



Republic of Seychelles

Ministry of Finance, Trade, Investment and Economic Planning

16th July 2020

Mrs. Helen Clark (Rt. Hon)
Chair
EITI Board

Dear Mrs. Helen Clark (Rt. Hon),

RE: REVIEW OF DRAFT VALIDATION REPORT SUBMITTED BY THE INTERNATIONAL EITI SECRETARIAT

The Seychelles EITI would like to acknowledge receipt of the Draft Validation Report, which was submitted by the International EITI Secretariat on the 10th June 2020.

The Seychelles EITI Multi-Stakeholder Group has thoroughly reviewed the document and contest the rating provided at requirement #1.5 in relation to the Workplan.

The MSG believes it should have been evaluated to meaningful progress or even satisfactory progress (pages 22 to 25) due to the fact that Seychelles:

- already has a Workplan
- has implemented most activities from the Workplan
- has had a very good representation of its constituencies (inclusive of the CSOs) who had actively promoted EITI in Seychelles and abroad (as indicated in the Workplan and in our previous reports)
- has moved to systematic disclosure, Seychelles will need to re-evaluate its reporting approach.

The Committee believes that the National SEITI Secretariat has done a lot during the years in helping the committee draft a Workplan that would be achievable and that would give the transparency that EITI needs in the country, keeping in mind that Seychelles do not have production yet.

We are therefore, confident that the validation process is an objective process based on rational analysis and that the final Validation report will be objectively consistent with the precise term of the EITI Standard and SEITI's request.

We would like to ask the EITI International Secretariat to do a thorough assessment of all the documents provided and to seriously consider revisiting the following comments.

Please find MSG’s additional response in the table below.

Yours Sincerely,

Patrick Payet
Chair
Seychelles EITI Multi-Stakeholder Group

	Category	Corrective Action	Findings from the first Validation	Progress since Validation	Secretariat’s Assessment	Page Number	MSG’s response to the assessment
1.	MSG oversight	<p>Corrective action 2: Work plan (#1.5)</p> <p>In line with EITI Requirement 1.5, the MSG should ensure it has a current EITI work plan outlining targeted objectives in line with the national priorities for the sector, and that the work plan is made widely available to the public, for example published on the national EITI website and/or other relevant</p>	<p>The first Validation found that Seychelles had made meaningful progress towards meeting this requirement. The Seychelles MSG work plan for the period 2014-2016 was to some extent linked to key national priorities that were aimed at enhancing transparency in the management of the natural resources in the</p>	<p>The 2018-2020 EITI work plan has been updated by the MSG on several occasions, including in November 2018, March 2020 and April 2020. The work plan includes activities related to EITI implementation, including the production and dissemination of EITI Reports, participation in events and</p>	<p>The International Secretariat’s preliminary assessment is that the corrective action on work plan has not been addressed and considers that Seychelles has made inadequate progress on Requirement 1.5. The 2018-2020 Workplan does not reflect the proportionate approach to EITI implementation adopted by the MSG or the transition to systematic disclosures. It does not clearly set out the Seychelles’</p>	4, 9,10	<p>It is important that EITI International Secretariat and the EITI Board assess Seychelles progress in relation to past achievements and bearing in mind that Seychelles does not have production.</p> <p>EITI should take into account that Seychelles way of reporting has changed to systematic disclosure, thus still adapting to the new approach.</p>

	<p>ministry and agency websites, in print media or in places that are easily accessible to the public.</p>	<p>petroleum industries. The 2017 work plan was however not made widely publicly available during 2017, and the objectives in this work plan did not appear to reflect national priorities for the extractive industries.</p>	<p>communications efforts. However, the work plan does not address the scope of EITI implementation or reflect the transition from traditional EITI reporting to systematic disclosures. The objectives of the work plan are not clearly linked to national priorities or the MSG's vision for EITI implementation. Follow up on recommendations from Validation or previous EITI Reports is not included. The work plan does not appear to provide a coherent tool for the MSG to oversee the comprehensiveness, timeliness or reliability</p>	<p>objectives for EITI implementation. As such, the work plan does not fulfil its function as a tool for planning and overseeing EITI implementation. The 2018-2020 work plan does not significantly differ from the 2017 work plan. The downgrade from "meaningful progress" to "inadequate progress" reflects the fact that the 2018-2020 does not communicate or correspond to the MSG's priorities under the new approach to implementation. In accordance with Requirement 1.5, Seychelles should ensure that the EITI work plan includes objectives and activities that reflect the scope of EITI implementation and systematic disclosures of data. The work plan should reflect the</p>	
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				<p>of systematic disclosures. The work plan does not include a plan for disclosing petroleum contracts from January 2021 onwards (see Requirement 2.4). Hard copies of the work plan have been made publicly available at relevant ministries.</p>	<p>MSG's role in overseeing that systematic disclosures are timely, comprehensive and reliable and outline plans for ensuring the disclosure of petroleum contracts. Follow up of recommendations from Validation should be reflected in the work plan.</p>		
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