITI implementation on natural resource governance, including any actions to extend the detail and scope of EITI reporting or to increase engagement with stakeholders. The annual review of impact and outcomes should also describe the rationale for the government and MSG's decisions not to implement a recommendations from EITI reporting or Validation, where such decisions have been made. All stakeholders should be able to participate in reviewing the impact of EITI implementation. Civil society groups and industry involved in the EITI, particularly, but not only, those serving on the multi-stakeholder group, should be able to provide feedback on the EITI process and have their views reflected in the annual review of impact and outcomes.

3. Stakeholder engagement

This component assesses EITI Requirements 1.1 to 1.4, which relate to the participation of constituencies and multi-stakeholder oversight throughout the EITI process.

Progress by requirement and corrective actions

The detailed assessment of progress in addressing each EITI Requirement or corrective action is available from the data collection templates referenced in annex to this report.

EITI Requirement / past corrective action and assessment	Summary of progress in addressing the EITI Requirement
<p>Government engagement (Requirement #1.1)</p> <p><i>Mostly met</i></p>	<p>The Secretariat’s assessment is that Requirement 1.1 is mostly met, which is a regression from the previous Validation. The Secretariat’s view is that the objective of full, active and effective government lead for EITI implementation at both political and operational levels has been mostly fulfilled in the period under review. Opinions of consulted stakeholders were split over whether government engagement in the EITI was full and effective. Stakeholders from government, industry and some within civil society considered that the government was fully engaged and that the lack of the MSG Chair’s participation in meetings did not have an impact because he always sent a representative to observe, and that the MSG Vice-Chair, the Minister of Mines, often chaired MSG meetings in the MSG Chair’s absence. However, other stakeholders, including from civil society, considered that government leadership of the EITI had fluctuated over the years and had not been consistently effective. Several MSG members considered that MSG decisions were not systematically implemented given weaknesses in the Cameroon EITI Secretariat’s capacities and the lack of the MSG Chair’s attendance. The MSG’s comments on the draft Validation report argue for an upgrade in the assessment of Requirement 1.1, emphasising the high degree of engagement of the various government entities that publish documents such as laws and activity reports on the extractive industries on their respective websites. References to the websites of the Ministry of Finance, MINMIDT, the national oil company SNH and the anti-corruption body CONAC are provided. The International Secretariat acknowledges the importance of these points, particularly related to the government’s commitment to the EITI and its gradual regularisation of secretariat staff and payments to vendors, yet it notes that these improvements took place in recent months and that weaknesses in the state’s engagement in all aspects of the EITI process persisted during the period under review. Sustaining the recent improvements in the government’s operational leadership of the EITI will be crucial to sustaining progress in EITI implementation.</p> <p>There have been relatively regular statements of commitment to the EITI from senior government officials since the previous Validation concluded in January 2021. This has included statements from Minister of Finance and Cameroon EITI MSG Chair Louis Paul Motaze (such as in April 2023 in meeting a mission from the International Secretariat), from the Delegated Minister to the Minister of Finance Abdoulaye Yaouba, and from the MSG Vice-Chairs. The MSG’s ‘Transparency’ template for this Validation lists the President of the Republic’s agreement to revise the EITI Decree and instructions to the Prime Minister to renew the government’s commitment to the EITI. The MSG comments on the draft Validation report highlight that the new government decree on the EITI was enacted in January 2024. It also highlights the legal reforms related to collecting beneficial ownership data (see Requirement 2.5) and the publication of mining contracts as examples of government leadership in overcoming barriers to the EITI. There was consensus among</p>

	<p>stakeholders consulted that there was high-level government commitment to the EITI and that several international commitments referenced the EITI process, including the government's commitments under the IMF programme. The MSG's comments on the draft Validation report highlight an official letter in October 2023 from the Secretary General of the Presidency to the Prime Minister directing the government to create a new budgetary line explicitly dedicated to the EITI, which the MSG notes as strong evidence of EITI engagement from the highest levels of the state. The MSG's comments also provide a letter from the Prime Minister to EITI Chair Helen Clark highlighting the government's commitment to EITI implementation.</p> <p>There has consistently been an EITI Champion to help steer the EITI process. Minister of Finance Louis Paul Motaze has acted as Cameroon EITI and MSG Chair since 2018, supported by the Delegated Minister to the Minister of Finance Abdoulaye Yaouba. In practice, while the Minister of Finance has taken steps to lead EITI implementation by issuing relevant Decrees and Orders, the operational engagement in MSG has been led by the Minister of MINMIDT and Cameroon EITI MSG Vice Chair, who was Gabriel Dodo-Ndoko until his untimely death in January 2023, replaced by Calistus Gentry. Indeed the MSG Chair has not attended any EITI meetings in the period under review.</p> <p>At the operational level, most government entities attend MSG meetings, but do not contribute or engage at the same level across government entities. There are important variations between the host Ministry of Finance and its departments and the MINMIDT on the one hand, and other government entities that are less directly responsible for oversight of the extractive industries. Government entities have broadly provided the required data for the last four (2018-2021) EITI Reports produced since the last Validation. The most active government entities in the EITI (MoF and MINMIDT representatives) participate in the few outreach and dissemination activities organised by Cameroon EITI (as documented in media cuttings collected by Cameroon EITI – see <i>Requirement 7.1</i>) but there is little evidence of government entities and officials using or promoting EITI data further beyond republishing some EITI documents. For instance, the websites of the Ministries of Finance and of MINMIDT republish the EITI Reports annually.</p> <p>While government engagement in the EITI process has been structured in hierarchical terms within each relevant government entity, there is evidence of MSG members coordinating with their broader constituency. As documented in the MSG's 'Stakeholder engagement template, government MSG members have canvassed the views of their colleagues within each relevant government entity in developing the annual work plans and annual progress reports in 2021-2022, although the level of input from the broader constituency in response to this canvassing remains unclear (see <i>Requirement 1.5</i>). Several government officials consulted explained that all EITI focal points in government entities participated in a common WhatsApp group on the EITI, in addition to using their respective government entities' WhatsApp groups to disseminate EITI information.</p>
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	<p>The government has taken some steps to overcome legal barriers to the EITI, including starting work with the MSG on revisions to the July 2018 Government Decree on EITI as early as 2021, with the new decree was finally enacted after the start of this Validation, in January 2024. The MSG established an ad hoc working group in 2021 to lead drafting of proposed revisions and the working group completed a new draft EITI decree, according to the 2021 annual progress report. There is evidence of government follow-up on some EITI recommendations, such as those related to subnational transfers. The government has taken steps to follow up on the Glencore affair, mainly in requesting the names of corrupted Cameroonian officials and threatening legal prosecution of Glencore. Government officials consulted stated that investigations into the affair were ongoing, but there is no public documentation of government efforts to investigate the national oil company and oil refinery to identify responsible individuals to date.</p> <p>The government's financial support for EITI implementation has increased significantly in the period under review, although stakeholders have reported that this support has been insufficient to cover all aspects of the EITI process beyond production of EITI Reports. Government funding for the EITI process grew in the period under review, according to the respective annual progress reports and work plans.:</p> <ul style="list-style-type: none">• XAF 146.7m (around USD 254,980) in 2020• XAF 481.4m (around USD 866,500) in 2021• XAF 317.4m (around USD 507,860) in 2022• XAF 598.7m (around USD 960,700) in 2023 <p>The MSG's comments on the draft Validation report highlight an official letter in October 2023 from the Secretary General of the Presidency to the Prime Minister directing the government to create a new budgetary line explicitly dedicated to the EITI. This increase in funding notwithstanding, there remain symptoms of dysfunctions within the government's provision of national secretariat support to its EITI MSG. Indeed, the Secretariat's understanding is that at the start of this Validation (October 2023), the contracts of national secretariat staff had still not been signed, some having worked for Cameroon EITI for as long as 12 years. The MSG's comments on the draft Validation report highlighting the signing of employment contracts for all national secretariat staff after the commencement of Validation and included copies of each employment contract. The MSG's comments also provide a copy of a January 2024 order from the Minister of Finance establishing a working group within the Ministry to oversee the regularisation of the status of all secretariat staff and the settlement of their salary arrears. Meanwhile Cameroon EITI was significantly delayed in completing payment for the 2016 and 2017 EITI Reports that were produced in February 2019 and February 2020 respectively, but for which payment was only completed in 2021 according to the 2021 annual progress report. Likewise, the Independent Administrator (IA)</p>
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	<p>for the 2020 and 2021 EITI Reports has been operating without a contract, with consequently delayed payments for its services. The Secretariat’s understanding is that there are also unpaid arrears to various vendors, such as for website maintenance. The MSG’s comments on the draft Validation report note that the IA accepted to work without a finalised contract given its confidence in the state and the need to comply with reporting deadlines, explaining that the settlement of payments to the IA follows the conventional administrative procedures. The comments also note the strict commitment to settle any outstanding payments to vendors such as the website service provider, which led to the reactivation of the Cameroon EITI website.</p> <p>Thus, while most aspects of the objective of full and effective government leadership of the EITI process have been fulfilled, there remain gaps in the government’s operational oversight of the EITI process, in the financial management of the Cameroon EITI Secretariat and the need to reinforce its technical capacities.</p>
<p>Industry engagement (Requirement #1.2)</p> <p><i>Mostly met</i></p>	<p>The Secretariat’s assessment is that Requirement 1.2 is mostly met, which is a regression from the previous Validation. The Secretariat’s view is that the objective of full, active and effective industry engagement in the EITI has been mostly fulfilled in the period under review. Most consulted stakeholders considered that extractive companies’ EITI engagement was limited to providing the required data for EITI Reports and attending MSG meetings and EITI-organised dissemination events, rather than more proactive engagement in other aspects of the EITI process, such as input to the design of the process or driving their own outreach and dissemination efforts. While company representatives consulted considered that the industry constituency’s engagement in the EITI was strong, they conceded that there was scope for improving on the timeliness and efficiency of company EITI reporting. Industry representatives considered the objectives of their EITI engagement to be primarily a compliance issue. Several government officials considered that companies should be more proactive in driving EITI outreach and communications, and not just wait for the Cameroon EITI Secretariat to take the lead. The MSG’s comments on the draft Validation report argue for an upgrade in the assessment of Requirement 1.2, noting evidence of the constituency’s input to the development of EITI documents and plans to reinvigorate the mining sub-constituency’s engagement in the EITI process. The International Secretariat takes note of these points and plans for the future, but notes that there were weaknesses in the broader industry constituency’s engagement in many aspects of the EITI process during the period under review, particularly with regards to the broader constituency’s input to key EITI documents (beyond input from MSG members) and the design and conduct of EITI outreach and dissemination.</p> <p>The industry constituency continues to structure its engagement in the EITI process according to a protocol concluded on 31 October 2018, which remains unpublished. Industry’s participation in the EITI has remained focused on participation in MSG meetings and the provision of data for EITI reporting. The key companies and organisations in the sector remain</p>

	<p>represented on the MSG as in the previous Validation, when this was assessed as fully met. In practice the industry MSG members attend or delegate attendance to a consistent proxy for all MSG meetings in the period under review. Material companies have provided the required data and quality assurances for EITI reporting in the last four reports published since the previous Validation in 2020. While systematic disclosures of EITI data by extractive companies remains highly limited in Cameroon, one oil and gas company (Gaz du Cameroun) has begun publishing its EITI disclosures on its website as of mid-2023. There is very limited evidence of companies using, promoting or disseminating EITI data, beyond GICAM’s use of EITI data during its commission meetings and debate dinners. The MSG’s comments on the draft Validation report highlight a higher engagement from extractive companies through their publication of extractive industry information. The industry constituency’s comments on the draft Validation report argue that extractive companies are engaged in transparency efforts around their own operations, but consider it the role only of the Cameroon EITI Secretariat to undertake outreach and dissemination around the EITI. Nonetheless, the constituency’s comments include extractive companies’ commitment to help drive communications efforts as part of their participation in Cameroon EITI and the MSG.</p> <p>In terms of practical methods for coordinating the constituency, the MSG’s ‘Stakeholder engagement’ template lists a communications platform established on EITI between oil and gas companies, a WhatsApp group established by the Cameroon EITI Secretariat to communicate with the broader constituency, occasional in-person meetings of the broader constituency and another WhatsApp group of industry members of the Cameroon EITI MSG. The Chamber of Commerce, Industry, Mines and Handicraft (CCIMA), which holds a seat on the MSG, maintains a WhatsApp group for over 200 of its members and staff, where it occasionally shares information on EITI developments, and publishes some information about the EITI (such as EITI Reports and key MSG decisions) on the CCIMA website. However, in practice these groups appear to have been used to disseminate information rather than facilitate a two-way conversation between industry MSG members and the broader constituency and the effective canvassing of views of the broader constituency. Indeed the ‘Stakeholder engagement’ template explains that the finalised work plans and annual progress reports have been disseminated through the Cameroon EITI Secretariat’s WhatsApp group and that feedback from the broader constituency can be sent to the Cameroon EITI Secretariat, rather than to industry MSG members. Industry representatives consulted noted that companies’ coordination on the EITI remained informal, using their existing communications channels to discuss EITI issues on an ad hoc basis. The MSG’s comments on the draft Validation report argue that there was no large operator in the mining sector during the period under review, given that the sector was dominated by artisanal and small-scale mining. The comments explain that the SOE SONAMINES will play the role of constituency coordinator for the mining sector following the example of SNH for the petroleum sector in order to strengthen the constituency’s engagement in the EITI. The MSG’s comments highlight that</p>
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	<p>the industry constituency provided input to the development of key EITI documents such as EITI work plans and annual progress reports, and that they engaged in webinars organised by the International Secretariat.</p> <p>Notwithstanding the industry constituency's own internal weaknesses in its EITI engagement, there remains an enabling legal and regulatory environment for company participation in all aspects of the EITI process.</p>
<p>Civil society engagement (Requirement #1.3)</p> <p><i>Partly met</i></p>	<p>The Secretariat's assessment is that Requirement 1.3 is partly met, which is a regression since the previous Validation. The Secretariat's view is that the objective of full, active and effective civil society engagement in the EITI process is far from being fulfilled, given weaknesses in the constituency's engagement in the EITI and challenges in its ability to use the EITI process to influence public decision-making linked to a lack of accountability in a majority of civil society's representatives on the MSG and broader MSG governance challenges (see Requirement 1.4). The Secretariat also considers that the objective of an enabling environment for civil society engagement in the EITI process and public debate on extractive industry governance is far from being fulfilled, given breaches of the EITI protocol: Participation of civil society related to freedom of expression. The MSG's comments on the draft Validation report argue for an upgrade in the assessment of Requirement 1.3, based on evidence and arguments presented by the civil society constituency. In particular, the comments argue that the constituency's engagement is demonstrated through several documents including civil society's separate comments on the draft Validation report, a letter from CSO MSG members reiterating their commitment to the EITI, a press release by the constituency's OSCC-ITIE platform, minutes of the OSCC-ITIE's 26 January 2024 meeting as well as references to the CRADEC and Transparency International Cameroon websites. The civil society comments acknowledge the Validation report's concerns related to the environment for civil society engagement and weaknesses in the constituency's organisation. However, the comments include objections to the Validation report's arguments that the constituency's broader engagement, including outreach and dissemination efforts, are driven by the minority of organisations nominated to the MSG through open and competitive procedures. The constituency's comments confirm that there have been constraints on its ability to play its full role in EITI implementation, constraints that it considers linked to the broader socio-political and legal context but categorised as factors that civil society has not been able to influence. The comments include a commitment for civil society to pursue its advocacy with government to ease constraints on civic space. With regards to the lack of a spokesperson for the OSCC-ITIE platform, weaknesses in the platform's functioning and the lack of accountability of some CSO MSG members to the broader constituency, the comments also include a commitment to resolve all of these challenges with urgency, as confirmed at the constituency's meetings on 12 and 26 January 2024, at which a spokesperson was appointed according to civil society's detailed comments. The International Secretariat welcomes these commitments to address challenges identified in this Validation with urgency. While the International Secretariat understands that lifting constraints related to civil society's ability</p>

	<p>to play its full role in the EITI process and public debate on extractive industry governance are not the sole purview of the civil society constituency and that action by authorities and the MSG will also be required, it considers that the comments received on the draft Validation report confirm the existence of constraints on freedom of expression and of operation in relation to the EITI process that have contributed to weakening civil society's ability to fulfil its EITI responsibilities, further exacerbating divisions within the constituency. While the constituency's commitment to start addressing these challenges is welcome, the Validation's assessment of the period since 2021 has highlighted challenges that should be addressed to optimise the EITI's contribution to improvements in extractive industry governance.</p> <p>Cameroon's scores in international civic space rankings have remained low in the period under review. Cameroon's ranking in the Freedom in the World has declined slightly from 18 points (out of 100) in 2020 to 15 points in 2023, albeit consistently ranked as 'not free' throughout this period. The international NGO CIVICUS has continued to rank Cameroon's civic space as 'repressed' throughout this period (since 2016). The continued security challenges in the Anglophone western regions and linked to Boko Haram in the north have provided a challenging context for civic space in those areas in particular. Civil society has developed a draft bill for the protection of human rights defenders that was submitted to the Senate in early 2022, but the status of the bill remains unclear as of October 2023.</p> <p>In terms of <u>expression</u>, there is evidence that the 2014 Law on the Repression of Terrorist Acts and the criminal defamation provisions of the 2016 Penal Code have constrained civic space more broadly in Cameroon, although not specifically on the EITI process. In practice, there have been growing attacks on journalists, including both from government and private armed groups. Several journalists investigating corruption were murdered in early 2023, although the perpetrators of these crimes remain unidentified at the time of this Validation. Many international civil society and development partner analyses of civic space in Cameroon (such as from CIVICUS, Freedom House and the US Department of State) indicate strong suspicions of self-censorship on sensitive issues related to the Presidency and the oil and gas sector in particular. Opinions of stakeholders consulted were split, with some CSOs considering that there were no constraints on their freedom of expression, while others considered that the broader civic space constraints caused CSOs to be cautious in their public statements, for fear of potential reprisals from the state. Within a broader environment for public expression and the media that remains constrained according to international civic space indicators, the Secretariat's view is that civil society substantially engaged in the EITI process have followed a pattern of caution in their public statement, with different statements made in public than in confidential bilateral conversations. In contradiction to the main body of MSG comments, the detailed civil society comments on the draft Validation report strongly oppose this statement, arguing that there are no restrictions on civil society's freedoms of expression, operation or association, citing examples of public statements on the Glencore affair by CSOs engaged in the EITI. The</p>
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	<p>Secretariat’s assessment is that civil society representatives are not able to speak freely in public about all issues covered by the EITI process, such as allegations of corruption in the mining, oil and gas sectors, without fear of reprisal from the state. This is considered a breach of the EITI protocol: Participation of civil society related to freedom of expression.</p> <p>In terms of <u>operation</u>, civil society appears able to register without excessive administrative burdens. Despite broader civic space reports’ references to delays and difficulties in registering some CSOs engaged in governance, anti-corruption and human rights, all CSOs substantially engaged in the EITI process appear duly registered. Statutory procedures requiring government approval for access to foreign funding remain unenforced, as in the previous Validation. There is evidence that CSOs engaged in the EITI are able to access foreign funding, as they have continued to do since 2021 even if there are reports of growing challenges in CSOs working on extractive issues accessing foreign funding given donors’ evolving thematic focus.</p> <p>In terms of <u>association</u>, there continue to be administrative restrictions to civil society organising public meetings and demonstrations, despite constitutional guarantees for freedom of association. The MSG’s ‘Stakeholder engagement’ template provides an inventory of events organised by civil society on issues directly related to the EITI process and linked to broader extractive industry governance issues. Most events have consisted in press conferences, public workshops and capacity building events, rather than public demonstrations or rallies. The OSCC-ITIECAM platform established in 2018 as the key channel for organising civil society’s engagement in the Cameroon EITI process continued to act as the constituency’s key coordination mechanism in the period under review. A constituency spokesperson has not yet been appointed for OSCC-ITIECAM, although opinions of CSOs consulted were split on the necessity of appointing a permanent spokesperson. Most CSOs consulted outside of the MSG did not consider that the OSCC-ITIECAM platform was operating the way it should, in part due to lack of funding from its members. The Secretariat considers that civil society is able to associate in relation to all aspects of the EITI process, given that CSOs consulted did not cite constraints on their ability to hold public events related to the EITI despite government restrictions on the holding of public events.</p> <p>In terms of <u>engagement</u>, there do not appear to be any statutory government constraints on civil society’s ability to engage in the EITI process since the previous Validation. Civil society representatives regularly and consistently attend MSG meetings and conduct some analysis of EITI Reports. However, active engagement in MSG discussions, outreach and dissemination appears to be driven by organisations that have been nominated by their broader constituency to represent them in the EITI process, rather than organisations that have been statutory named in the EITI Decree to represent their specific organisations in the EITI process. The civil society detailed comments on the report highlight that PWYP Cameroon conducted EITI outreach and dissemination activities during this period. Only two of the eight MSG seats reserved for the civil society constituency are earmarked for members to be</p>
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	<p>appointed by their broader constituency, namely two CSOs working on extractive industry governance and a representative of the Cameroonian PWYP coalition. The Secretariat understands that several current MSG members from civil society (named by the EITI Decree) currently work for (or have recently retired from) government. While there were different views among different CSOs consulted over whether such government employment constituted a conflict of interest, the Secretariat considers this a concern given that the vast majority of the constituency’s engagement in the EITI process appears driven by the minority of CSOs that have been appointed to the MSG by the broader civil society constituency, rather than representatives of organisations statutorily appointed to the MSG that have in many cases not changed for over ten years. The civil society detailed comments argue strongly that there should be a distinction between individuals and organisations represented on the MSG, noting that there had been rotation in PWYP Cameroon’s Technical Secretary but that the representative had consistently been engaged in EITI outreach and dissemination. The MSG’s comments highlight that the new government decree on the EITI was enacted in January 2024 and expanded the number of civil society MSG seats from eight to 12, opening up all seats to open, competitive nominations.</p> <p>In terms of <u>access to decision-making</u>, there do not appear to be any statutory barriers to civil society using the EITI process to discuss extractive industry issues of relevance for public debate and public policy making. In practice, it appears that CSOs – particularly those nominated in an open, fair and transparent manner to represent the constituency on the MSG – are able to add to the agenda of Cameroon EITI MSG meetings and to use the EITI process to follow up on issues of priority for their constituency. However, several CSOs consulted considered that there were weaknesses in the MSG’s capacities to effectively oversee the EITI process given capacity constraints within the Cameroon EITI Secretariat and the lack of attendance at MSG meetings by the MSG Chair. While consulted civil society representatives’ views were split over this issue, some CSOs considered that MSG decisions were not always implemented given the Cameroon EITI Secretariat’s staffing challenges and the fact that the MSG Chair and Minister of Finance did not always implement the MSG’s decisions. The Secretariat considers that civil society’s ability to use the EITI process to access public decision making remains only partial given weaknesses in the accountability of a majority of MSG members representing the constituency and broader weaknesses in the MSG’s governance.</p>
<p>Multi-stakeholder group (Requirement #1.4)</p> <p><i>Partly met</i></p>	<p>The Secretariat’s assessment is that Requirement 1.4 is partly met, as in the previous Validation. The Secretariat’s view is that the objective of an independent MSG with active and meaningful oversight of all aspects of EITI implementation is not fulfilled in the period under review. Most consulted stakeholders from all constituencies conceded that there had been challenges to the MSG’s operations in the period under review, but most stakeholders considered that the objective of MSG oversight was now in the process of being fulfilled. In particular, industry and government representatives considered that there had been a net improvement in the</p>

	<p>MSG’s oversight since the challenges of early 2021 when Cameroon was suspended due to delays in its EITI reporting. However, many CSOs consulted considered that there were challenges in the MSG’s functioning, although opinions within the constituency were split over the nature of the challenges and over whether they were in the process of being addressed. Some partners consulted considered that it was the status quo since the previous Validation in terms of the MSG governance and oversight of the EITI process. The MSG’s comments on the draft Validation report argue for an upgrade in the assessment of Requirement 1.4, given the regularisation of secretariat staff contracts, statutory provisions for greater coordination and engagement of the constituencies in the EITI process, provisions related to gender balance in MSG representation and plans for greater constituency involvement in outreach and dissemination. The International Secretariat acknowledges these important points, but considers that weaknesses in the constituency’s representation and engagement in the EITI process during the period under review, combined with weaknesses in MSG oversight, imply that the objective of balanced multi-stakeholder oversight of the EITI was still far from being achieved in recent years.</p> <p>With regards to constituency <u>representation</u> in the EITI process, the MSG has not comprehensively renewed its membership since the last renewal in August 2018. While the MSG members’ terms is set at three years renewable once in the 2018 EITI Decree, the MSG’s composition has not been renewed since the previous Validation given that the Ministry of Finance decision confirming the composition of the MSG was only issued in February 2020, thereby only requiring a renewal of MSG membership in 2023. There is no indication that the procedures for renewing the MSG’s membership had started as of the commencement of this Validation (in October 2023). There have been ad hoc renewals of MSG members following the replacements of specific individuals within their respective organisations, including five MSG members from government and two from industry. As noted in the previous Validation, while government followed its hierarchical procedures for appointing its members to the MSG, there is no procedure in place to ensure that the majority of industry and civil society MSG members are appointed by their broader constituencies in open, free and fair nominations procedures. There were five replacements of government MSG members in this period. The MSG Chair did not attend any of the 43 MSG meetings in this period, and only seven of the 16 MSG members from government, parliament and local government attended a majority of MSG meetings since January 2021. The new EITI decree enacted in January 2024 integrates the Ministry of Environment and the new mining SOE SONAMINES into the MSG.</p> <p>Of the eight MSG seats reserved for industry, there is only evidence of a codified procedure for appointing the four oil and gas company representatives, while the EITI Decree reserves two seats for the industry associations (CCIMA and GICAM) and one seat each for companies in the oil transportation and mining sectors respectively. There continues to be no indication that a codified procedure exists for a competitive appointment of the mining company representative. Company representatives consulted</p>
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	<p>confirmed that the national oil company SNH has continued to play the role of sub-constituency coordinator for the oil and gas sector, despite being listed as part of the government constituency in all public Cameroon EITI documents including the MSG’s ‘Stakeholder engagement’ template. The MSG’s comments on the draft Validation report confirm that SNH continued to play the role of oil and gas industry constituency coordinator during the period under review, in accordance with the sub-constituency’s protocol for coordination. Industry consultations indicated that oil and gas companies expect SNH to take the lead on substantive discussions regarding broader sector reforms, with illustrative examples provided such as the MSG’s work on disclosure of production-sharing contracts. Consulted company representatives considered their role on the MSG to be limited to compliance with Cameroon EITI rules related to attendance at MSG meetings and the provision of required data for EITI reporting, but not to proactive leadership in the design of the EITI process or in EITI-related outreach and dissemination (see <i>Requirement 1.2</i>). The MSG’s comments on the draft Validation report highlight provisions in the Cameroon EITI national communications strategy for each constituency to actively engage in outreach and dissemination, going beyond the provision of data for EITI reporting. The list of industry MSG members is provided in the ‘Stakeholder engagement’ template, including the replacements of the MSG members from Addax and GICAM in December 2021 and April 2023 respectively. Only half of the eight industry MSG members participated in a majority of the 43 MSG meetings held in the period under review, with MSG members from Perenco, Noble Energy, the Mining Federation of Cameroon and GICAM attending only a smaller number of meetings.</p> <p>Of the eight MSG seats reserved for civil society, a minority of only two seats (currently held by CRADEC and AGNR) are open for competitive appointments based on an open, free and fair nominations procedure facilitated by the OSCC-ITIECAM platform. The other six seats are reserved for representatives of organisations named in the EITI Decree, namely PWYP Cameroon, Transparency International Cameroon (TI-C), the Union of Journalists of Cameroon, and the three religious communities’ organisations. While PWYP Cameroon and TI-C are organisations that undertake some work on extractive industry governance, the relevance to the EITI process of activities of the other four organisations named in the EITI Decree is less clear. The MSG’s comments on the draft Validation report explain that the inclusion of religious organisations in the scope of the civil society constituency represented in the EITI is relevant in relation to communities hosting extractive activities, given the religious organisations’ reach in the country. The MSG’s comments also highlight the enactment of the new EITI decree in January 2024, which opened up all civil society MSG seats to open nominations and expanded their number from eight to 12. None of the CSO MSG members have been replaced since the previous Validation, while representatives of the three religious organisations appear to have been members of the MSG for over ten years. While all eight CSO MSG members attended a majority of MSG meetings in this period, a review of meeting minutes indicates that the most active MSG members from the constituency are those that have been appointed through</p>
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	<p>a competitive process, as well as representatives from PWYP Cameroon and TI-C. In addition, it appears that at least two of the MSG members from religious organisations either currently work for (or have recently retired from) government employment.</p> <p>In terms of gender representation, a minority of only four of the 32 MSG members are women, including two each from the government and industry constituencies (and none from civil society). In preparation of the draft Validation report, there did not appear to be provisions for the consideration of gender in appointments to the MSG by either of the three constituencies' nominations procedures and practices. However, the MSG's comments on the draft Validation report noted that the civil society MoU for the participation of CSOs in the EITI process includes provisions for the consideration of gender aspects in the appointment of MSG members. Civil society representatives consulted noted that there was one woman civil society member of the Technical Secretariat of EITI focal points, which was confirmed in the MSG's comments on the draft Validation report, but many CSOs expressed frustration at the low number of women representatives on the MSG.</p> <p>With regards to the MSG's <u>oversight of the EITI process</u>, the general indicators of healthy MSG oversight were not positive in Cameroon during the period under review. Three months after Cameroon's last Validation, it was suspended for missing its (extended) deadline for the 2018 EITI Report. The staff and vendors (e.g. website service provider) have continued to work without permanent contract (some for as long as 12 years) and with arrears in payment. The IA for the 2020 and 2021 EITI Reports have worked without a formal contract, with arrears in payment that have caused delays in reporting. The MSG has developed a draft new Decree governing the EITI, with significant input from civil society, the draft was still under review by the Minister of Finance as of the commencement of this Validation (October 2023). Thus, the Cameroon EITI MSG continued to operate under the 2018 Decree (2018/6026/PM) governing the EITI, which was assessed in the previous Validation and had not yet been updated for the 2019 EITI Standard.</p> <p>Following Cameroon's suspension by the EITI in April 2021 due to the missed 2018 EITI Report deadline and the prolonged absence of key secretariat staff, the MSG chair and deputy chair established a "Provisional Administrative Management Unit" (UGAP) the same month in order to expedite production of the delayed EITI Report. Following publication of the EITI Report in June 2021, the unit was renamed "Priority Actions Management Unit" (UGAP). This unit essentially replaced key secretariat staff during their prolonged absence in 2021, steering the National Secretariat and MSG's work. The MSG also established an ad hoc working groups starting in the second quarter of 2021 to oversee production of the 2018 and 2019 EITI Reports. The MSG's comments on the draft Validation report clarified that the temporary working groups to oversee production of the EITI Reports were disbanded when the UGAP was established in April 2021. Meanwhile the Technical Secretariat, which convened EITI focal points in government agencies, industry and civil society, appears to have continued some work informally, although it is</p>
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	<p>unclear whether the previous practice of paying per diems for Technical Secretariat meetings continues.</p> <p>The MSG successfully navigated the mobility restrictions linked to the COVID-19 pandemic by holding online and hybrid meetings in 2021-2022. There are discrepancies between the number of MSG meetings listed in the MSG’s Stakeholder engagement template² and successive annual progress reports and minutes of meetings available online.³ The higher frequency of MSG meetings in 2021 was due to the prolonged absence of key secretariat staff at a time of Cameroon’s suspension for delays in publishing its 2018 EITI Report. Civil society attendance is stronger in civil society, with all members attending regularly, than in industry or government, where only around half of MSG members participate regularly. The MSG includes anglophone members of all three constituencies, but makes little accommodation for their interventions given the lack of translation of basic documents or the substance of MSG discussions into English. There is a significant divide between anglophone and francophone MSG members that Cameroon EITI appears to have done little to alleviate. Nonetheless, decision-making appears to have continued to be consensual, if formal. All MSG members confirmed the consensual nature of MSG decisions in consultations. Documents appear to be largely circulated with sufficient advance notice, despite capacity constraints of the national secretariat. Minutes of MSG meetings are published on the Cameroon EITI website.</p> <p>There remain significant concerns, including from some stakeholders consulted off the MSG, over conflicts of interest on the MSG, in several respects. The long-standing issue of per diems has been clarified in terms of the rules and the practices, but the practices have not changed. The same people have been members of the MSG for over ten years. The other potential conflict of interest is the fact that several of the MSG members from the civil society constituency, namely the representatives from the Islamic Cultural Association and the Protestant Churches Council, appear to be employed by government (the Ministry of Finance and the Prime Minister’s Office respectively). These MSG members appear less active in discussions, based on MSG meeting minutes, and appear to not effectively represent the broader civil society constituency (see <i>Requirement 1.3</i>).</p> <p>A significant capacity constraint for the MSG lies in its support from a properly capacitated Cameroon EITI Secretariat. There was consensus among stakeholders consulted that the Cameroon EITI Secretariat did not have sufficient technical resources. Although four of the secretariat’s seven staff did not receive their “advances on salaries” in the period 2019-2020, Cameroon EITI’s 2021 annual progress report explains that these arrears in salary advances were paid in 2021. However, the contractual status of the permanent secretariat’s staff had not been regularised as of October 2023,</p>
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² According to the MSG’s ‘Stakeholder engagement’ template, there were 17 meetings of the MSG in 2021, 12 in 2022 and 14 in January–September 2023

³ According to successive annual progress reports and minutes of meetings, the MSG met 17 times in 2021, six times in 2022 and four times in the first nine months of 2023.

	<p>with only gradual steps taken to address the irregularities. In 2021, the annual progress report explains that secretariat staff were provided with certificates of employment confirming each employee's start date and attestations of their effective presence in their employment positions. The UGAP developed draft statutes and employment contracts for secretariat staff and a draft set of internal guidelines (<i>règlement interieur</i>) that were submitted to the Minister of Finance in 2021, although these were not enacted as of October 2023 even though the 2021 annual progress report states that the regularisation of the secretariat's staff employment was close to finalisation. Many stakeholders consulted from all constituencies highlighted the main revision in the draft new EITI Decree was a more capable and efficient structure for the permanent secretariat, alongside more institutionalisation of government budget support for the EITI. The MSG's comments on the draft Validation report highlighted the recent signature of all Cameroon EITI secretariat staff contracts (and provided copies of each contract) and the establishment of a working group within the Ministry of Finance to oversee the regularisation of staff contracts and settlement of salary arrears. Yet the International Secretariat considers that this reflects a dysfunction in the MSG's oversight of a key aspect of the EITI process, particularly a properly operated and capacitated national secretariat.</p>
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New corrective actions and recommendations

- In accordance with Requirement 1.1, Cameroon should ensure that the government is fully, actively and effectively engaged in all aspects of the EITI process at the operational level, including in the mobilisation of sufficient technical and financial resources for all aspects of EITI implementation including outreach and dissemination, taking steps to overcome barriers to the EITI process such as in the area of contract and beneficial ownership transparency, and exercising practical oversight of the Cameroon EITI Secretariat to ensure that provides the required support to the MSG. To strengthen implementation, Cameroon is encouraged to enact implementing regulations to its own national laws that translate key EITI Requirements into national legislation, such as the 2018 Code of Transparency and Good Governance in the Management of Public Finances in Cameroon and the 2016 Mining Code, as a means of institutionalising the EITI in government systems.
- In accordance with Requirement 1.2, Cameroon should ensure that companies are fully, actively and effectively engaged in all aspects of the EITI process, including input to the design of EITI implementation and active contributions to EITI-related outreach and dissemination. To strengthen implementation, extractive companies are urged to codify robust constituency coordination procedures to provide genuine channels for consultation and representation within the EITI process of the views of the broader industry constituency.
- In accordance with Requirement 1.3, Cameroon should ensure that the civil society constituency, not limited to those directly represented on the MSG, are fully, actively and effectively engaged in all aspects of the EITI process. All constituencies in Cameroon, particularly the government, should ensure that there are no obstacles to civil society participation in the EITI process or in public debate on extractive industry governance. The government should undertake measures to prevent civil society actors from being harassed, intimidated, or persecuted for expressing views related to oil, gas or mining governance. In the event that civil

society actors engaged in the EITI experience threats or harassment for expressing views about the extractive industries or engaging in other EITI-related activities, the government is expected to undertake measures to protect these actors and their freedom of expression. The government, in collaboration with the MSG, is encouraged to consider practical solutions for ensuring that civil society can engage in the EITI freely in all regions of the country. The MSG is encouraged to regularly monitor developments regarding civil society's ability to engage in the EITI. In accordance with the EITI protocol: Participation of civil society, civil society MSG members are encouraged to bring any ad hoc restrictions that could constitute a breach of the protocol to the attention of the MSG. The government, in collaboration with the MSG, should document the measures it undertakes to remove any obstacles to civil society participation in the EITI.

- In accordance with Requirement 1.4, Cameroon should ensure that stakeholders are adequately represented in the multistakeholder oversight of the EITI process. This does not mean that they need to be equally represented numerically. The multi-stakeholder group must comprise appropriate stakeholders. Each stakeholder group must have the right to appoint its own representatives, bearing in mind the desirability of pluralistic and diverse representation. The nomination process must be independent and free from any suggestion of coercion. Cameroon should ensure that the invitation to participate in the group is open and transparent. The multi-stakeholder group and each constituency should consider gender balance in their representation to progress towards gender parity.

Cameroon is encouraged to pursue its efforts to update the Decree governing the EITI, which should include provisions of the 2023 EITI Standard. Members of the multi-stakeholder group should have the capacity to carry out their duties. The multi-stakeholder group should undertake effective outreach activities with civil society groups and companies, including through communication such as media, website and letters, informing stakeholders of the government's commitment to implement the EITI, and the central role of companies and civil society. The multi-stakeholder group should also widely disseminate the public information that results from the EITI process. Members of the multi-stakeholder group should liaise with their constituency groups. Members of the multi-stakeholder group are expected to abide by the EITI Association code of conduct. Cameroon should ensure that its practice of per diems for attending EITI meetings, or other payments for instance for the Technical Secretariat, is transparent and does not create conflicts of interest.

4. Transparency

This component assesses EITI Requirements 2 to 6, which are the requirements of the EITI Standard related to disclosure.

Overview of the extractive sector (Requirements 3.1, 6.3)

Overview of progress in the module

Amidst limited updates to disclosures on government and company websites about extractives operations in Cameroon, EITI reporting has remained the primary source of comprehensive information on the extractive industries, including significant ongoing exploration activities. The National Statistics Institute (INS) publishes annual reports with some information on the extractive industries' contribution to GDP, but not to other aspects of the national economy such as government revenues, exports, or employment. There is an opportunity with the ongoing reform of the single Treasury account and the planned tagging of extractive revenues to strengthen systematic Ministry of Finance (and particularly the Budget Department) disclosures of information on the extractive industries' contribution to government revenues. There is scope for Cameroon EITI to play more of a coordinating role in capitalising on such opportunities to embed systematic disclosure of EITI data at the core of government reforms related to extractive industry governance and public finance management. There are also opportunities to strengthen Cameroon use of the EITI as a data collection and disclosure instrument where the government does not possess granular data, for instance on private company employment in the mining and petroleum sectors broken down by company, gender and occupation level.

Progress by requirement and corrective actions

The detailed assessment of progress in addressing each EITI Requirement or corrective action is available from the data collection templates referenced in annex to this report.

EITI Requirement / past corrective action and assessment	Summary of progress in addressing the EITI Requirement
<p>Exploration (Requirement #3.1)</p> <p><i>Fully met</i></p>	<p>The Secretariat's assessment is that Requirement 3.1 is fully met, as in the previous Validation. The Secretariat's view is that the objective of ensure public access to an overview of the extractive sector and its potential is fulfilled, given Cameroon's use of its EITI reporting to provide an overview of the extractive industries on an annual basis, with some information on significant exploration activities. Consulted stakeholders did not express particular views on progress towards this objective.</p> <p>There are few systematic disclosures of information on the mining, oil and gas sectors, either on the MINMIDT or SNH websites. Cameroon's 2021 EITI Report provides an overview of these sectors, including of the artisanal and</p>

	<p>semi-mechanised mining sectors as well as significant exploration activities in the year under review. Given that most of this information is not yet systematically disclosed, the assessment of Requirement 3.1 is not yet 'exceeded'.</p>
<p>Contribution of the extractive sector to the economy (Requirement #6.3)</p> <p><i>Mostly met</i></p>	<p>The Secretariat's assessment is that Requirement 6.3 is mostly met, which represents a regression since the previous Validation. The Secretariat's view is that the objective of ensuring a public understanding of the extractive industries' contribution to the national economy is mostly fulfilled, given Cameroon's use of its EITI reporting to disclose comprehensive information on the macro-economic contribution of the extractive industries, including estimates of informal extractive activities, but the lack of attempt to disaggregate employment data by gender, company and occupation. Consulted stakeholders did not express particular views on progress towards the objective.</p> <p>There are limited systematic disclosures of information on the extractive industries' contribution to the national economy. The sole form of disclosures consist of the National Statistics Institute's (INS) annual report on national accounts, published on its website, which provides in absolute and relative terms the extractive industries' contribution to GDP. Since September 2023, the INS website has also started republishing data from Cameroon EITI Reports in open format on the extractive industries' contribution to the national economy, although this remains a means of improving the accessibility of Cameroon EITI data from PDF-format reports rather than a form of systematic disclosures.</p> <p>Cameroon's 2021 EITI Report provides the extractive industries' contribution, in absolute and relative terms, to GDP, government revenues, exports and employment, including estimates of the value of informal extractive activities (namely artisanal and semi-mechanised mining). An overview of the location of main extractive activities is also provided. The EITI Report provides extractive employment data only disaggregated between mining and petroleum, but not by company, occupation level or gender. Although the Secretariat's understanding is that this more granular employment data is not currently collected by government entities, it considers that Cameroon EITI could have contributed to collecting such data from companies included in the scope of EITI reporting.</p>
<p>New corrective actions and recommendations</p>	
<ul style="list-style-type: none"> • To strengthen implementation of Requirement 3.1, Cameroon is encouraged to work with relevant government entities including the MINMIDT, SNH and the INS to strengthen their systematic disclosures of information on the extractive industries, including significant exploration activities. • In accordance with Requirement 6.3, Cameroon should ensure public disclosure of the extractive industries' contribution to national employment disaggregated by company, occupation and gender. Where this is not already available, Cameroon should at least use its 	

EITI reporting to disclose such data for material companies included in the scope of reporting. Cameroon is encouraged to work with relevant government entities including the Ministry of Finance (particularly Treasury and the Budget Department), the MINMIDT, SNH and the INS to strengthen their systematic disclosures of information on the extractive industries' contributions to GDP, government revenues, exports and employment, disaggregated by gender and occupation level.

Legal environment and fiscal regime (Requirements 2.1, 2.4, 6.4)

Overview of progress in the module

Cameroon has developed some systematic disclosures of laws, regulations and general descriptions of the fiscal regime, but EITI reporting continues to play a key role in centralising and complementing those disclosures. While Cameroon has used its EITI reporting to comprehensively describe the top-level legal and regulatory framework, the detail fiscal terms at a project level in the oil and gas sector remain opaque, in the absence of contract disclosure in the oil and gas sector. Cameroon has made significantly more progress on contract disclosure in the mining sector, publishing the six active mining contracts (albeit with some missing annexes) but not yet the full text of mining exploration licenses. The publication of the SINOSTEEL contract in 2022 garnered significant public attention and advocacy from civil society, such as in this September 2022 [article](#) by the Tax Justice Network. The robust public debate led to the Minister of MINMIDT presenting the contract terms to Parliament (see *Requirement 7.1*). In more recent EITI Reports, Cameroon has expanded its coverage of the rules related to environmental impact management and monitoring, although it has yet to start using its EITI reporting as a diagnostic of the rules and practices of environmental impact management.

Progress by requirement and corrective actions

The detailed assessment of progress in addressing each EITI Requirement or corrective action is available from the data collection templates referenced in the annex to this report.

EITI Requirement / past corrective action and assessment	Summary of progress in addressing the EITI Requirement
Legal framework and fiscal regime (Requirement #2.1) <i>Fully met</i>	The Secretariat's assessment is that Requirement 2.1 is fully met, as in the previous Validation. The Secretariat's view is that the objective of ensuring public understanding of all aspects of the regulatory framework for the extractive industries is fulfilled, but not yet exceeded pending the systematic disclosure of information on the legal framework and fiscal regime, including significant ongoing and planned reforms, on relevant government websites.

	<p>Consulted stakeholders did not express particular views about progress towards this objective.</p> <p>In <u>oil and gas</u>, the national oil company SNH's website provides the full text of applicable laws and regulations in the sector (as well as the model production-sharing contract), in the absence of a Ministry of Petroleum in Cameroon. The 2021 EITI Report provides a more extensive overview of applicable laws and regulations, the roles and responsibilities of key government entities, the general fiscal regime and an outline of the main fiscal terms of oil and gas contracts, and the level of fiscal devolution related to oil and gas revenues. The report's overview of recent reforms is restricted to a description of the implementing decree for the 2019 Petroleum Code. While there is scope for expanding the overview of ongoing and planned reforms, such as the impact of the CEMAC's new foreign exchange regime on oil and gas contracts, Cameroon EITI's 2021 annual progress report briefly describes this reform.</p> <p>In <u>mining</u>, the Ministry of Mines, Industry and Technological Development website systematically discloses some of the key laws and regulations related to the mining sector, alongside the full text of six active mining contracts. Cameroon's 2021 EITI Report provides a more extensive overview of the applicable laws and regulations in the mining and quarrying sector, the fiscal regime, the key roles and responsibilities of state entities with oversight on mining and quarrying, as well as the level of fiscal devolution and subnational transfers of mining revenues. While the report's overview of reforms in the mining and quarrying sector is cursory – covering only government reforms to collect more revenues from quarrying and the nomination of the members of the new mining SOE's board of directors, the Secretariat considers that, on balance, there is a sufficient overview of mining and quarrying reforms.</p>
<p>Contracts (Requirement #2.4)</p> <p><i>Partly met</i></p>	<p>The Secretariat's assessment is that Requirement 2.4 is partly met. The Secretariat's view is that the objective of ensuring the public accessibility of all licenses and contracts underpinning extractive activities is not fulfilled, given the lack of a clear government policy on the public disclosure of extractive contracts, the lack of publication of all mining, oil and gas contracts and licenses awarded and amended since January 2021, and the lack of a comprehensive inventory of all active extractive licenses and contracts (covering annexes, amendments and riders), identifying licenses and contracts not yet published. Most consulted stakeholders focused on the recent publication of mining contracts to argue that the objective was in the process of being fulfilled, although some CSOs raised concerns over the unclear path forward for the disclosure of oil and gas contracts. Many civil society stakeholders considered that there had been significant progress on contract disclosure, a priority for civil society (see <i>Requirement 1.3</i>). Several international partners highlighted the importance of oil and gas contract disclosure and noted the opportunity of a number of active contracts nearing expiry as an opportunity to remove confidentiality clauses in future production-sharing contracts (PSCs).</p>

	<p>While the 2018 Transparency Code provides a general framework for the public disclosure of extractive contracts and licenses, the 2021 EITI Report argues that the government’s policy regarding publication of extractive contracts remains unclear pending the issuance of an implementing decree for the Transparency Code. This statement was contested in stakeholder consultations, with most stakeholders consulted considering that the government’s policy was clear given the 2018 Transparency Code. The EITI Report also clarifies that confidentiality provisions of oil and gas contracts hinder their public disclosure (albeit without describing what these contractual confidentiality provisions cover – i.e. whether they cover the full text of the whole contracts or only specific terms – and only explains that SNH has undertaken extensive internal consultations on the issue of oil and gas contract disclosure, with the outcomes of these internal deliberations to be made public “in due course”. State officials reiterated that SNH had undertaken extensive internal reflexions and that it was expected to issue a statement in the coming months. While Cameroon EITI’s 2021 annual progress report briefly notes the December 2021 regional (CEMAC) directive requiring oil and gas companies to repatriate their rehabilitation provisioning to Cameroon from offshore, which has led to the renegotiation of oil and gas contracts in other countries and the removal of confidentiality provisions therein, the 2021 EITI Report does not discuss this reform nor its potential implications for the need for renegotiation or amendment of oil and gas contracts in Cameroon.</p> <p>In practice, the government has only publicly disclosed the full text of six mining contracts and seven mining licenses, including two mining contracts (with SINOSTEEL and CIMENCAM) that were awarded after January 2021. However, the annexes of some of these contracts (e.g. CIMENCAM’s contract) do not appear to have yet been publicly disclosed, even if the Secretariat understands that the CIMENCAM contract is no longer active. There was consensus among all stakeholders consulted that all active mining contracts had been published. The publication of the SINOSTEEL contract in particular prompted significant public debate and for the Minister of MINMIDT to present the terms of the contract to Parliament (see <i>Requirement 7.1</i>). However, given that at least 27 mining licenses were awarded in 2021 alone (as confirmed in the EITI Report), the Secretariat concludes that there are gaps in the public disclosure of mining licenses awarded since January 2021.</p> <p>None of the oil and gas licenses or contracts have yet been publicly disclosed by the government or companies. The SNH website has only published the template production sharing contract and a list of 3 concessions and 20 PSCs awarded up to July 2017 (there are currently 26 active oil and gas contracts as listed on the MINMIDT webpage for the petroleum register). Industry stakeholders consulted highlighted stabilisation clauses in their contracts that tended to be over ten years old and awarded under the 1999 Petroleum Code. Companies noted that all government agencies had access to the full text of the PSCs, just not the public, and that SNH was an effective negotiator to represent the country’s interests.</p>
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	<p>While the government has published four mining contracts and licenses awarded prior to 2021, there remain a large number of extractive licenses and contracts awarded prior to 2021 that have not yet been published, as encouraged under Requirement 2.4.a. Cameroon EITI has not yet published a comprehensive list of all active mining, oil and gas licenses and contracts (covering annexes, amendments and riders) in accordance with Requirement 2.4.c.ii, indicating which contractual and license documents have been published and which have not, with specific references (hyperlinks) to facilitate access to each published document and identifying those documents yet to be published.</p>
<p>Environmental impact (Requirement #6.4)</p> <p><i>Not assessed</i></p>	<p>The Secretariat's assessment is that Requirement 6.4 remains not assessed, given that several encouraged aspects of this requirement remain to be addressed by Cameroon EITI. The Secretariat's view is that the objective of providing a basis for stakeholders to assess the adequacy of the regulatory framework and monitoring efforts to manage the environmental impact of extractive industries is not fulfilled, given the scope for strengthening disclosures by Cameroon EITI or relevant government entities on practices related to environmental impact management as well as other environmental monitoring procedures, administrative and sanctioning processes of governments, as well as environmental liabilities. Consulted stakeholders from both government and civil society highlighted environmental impacts of mining as an issue of particular concern where they wanted the EITI to do more work on.</p> <p>Cameroon EITI significantly expanded its coverage of the management and monitoring of the environmental impact of the extractive industries in its 2021 EITI Report. The EITI Report provides an overview of the legal and regulatory framework for managing environmental impacts in both mining and petroleum, a cursory description of administrative procedures and an overview of practices related to oil and gas companies' contributions to environmental rehabilitation. The PASIE⁴ project published a study in August 2020 on adherence to environmental standards in the mining sector in Cameroon, although this report does not appear to have informed Cameroon EITI's work despite the fact it was produced partly by EITI staff. There is scope for significantly expanding Cameroon's use of its EITI reporting to provide a diagnostic of rules and practices related to environmental management, including expanding its overview of practices beyond provisions for environmental rehabilitation and strengthening its disclosures of practices related to environmental monitoring, administrative and sanctioning processes, as well as managing environmental liabilities.</p>
<p>New corrective actions and recommendations</p>	
<ul style="list-style-type: none"> • To strengthen implementation of Requirement 2.1, Cameroon is encouraged to work with relevant government entities to strengthen systematic disclosures of information about the legal 	

⁴ *Projet d'Amélioration de la Surveillance des Industries Extractives en Afrique Subsaharienne (PASIE).*

framework and fiscal regime in the mining and petroleum sectors, including significant ongoing or planned reforms.

- In accordance with Requirement 2.4, Cameroon is required to disclose any contracts and licenses that are granted, entered into or amended from 1 January 2021. Cameroon is encouraged to publicly disclose any contracts and licenses that provide the terms attached to the exploitation of oil, gas and minerals. The government is required to formalise and operationalise its contract disclosure policy. The MSG is expected to agree and publish a plan for disclosing contracts with a clear time frame for implementation addressing any barriers to comprehensive disclosure. Cameroon should ensure public disclosure of an overview of which contracts and licenses are publicly available, indicating which are publicly available and which are not, and providing a specific reference (hyperlink) to each published contractual and license document (including annexes, amendments and riders). Where disclosure practice deviates from legislative or government policy requirements concerning the disclosure of contracts and licenses, Cameroon should publish an explanation for the deviation.
- To strengthen implementation of Requirement 6.4, Cameroon could consider expanding its use of EITI disclosures to document the rules and practices related to environmental impact management and monitoring. This could include information on environmental impact assessments, certification schemes, licences and rights granted to oil, gas and mining companies, as well as information on the roles and responsibilities of relevant government agencies in implementing the rules and regulations. It could further include information on any reforms that are planned or underway. Cameroon EITI disclosures could also cover regular environmental monitoring procedures, administrative and sanctioning processes of governments, as well as environmental liabilities, environmental rehabilitation and remediation programmes.

Licenses and property rights (Requirements 2.2, 2.3)

Overview of progress in the module

Cameroon has strengthened its use of the EITI as an annual diagnostic of licensing practices since the last Validation. The 2020 EITI Report introduced a more detailed and methodologically robust approach to identifying non-trivial deviations in license award and transfer processes. The 2021 EITI Report presents both the outcome of the detailed diagnostic, which identified deviations, and a letter from the MINMIDT providing assurances that licensing procedures were strictly followed. There is an opportunity in the MINMIDT's ongoing digitisation efforts to significantly strengthen the cadastral department's systematic disclosures of information on licensing in the mining sector and to facilitate public oversight of sufficient information on licensing practices to democratise the diagnostic of licensing practices. There was no licensing activity in the oil and gas sector in 2021 to review, although there is an opportunity for Cameroon EITI to broaden its diagnostic of licensing practices in the oil and gas sector to historical licensing practices (in previous years) and to license renewals.

Cameroon’s MINMIDT maintains a modern online cadastral portal for its mining sector that provides all information required by the EITI Standard, aside from dates of application for a handful of older mining licenses due to archiving problems. The Secretariat considers this a marginal weakness. Since the last Validation the MINMIDT has also strengthened its systematic disclosures by publishing a list of the 26 active oil and gas blocks, providing all of the required information aside from dates of application and of award for some of the older licenses. While this could be seen as a marginal gap, the lack of coordinates for three of the 26 active oil and gas licenses is a greater concern. There are opportunities for the MINMIDT to improve the accessibility of oil and gas cadastral information, potentially through a cost-efficient map-based data visualisation tool.

Progress by requirement and corrective actions

The detailed assessment of progress in addressing each EITI Requirement or corrective action is available from the data collection templates referenced in the annex to this report.

EITI Requirement / past corrective action and assessment	Summary of progress in addressing the EITI Requirement
<p>Contract and license allocations (Requirement #2.2)</p> <p><i>Mostly met</i></p>	<p>The Secretariat’s assessment is that Requirement 2.2 is mostly met, as in the previous Validation. The Secretariat’s view is that the objective of providing a public overview of the rules and practices of oil, gas and mining license awards and transfers is mostly fulfilled. Most consulted stakeholders did not express particular views on progress towards the objective.</p> <p>In <u>oil and gas</u>, there are no systematic disclosures on the licensing process by state entities or SNH. The 2021 EITI Report confirms the lack of awards or transfers of oil and gas rights in 2021 and lists three licenses that reached expiry in 2021. The report describes the statutory procedure for awarding oil and gas rights and transferring participating interests therein, confirming that all licenses are associated to contracts. However, the report only provides a list of documents required of applicants to demonstrate their technical and financial capacities, but does not describe how these documents are assessed (i.e. according to which criteria) aside from noting that no weighting is applied to the different documents. In consultations, the IA explained that there was no administrative procedure that described the criteria beyond the list of documents provided in the EITI Report, but the IA confirmed that no weighting was applied to the different documents as all had to be provided. The report includes a description of the expiry date of three oil and gas licenses in 2021 and their subsequent extension in 2023, but without providing an assessment of non-trivial deviations from statutory procedures in these license extensions (even if such disclosures are encouraged, not required, under the EITI Standard).</p> <p>In <u>mining</u>, there are few systematic disclosures on the MINMIDT website aside from a set of 2016 guidance for various administrative procedures including license applications. Cameroon’s 2021 EITI Report provides an overview of the</p>

	<p>statutory license award and transfer process. The report provides inconsistent information between its Section 3.2.2.4 and Annex 12 in terms of the number of license awards in 2021, with the former citing 27 awards and the latter listing 41 licenses awarded in 2021, without explanation for this apparent inconsistency. The IA noted that it would try to provide explanations of this apparent inconsistency. Mining licenses are awarded on a first-come-first-served basis, so there is no competitive tender. The report’s description of the technical and financial criteria assessed in mining license awards and transfers list the documents required of the applicant, but without explaining how these documents are assessed (i.e. the criteria for assessing an applicant’s technical and financial capacities). In consultations, both the IA and government officials explained that there was no administrative document that described the way in which the documents were assessed (i.e. the criteria), but confirmed that no weighting was applied for different documents as all had to be submitted. The government officials explained that the assessment of technical documents was clearly defined within the MINMIDT given that this assessment pre-dated the 2016 Mining Code, but that the lack of implementing decree for the 2016 Mining Code meant that MINMIDT personnel could not follow set procedures for assessing applicants’ technical capacities.</p> <p>The EITI Report provides two different views on whether there were any non-trivial deviations in licensing practices in 2021. The report presents the results of the IA’s review of a sample of 12 license awards and transfers, which indicate a number of deviations from statutory procedures in the review of applicants’ technical and financial criteria and the timeframe for awarding licenses. Yet at the same time, the report presents a letter from the MINMIDT stating that there were no non-trivial deviations from statutory procedures in the awards of mining licenses in 2021, without explaining the basis for this statement. The MINMIDT’s confirmation also covers oil and gas license awards, despite the lack of such awards in 2021. In consultations, national secretariat staff explained that the two conclusions (the MINMIDT letter and the IA’s work) were not necessarily inconsistent, since the MINMIDT statement was one of policy while the IA’s work was a more detailed technical review. In consultations, the IA explained that the deviations identified related primarily to licenses for artisanal and small-scale mining, and were due to archiving challenges that had led to document loss rather than deviations that implied a corruption risk. The IA considered these deviations to be marginal. Several government officials noted that the cadastre department’s digitisation efforts were ongoing, but that in the meantime applications for mining licenses were sent to the MINMIDT’s general post box rather than the cadastre department directly. However, they did not consider that the transit of mining license applications through the Minister’s office had any impact on either the efficiency of the system or respect of the first-come-first-served principle given that the Minister’s office never delayed or withheld applications. The officials explained that the cadastre department’s digitisation efforts would lead it to be fully independent operationally from the MINMIDT.</p>
<p>Register of licenses (Requirement #2.3)</p>	<p>The Secretariat’s assessment is that Requirement 2.3 is mostly met, as in the previous Validation. The Secretariat’s view is that the objective of ensuring the public accessibility of comprehensive information on extractive industry property</p>

<p><i>Mostly met</i></p>	<p>rights is mostly fulfilled, given that similar gaps in the public accessibility of license information (namely dates of application and coordinates for a minority of active licenses) remain outstanding since the previous Validation. Consulted stakeholders from government and industry considered the objective to have been fulfilled.</p> <p>In <u>oil and gas</u>, the MINMIDT website systematically discloses an overview of all active oil and gas rights, including information on the names of operators and partners (and level of participating interests of each company), dates of application and award for 14 of the 26 active oil and gas licenses and dates of expiry for all 26 of them, coordinates for 23 of the 26 active licenses (the coordinates for the Zina-Makary, Moudi and Dissoni Nord blocks are missing) and commodities covered by each license. Two of the three oil and gas blocks for whom coordinates are not disclosed (Moudi and Dissoni Nord) involve a material company (Perenco) included in the scope of reporting. Cameroon's 2021 EITI Report provides a copy of this information, with the same gaps and without including the coordinates of active licenses. In consultations, SOE and state officials explained that gaps in the provision of dates for any licenses was due to loss of the government decrees awarding those licenses. However, while most of the technical aspects of Requirement 2.3 are met in the oil and gas sector, the Secretariat considers that the lack of coordinates for three active oil and gas licenses is a material gap that hinders broader transparency on property rights in the oil and gas sector, given that the local of oil and gas rights is a key aspect of property rights.</p> <p>In <u>mining</u>, the MINMIDT's cadastral portal systematically discloses all information on active mining licenses as listed in Requirement 2.3.b, aside from dates of application for certain mining licenses. The 2021 EITI Report provides an overview of the public accessibility of license information, noting only that dates of application are not available for "certain" mining licenses without providing the list of active mining licenses for which this information is not publicly accessible. In consultations, government officials and secretariat staff explained that all of the dates of application of all available government decrees had been scraped, but that the few licenses for which dates of application were missing was due to weaknesses in archiving of older documents.</p>
New corrective actions and recommendations	
<ul style="list-style-type: none"> • In accordance with Requirement 2.2, Cameroon should ensure that it explains the findings of its diagnostic of licensing practices in mining, oil and gas and concludes on whether the deviations are considered trivial or not. To strengthen implementation, Cameroon could consider extending its diagnostic of licensing practices to license renewals and the conclusion of contract amendments and riders. Cameroon is encouraged to use its EITI reporting to better describe the way in which technical and financial criteria are applied in practice in licensing in the mining, oil and gas sectors. • In accordance with Requirement 2.3, Cameroon should ensure that the coordinates are publicly available for all active licenses in the mining, oil and gas sectors. To strengthen implementation, Cameroon EITI is encouraged to pursue its efforts with the MINMIDT to locate and publish the 	

dates of application and award for those licenses for which that information is missing. The MINMIDT is encouraged to consider ways of improving the accessibility of oil and gas license data, both in open format and a cost-efficient map user interface.

Beneficial ownership (Requirement 2.5)

Overview of progress in the module

Adherence to Requirement 2.5 on beneficial ownership is assessed in full in Validation as of 1 January 2022 as per the framework agreed by the Board in June 2019.⁵ The assessment consists of a technical assessment and an assessment of effectiveness.

Technical assessment

The technical assessment is included in the Transparency template, in the tab on Requirement 2.5. The assessment shows that a legal and regulatory framework has been established for the collection of beneficial ownership data on companies operating in all sectors of Cameroon's economy, but that there is not yet a robust regulatory framework for the public disclosure of this information pending enactment of an implementing decree for the 2018 Transparency Code as confirmed in the 2021 EITI Report. Appropriate definitions have been agreed for the term "beneficial owner", but the definition and scope of politically exposed persons (PEPs) does not yet appear clearly defined for the purposes of beneficial ownership reporting. In the absence of a robust regulatory framework for the public disclosure of beneficial ownership data, at least for the extractive industries, Cameroon EITI has piloted beneficial ownership data collection and disclosure with a materiality threshold of 5% of a company's ownership or control, extending the scope of their data collection efforts to all companies holding mining and petroleum licenses in preparing the 2021 EITI Report. However, the level of data collection by Cameroon EITI has been below expectations to date, with less than ten extractive companies disclosing their beneficial ownership, and an additional three companies that are wholly-owned subsidiaries of publicly listed companies disclosing specific references to where their stock exchange disclosures can be publicly accessed. The MSG has published an assessment of the level of disclosures of beneficial owners of extractive companies by Cameroon EITI, but has not yet assessed the level of data collection efforts by the DGI as part of implementation of the beneficial ownership reporting provisions of the 2023 Budget Law. Some legal ownership (shareholder) information is disclosed related to extractive companies in the 2021 EITI Report, but such information remains inaccessible online for most companies operating in the extractive industries. Pending the completion of the company register's (RCCM) digitisation efforts, Cameroon EITI does not yet appear to have undertaken a diagnostic of the availability of legal ownership information on all extractive companies on demand from the RCCM, nor undertaken any efforts to improve the accessibility of this information.

⁵ <https://eiti.org/document/assessing-implementation-of-eitis-beneficial-ownership-requirement>.

Assessment of effectiveness

In the absence of a broader public assessment by the MSG or any government entity on the comprehensiveness and reliability of broader beneficial ownership data collection efforts through the Tax Department (DGI), an independent assessment of the effectiveness of Cameroon's beneficial ownership transparency efforts to date remains constrained to disclosure efforts through Cameroon's EITI Reports. While the MSG has focused on the logistics of data collection and disclosures, this focus has not yet extended to discussing which extractive companies could be considered "high risk" (for whom ownership disclosures should be prioritised). Likewise, the MSG does not yet appear to have considered how rigorous are requirements in the stock exchanges referred to and what ownership information is available from the stock exchange filings of the extractive companies. Nonetheless, the MSG appears to have adopted a rigorous approach to data collection, setting a low threshold of 5% for companies' disclosures of their beneficial owners and using a beneficial ownership reporting template (available in Annexe 13 of the 2021 EITI Report) that is broadly in line with the standard reporting template that the International Secretariat encourages countries to adopt. In total however, only one of 12 oil and gas companies and six of 70 mining companies have publicly disclosed their beneficial owners to date. Nonetheless, stakeholders consulted from all constituencies highlighted what they considered one of the EITI's most significant impacts, which was to lead the government to introduce beneficial ownership reporting requirements for companies operating in all sectors of the economy.

Cameroon's latest [mutual evaluation](#) by the Financial Action Task Force (FATF) under the Central African Action Group Against Money Laundering (GABAC) was completed in March 2022. It found that the government had not yet conducted a detailed study of the mechanisms through which legal entities created in Cameroon can be misused for money laundering and terrorism financing purposes. It also identified the availability of beneficial ownership information as a "major challenge", and strongly recommended the government to introduce legal reforms to identify beneficial owners when companies are established and modified. It also raised concerns about the lack of legal requirements to identify any PEP that is the beneficial owner of a company. Cameroon's latest peer review by the Global Forum on Transparency and Exchange of Information for Tax Purposes is reportedly ongoing in 2023, following the last [peer review](#) in 2016.

The lack of legal requirements related to the disclosure of PEPs as beneficial owners (without materiality threshold) and related to the public disclosure of beneficial ownership information remain the most significant impediments to further progress on beneficial ownership transparency. The low rate of company reporting to Cameroon EITI also indicates that greater focus is needed on capacity building of government and company staff, as well as credible sanctions for lack of reporting, even if the Secretariat recognises that several capacity building workshops have been held by the IA for the 2020 and 2021 EITI Reports for extractive companies expected to report their beneficial owners.

Progress by requirement and corrective actions

The detailed assessment of progress in addressing each EITI Requirement or corrective action is available from the data collection templates referenced in the annex to this report.

EITI Requirement / past corrective action and assessment	Summary of progress in addressing the EITI Requirement
<p>Beneficial ownership (Requirement #2.5)</p> <p><i>Partly met</i></p>	<p>The Secretariat’s assessment is that Requirement 2.5 is partly met. The Secretariat’s view is that the objective of enabling the public to know who ultimately owns and controls the companies operating in the country’s extractive industries is still far from being fulfilled, despite encouraging recent reforms including the 2023 Budget Law requiring companies in all sectors to report their beneficial owners to the tax department (DGI). While recent efforts by Cameroon EITI to collect beneficial ownership information from all extractive companies is welcome, it has proved unsuccessful to date. Consulted stakeholders from all constituencies considered that the objective was in the process of being fulfilled, arguing that the legal framework was broadly in place and that data collection by the tax department (DGI) had already started in earnest. The MSG’s comments on the draft Validation report argue for an upgrade in the assessment of Requirement 2.5, given the establishment of an enabling legal and regulatory framework for the collection of beneficial ownership data and legal provisions for transparency institutions such as the EITI to access this data for their purposes. The detailed civil society comments on the draft Validation report confirm that the plan is to ensure the public accessibility of the planned beneficial ownership register. The International Secretariat acknowledges the importance of these efforts, but considers that the lack of clear legal provisions ensuring the free public accessibility of all such beneficial ownership information, combined with the lack of collection of such ownership data on all companies holding and applying for extractive rights, implies that the objective is still far from being fulfilled. However, continued progress building on the recent reforms could support Cameroon’s swift progress in improving transparency in beneficial ownership in the extractive industries.</p> <p>The government has codified its policy on the public disclosure of beneficial owners of extractive companies in the 2018 Transparency Code, although the lack of implementing decree for this code to date has meant that the government’s policy is not operational, in the same way as its contract disclosure policy (and as noted in the 2021 EITI Report). Likewise, the 2016 Mining Code introduced a beneficial ownership disclosure threshold of 5%, but there has been no implementing decree for this code to date meaning this provision has not been implemented. The government now intends to revise the 2016 Mining Code. Cameroon’s 2021 EITI Report confirms that an enabling legal and regulatory environment for the collection and public disclosure of beneficial ownership of extractive companies has not yet been established. The 2023 Budget Law introduced a requirement for companies in all economic sectors to report their beneficial ownership to the Tax Department (DGI), but not</p>

	<p>to publicly disclose this information. On 27 September 2023, the Prime Minister issued Decree 2023/06801/CAB/PM as the implementing decree for the provisions of the 2023 Budget Law related to the collection of beneficial ownership information from all companies. In consultation, government officials explained that the intention was for the DGI to build a database of beneficial ownership data from all companies and to transfer it to the business register (RCCM) once its ongoing digitisation effort had been completed. The officials argued that this implied that this beneficial ownership information would be published by the RCCM, even though there were no legal provisions for the public disclosure of beneficial ownership data beyond the provisions of the 2018 Transparency Code that had not yet been implemented through decree. The government officials explained that the DGI had already collected the company statutes of 70% of companies registered with the DGI, which included information on the companies' legal owners. The MSG's comments on the draft Validation report argue that the September 2023 decree implementing legal provisions on beneficial ownership transparency includes provisions for transparency institutions like Cameroon EITI to access beneficial ownership data collected by the DGI for their own purposes. While this implies that Cameroon EITI may be able to publish this beneficial ownership data in due course without the need for further legal reforms, the lack of explicit legal or regulatory provisions to ensure the free public accessibility of all such data is a concern. The International Secretariat acknowledges the personal data privacy constraints, but emphasises the need to publish at least basic information on beneficial owners in accordance with Requirement 2.5.d, i.e. beneficial owner name, nationality, country of residence, status as politically exposed person and share of control of the company.</p> <p>In the absence of an enabling regulatory environment for both collection and public disclosure of beneficial ownership data, the MSG has piloted beneficial ownership reporting and agreed definitions of 'beneficial owner' and 'politically exposed person' (PEP) for EITI reporting purposes. It agreed a materiality threshold of 5% of a company's ownership or control for disclosure of beneficial owners, although there is no indication that the MSG agreed to disclose PEP ownership of extractive companies without any materiality threshold. However, several government officials consulted called for greater clarity on the scope of PEPs in the Cameroonian context, given that the Constitution only referred to the President, Prime Minister and members of the government, but it was not necessarily clear whether the senior management of government entities were also covered by this definition. The MSG's comments on the draft Validation report argue that the list of individual categorised as PEPs is clearly defined in the Constitution of Cameroon. For the first time as part of preparations of the 2021 EITI Report, Cameroon EITI sent beneficial ownership reporting templates to all companies holding mining, oil and gas rights. This effort has not yet extended to integrating beneficial ownership reporting as part of the licensing process in order to cover beneficial ownership disclosure from companies that apply, unsuccessfully, for extractive rights. The IA explained that the MINMIDT requested the company's statutes as part of the licensing process, but that</p>
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	<p>company statutes only contained the beneficial owners of those companies at incorporation, not updated for any subsequent changes.</p> <p>These laudable efforts of beneficial ownership data collection by Cameroon EITI have largely proved unsuccessful to date however, with only a one oil and gas company and six mining companies disclosing their beneficial ownership information, with 11 oil and gas companies and 16 mining companies reporting their shareholders (legal owners), while 54 mining companies and one oil company did not report anything on their legal or beneficial ownership (Annexes 10-1 and 10-2 of the 2021 EITI Report). The annexes provide only one oil and gas companies and two mining companies' disclosures of a link to statutory reporting to the stock exchange regulator where their mother company is publicly listed. Several government officials consulted considered that this level of beneficial ownership reporting was already a significant achievement and expressed confidence that the level of company reporting would increase in future years. Several company representatives considered that beneficial ownership was still a new concept for many companies, which explained why the company reporting rate was not yet higher.</p> <p>The MSG has published an assessment of Cameroon EITI's efforts to collect beneficial ownership data in the 2021 EITI Report. Yet the company register – the <i>Registre du Commerce et du Crédit Mobilier</i> (RCCM) – provides reportedly only on-demand shareholder information and there is no evidence that Cameroon EITI has sought to access shareholder (legal ownership) information on all extractive companies from the RCCM to provide a diagnostic of the availability of legal ownership information. State officials explained that the RCCM was currently digitising its company register, which was expected to enable online access to shareholder information on all companies, but did not provide a timeframe for completion of this important reform.</p>
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New corrective actions and recommendations

- In accordance with Requirement 2.5, Cameroon should ensure public disclosure of the beneficial owners of all corporate entities that apply for or hold a participating interest in an oil, gas or mining exploration or production license or contract. Cameroon is encouraged to establish a publicly accessible register of beneficial owners, at least for the extractive industries. Cameroon is required to document the government's policy and multi-stakeholder group's discussion on disclosure of beneficial ownership. This should include details of the relevant legal provisions, actual disclosure practices and any reforms that are planned or underway related to beneficial ownership disclosure. Information that is publicly disclosed about the identity of the beneficial owner should include the name of the beneficial owner, the nationality, and the country of residence, as well as identifying any politically exposed persons. The multi-stakeholder group should assess any existing mechanisms for assuring the reliability of beneficial ownership information and agree an approach for corporate entities within the scope of 2.5(c) to assure the accuracy of the beneficial ownership information they provide. Cameroon should also ensure that legal owners of all companies holding extractive licenses are publicly accessible.

State participation (Requirements 2.6, 4.2, 4.5, 6.2)

Overview of progress in the module

Cameroon's national oil company SNH has significantly strengthened its systematic disclosures since the previous Validation, publishing its complete audited financial statements for 2021 for the first time, alongside annual publications of oil and gas production, the state and SNH's share of production, and exports in open format. The creation of a new mining SOE in 2020, which began operations in 2021, is not yet comprehensively described in Cameroon's EITI reporting, including the rules and practices related to SONAMINES' financial relations with the state. There is an opportunity to replicate Cameroon's comprehensive EITI disclosures on state participation in the oil and gas sector, to the mining sector. There is also scope for extending EITI reporting to the rules and practices related to procurement, contracting and corporate governance for both mining and petroleum SOEs, given the public interest in corporate governance of SOEs.

The national oil company SNH's systematic disclosures of state in-kind oil and gas revenue collections and sales cover only volumes of oil and gas rather than the value of sales, and are not yet disaggregated by individual cargo in the same way as SNH's submissions for the EITI Reports. Cameroon has continued to publish this cargo-level data in its EITI Reports, but has not yet extended its in-kind oil sales disclosures to cover the rules and practices related to the selection of buyers for the state's in-kind revenues. The Glencore [plea agreement](#) with the US and UK Governments in 2022 named SNH and the national refinery SONARA as being involved in the alleged corruption practices related to the sale of Cameroon's oil, and generated considerable public debate in Cameroon (as documented in the MSG's 'Outcomes and impact' template). Following a [press release](#) from SNH in May 2022 stating that the national oil company does not engage in such practices, the MSG held a dedicated discussion of the issue in August 2023, while SNH has begun legal proceedings against Glencore in Cameroonian courts. However, Cameroon EITI has not yet begun working with SNH on disclosing additional information that could support informed public debate on the alleged corrupt practices, such as disclosures of historical oil sales data or a diagnostic of the rules and practices related to the selection of buyers for SNH's oil sales. There are significant opportunities for Cameroon EITI to conduct further disclosures and analysis to respond to significant public interest in this issue.

Cameroon's EITI Reports have continued to comprehensively and reliably disclose transactions related to SNH, including its 'direct interventions' on behalf of the state in the field of national security (see *Requirements 5.1 and 6.2*). However, while Cameroon has extended its EITI disclosures to the new mining SOE established in 2020, SONAMINES, these have not yet comprehensively and reliably disclosed SONAMINES' in-kind transfers to the state (i.e. the transfers of in-kind 'synthetic tax' gold collections to the Treasury) nor any state financial transfers to SONAMINES to cover its operating costs in 2021. There are opportunities to strengthen transparency around transactions involving SONAMINES through systematic disclosures on the SONAMINES website, which Cameroon EITI disclosures could build on by providing a diagnostic of the rules and practices related to SONAMINES' financial transactions with the state.

The publication of SNH's 2021 audited financial statements strengthened somewhat the systematic disclosures of government expenditures undertaken by extractive SOEs outside of the conventional budget and expenditure cycle. The International Secretariat continues to consider that SNH's 'direct interventions' are forms of quasi-fiscal expenditures undertaken on behalf of the state outside of the conventional budget cycle. Cameroon has sustained the level of transparency on these primarily national security expenditures undertaken by SNH that had been achieved in the previous Validation, but did not address the corrective action from the previous Validation to disaggregate these 'direct interventions' by specific budget code. There are opportunities for Cameroon to leverage the planned reforms of the single Treasury account to strengthen systematic disclosures of SNH's 'direct interventions', which could support SNH's progress on Cameroon's commitments under the IMF programme.

Progress by requirement and corrective actions

The detailed assessment of progress in addressing each EITI Requirement or corrective action is available from the data collection templates referenced in the annex to this report.

EITI Requirement / past corrective action and assessment	Summary of progress in addressing the EITI Requirement
<p>State participation (Requirement #2.6)</p> <p><i>Mostly met</i></p>	<p>The Secretariat's assessment is that Requirement 2.6 is mostly met, which represents a regression from the previous Validation. The Secretariat's view is that the objective of ensuring an effective mechanism for transparency and accountability for well-governed SOEs and state participation is mostly fulfilled. While most of the technical aspects of Requirement 2.6 are publicly addressed in the oil and gas sector, the Secretariat's view is that the objective is only mostly fulfilled given the perfunctory nature of SNH disclosures (e.g. of its audited financial statements), the continued lack of clarity on the decision-making in directing SNH to undertake certain expenditures on behalf of the state (and not others), and the concerns over corporate governance of the national oil company (and the national refinery company) raised by the Glencore affair. Consulted government stakeholders considered that this objective had been fulfilled with the strengthening of SNH's systematic disclosures, with some stakeholders explaining that the mining SOE was just being established as an explanation for the lack of comprehensive coverage of SONAMINES' financial relations with the state in the latest EITI Report.</p> <p>In <u>oil and gas</u>, the national oil company SNH has made improvements in its systematic disclosures of data on its production, exports and succinct summaries of its financials, as well as publication for the first time the full text of the audited financial statements of its two entities – SNH-Mandat (on behalf of the state) and SNH-Fonctionnement (a commercial entity) – for 2021 only, in the weeks leading up to this Validation. In consultations, government officials confirmed that the intention was for SNH to publish its complete financial statements annually, and that the 2022 financial statements would be published as soon as the SNH-</p>

	<p>Mandat statements received final approval. However, the Secretariat considers that it should also have been possible to publish the audited financial statements of the two SNH entities for years prior to 2021. Several CSOs consulted highlighted the publication of SNH's full financial statements as a significant impact of the EITI process. Some state officials consulted noted that the Chamber of Accounts had launched an audit of SNH as a SOE in 2023, which was entirely separate from the annual audit of SNH's financial statements.</p> <p>Cameroon's 2021 EITI Report confirms that SNH is the only material SOE for EITI reporting purposes and justifies the exclusion of SONARA as a midstream SOE. The report describes the rules related to SNH's distribution of profits, retained earnings, reinvestments, but not of third-party financing. However, the statutes of SNH confirm SNH as a company 100% owned by the state, implying that it cannot seek third-party equity finance. In consultations, the IA confirmed that SNH was statutorily entitled to raise third-party debt financing (e.g. through bank loans) but that it usually did not resort to this given that its Treasury usually had ample funds to finance its operations. The EITI Report describes the practices of SNH's dividends and retained earnings in 2021, but not of its reinvestments or third-party (debt) financing. However, the 2021 audited financial statements of both SNH-Mandat and SNH-Fonctionnement published in September 2023 provide the required data on SNH's reinvestments and third-party (debt) financing in 2021. Cameroon's EITI reporting has listed the state and SNH's equity interests in upstream companies and projects, including the terms for all but its equity interests in upstream oil and gas companies. Nonetheless, in consultations the IA confirmed that SNH's equity interests in upstream oil and gas companies is full-paid equity. Cameroon has started expanding its EITI reporting to providing a succinct overview of the rules related to corporate governance and links to the composition of SNH's board of directors and organigramme, but this has not yet expanded to a more detailed diagnostic of SNH's corporate governance, particularly with longstanding leaders in the company.</p> <p>In <u>mining</u>, without systematic disclosures of information on mining SOEs, Cameroon EITI has provided the most extensive information on SOEs like recently (2020) created SONAMINES, even if there remain gaps in its coverage of the rules and practices of SONAMINES' financial relations with the state. The 2021 EITI Report remains ambiguous on the materiality of mining SOEs in the year under review, although the International Secretariat considers that newly established SONAMINES was a material entity in 2021 given its taking over the responsibility from the CAPAM to collect state revenues in kind from semi-mechanised gold miners as of the second quarter of 2021. In consultations, the IA explained that SONAMINES started collecting 'synthetic tax' from artisanal miners in mid-2021, but that aside from this it did not have any operations in 2021. Nonetheless, the IA concurred that SONAMINES' collection of material revenues on behalf of the government in the second half of 2021 would qualify it as a material mining SOE for EITI reporting. The EITI Report does not clearly categorise the state asset manager SNI (Société Nationale d'Investissement) as a SOE, and the Secretariat does not consider it a SOE given that it remains a passive investor with only a 40% equity interest in CAMIRON. The report does not explain the rules and practices of the financial relations between SONAMINES</p>
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	<p>and the state, although it does list the state's equity in mining companies and the terms attached to each equity interest. The report does not comment on the reasons for the lack of accessibility of SONAMINES' audited financial statements, as expected under Requirement 2.6.b, nor the rules and practices related to its corporate governance aside from listing the members of its board of directors. In consultations, the IA and state officials explained that the IA had requested copies of SONAMINES' audited financial statements for 2021 but that it had not received them. There are opportunities to significantly strengthen Cameroon's use of EITI reporting as a diagnostic of the rules and practices related to SOEs in the mining sector.</p>
<p>Sale of the state's in-kind revenues (Requirement #4.2)</p> <p><i>Fully met</i></p>	<p>The Secretariat's assessment is that Requirement 4.2 is fully met, as in the previous Validation. The Secretariat's view is that the objective of ensuring transparency in the sale of in-kind revenues of minerals, oil and gas is fulfilled, given Cameroon's use of its EITI disclosures to build on the more aggregated systematic disclosures on the sale of the state's in-kind oil and gas revenues on the SNH website. Consulted stakeholders from government broadly considered that the objective had been fulfilled, while representatives from other constituencies did not express particular views on the issue. However, several CSOs called for more transparency on oil sales in response to the corruption allegations involved in the Glencore affair.</p> <p>In <u>oil and gas</u>, the SNH website systematically discloses annually data on the state's in-kind crude oil revenues per project and by quarter, SNH's aggregate sales of crude oil, natural gas and liquefied petroleum gas (LPG), although this data is only disaggregated by buyer for natural gas and LPG, not for crude oil sales. SNH's disclosures only cover oil volumes, not values. In consultations, SOE officials explained that it should theoretically be possible for SNH to systematically disclose data on sales of the state's in-kind oil and gas revenues at cargo level, given that this data was already being provided to and disclosed by Cameroon EITI. Cameroon's EITI Reports have built on these systematic disclosures to provide granular cargo-level data for the sale of the state's in-kind revenues of crude oil, natural gas, LPG and liquefied natural gas (LNG), although the report clarifies that in the case of LNG and LPG, it is the operator that sells the state's share on its behalf, transferring the proceeds to SNH-Mandat. Cameroon's 2021 EITI Report provides additional detail on SNH's subsidiary TRADEX's trading of crude oil. While Cameroon has gradually expanded its EITI disclosures on commodity sales, it has yet to disclose additional information on the rules and practices related to the buyer selection process, information of high relevance to the vibrant public debate on the Glencore affair. In consultations, state officials explained that SNH no longer sold crude oil on the basis of term contracts since 2019, and had transitioned to a system of only spot sales through competitive tender since then.</p> <p>In <u>mining</u>, Cameroon's 2021 EITI Report provides detailed information on in-kind payments of gold by artisanal and semi-mechanised miners to the state, which consist of three revenue streams (corporate income tax, the state's share of production and ad valorem tax) combined and paid as one 'synthetic tax' ('<i>impôt synthétique</i>'). The revenue was collected by CAPAM until end of Q1 2021 and</p>

	<p>SONAMINES from Q2 2021 onwards according to the EITI Report, and subsequently transferred as gold lingots to the Treasury. Consultations with state officials however revealed that CAPAM collected ‘synthetic tax’ until June 2021, while SONAMINES took over from July 2021. While the Treasury is meant to sell the gold in order to partly fund subnational transfers (see <i>Requirement 5.2</i>), it has only started commercialising the gold since 2023. The EITI Report provides the volumes of in-kind revenues collected by CAPAM/SONAMINES and the volumes transferred to the Treasury, as well as the estimated value of gold shipments. While the data on in-kind gold volumes collected is only disclosed as one ‘synthetic tax’, in consultations the IA confirmed that it was methodologically sound to divide the gold volumes by the statutory shares of each of the three revenue streams within ‘synthetic tax’. Thus, the Secretariat considers that the lack of disaggregation of ‘synthetic tax’ in-kind revenues by individual revenue stream does not constitute a material gap in progress towards the objective of transparency in the state’s in-kind gold revenues.</p>
<p>Transactions related to state-owned enterprises (Requirement #4.5)</p> <p><i>Mostly met</i></p>	<p>The Secretariat’s assessment is that Requirement 4.5 is mostly met, which represents a regression from the previous Validation. The Secretariat’s view is that the objective of ensuring the traceability of payments and transfers involving SOEs is mostly fulfilled, given weaknesses in disclosures of transactions related to SOEs in the mining sector. Consulted stakeholders did not express particular views on whether the objective had been fulfilled.</p> <p>In <u>oil and gas</u>, Cameroon’s 2021 EITI Report comprehensively discloses and reconciles oil and gas companies’ payments to SNH-Mandat and SNH-Fonctionnement, including five revenue streams collected in cash and three revenue streams collected in-kind. The report also discloses and reconciled SNH-Mandat and SNH-Fonctionnement’s transfers to the state (e.g. dividends) and provides unilateral disclosure of SNH-Mandat’s transfers to other government entities on behalf of the state, in the form of SNH’s ‘direct interventions’. These ‘direct interventions’ are not reconciled with disclosures from the beneficiary government entities given that they are outside of the scope of reconciliation (being non-extractive government entities), but are compared with disclosures from the Treasury. The report also confirms the lack of financial transfers from the state to SNH in the period under review.</p> <p>In <u>mining</u>, the 2021 EITI Report discloses information on the new mining SOE SONAMINES’ collection of revenues in-kind from artisanal and semi-mechanised miners on behalf of the state in the form of the ‘synthetic tax’, including unilateral reporting of the volumes collected in aggregate, not disaggregated by individual artisanal and semi-mechanised miner (see <i>Requirement 4.2</i>). The report also provides unilateral disclosures on SONAMINES’ transfers of physical gold collected as ‘synthetic tax’ to the Treasury, although these transfers are not reconciled despite being considered material. The report does not comment on the existence of any financial transfers from the state to SONAMINES in 2021, which presents a material gap in the Secretariat’s opinion given the lack of clarity around how the new mining SOE financed its operating expenditures in 2021 (see <i>Requirement 2.6</i>).</p>

	<p>There are not yet systematic disclosures of transactions involving SOEs either in the mining or petroleum sectors, aside from the recent disclosure of the full set of SNH's audited financial statements for 2021 that provide information on transactions related to the national oil company's two legal entities, SNH-Mandat and SNH-Fonctionnement.</p>
<p>Quasi-fiscal expenditures (Requirement #6.2)</p> <p><i>Mostly met</i></p>	<p>The Secretariat's assessment is that Requirement 6.2 is mostly met, as in the previous Validation. The Secretariat's view is that the objective of transparency in extractive-funded quasi-fiscal expenditures to ensure accountability in their management is mostly fulfilled, given that the previous Validation's corrective action to disaggregate SNH's 'direct interventions' by budget code remains outstanding and would be needed to ensure that transparency on these 'direct interventions' is commensurate with that of conventional budgetary expenditures. While the MSG and IA do not consider that Requirement 6.2 is applicable to Cameroon in 2021 based on its view that extractive SOEs did not undertake any quasi-fiscal expenditures in 2021, the Secretariat considers that there are at least two types of activities by the national oil company SNH that are not aligned with conventional budgetary discipline but cover expenditures that would normally be considered the preserve of the state (i.e. national security spending and de facto subsidies to the national refinery) and should thus be considered forms of quasi-fiscal expenditures. Consulted government stakeholders confirmed their view that the objective of this requirement was not applicable to Cameroon in the period under review. In consultations, the IA considered that SNH's 'direct interventions' were in between conventional budgetary expenditures and quasi-fiscal expenditures.</p> <p>There are limited systematic disclosures of information on extractive SOEs' quasi-fiscal expenditures by government entities, beyond the publication of the 2021 audited financial statements of SNH-Mandat, which provide the aggregate value of SNH's 'direct interventions' for 2021. While the government's TOFE includes a line on aggregate 'direct interventions' by SNH, the TOFE does not appear to be routinely published online.</p> <p>Cameroon's 2021 EITI Report confirms the lack of quasi-fiscal expenditures undertaken by mining SOEs in 2021. The EITI Report documents the MSG's view that SNH's '<u>direct interventions</u>' on national security on behalf of the state are not forms of quasi-fiscal expenditures. This argument is based on the fact that all national security expenditures are included in the annual national budget law and that all SNH 'direct interventions' are regularised ex post in the TOFE and budget execution law, through the reconciliation of these SNH expenditures with Treasury and Ministry of Finance accounts. The International Secretariat's view is that SNH's 'direct interventions' are undertaken outside of the conventional budget and expenditure cycle, in line with the categorisation of these expenditures in Cameroon's 2018 letter of intent in the context of its request for an extended credit facility from the IMF. While the aggregate value of SNH's 'direct interventions' is reflected in the government's TOFE and budget execution law, the Secretariat considers that there remains a lack of transparency on the decision-making involved in directing SNH to cover certain types of budgeted national security expenditures and not others. Indeed, significant fluctuations in</p>

	<p>the value of ‘direct interventions’ to specific beneficiaries and the identity of beneficiaries since Cameroon’s EITI reporting has provided this data (i.e. since the 2018 EITI Report) imply that there is significant discretion in the types of national security expenditures covered by SNH on an annual basis. In addition, the fact that a share of national security expenditures are funded through accounts other than the single Treasury account weakens ex-ante parliamentary oversight of these expenditures. Finally, the ex-post regularisation of SNH’s ‘direct interventions’ in the TOFE and budget execution report weakens the oversight of the supreme audit institution, the Chamber of Accounts (<i>‘Chambre des comptes’</i>), given the lack of communications between the Chamber of Accounts and the Superior State Council (<i>‘Conseil Supérieur de l’Etat’</i> – CONSUPE), which is tasked with auditing decision-making on public expenditures, including on SNHG’s ‘direct interventions’. The CONSUPE does not publish its audit reports and is answerable only to the Presidency, which has direct oversight of the national oil company SNH. In consultations, several government officials confirmed that SNH was directed to undertake ‘direct interventions’ but that it then provided receipts of these expenditures to the Budget Department, for them to reconcile these items with budgeted expenditures and allocate a budget code to each. However, government officials and development partners explained that there were always a number of SNH ‘direct interventions’ that were categorised as “expenditures to regularise” in the budget execution report at the end of the year. Some development partners also highlighted the risk that SNH’s ‘direct interventions’ displaced other budgeted expenditures, given that it diverted state revenues from the Treasury.</p> <p>Nevertheless, the 2021 EITI Report is based on dedicated reporting templates sent to SNH and the Treasury (DGTCFM) developed for the reporting of SNH’s ‘direct interventions’. The EITI Report provides the value of these ‘direct interventions’ in 2021 disaggregated by each of the 11 beneficiary government entities, providing only a very succinct description of the purpose of transfers (e.g. ‘national security’). However, while the previous Validation’s corrective action required Cameroon EITI to present data on SNH’s ‘direct interventions’ for each beneficiary disaggregated between the two budget codes for these interventions directed to national security (i.e. Account 2279 in the “Investment” line (covering “material, machinery, installations, technology and operational services”) and Account 6189 in the “operations” line (covering “other external payment services”)), the 2021 EITI Report does not present this data to these required levels of disaggregation. Rather, it refers to most expenditures as being linked generally to “national security” without specification of the budget code. State officials explained that SNH would not know under which budget code these expenditures would be categorised, but that the Budget Department would be able to provide this information. Other state officials explained that the Budget Department could only provide the budget code for those ‘direct interventions’ that were not categorised as “expenditures to regularise” at the end of the year. Thus, the Secretariat continues to consider that the level of transparency in disclosures of SNH’s ‘direct interventions’ either by SNH or the national budget is not yet commensurate with other payments and revenue streams that transit through the single Treasury account.</p>
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	<p>The 2021 EITI Report also documents the MSG’s view that the state-owned oil refinery <u>SONARA’s outstanding debt for payment of crude oil supplies from SNH</u> – worth a total of XAF 28.3bn (around USD 45.6m) in 2021 – does not constitute a form of quasi-fiscal expenditures. This argument is based on the view that these remain outstanding arrears in payment rather than a form of subsidy, given that SNH intends to be repaid for this debt, which is still carried in its balance sheet. The EITI Report provides calculations of the additional interest due on the XAF 28.3bn in principle due, estimated at an additional XAF 16.3bn (around USD 26.2m), bringing the total due by SONARA to SNH to XAF 44.6bn (around USD 71.8m) in 2021. In consultations, the IA argued that the inclusion of additional interest owed on the original debt demonstrates that this outstanding debt does not constitute a form of quasi-fiscal expenditures, since interest owed was calculated based on prevailing market rates. The EITI Report explains that SONARA has formally requested from the Ministry of Finance that this outstanding debt be forgiven, although this request is still in process of being considered. In consultations, the IA considered that this outstanding debt would become a form of quasi-fiscal expenditure only if and when the Ministry of Finance writes off this debt, which could potentially then be counted as a loss for SNH. While the International Secretariat considers the calculations of outstanding interest owed on the original SONARA debt to SNH to be robust, it maintains its view that this outstanding debt represents a de facto subsidy to SONARA by SNH pending the regularisation of this outstanding debt.</p> <p>Finally, the EITI Report describes two other SNH activities that it explicitly considers do not constitute forms of quasi-fiscal expenditures. The first consists of SNH-Mandat’s retention of state revenues to cover the costs associated with the state’s participation in oil and gas projects. The second consists of confirmation that the pricing of SNH’s crude oil sales was aligned with international prices. The Secretariat agrees with the MSG’s view that neither of these constitute forms of quasi-fiscal expenditures.</p>
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New corrective actions and recommendations

- In accordance with Requirement 2.6, Cameroon should ensure public disclosure of an explanation of the role of material state-owned enterprises (SOEs) in the mining sector and prevailing rules and practices regarding the financial relationship between the government and mining SOEs, i.e. the rules and practices governing transfers of funds between the SOE(s) and the state, retained earnings, reinvestment and third-party financing. SOEs in both mining and petroleum sectors are expected to publicly disclose their audited financial statements, or the main financial items (i.e. balance sheet, profit/loss statement, cash flows) where financial statements are not available. To strengthen implementation, Cameroon is encouraged to describe the rules and practices related to material SOEs’ operating and capital expenditures, procurement, subcontracting and corporate governance, e.g. composition and appointment of the Board of Directors, Board’s mandate and code of conduct.
- To strengthen implementation of Requirement 4.2, Cameroon is encouraged to work with SNH, SONAMINES and relevant line ministries such as the Ministry of Finance and MINMIDT to strengthen the two SOEs’ systematic disclosures on the collection and sales of the state’s in-kind revenues in crude oil, natural gas and gold. These systematic disclosures should cover the

volumes received and sold by the state (or third parties appointed by the state to sell on their behalf), the revenues received from the sale, and the revenues transferred to the state from the proceeds of oil, gas and minerals sold, disaggregated by individual buyer. To strengthen implementation and to respond to the vibrant public debate on these issues, Cameroon EITI and SNH are encouraged to disclose a description of the process for selecting the buying companies, the technical and financial criteria used to make the selection, the list of selected buying companies, any material deviations from the applicable legal and regulatory framework governing the selection of buying companies, and the related sales agreements. Companies buying oil, gas and/or mineral resources from the state, including state-owned enterprises (or third parties appointed by the state to sell on their behalf), are encouraged to disclose volumes received from the state or state-owned enterprise and payments made for the purchase of oil, gas and/or mineral resources.

- In accordance with Requirement 4.5, Cameroon should ensure that all material transactions involving SOE(s) in the mining sector are publicly disclosed in a comprehensive and reliable manner, including SOE transfers to the state and any state financial support transferred to the SOE(s). To strengthen implementation, Cameroon EITI is encouraged to work with SONAMINES to strengthen its systematically disclosed information on its corporate website.
- In accordance with Requirement 6.2, Cameroon should ensure public disclosures on any extractive SOEs' quasi-fiscal expenditures, i.e. government expenditures undertaken outside of the conventional budget and expenditure cycle, through a reporting process that achieves a level of transparency commensurate with other payments and revenue streams and includes SOE subsidiaries and joint ventures. This should include information on SNH's 'direct interventions' that is commensurate with other conventional budgeted expenditures, i.e. disaggregated by specific budget code, and could be disclosed in a financial report. To strengthen implementation, Cameroon could work with relevant state entities such as the Ministry of Finance, its Budget Department and SNH to strengthen systematic disclosures of SNH's 'direct interventions' on behalf of the state.

Production and exports (Requirements 3.2, 3.3)

Overview of progress in the module

Cameroon has continued to use its EITI reporting to disclose comprehensive data on production and export volumes and values, albeit more disaggregated by project for oil and gas than for mining. The SNH website systematically discloses oil and gas production and export data by project, although there are no such systematic disclosures yet for mining. There are opportunities for Cameroon to build on its more recent reporting of illegal mineral exports to enhance transparency on the methods for calculating extractive commodity production and export volumes and values.

Progress by requirement and corrective actions

The detailed assessment of progress in addressing each EITI Requirement or corrective action is available from the data collection templates referenced in the annex to this report.

EITI Requirement / past corrective action and assessment	Summary of progress in addressing the EITI Requirement
<p>Production (Requirement #3.2)</p> <p><i>Fully met</i></p>	<p>The Secretariat’s assessment is that Requirement 3.2 is fully met, as in the previous Validation. The Secretariat’s view is that the objective of ensuring public understanding of extractive commodities production levels and their valuation is fulfilled, given Cameroon’s use of its EITI reporting to provide information on oil, gas and mineral production, including estimates of artisanal and semi-mechanised mining production. Consulted stakeholders did not express any views on progress towards this objective.</p> <p>In <u>oil and gas</u>, the national oil company SNH’s website systematically discloses on an annual basis information on monthly production volumes and values of crude oil and natural gas production, albeit without disaggregating crude oil from oil condensate production. This information is broken down by individual producing oil and gas project. Cameroon’s 2021 EITI Report republishes this information, albeit without adding value by describing the methodology for tracking and calculating production volumes and values. While crude oil and oil condensate production values are not presented disaggregated by specific commodity, there is sufficient information in the EITI Report to estimate production values for each separately.</p> <p>In <u>mining</u>, there are no systematic disclosures of mineral production data at present, either on the MINMIDT website or elsewhere. The 2021 EITI Report provides mineral production volumes and values for gold (including from semi-mechanised gold production), diamonds, and six of the seven types of quarrying materials (used for construction), with only production values for ‘moellons’ (rubble) missing from the EITI Report. The Secretariat considers this to be a gap of marginal importance, given that none of the material companies included in the scope of reporting produced this quarrying commodity in 2021 and that the value of this commodity is low.</p>
<p>Exports (Requirement #3.3)</p> <p><i>Fully met</i></p>	<p>The Secretariat’s assessment is that Requirement 3.3 is fully met, as in the previous Validation. The Secretariat’s view is that the objective of ensuring public understanding of extractive commodities export levels and the valuation is fulfilled, given SNH’s systematic disclosures of oil and gas export data as well as Cameroon’s use of its EITI reporting to clarify mining exports. Consulted stakeholders did not express any views on progress towards this objective.</p> <p>In <u>oil and gas</u>, the SNH website systematically discloses on an annual basis crude oil and natural gas monthly export volumes and values, disaggregated by project. While crude oil and oil condensate exports are not presented in a disaggregated manner, the Secretariat’s view is that this is a marginal gap given that both are</p>

	<p>exported in the form of crude oil. Cameroon’s 2021 EITI Report republishes this information, albeit without adding value by describing the methodology for tracking and calculating export volumes and values.</p> <p>In <u>mining</u>, there are no systematic disclosures of mineral export data aside from diamond export data published through the Kimberley Process. The 2021 EITI Report provides mineral export volumes and values for gold and diamonds, the two mineral commodities exported, covering mineral smuggling and seizures of illegal gold exports. This is a welcome practice that could be expanded to include more third-party estimates of other extractive commodities smuggling, such as gold. There is no further information on the methodologies for tracking and calculating export volumes and values.</p>
New corrective actions and recommendations	
<ul style="list-style-type: none"> • To strengthen implementation of Requirement 3.2, Cameroon is encouraged to work with relevant government entities including MINMIDT and SNH to strengthen systematic disclosures of production volumes and values for all mineral and petroleum commodities produced. Cameroon could expand its use of EITI reporting to ensure that extractive production data is further disaggregated by region, company or project, and include sources and the methods for calculating production volumes and values. • To strengthen implementation of Requirement 3.3, Cameroon is encouraged to work with relevant government entities including MINMIDT and SNH to strengthen systematic disclosures of export volumes and values for all mineral and petroleum commodities exported. Cameroon could expand its use of EITI reporting to ensure that extractive export data is further disaggregated by region, company or project, and include sources and the methods for calculating export volumes and values. Cameroon could also expand its use of EITI reporting to include estimates of illegal extractive commodity (gold, diamonds) exports, building on its recent work in disclosing illegal gold seizures. 	

Revenue collection (Requirements 4.1, 4.3, 4.4, 4.7, 4.8, 4.9)

Overview of progress in the module

Cameroon has sustained its comprehensive disclosures of extractive companies’ material payments and government revenues in the four (2018-2021) EITI Reports published since the previous Validation. The coverage of the oil and gas sector has remained more extensive than that of the mining sector, but, given the low materiality of government mining revenues, the reconciliation coverage of EITI Reports has remained above 99% of government extractive revenues. Systematic disclosures of company payments and government revenues remains very limited in Cameroon, with only the national oil company and a private oil and gas company (Gaz du Cameroun) publishing any relevant information systematically. There is an opportunity with the planned reforms of the single Treasury account to systematically tag government revenues from the extractive industries and routinely publish government revenue data from the extractive industries on relevant government (Ministry of Finance) websites.

There were no new barter-type infrastructure provisions in Cameroon’s extractive industries in the period under review. Cameroon has continued its traditional EITI disclosures of government revenues from the transportation of crude oil through the Chad-Cameroon pipeline. There is an opportunity for Cameroon to use its EITI reporting to comment on more recent developments that have attractive public attention, such as the impact of ExxonMobil’s withdrawal from Chad on the ownership and operations of the Chad-Cameroon pipeline.

Cameroon has made further progress in disaggregating its EITI disclosures of company payments and government revenues at a project level, for those government revenues levied on this basis. The 2021 EITI Report presents the vast majority of applicable company payments and government revenues disaggregated by project, enabling more scrutiny of payments to government associated with a single project. Given that a majority of the government’s oil and gas revenues are levied at a project level, this represents a commendable improvement in the relevance of Cameroon’s EITI disclosures of financial data.

Cameroon has however struggled to significantly improve the timeliness of its EITI disclosures to improve their relevance to public debate and policymaking in the period since the last Validation. Following a three-month suspension by the EITI Board in April-June 2021 due to delays in publishing the 2018 EITI Report, Cameroon has published EITI Reports two years after the end of the fiscal period covered, but not significantly sooner other than the 2021 EITI Report published in October 2023. There are significant opportunities for Cameroon EITI to work with relevant government entities and extractive companies to strengthen their systematic disclosures of EITI data, and to re-engineer the EITI reporting process to build on these timelier disclosures.

With regards to data quality and assurances, Cameroon has continued to adopt appropriate measures to ensure the reliability of financial data in EITI Reports, but has not yet used its EITI disclosures as a diagnostic of prevailing government and extractive company audit and assurance practices, with a view to formulating recommendations for broader reforms in these audit and assurance practices.

Progress by requirement and corrective actions

The detailed assessment of progress in addressing each EITI Requirement or corrective action is available from the data collection templates referenced in the annex to this report.

EITI Requirement / past corrective action and assessment	Summary of progress in addressing the EITI Requirement
Comprehensive disclosure of taxes and revenues (Requirement #4.1) <i>Fully met</i>	The Secretariat's assessment is that Requirement 4.1 is fully met, as in the previous Validation. The Secretariat’s view is that the objective of ensuring comprehensive disclosures of company payments and government revenues from oil, gas and mining is fulfilled, given Cameroon’s use of its EITI reporting to comprehensively disclose material company payments and government revenues

	<p>from the extractive industries. Consulted stakeholders from all constituencies broadly considered this objective to have been fulfilled through EITI reporting.</p> <p>There are no systematic disclosures of government revenues from the extractive industries in Cameroon at present, although the Secretariat’s understanding of planned reforms to the single Treasury account backed by the IMF is that they involve plans to systematically disclose extractive industry revenues by revenue flow in the government’s financial management dashboard and budget in future. Cameroon’s 2021 EITI Report describes the MSG’s approach to agreeing the scope of EITI reporting, with its materiality decisions related to revenue streams, government entities and extractive companies considered reasonable. While the target reconciliation coverage remains around 50% of government revenues from the mining sector, the mining sector’s low contribution to government revenues means that Cameroon’s 2021 EITI Report still covered over 99.9% of government revenues from the mining and petroleum sectors combined. In consultations, the IA expressed confidence that all material company payments and government revenues had been comprehensively and reliably reconciled in the 2021 EITI Report. All material extractive companies and government entities duly reported for the 2021 EITI Report, which contains a statement from the IA that the reconciliation of material payments and revenues was considered comprehensive. In addition, government entities provided full unilateral disclosure of total government revenues, including from companies below the materiality threshold.</p> <p>Going beyond the minimum EITI Requirement, Cameroon has piloted the public disclosure of oil and gas company costs in the 2021 EITI Report for the first time, making progress towards new aspects of the 2023 EITI Standard (Requirement 4.10). While there is no explanation for the lack of public disclosures of extractive companies’ audited financial statements, as expected under Requirement 4.1.e, the Secretariat considers that, on balance, all required technical aspects of Requirement 4.1 have been addressed.</p>
<p>Infrastructure provisions and barter arrangements (Requirement #4.3)</p> <p><i>Not applicable</i></p>	<p>The Secretariat's assessment is that Requirement 4.3 remains not applicable, as in the previous Validation. The Secretariat’s view is that the objective of ensuring public understanding of infrastructure provisions and barter-type arrangements does not apply in Cameroon during the period under review.</p> <p>The 2021 EITI Report confirms that there are no active barter-type infrastructure arrangements in Cameroon in 2021. While the MSG’s own Transparency template asked for clarification around the status of the agreement to supply natural gas from the Logbaba field to industrial customers in Douala, the Secretariat’s view is that this appears to consist of a sale of natural gas rather than the settlement of a payment to government in-kind. None of the stakeholders consulted expressed any views on progress towards this objective, although the Secretariat concludes that it is not applicable to Cameroon in the period under review.</p>

<p>Transportation revenues (Requirement #4.4)</p> <p><i>Fully met</i></p>	<p>The Secretariat's assessment is that Requirement 4.4 is fully met, as in the previous Validation. The Secretariat's view is that the objective of ensuring transparency in government and SOE revenues from the transit of oil, gas and minerals is fulfilled, given Cameroon's long-standing use of its EITI reporting to disclose comprehensive information on the Chad-Cameroon pipeline and transit fees. Consulted stakeholders did not express particular views on progress towards this objective.</p> <p>In the absence of systematic disclosures of information on the Chad-Cameroon pipeline transit fees to the government, Cameroon EITI has sustained its long-established annual disclosures of information on the pipeline company COTCO's payments to government, disaggregated by revenue stream. Cameroon has not used its EITI reporting published in 2023 to comment on the changes in the composition of the pipeline consortium following ExxonMobil's exit from Chad in 2023. Moreover there is no evidence that Cameroon EITI has discussed the implications of the change in operatorship of Chad's Doba project and change in ownership of the Chad-Cameroon pipeline on Cameroon's transit revenue prospects.</p>
<p>Level of disaggregation (Requirement #4.7)</p> <p><i>Fully met</i></p>	<p>The Secretariat's assessment is that Requirement 4.7 is fully met. The Secretariat's view is that the objective of ensuring disaggregation in public disclosures of company payments and government revenues from oil, gas and mining is fulfilled, in spite of minor gaps in project-level disclosures of relevant government revenues (less than 0.1% of relevant revenues). Most consulted stakeholders did not express particular views on progress towards this objective, although the IA considered that the objective had been broadly fulfilled given that only six material company payments to government were not disaggregated at a project level despite being levied as such.</p> <p>Cameroon's 2021 EITI Report presents reconciled financial data on government revenues disaggregated by government entity, revenue stream, company and, for most applicable revenue streams, by individual project. The report describes the MSG's agreement on a definition of project for EITI reporting purposes that is aligned with the definition in Requirement 4.7, scopes out the specific revenue streams that are levied at a project level, and confirms the lack of projects that cover several substantially interconnected agreements (e.g. licenses or contracts). The MSG's definition of project consists of individual contracts or licenses. While the majority of government revenues that are levied at a project level are disclosed by project, six material payment streams (one from SNH and five from the two material mining companies) were not disclosed disaggregated by individual project. In consultations, the IA explained that this gap was due to the lack of reporting of certain relevant payment streams by project by the three material companies. These six payments to government account for only 0.03% of total government revenues from the mining and petroleum sectors in 2021. Thus, the Secretariat considers that the objective of project-level disaggregation of all applicable government revenues has been fulfilled.</p>

<p>Data timeliness (Requirement #4.8)</p> <p><i>Fully met</i></p>	<p>The Secretariat's assessment is that Requirement 4.8 is fully met. The Secretariat's view is that the objective of ensuring that public disclosures of government revenues from oil, gas and mining are sufficiently timely to be relevant to inform public debate and policy making is fulfilled on balance, despite delays in production of previous EITI Reports. Consulted stakeholders from all constituencies expressed pride at the number of EITI Reports published in the last three years and broadly considered that the objective was achieved.</p> <p>Cameroon published its 2018 EITI Report in June 2021, its 2019 EITI Report in November 2021, its 2020 EITI Report in December 2022 and its 2021 EITI Report in October 2023. The delays in publication of the 2018 EITI Report led to the temporary suspension of Cameroon by the EITI Board right after the conclusion of its previous Validation in April 2021, although the suspension was lifted once the report was published in June 2021. Notwithstanding this delay in publishing the 2018 EITI Report, the subsequent EITI Reports have been published within the two-year timeframe dictated by Requirement 4.8. The 2021 EITI Report confirms the MSG's approval of the reporting period. The MSG has general plans to improve the timeliness of its EITI disclosures by strengthening systematic disclosures, as reflected in the 2023-2025 Cameroon EITI work plan, and a review of systematic disclosures is ongoing by the IA for the 2020 and 2021 EITI Reports as of the fourth quarter of 2023.</p>
<p>Data quality and assurance (Requirement #4.9)</p> <p><i>Fully met</i></p>	<p>The Secretariat's assessment is that Requirement 4.9 is fully met, as in the previous Validation. The Secretariat's view is that the objective of the EITI contributing to strengthening routine government and company audit and assurance systems and practices and ensuring that stakeholders can have confidence in the reliability of the financial data on payments and revenues is fulfilled, given Cameroon's EITI Report's robust methodology for data quality and assurances that were followed by all reporting entities. Consulted stakeholders from all constituencies considered that the objective was met and that the financial data in EITI Reports was reliable.</p> <p>The only systematic disclosures related to data quality and assurances in Cameroon consist of the Chambre of Accounts ('<i>Chambre des comptes</i>') website, although it only discloses audits of government accounts up to and including 2020, as well as the SNH website that has published the national oil company's full audited financial statements and audit report for the first time in 2021. Cameroon's 2021 EITI Report appears to be based on a robust methodology for data quality and assurances. There is evidence that the MSG approved the quality assurances for EITI reporting by both material companies and government entities, and an overview of statutory audit procedures is provided in the EITI Report, even if the review of audit practices could be significantly strengthened. Indeed, government officials consulted explained that the Chambre of Accounts was undertaking a financial audit of government revenues starting only with the 2022 government accounts, as it had not audited government revenues in the past. This is not described in the 2021 EITI Report. In addition, the EITI Report does not comment on the split in responsibilities between the two institutions</p>

	<p>that act as supreme audit institutions, i.e. the Chamber of Accounts and the Superior State Council (<i>Conseil Supérieur de l'Etat</i> – CONSUPE).</p> <p>The quality assurances agreed for EITI reporting explicitly reference the reporting entity's audited financial statements for the year under review. All material companies and government entities duly provide the required quality assurances, which enabled the IA to provide a statement in the EITI Report confirming the comprehensiveness and reliability of the reconciled financial data on company payments and government revenues. There is scope for strengthening Cameroon's use of its EITI reporting to provide a diagnostic of broader company and government audit and assurance practices, and to formulate recommendations for reform that could further strengthen these prevailing audit and assurance practices.</p>
New corrective actions and recommendations	
<ul style="list-style-type: none"> • To strengthen implementation of Requirement 4.1, Cameroon could work with relevant government entities and extractive companies to strengthen their systematic disclosures of government revenues and company payments in the extractive industries. Cameroon is expected to ensure that the audited financial statements of all material extractive companies are publicly disclosed. Where such audited financial statements cannot be publicly disclosed, Cameroon EITI should publish the rationale for non-disclosure and any barriers to disclosure of audited financial statements of extractive companies. • To strengthen implementation of Requirement 4.4, Cameroon could work with relevant government entities and oil transportation companies to strengthen their systematic disclosures of government revenues from the transportation of extractive commodities. Cameroon is encouraged to use its EITI reporting to discuss recent and ongoing developments related to the Chad-Cameroon oil pipeline with a view to supporting public debate on these issues of public interest. • To strengthen implementation of Requirement 4.7, Cameroon is encouraged to systematically ensure that EITI data on government revenues from the extractive industries is published disaggregated by individual project, where such revenues are levied at a project level. Cameroon could expand its project-level disclosures to other disclosures beyond payments and revenues, building on SNH's existing systematic disclosures of oil and gas production by project. • To strengthen implementation of Requirement 4.8, Cameroon is encouraged to improve the timeliness of its annual EITI disclosures of government revenues from oil, gas and mining to ensure they are sufficiently timely to be relevant to inform public debate and policy making. Cameroon could work with relevant government entities and extractive companies to strengthen their respective systematic disclosures of EITI data in order to improve the efficiency of EITI reporting. • To strengthen implementation of Requirement 4.9, Cameroon could strengthen its use of the EITI to contribute to strengthening routine government and company audit and assurance systems and practices. To do so, Cameroon could strengthen its diagnostic of the rules and practices of prevailing government and company audit and assurance practices and formulate 	

recommendations for reforms of these practices to strengthen the audit and assurance environment for extractive industry financial data in Cameroon.

Revenue management (Requirements 5.1, 5.3)

Overview of progress in the module

Systematic disclosures of budget documents have improved slightly since the previous Validation, but remains limited. The Ministry of Finance's Budget Department [website](#) has started publishing quarterly budget execution reports in addition to annual budget law and budget execution report (*loi de règlement*), although this does not include historical data prior to 2020. The Chamber of Accounts [website](#) publishes annual reports on government accounts, although only up to 2020. Cameroon has used its EITI reporting to clarify the country's budget and audit cycles to some extent, but there is scope for far greater use of EITI disclosures to shed light on issues of extractive revenue sustainability and the outlook for resource dependence.

Cameroon has used its EITI reporting to clarify the flow of funds to the Treasury, and the value and general use of extractive revenues withheld by the national oil company SNH. With SNH retaining some 54% of state oil revenues in 2021 to cover 'direct interventions' on behalf of the state primarily in national security, the materiality of extractive revenues not transiting through the Treasury is clear. The Secretariat maintains its view that the 'direct interventions' are undertaken outside of the conventional budget and expenditure cycle. While they are regularised ex post and included in the budget execution report, a large number of these remains classified as "expenditures to regularise" at the end of the year, implying that they are not properly accounted for in the budget. Thus, the Secretariat maintains its view that SNH's 'direct interventions' are quasi-fiscal expenditures (see *Requirement 6.2*). Regular publication of the government financial dashboard (TOFE) and of the SNH Mandat's audited financial statements, building on the practice for 2021, would help improve transparency on what extractive revenues are disclosed in government and SOE disclosures. There is a significant opportunity to leverage the planned reforms to the single Treasury account to strengthen systematic disclosures of government extractive revenues.

Progress by requirement and corrective actions

The detailed assessment of progress in addressing each EITI Requirement or corrective action is available from the data collection templates referenced in the annex to this report.

EITI Requirement / past corrective action and assessment	Summary of progress in addressing the EITI Requirement
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<p>Distribution of extractive industry revenues (Requirement #5.1)</p> <p><i>Mostly met</i></p>	<p>The Secretariat's assessment is that Requirement 5.1 is mostly met, as in the previous Validation. The Secretariat's view is that the objective of ensuring the traceability of extractive revenues to the national budget and ensuring the same level of transparency and accountability for extractive revenues that are not recorded in the national budget is mostly fulfilled, given Cameroon's efforts to improve transparency on extractive revenues not transferred to the single Treasury account, even if more granular information on these revenues backed by publicly accessible financial reports is still pending.</p> <p>There are only limited systematic disclosures on the distribution of the government's extractive industry revenues in Cameroon. The Ministry of Finance website publishes the annual budget law but does not appear to routinely publish the state's financial operations dashboard ('<i>Tableau des Opérations Financières de l'Etat</i>' – TOFE). The Secretariat's understanding is that the TOFE includes a specific line to cover SNH's 'direct interventions' on behalf of the state, but not for other extractive revenues that are not transferred to the single Treasury account.</p> <p>Cameroon's 2021 EITI Report lists the extractive revenues that are not recorded in the national budget, including four types of government revenues: (i) the share of proceeds from the sale of the state's in-kind revenues withheld to cover costs associated with the state's interests in oil and gas projects, (ii) bonus and royalty collected by SNH-Mandat, (iii) professional training contributions collected by SNH-Mandat, and (iv) artisanal gold mining taxes collected by CAPAM/SONAMINES. While the report confirms that revenues collected and retained by SOEs are not transferred to the single Treasury account, it explicitly categorises SNH's 'direct interventions' as not constituting quasi-fiscal expenditures given that they are reflected ex post in the government's TOFE and the budget execution report. While the International Secretariat concedes that the value of SNH's 'direct interventions' in national security expenditures on behalf of the state are reflected ex post in the government's budget documents, it echoes the IMF's view that these expenditures do not follow conventional budgetary discipline and thus considers that they should be covered as extractive revenues not transferred to the single Treasury account under Requirement 5.1 and as forms of quasi-fiscal expenditures (see <i>Requirement 6.2</i>). Most stakeholders consulted aside from development partners and some CSOs strongly rejected the categorisation of SNH's 'direct interventions' as being off-budget and as quasi-fiscal expenditures.</p> <p>The 2021 EITI Report provides some explanation for the management of these extractive revenues not transferred to the single Treasury account, albeit without reference to financial reports providing the same level of transparency and accountability on these extractive revenues managed outside the Treasury account as for revenues transiting through the single Treasury account. The EITI Report's description of the management of professional training contributions collected by SNH-Mandat is cursory and does not explain the allocation of these funds in 2021, only providing the value of oil and gas companies' payments of these contributions in 2021. Likewise, the EITI Report provides a breakdown in</p>
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	<p>the beneficiaries of SNH's 'direct interventions' on behalf of the state, but does not explain the uses of these funds beyond reference to 'national security' and does not refer to the different budget codes for SNH's 'direct interventions' (see <i>Requirement 6.2</i>). There are opportunities for further improving the transparency of extractive revenues not transferred to the single Treasury account, which could support fulfilling Cameroon's commitments to the IMF as part of its extended credit facility.</p>
<p>Revenue management and expenditures (Requirement #5.3)</p> <p><i>Not assessed</i></p>	<p>The Secretariat's assessment is that Requirement 5.3 remains not assessed, given that several encouraged aspects of this requirement remain to be addressed by Cameroon EITI. The Secretariat's view is that the objective of strengthening public oversight of the management of extractive revenues, the use of extractives revenues to fund specific public expenditures and the assumptions underlying the budget process is not fulfilled, given the lack of public disclosure of information that could further public understanding and debate around issues of revenue sustainability and resource dependence. Consulted stakeholders did not express particular views on progress towards the objective.</p> <p>There are few systematic disclosures of information on revenue management and expenditures by government entities beyond the publication of the annual budget law and quarterly budget execution reports on the Ministry of Finance's General Direction of Budget website and annual audit reports on government accounts on the Chamber of Accounts website. Cameroon's 2021 EITI Report provides a general overview of earmarked extractive revenues as well as the budget and audit cycle, with links to these systematic disclosures. The EITI Report does not describe the structure of the supreme audit institutions in Cameroon however, including the relation between the Superior State Council (CONSUPE) and the Chamber of Accounts, even though there remains some relevant information on this issue in Cameroon's last Public Expenditure and Financial Accountability (PEFA) assessment in 2017 (the next PEFA assessment is ongoing in 2023). However, the report does not provide any additional information on assumptions underpinning forthcoming years in the budget cycle and relating to projected production, commodity prices and revenue forecasts arising from the extractive industries and the proportion of future fiscal revenues expected to come from the extractive sector. There is no evidence of Cameroon discussing the implications of recent developments such as the change in operatorship of Chad's Doba oil project on the expected throughput in the Chad-Cameroon pipeline and related transit fees to the Government of Cameroon. There are significant opportunities to strengthen Cameroon's use of its EITI implementation to meet public demand for information could further public understanding and debate around issues of revenue sustainability and resource dependence.</p>
<p>New corrective actions and recommendations</p>	

- In accordance with Requirement 5.1, Cameroon should use its EITI reporting to indicate which extractive industry revenues, whether cash or in kind, transit through the Treasury accounts and which do not. Where revenues do not transit through the Treasury accounts, the allocation of these revenues must be explained, with links provided to relevant financial reports as applicable, e.g., financial reports covering the management of SNH's 'direct interventions' on behalf of the state. These disclosures should ensure that there is a commensurate level of transparency of SNH's 'direct interventions' with other conventional budgeted expenditures, i.e. disaggregated by specific budget code. To strengthen implementation, Cameroon is encouraged to draw on its 21 years (2000-2021) of GFSe-tagged extractive industry revenue disclosures to the EITI to support the Ministry of Finance's work with the International Monetary Fund in disaggregating extractives from non-extractives revenues in the government's finance statistics.
- To strengthen implementation of Requirement 5.3, Cameroon is encouraged to strengthen systematic disclosures related to its budget and audit processes, including relevant budgeting, expenditures and audit reports. Cameroon could also disclose more timely information that will further public understanding and debate around issues of revenue sustainability and resource dependence, including the assumptions underpinning forthcoming years in the budget cycle and relating to projected production, commodity prices and revenue forecasts arising from the extractive industries and the proportion of future fiscal revenues expected to come from the extractive sector.

Subnational contribution (Requirements 4.6, 5.2, 6.1)

Overview of progress in the module

There are no direct subnational payments by extractive companies in Cameroon, although subnational transfers of extractive revenues and socio-environmental contributions of extractive companies remain topics of robust public interest in the country. In the absence of systematic disclosures of information on subnational transfers and socio-environmental contributions, Cameroon's EITI Reports are the only public source of information on these important aspects of extractive industry governance. Cameroon has used its EITI disclosures to identify inefficiencies in subnational transfers of extractive revenues, although more work is needed to identify discrepancies between the rules and practices of subnational transfers related to additional communal transfers ('Centimes Additionnels Communaux') in particular. The follow-up on past EITI recommendations to improve disbursements of subnational transfers of artisanal mining revenues is an important achievement however. Cameroon has continued to use its EITI reporting to disclose some mandatory and voluntary social expenditures, although these disclosures do not appear to be yet comprehensive in the absence of a complete review of contractual requirements for extractive companies to make such social expenditures.

Progress by requirement and corrective actions

The detailed assessment of progress in addressing each EITI Requirement or corrective action is available from the data collection templates referenced in the annex to this report.

EITI Requirement / past corrective action and assessment	Summary of progress in addressing the EITI Requirement
<p>Subnational payments (Requirement #4.6)</p> <p><i>Not applicable</i></p>	<p>The Secretariat's assessment is that Requirement 4.6 remains not applicable, as in the previous Validation. The Secretariat's view is that the objective of enabling stakeholders to gain an understanding of benefits that accrue to local governments is not applicable in Cameroon during the period under review. Consulted stakeholders confirmed this view.</p> <p>Cameroon's 2021 EITI Report confirms that extractive companies are not required to make any direct payments to subnational state entities. The Secretariat's understanding is that there have been no reforms of the fiscal regime for mining or petroleum that introduced any new direct subnational payments since the period review in the previous Validation.</p>
<p>Subnational transfers (Requirement #5.2)</p> <p><i>Mostly met</i></p>	<p>The Secretariat's assessment is that Requirement 5.2 is mostly met, as in the previous Validation. The Secretariat's view is that the objective of enabling stakeholders at the local level to assess whether the transfer and management of subnational transfers of extractive revenues are in line with statutory entitlements is mostly fulfilled, given gaps in disclosures of executed subnational transfers of two of the three types of transfers. Consulted stakeholders from all constituencies highlighted the improvements in execution of subnational transfers of (artisanal) mining revenues as a direct impact of EITI implementation, given that EITI disclosures had consistently highlighted the lack of distribution of subnational transfers as a governance gap, with related recommendations. Most consulted stakeholders considered the objective broadly met, despite the gaps in disclosures of calculations of expected subnational transfers by beneficiary subnational government for two of the three types of subnational transfers. While acknowledging the important advances in receiving more subnational transfers of extractive revenues, local government representatives consulted considered that they did not have sufficient visibility on what they were owed in line with the statutory revenue-sharing formula.</p> <p>There are no systematic disclosures of information on subnational transfers of extractive revenues by government entities. There are three types of subnational transfers of extractive revenues in Cameroon: transfers of a share of (i) ad valorem tax and extraction tax, (ii) additional communal transfers ('<i>Centimes Additionnels Communaux</i>'), and (iii) ad valorem tax on artisanal mining. Cameroon's 2021 EITI Report provides a greater level of transparency on the first type of subnational transfers than on the other two. The general revenue sharing formula is provided for all three types of transfers.</p> <p>With regards to subnational transfers of a share of <u>ad valorem tax and extraction tax</u>, the 2021 EITI Report provides the notional and actual value of subnational transfers per company, but not by individual beneficiary local government entity. Given that mining companies may hold several licenses in</p>

	<p>different local government areas, it is likely that the data on subnational transfers is not effectively disaggregated by beneficiary local government, as confirmed by the IA in consultations. The IA noted that it would be possible to publish more disaggregated data (by beneficiary) on these transfers. The EITI Report notes that the data on notional and actual subnational transfers covers only revenues from tax offices (branches of the DGI) that are connected to the tax office's 'MESURE' system but does not include transfers related to extractive revenues collected by DGI branches in more remote parts of the country that are not connected to 'MESURE'. In consultations, the IA explained that the vast majority of extractive companies were registered in Yaoundé and Douala, whose tax offices were connected to 'MESURE', and thus that the revenues collected by non-connected DGI branches were not considered material. Indeed, the IA explained that only some artisanal and semi-mechanised miners may be registered in more remote local government areas with DGI branches that were not connected to 'MESURE'.</p> <p>With regards to subnational transfers of a share of <u>additional communal transfers ('Centimes Additionnels Communaux')</u>, the 2021 EITI Report provides only the aggregate value of extractive revenues that should have been transferred to eligible local governments in 2021 according to the revenue-sharing formula, but not disaggregated by individual beneficiary. The report explains that data on the value of these subnational transfers that were executed in 2021 was not provided, and thus it was not possible to identify discrepancies between notional and actual subnational transfers of this type.</p> <p>With regards to subnational transfers of a share of <u>ad valorem tax on artisanal mining</u>, the 2021 EITI Report provides the value of subnational transfers executed in 2021, disaggregated by individual beneficiary. Yet the report explains that this data was sourced from Ministry of Finance disclosures that were not corrected by the IA despite the fact it identified errors in the total figures communicated by the Ministry. State officials consulted confirmed that there were errors in the disclosures in the 2021 EITI Report but that these would be corrected in the next EITI Report. The report does not provide an assessment of whether the subnational transfers executed in 2021 were in line with the value of transfers according to the revenue-sharing formula. In consultations, state officials explained that the EITI Report contained the calculations of subnational transfers related to the ad valorem tax on artisanal mining collected by the CAPAM until Q2 2021, but not those collected by SONAMINES from Q3 2021 onwards. The initial transfers related to SONAMINES' collections of this artisanal mining tax for Q3 2021 onwards were only made in October 2023.</p> <p>Thus, the Secretariat finds that it is only possible to identify discrepancies in the value of executed subnational transfers in 2021 for one of the three types of transfers.</p>
<p>Social and environmental</p>	<p>The Secretariat's assessment is that Requirement 6.1 is mostly met. The Secretariat's view is that the objective of enabling public understanding of extractive companies' social and environmental contributions and providing a</p>

<p>expenditures (Requirement #6.1)</p> <p><i>Mostly met</i></p>	<p>basis for assessing extractive companies' compliance with their legal and contractual obligations to undertake social and environmental expenditures is mostly fulfilled, given concerns over the comprehensiveness of disclosures of social and environmental payments to government. Consulted stakeholders did not express particular views on the objective aside from the IA who considered the disclosures comprehensive. One industry representative stated that certain oil and gas contracts did contain mandatory social expenditure requirements, as part of 'social investments'.</p> <p>There are no systematic disclosures of social expenditures or environmental payments and expenditures by mining and petroleum companies operating in Cameroon. While the SNH website has published annual reports up to and including 2020, these do not detail social or environmental expenditures.</p> <p>With regards to <u>social expenditures</u>, the 2021 EITI Report confirms the lack of effective mandatory social expenditure requirements in either the petroleum or mining sectors, although it confirms mandatory social expenditures required of COTCO in the oil transportation sector. While the IA's review of legal and contractual provisions in the petroleum sector was limited to a review of the 1999 Petroleum Code and the production sharing contract (PSC) template, in consultations the IA considered it highly unlikely that any of the active PSCs contained any requirements for social expenditures and expressed strong confidence in its finding that there were no mandatory social expenditures in the upstream petroleum sector. However, one oil industry representative stated that some oil and gas contracts had requirements for mandatory social expenditures ('social investments'), which would imply that disclosures of social expenditures in the 2021 EITI Report are not comprehensive. The Secretariat thus has concerns over the comprehensiveness of disclosures of mandatory social expenditures, which cannot be confirmed independently given the confidentiality of oil and gas contracts.</p> <p>In mining, the EITI Report explains that the 2016 Mining Code includes requirements for mining companies to include a local content plan covering social expenditures in their mining contract, but noted that the lack of an implementing decree for the 2016 Mining Code meant that these legal provisions were not effective to date. The IA's review of mining contracts identified social expenditure requirements in the mining contracts with CAMIRON and GEOVIC, but the EITI Report explains that these contracts were not yet active in 2021. Thus, the only form of mandatory social expenditures in Cameroon's extractive industries appears to be limited to the oil transportation sector. The 2021 EITI Report provides the value of COTCO's mandatory social expenditures disaggregated by beneficiary, confirming that these were made in cash (not in-kind) and the identity of all non-government beneficiaries. While all material companies were requested to report their voluntary social expenditures in 2021, only four oil and gas companies reported any such expenditures, disaggregated to levels mandated under Requirement 6.1.a.</p> <p>With regards to <u>environmental payments and expenditures</u>, the 2021 EITI Report provides a list of such payments and expenditures without clearly</p>
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	<p>distinguishing environmental payments (such as fees for environmental permits) from environmental expenditures to non-government beneficiaries (such as provisioning and contributions to environmental rehabilitation). Despite being requested to disclose any environmental payments to government, none of the material mining and petroleum companies disclosed any such payments. However, the Ministry of Environment, Protection of Nature, and Sustainable Development (MINEPDED) was included in the scope of EITI reporting for the first time in 2021, and it disclosed a total of XAF 11m in environmental revenues collected from four mining companies that were not considered material for EITI reporting in 2021. While material companies did not disclose any other form of environmental expenditures, the EITI Report discloses three oil and gas companies' provisioning of funds for environmental rehabilitation within their own accounts, although these were not transferred to environmental rehabilitation funds in 2021. The Secretariat considers that Cameroon EITI has undertaken some efforts to disclose environmental payments to government, but considers that there are opportunities to strengthen the comprehensiveness of such disclosures in future EITI reporting cycles through close consultations with MINEPDED and material extractive companies.</p>
New corrective actions and recommendations	
<ul style="list-style-type: none"> • In accordance with Requirement 5.2, Cameroon should ensure public disclosure of all subnational transfers of extractive revenues, including all extractive revenues regardless of the materiality of companies from which the revenues are collected. These disclosures should include the transfer amount calculated in accordance with the relevant revenue-sharing formula and the actual amount that was transferred between the central government and each relevant subnational entity entitled to receive subnational transfers of extractive revenues in the year(s) under review. • In accordance with Requirement 6.1, Cameroon should ensure public disclosures of all social expenditures by extractive companies mandated by law, regulation or contract, where such payments are material. Cameroon should ensure public disclosures of all payments by extractive companies to the government related to the environment mandated by law, regulation or contract, where such payments are material. To strengthen implementation in light of significant public interest, Cameroon is encouraged to consider ensuring public disclosure of discretionary social and environmental expenditures and transfers by extractive companies, where material. 	

Background

Overview of the extractive industries

An overview of the extractive industries is accessible on the [country page](#) of the EITI webpage for Cameroon.

History of EITI implementation

The implementation history is accessible on the [country page](#) of the EITI webpage for Cameroon.

Explanation of the Validation process

An overview of the Validation process is available on the EITI website.⁶ The [Validation Guide](#) provides detailed guidance on assessing EITI Requirements, while the more detailed [Validation procedure](#) includes a standardised procedure for undertaking Validation by the EITI International Secretariat.

The International Secretariat's country implementation support team include Ahmed Zouari and Nassim Bennani, while the Validation team was comprised of Alex Gordy and Christina Berger. The internal review for quality assurance was conducted by Nassim Bennani, Esteban Manteca and Bady Baldé.

Confidentiality

The detailed data collection and assessment templates are publicly accessible, on the internal Validation Committee page [here](#).

The practice in attribution of stakeholder comments in EITI Validation reports is by constituency, without naming the stakeholder or its organisation. Where requested, the confidentiality of stakeholders' identities is respected, and comments are not attributed by constituency. This report is shared with stakeholders for consultation purposes and remains confidential as a working document until the Board takes a decision on the matter.

Timeline of Validation

The Validation of Cameroon commenced on 1 October 2023. A public call for stakeholder views was issued on 1 July 2023. Stakeholder consultations were held virtually on 23 October – 3 November 2023. The draft Validation report was finalised on 3 January 2024. Following comments from the MSG expected on 31 January 2024, the Validation report will be finalised for consideration by the EITI Board.

⁶ See <https://eiti.org/validation>

Resources

- Validation data collection file – [Stakeholder engagement](#)
- Validation data collection file – [Transparency](#)
- Validation data collection file – [Outcomes and impact](#)

Annexe A: Assessment of Requirement 1.3 on civil society engagement

Methodology

Due to concerns expressed by stakeholders related to the enabling environment for civil society engagement in the EITI, the International Secretariat's Validation team has conducted a detailed assessment of Cameroon's adherence to the EITI Protocol: Participation of civil society.⁷

The assessment follows the Validation Guide, which defines guiding questions and related evidence that should be considered in cases where there are concerns about potential breaches of the civil society protocol.⁸ For contextual purposes, the Validation provides an overview of the broader enabling environment for civil society participation in country's extractive sector. The assessment seeks to establish whether legal or practical restrictions related to the broader enabling environment have in practice restricted civil society engagement in the EITI in the period under review. It focuses on the areas where there are concerns regarding adherence with the civil society protocol.

A call for stakeholder views on progress in EITI implementation was launched on DATE, in accordance with the Validation procedure. The assessment draws on the information provided in responses to that call for views, the Stakeholder engagement file, and stakeholder consultations.

Overview of broader environment for civil society engagement

There were around 56,000 associations registered in Cameroon as of 2022, including 40 international CSOs and 50 registered non-governmental organisations (NGOs) according to the 2021 [CSO Sustainability Index](#) for Cameroon, alongside an estimated 500,000 grassroots community organisations, private associations, common initiative groups and others that are often unregistered. The media landscape is similarly diverse, with nearly 700 newspapers and journals, around 100 television channels, 150 radio stations and 39 online media for a population of 26m according to press [reports](#).

Cameroon's ranking in the [Freedom in the World](#) has declined slightly from 18 points (out of 100) in 2020 to 15 points in 2023, albeit consistently ranked as 'not free' throughout this period. The international NGO [CIVICUS](#) has continued to rank Cameroon's civic space as 'repressed' throughout this period (since 2016). Assessments by [Freedom House](#) and [CIVICUS](#) highlight repression of public demonstrations and restrictions on press freedom reflected in the murder of several journalists critical of the government and the suspension of certain media. Reporters without Borders' ([RsF](#)) ranking of press freedom in Cameroon had significantly improved from a low base of 134th of 180 countries in 2020 to 118th in 2022, before sharply declining to 138th in 2023. Cameroon's ranking in the Global Expression [Report](#) published by international NGO

⁷ <https://eiti.org/document/eiti-protocol-participation-of-civil-society>.

⁸ <https://eiti.org/document/2021-eiti-validation-guide>.

Article 19 has significantly deteriorated from ‘restricted’ in 2016 to ‘highly restricted’ in 2022, at 113th of 131 countries assessed.

Cameroon has continued to face security challenges in the country’s north due to ongoing attacks by Islamist terrorist group Boko Haram and in the western Anglophone regions due to conflict with separatist groups. Press and academic articles such as the Coventry University Research Centre’s 2021 [report](#) indicate that a total of 3000 individuals have been killed and over 750,000 people have been internally displaced in the Anglophone conflict since 2017. There have been reports of attacks on civilians by both separatists and state security forces according to the Human Rights Watch [page](#) on Cameroon. In particular, the government has acknowledged the army’s involvement in a massacre in Ngarbuh in February 2020, although the prosecution of the 21 individuals accused of being implicated has been ongoing since 2021 according to a Human Rights Watch [report](#). Tensions have reportedly risen in the two Anglophone regions since 2021, with increased violence against civilians by both separatists and state security forces according to the International Crisis Group’s [coverage](#) of Cameroon. In October 2021 for instance, a crowd of protesters attacked and killed a policeman after he allegedly shot at a vehicle and killed a schoolgirl in Buea according to the 2021 [CSO Sustainability Index](#) for Cameroon. Attempts at conflict resolution have been unsuccessful to date, with a ‘Major National Dialogue’ and the granting of special status for the two Anglophone regions in 2019 not leading to a reduction in tensions. The Government of Canada has [led](#) facilitation of a new peace initiative in 2023.

There has been limited progress in establishing legal and regulatory protections for civil society, including human rights defenders in particular, since the previous Validation. Following Cameroon’s noting of recommendations from its last UN Universal Periodic Review (UPR) [report](#) in 2018 for the adoption of specific legislation to protect human rights defenders, civil society groups have publicly [advocated](#) for the development of a law to protect human rights defenders since 2020. Several CSOs developed a draft bill for the protection of human rights defenders in early 2022, which was submitted to the Senate by Senator Pierre Flambeau Ngayap as [reported](#) in the national press. However, the status of the bill is unclear and does not appear to have progressed through the Senate, according to a 2023 [report](#) by Nkafo Policy Institute.

Expression

While Cameroon’s Constitution guarantees freedom of expression and of the press, certain laws restrict certain types of public expression. The 2014 Law on the Repression of Terrorist Acts (Law [2014/028](#)) introduced prison sentences of up to 20 years for expressing public opinions deemed to affect public order or interpreted as acts of terrorism. The law has been criticised by international NGOs for allowing the government discretion in defining the term “terrorism”, and for allowing military courts to judge such cases. Meanwhile the 2016 Penal Code (Law [2016/007](#)) maintained the previous Penal Code’s criminalisation of defamation, with sanctions of up to six months’ imprisonment and fines of up to XAF 2m for expressing public views that attack a person’s honour or consideration without adequate evidence, provisions that explicitly cover journalists. The Committee to Protect Journalists ([CPJ](#)) has criticised Cameroon’s “*opaque judicial system that includes the use of military tribunals to prosecute journalists*”. There have

been several uses of these legal provisions to prosecute journalists in recent years, although none of these cases appears to explicitly relate to the EITI process or public debate on extractive industry governance. There are a total of over 100 individuals incarcerated for protesting as of 2022 according to estimates from [CIVICUS](#), including journalist TSI Conrad imprisoned for 15 years by sentence of a military court in 2017 following his coverage of protests in the Anglophone areas, as well as Dorgelesse Nguessan imprisoned for five years for attending a protest organised by the *Mouvement pour le Renaissance du Cameroun*. A journalist and civil society activist, Emmanuel Mbombog Mbog Matip, was released from prison in December 2021 when he was acquitted after spending 16 months incarcerated as reported in a [RsF article](#) in December 2021. [CIVICUS](#) reports that Mr Matip was investigating two stories involving senior government officials in an alleged coup d'état plot and the theft of luxury cars when he was arrested. [Press reports](#) indicate that there were five journalists held in the Kondengui Central Prison alone as of May 2023, of which four are held under the Anti-Terror Law in relation to the Anglophone crisis. The [RsF report](#) on Cameroon raises concerns over frequent instances of journalists in the Anglophone regions being accused of complicity with separatist forces. There have been repeated calls from national and international CSOs for revisions to the 2014 Anti-Terror Law, including in an [open letter](#) to President Biya from 27 CSOs in February 2022. In November 2021, the European Parliament passed a [resolution](#) expressing concern over the human rights situation in Cameroon and calling for a halt in military courts trying civilians.

There have been reports of attacks on and harassment of journalists in recent years that have contributed to Cameroon's media being characterised as one of the most dangerous in Africa by [RsF](#), with the Committee to Protect Journalists ([CPJ](#)) accusing the government of being the second-worst jailer of journalists on the continent. The 2023 [Freedom in the World](#) assessment of Cameroon raised concerns over the actions of the media regulator, the National Communication Council (CNC), which is accused to have “*a history of harassing journalists*” with several journalists receiving sanctions such as temporary suspensions in 2022. The US State Department's 2022 [report](#) on human rights in Cameroon has highlighted authorities' threats to journalists and CNC suspensions of journalists and publishers for expressing views that are deemed inconsistent with government policy. For instance, the CNC [suspended](#) two journalists (Séverin Tchounkeu and Cédric Noufele) for one month in April 2022 over accusations that the two had not properly lead a panel discussion on a teachers' strike in February 2022, which the regulator considered was “*likely to lead to the amplification of a potentially explosive social demands*”. The CNC also [accused](#) Tchounkeu of making “*unfounded accusations offensive to republican institutions*” during a subsequent broadcast in March 2022.

The [RsF ranking](#) of Cameroon in 2023 raises concerns over threats to journalists including verbal and physical attacks, arbitrary detentions and arrests, gag orders, kidnappings and assassinations that are attributed to both state security services and armed groups. In particular, the murder of two journalists in early 2023 drew significant national and international media attention. In January 2023, journalist, anti-corruption activist and director of Radio Amplitude Arsène Salomon Mbani Zogo (known as Martinez Zogo) was found dead and his body mutilated five days after his kidnapping outside of a police station in the capital Yaoundé. In February 2023, Orthodox priest and radio host Jean Jacques Ola Bebe was also found dead in Yaoundé, which followed reports of his receiving threats that he suspected were from the authorities after

his calls for justice for Martinez Zogo, according to a February 2023 [update](#) from Human Rights Watch. The UN Office for the High Commissioner for Human Rights expressed significant concern over these killings in a February 2023 [press release](#). Investigations into the killing of Martinez Zogo led to the indictment and arrest of prominent businessman Jean Pierre Amougou Belinga and senior government officials such as the head of the Directorate General of External Research (DGRE) intelligence agency, Léopold Maxime Eko Eko according to a May 2023 [report](#) from the United Nations Regional Office for Central Africa.

There have also been reports of non-lethal attacks on journalists since the previous Validation. The incident that garnered the most national and international media attention was that of journalist Paul Chouta, known as a critic of the government who in March 2022 was kidnapped and attacked by unidentified assailants, who left severe injuries in a case that was widely covered including in the 2023 [Freedom in the World](#) ranking. Previously the target of violent attacks in 2019 and sentenced for defamation and spreading false news in May 2021 (after his arrest in 2019 and 27 postponements of his court case according to [CIVICUS](#)), Paul Chouta reported that his unidentified assailants in 2022 had told him that he was stubborn and has not learned his lesson, according to a Committee to Protect Journalists (CPJ) [report](#). Since May 2023, Mr Chouta has been living in Germany supported by a grant from RsF, according to media [reports](#). United Nations Human Rights Spokesperson Seif Magango expressed deep concern over the safety of journalists in Cameroon in May 2023, noting reports of three Cameroonian journalists having received credible threats in January 2023 alone, according to national press [reports](#).

There have been allegations of self-censorship on the part of the media and civil society in Cameroon by international media and civil society organisations such as the [BBC](#) and [RsF](#), as well as foreign government such as the [United Kingdom](#) and the [United States](#). In particular, [RsF](#) has argued in 2023 that it is “*impossible*” for a media to adopt an independent editorial policy that is critical of government interests or representatives without being exposed to significant threats and harassment, fuelling a climate of self-censorship and resulting in most media outlets aligning with the views of government authorities. The US State Department’s 2022 [report](#) on human rights in Cameroon noted that journalists practiced self-censorship particularly if the CNC had previously suspended their media. The 2023 edition of [Freedom in the World](#) argued that Cameroonians avoid public expression of sensitive political issues, such as the potential return to a federal system with autonomy for Anglophone regions, for fear of reprisals. A Coventry University Research Centre [report](#) on civic space in Cameroon in 2021 reported some civil society activists’ perception that subnational government entities at the sub-district, district and regional levels prevented CSOs from publicly sharing information on people in communities affected by violence in the Anglophone regions.

Within the constrained broader context of freedom of expression and of the press, civil society has made efforts to create some space to discuss issues of extractive industry governance. For instance, the MSG’s ‘Stakeholder engagement’ template listed reports and press clippings reflecting civil society’s public expression on issues including artisanal and small-scale mining (such as [here](#), [here](#) and [here](#)), the terms of the SINOSTEEL mining contract ([here](#)), the Glencore corruption affair ([here](#)) among other issues, with a more comprehensive list of references in the

Validation template. There is little evidence of public expression by civil society on other extractive issues considered sensitive, such as SNH's 'direct interventions' of national security expenditures on behalf of the state. While there is evidence of public expression by civil society on several issues deemed sensitive, the public statements on issues such as the Glencore affair have tended to focus on asking questions rather than expressing critical statements about the government's management of the extractive industries, or its response to allegations in the Glencore affair. Consulted stakeholders from all constituencies noted that it was important for CSOs to behave "responsibly" in not making public critical allegations against government officials without conclusive evidence. Opinions of consulted stakeholders were split over whether the broader civic space developments had an impact on the EITI process, with some CSOs considering that arrests and deaths of journalists were entirely unrelated to the EITI process, while other CSOs considered that these incidents had a chilling effect on CSOs' ability to express critical views about the government. Most consulted CSOs considered that there were no laws prohibiting specific types of public expression, but that CSOs were often concerned about the potential consequences of expressing critical views publicly. Some CSOs consulted considered that there was a tendency for caution on the part of CSOs on their public expressions about extractive industry governance. Other CSOs considered that growing public debate about issues such as the Glencore affair and the SINOSTEEL contract demonstrated that CSOs were able to speak freely about all topics, although no explanation was provided for the absence of public debate on issues such as SNH's 'direct interventions' in national security expenditures on behalf of the state. Some CSOs consulted considered that civil society could only engage in critical public debate once the government had given approval to discuss such issues.

Within a broader environment for public expression and the media that remains constrained according to international civic space indicators, the Secretariat's view is that civil society substantially engaged in the EITI process have followed a pattern of caution in their public statement, with different statements made in public than in confidential bilateral conversations. It is important to note that most stakeholders consulted for this Validation, including from civil society, rejected the notion that civil society could be self-censoring about any issue related to the extractive industries, with some noting that limited public debate about the oil sector was due to civil society's technical capacity constraints rather than government constraints on freedom of expression. However, the Secretariat's assessment is that civil society representatives are not able to speak freely in public about all issues covered by the EITI process, such as allegations of corruption in the mining, oil and gas sectors, without fear of reprisal from the state. This is considered a breach of the EITI protocol: Participation of civil society related to freedom of expression.

Operation

The legal and regulatory environment for civil society has not changed since the previous Validations, still based primarily on Law No. 90/053 of 1990 on freedom of association but also including other laws governing different types of CSOs. While there is a regime for NGOs, in practice very few (around 50 nationwide) have registered as NGOs to date, while most others remain associations under the regime of declaration. While the process for registering NGOs is usually simple and efficient, the 2021 [CSO Sustainability Index](#) for Cameroon reports:

“organizations working on governance, anti-corruption, and human rights often encounter delays or difficulties in obtaining registration receipts or can be denied registration arbitrarily, giving rise to the perception that registering authorities do not apply the laws in a fair and consistent manner.”

Nonetheless, the government is reported to practice “administrative tolerance” by allowing organisations to operate semi-legally according to the CSO Sustainability Index. The law allows the Ministry of Territorial Administration (MINAT) to dissolve any organisation that breaches public order or state security, although the 2021 [CSO Sustainability Index](#) reports that MINAT had never done so. In practice all CSOs engaged in the broader constituency on EITI appear to be duly registered and there have been no reports of administrative delays in any registration related to CSOs working on EITI issues. The CSO Sustainability Index concludes that CSOs are free to operate and express critical views, provided these are consistent with the organisation’s mission, and that CSOs do not get involved in politics or issues deemed related to state security, territorial integrity, and incitement to revolt (see *expression*).

While Law 90/053 of 19 December 1990 remains the primary legal instrument for regulating civil society organisations in Cameroon and maintains statutory rights for the government to deny access to funding to organisations not formally registered as non-governmental organisations (NGOs), these provisions continue not to be applied in practice, as in the periods reviewed in the previous Validations. A new legal reform in Law 2021/023 of 16 December 2021 introduced a new type of civil society groupings (interprofessional organisations) allowing professional organisations to group together and access public funding according to the 2021 [CSO Sustainability Index](#) for Cameroon, although implementing regulations for this legal reform are still pending as of 2023.

There do not appear to be barriers to CSOs accessing foreign and domestic funding for their activities, and there is evidence that CSOs substantially engaged in the EITI have continued to access foreign funding since 2021, including from the United Kingdom’s Foreign, Commonwealth and Development Office (such as CED Cameroon [in 2021](#)), PWYP International (such as CED Cameroon [in 2022](#) and RELUFA [in 2022](#)), the European Union (such as RELUFA [in 2022](#) and [in 2023](#)), NORAD (such as Tax Justice Network Africa [in 2021](#)), the Alliance for Responsible Mining (such as CRADEC [in 2021](#)), the Kimberley Process Civil Society Coalition (such as RELUFA [in 2022](#)), among others. Independent civil society reports and stakeholder consultations however highlighted challenges in the availability of foreign funding for CSOs working on extractive issues, with the 2021 [CSO Sustainability Index](#) for Cameroon highlighting the deterioration in civil society’s financial viability given the suspension of some donors’ support given changes in donor priorities. There has also been a reported tendency for donors to support a small number of larger CSOs, according to a summary [note](#) from a Civil Society - Donor Roundtable Discussion in Cameroon in May 2023.

Association

There continue to be constitutional guarantees for freedom of association in Cameroon, as in the period reviewed in the previous Validation. However, in practice, there continue to be administrative restrictions to civil society organising public meetings and demonstrations. According to Law 90/055, organisers of public meetings and events are required to obtain permits from the government for public events following prior notification. The 2021 [CSO Sustainability Index](#) for Cameroon noted that the interpretation of this law provided significant discretion to individual government officials considering specific requests from civil society. The 2023 [Freedom in the World](#) report on Cameroon noted that the government continued to ban and violently disperse public events considered anti-government in 2022, particularly those organised by the political opposition movement. In the Anglophone regions in particular, independent research such as a Coventry University Research Centre 2021 [report](#) on civic space in Cameroon has noted that civil society organisations operating in Anglophone region appear never to be issued with authorisations to carry out their public activities by government. While the Anglophone regions host significant extractive activities, including oil and gas projects, the reported instances of denial of civil society requests to organise public events in the Anglophone regions do not appear to be explicitly linked to public debate on the extractive industries, nor involve CSOs substantially engaged in the EITI process.

In practice, the MSG's 'Stakeholder engagement' template provides an inventory of events organised by civil society on issues directly related to the EITI process and linked to broader extractive industry governance issues. Most events have consisted in press conferences, public workshops and capacity building events, rather than public demonstrations or rallies. The OSCC-ITIECAM platform established in 2018 as the key channel for organising civil society's engagement in the Cameroon EITI process continued to act as the constituency's key coordination mechanism in the period under review. Several civil society stakeholders consulted highlighted the expansion of the OSCC-ITIECAM platform from a membership of 10-15 organisations in the last Validation to around 35 organisations currently. The OSCC-ITIECAM steering committee is composed of three representatives from the Cameroonian PWYP Coalition, World Youth Dynamic (DMJ) and Mining Best Practices. While Article 22 of the Civil Society Accountability Code that established the OSCC-ITIECAM in 2018 planned for the nomination of a constituency spokesperson, this individual has not been named to date and the constituency has rather appointed spokespersons on an ad hoc basis based on need. Opinions of CSOs consulted were split on the necessity of appointing a permanent spokesperson, with several CSOs considering that such an appointment was necessary to further improve the broader constituency's engagement in the EITI and to strengthen the constituency's voice in the EITI process. There is some evidence that some civil society MSG members coordinate with the broader constituency through the OSCC-ITIECAM WhatsApp group and occasional newsletter and group emails (see *engagement*). However, several CSOs consulted considered that the functioning of the OSCC-ITIECAM platform should be improved, given that the platform was not receiving the funding intended from members and thus was not holding the activities it had planned to. A May 2023 position note by the CSO GAD, whose views were confirmed by many CSOs consulted, noted that only two of the eight CSO representatives on the MSG (CRADEC and AGNR) provided feedback to the broader constituency on EITI developments, with only ad hoc circulation of documents. Many CSOs not directly represented on the MSG considered that they were only consulted occasionally by the few civil society MSG members that had been nominated

by the broader constituency (e.g. from CRADEC), but that they did not consider to be sufficiently involved in the EITI process.

Engagement

There is no indication of any legal, regulatory or administrative barriers to civil society's ability to engage in all aspects of EITI implementation in the period under review. Civil society representatives regularly and consistently attend MSG meetings and conduct some analysis of EITI Reports. However, active engagement in MSG discussions, outreach and dissemination appears to be driven by organisations that have been nominated by their broader constituency to represent them in the EITI process, rather than organisations that have been statutory named in the EITI Decree to represent their specific organisations in the EITI process.

Thus, in practice, there appear to be factors that weaken genuine civil society organisations' ability to fully engage in all aspects of the EITI process given weaknesses in the constituency's representation in the EITI process. Several independent assessment of broader civic space in Cameroon, such as the 2023 [Freedom in the World](#) report and a summary [note](#) from a Civil Society - Donor Roundtable Discussion in Cameroon in May 2023, have highlighted instances of CSOs and civil society activists being co-opted by the government, as well as instances of the creation of fraudulent or "fake" civil society organisations.

In the context of the EITI, only two of the eight MSG seats reserved for the civil society constituency are earmarked for members to be appointed by their broader constituency, namely two CSOs working on extractive industry governance and a representative of the Cameroonian PWYP coalition. The other five MSG seats are reserved for one representative each from the three main religious communities' organisations in Cameroon (the National Episcopal Conference, the Protestant Churches Council and the Islamic Cultural Association), the president of the Cameroonian chapter of Transparency International, and the president of the Union of Journalists of Cameroon. The Secretariat understands that the current MSG members representing the Islamic Cultural Association and the Protestant Churches Council currently work for (or have recently retired from) the Ministry of Finance and the Office of the Prime Minister respectively. There were different views among different CSOs consulted over whether such government employment constituted a conflict of interest, although several CSOs noted that current employment with either government or extractive companies was a disqualifying factor to seek nomination to the MSG under the civil society constituency's accountability code that established the OSCC-ITIECAM platform in 2018.

The majority of examples of civil society engagement in the EITI process and public debate on extractive industry governance provided in the MSG's 'Stakeholder engagement' and 'Outcomes and impact' templates relate to a handful of CSOs substantially engaged in the EITI, such as CRADEC, CED, RELUFA and PWYP Cameroon. There are also some examples of analytical reports by Transparency International's Cameroonian chapter. However, there are no examples of tangible engagement in outreach, dissemination, analysis and advocacy on the part of other organisations directly represented on the MSG due to their appointment by the EITI Decree. Review of MSG meeting minutes indicates that civil society's engagement in EITI discussions is

driven by the CSOs that are more accountable to their broader constituency given the manner in which they were nominated to the MSG. Indeed several representatives of organisations named in the EITI Decree have sat on the MSG for over ten years without change. Several CSOs consulted not on the MSG considered that broader civil society engagement was weak due to the lack of EITI or other CSO activities in mining regions, particularly in the east of the country. The Secretariat considers that, while there is no evidence of government constraints on the civil society constituency's ability to engage in the EITI process, significant weaknesses in the constituency's organisation and the continued presence of CSOs without clear accountability mechanisms to the broader constituency has weakened civil society's engagement in the EITI process since January 2021.

Access to public decision-making

There do not appear to be any barriers to civil society using the EITI process to discuss extractive industry issues of relevance for public debate and public policy making. In practice, it appears that CSOs – particularly those nominated in an open, fair and transparent manner to represent the constituency on the MSG – are able to add to the agenda of Cameroon EITI MSG meetings and to use the EITI process to follow up on issues of priority for their constituency. Thus, the MSG's 'Stakeholder engagement' and 'Outcomes and impact' templates list several public events organised by CSOs to push for more progress on specific issues such as contract and beneficial ownership transparency through the EITI process. Minutes of MSG meetings indicate that several CSO MSG members raise issues of public interest and ask for follow-up on relevant EITI recommendations, including related to contract and beneficial ownership transparency as well as the Glencore affair.

However, several CSOs consulted considered that there were weaknesses in the MSG's capacities to effectively oversee the EITI process given capacity constraints within the Cameroon EITI Secretariat and the lack of attendance at MSG meetings by the MSG Chair, Minister of Finance Motaze. While consulted civil society representatives' views were split over this issue, some CSOs considered that MSG decisions were not always implemented given the Cameroon EITI Secretariat's staffing challenges and the fact that the MSG Chair and Minister of Finance did not always implement the MSG's decisions. Several examples of slow or in-existent follow-up on MSG decisions were provided, such as the long delays in concluding employment contracts of Cameroon EITI Secretariat staff. The Secretariat considers that civil society's ability to use the EITI process to access public decision making remains only partial given weaknesses in the accountability of a majority of MSG members representing the constituency and broader weaknesses in the MSG's governance (see *Requirement 1.4*).

Assessment

The Secretariat's assessment is that Requirement 1.3 is partly met, which is a regression since the previous Validation. The Secretariat's view is that the objective of full, active and effective civil society engagement in the EITI process is not fulfilled, given weaknesses in the constituency's engagement in the EITI and challenges in its ability to use the EITI process to influence public decision-making linked to a lack of accountability in a majority of civil society's

representatives on the MSG and broader MSG governance challenges (see *Requirement 1.4*). The Secretariat also considers that the objective of an enabling environment for civil society engagement in the EITI process and public debate on extractive industry governance is not fulfilled, given breaches of the EITI protocol: Participation of civil society related to freedom of expression.

Cameroon's scores in international civic space rankings have remained low in the period under review. The continued security challenges in the Anglophone western regions and linked to Boko Haram in the north have provided a challenging context for civic space in those areas in particular. Civil society has developed a draft bill for the protection of human rights defenders that was submitted to the Senate in early 2022, but the status of the bill remains unclear as of October 2023.

In terms of expression, within a broader environment for public expression and the media that remains constrained, the Secretariat's view is that civil society substantially engaged in the EITI process have followed a pattern of caution in their public statement, with different statements made in public than in confidential bilateral conversations. Civil society representatives do not appear to be able to speak freely in public about all issues covered by the EITI process, such as allegations of corruption in the mining, oil and gas sectors, without fear of reprisal from the state. This is considered a breach of the EITI protocol: Participation of civil society related to freedom of expression.

In terms of operation, civil society appears able to register without excessive administrative burdens. Despite broader civic space reports' references to delays and difficulties in registering some CSOs engaged in governance, anti-corruption and human rights, all CSOs substantially engaged in the EITI process appear duly registered. Statutory procedures requiring government approval for access to foreign funding remain unenforced, as in the previous Validation. There is evidence that CSOs engaged in the EITI are able to access foreign funding, although there appear to be growing challenges in the availability of donor funding for CSOs working on extractive issues.

In terms of association, there continue to be administrative restrictions to civil society organising public meetings and demonstrations, despite constitutional guarantees for freedom of association. Most events organised by civil society since the previous Validation have consisted in press conferences, public workshops and capacity building events, rather than public demonstrations or rallies. The OSCC-ITIECAM platform continued to act as the constituency's key EITI coordination mechanism, although opinions of CSOs consulted were split on whether it was an effective coordination mechanism in practice. The Secretariat considers that civil society is able to associate in relation to all aspects of the EITI process.

In terms of engagement, there do not appear to be any statutory government constraints on civil society's ability to engage in the EITI process since the previous Validation. Civil society representatives regularly and consistently attend MSG meetings and conduct some analysis of EITI Reports. However, active engagement in MSG discussions, outreach and dissemination appears to be driven by organisations that have been nominated by their broader constituency to

represent them in the EITI process, rather than organisations that have been statutory named in the EITI Decree to represent their specific organisations in the EITI process. Only two of the eight MSG seats reserved for the civil society constituency are earmarked for members to be appointed by their broader constituency. The Secretariat understands that several current MSG members from civil society (named by the EITI Decree) currently work for (or have recently retired from) government. The Secretariat considers this a concern given that the vast majority of the constituency's engagement in the EITI process appears driven by the minority of CSOs that have been appointed to the MSG by the broader civil society constituency.

In terms of access to decision-making, there do not appear to be any statutory barriers to civil society using the EITI process to discuss extractive industry issues of relevance for public debate and public policy making. In practice, it appears that CSOs – particularly those nominated in an open, fair and transparent manner to represent the constituency on the MSG – are able to add to the agenda of Cameroon EITI MSG meetings and to use the EITI process to follow up on issues of priority for their constituency. However, several CSOs consulted considered that there were weaknesses in the MSG's capacities to effectively oversee the EITI process given capacity constraints within the Cameroon EITI Secretariat and the lack of attendance at MSG meetings by the MSG Chair. The Secretariat considers that civil society's ability to use the EITI process to access public decision making remains only partial given weaknesses in the accountability of a majority of MSG members representing the constituency and broader weaknesses in the MSG's governance.

The MSG's comments on the draft Validation report argue for an upgrade in the assessment of Requirement 1.3, based on evidence and arguments presented by the civil society constituency. In particular, the comments argue that the constituency's engagement is demonstrated through several documents including civil society's separate comments on the draft Validation report, a letter from CSO MSG members reiterating their commitment to the EITI, a press release by the constituency's OSCC-ITIE platform, minutes of the OSCC-ITIE's 26 January 2024 meeting as well as references to the CRADEC and Transparency International Cameroon websites. The civil society comments acknowledge the Validation report's concerns related to the environment for civil society engagement and weaknesses in the constituency's organisation. However, the comments include objections to the Validation report's arguments that the constituency's broader engagement, including outreach and dissemination efforts, are driven by the minority of organisations nominated to the MSG through open and competitive procedures. The constituency's comments confirm that there have been constraints on its ability to play its full role in EITI implementation, constraints that it considers linked to the broader socio-political and legal context but categorised as factors that civil society has not been able to influence. The comments include a commitment for civil society to pursue its advocacy with government to ease constraints on civic space. With regards to the lack of a spokesperson for the OSCC-ITIE platform, weaknesses in the platform's functioning and the lack of accountability of some CSO MSG members to the broader constituency, the comments also include a commitment to resolve all of these challenges with urgency, as confirmed at the constituency's meetings on 12 and 26 January 2024. The International Secretariat welcomes these commitments to address challenges identified in this Validation with urgency. While the International Secretariat understands that lifting constraints related to civil society's ability to play its full role in the EITI

process and public debate on extractive industry governance are not the sole purview of the civil society constituency and that action by authorities and the MSG will also be required, it considers that the comments received on the draft Validation report confirm the existence of constraints on freedom of expression and of operation in relation to the EITI process that have contributed to weakening civil society's ability to fulfil its EITI responsibilities, further exacerbating divisions within the constituency. While the constituency's commitment to start addressing these challenges is welcome, the Validation's assessment of the period since 2021 has highlighted challenges that should be addressed to optimise the EITI's contribution to improvements in extractive industry governance.