

## **MWEITI MSG COMMENTS ON THE DRAFT VALIDATION REPORT**

MSG members have read and reviewed the draft validation report meticulously and have appreciated the findings and recommendations of the report. They are of the view that the report is mostly accurate in its assessment and shows a good grasp of the status of EITI implementation in the country. As a result, despite the enormous volume of work undertaken, there are only few comments to put forward as can be seen below.

- i) It has been noted that the Validation Report does not give sources of information for its contextual or background data, presumably this has been taken for granted or without review from the Internal Assessment report. We wish to correct the GDP figures because they do not correspond to the Annual Economic Reports, or those of NSO and RBM that are the authority on the matter. There is no official data for ‘mining, forestry and mineral transportation’ sector (as a group) which has been stated at 10% (pg. 1), how was this arrived at? We only know about ‘mining sector’ as the other two are not disaggregated. Secondly, the 10% mentioned is in conflict with the 8.2% in the figure on top of page 2. Further, Paladin’s GDP share or contribution, when in operation, never exceeded 0.1 percent (2010-13, based on 2010 constant prices) – where is the 10% share of GDP coming from or was it a misreading of 0.1%?
- ii) The reason for downgrading license register (#2.3) score has not been appreciated. There are more than 800 licenses (600 smallscale, 204 largescale) in the mining cadaster and only to be downgraded on the basis of 4 non-compliant ones? And on the four, being downgraded for three issues that look so easy to rectify? It would be appreciated to learn more on this.
- iii) The overall numbering of sections and paragraphs in the document has not been orderly: several no.1’s or 2’s, etc. The Executive Summary may not to be numbered. It is a small issue but sometimes it can be easily escape correction in the final document.
- iv) It would appear that the CSO constituency is coming out more dominantly than other constituencies, perhaps showing that the limitations and challenges of the other constituencies – government and the private sector may not have been adequately appreciated. The environments may be different but it is believed that all constituencies have worked well individually and collectively to achieve the success of the EITI process.

The International Secretariat team did a great job and it is not for failure to read or understand that there are these few comments. The quality of work and analysis has been quite good.

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