

**Validation of Trinidad and Tobago**  
Response to MSG Feedback  
CowaterSogema Independent Validator  
15<sup>th</sup> February 2019

The Validator wishes to thank the MSG for their helpful feedback. What follows is the Validator's response to the feedback from the MSG.

**Requirement 1.4**

The Validator notes the comments from the MSG. The assessment remains unchanged.

**Requirement 2.2 Licence allocations**

In response to the feedback from the MSG, for requirement 2.2, the Validator acknowledges that the section "PSC ASSIGNMENT FOR THE PERIOD 2012-2018" in the appendixes of the 2016 EITI Report refers to licenses transferred in that fiscal year. The Validator also acknowledges section 2.3.1 of the same report includes a commentary on the non-trivial deviations from the regulatory framework governing transfer of licenses. However, it is unclear whether this is comprehensive of all non-trivial deviations in transfers in the year under review. In any case, the situation regarding licence allocations in the mining sector is problematic. The licensing allocation procedures and the cadastral information are unclear, in which case, the assessment for 2.2 remains the same.

**Requirement 2.3 Register of licences**

The Validator notes the comments from the MSG. Given the lack of a database for mining licences, the assessment remains unchanged.

**Requirement 3.2 Production data**

In response to the MSG feedback for requirement 3.2, the Validator acknowledges that no companies from the mining sector were considered material and hence, the mining sector was included only to supplement the contextual information. In the case of value of production for the mining sector, the note explained that the minerals mined are non-metallic (quarries) with no local reference prices that could be used to estimate value of production. In this case, the Validator suggests that the assessment is upgraded to satisfactory.

**Requirement 3.3 Export data**

The Validator notes the efforts to estimate export values using Central Bank and market data to add to the aggregated value data provided in the 2016 Report. The assessment remains unchanged.

**Requirement 4.1 Comprehensiveness**

In response to the MSG feedback for requirement 4.1, the validator acknowledges the information provided in form of tables to determine calculation of materiality. Considering new information coming in much later than publication of the report and not adding value to the information already provided, the assessment of "meaningful progress" is retained.

#### **Requirement 4.2 In-kind revenues**

The response from MSG is acknowledged. The information provided is limited in scope which indicates that some and not all aspects of the requirement have been implemented and the broader objectives of the requirement have not been fulfilled. Thus, the response from the MSG doesn't change the assessment of "meaningful progress".

#### **Requirement 4.4 Transport revenues**

The Validator notes the made by the MSG. However, the feedback didn't mention how materiality is defined. The feedback also states that a decision was made to include transport revenues in the next EITI report, indicating that all aspects of requirement 4.4 have not been implemented, thus the assessment of "meaningful progress" has been retained for this requirement.

#### **Requirement 4.9 Data quality**

The response of the MSG states that the Independent Administrator has to provide clarity on credible and independent audit on revenue and payments. This itself is an indication that some broader objectives have not been achieved and that the "meaningful progress" assigned to this requirement is correct and thus retained.