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| Area  | ISSUE FOR SECRETARIAT | DISCUSSION | RECOMMENDATION |
| **1. Structure of the Mining Industry*** The GGDMA outlined that the majority of the mining industry in Guyana consists of small and medium-scale miners who are Guyanese-owned. These miners significantly contribute to the national economy and provide employment for thousands of Guyanese.
* Mining is a high-risk, high-cost sector with substantial economic spin-offs for other local industries.
 | No issue for action |  |  |
| **2. Concerns Over Misinformation in the GYEITI Reports*** The GGDMA raised concerns over a March 12, 2025, article in Kaieteur News titled *“Gold miners operating with expired licenses and permits – 2022 EITI Report flags.”*
* The Association objected to the classification of medium-scale miners as large-scale due to their land holdings, arguing that classification should be based on operational scale rather than land acreage.
* The GGDMA criticized the influence of MSG members with personal agendas that misrepresent the industry, leading to misinformation being propagated about the mining sector.
 | Refers to the response by the Hon Minister Classification is of concern to be addressed by the GGMC Personal agenda and Conflict of interest with respect to members of the MSG  | The statement in the press (Kaieteur news) put out by the Minister / Ministry adequately addressed the concern.To be placed on the GYEITI website and also seek to have the original statement from PSThe criteria used- acerage -deemed in- appropriate for classification The criteria for the selection of members by the Champion was discussed. Need to ensure that there is no conflict of interest. Signing of the Code of Conduct and confidentiality agreement is critical and the GYEITI to ensure same is done  | To write the GGMC on the classification of miners re: medium scale miners classified as large miners.Minister / PS to be advised on this matter. (NC meeting )Secretariat to ensure the new MSG signs the relevant agreements.- Code of Conduct of the MSG / Confidentiality Agreement. |
| **3. Lack of Context in GYEITI Reports*** The GGDMA argued that the reports failed to account for challenges faced by miners, such as:
	+ COVID-19 disruptions in 2020
	+ Flooding in 2021 and 2022
	+ Extreme dry conditions in 2023 and 2024
* The Association justified government waivers on rental fees and permissions to continue mining on unpaid lands as necessary support during difficult periods.
 | Failure to represent the challenges in the mining sector Verify the info in the report  | References are made in the contextual section of the report but there is no direct and clear statement to indicate the seriousness of the challenges.It was noted that the GGDMA represents miners on the MSG and this matter should have been frontally indicated and addressed in the review of the IA report.  | GYEITI to ensure that future EITI reports include the challenges and adequately address the serious impacts relating to productivity etc.  |
| **4. Classification of Miners and Land Holdings*** The GGDMA refuted the notion that combining multiple mining properties should reclassify medium-scale miners as large-scale.
* They highlighted that large-scale foreign mining companies often exploit investor funds without significantly contributing to the local economy.

The Association accused EITI of advocating policies that would push out small and medium-scale miners in favor of large corporations | Classification / categorizations of miners  | Refer to previous discussions and a matter to be addressed by the GGMC.Other issues raided were the unaudited financial of the GGMCGGMC very slow in providing information to the secretariat | Letter to GGMC to state the concern. The letter should include the need to bring the financial up to date.This matter will be referred to PS. |
| **5. Challenges in Compliance with EITI*** Small and medium-scale miners struggle to embrace EITI due to its perceived bias against them.
* They already pay taxes and royalties upfront, yet they face additional scrutiny under EITI.
 | Small and medium scale miners embracing EITI | SM mining enterprises not treated appropriately and needs to have a more targeted approach to address their concerns.Small scale miners do not received concessions but are expending monies locally. | To be included in the letter to GGMC.The SME are being disadvantaged vis-à-vis the large miners whose monies are expatriated after benefitting from concessions and other incentives as large-scale miners. etc |
| **6. Lack of Industry Knowledge Among MSG Members*** Many MSG members lack practical mining experience and fail to appreciate the financial and operational challenges of miners.
* The GGDMA criticized GYEITI’s broad coverage of all extractive industries, suggesting a more focused approach like Trinidad and Tobago’s emphasis on oil and gas.
 | The lack of knowledge and understanding the practices and challenges in the mining sector  | Members of the mining constituency of the MSG be given greater prominence. Secretariat staff should also be exposed to capacity building to build knowledge of the sector. | To make recommendation for a member of the MSG - Mining sector -to be considered for the position of Chairman of the MSG and also consideration for chairing or sitting in committees. To edify the MSG and secretariat  |
| **7. EITI’s Influence on Guyana’s Policies*** The GGDMA argued that EITI was imposed on Guyana through external pressure from entities like Norway.
* They suggested that EITI’s real agenda is to exert control over Guyana’s extractive sector rather than promote transparency.
 | GOG obligations and as a member of the EITI and commitments in the implementation of the EITI Standard.No action  |  |  |
| **8. Security Risks from Publishing Miners’ Information*** Publicizing detailed mining data increases security threats for miners, making them more vulnerable to criminal activities.
 | Security risk and confidentiality | What / how the information is represented in the report and the extent of the information that is already in the public domain via the land tenure maps / and on the GGMC/MNR websites. Referenced PS letter and the WB Consultant discussion on the use of unique identification for the capture of information Assess the merit of security concerns vis-à-vis data required by the IA. |  |
| **9. Environmental Concerns in GYEITI Reports*** The GGDMA noted that while EITI claims to promote environmental accountability, many first-world countries continue expanding their mining operations.

The Association highlighted that mining in Guyana has deep historical roots, dating back to the British | No action  |  |  |
| **10. Sovereignty Over Mining Lands*** The GGDMA argued that Guyanese ownership of mining lands preserves national sovereignty.
* They urged the GYEITI to focus on the positive contributions of the sector rather than portraying it negatively.
 | Noted the request  |  | GYEITI to ensure balanced reporting in EITI Report  |
| **11. International Perception of Guyana*** Misinformation in GYEITI reports can damage Guyana’s international reputation.
* The GGDMA accused some MSG members of using GYEITI for personal and political gain, rather than advocating for miners’ interests.
 | Noted  | Referenced earlier discussions on the code of conduct and confidentiality | NC to discuss with the EITI Champion  And the Code of Conduct be strictly implemented and monitored. |
| **12. Questioning Guyana’s Need for EITI*** The GGDMA questioned the relevance of Guyana’s continued participation in EITI, noting that several prominent countries are not part of the initiative.
* They argued that Guyana should develop its own policies rather than adhering to narratives set by foreign organizations.
 | Noted  |  |  |

GYEITI Secretariat, March 20, 2025.