Oxford Insights

Final Independent Evaluation of the Opening Extractives Programme

Full Report
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Credits

This independent evaluation was conducted by Oxford Insights on behalf of the Opening Extractives programme.

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Executive summary

Opening Extractives (OE) is a collaboration between the Extractive Industries Transparency Initiative (EITI) and Open Ownership (OO). Running from 2020 to 2027, it supports efforts to improve the access to and use of data on the beneficial owners of extractive companies across 12 countries.

Beneficial owners are the people who ultimately benefit from the operations and profits of a company, or those who control their activities.[1] Hidden beneficial owners increase corruption risks, and make it difficult for governments to know who is bidding for contracts, financing politicians, and doing business. Beneficial ownership transparency (BOT) is a powerful tool to counter these risks. It is a policy reform governments put in place to require companies to collect and disclose information about their beneficial owners.

The Opening Extractives programme harnesses and unites the strengths of two organisations working in transparency and governance. Open Ownership (OO) is the leading organisation focused on beneficial ownership transparency. OO supports governments to make high quality BO data able to be shared, and teaches others how to use BO data.[2] The Extractive Industries Transparency Initiative (EITI) holds the global standard on extractives industry governance. It is an international initiative to promote the open and accountable management of oil, gas, and mineral resources.[3] When countries join the EITI, they commit to disclosing information about their extractives sector– including beneficial ownership information.

Opening Extractives is a collaboration between Open Ownership and EITI focused on helping countries improve the availability and use of BO data. The program provides

[1] *Open Ownership,* What is beneficial ownership transparency? https://www.openownership.org/en/about/what-is-beneficial-ownership-transparency/

[2] *Open Ownership,* Open Ownership drives the global shift towards transparency and accountability in corporate ownership and control, https://www.openownership.org/en/

[3] *EITI,* Our mission, https://eiti.org/our-mission

technical and political support in implementing BOT reforms to build transparency in the extractives sector.[4]

As the main five year programme draws to an end and the programme transitions into a targeted phase to deepen impact and promote sustainability over the next two years with the exit grant, Oxford Insights has been commissioned to conduct the final evaluation of Opening Extractives. The purpose of this evaluation is to **assess the extent to which the programme has driven meaningful progress in beneficial ownership transparency** (BOT), and to understand what factors contributed to success or have posed challenges across diverse national contexts. Drawing on **outcome harvesting, theory- based analysis, and realist evaluation approaches,** the evaluation seeks to:

- identify, validate and communicate the programme's impact and outcomes;
- reflect on lessons learned through the implementation; and
- provide recommendations to enhance the effectiveness of future initiatives and collaborations.

The evaluation found that the OE programme helped governments and industries in multiple countries strengthen transparency and accountability, while also mobilising global support for BOT. The scale, ambition, and progress that the programme has achieved over the past five years is significant. **More than 80% of survey respondents agreed the programme achieved its objectives**, and **over 70% of respondents said that they felt the OE programme has improved the availability of beneficial ownership (BO) data** in their country or region. This comes despite major challenges such as USAID's suspension of funding, and the impact of war and political unrest, which disrupted operations in several focus countries.

The evaluation found the following main achievements of the Opening Extractives programme:

1. Overall, **stakeholders feel the programme has met its goals,** with more than 80% of survey respondents expressing that OE successfully met its objectives in their country or region.

[4] *EITI,* Opening extractives, https://eiti.org/opening-extractives. *Open Ownership,* Opening Extractives, https://www.openownership.org/en/topics/opening-extractives/

2. The OE programme has **enabled governments and civil society to use BO data to achieve tangible outcomes.**

3. Over the past five years, **almost all of the countries involved in the programme (9) have either proposed or passed laws and regulations in support of BOT,** supported by OE's technical input.

4. Over the course of the programme, **the availability of BO data has significantly increased in some countries.**

5. A key achievement of the OE programme is that **it has succeeded in putting BOT on the agenda in some contexts where it was not well understood beforehand**.

6. OE has helped countries **improve their standing with other multilateral institutions promoting good governance,** and has successfully aligned itself with broader international priorities related to transparency and accountability.

7. The programme has also helped to **forge international relationships between beneficiaries,** which were particularly impactful for evaluation participants.

8. In certain contexts, **stakeholders are confident that progress on BOT will continue with or without the programme.** In other cases, long-term sustainability may be driven on by other existing strong partnerships.

The evaluation also found that the programme faced challenges, both external challenges typical of government reform work, and other challenges more specific to the workings of the program. The main external challenges identified by the evaluation were:

1. **External funding shifts, namely the withdrawal of USAID support to the programme, had a significant impact on the programme.**

2. Participants highlighted how **political changes directly impacted OE's progress, often delaying implementation efforts**.
3. **While some countries faced severe unrest, others dealt with the more typical challenge of government turnover during long-term reforms.**

4. Furthermore, a **lack of political will to support transparency initiatives presented major challenges in some contexts,** often driven by BOT being perceived as a political risk rather than a useful tool.

5. **Restrictive legal frameworks also obstructed implementation of BO reforms** in several countries.

The core challenges the programme faced related to its own operations are as follows:

1. In some contexts, **there is a perception that the programme was not always supported by sufficient resources**.

2. There is some evidence that **stakeholder mapping and engagement could have been more effectively carried out.**

3. Although the collaboration between the two organisations has been beneficial overall, particularly through shared expertise and access to different networks, **collaboration at the country level has sometimes been challenging.**

4. **Differing institutional priorities between EITI and OO also impacted the partnership.**

The evaluation team offers the following recommendations for both OO and EITI, addressing opportunities for strengthened collaboration as well as improvements within their individual operations.

Collaboration

1. OO and EITI should **continue to collaborate on targeted, well-defined activities where there is clear demand and potential for meaningful impact**—for example, the BOT work in extractives licensing screening.

2. Where EITI and Open Ownership continue to collaborate it is essential that there is **consistent coordination between both organisations at the country level**.

3. Similarly, it is important to ensure that **future work conducted by OO and EITI in this area is appropriately resourced**.

Sustainability

4. Where joint programme delivery is winding down, **OE needs to identify the key stakeholders who will be responsible for maintaining BOT on the agenda**, so that momentum is not lost. In some cases it will be for either OO or EITI to take the lead on future work.

5. As the programme tightens its scope in certain countries, **OE should be more proactive about finding efficient ways to communicate updates** to stakeholders in-country.

6. As the programme moves into its two year transition phase, **OE should also double down on ensuring that its knowledge products are visible** to stakeholders.

7. Finally, in some countries, **securing additional funding beyond the scope of what EITI and Open Ownership offer is a prerequisite for making further progress** on beneficial ownership transparency in the extractives sector. Both organisations should acknowledge this, and actively factor it into planning when pursuing further work in the space.

Introduction

What is Opening Extractives?

This report details the findings of Oxford Insights' Independent final evaluation of the Opening Extractives programme. Opening Extractives (OE) is a collaboration between the Extractive Industries Transparency Initiative (EITI) and Open Ownership (OO), funded by the BHP Foundation (2021 - present) and USAID (September 2023 - January 2025). The programme has run from 2020 to 2025 and is supporting work to open up and use data on the beneficial owners of extractives companies across the following 12 countries:

- Ghana
- Liberia
- Zambia
- Armenia
- Senegal

- Philippines
- Mongolia
- Colombia
- Argentina
- Nigeria
- Indonesia
- Ecuador

The programme's ultimate aim is for "citizens of resource-rich countries to realise the maximum benefit from natural resource wealth, in part through the enhanced availability and use of beneficial ownership data".[5]

Due to the substantial revenues they generate, extractive industries are particularly susceptible to corruption, often facilitated through anonymously owned companies. The OE programme is based on the principle that beneficial ownership transparency (BOT) can help to address this issue by gathering and disclosing information about company ownership structures and promoting its effective use. In the long term, this is intended to strengthen governance in the extractive sector, ensuring that more revenue is directed toward essential public services that benefit all citizens.

The key objectives of the OE programme are to:

1. "Enable governments and industry to disclose high quality, open beneficial ownership (BO) data for the extractives sector to improve transparency and accountability in resource-rich countries.
2. Build the capacity of government and local stakeholders to integrate, use, and analyse data in the public domain to improve accountability and governance in resource-rich countries.
3. Mobilise global support for BOT in the extractive industry and beyond, and adapt to post-COVID-19 governance challenges."[6]

The three objectives of the OE programme align with EITI Requirement 2.5, which requires implementing countries to disclose beneficial ownership information for extractives

[5] EITI and Open Ownership. (2020). 'Opening Extractives: Programme Proposal', p.6.
[6] EITI and Open Ownership. (2020). 'Opening Extractives: Programme Proposal', p.6.

companies. In order to meet its objectives, the programme looks to contribute to three main outcomes:

1. "Ensure government, industry and civil society actors have greater access to comprehensive and reliable information on the ultimate owners of extractive industry companies.
2. Enable government, industry and civil society actors to more easily identify and address corruption and mismanagement risks related to hidden ownership.
3. Advance BOT in the extractive industries and beyond in a post-COVID-19 context by documenting and communicating the impact and outcomes of the programme."[7]

The OE programme operates in a distinctive way, dividing responsibilities between two organisations: The EITI, a large multi-stakeholder body with 54 member countries, and Open Ownership, a smaller organisation specialising in technical reforms related to beneficial ownership transparency. Generally, the EITI focuses on securing government support and fostering political commitment to BOT reforms in participating countries, while Open Ownership provides technical assistance to support the implementation of these reforms. This structure is intended to allow the OE programme to leverage the complementary strengths of both organisations, creating unique opportunities for impact.

Evaluation objectives

This evaluation seeks to answer an overarching question:

To what extent has OE driven meaningful progress in beneficial ownership transparency, and what factors have shaped its success or limitations across different contexts?

To ensure a thorough and structured assessment, the evaluation is guided by the OECD Development Assistance Committee (DAC) criteria. These criteria provide a framework for evaluating programme performance across five key dimensions. The report begins with an overarching summary of the programme's main contributions and challenges, followed by a series of chapters dedicated to each criterion:

[7] EITI and Open Ownership. (2020). 'Opening Extractives: Programme Proposal', p.7.

- **Effectiveness and impact:** *To what extent did the Opening Extractives programme achieve and deliver on its stated objectives?*
- **Relevance:** *Has the Opening Extractives programme, in the country context, delivered on the stated objectives of the work plans?*
- **Coherence:** *How well did the Opening Extractives programme fit into other or similar interventions in the country, which share similar objectives?*
- **Efficiency:** *Did the Opening Extractives programme deliver on the objectives in an economic and timely way?*
- **Sustainability:** *Did the Opening Extractives programme ensure that its interventions could continue after the programme?*[8]

An Annex also details more specific findings, including country level stakeholder maps and a programme level gap analysis which illustrates where the programme's initial logic model has been realised, and where there are gaps between theory and practice. Interview and survey questions are also included in the Annex.

Evaluation scope

The evaluation covers the duration of the Opening Extractives programme, from its inception in 2021 through to June 2025, when interviews and analysis concluded. The evaluation focuses specifically on activities funded under the Opening Extractives programme and does not seek to assess the broader, independent work of Open Ownership or the EITI.

We reviewed programme activities carried out in all Opening Extractives countries, with a focus on Ghana, Armenia and Argentina as case study countries, along with regional and global advocacy efforts supported by the programme. See the Methodology section below for our rationale for case study selection.

[8] A full list of research questions is included in the Annex.

Methodology

Methodological approach

OE operates across diverse country contexts, each with distinct legal, institutional, and political conditions. These variations, combined with differences in extractive industry structures and the programme's multi-stakeholder governance model, create a complex environment for implementation and evaluation.

To address this, the evaluation adopts a **theory-based, realist approach** which goes beyond outcome measurement in isolation to explore what works, for whom, and under what conditions. By grounding the evaluation in this complexity, our aim was to generate context-sensitive insights that reflect the real-world environments in which OE operates. This overarching approach is underpinned by three complementary methodical techniques: Outcome Harvesting, Theory-based Analysis, and Realist Analysis.

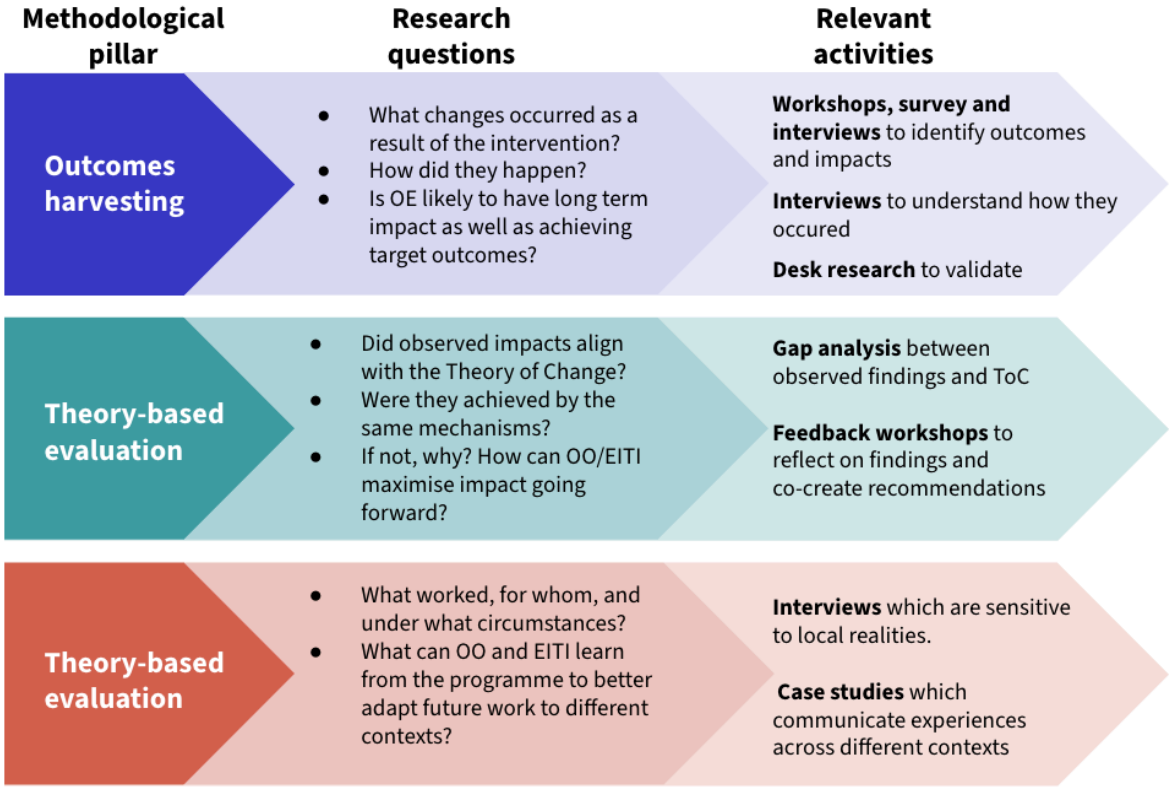
1. **Outcome harvesting**
   Through workshops, interviews, and desk research, we systematically documented any evidence of the tangible outcomes of OE's work. Outcomes included changes in data availability, data quality, stakeholder capacity (both within and outside of government) and in data use. The results of the outcome harvesting exercise are documented within the 'Impact and Effectiveness' chapter of this report.

2. **Theory-based analysis**
   Where outcomes were identified, we traced their origins to understand how they emerged and the degree to which they could be attributed to the programme. We then compared the observed outcomes with those anticipated in the programme's Theory of Change (included in the Annex) to assess how well the original programme theory held up in practice. These reflections are discussed in detail in the overarching findings section of the report.

3. **Realist analysis**
   Recognising that beneficial ownership reform rarely follows a uniform path, we closely examined the specific political and institutional contexts in which OE has operated. To

deepen our understanding of what works, where, and why, we selected case studies that reflect both successes and challenges in more complex environments. These case studies – focusing on programme implementation in Argentina, Armenia, and Ghana – are interspersed throughout the report. For more on our selection criteria, see the 'Case study selection' section.

The overarching methodological approach and its link to the data collection methods are summarised below.



Data collection methods

In practice, the evaluation drew upon four main data collection methods:

1. **Interviews:**
   We carried out interviews with government officials, civil society actors, private sector representatives, and implementing consultants in three case study countries – Argentina, Armenia, and Ghana. These interviews provided nuanced, in-depth insights

into the programme's work in these contexts. We also interviewed country and regional leads from EITI and OO at the start of the evaluation to develop an understanding of the programme's core activities, intended outcomes, and potential challenges.

Stakeholder group	Number of interviews
Opening Extractives staff	15
Government officials	7
Civil society organisation	2
Private sector	1
Opening Extractives Consultant	2
Total	27

2. **Global workshops:**
   To ensure broader stakeholder representation beyond the case study countries, we offered all 12 implementation countries the opportunity to participate in online global workshops. These sessions were designed as an inclusive platform for stakeholders – including those not selected for interviews – to share their perspectives on the programme's key successes, challenges, and the future of stakeholder engagement on BOT in the extractives sector. The sessions took place on the 3rd and 4th of June and were facilitated using Miro.

   In addition to data collection workshops, we are also planning to hold feedback workshops, to ensure the findings outlined in this report align with the experiences of those closest to OE implementation.

3. **Global survey:**
   A global survey was circulated to stakeholders across all 12 implementation countries, providing an additional opportunity for input from a broad range of actors. Like the workshops, the survey was designed to offer stakeholders, particularly those who were not interviewed or unable to attend live sessions, a chance to contribute their

perspectives on various aspects of OE's work. Participation was voluntary, and the survey served as a practical tool to help ensure that a diverse set of voices could be reflected in the findings. The survey received 19 responses. Survey results are referenced throughout this report and included in the Annex.

4. **Desk research:**
   We undertook a systematic review of programme documentation provided by the OE leadership team, including annual reports and logframes. In addition, we sought independent sources to corroborate claims made during interviews and workshops, for example, reviewing publicly available BOT data in participating countries to assess the coverage and quality of information.

Case study selection

As outlined above, a case study approach was adopted to enable a more detailed and nuanced understanding of how the programme operates in different contexts. In collaboration with the Opening Extractives leadership team, and following consultation with country and regional leads, Argentina, Armenia, and Ghana were selected based on the following criteria:

- **Geographic spread**: The selected countries represent different regions in which the programme operates, helping to reflect a diversity of political, social, and institutional environments that may influence implementation.
- **Examples of success**: Both Ghana and Armenia represent contexts where the programme has demonstrated strong progress. This allows for an exploration of key achievements and the factors underpinning key programme outcomes.
- **Examples of challenges**: Argentina illustrates a context where progress has been more constrained, largely due to external factors. This ensures the evaluation captures key challenges, how the programme responded, and how effective those responses have been.

Together, these case studies offer a balanced view of the programme's performance across varying conditions and stages of implementation.

Limitations

Certain limitations inherent to the evaluation process remained, despite efforts to address them. These included:

- **Incomplete visibility of outcomes:** While we aimed to capture OE's outcomes and impacts as comprehensively as possible, it is likely that not all changes or results were identified. This was partly because the stakeholder interviews focussed on three core case study countries, along with core OE staff, and our reliance on participants to report outcomes via surveys and workshops. To reduce the risk of missing outcomes, we supplemented our qualitative methods with desk research, though some gaps may remain.

- **Challenges with attribution:** In complex, multi-actor environments, it can be difficult to isolate OE's specific contribution to a given outcome. Many results were the product of complementary efforts by different stakeholders. Some of these relevant stakeholders were not necessarily OE programme stakeholders, but government officials with other affiliations which were not necessarily included in the OE programme design. During interviews, we explicitly asked stakeholders whether the observed changes would have occurred without OE's involvement, but establishing full attribution remained a challenge.

- **Stakeholder representation gaps:** Although the evaluation was designed to be inclusive, some groups were underrepresented. Based on our midterm experience, private sector actors in particular remained less engaged with the programme and were harder to reach in the evaluation as well.

- **Limitations of virtual engagement:** We conducted the evaluation remotely, with a flexible approach to scheduling interviews at stakeholders' convenience and providing alternative channels (such as phone or email) for those unable to join video calls.

However, conducting the evaluation remotely may have limited some stakeholders' participation, particularly for those with limited internet access.

- **Reliance on self-reported data:** Much of the evaluation evidence came from stakeholder narratives and interviews, which were inherently subjective and potentially affected by recall bias or selective reporting. We triangulated self-reported data with desk research to validate key claims. However, in some cases (such as when participants reported shifts in political will or behaviour) this kind of verification was not possible, and the risk of bias remained.

- **The evaluation period:** As the final evaluation was conducted during the final six months of the core programme period, OE's earlier progress and contributions were less front and centre in the evaluation findings, compared to the progress and impacts of the last two years of the programme. Furthermore, the results and impact of the programme will likely continue beyond the period of the evaluation, as BOT reforms take time to be implemented, and for the results to materialise.

Overarching findings

Research question: To what extent has OE driven meaningful progress in beneficial ownership transparency, and what factors have shaped its success or limitations across different contexts?

This section provides an overview of the programme's key successes and the factors that contributed to them. It also explores the internal and external challenges the programme encountered, along with the strategies Opening Extractives employed to address these obstacles.

Main achievements of the Opening Extractives programme

The evaluation found that the programme is delivering value across several areas, as detailed in the subsequent chapters of this report. Here, we provide a summary of the programme's main contributions:

1. **Overall, stakeholders feel the programme has met its goals, with more than 80% of survey respondents expressing that OE successfully met its objectives in their country or region.**

Several stakeholders also noted that the benefits of the programme may not yet be fully realised, and that OE's impact would continue to emerge over time, extending beyond the formal programme period:

> **"The programme made positive progress towards realising these goals, despite its limited duration. Given the level of systemic change required for some of the programme's goals to be realised, this will happen well beyond the programme's period of implementation, especially if efforts made are sustained."**
>
> **Survey respondent, CSO partner in Zambia**

2. **The OE programme has enabled governments and civil society to use BO data to achieve tangible outcomes.**

Training for government staff, civil society representatives, and journalists was frequently highlighted as one of the programme's key contributions. While survey participants noted that "one-off" events have limited impact, the programme's shift toward a more cohesive and sustained training approach in recent years has been widely seen as a positive development. This is particularly evident in the recent efforts to integrate BO data into mining licensing processes. The box below explores a case study from Armenia in more detail.

Case study: Using data from Armenia's BO register to investigate mining license applications

In 2021, Armenia launched a public beneficial ownership register covering extractive companies, and in 2023 the country expanded it to cover the entire economy.[9] Following on from this, the OE programme has been helping to provide technical assistance to scale up data use in the country. One area that the OE programme has focused on has been in helping government stakeholders use BO data as part of their due diligence investigations.

In Armenia, the OE programme organised trainings and discussions with government stakeholders on how to obtain and use information from the country's state BO registry in "more diverse ways".[10] Government stakeholders then, for the first time, brought what they had learned in the OE training sessions to an investigation into a company's application for a mining license.

To start mining in Armenia, a company must first obtain a license for geological exploration and then submit a geological report detailing mineral reserves and the feasibility of the mine.[11] One mining company (Company 1) submitted its report,

[9]Nyasha Vera (2025), 'Armenia: a model for economy-wide beneficial ownership transparency', *EITI,* https://eiti.org/impact-story/armenia-model-economy-wide-beneficial-ownership-transparency

[10]Interview Armenia 2.

[11]Interview Armenia 2.

including reference indicators from a different mine operating in similar conditions (Company 2) – a method which is normally considered acceptable.[12]

Drawing on lessons from OE training sessions, Ministry of Territorial Administration and Infrastructure stakeholders investigated Company 2 using Armenia's State BO Register. They used the register to assess the legality of the submitted reference and reviewed previous submissions by the beneficial owner. In doing so, they found that Company 2 was not a licensed user with the Suboil Department at the time. Consequently, the reference data provided by Company 1 was deemed unreliable.[13]

Company 1 was given the chance to correct this, along with a few other errors that were identified in their geological report. However, the company did not make the required corrections within the specified time limits, and did not re-submit their report. Consequently, the authorities rejected Company 1's application. Upcoming legislation in the country could mean that this prevents the company from receiving a license for another ten years.[14]

As an interviewee shared,

"The training and discussions organised by OE played a very important role in our discovery, during which it became clear how to obtain information about the BO data from the state registry website. And, of course, during the investigation we used the information about the BO data posted on the State Registry website for the first time , as a result of which we were able to reveal the above-mentioned inaccuracy and prevent the company from obtaining an extractive license in the future.[15]

Government interviewee from Armenia

It is important to note that integrating BO data into the licensing process has not yet been legally adopted in Armenia. Introducing this at the legislative level would be an important next step for the country, contributing to improving the efficiency of the

[12] Ibid.
[13] Ibid.
[14] Interview Armenia 2.
[15] Interview Armenia 2.

licensing process and the adoption of international best practices.

In Ghana, OE provided training for journalists and civil society organisations about using BO data in investigations. BO data was shown to be a powerful tool, capable of influencing regulatory decisions and leading to extractive companies being denied operating licences.[16] The box below explores a case study from Ghana in more detail.

Case study: Uncovering criminal activity using BO data in Ghana

In Ghana, the civil society organisation Northern Patriots in Research and Advocacy (NOPRA) conducted an investigation into the company Cassius Mining Ltd, which was incorporated in 2016 for the purpose of conducting gold mining in the Gbane community in the Talensi District of the Upper East region of Ghana. The organisation was able to discover that multiple of the beneficial owners of the company had criminal records in Australia, including crimes related to possession of narcotics, fraud, market manipulation, and unprofessional conduct and breach of duty. Under Ghanaian law, people with criminal records are forbidden from doing business in the country. As a result of this investigation, in 2020 Ghana's Minister for Mines instructed the Minerals Commission not to renew the mining license for Cassius Mining Ltd.[17]

Bismark Adongo, the Executive Director of NOPRA, applied to participate in OE programme capacity building workshops for journalists and civil society organisations on using BO data.[18] Adongo participated in workshops led by OE, covering BO disclosure, accessing and using BO information, and other related topics. Following the workshops, Adongo applied to participate in a pilot project on using BO data. As part of the project, Adongo received a grant from the OE programme to investigate the beneficial owners of mining companies, and OE provided coaching and other resources to support the research. In December 2022, Adongo published the story "Is Ghana effectively using beneficial ownership data for due

[16] Interview Ghana 2.

[17] Julie Rialet and Alanna Markle, EITI and Open Ownership (2024), 'Lessons for an accountable transition: Leveraging beneficial ownership information for natural resource governance', p 18.

[18] Ibid.

diligence in its extractive sector?" on Ghana Web, which documented the findings of the investigation into Cassius Mining Ltd carried out by NOPRA. [19] In Adongo's words,

> ***"I remember getting the opportunity to share my work with the Minerals Commission, Ghana Police, and with the Interior Minister of Ghana and with the Ministry of Justice [...] The company that I used as a case study [...] couldn't do business anymore in Ghana and got kicked out."***[20]
>
> **Bismark Adongo, Executive Director of NOPRA**

3. **Over the past five years, almost all of the countries involved in the programme (9) have either proposed or passed laws and regulations in support of BOT, supported by OE's technical input.**

We heard repeatedly that a key contribution of the Opening Extractives programme has been its ability to provide technical assistance to government stakeholders pursuing legal reforms pertaining to BOT in the extractives sector.[21] OE has provided valuable support to facilitate the release of new regulation in Liberia, Ghana, Argentina, and Armenia. The Philippines has concluded with their Fiscal Regime Act, which is now in place.[22] Argentina introduced reforms but external challenges have slowed progress. Mongolia, Zambia, and Senegal, have also made progress in this area, with Senegal passing a decree in July 2025 to develop a public BO register. [23]

While legal reforms alone do not guarantee strong implementation in all contexts, they are a

[19]Interview Ghana 2, OE 11, OE Progress Report 2022-2023, p9.
[20]Interview Ghana 2.
[21] Note funding from one of OE's donors, the BHP Foundation cannot be used to support lobbying activities. The Opening Extractives programme does not explicitly lobby for legal change, rather provides technical input for government officials already pursuing legal reform.
[22]Erika Mae P. Sinaking, "New fiscal regime for mining industry signed into law," *Business World*, 5 September 2025. https://www.bworldonline.com/top-stories/2025/09/05/696011/new-fiscal-regime-for-mining-industry-signed-into-law/
[23]
https://mesrisenegal.sn/2025/07/16/communique-du-conseil-des-ministres-de-ce-mercredi-16-juillet-2025/

critical foundation for advancing beneficial ownership transparency and a key mechanism for keeping it on the policy agenda, and in certain jurisdictions enabling the use of BO data in licensing processes. More detail on OE's contributions here, and what they mean in practice, is included in the Effectiveness and Impact section.

4. **Over the course of the programme, the availability of BO data has significantly increased in some countries.**

The extent of change in beneficial ownership data availability over the course of the programme varies widely across countries. Notable progress has been made in Armenia, Liberia, and Ghana. Armenia now maintains a comprehensive BO register covering all sectors of the economy, Liberia launched a new register with support from the programme (although it is yet to be digitised), and data sharing between government agencies in Ghana has increased significantly.

These improvements in data availability have taken place against a backdrop of significant challenges. In the Latin American region, for example, there are particular barriers to publishing BO information openly. As one interviewee explained, companies and government officials often oppose public access on security grounds. Some company owners fear that criminals could exploit BO data to identify wealthy individuals, potentially leading to kidnapping or violence. However, despite these concerns, there is no tangible evidence of such risks materialising in practice.[24]

In addition to cultural and political challenges, many countries also face technical and institutional obstacles to effective data sharing. For example, when a tax authority is designated as the lead agency for a BO register, access is sometimes restricted to a limited number of government bodies. Similar issues with inter-agency cooperation have been observed in multiple contexts, limiting the wider use of BO data for transparency and accountability.

Despite these challenges, OE's work in Argentina illustrates how progress is still possible. The box below explores this case study in more detail:

[24] Interview OE 14.

Case study: Improving public BO disclosures in Argentina

Argentina faces a number of barriers to the public disclosure of BO information. In 2024, the country passed a new anti-money laundering (AML) law, creating a central BO register under the country's tax agency, which has high levels of compliance.[25] However, because it sits within the tax agency, data is protected and cannot be shared or published, as is mandated by the EITI Standard. As a result, EITI relies on voluntary disclosures by companies, which are reflected in EITI reports.

Most mining companies operating in Argentina are Public Limited Companies (PLCs). When asked to disclose their BO information, they typically point to filings on the stock exchange, which provides limited insight into Ultimate Beneficial Owners. At the same time, energy companies in Argentina do not currently comply with EITI disclosure standards. Together, these factors make it challenging to obtain comprehensive public information on the beneficial owners of extractive companies in the country.

Another challenge is that hydrocarbon contracts and mining licenses in Argentina are issued by the provincial governments, rather than the federal government. Companies that want to participate in extractive projects need to be formally registered in the province where they operate. This leads to duplication and fragmentation of data, as each province needs to collect BO data from companies, and share the data with the relevant mining or energy department for screening. The level of BO information collected is highly dependent on the regulations in each province, which vary. Some provinces have made noticeable efforts to begin collecting and using BO data, in particular the province of Buenos Aires, which has developed their own BO registry.[26] Like the BO registry at the federal level, however, the registry in Buenos Aires is also not accessible to the public.

Despite these significant contextual challenges, the OE programme adopted a collaboration-focused approach to improving BO disclosures in Argentina. It supported multiple consultations and a participatory process that were well attended by government,

[25] https://www.boletinoficial.gob.ar/detalleAviso/primera/304764/20240315

[26] https://www.gba.gob.ar/dppj/sociedades_comerciales

civil society and industry representatives.[27] The three-part participatory process focused on defining BO for the Argentinian extractive sector and resulted in the drafting of two modifications to administrative regulations for the mining and hydrocarbon sectors, aimed at enabling voluntary disclosure of BO information by companies. The proposed modifications received support from the EITI's Multi-Stakeholder Group (MSG) and two vice-ministries, however, a change in government prevented the modifications from being implemented. Nonetheless, stakeholders described the participatory process as an important step in coming to consensus around a definition and raising the profile of BOT, amongst companies and government stakeholders in particular.[28]

Interviewees also told us that the participatory processes spearheaded by OE have led to more extractives companies voluntarily disclosing their beneficial owners in the bi-annual EITI report.[29] Annex II of the Argentina 2022- 2023 EITI Report publishes detailed information on BO according to the EITI Standard, a clear sign of progress from Argentina's previous EITI Report. The report includes many publicly listed companies and the links to the stock exchanges where these companies are listed. It also adds information on the beneficial owners of seven companies, some with operations at the provincial level. Six of those companies have also provided information on persons of significant control.

5. **A key achievement of the OE programme is that it has succeeded in putting BOT on the agenda in some contexts where it was not well understood beforehand**.

Reflecting on the feedback received during the midterm evaluation, it was repeatedly noted that OE has played a significant role in increasing awareness and understanding of beneficial ownership transparency – both within the extractives sector and more broadly. This contribution should not be underestimated. Many stakeholders emphasised that beneficial ownership is a highly technical and complex topic, often challenging to engage

[27] https://www.argentina.gob.ar/economia/mineria/eiti-portal-de-transparencia-de-las-industrias-extractivas/proceso-participativo

[28] Interview Argentina 2.

[29] OE Progress Report 2022-2023, p8.

the extractives sector around. Opening Extractives has effectively bridged that gap, helping to bring attention and momentum to this critical issue.

For example, on July 16, 2025, Senegal's cabinet reviewed and approved a decree to establish a public BO registry for the extractive sector.[30] The passage of the decree is the culmination of a long period of sustained engagement by the OE programme in Senegal. The programme supported Senegal with research into which amendments were required, provided capacity building, and provided high-level political engagement, which led to the drafting of the decree.

Elsewhere, a survey respondent from Ghana shared that they felt the OE programme has "ensured increased commitment by government officials to disclose beneficial ownership," and another respondent shared that OE secured greater buy-in from high-level government officials in Armenia, who are now participating more often in meetings on these topics.[3132] Stakeholders in Zambia also expressed optimism about the level of political commitment to BOT in their country.

6. **OE has helped countries improve their standing with other multilateral institutions promoting good governance, and has successfully aligned itself with broader international priorities related to transparency and accountability.**

A notable example of impact can be seen in Liberia. Thanks to the efforts of Opening Extractives, the country has begun manually collecting BOT data for the first time. Following the programme's support in drafting regulations, data collection forms and building awareness, the Liberian government is actively working towards establishing a digital register and publishing guidance notes to drive up compliance.[33] This progress was acknowledged in a recent International Monetary Fund (IMF) diagnostic, contributing to an improved assessment of Liberia's performance.[34] This assessment was conducted in relation to a beneficial ownership conditionality in the IMF loan to Liberia, so advancing BOT is a key priority for the

[30] https://www.presidence.sn/en/actualites/cabinet-meeting-of-wednesday-july-16-2025
[31] Survey respondent.
[32] Survey respondent.
[33] Interview OE1.
[34] https://www.elibrary.imf.org/downloadpdf/view/journals/002/2025/044/article-A002-en.pdf

government in its repayment obligations to the IMF. The OE programme's support has been instrumental in helping Liberia meet these obligations. During the course of the programme, the World Bank Stolen Asset Recovery Initiative also supported the work in Liberia due to the momentum built under OE. The African Development Bank (AfDB) institutional support to government agencies, including the corporate registry, the LBR, is being shaped by recommendations from the programme and enabling the sustainability of reforms.[35]

Beyond national-level progress, the programme has also succeeded in elevating the profile of BOT in extractives among influential international actors, including the German Agency for International Cooperation (GiZ), the World Bank, the United Nations, the Inter-American Development Bank and the Financial Action Task Force (FATF). In countries like Liberia and Argentina, these partnerships are expected to be instrumental in maintaining momentum and ensuring long-term impact beyond the life of the programme.[36]

7. **The programme has also helped to forge international relationships between beneficiaries, which were particularly impactful for evaluation participants.**

Peer exchange events were frequently cited, especially by government representatives, as a valuable component of the programme. In several instances, these exchanges translated into concrete outcomes. For example, following a peer learning event in Africa, Nigeria's Registrar General drew inspiration from Ghana's approach to state-owned enterprises and played a key role in incorporating similar provisions into Nigerian legislation.[37]

8. **In certain contexts, stakeholders are confident that progress on BOT will continue with or without the programme. In other cases, long-term sustainability may be driven on by other existing strong partnerships.**

The likelihood that the progress achieved under the programme will continue varies across countries. In contexts like Armenia, where OE has contributed to – but is not the sole driver of – a thriving BOT ecosystem, stakeholders were confident that progress would persist without the continued support of OE, largely due to established legislative precedents. More detail on this can be found in the Sustainability chapter.

[35] Interview OE1.
[36] Interview OE1, OE14.
[37] Interview OE1.

In other settings, however, stakeholders expressed greater uncertainty about the future of BOT in the extractives sector. Nonetheless, OE has played a crucial role in raising the profile of BOT among key organisations and facilitating partnerships that enhance stakeholders' ability to sustain progress. This is evident in Argentina, where the FATF is driving further reforms, and in Liberia, where BOT remains a focus for the IMF.[38]

Overarching challenges

While the programme has achieved significant progress and results, it has also faced challenges. These are grouped here into two categories: external challenges – those arising from broader contextual factors – and internal challenges linked directly to the programme.

External challenges

1. **External funding shifts, namely the withdrawal of USAID support to the programme, had a significant impact on the programme.**

The pause and subsequent withdrawal of USAID support, in early 2025 has had a significant impact on the programme, leading to the suspension of some planned activities.[39] This was consistently highlighted as a major concern for current and future programme delivery, especially in the Latin America and Caribbean region, where USAID had played a dominant role in the programme's funding profile, as well as for many other organisations working in the transparency and governance space in the region.[40]

The loss of this support raised broader questions about the financial sustainability of the programme in certain contexts, and the wider ecosystem that supports BOT at national level.[41] There are further unknowns about how the ecosystem will develop in key contexts during the next few years due to the important role played by USAID.[42] The funding cuts, therefore, have led not just to a direct impact on the OE programme's planned activities, but

[38]Interview OE14, Interview OE1
[39]Information provided in an OE comment.
[40]Information provided in an OE comment.
[41]Interview OE6
[42]Interview OE 6

also on the ability of local stakeholders, including civil society organisations and government, to continue working on BOT in extractives reform:

> ***"The US was the main Official Development Assistance country in the region. Many organisations working on transparency, open government, environment, human rights, have disappeared or are about to disappear. I don't know if this specific topic in some countries will keep being important."***
>
> **Interview OE6.**

2. **Participants highlighted how political changes directly impacted OE's progress, often delaying implementation efforts**.

Throughout the course of the programme, approximately half of the countries involved in Opening Extractives experienced political transitions that impacted programme operations. While changes in government are to be expected, some of these transitions were particularly significant: for example, Ukraine's state of martial law resulting in a complete halt to operations due to the outbreak of war. As one interviewee noted:

> ***"It is difficult to overstate the impact political changes had on the programme. At the start, Ukraine was one of the participating countries."***
>
> **Interview with Opening Extractives senior leadership**

In the Latin America and Caribbean (LAC) region, political instability was frequently mentioned as a significant challenge, although the specific reasons varied between countries. In Ecuador, political instability impacted the programme's operations, and an interviewee explained that this was largely due to ongoing political unrest since 2022. This created an unpredictable environment that made it difficult for the programme to build and maintain stable, long-term relationships with key stakeholders.[43]

3. **While some countries faced severe unrest, others dealt with the more typical challenge of government turnover during long-term reforms.**

[43] Interview OE14.

In Argentina, for example, the programme has been affected by the change in power following the 2023 election. Since the change in government, the political climate has been described as unfavourable to the programme's goals. One interviewee remarked, "They are giving lots of priority to individuals, opposing state involvement and regulation of property. Many agencies are being cut. It's not an easy context."[44] Prior to the elections, there were agreements for the provision of BO information and the establishment of a public voluntary registry. According to one interviewee, "these resolutions were agreed and were going to be implemented in 2024, but then the government changed and this all got suspended."[45]

Even in more developed contexts like Indonesia, where a BOT registry is in place, the programme has also experienced the impact of government changes and the staff changes that come with them. As one interviewee explained:

> ***"We have been engaged with the ministry called ESDM, the Ministry of Energy and Mineral Resources. Over the past 3 years, we have supported them on BO data use, conducting capacity building and trying to encourage them to use BO data as part of licensing process, also supported in peer exchanges with other countries. However, because of elections last year, the priority of the country has shifted so they have deprioritised BO. There have also been several shifts in leadership so some of the people who we have been working with and training for the past few years are no longer holding the positions that they used to, so that was one of the challenges."***
>
> **Interview OE4.**

4. **Furthermore, a lack of political will to support transparency initiatives presented major challenges in some contexts, often driven by BOT being perceived as a political risk rather than a useful tool.**

We found evidence of this in Argentina, Zambia, Liberia, the Philippines and Ecuador.

Some participants from Zambia and Liberia spoke about BOT registries being seen as a risk to officials rather than a productive tool for ensuring that natural resources are effectively

[44] Interview Argentina 2.
[45] Interview Argentina 1.

governed. It should be noted that this perception of risk was not held across all government agencies or political leadership.[46]

In the same vein, efforts to engage the Department of Environment and Natural Resources in the Philippines were unsuccessful despite a strong and committed EITI National Secretariat. Political dynamics and the fact that some government officials held vested interests in extractive companies created significant obstacles. As one interviewee noted "despite sustained efforts on our part, we were ultimately unable to move the work forward."[47]

Elsewhere, evaluation participants believed that political will was lacking because BOT is not a government priority, and in some cases, directly conflicts with the current administration's governing principles. For example, in Argentina:

> ***"I don't think the BOT agenda is going to be a need or priority for any government agency in Argentina… The current context hasn't been good for any agenda that isn't purely economic."***
>
> **Interview Argentina 2**

Similarly in Ecuador:

> ***"But then reforms happened which went against the grain of what we were doing. [Things] started to fall backwards."***
>
> **Interview OE 14**

Across the broader LAC region, this lack of political will is connected to longstanding cultural and historical resistance to financial transparency, as well as concerns about data protection and privacy rooted in insecurity. For instance, there are fears that such information might be used to locate and harm company leaders, even though no evidence supports that this has happened. To quote an OE regional lead, "The topic in LAC has faced a huge wall previously, there has been strong backlash against publicising information relating to a person's patrimony."[48]

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[46] Participant in Workshop 1, held on 3rd June 2025.
[47] Interview OE4.
[48] Interview OE14.

5. **Restrictive legal frameworks also obstructed implementation of BO reforms in several countries.**

As mentioned earlier, robust legal foundations are important in advancing BO disclosure and data use, and legal frameworks in some countries have held back progress in this area. More specifically:

- In **Colombia**, the OE programme collaborated with the Tax Authority (DIAN) to facilitate BO data sharing. However, legal restrictions prevent DIAN from sharing data with unregistered agencies, slowing progress.[49]
- In **Ecuador**, legal constraints impeded full BO disclosure and implementation. Unclear definitions of a beneficial owner and inconsistencies in disclosure requirements slowed down progress (amongst other challenges) .[50]
- In **Indonesia**, the lack of an adequate legal framework has significantly slowed the integration of BO data into licensing processes.[51] Although several capacity building sessions have been held, stakeholders noted that the data can not be used in licensing processes until enabling legislation is passed. As one interviewee explained "we are not using this data as part of the licensing process until there is legislation to that effect, legislative reforms have been taking time". Due to these persistent challenges, the decision was made last year to lessen OE support in Indonesia.[52]

Internal challenges

1. **In some contexts, there is a perception that the programme was not always supported by sufficient resources**.

This came across particularly strongly in the evaluation survey. Two respondents from Senegal wrote detailed responses highlighting that they felt the programme there drew upon "junior or inexperienced" consultants and that activities had low budgets:

[49] Regional Progress Notes, p.12.
[50] Regional Progress Notes, p.13.
[51] Interview OE4.
[52] Interview OE4.

> ***"This limited the ability of the countries in the programme to access experienced and high-quality consultants who could have enhanced the ability of the countries to make substantial progress towards BOT."***
>
> **Survey respondent, Senegal**

We also heard that Opening Extractives had struggled to recruit high-quality local consultants in Indonesia, resulting in delays.[53]

Programme staff also indicated that some individuals, particularly those with responsibilities across multiple countries and the central programme manager, have been overstretched.[54] This highlights potential capacity constraints within the delivery team and suggests that, even after the 2023 decision to reduce the programme's scope and activities, workload pressures remained.

The programme's progress appears to be partly driven by highly committed individuals who go above and beyond due to their passion for the work. However, without adequate resourcing, there remains a risk of burnout and long-term unsustainability.

2. **There is some evidence that stakeholder mapping and engagement could have been more effectively carried out.**

In Ecuador, for example, stakeholders described that OE struggled to maintain support for their work from the local MSG, and government stakeholders including the Superintendence of Companies and the Internal Revenue Service. More detailed information on this can be found in the Relevance chapter. While this gap in stakeholder engagement was noted, it should be also seen in the context of much deeper contextual obstacles, including the significant impact of civil unrest, as detailed under External challenges.

Feedback from the survey suggests that gaps in stakeholder engagement were not isolated to Ecuador. One respondent from Senegal described the programme's approach to capacity building and technical assistance as "fragmented", noting limited reach and engagement with key stakeholder groups—both in terms of participation levels in events and thematic breadth. This suggests that, in some instances, a more wide-reaching engagement strategy may have

[53] Insight from workshop with OE staff, August 2025.
[54] Interview OE 11.

been beneficial.

3. **Although the collaboration between the two organisations has been beneficial overall, particularly through shared expertise and access to different networks, collaboration at the country level has sometimes been challenging.**

OE team members from across both EITI and OO very clearly value the collaboration and the subject matter expertise offered by colleagues in both BOT and working within the extractives sector.

> ***"It's been a wonderful collaboration, we were incredibly lucky to find another organisation so committed to this subject."***
>
> **Interview OE14.**

However, as multiple interviewees from within the OE programme explained, coordinating work between two organisations can be logistically difficult, due to busy schedules, differing time zones and the fact that many team members travel regularly:

> ***"There's often a much longer gap between making a decision and seeing it implemented. It's nobody's fault—it's simply a byproduct of working across two organisations and two sets of calendars, and having to ensure the right people are available at the right time".***
>
> **Interview OE2**

Meanwhile, in some countries, though not universally, there appears to have been a lack of effective coordination between OO and EITI staff operating at the country level. This issue seems to have primarily occurred in OE's work to develop the extractives licensing manual, and other work in BO data in extractives licensing, as this was an area where the two organisations collaborated very closely. It was also exacerbated by staffing changes over the past two years. One respondent reflected on the operational complexity of translating high-level outcomes into actionable activities at the national level, noting:

> ***"At an operational level it was complex to understand the outcomes and how to translate outcomes into implementation in the country. Are we supposed to be working together or separately? Sometimes we have meetings, but there have also***

been internal changes in the responsibilities for the BO programme."

Interview OE8

4. **Differing institutional priorities between EITI and OO also impacted the partnership.**

A key challenge identified within the programme relates to differing priorities and capacity between OO and EITI, which at times has impacted delivery of the programme . While EITI's focus is on supporting countries to align with its broader standard, including but not limited to BO, OO is specifically concentrated on BO, though not exclusively within the extractives sector. This difference in scope and emphasis has occasionally led to misalignment.

Several interviewees from EITI highlighted that BO constitutes "just one small part of the many things we work on." [55] Although BO is formally embedded within EITI's standards and cannot be deprioritised, its technical complexity and relative niche status risk it being overshadowed by other workstreams. Another interviewee expressed concern that BO can be lost within EITI's broader portfolio, due in part to its technical nature which can be difficult to grasp.[56]

From OO's perspective, staff reported feeling under-equipped to deliver some specific technical outputs that are extractives specific without consistent subject-matter support from EITI, who are managing this broader portfolio. Though OO staff were well equipped for the delivery of work related to legal guidance and BO registry support, this issue arose in relation to the Extractives Licensing Manual, part of phase 2 of the programme. As one interviewee described, understanding the complexities of natural resource governance and licensing when creating the manual "was transversally challenging for OO."[57]

[55] Interview OE9.
[56] Interview OE8.
[57] Interview OE11.

Recommendations for EITI and Open Ownership beyond OE

Reflecting on the findings presented in the subsequent chapters of this report, we offer the following recommendations for both OO and EITI, addressing opportunities for strengthened collaboration as well as improvements within their individual operations. The recommendations are split into two themes. *Collaboration* focuses on recommendations for the ways in which OO and EITI should work together on future projects, while *Sustainability* focuses on recommendations to support the long term continuity of the progress on BOT made during the OE programme.

Collaboration

Key recommendations

1. **OO and EITI should continue to collaborate on targeted, well-defined activities where there is clear demand and potential for meaningful impact—for example, the work on the extractives licensing manual.**

OO and EITI should maintain and strengthen their collaboration on well-defined, targeted initiatives where joint efforts are likely to yield meaningful impact. We heard multiple times how combining expertise, networks, and resources has been beneficial to both organisations.

However, given the resources required to ensure effective coordination, any future collaboration should be selective and demand-driven, focusing on opportunities that meet the following criteria:

1. There is clear demand for the type of support that both organisations can uniquely provide; and,

2. The context presents a high likelihood of impact from joint engagement.

Examples of priority areas for continued collaboration include:

- Integrating BOT into mining licensing processes, building on initial indications of the value of this work for government stakeholders in countries like Armenia. There is also an opportunity to support Armenia in making this process a legal requirement, to improve the efficiency of the country's licensing system. Future work should support government stakeholders who are actively seeking international guidance on operationalising BO data, including the design and implementation of sanctions and enforcement mechanisms. Open Ownership is well-positioned to lead in this area, given its expertise and existing resources on enforcing BOT regulation.

- Improving data verification systems in countries with existing BOT momentum, such as Ghana, Armenia, and Mongolia. In these contexts, there is a recognised need to strengthen data quality, and a clear opportunity for OO and EITI to contribute technical guidance and tools to help address verification challenges.

2. **Where EITI and Open Ownership continue to collaborate it is essential that there is consistent coordination at the country level.**

While collaboration at the senior level is effective, it does not consistently translate to operational coordination in-country. We heard that communication between country-level staff can be intermittent in some cases (but not all), with a lack of clarity about which activities fall under the banner of OE, and who is responsible for delivering them.

Where Open Ownership and EITI are to continue to collaborate, it would be beneficial to establish a more formal structure that clearly defines roles and responsibilities, and includes regular check-ins to ensure alignment. Introducing coordination mechanisms, such as monthly check-in meetings, shared progress tracking tools (e.g. Trello or MS Projects) would also help to standardise country-level communication and ensure that expectations are clear.

3. **Similarly, it is important to ensure that future work in this area (both in terms of collaboration and each organisation's activities) is appropriately resourced.**

Over the course of the evaluation we heard repeatedly that the successes of Opening Extractives have, in large part, been driven by the commitment of exceptional staff from across both Open Ownership and EITI who are willing to go above and beyond to help

advance the programme goals. However, we also heard that staff are often overstretched, and juggling many competing priorities.

This is especially relevant for EITI staff, who often have multiple priorities to cover beyond BOT, and may be responsible for supporting dozens of countries in their implementation of the EITI standard – including, but not limited to, OE focus countries.

For any work beyond the current programme to be sustainable, resourcing challenges will need to be addressed. When designing future programmes, whether as part of an exit grant or as standalone initiatives, programme managers should adopt a more conservative and realistic view of what is required to adequately resource this work.

Sustainability

Key recommendations

4. **Where operations are winding down, OE needs to identify the key stakeholders who will be responsible for maintaining BOT on the agenda.**

As operations wind down in certain countries, the programme should take proactive steps to ensure that the progress made on beneficial ownership transparency is sustained. This includes identifying the most appropriate stakeholders across government, civil society, the private sector, and relevant multilateral organisations who are best placed to maintain BOT momentum beyond the programme's engagement.

Given the recommendation that future collaboration between OO and EITI should be tightly scoped and impact-driven, it is neither feasible nor strategic to maintain OE operations in all countries. Therefore, tailored exit strategies should be developed for each country's context. These should include:

- Stakeholder mapping exercises to identify individuals and organisations best positioned to take ownership of BOT-related reforms. This should include actors from government, civil society, and the private sector, as well as multilaterals such as the FATF, Inter-American Development Bank, and World Bank, where relevant.

- Resource handover plans, ensuring that key tools, guidance materials, and roadmaps developed under the programme are made available to local actors to support continuity.

In some contexts, MSGs may serve as natural vehicles for sustaining BOT efforts. This was highlighted during the evaluation in Ghana, where stakeholders emphasised that the roadmap for further improving BO data availability and quality should be handed over to Ghana EITI following the programme's exit.[58] However, a uniform approach of defaulting to MSGs is unlikely to be effective in all settings. In countries where MSGs have limited capacity or where technical assistance remains a priority, it may be more appropriate for OO or EITI to lead ongoing efforts depending on need.

Where resources allow, OO and EITI should also consider offering light-touch, ad hoc advisory support to country stakeholders after formal engagement concludes, in order to provide continuity and technical reinforcement where needed.

5. **In some countries, securing additional funding beyond the scope of what EITI and Open Ownership offer is a prerequisite for making progress on beneficial ownership transparency in the extractives sector. Both organisations should acknowledge this and actively factor it into planning when pursuing further work in the space.**

While OE has played a critical role in advancing BOT in the extractives sector in countries such as Ghana and Liberia, making digital registries a reality will require funding that goes beyond the current scope of support offered by OO and EITI (see chapter on Efficiency).

We acknowledge that the programme has already made efforts to broker additional financial support. However, the evaluation found that persistent misunderstandings remain among stakeholders about what the programme can and cannot fund. Stakeholder expectations are often high, and OE stakeholders noted that they clearly communicated the programme's scope during the initial set-up.

Nonetheless, to avoid confusion and manage expectations more effectively in future work, both organisations should take steps to clearly and consistently communicate the boundaries

[58] Interview Ghana 3.

of their support. This should not be limited to initial engagements but should be reiterated periodically.

In addition, as the global funding environment becomes increasingly challenging, both OO and EITI may need to allocate further resources to actively supporting beneficiaries in identifying and securing complementary funding. This could involve building more partnerships with donors, offering guidance on funding proposals, or facilitating access to funding opportunities. Ensuring that implementers are well-positioned to leverage additional resources will be essential to sustaining momentum and achieving long-term impact.

Other recommendations

6. **As the programme winds down, or tightens its scope in certain countries, OE should be more proactive about finding efficient ways to communicate updates to stakeholders in-country.**

As the programme winds down or transitions to a more targeted approach in specific countries, OE should ensure that national stakeholders remain informed through efficient and locally-tailored communication strategies. Civil society organisations, private sector actors, and local consultants – particularly those not directly involved in multi-stakeholder groups – are at risk of being excluded from updates. It is important to keep these groups informed about ongoing activities (such as government efforts to integrate beneficial ownership transparency into mining licensing processes) as well as to clearly communicate when programme engagement in a country is concluding.

In those cases where work is winding down entirely, the circulation of brief, reflective close-out communications, such as a summary report highlighting what has been achieved and what remains to be done, will help provide transparency and closure. This was specifically identified as a need during stakeholder workshops.

Given the resource constraints faced by the programme, communication efforts should remain light-touch and cost-effective. Crucially, responsibility for country-level updates should not rest with global communications teams, which are already operating at full capacity. Instead, we recommend that country teams take a more proactive role in identifying and leveraging opportunities to communicate clear messaging about programme successes,

and signposting future plans to local stakeholders. The specific approach will vary by country but could include engaging with relevant events, partnerships, or existing communication channels to maximise visibility efficiently.

7. **In the closing stages of the programme, OE should also double down on ensuring that its knowledge products are visible to stakeholders.**

Over the course of this evaluation, we found limited evidence that the knowledge products produced by OE, including policy briefings and technical guidance, are used consistently by programme beneficiaries. Most people we asked said they were not aware of these artefacts, even where we shared examples and links. Therefore more needs to be done to ensure that they are visible and accessible as the programme concludes. This might involve re-circulating them at a country-level , beyond global mailing lists, and actively engaging local stakeholders – including national EITI chapters and MSGs – to support dissemination.

Similarly, in future work, it would be beneficial to more systematically track how these resources are accessed and used—data that was not available during this evaluation. More frequent use of website analytics and other monitoring tools could generate valuable insights into patterns of access, including which materials are most in demand and in which countries. This information would not only support more targeted dissemination strategies but also enable both organisations to better demonstrate the reach and impact of their publications.

Effectiveness and impact

Research questions

- To what extent did the Opening Extractives programme achieve and deliver on its stated objectives?
- What are examples of results that OE delivered? What is their importance relative to the programme's overall goals?

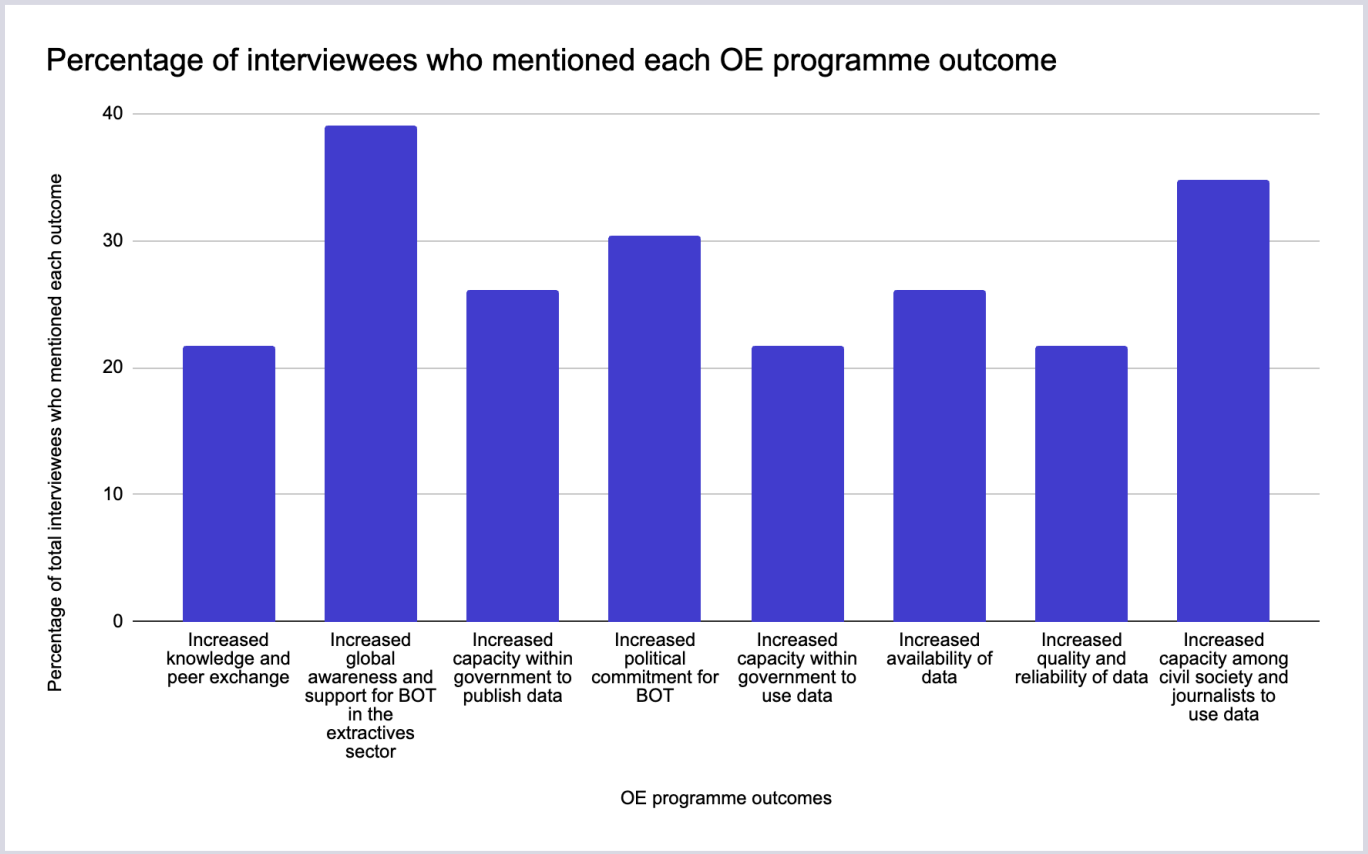
Findings

Outcome harvesting results

Drawing on findings from interviews and desk research, we conducted an outcome harvesting process to capture the outcomes achieved as a result of the OE programme's activities over the past five years.

The following chart summarises the findings from the outcome harvesting process. The graph charts the OE programme's desired outcomes, and the percentage of interviewees who mentioned each outcome at least once during their interview. As the graph below demonstrates, increasing global awareness and support for BOT in the extractives sector was mentioned by close to 40% of all stakeholders interviewed in this evaluation. Increasing capacity among civil society organisations and journalists to use data was mentioned by approximately 35% of interviewees. It is also important to note that all of the OE programme's desired outcomes were mentioned by at least 20% of the stakeholders interviewed for the evaluation. This demonstrates that the OE programme as a whole made progress across all outcomes.

Chart 1: Outcome harvesting



The following sections explore the findings on the OE programme's effectiveness and impact in more detail.

1. **Overall, most stakeholders feel that the OE programme has met its goals in their countries.**

80% of survey respondents and all interviewees expressed that they felt as though the Opening Extractives programme had met its goals overall. OE goals correspond to each of the six activity areas of the programme's Theory of Change. These are:

- Activity area 1: sustaining political commitment and stakeholder engagement for BOT reform;
- Activity area 2: technical assistance on BOT implementation;
- Activity area 3: capacity building for data use;
- Activity area 4: support development of tailored technical solutions/ tools for data use;
- Activity area 5: learning, peer exchange, and evidence; and

- Activity area 6: global communications and advocacy.

The survey suggested that the programme had been particularly effective in increasing knowledge about the value of BOT in Ghana, and Africa more broadly.[59]

Where lower effectiveness scores were given, one respondent explained that "OE has not succeeded in achieving its goals in Senegal as BOT has at best stood still during the period."[60] This is a clear example of the delayed impact of the work conducted by the OE programme. OE worked closely with the government of Senegal to develop a draft decree on the development of a public BO registry, which was only approached in July 2025 (after the survey was circulated).[61] Because the process was lengthy, some local stakeholders may have felt that progress "stood still" for several years. The recent passage of the decree, however, removes a major barrier to the next steps of reform.

A survey respondent from Zambia expressed a similar point, saying that although they felt as though the OE programme had made progress across its goals, their country had not yet reaped all of the benefits of the work.

> **"The programme made positive progress towards realising these goals, despite its limited duration. Given the level of systemic change required for some of the programme's goals to be realised, this will happen well beyond the programme's period of implementation, especially if efforts made are sustained."**
>
> **Survey respondent, Zambia**

2. **One of the OE programme's most effective areas of work has focused on providing technical assistance to support legal reforms. Over the past five years, at least 9 countries involved in the programme have either proposed or passed laws and regulations in support of BOT.**

The OE programme does not engage in lobbying; instead, it provides technical support to stakeholders who are already pursuing legal reforms.[62] This approach has contributed to

[59] Survey respondent.
[60] Survey respondent.
[61] https://www.presidence.sn/en/actualites/cabinet-meeting-of-wednesday-july-16-2025
[62] Funding from the BHP Foundation cannot be used to support lobbying activities.

progress on legal frameworks and regulations across multiple regions. Following support provided by OE, in August 2023 Liberia published its regulation on the declaration of beneficial ownership information for domestic entities. The regulation provides for the collection, processing, verification, maintenance, publication, and accessibility of beneficial ownership information for these entities. An interviewee shared that it was consultatively drafted in accordance with the Business Corporations Act of 2020.[63]

In Ghana, interviewees shared that OE had worked with the Office of the Registrar of Companies to release new regulation on how to implement the BOT law which had been passed before the programme began. The development of this new regulation will mean that the BOT law can actually be implemented in Ghana. An interviewee referred to this work as "the most important contribution of the programme in Ghana".[64]

In Zambia, the OE programme also helped to build capacity for Patents and Companies Registration Agency (PACRA) technical staff across ten provinces and strengthened BOT mechanisms. As a result of building this capacity, PACRA is now in the process of undertaking legislative reforms, including amending the Companies Act to improve the implementation and compliance of BO reporting. The OE programme also worked with PACRA to identify gaps in their existing law.[65]

In Asia, the Philippines, Mongolia, and Armenia have made important progress on legal reforms and regulations with the support of OE. In the Philippines, OE helped BOT reform to be included in a fiscal regime bill, which has been signed into law.[66] This progress, an interviewee explained, came about through OE's initial engagements in providing talking points, suggestions, and proposed amendments to the draft bill as it was going through the House.[67] In the words of another interviewee:

"One of the programme's biggest achievements in the Philippines was successfully

[63]Interview OE 1,
[64]Interview Ghana 1.
[65]OE Progress Report 2022-2023, p.15.
[66]Erika Mae P. Sinaking, "New fiscal regime for mining industry signed into law," *Business World*, 5 September 2025. https://www.bworldonline.com/top-stories/2025/09/05/696011/new-fiscal-regime-for-mining-industry-signed-into-law/
[67]Interview OE10.

incorporating a provision on beneficial ownership transparency into a fiscal bill. While the country currently has a closed BO register, this provision, if passed, would enable public access to BO information specifically for extractives companies through the fiscal regime. The bill is still pending, but its inclusion represents a significant step forward for transparency in the sector."[68]

Interview OE4.

In Armenia, interviewees shared that OE helped with 2023 legislative reform to require all companies to publicly disclose their beneficial owners. As an interviewee shared, "In 2023, the government –through the Ministry of Justice– amended the law to allow full public disclosure of beneficial owners for all companies. The OE programme played a key role by providing technical support in both framing the legislation and implementing the BO register."[69] An in-country interviewee in Armenia said that making BOT a legal requirement has helped the push towards more transparency in their sector. "It helps people like us within the industry, because our industry is a bit conservative, so there are always internal battles on what is the extent of the transparency."[70]

Finally, in Latin America, Argentina passed a new anti-money laundering (AML) law in 2024 and created a central BO register under the country's tax authority. However, the data in the registry is protected, and therefore cannot be shared or published publicly. Through a participatory process OE supported the development of regulatory amendments to promote voluntary disclosure of BOT data in the mining and hydrocarbons sectors in Argentina.[71] These proposals received backing from two vice-ministries but were not implemented due to a change in government.

3. **Over the course of the programme, the availability of BO data has significantly increased in some countries. However, in others, the programme has faced challenges in improving the availability of BO data, largely due to external factors.**

[68]Since this interview took place, the fiscal regime bill has been passed in the Philippines.
[69]Interview OE 4.
[70]Interview Armenia 1.
[71] Interview Argentina 1.

Overall, several of the countries involved in the OE programme achieved significant progress in improving the availability of BO data. However, in others, stakeholders expressed frustration about slower progress over the past five years. The responses to the survey, summarised above, show this varied landscape.

Over 70% of respondents said that they felt the OE programme has improved the availability of BO data in their country or region. Only a minority (15.8%) indicated that they felt their country had made limited to no progress on data availability.

Some of the countries that have seen the most progress in data availability over the course of the programme include Armenia, Liberia, and Ghana. By 2023, Armenia launched a public beneficial ownership register covering around 120,000 legal entities, expanding disclosure requirements across the entire economy. The register, which exceeds EITI requirements, started through the OE programme as a register just for the extractives sector.[72] In the words of an interviewee, the register expanded "because of successes it achieved in terms of implementing BOT in the extractives [sector]".[73]

In addition, Armenia has also adopted Open Ownership's Beneficial Ownership Data Standard (BODS), and has become one of the first countries to implement this open standard for collecting, sharing, and using high-quality data on company ownership. The OE programme also supported Armenia in developing verification checklists to improve the reliability of BO data.[74] As an interviewee explained, Armenia made significant progress because of the country's significant commitment to multiple aspects of implementation, with government and civil society organisations involved in it together.[75]

Liberia made progress in data availability with the launch of its new beneficial ownership (BOT) register in 2023. Although still manually operated, there are plans to digitise the system.[76] As an interviewee shared, "in Liberia, although the digital register is still a work in progress, manual data collection is underway and there is strong momentum through both

[72]Interview OE4, OE7.
[73]Interview OE4.
[74]Interview OE7.
[75]Interview OE11.
[76]OE Progress Report 2022- 2023, p.4, Press Release: Liberia launched a new digital beneficial ownership register.

IMF and EITI channels."[77] This is significant because when the programme began its engagement in Liberia, the country did not have any work on BOT in progress, showing that "good things can come from a small place."[78]

In Ghana, though the country already had a BO register when OE began, the country has improved data availability with the support of the programme. Interviewees from Ghana shared that over the past five years, BO data sharing across agencies has increased. Specifically, OE's technical support made it possible to share BO data between the Registrar General's department and the Minerals and Petroleum Commissions.[79]

In other countries, however, as the survey results demonstrate, there have been fewer acknowledged improvements. In reference to Zambia, a respondent wrote that they felt that despite the efforts of the programme, "there is still a lot to be done for BO information to be made publicly available." [80] Another survey respondent from the same country expressed that though progress on BOT was made in other sectors, the extractives sector still lags behind.

> ***"Much of the data availability has been in relation to the wider economy generally, while the extractives sector remains largely opaque in terms of the ultimate BOs. Company data declared is unverified and large sections of the sector where PEPs operate, i.e. small scale mining, is not covered by the Companies Law which requires BO declaration."***
>
> **Survey respondent**

In addition, survey respondents from Senegal expressed that they felt like BO data availability had not improved in the country. As a respondent wrote, "it is difficult to identify any tangible progress in the availability of BO data during the period of the OE programme in Senegal. The most recent EITI report includes information on direct legal rather than beneficial owners, which seems to be a step backwards from previous reports. There is a route to request BO information from RCCM [Senegal's Trade and Personal Property Credit Register], but no evidence that this has been used."[81] As OE's work in

[77]Interview OE1.
[78]Interview OE1.
[79]Interview Ghana 1.
[80]Survey respondent.
[81]Survey respondent.

Senegal primarily focussed on the development and passage of the draft decree, it is understandable that the country made negligible progress in data availability. Now that the decree has been passed, data availability is likely to improve in Senegal in the future.

Finally, even in places where data availability increased, stakeholders were split as to whether these changes could be directly attributed to OE. In Armenia, for example, some stakeholders said that OE workshops held in Yerevan led to changes to the mining licensing process which in turn have increased BOT data availability.[82] However, other interviewees stressed that the broader movement around BOT in Armenia was well underway before OE began, and they felt that expanding the BO register to cover all sectors would likely have happened with or without the programme.[83]

4. **In some countries, governments and civil society organisations are already effectively using BO data, and stakeholders across the board are optimistic about the potential for future impacts from BO data use.**

Nearly 90% of survey respondents expressed that the programme had somewhat improved, improved, and significantly improved the capacity of government and civil society organisations in their country to use BO data.

The OE programme's work on BOT in mining licensing is one area where governments are beginning to incorporate BO information into their due diligence investigations. In Armenia, the OE programme trained government stakeholders in how to use information from the state BO register as part of their routine investigations, who then applied what they learned to conduct research on a company as part of its application for a mining license.[84] More detail on this can be found in the Armenia case study in the Overarching Findings section.

The full impact of the work on mining licenses is still yet to unfold, as the manual is due to be published towards the end of 2025, and piloting its use in multiple contexts is yet to take place, while testing has taken place. Interviewees expressed that this work is a direct benefit of the collaboration between OO and EITI, as it combines OO's BOT expertise, and EITI's

[82]Interview Armenia 2.
[83] Interview Armenia 1, Workshop participants.
[84]Interview Armenia 2.

expertise in licensing.[85] As an interviewee expressed,

> ***"I think we're at a point now where there is a much broader understanding among EITI countries of what BO information is and what it can do for licensing and contracting decision makers."***
>
> **Interview OE3.**

The evaluation found multiple examples of data use by civil society organisations and journalists in practice. In Ghana, a civil society organisation (NOPRA) used BO data to investigate a company and found that its beneficial owners had criminal records, leading to the company being blocked from doing business in Ghana. This investigation was published with support from OE training for journalists (see Overarching Findings section for more detail). More broadly, the programme has trained over fifty journalists and CSOs, and this capacity-building effort has led to the publication of 7–8 investigative reports which have shined a spotlight on issues within the public sector.[86]

In Mongolia, the OE programme supported the CSO Mongolia Data Club, along with Open Society Forum, to organise a five-month training programme. The programme focused on strengthening the data analysis capacity of journalists and data scientists, with a priority on BOT, government spending and procurement processes.[87] One of the groups involved in the training investigated one of Mongolia's government resolutions, which gives mining companies the right to issue C-permits, which authorise coal transportation companies to transport coal between Mongolia and China. The investigation found that one third of the permits issued between January and February 2023 were for companies ultimately owned by Political Exposed Persons (PEPs) and foreign company owners.[88] Research helped hold the government accountable for its allocation practices. Though this did not lead to a direct impact, it contributed to the country's ongoing anti-corruption efforts.[89]

In Armenia, both NGO and government participants in the workshop flagged that CSOs are actively using BO data, and uncovering anomalies, which is helping to make the case for more

[85] Interview OE2.
[86] Interview OE7.
[87] Policy brief, Lessons for an accountable transition, p. 30.
[88] Policy brief, Lessons for an accountable transition, p. 30.
[89] Policy brief, Lessons for an accountable transition, p. 30.

robust verification mechanisms. Following some capacity building workshops for CSOs and journalists, participants published seven investigative articles on different economic sectors, combining BO data with information on tax and royalty payments, along with PEPs.[90] Media reports in Armenia have continued to highlight the involvement of PEPs in the extractive sector.[91]

In addition, in Argentina, an interviewee shared that a network of journalists are working with BOT data to uncover stories related to beneficial ownership in the mining sector.[92] These projects raised awareness of both BOT and the EITI at the subnational level, and were particularly relevant for calling attention to BO in a complex context where the issue was still not generally known or understood.

Finally, in Zambia, the non-profit Centre for Trade, Policy and Development (CTPD) commissioned a site that could be used to search for the BO information declared by different companies.[93] When testing the site, the centre discovered that a government official who was just coming into office was one of the directors of one of the companies listed on the site. The company had not met Zambia's legal requirements for disclosing its beneficial owners.[94] The CTPD brought this information to PACRA, the agency that would be responsible for investigating the company's lack of compliance with BO requirements. Workshop participants asserted that PACRA ultimately decided not to launch an investigation, reasoning that doing so could jeopardize long-term progress on BOT by undermining political support for ongoing reforms.[95]

This example highlights the political sensitiveness of BOT, and the importance of other reforms to protect government officials who expose instances of conflicts of interest, including whistleblower protection, and job protection for those working at agencies using BO data.

5. However, in many countries, improving data use was both challenging and

[90]OE Progress Report 2022- 2023, p.8.
[91]OE Progress Report 2022- 2023, p.8.
[92]Interview Argentina 1.
[93]Interview Zambia 1.
[94]Interview Zambia 1.
[95]Workshop.

resource-intensive, and did not lead to longer-term systemic change in the same way as other areas of OE's work, such as legal reforms.

The OE programme faced multiple challenges improving data use across many countries, including a lack of data availability, low levels of stakeholder understanding of BOT, and difficult political environments.

Both interviewees and survey participants shared that they felt a lack of data availability was hindering data use in their country. As an interviewee expressed,

> ***"One of the hardest things was to get data to work with. We wanted to get tools and data visualisations, and often, even in Africa, the data wasn't there."***
>
> **OE interviewee**

Some survey respondents shared similar perspectives. As a respondent expressed about Senegal, "the absence of effective access to BO data, including through EITI, means that the use of that data by anyone other than government remains very limited, and there is no direct evidence of government using the data."[96] The passage of the decree in July 2025 to develop a public BO register will likely help to improve data use in Senegal in future.

A survey respondent from Zambia expressed that while they felt as though the programme's support for data use had been effective with the stakeholders they engaged, there was more that OE could have done to build capacity outside of major urban areas. "Much of the programme intervention rests here. However, the said stakeholders are mainly in major cities. Much more can be done to extend reach… CSOs and citizens' use of data remains insufficient, although the media's use of data has been more encouraging."[97]

Elsewhere, stakeholders in Argentina expressed that even with a register they were skeptical that civil society data use would significantly increase, because they felt BOT is too technical a topic to be widely understood and not necessarily a priority for CSOs.[98]

In addition, data use projects were resource-intensive for the OE programme to support and

[96]Survey respondent.
[97]Survey respondent.
[98]Interview Argentina 2, Argentina 3.

scale. The OE programme's goals for data use projects was to support a few initial projects which would show what was possible by using BO data, with more people and organisations subsequently beginning to work with the data that was available. Supporting data use projects, however, was very time intensive for OE, and the programme did not have the capacity to do the large scale, "train the trainers" initiatives that would be necessary to expand this work and make it sustainable. [99]

In addition, the OE programme faced some challenges with the data use projects that they funded. OE made a significant investment of 150,000 USD into *Joining the Dots*, a platform which combines BO information, lists of Politically Exposed Persons (PEPs), and mining licensing information, to monitor links between politicians and mining licenses;it continuously and automatically raises the red flags it finds.[100] However, as an OE staff member shared, the platform made some local stakeholders nervous, stating that the OE programme was "indirectly putting a target on their back."[101] The OE programme had to work to reassure local stakeholders that the platform was just combining information that was already publicly available. As a result, the platform did not have the level of use and uptake that was expected. The resulting lesson was that the approach to framing platforms like this is very important, and it is important to carefully present them as a method to improve the enforcement of government ancri-corruption policy, as opposed to a tool for targeting all politicians.

The OE programme also faced some challenges in directly funding CSOs and journalists to conduct investigations using BO data. OE staff shared that these small scale, direct grants created some tensions and the potential for indirect conflicts with the EITI MSG. As a result, the OE programme chose to stop giving direct grants to journalists and CSOs, in order to mitigate potential legal risks.[102] In addition, though this direct support was effective in helping the OE programme collect tangible examples of BO data use, it does not lead to the same type of long term, sustained impact as other areas of OE's work, such as legal reforms.

6. **Though OE has seen some success in improving data quality, specifically in Ghana,**

[99] Comments on the first draft received from OE11.

[100] https://www.openownership.org/en/blog/closing-the-loop-how-beneficial-ownership-information-is-used-and-why-it-matters/

[101] OE internal team, findings workshop

[102] Insights from OE feedback workshop, August 2025.

in many contexts it has proven challenging .

Survey responses showed that improving data quality is one of the areas that the OE programme struggled in the most. Only 10.5% of respondents said that the OE programme had significantly improved data quality, while the majority (63.6%) of respondents said that the programme has somewhat improved or improved the quality of BO data. Overall, respondents scored the improvements in data quality lower than other areas of OE's work.

However, interviewees in Ghana did stress that the OE programme had significantly helped them to improve the quality of BO data. An interviewee shared that before the OE programme, BO data in Ghana was only collected on spreadsheets in order to comply with EITI requirements. As a result of the programme's efforts, the data is now integrated into the Registrar Generals' system (GCNET) and collected systematically.[103] The same interviewee said that OE's capacity building work to train civil servants in the Register General's department on the difference between a shareholder and beneficial owner was particularly helpful, and that now the BO data collected in Ghana contains both fields.[104]

Some survey respondents gave a measured response when asked about OE's work to improve data quality, acknowledging that progress had been made through OE but also that there is still work to be done to improve data quality. A respondent from Zambia wrote:

> ***"Through its work with PACRA, the programme started to push for the maintenance of BO data by PACRA. The quality of this data, however, is something I cannot speak to confidently. Based on our last interaction with the data, there were still gaps in terms of maintaining adequate BO data."***
>
> **Survey respondent**

A survey respondent from Indonesia praised the OE programme's provision of examples of international best practice to help the country improve the quality of their BO data. However, the respondent expressed that "none of them have been adopted by Indonesia until the end of the programme."[105]

[103] Interview Ghana 1.
[104] Ibid.
[105] Survey respondent.

Overall, improving data quality seems to have been a challenging aspect of the programme, and even in countries that have made progress, there is still room for improvement.

7. **A key achievement of the OE programme is that it has succeeded in putting BOT on the agenda in some contexts where it was not well understood beforehand**.

Survey responses demonstrated that the majority of stakeholders (61.1%) felt that the OE programme had improved or significantly improved political commitment to BOT in the extractives sector in their country.

A respondent from Ghana shared that they felt the OE programme has "ensured increased commitment by government officials to disclose beneficial ownership,"[106] and another respondent shared that OE secured greater buy-in from high-level government officials in Armenia, who are now participating more often in meetings on these topics.[107] Stakeholders in Zambia also expressed optimism about the level of political commitment to BOT in their country, for example:

> ***"[the] Government has maintained and renewed the formal relationship, through the Ministry of Mines, with the Opening Extractives programme. The recent legal requirement for all public entities to demonstrate use of BO data in procurement is a clear example of the political will. What may be key is to sustain it, regardless (of) regime change and to show progress on reforms…"***
>
> **Survey respondent**

8. **Most OE countries have made positive progress on the Open Ownership Principles and EITI Requirement 2.5, with only a few exceptions.**

The Open Ownership Principles provide a framework to guide governments in implementing effective beneficial ownership transparency reforms, focusing on the quality, reliability, and usability of BO data.[108] The nine principles cover three key areas: data collection and

[106] Survey respondent.
[107] Survey respondent.
[108] *Open Ownership*, "Principles for effective beneficial ownership disclosure," https://www.openownership.org/en/principles/

disclosure (Definition, Coverage, Detail), storage and accessibility (Central Register, Access, Structured Data), and data quality and reliability (Verification, Up-to-date & historical Records, Sanctions and enforcement). A full breakdown of the principles and their definitions is available on Open Ownership's website.

Improving scores across these principles indicates progress in the quality and usability of BO data. While the OO Principles are not extractives-specific and some assessment shifts reflect updates to the framework, they remain a useful tool for analysing country improvements.

Most OE countries have seen improvements in their OO Principle scores during programme engagement, though some gaps persist. The diagram below shows changes in each country's scores compared to the baseline (or year 2 for some). Positive numbers indicate score increases, zero indicates no change, and -1 or -2 indicate a decline in the most recent assessment. The information in the table is drawn from programme reporting documents.[109]

[109]OE Country Status Reporting 2024, p1.

Table 1: Change in country scores across the OO Principles, from baseline to 2023-2024

Change in scores in the OO Principles, from baseline to 2023-2024										
Country	**Definitions**	**Coverage**	**Detail**	**Central**	**Access**	**Structured**	**Verified**	**Auditable**	**Sanctions**	**Total change**
Argentina	2	1	1	2	2	-1	-1	0	1	7
Armenia	0	2	0	1	1	0	1	-1	2	6
Ghana	0	-2	3	1	0	2	1	1	1	7
Indonesia*	0	0	0	1	0	1	1	0	1	4
Liberia	3	0	3	4	4	3	2	4	4	27
Mongolia*	0	0	0	0	1	-1	0	0	0	0
Nigeria	0	0	0	3	0.5	0	-1	1	1	4.5
Philippines *	0	0	0	1	1	1	0	1	1	5
Senegal*	0	0	0	0	0	0	0	0	0	0
Zambia	0	0	0	0	0	-1	-1	-1	0	-3

*baseline assessment conducted in year 2

Legend: = positive change, = no change, = negative change

Some countries have made substantial improvements across the OO Principles during the programme. Liberia, for example, started with very low alignment but increased its scores by 2–4 points across nearly all areas. Argentina and Ghana also demonstrated notable progress, scoring higher in nearly all metrics in their most recent assessments.

In contrast, some countries showed limited or uneven progress. Senegal recorded the same scores in 2023–2024 as at baseline, while Zambia maintained most scores but declined on three key metrics—Structured, Verified, and Auditable data—compared to its pre-programme baseline, highlighting persistent gaps in data quality and usability. The assessment found that Zambia's BO data required registration and payment in order to access, and there were also

discrepancies in BOT thresholds and mixed quality data, ultimately contributing to Zambia's drop in score.

The programme also aimed to support countries in meeting EITI's Requirement 2.5 on beneficial ownership transparency. Most OE countries have made progress in this area, though some gaps remain. Note that a full longitudinal analysis here was not possible since we do not have access to baseline data.

The table below summarises the extent to which OE countries have met key aspects of Requirement 2.5 as of 2024, focusing on the following indicators:

- Agreement on a BO definition aligned with the EITI standard
- Inclusion of Politically Exposed Persons (PEPs)—public officials at higher risk of corruption—with disclosure obligations
- Disclosure thresholds set by jurisdictions
- Public availability of the register
- Existence of an enabling legal or policy framework (enacted, draft, or none)

As some elements of Requirement 2.5 overlap with the OO Principles, the following table focuses on aspects not captured in the previous diagram.

Table 2: Country progress in meeting EITI Requirement 2.5 on beneficial ownership transparency (2023 - 2024)[110]

Country progress in meeting EITI Requirement 2.5 on beneficial ownership transparency (2023-2024)*						
OE Countries (2024)	**Agreement on a Definition Aligned with the EITI Standard (Y/N)**	**Are PEPs defined? Y/N**	**Are there reporting obligations for PEPs? Y/N**	**Threshold used (%)****	**Is the register publicly available?*****	**Is there an enabling legal/policy framework? (Enacted, Draft, None)**
Ghana	Yes	Yes	Yes	11%-24%	Yes	Enacted
Liberia	Yes	Yes	Yes	5%-10%	n/a	Enacted
Nigeria	Yes	Yes	Yes	5%-10%	Yes	Enacted
Zambia	Yes	Yes	0	25% or above	Yes	Enacted
Senegal	Yes	Yes	Yes	Less than 5%	No	Enacted
Indonesia	Yes	No	No	25% or above	Yes	Enacted
Mongolia	Yes	Yes	Yes	5%-10%	Yes	Enacted
Philippines	Yes	Yes	Yes	5%-10%	Yes	Enacted
Armenia	Yes	Yes	Yes	5%-10%	Yes	Enacted
Argentina	Yes	Yes	Yes	5%-10%	No	Enacted
Ecuador	No	Yes	Yes	25% or above	Yes	Draft
Colombia	Yes	Yes	Yes	5%-10%	No	Enacted

** According to the 2023 EITI Standard, implementing countries are encouraged to adopt an ownership threshold of 10% or lower for BO reporting.

*** According to the 2023 EITI Standard, this requirement ensures the public accessibility of comprehensive information on property rights related to extractive deposits and projects.

When comparing data from 2023 and 2024 (the two years for which we have 2.5 alignment

[110] *EITI,* Stock take on EITI Requirement 2.5, 2024. *EITI,* Stocktake on Requirement 2.5, 2023.

data), Mongolia and the Philippines demonstrated notable progress. In Mongolia, the BO register became electronically accessible to other government agencies in 2024. In the Philippines, the ownership disclosure threshold was significantly lowered, from 25% (per a 2023 memorandum circular) to 5–10% in 2024.

In contrast, Indonesia showed limited progress, particularly in strengthening obligations related to PEPs and in adjusting disclosure thresholds, which remain restrictive. Although no BO information was gathered through the 2023 EITI reports, Ghana, Zambia, and Argentina began systematically collecting such data in 2024. This marks a significant development, as EITI Requirement 3.1 emphasises systematic disclosure—defined as the routine, timely, and publicly accessible publication of information through official government or company channels.

Moreover, all reviewed OE countries, with the exception of Ecuador, have enacted legal frameworks to support BO transparency. Ecuador remains in the drafting stage and notably lacks definitions for PEPs and beneficial owners within the EITI process.

Lessons

1. **Targeted technical support for legal reforms has played a key role in helping OE to meet its objectives.** In Armenia, embedding BOT in law created a sense of irreversibility among stakeholders; progress could not be rolled back. This foundation not only consolidated initial reforms but also enabled more advanced steps, such as the use of BO data in licensing due diligence research. OE has also helped countries like Liberia and Philippines embark on similar trajectories—albeit at an earlier stage and in different contexts—laying the groundwork for future progress.

   By contrast, in Indonesia and Ecuador, the absence of a legal framework has stalled momentum on BOT despite interest from stakeholders. **Evidence shows that while laws are not sufficient on their own, they are often the turning point in the Theory of Change, providing the stability for countries to advance from early adoption to system-wide reform**

2. Opening Extractives' **work on extractives licensing screening is already proving useful to governments**, who are using BO information as part of routine investigations.

   This area of work seems very promising for future impact. **OE should continue to focus on this area** in the exit grant period and, if possible, beyond, to ensure progress and impact are sustained. For example, this might include working to get the use of BO information legally adopted into the mining licensing process in Armenia, which stakeholders highlighted as an important next step.

3. As the evidence from Zambia illustrates, even when BO data is used to find instances of lack of compliance with laws and regulations, **this does not necessarily mean that action will be taken** to investigate the companies involved. Some BO data, particularly where PEPs are involved, can be highly politically sensitive, and it is vital to ensure that reform is accompanied by whistleblower and job protection for agency officials, if conflicts of interest are to be exposed.

Relevance

Research questions

- Has the Opening Extractives programme, in the country context, delivered on the stated objectives of the work plans?
- Did the national beneficial ownership objectives address actual governance challenges, and national priorities?

Findings

1. **All interviewees and survey participants said that OE programme activities were relevant to national and local priorities.**

In the survey, 100% of respondents said that the OE programme was at least somewhat aligned with the priorities of their country and region. The vast majority (84.2%) said that the programme was either aligned or very aligned to these priorities.

A respondent from Zambia expressed that they felt it especially important to political priorities in the country, and to wider obligations to multilateral organisations providing funding, such as the International Monetary Fund (IMF).

> ***"The promotion of BOT is one of the areas identified as a strategic intervention toward promoting transparency and improved fiscal management in the country's IMF Extended Credit Facility programme. Further, Zambia loses resources through illicit financial flows and corruption. BOT would help the country identify the individuals behind such transactions, which are often concealed behind corporate veils. The activities of the OE programme were therefore highly relevant to Zambia's priorities."***
>
> **Survey respondent**

In addition, interviewees expressed that they considered the OE programme highly relevant to local government priorities. This came across particularly strongly in Argentina, where an interviewee expressed that subnational governments are beginning to see BOT not just as an issue of compliance, but as something that can help them to move forward, achieve their goals, operate more efficiently, and help them secure international investments: "Discussions have increasingly emphasized long-term implementation, with subnational actors actively considering how these initiatives can support their progress towards the Sustainable Development Goals and broader governance commitments."[111]

Conversely, some survey respondents expressed that while they felt as though the programme's focus on BOT was highly relevant to their context, challenges in implementation hindered progress. This came across most strongly among respondents from Senegal. As one wrote, "while the OE programme is highly relevant to Senegal, the lack of continuity and follow up has limited its effectiveness."

2. **Whilst it is clear that work plans were explicitly tailored to local contexts, we heard of some instances where stakeholders could have been better identified or engaged from the beginning.**

[111] Interview OE6.

One survey respondent said that while the programme was "highly relevant," they felt as though the support and capacity building provided by the programme "was not in line with country progress (as) stakeholders involved were not well identified."[112] During the workshop, stakeholders shared that in Indonesia, the programme's emphasis on technical assistance has primarily engaged technically skilled, but relatively junior, government officials. This has improved technical capacity, but led to blocks in decision-making as high-level stakeholders were not involved.

In Ecuador, OE initially struggled to engage with the EITI MSG, which created broader challenges in securing support from other government agencies. At the start of its work, the programme reached out to the MSG but received little response. Without meaningful engagement from the MSG, OE then turned to the Superintendence of Companies, as an OE signatory. However, the Superintendence soon disengaged from implementation, further delaying and complicating progress. OE also approached Ecuador's Internal Revenue Service, which was developing its own registry but was opposed to making it public. According to one interviewee, stronger engagement with the MSG at the outset might have improved the programme's chances of securing buy-in from other government stakeholders, fostering a more cohesive approach that would have avoided fragmented efforts to engage different agencies.

3. **The relevance and quality of the contributions of local consultants seems to have varied across countries. In some cases, interviewees flagged that local consultants were important to ensuring that all activities were relevant to local priorities. However, survey results indicate that not all consultants were equally knowledgeable, which affected the quality of outcomes.**

Interviewees in Ghana, highlighted the input of local consultants, saying that they received "tremendous support by the provision of technical assistance, and consultants."[113] This view was not shared by all. One respondent from Senegal said that they felt as though experienced BO experts were "spread too thinly" in the programme, as these experts often had competing responsibilities with other OE countries. They added that they felt OE filled

[112]Survey respondent.
[113]Interview Ghana 3.

this gap with "very junior local consultants with little or no BO expertise."[114] Another survey respondent added more detail:

> ***"Many of the requests for proposals issued under the programme requested junior or inexperienced consultants. Such requests were combined with low budgets for the scope of work being proposed. This limited the ability of the countries in the programme to access experienced and high-quality consultants who could have enhanced the ability of the countries to make substantial progress towards BOT."***
>
> **Survey respondent**

Lessons

1. While some in-country consultants have been very valuable to local partners, others have been less helpful. When considering bringing on board local consultants in the future, **OO and EITI could consider implementing a probation or test period for consultants**, and **solicit feedback from partners on their performance**, to help ensure they are bringing value.
2. When beginning work in a new country, region, or city, stakeholder mapping is an essential part of the process. It is important to make sure that **all relevant people and organisations, including the local MSG, are identified and actively engaged** so they are bought into the work.

[114] Survey respondent.

Coherence

Research questions

- How well did the Opening Extractives programme fit into other or similar interventions in the country, which share similar objectives?

Findings

Across the board, the evaluation found that the Opening Extractives programme has succeeded in aligning and collaborating with other national, regional, and global interventions, which often led to further benefits for programme stakeholders. The following points explore these findings in greater detail.

1. **OE has helped countries improve their standing with other multilateral institutions, promoting good governance in the extractives sector.**

One of the clearest instances of this was in Liberia. As a result of the Opening Extractives programme's work in the country, Liberia is starting to collect BOT data for the first time, and is in the process of working towards a register. In their most recent diagnostic, the IMF acknowledged Liberia's progress, which led to Liberia improving its standing in the IMF's assessment. As an interviewee expressed:

> ***"I don't think the IMF would have seen something tangible or existing without OE. It's a really solid win. We're still yet to have the register operationalised, but they are collecting data manually and working towards an online register. It's another big win."***
>
> **Interview OE1**

Additionally, the OE programme in the Philippines has helped the government strengthen their commitments to BOT as part of the 2023 Open Government Partnership National Action Plan. To do this, the OE programme provided inputs to the Department of Finance.

This then led to opportunities for OE to help build capacity for government stakeholders in the Philippines around legislative and policy reforms to support BOT.[115]

Along with in-country work, the OE programme has also been instrumental in encouraging other multilateral institutions to put BOT on the agenda. The OE programme collaborated with FATF and the IMF to establish BOT as a core element of anti-money laundering requirements. As an interviewee expressed, this "also increased EITI's international exposure and engagement in anti-corruption efforts."[116]

2. **OE's efforts to convene government stakeholders and external multilateral organisations have helped build support for BOT, but translating momentum from events into practical implementation is not always guaranteed.**

The evaluation found that the OE programme has been particularly successful in bringing together government partners and multilateral institutions to strengthen BOT commitments. As outlined below, these events are particularly valuable in allowing stakeholders to share practical tips and tangible lessons they have learned with others working on the same reforms, which can help stakeholders overcome technical challenges. In addition, global peer exchanges help stakeholders see what is possible in other countries, seeing that the reforms are feasible in similar contexts.

A clear example of this was in Argentina, where OE organised a workshop in 2023 which brought together government stakeholders from across the region, along with the InterAmerican Development Bank, to discuss BOT. The two main purposes of the meeting were to build the regional network in Argentina around BOT, and also to bring together organisations working on similar issues who had never worked together. As an interviewee shared, "that definitely helped in bringing more support and less reluctance to disclosing information."[117]

A key moment in 2023 was the Global EITI Conference in Dakar, Senegal, where *Opening Extractives* hosted a Global Peer Exchange, bringing together stakeholders from all implementing countries. The event featured a focused discussion on Francophone Africa, with

[115]OE Progress Report 2022-2023, p14.
[116] Interview OE10.
[117]Interview OE14.

delegates exploring ways to advance BOT in the years ahead. In parallel, stakeholders from Senegal considered how recent political commitments to BOT could be turned into practical action. However, feedback indicated limited tangible progress on BOT in Senegal since, highlighting the challenge of translating global events into real-world change.

3. **Government stakeholders feel they have significantly benefitted from OE's support in providing exposure to international best practice.**

Over 80% of survey respondents said that they felt as though the OE programme had been successful in driving forward international debate and knowledge-sharing regarding BOT. In their comments, survey respondents expressed that this was one of the areas of the programme's work that they found particularly valuable.

As one survey respondent wrote, these activities, "should continue to be carried out in the future, because from the participant's experience, this activity is very useful for them to share experiences and find solutions to the challenges faced by each participating country."[118] Another survey respondent said that they wished that the OE programme had supported even more international exchanges between implementing countries.

Multiple interviewees also spoke about the value of OE's international exchanges, and in particular the peer learning events organised by the programme. These events often directly influenced government officials to advocate even more for BOT reforms. A three day multilateral peer exchange event in July 2022 for Anglophone African countries, for example, helped in building technical capacity and increasing public awareness of BOT in Liberia. In part inspired by these efforts, the country launched its first central, public BO register in September 2023.[119] In addition, OE held a successful peer learning seminar in Buenos Aires in 2023 which also opened the gates to more collaborations with different organisations.

As another example, after a peer learning exchange event in Africa, the Register General of Nigeria became interested in work being done in Ghana on state owned enterprises. As one interviewee shared:

[118]Survey respondent.

[119]OE Progress Report, 2022 - 2023.

> ***"The Register General of Nigeria of the Corporate Affairs Commission literally picked it up and said we need to include that in our regulations, and right now it's in the 2021 legislation. There's some tangible things in terms of allowing people to speak to each other, and not being a mediator or a transcriber."***
>
> **Interview OE1**

Similarly, Colombian government officials benefitted from their participation in an OE global peer exchange on embedding beneficial ownership transparency in licensing processes, held in Oslo in November 2023. At the event, countries shared about the progress they had made, how they were practically implementing the reforms, and discussed common challenges. In the words of an interviewee:

> ***"We had a couple of OE events in Oslo and virtually on extractives licensing and how to use BO information for improving the licensing process [...] Without that exchange, stakeholders wouldn't have been able to see the issue and how other countries are addressing it. Seeing examples from Africa and Asia showed Colombian stakeholders that the approach works in other regions and that it is doable. The challenge is legal, a difference between common law and civil law, which made things clearer and helped me a lot because it allowed me to showcase internally what I had been saying for a while."***
>
> **Interview OE6**

The peer exchange also gave OE the chance to hear from countries about a range of factors, which helped to inform the programme's decisions about where to prioritise the work on mining licensing.[120] The event produced direct insights from countries about the technical, institutional, and political factors in place, which helped OE understand which countries had the most promise of success and opportunities for learning.[121]

Some of the key factors OE observed at the event were levels of political will, concrete engagements and progress on BOT more broadly, and institutional and technical conditions in the countries.[122] As a result of the event, OE identified Zambia, for example,

[120]Information shared by OE in comments on first report draft.
[121]Ibid.
[122]Ibid.

as a good candidate for the mining licensing work based on their plans for digitalising and interconnecting various government systems including the Mining Cadastre and the BO registry. Ghana was also identified as a good candidate because of their favourable legal frameworks and public access to BO data. On the other hand, Colombia was not prioritised for the mining licensing work because significant obstacles were raised including access by agencies to the central registry.[123]

The sessions in the peer exchange were planned and run in a way which helped to surface these conditions.[124] They also included representatives from both the extractive agencies and the registry from every country, so the OE team could better understand how these different factors play out in each country from the perspective of data users. The sessions also explored how registries can and are having an enabling role.[125]

Ultimately, OE's decisions about which countries to prioritise for the mining licensing work were not based entirely on the peer exchange event, but it was a key opportunity to gather insights from the countries which participated, which were factored into the decision-making process.[126]

4. **Finally, the OE programme has successfully tied in with broader trends and emerging priorities in the international transparency and accountability movement.**

An important example of this is the work done by the OE programme around BO information and integrity in the energy transition, particularly in the governance of critical minerals. The OE programme's work to develop policy briefings and research linking BO to transparency in energy supply chains gained traction internationally. OE programme representatives engaged in OECD forums on this work, and officials in the US government referenced some of the insights made in this research. As an interviewee shared, "these contributions helped bring BO considerations into national policy discussions on critical minerals and energy transition governance."[127]

[123]Ibid.
[124]Ibid.
[125]Ibid.
[126]Information shared by OE in comments on the first report draft.
[127]Interview OE2.

Lessons

1. OE's **peer exchanges and work to link governments with multilateral institutions have been some of the activities partners have found most useful**, because they have helped stakeholders both learn practical lessons they can apply in their own work on BOT, and see that BOT implementation is possible in similar contexts.

   In the exit grant period, **OE should seek to link their partners up to continue these relationships after the programme ends**, such as by sharing contact information (where partners consent) and providing partners links to multilateral organisations working on BOT who have participated in events.

Efficiency

Research questions

- Did the Opening Extractives programme deliver on the objectives in an economic and timely way?
- Which programme interventions were more efficient?

Findings

1. **Some data use projects and "one-off" trainings were less efficient than anticipated.**

As explored earlier in the Effectiveness and Impact chapter, building data use capacity and tools (Activity areas 3 and 4) was very time consuming. One example of this was the programme's biggest investment in this area, the Joining the Dots project in Nigeria, worth approximately 100 USD. The platform had low uptake rates, as government stakeholders perceived it as exposing them to scrutiny rather than supporting more efficient policy implementation. While OE staff noted that the infrastructure could be reused and may deliver future benefits, this work was not efficient in the shorter term. [128]

Similarly, one-off data use training events fell short of expectations: survey respondents indicated that "isolated events" did not produce lasting improvements in participants' skills or practice.[129] By contrast, interventions that combined initial training or capacity-building with follow-up support proved far more effective.[130] For example, journalist training in Ghana, which included sustained follow-up support, led to the publication of an article about Cassius Mining Ltd, demonstrating how beneficial ownership data can be used to prevent companies with criminal connections from having mining licences renewed, as described in Overarching Findings.

[128] Insight from workshop with Opening Extractive staff, August 2025.
[129] Survey respondent.
[130] Interview OE11.

The challenges faced by data use workstreams were also closely linked to the sequencing of reforms. Advancing data use beyond one-off capacity-building sessions proved difficult in contexts where beneficial ownership data is unavailable or not publicly accessible—an issue that continues to constrain progress in several programme countries.[131]

2. **External constraints sometimes prevented work from being delivered in a timely manner.**

In some countries, the programme did not achieve its objectives within the intended timeframe. However, there is no evidence to suggest that these delays were driven by weaknesses in the programme's implementation strategies. Instead, delays were more commonly the result of external factors beyond the programme's control (see Overarching challenges).

One of the most frequent causes of delay was political change. In Indonesia, for example, progress was significantly slowed by the bureaucratic nature of government reform and the difficulty of prioritising beneficial ownership among many competing policy areas. These challenges were further exacerbated by a change in government, which meant that stakeholders had to re-establish relationships and restart engagement processes. Some described this experience as "starting all over again".[132]

Elsewhere, stakeholders in Argentina indicated that the programme was unlikely to achieve further impact due to a political context that was not conducive to the reforms being promoted.[133] In Ecuador, the OE programme organised a seminar in 2024 with the MSG, CSOs and other international organisations, where stakeholders also concluded that given the political situation and the legal changes in the field, work on BOT would need to slow down and refocus.[134]

3. **The programme has acknowledged these challenges and taken effective steps to allocate its resources more economically and efficiently in the latter half of**

[131] Interview OE11.
[132] Interview OE10.
[133] Interview ARG2 and ARG3.
[134] Information provided via email by OE14.

its life cycle by de-prioritising less efficient interventions. This has been enabled by a flexible funding model.

Since at least 2022, the Opening Extractives team has recognised the risk associated with having too many activities underway simultaneously, and has taken steps to deprioritise less efficient workstreams and country operations. This concern was evident during the 2022 team retreat, where a tiered support model, with varying levels of engagement, was proposed as a potential solution.[135] The 2023 midterm evaluation reinforced this risk, noting that the programme was at risk of "spreading itself too thin". Since then, there has been a clear and deliberate effort to prioritise activities more effectively, particularly as the programme enters its two-year transition period.

This strategic shift is reflected in the Year 5 workplan, in which four countries – Argentina, Ecuador, Nigeria and Indonesia – are explicitly marked as lower priority. In addition, OE narrowed its focus for activity area 3 (capacity building for data use) and 4 (support development of tailored technical solutions/ tools for data use). Initially, OE supported CSOs and journalists to use BO data very broadly, but shifted after the midterm to supporting more specific and targeted use of data by licensing authorities.

Importantly, this has been facilitated by an agile funding model, which enables the Programme Managing Unit (PMU) to effectively pivot towards areas of most likely impact. Even at the country level, stakeholders emphasised that this agile approach was essential for responding quickly to real-world events. For example, one country manager noted that it allowed them to invite delegates they had just met to the Global Implementers Forum in Oslo at short notice. This engagement led to the drafting of a process to incorporate beneficial ownership information into the mining licensing process in Colombia.[136]

4. **As the programme took important steps to become more efficient, some stakeholders perceived a loss of momentum and felt that progress could have been communicated more effectively.**

[135] See internal document from 2022 "OE Retreat – Reflections".
[136] Insight from workshop with OE staff, August 2025.

Although tightening the scope of the programme's activities was beneficial from an efficiency perspective, some stakeholders perceived this shift as resulting in a loss of momentum in their country, and expressed concerns about the effectiveness of communication regarding ongoing progress.

This view emerged during workshops and in the survey, particularly in relation to Nigeria, where one stakeholder noted that momentum appeared to decline following a successful initial scoping workshop:

> ***"The workshop held as part of the Scoping Study helped to increase awareness and drive debate. However, it appears to have been an isolated event. There does not appear to have been any follow up to maintain momentum."***
>
> **Survey respondent**

Similarly, a representative from an Armenian civil society organisation highlighted the need for more regular communication during periods of limited direct engagement. They noted that it would have been helpful to receive more frequent updates on how the programme was working with the government to improve data quality and support greater use of public sector data.

5. **Some government stakeholders were clear that the programme has helped them achieve their own goals more quickly.**

The programme has been credited with helping governments to avoid delays and accelerate progress. In Armenia, several stakeholders observed that while the government may have been able to implement beneficial ownership reforms independently, support from the programme allowed them to proceed more quickly and with greater impact. Stakeholders emphasised that building internal capacity while managing day-to-day responsibilities would have been highly challenging for civil servants without the coordination and technical input provided by the programme.[137]

A similar perspective was shared in Mongolia, where stakeholders noted that the programme

[137] Interviews Armenia 2 and Armenia 3.

played a central role in convening a diverse set of actors efficiently.[138] It helped to create a shared understanding of reform goals across ministries and civil society organisations. Multi-stakeholder groups were repeatedly highlighted as an important tool for ensuring regular, coordinated engagement across institutions.

6. **Finally, in some contexts, there is evidence that the programme's scope in terms of what it can and cannot fund is not always well understood, and has been interpreted as blocking efficiency.**

In some contexts, the programme's emphasis on economic efficiency has been perceived as a barrier to progress. There is also evidence that the scope of the programme, particularly in terms of what it can and cannot fund, is not always clearly understood by stakeholders.

In Ghana, for example, there have been misunderstandings regarding the programme's funding remit. Government representatives expressed a desire for the programme to finance the development of a new register system, despite this being outside the programme's mandate.[139] Elsewhere, in Liberia, stakeholders were more explicit in identifying a critical need for financial support to cover basic operational resources, such as office equipment and computers, which are essential for advancing work in this area.[140]

Importantly, the programme has recognised these funding gaps and is actively working to broker additional financial support from other partners to help address them.[141]

Lessons

1. OE's work to provide data use support has been time intensive to deliver, and has not always achieved proportionate benefits. Data use projects are most likely to be effective when relevant data is available, highlighting the importance of **sequencing reforms thoughtfully** to maximise efficiency.

[138] Workshop 2 finding.
[139] Interview Ghana1.
[140] Workshop 1 finding.
[141] Interview OE1.

2. **Projects supporting journalists and CSOs to use BOT data aren't always well received by government officials**, which can influence other workstreams such as sustaining political commitment (Activity area 1). Going forward, OO and EITI should weigh up these risks in each country, and be sure to **frame data use projects in a way that does not cause the government to disengage**.

3. **Interventions should be clearly prioritised**. In future, both organisations must avoid overextending their efforts and instead focus on the contexts and activity areas that are demonstrating the greatest impact.

4. As certain areas of work are deprioritised, **OO and EITI should adopt time- and resource-efficient methods to keep stakeholders informed** of progress. This could include the use of country-level mailing lists led by country teams.

5. At the outset of any future engagement, **OO and EITI must clearly communicate the scope of what they can and cannot fund**, and ensure this is reiterated regularly as stakeholder personnel change.

   Where additional funding is needed beyond the agreed scope, both organisations should continue to **leverage their international reputations to support local stakeholders in identifying and securing further financial resources**, especially given the current challenges within the international development funding landscape.

Sustainability

Research questions

- What reforms or ongoing plans are in place to sustain the efforts initiated by the OE programme?
- How confident are stakeholders that the momentum around beneficial ownership transparency (BOT) will continue in their country after the programme ends?
- What specific measures are/were implemented to support the long-term sustainability of the OE programme's interventions beyond its duration?

Findings

1. **Clear measures have been taken by the OE programme to promote the long-term sustainability of its reforms. These efforts have been shaped largely by country-specific priorities, varying levels of political will, and institutional capacity.**

The programme's commitment to sustainability is evident in its approach to exit and grant proposal planning, which includes tailored strategies for countries where further support is needed. In Ghana, for example, efforts are focused on strengthening data verification and integrity, particularly through collaboration with petroleum and mining agencies to operationalise the extractives licensing manual.[142]

In several contexts, legal reform pursued by OE has been a key driver of sustainability. As detailed in the Effectiveness and Impact chapter, at least seven participating countries have proposed or enacted laws and regulations supporting beneficial ownership transparency (BOT) over the past five years. These reforms help to normalise transparency in the extractives sector and lay a vital legal foundation for sustained progress.

Elsewhere, long-term sustainability has been pursued through strategic partnerships, which will be required for progress to be continued following the conclusion of OE. In Argentina,

[142] Regional Progress Conversion Notes, p.18.

stakeholders identified external drivers – such as the influence of the Financial Action Task Force (FATF) – as critical to maintaining momentum, with strong confidence in their continued impact[143].

A similar view was expressed by stakeholders in Zambia, who noted that:

> ***"The momentum built by the OEP can be sustained and lead to open access to beneficial ownership in Zambia, not only for the extractives sector but also for other corporate entities. Without support, however, the progress made will be lost and unmade."***
>
> **Survey respondent**

2. **However, stakeholders across the programme had mixed views as to whether the progress made through the Opening Extractives programme will continue.**

In countries with strong existing BOT ecosystems, we heard progress will likely continue, however, in countries where external political factors are unfavorable to BOT, stakeholders were concerned that progress could slow or stop.

Despite clear efforts to promote sustainability, the survey revealed no strong consensus on whether the progress achieved thus far will continue after the programme concludes. As outlined in the sections below, interviewees shared varying viewpoints on whether they felt that the progress achieved by the programme will be sustained after it concludes.

3. **In countries with an established BOT ecosystem, such as Armenia and Ghana, the risk of losing momentum in the reforms driven by OE appears to be low.**

In Armenia, which boasts one of the most advanced BOT ecosystems under OE, stakeholders from government, civil society, and the private sector alike express strong confidence that work on BO in the sector will continue beyond the programme's conclusion, as these efforts began well before OE's involvement. One interviewee explained that changes will still happen, although more slowly.[144] Another stated that OE mainly maximised the impact of ongoing efforts: "we can continue with or without OE but we want OE to continue so we can maximise

[143] Interview OE14.
[144] Interview Armenia 1.

impact".[145] Stakeholders also reinforced the view that legal reform is a crucial avenue for achieving sustainability, underscoring that Armenia's legal framework already mandates the disclosure of beneficial ownership data, making it unlikely that this commitment will be reversed.[146]

In Ghana, interviewees consistently expressed strong confidence in the sustainability of the work. One interviewee asserted, "The sustainability of the program is guaranteed," while others highlighted that the knowledge, skills, and capacity developed through the programme would ensure continued progress even in its absence.[147] Nonetheless, there remain concerns about funding, as alluded to in the Efficiency chapter. As one interviewee commented:

> ***"[If] I have the support and the funding, I might not need the programme. The capacity is there, the knowledge is there."***
>
> **Interview Ghana 2**

Two separate interviewees also expressed hope that the programme's close collaboration with Ghana EITI (GEITI) would facilitate a smooth handover and sustain ongoing progress.[148]

4. **In Latin America in particular, external political factors seem to pose the greatest risk to sustained progress toward the programme's goals.**

In Argentina, there is a widespread perception that momentum has stalled following the change in government in 2023. Stakeholders expressed broad pessimism about the establishment of publicly disclosed information in the extractives sector, which appears unlikely in the medium term due to a lack of political will.

Consequently, there is a strong reliance on the private sector to drive forward BOT. The recent public consultation process has helped raise awareness among companies, with an increasing

[145] Interview Armenia 2.
[146] Interview Armenia 3.
[147] Interview Ghana 1.
[148] Interview Ghana 1, Ghana 3.

number of subnational extractive firms now disclosing via EITI reports.[149] Additionally, the MSG is continuing to advance regulatory reforms related to BO definitions and thresholds.[150]

However, stakeholders consistently highlighted that interest in BO beyond those engaged by the programme through the successful public consultation remains limited. One interviewee noted that, while some individuals remain committed to advancing the work, they constitute only a small, dedicated group[151]. This stands in contrast to the thriving BOT ecosystems observed in countries such as Armenia, Ghana, and Mongolia.

On the other hand, in Ecuador, civil unrest beginning in 2022 has effectively brought progress to a halt, with BOT no longer a government priority and little evidence that the programme has been able to sustain stakeholder momentum through alternative avenues, as was seen in Argentina. The programme has acknowledged these challenges and the limited prospects for sustainability, opting to deprioritise BOT efforts, wind down activities, and mainstream them into the EITI's overarching work. Where continued work under the exit grant is unlikely, we concur that integrating initiatives into existing EITI or OO activities (depending on the organisation with the most relevant engagement) represents the most viable path forward.

5. **Elsewhere, in places like Senegal and Indonesia, stakeholders were more ambivalent as to whether progress will be sustained.**

For example, with regard to Senegal, survey respondents expressed significant reservations about the progress achieved under the programme and questioned the likelihood of future advancements. In contrast, an implementer interviewed offered a more confident assessment, pointing to the strong political will and commitment demonstrated by the new president. The same interviewee indicated that, provided the existing legal challenges are addressed, the publication of BOT data in the extractives sector is a realistic prospect.[152]

In Indonesia, BOT is notably absent from the most recent workplans (see point 5 below). Survey participants expressed low confidence in the programme's sustainability, citing weak political commitment as the primary obstacle. However, workshop participants conveyed a

[149] Interview Argentina 1.
[150] Regional conversion notes, p.11.
[151] Interviews Argentina 2 and 3.
[152] Interview OE 13.

more positive outlook, referring to a recent roadmap agreed by programme stakeholders locally:

> ***"The objective of the program really aligns with Indonesia's government objectives, focused on the use of the BO data. From the program we already identified and engaged with some stakeholders and communicated with other Ministries, such as the Ministries of Law, and Economy. During the last programme workshop, we developed a roadmap on how to develop transparency in Indonesia, it was agreed by stakeholders and is ready to implement".***
>
> **Workshop participant**

6. **BOT is referenced in the vast majority of recent EITI workplans across OE countries (8 out of 10 available). Coupled with its continued inclusion in the EITI Standard, this indicates that BOT is likely to remain on the agenda for MSGs even after the programme concludes.**

This widespread integration suggests that BOT is not only a current priority but is also likely to remain a central focus for MSGs even after the programme concludes. Given that MSGs are established mechanisms that bring together different stakeholders for dialogue and decision-making, they have the potential to be an effective channel for keeping BOT on the agenda following the programme.

Table 2: BOT in EITI workplans.

Reference to BOT in EITI workplans		
Country	**Is BOT mentioned?**	**How is BOT mentioned?**
Zambia	Yes	Mentioned as one of four programmes included in the workplan :"Advancing BOT through stakeholder dialogue, engagement and capacity".
Ghana	Yes	Mentioned in the 2025 report as one of 5 main workplan objectives: "facilitate

Reference to BOT in EITI workplans		
		GEITI implementation of BO information". Also referenced as a MSG objective (p.2).
Liberia	Yes	Mentioned as an area to prioritise. Capacity building on BO amongst CSOs and journalists is included as a workstream.
Nigeria	Yes	Mentioned as both a national and international priority which has shaped the work plan but not specifically highlighted in the activities.
Argentina	Yes	Mentioned multiple times as a key area the MSG has been working on in the EITI report from 2024. Also included in the most recent workplan released in July 2025, which calls for analysis and debate on the adopted definition of beneficial owners and from the MSG to reach consensus and provide observations on it.
Ecuador	Yes - but workplan is outdated	Includes plans for defining BO, conducting legal research, and convening stakeholders across government and private sector, e.g. "Define a Roadmap to achieve BOT".
Colombia	No	Latest report available from 2020 - 2023.
Indonesia	No	Latest report available from 2024.
Philippines	Yes	BO mentioned extensively, around 20 times and included as a specific programme.
Mongolia	Yes	BO is mentioned as an objective, with activities such as setting up a government working group and organising quarterly meetings. Also mentioned in Goal 6 focused on improving the BO registration system through joint projects with EBRD, EITI and NRGI.
Senegal	Yes	Mentioned as one of the main objectives in the extractive sector governance "publication of the BO register" p.4, "*justification*" to enhance the legal framework and the extractive sector governance through a better reforms monitoring, e.g. "the National Committee must continue and finalise work on revising the decree on the register of beneficial owners" (translated from French). Also "Evaluation of the impact of the setting up of the register of beneficial owners for effective implementation" p. 16.
Armenia	Yes	The most recent report (2023) includes BOT as an objective "implementation

Reference to BOT in EITI workplans		
		of BO data verification tools and strengthening stakeholder capacity to use data" (p.4). Also mentioned in the activity section e.g. training programs and discussions on BO data verification, "ongoing monitoring of BO declarations, their completeness and accuracy of BO data in the mining sector."

7. **Opening Extractives knowledge products have the potential to help partners to continue to make progress after the programme ends. Whilst their value to the international community is becoming clearer, we found little indication that they are used consistently by programme beneficiaries at the country level.**

We heard that the programme's work to document the role of beneficial ownership in the energy transition in the 2024 policy brief, 'Lessons for an Accountable Transition', helped to draw the attention of the previous US administration in the US and the OECD at events.[153] In addition, legislative guidance developed as part of the OE programme is being used and has been of benefit to wider EITI implementing countries. The guidance has been used in Sierra Leone, and in Cote d'Ivoire it provided support for the country's legislative reviews.

However, there is still limited evidence of how knowledge products and documents produced by the programme are being used by beneficiaries in participating OE countries. When asked directly, most beneficiaries reported that they were unaware of the existence of these materials, including policy briefings and technical documents. To maximise the value and impact of these resources, more targeted efforts are needed to improve their visibility beyond existing mailing lists.

Lessons

1. As in many policy areas, **legal reform is a key driver of sustainability**. Once BOT is enshrined in secondary legislation, it becomes difficult to reverse. Going forward, OO and EITI should continue to support the MSG and other stakeholders to provide

[153] Interview OE 2.

technical support for the legal provisions for BOT in sectors where none currently exist.

2. In some contexts, **independent progress cannot be sustained without the technical support and funding of external actors** (see Efficiency). As each OE country concludes its operations, it should actively consider **which international partners could take on a continued role**. This will be especially important in lower-income countries such as Liberia.

3. In the two-year transition phase of the programme, **OE should double down on ensuring that its knowledge products are visible to stakeholders**. This might involve re-circulating them at a country-level, beyond global mailing lists, and actively engaging local stakeholders – including national EITI chapters and MSGs – to support dissemination.

4. OE stakeholders should **clearly identify the most suitable national actors to take responsibility for sustaining progress and keeping BOT on the agenda**. In some cases, this may be the local EITI chapter and MSG; in others, it could be OO, depending on each organisation's respective priorities presence in the country. Once these roles are defined, a **clear and deliberate handover** should follow, complete with a roadmap, guidance on potential pitfalls, and strategies for engaging stakeholders.

5. In order to track the sustainability of the programme's work, OE should **consider using website analytics** to see how often the knowledge products created in the programme are accessed and cited.

6. OO and EITI should also **track the institutional uptake of BOT** by continuing to measure the **alignment of countries with the EITI 2.5 Requirements and the OO principles**. For tracking alignment with Requirement 2.5, this will require EITI to capture more longitudinal data on countries' alignment, as we were only able to access data from the past two years.

7. Finally, OO and EITI should consider **checking in with local stakeholders 1-2 years after the programme concludes** to understand what learnings are still being

applied, if networks of BO stakeholders still persist, what challenges countries faced after the end of the programme, and what progress has been made. This would allow OO and EITI to better understand the extent to which the programme's work has been sustained across each country.

Conclusion

Overall, the programme has demonstrably achieved its objectives in several countries. There is strong evidence that it has enhanced data availability, strengthened capacities to collect and use BOT data, and set the legal precedent for BOT in the extractives sector in a number of contexts.

Early indications also suggest that BOT data enabled by the programme is beginning to be utilised by governments and journalists to support a more equitable distribution of resources in the extractives sector. While comprehensive evidence of direct improvements in citizens' lives has not yet been found, this is consistent with the long-term nature of BOT reform and its systemic impacts.

The scale of external challenges faced by the programme should not be underestimated. The suspension of funding from one of its primary donors, USAID, in 2025 led to the abrupt pause of several activities. In addition, the war in Ukraine and political unrest in Ecuador significantly disrupted the programme's plans. In Ukraine's case, the conflict resulted in OE being unable to operate within the country altogether.

The programme has also faced notable internal challenges. It is important to recognise the unique nature of Opening Extractives as a collaboration between Open Ownership and EITI. While this partnership offers clear advantages, allowing both organisations to benefit from each other's expertise and networks, differences in institutional priorities and processes have, at times, made coordination and joint delivery difficult in some, but not all, country contexts. Staffing changes and limited resourcing have also posed operational challenges throughout the duration of the programme.

Looking ahead, there are clear opportunities for continued collaboration, provided it remains targeted and tightly scoped. This is especially true in the mining licensing workstream and data validation, where the potential for impact is high but activities have not yet been fully realised. Beyond these areas, the Opening Extractives programme has also generated valuable lessons for both EITI and OO as individual organisations, especially regarding the importance of scoping work and not spreading activities too thinly.

Annex

Headline findings from gap analysis

1. **Overall, the programme delivered in line with each Activity Area as planned, with the exception of Activity Areas 4 (Supporting technical solutions/tools for data use), and to a lesser extent Activity Area 3 (Capacity building for data use) which were deprioritised in the later years.**

As outlined earlier in this report, staff closely involved in these activity areas noted that progress was hindered by limited data availability and quality in several countries. These challenges highlight a dependency on Activity Area 2 (Improving data availability and quality), which could have been more explicitly anticipated in the original programme design.

2. **Relating to Outcome 1 (ensuring government, industry, and civil society actors have greater access to comprehensive and reliable information on the ultimate owners of extractive industry companies), data availability has improved in some countries through the programme's efforts, but data quality remains a gap.**

Even in contexts where data availability has improved through the programme, there is still a demand for better data quality, and improved verification mechanisms. Filling this gap should be a focus for the programme's exit period and/or EITI and OO going forward.

3. **Despite the programme's reduced emphasis on Activity Area 3, stakeholders consistently highlighted capacity building as a major contribution. Importantly, beyond training on how to use data, simply building a foundational understanding of beneficial ownership emerged as a critical achievement that should not be underestimated.**

Survey responses, particularly from government stakeholders, indicated that the programme had strengthened their capacity to use BOT data. This outcome was also supported by the programme's recent efforts to integrate BO data into mining licensing processes.

As noted in the midterm evaluation and reinforced through interviews, however, one of the programme's most significant impacts has been helping stakeholders understand what beneficial ownership is, given the technical complexity of the topic. Notably, this outcome is not reflected in the original logic model.

4. **However, capacity building alone does not necessarily lead to improved management of the risks associated with hidden ownership. Addressing these risks often depends more on political will than technical capability, highlighting a weakness in the assumed logic flow of the programme.**

For example, as was noted in relation to Zambia, uncovering violations of regulation through beneficial ownership data in the extractives sector does not necessarily lead to action. The programme has limited influence over whether BO data is used to prosecute individuals or companies, a process that ultimately depends on political will and the institutional mandate of the relevant agencies.

5. **Activity Areas 5 (learning, peer exchange, and evidence) and 6 (global communications and advocacy) were also identified as key contributions of the programme, with particular success in mobilising global support for BOT through collaboration with other international organisations working in this field.**

Regarding Objective 3 (mobilise global support for BOT to mitigate corruption and mismanagement of natural resources and beyond and adapt to new governance challenges arising from the global coronavirus pandemic), the programme has successfully raised awareness of BOT among key international stakeholders such as GIZ, the World Bank, the United Nations, and the IDB, while actively partnering with organisations focused on BOT, including the Financial Action Task Force. In countries like Liberia and Argentina, these collaborators are expected to play a crucial role in sustaining progress beyond the OE phase.

OE has also been successful in linking transparency and accountability with the global shift toward more sustainable energy systems. For example, the programme's work on the role of beneficial ownership in the energy transition, documented in the 2024 policy brief Lessons for an Accountable Transition, which includes OE case studies, drew the attention of the previous US administration and the OECD.

Additionally, beneficiaries expressed strong appreciation for the programme's efforts to build an international community of OE stakeholders. Through peer exchanges and conferences, this network has fostered cross-country collaboration (see chapter on Coherence).

6. **However, as we outline in our recommendations there is a gap relating to showcasing achievements and progress at the country level and tracking how programme outputs are used, which is relevant to Outcome 3 (advancing BOT in the extractive industries and beyond in a post COVID-19 context by documenting and communicating the impact and outcomes of the programme).**

There is still limited evidence of how knowledge products and documents created by OE are being used by direct OE beneficiaries, and more could be done to track and demonstrate their impact.

Similarly, more effort is needed to keep in-country stakeholders informed about the programme's progress. During evaluation interviews and workshops, some stakeholders expressed a desire for more frequent updates, especially in locations where activities are winding down and no formal exit communications have been shared yet.

7. **Finally, there is emerging evidence that the programme is helping citizens benefit from natural resource wealth by improving the availability and use of BO data – although, of course, this broader goal will not be fully realised through OE or BOT alone.**

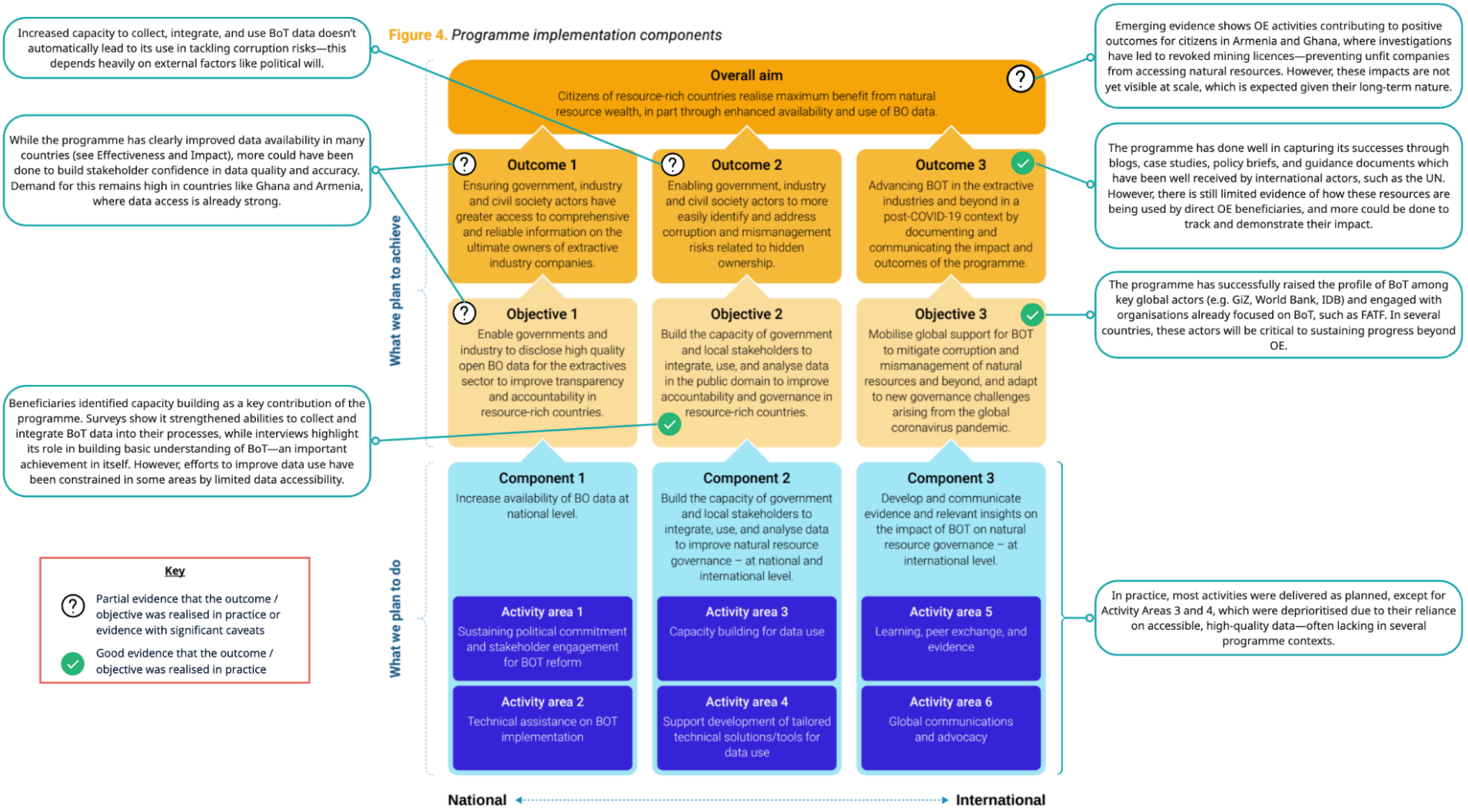
The evaluation found cases where beneficial ownership transparency data was used as part of investigations into a company in Ghana, and as part of routine due diligence checks in Armenia. This contributes, to some extent, to the programme's overarching aim of enabling citizens in resource-rich countries to maximise benefits from their natural resources. By preventing corrupt or high-risk companies from exploiting these assets – through actions such as revoking mining licenses – governments can protect public resources from mismanagement and illicit gain. This helps ensure that the revenues and economic opportunities generated by natural resources are more likely to be used for public benefit.

However, contributing to this overarching goal through BOT requires sustained systemic change. Ensuring data is available, reliable, and effectively used is a long term project

which can take decades. The tangible impacts observed so far under the OE programme are encouraging, and OO and EITI should continue to look out for future examples, particularly as it moves forward with more work on integrating BOT into mining licensing processes.

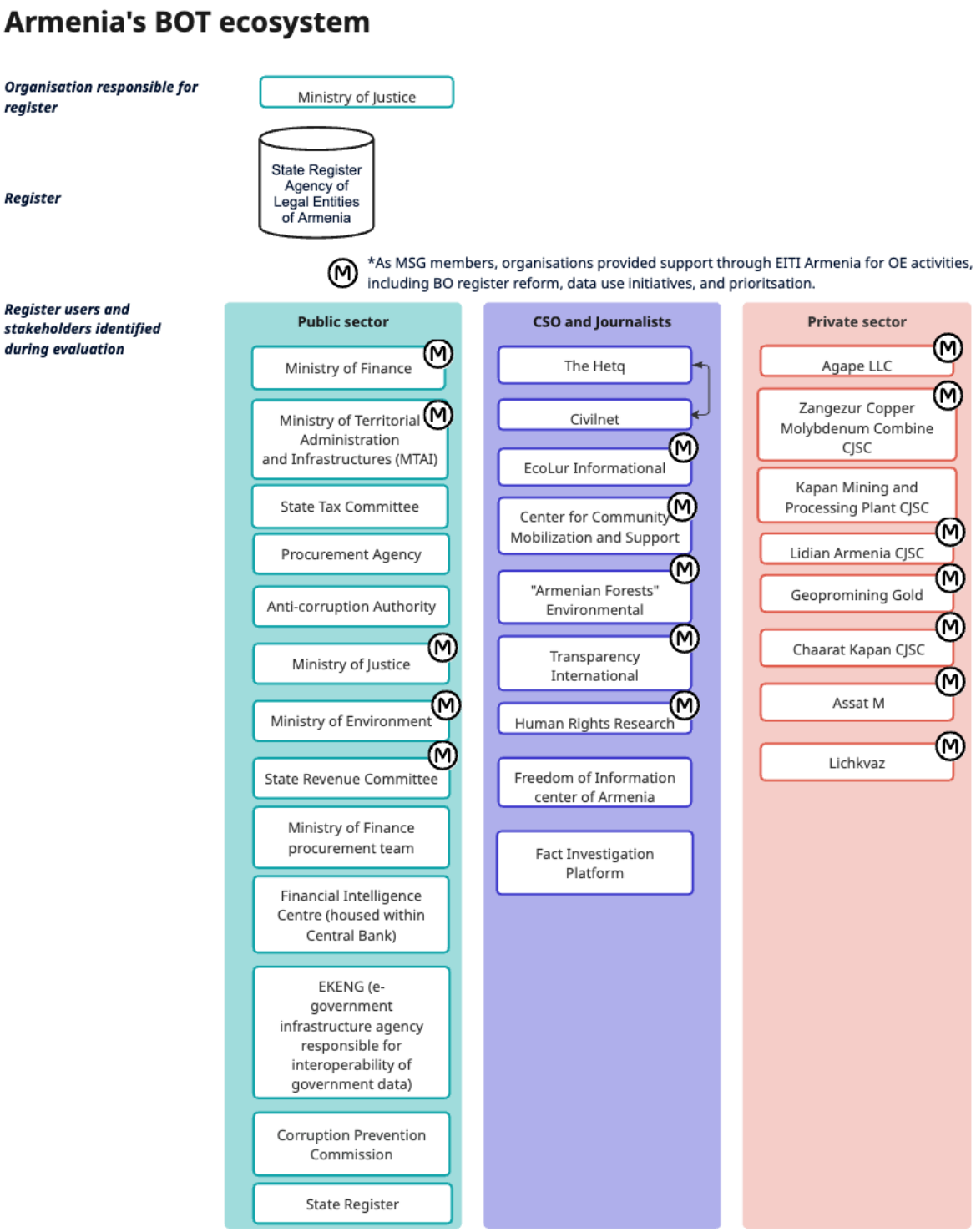
Gap analysis diagram

Below is an annotated version of the logic model from the original 2020 Programme Proposal.

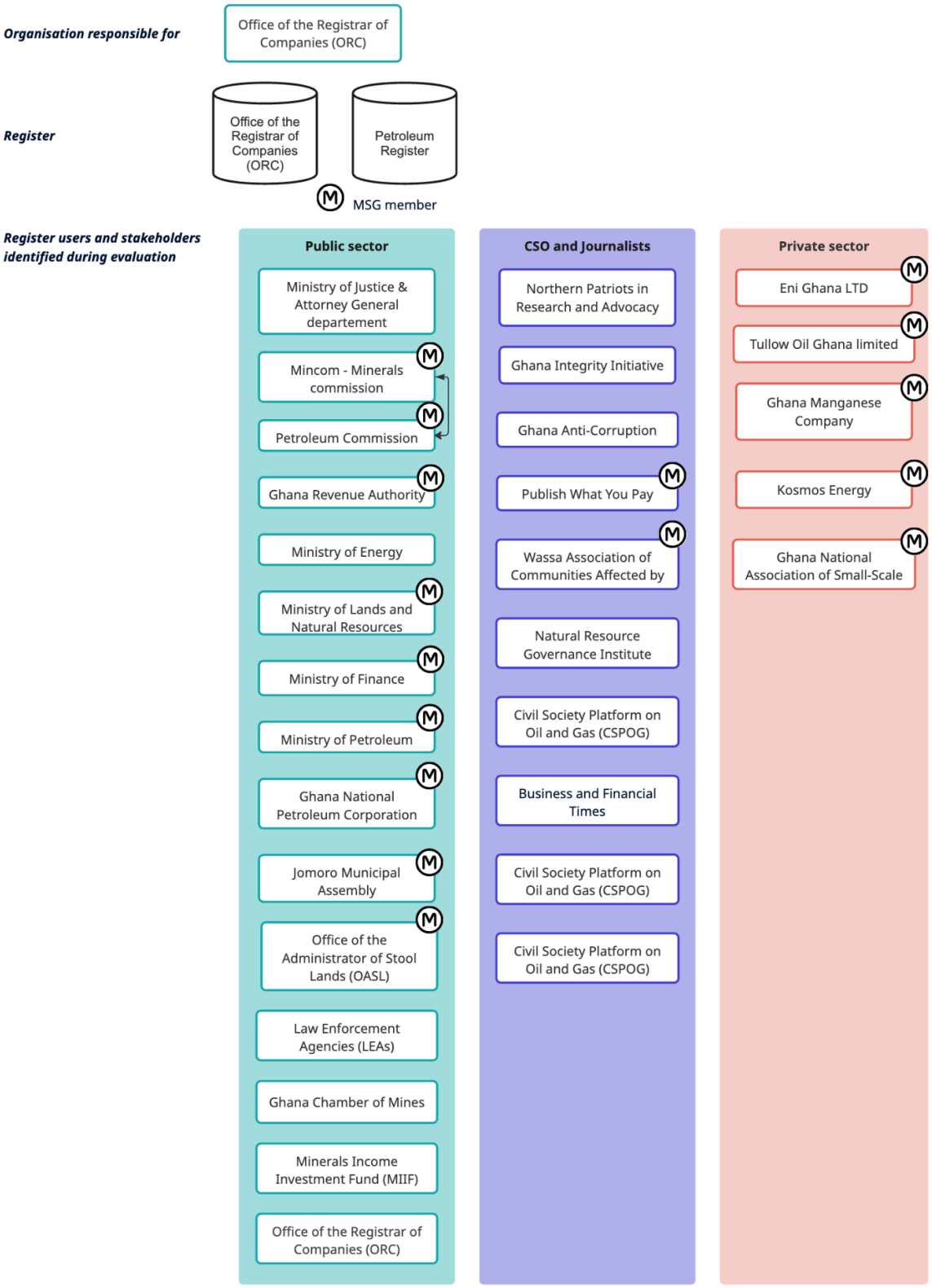


Country level stakeholder maps

Note that more detailed maps, including how organisations were engaged by OE were provided alongside this report in PDF format.



Ghana's BOT ecosystem



Argentina's BOT ecosystem

Organisation responsible for

Government of Argentina

Register

AFIP/ARCA - Agencia de Recaudacion y Control Adunero

Ⓜ MSG member

Register users and stakeholders identified during evaluation

Public sector

- Inter-american Development Bank - IDB
- Secretariat of Energy (Ministry of Economy) Ⓜ
- Anti-Corruption Office Ⓜ
- Ministry of Mining of the province of Catamarca Ⓜ
- Secretariat of Mining (Ministry of Economy) Ⓜ
- Secretariat of Mining and Energy of the province of Salta Ⓜ
- Agencia de acceso a la información pública (AAIP)
- Unidad de Información Financiera (UIF)
- The Ministry of the Environment and Sustainable Development
- GAFILAT
- ARCA - Ministry of Economy is missing (tax agency Ⓜ

CSO and Journalists

- Red Ruido
- Foundation for the Development of Sustainable Policies (Fundeps)
- FOPEA (Foro de periodismo argentino)
- Directorio Legislativo Ⓜ
- National University of San Martín (UNSAM) Ⓜ
- Catholic University of Argentina Ⓜ
- Other Voices Foundation Ⓜ
- Catholic University of Salta Ⓜ
- Asociación Civil por la Igualdad y la Justicia
- Fundacion poder ciudadano
- Initiative for Responsible Mining Assurance (IRMA)
- FUNDAR
- Centro de Investigación y Prevención de la Criminalidad Económica
- AVINA

Private sector

- Argentine Institute of Petroleum and Gas (IAPG) Ⓜ
- Argentine Chamber of Mining Entrepreneurs Ⓜ
- Chamber of Hydrocarbon Exploration and Production (CEPH) Ⓜ
- YPF S.A.* Ⓜ
- Minera Santa Cruz S.A.
- Canadian chamber of commerce
- Australian chamber of commerce
- Chevron Argentina S.R.L.
- Livent
- Pampa Energia S.A.
- Rovelli Salim & Miani
- Total Austral
- ENAP Sipetrol

**(51% owned by the government)*

Internal (Opening Extractives team members) interview guide

Questions

Please can you give a quick overview of your role, and what your responsibility is in relation to the countries / regions you manage?

What have the main achievements of the OE program been in X country/region so far? Is there any evidence to back these up? E.g. data on data use, or a BOT portal we can use to validate data availability?

Which aspects of the programme's design and implementation were most critical to achieving those standout successes?

What has worked less well or been particularly challenging? Are there things that worked well in one place but haven't worked well elsewhere?

What is next for the work underway in X country/region once the OE programme comes to a close?

Are you confident that stakeholders are empowered to / see the value in continuing to advance BOT in the extractives sector without the support of the programme?

We're looking for 3 case study countries to cover, including a wide geographical spread, and with examples of where the programme has been particularly successful, and where progress has been slower. Do you have any views on which counties would make good case studies?

We want to make sure this evaluation is as useful as possible, and doesn't just tell you what you already know. What are your priorities for the evaluation?

We're hoping to involve stakeholders in a survey, an optional workshop and for case study countries, an interview to get their views on what worked well and lessons from the programme. **Please can you share a list of stakeholders with us via email, and give a quick summary of who they are?**

External stakeholders interview guide

Questions

Introductions **Could you start by taking us through how you engage with the Opening Extractives programme? What help and support do they provide?**

Effectiveness **What were your goals for the engagement with the OE programme?**
To what extent do you think they have been met? Were they met in a timely way?

Impact **What are the biggest impacts of OE's work in [X-country] from your perspective?**
Has there been any change in data availability? If so, what did that look like?
Has there been any change in data quality? If so, what did that look like?

Has there been any change in data use? If so, what did that look like?
Have there been any changes in stakeholders' awareness of BOT and their capacity to engage with and use BO data?
Have there been any opportunities for collaboration with international partners during the programme? If so, what did that look like?
Do you think any of these changes would have occurred without the OE programme?

<u>Relevance and coherence</u> **To what extent is the work that you've been involved in through Opening Extractives well-aligned with local needs and priorities?**
How well do you think the Opening Extractives programme aligned or worked alongside other initiatives in the country that had similar goals?

<u>Obstacles and challenges</u> **Are there any challenges that you or your partners are facing that are blocking progress regarding BOT in the extractives sector?**

Has the programme helped to overcome these challenges? Is there anything else that could be done?

<u>Sustainability</u> **Do you think that the progress on BOT made over the course of the OE programme will continue after the programme finishes?**
Is there anything the OE programme could do better to ensure stakeholders in [X country] are empowered to continue to advance BOT in the extractives sector once the programme ends?

Global survey

1. **In which country or countries have you been involved in the Opening Extractives (OE) programme?**

[checklist of all OE countries plus international/global]

2. **How are you involved in the OE programme?**
    a. Checklist with the following options:
        i. Government partner
        ii. Local consultant
        iii. CSO partner
        iv. Journalist partner
        v. Private sector partner
        vi. Other (please specify)

3. **To what extent would you say the programme has improved the availability of BOT data in the extractive sector in your country or region?**

[Likert scale 1 - 5, ranging from 'not at all' to 'significantly improved']

    a. (Optional) Please explain your answer

4. **To what extent would you say the programme has improved the quality of BOT data in the extractive sector in your country or region?**

[Likert scale 1 - 5, ranging from 'not at all' to 'significantly improved']

    a. (Optional) Please explain your answer

5. **To what extent would you say the programme has helped to increase government and civil society's capacity to use beneficial ownership data in the extractive sector in your country or region?**

[Likert scale 1 - 5, ranging from 'not at all' to 'significantly improved']

    a. (Optional) Please explain your answer

6. **To what extent would you say the programme has helped to increase political commitment regarding beneficial ownership transparency in the extractives sector in your country or region?**

[Likert scale 1 - 5, ranging from 'not at all' to 'significantly improved']

a. (Optional) Please explain your answer

7. **To what extent would you say the programme has helped to drive forward international debate and knowledge sharing regarding beneficial ownership transparency in the extractives sector in your country or region?**

[Likert scale 1 - 5, ranging from 'not at all' to 'significantly improved']

a. (Optional) Please explain your answer

8. **To what extent do you think the Opening Extractives programme has achieved these goals overall in your country or region?**

[Likert scale 1 - 5, ranging from 'not at all' to 'It has completely met its goals']

a. (Optional) Please explain your answer

9. **How likely is it that the progress made through the Opening Extractives programme will continue in your country or region after the programme ends?**

[Likert scale 1 - 5, ranging from 'Very unlikely' to 'very likely']

a. (Optional) Please explain your answer

10. **To what extent have the activities of the Opening Extractives programme been relevant to your country or region's priorities?**

[Likert scale 1 - 5, ranging from 'Not aligned at all' to 'Very aligned']

a. (Optional) Please explain your answer

11. **In your opinion, what have been the main achievements of the Opening Extractives programme in your country or region?**

[open answer question]

12. **In your opinion, what challenges has the Opening Extractives programme faced in your country or region?**

[open answer question]

13. **Is there any further feedback on the Opening Extractives programme you would like to share?**

[open answer question]

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Please can you give a quick overview of your role, and what your responsibility is in relation to the countries / regions you manage?

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What is next for the work underway in X country/region once the OE programme comes to a close?

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We want to make sure this evaluation is as useful as possible, and doesn't just tell you what you already know. What are your priorities for the evaluation?

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Has there been any change in data quality? If so, what did that look like?

Has there been any change in data use? If so, what did that look like?
Have there been any changes in stakeholders' awareness of BOT and their capacity to engage with and use BO data?
Have there been any opportunities for collaboration with international partners during the programme? If so, what did that look like?
Do you think any of these changes would have occurred without the OE programme?

<u>Relevance and coherence</u> **To what extent is the work that you've been involved in through Opening Extractives well-aligned with local needs and priorities?**
How well do you think the Opening Extractives programme aligned or worked alongside other initiatives in the country that had similar goals?

<u>Obstacles and challenges</u> **Are there any challenges that you or your partners are facing that are blocking progress regarding BOT in the extractives sector?**

Has the programme helped to overcome these challenges? Is there anything else that could be done?

<u>Sustainability</u> **Do you think that the progress on BOT made over the course of the OE programme will continue after the programme finishes?**
Is there anything the OE programme could do better to ensure stakeholders in [X country] are empowered to continue to advance BOT in the extractives sector once the programme ends?

Global survey

14. **In which country or countries have you been involved in the Opening Extractives (OE) programme?**

[checklist of all OE countries plus international/global]

15. **How are you involved in the OE programme?**
    a. Checklist with the following options:
        i. Government partner
        ii. Local consultant
        iii. CSO partner
        iv. Journalist partner
        v. Private sector partner
        vi. Other (please specify)

16. **To what extent would you say the programme has improved the availability of BOT data in the extractive sector in your country or region?**

[Likert scale 1 - 5, ranging from 'not at all' to 'significantly improved']

    a. (Optional) Please explain your answer

17. **To what extent would you say the programme has improved the quality of BOT data in the extractive sector in your country or region?**

[Likert scale 1 - 5, ranging from 'not at all' to 'significantly improved']

    a. (Optional) Please explain your answer

18. **To what extent would you say the programme has helped to increase government and civil society's capacity to use beneficial ownership data in the extractive sector in your country or region?**

[Likert scale 1 - 5, ranging from 'not at all' to 'significantly improved']

    a. (Optional) Please explain your answer

19. **To what extent would you say the programme has helped to increase political commitment regarding beneficial ownership transparency in the extractives sector in your country or region?**

[Likert scale 1 - 5, ranging from 'not at all' to 'significantly improved']

a. (Optional) Please explain your answer

20. **To what extent would you say the programme has helped to drive forward international debate and knowledge sharing regarding beneficial ownership transparency in the extractives sector in your country or region?**

[Likert scale 1 - 5, ranging from 'not at all' to 'significantly improved']

a. (Optional) Please explain your answer

21. **To what extent do you think the Opening Extractives programme has achieved these goals overall in your country or region?**

[Likert scale 1 - 5, ranging from 'not at all' to 'It has completely met its goals']

a. (Optional) Please explain your answer

22. **How likely is it that the progress made through the Opening Extractives programme will continue in your country or region after the programme ends?**

[Likert scale 1 - 5, ranging from 'Very unlikely' to 'very likely']

b. (Optional) Please explain your answer

23. **To what extent have the activities of the Opening Extractives programme been relevant to your country or region's priorities?**

[Likert scale 1 - 5, ranging from 'Not aligned at all' to 'Very aligned']

a. (Optional) Please explain your answer

24. **In your opinion, what have been the main achievements of the Opening Extractives programme in your country or region?**

[open answer question]

25. **In your opinion, what challenges has the Opening Extractives programme faced in your country or region?**

[open answer question]

26. **Is there any further feedback on the Opening Extractives programme you would like to share?**

[open answer question]