MINUTES OF THE 1st MSG REVIEW MEETING OF THE DRAFT VALIDATION REPORT, HELD ON SEPTEMBER 18, 2026

VIRTUAL VIA ZOOM: 08:47 HRS – 10:31 HRS

Chair: MS. SONYA ROOPNAUTH, CHAIRPERSON OF THE WORKPLAN, VALIDATION AND TOR COMMITTEE

1. Call to Order and Opening Remarks. The meeting was called to order at approximately 09:02 hrs after the Secretariat confirmed attendance from at least one member of each constituency. The Chair, Ms. Sonya Roopnauth, noted that given the short notice, several members had indicated their inability to attend. The Chair proposed reviewing the first four pages of the Draft Validation Report paragraph by paragraph, followed by a walkthrough of the Validation Scores. The Consultant's suggestion was accepted for reversing the order, i.e., presenting the Scorecard overview first to set the framework for the discussions that will follow.

2. Members' Attendance. Members in attendance, virtually, are recorded in the attendance sheet attached below.

3. Announcements.

(i) Excuses were received from:

- Ms. Jennifer Persaud-Boodhoo (G)
- Mr. Poorandat (CS)
- Mr. Anand Gohil (INDUSTRY)

4. Validation Scorecard Overview.

The Consultant commended GYEITI on the score achieved. He highlighted the following:

(i) Guyana's Validation score has improved from **52 to 67**, which constitutes a passing grade under EITI standards. While 67 may not seem high intuitively, it represents significant progress and there is room to add approximately 10 more points after the GYEITI review.

(ii) Areas where scores have improved include government engagement, which is now rated strong. However, civil society engagement has weakened since the last Validation, impacting governance codes 1.3 and 1.4.

(iii) The EITI (Oslo) has engaged a former EITI Board member to assist with completing consultations on the filling of the remaining civil society seats on the MSG. Consultations with civil society groups and Dr. Ivor English (Convener) are underway, with the **call for nominations expected to go out within one week** and the process completed within **three weeks** — before the Validation Feedback submission.

(iv) Two areas received **poor scores: Requirement 2.6** (state-owned enterprises) and **Requirement 4.5** (project-level reporting). The Consultant identified these as "low-hanging fruit" where quick improvements are possible before the Validation feedback deadline.

(v) Any corrections made for Validation credit (in the review period) must be published as public documents (addendum or complementary report) on the EITI website.

(vi) NICIL Designation as Holding Company is considered a low-hanging fruit that will provide the opportunity to improve the poor scores on Requirements 2.6 and 4.5. The Consultant further advised that:

(a) Once the MSG takes a formal decision to designate NICIL as a holding company, the related scores could improve almost immediately. The Independent Administrator (IA) should be encouraged to recommend this designation as the basis for the MSG decision.

In this regard, it was recommended that the Secretariat and the Consultant prepare a **one- to two-page briefing document on NICIL**, including background, the issue, and the proposed action, for decision by the full MSG.

(b) Given that NICIL is an entity under the Government of Guyana, the Chair emphasized that any published document must be brought to the attention of the EITI Champion and the Minister of Finance for review, and that the language must be carefully vetted to avoid confusion when cited by external entities.

(c) The Consultant re-emphasized that the designation of NICIL as a holding company will be **solely for EITI disclosure purposes** and does not affect NICIL's legal or operational status.

5. Paragraph-by-Paragraph Review of Draft Validation Report (Pages 1–4).

The group proceeded with a detailed review of the Draft Validation Report. Key observations and agreed changes are set out below:

(a) Executive Summary (Paragraph 1). No comments from members. Accepted as drafted.

(b) Country Context (Paragraph 2).

(i) The Chair noted that the reference to "around 2020" for the start of oil production is inaccurate. Guyana's first oil production was in **December 2019**. Agreed to correct this date. The correct date was confirmed by the industry representative

(ii) The Chair indicated that all numbers relating to GDP and exports would be **cross-checked with the most recent data and feedback provided to the Secretariat by the Bureau of Statistics.**

(c) EITI Platform and Public Debate (Paragraph 4).

The last sentence “particularly as public spaces for such debate become increasingly reduced" — raised concern. The Chair asked whether this referred to Guyana specifically or was a global observation. It was confirmed that the reference referred to a **general global trend**. It was agreed to amend the language to make this explicit (e.g., adding "as a global trend" after "reduced") and to ensure it is supported by verifiable evidence.

(d) National Development Strategy (Paragraph 5).

The Chair raised concern that the paragraph references the old National Development Strategy (NDS) with a 2017 citation, whereas Guyana's recognized strategy is the **Low-Carbon Development Strategy (LCDS)**. Agreed to:

— Verify the source of the 2017 NDS reference.

— Replace NDS references with LCDS throughout the report where appropriate.

— Ensure consistency with Paragraph 7, which also references the national development strategy.

(e) MSG Characterization (Paragraph 6).

The last sentence “partially renewed in 2025" — was strongly criticized. The Chair stated that one sentence cannot characterize the full life of the MSG over the period May 2022 to May 2026. It acknowledged that the late renewal after eight months was problematic but cautioned against fighting the Oslo Secretariat's country context too aggressively, as the dark backdrop actually highlights the strong progress made. Agreed that the Secretariat and the consultant will draft a **more expanded sentence** that fairly captures the MSG's work over the full review period, not just the 2025 issue.

(f) Key Findings — (Paragraph 7).

The Chair reiterated that NDS references in this paragraph must be consistent with the LCDS correction.

(g) Improved Disclosures (Paragraph 8).

(i) The reference to NDS appears again — same correction applies.

(ii) The Chair questioned the reference to "sustainable public spending" as an area where EITI can enhance public monitoring. The Consultant clarified that EITI's role is limited to **information disclosure** on public spending, not influencing spending policy. Agreed to refine the language accordingly.

(h) Revenue Spending Language (Paragraph 9).

The Chair expressed concern that the language implies earmarking of extractive revenues, which Guyana has consistently stated it does not practice. It was agreed to proposed replacing references to "how extractive revenues are spent" with language about **monitoring of spending on development priorities**, recognizing the Government of Guyana's need for **flexibility** to address the dynamics of the global and domestic environment. Agreed to amend accordingly.

(i) Civil Society and Vacancies (Paragraph 10).

(i) Mr. Vogt proposed that the word "vacancies" be qualified as **"unintended vacancies"** to make clear they were not voluntary or deliberate. The Chair asked that the number of vacant seats be quantified (currently **three seats**). The Consultant clarified that the compromise from the convener's meeting is that two primary and two alternate seats will be filled.

(ii) The Chair noted that while industry participation is described as sustained by "regular and high-level participation," **no equivalent language exists for government participation** in the MSG. Agreed to add a comma after "national coordination" and insert language reflecting **"regular and high-level participation"** for government, mirroring the industry description. The Consultant confirmed that having senior-level representation at the MSG is favorable for EITI assessment.

(iii) The statement that civil society issues "have negatively affected civil society participation" was objected to by both the Chair and the industry representative. They noted that the current MSG Chair is from civil society (National Toshaos Council), which represents a positive development. It was clarified that the issue is the **structure** of civil society representation, not that civil society lacks a voice. Agreed to revise the language.

(iv) The phrase "implies the continuation of proper EITI implementation" was strongly objected to as suggesting current implementation is improper. The Chair stated her objection on the record.

(v) The reference to "reinforce the MSG's status as a credible platform" was questioned as implying the MSG is currently not credible. The group agreed to query this with the EITI Secretariat (Oslo).

(j) Artisanal and Small-Scale Mining (Paragraph 11).

The statement that coverage of artisanal and small-scale mining "remained limited" was confirmed as an accurate statement by the Consultant. He explained that Guyana is the only country that lumps small and medium-scale mining together. If the MSG can define and separate the two — emphasizing medium and large scale for reporting — it would address half the problem. This should be addressed through the IA's scoping report.

(k) Regulatory Framework (Paragraph 12). No comments raised. Accepted as drafted.

(l) Licensing, Data Integration, and Project-Level Reporting (Paragraph 13).

(i) The Consultant explained that the GGMC cadastral system contains licensing information but is not downloadable and does not integrate beneficial ownership, deal data, and other information. The recommendation is to develop a **one-stop shop** where licensing, beneficial ownership, and deal data are integrated — similar to systems in other implementing countries.

(ii) On the call for more systematic disaggregation of production and export data, the Consultant clarified this pertains to the **mining sector**, where data is not broken down by company or region due to privacy concerns and incomplete reporting.

(iii) Regarding GDP contribution, the Secretariat (GY) clarified that breakouts by sector are available in existing reports but the **accumulation across the entire extractive sector** (oil, mining, forestry, fisheries) compared to total GDP is missing. The Chair instructed the Secretariat to **write to the Bureau of Statistics (BOS)** to request this table rather than attempting manual calculations.

(iv) On project-level reporting, the Consultant explained that the MSG must first **define what constitutes a "project"** for EITI reporting (e.g., per license, per company, or per production sharing agreement). Mr. Vogt proposed placing this decision on the agenda for the MSG October Meeting at which the Secretariat would provide a technical note. The Consultant agreed this would also feed into the IA's scoping report.

(v) The Secretariat indicated that a draft paper on project-level reporting has been prepared and shared with the Consultant for his inputs. The Consultant committed to providing feedback immediately after the meeting. The Chair requested that the paper be **circulated to all MSG members on Monday, September 21**, flagged for discussion at the October MSG meeting, with a round-robin feedback process in advance.

6. Pause and Next Session.

The Chair indicated a hard stop at 10:30 hrs. The review was paused at Paragraph 13. The Chair proposed that the next session (Monday) would cover:

— Key Recommendations (Pages 6–7 of the Draft Validation Report)

— Pages 9–10, informed by the Validation Scorecard briefing received today

The meeting adjourned at approximately 10:31 hrs.

Key Decisions / Actions

No.	Area	Decision / Action	By Whom
1	NICIL Designation	Prepare a 1–2-page briefing document on NICIL designation as a holding company (background, issue, proposed action) for full MSG decision and thereafter submit it for the attention of the EITI Champion and Minister of Finance.	Secretariat / Sam Tokpah
2	NICIL — Public Document	Ensure any NICIL decision is published as a public document (addendum or complementary report) on the EITI website.	Secretariat
3	Date of First Oil Production	Correct the date from "around 2020" to **December 2019** in the Draft Validation Report.	Secretariat

4	GDP & Export Data	Cross-check all GDP and export figures in the report with the most recent data.	Chair (Sonya Roopnauth) / Secretariat
5	Global Trend — Public Debate	Amend Para 4 to clarify that the reduction of public debate spaces is a **global trend**, not specific to Guyana.	Secretariat
6	National Development Strategy	Replace all NDS references with **LCDS** (Low-Carbon Development Strategy); verify the 2017 source citation.	Secretariat
7	MSG Characterization (Para 6)	Draft an expanded sentence capturing the full MSG experience from May 2022 to May 2026, not limited to the 2025 partial renewal.	Secretariat / Sam Tokpah
8	Revenue Spending Language (Para 9)	Amend language to reflect "monitoring of spending on development priorities" and recognize government's need for flexibility; remove implication of earmarking.	Secretariat
9	Vacancies (Para 10)	Qualify vacancies as **"unintended"** and quantify the number of vacant seats (3 in total).	Secretariat
10	Government Participation (Para 10)	Add "regular and high-level participation" for government in the MSG, mirroring the language used for industry.	Secretariat
11	Civil Society Language (Para 10)	Revise language to reflect change in civil society **structure**, not negative participation; acknowledge the Toshao's role as MSG Chair. Remove implication of improper implementation.	Secretariat
12	MSG Credibility Statement	Query the "reinforce the MSG's status as a credible platform" language with the EITI Secretariat (Oslo) after the beneficial ownership review.	Secretariat
13	Civil Society Protocol	Flag the Civil Society Protocol for a deep-dive discussion at a future meeting, after beneficial ownership review is complete.	Secretariat
14	Mining Scale Definitions	Ensure the IA scoping report separates small-scale from medium-scale mining for EITI reporting to improve coverage scores.	Secretariat / IA
15	GGMC Cadastral Integration	Work with GGMC to integrate licensing, beneficial ownership, and deal data into a one-stop-shop cadastral system.	Secretariat / GGMC

16	GDP Contribution Table	Write to the Bureau of Statistics (BOS) to request a table showing total GDP contribution from the entire extractive sector (oil, mining, forestry, fisheries).	Secretariat / Chair
17	Production & Export Disaggregation	Follow up on disaggregating production and export data by company/region for the mining sector.	Secretariat
18	Project-Level Reporting — Feedback	Consultant and Secretariat to finalize the draft paper on project-level reporting immediately after the meeting.	Sam Tokpah
19	Project-Level Reporting — Circulation	Circulate the draft paper to all MSG members on **Monday, September 21**, with a note that it will be on the agenda for the **October MSG meeting**. Collect round-robin feedback ahead of the meeting.	Secretariat
20	Project-Level Reporting — MSG Decision	Place the project definition decision on the **October MSG meeting agenda**, with supporting technical notes, to be included in the Validation response before the **October 16 deadline**.	Secretariat / MSG
21	Report Writing Quality	Work with the IA to improve the clarity and writing of the report, especially regarding licensing and governance codes.	Secretariat / IA

Prepared by: Ashantie Williams

GYEITI Secretariat

ATTENDANCE

Name	Organization / Role	Constituency	Gender	Present	Excused	Absent
Sonya Roopnauth	Ministry of Finance — Chair	Government	F	✓		
Joachim Vogt	ECO Atlantic — Member	Industry	M	✓		
Rafeek Khan	Guyana Manufacturers & Services Assoc. — Member	Industry	M	✓		
Balraj Budwah	Individual — Alternate	Civil Society	M	✓		
GYEITI Secretariat & Consultants						
Renrick Ramgobin	GYEITI Secretariat — Observer	Observer	M	✓		
Rajdai Jagarnauth	GYEITI Secretariat — Observer	Observer	F	✓		
Johann Earle	GYEITI Secretariat — Observer	Observer	M	✓		
Ashantie Williams	GYEITI Secretariat — Observer	Observer	F	✓		
Sam Tokpah	Consultant — Observer	Observer	M	✓		
Apologies / Unable to Attend						
Jennifer Persaud-Boodhoo	Prime Minister's Office — Member	Government	F		✓	
Anand Gohil	CNOOC	Industry	M		✓	
Poorandat Narine	GAWU	Civil Society	M		✓	

September 18, 2026

MINUTES OF THE 2nd MSG REVIEW MEETING OF THE DRAFT VALIDATION REPORT, HELD ON SEPTEMBER 21, 2026

VIRTUAL VIA ZOOM: 08:51 HRS – 10:27 HRS

Chair: MS. SONYA ROOPNAUTH, CHAIRPERSON OF THE WORKPLAN, VALIDATION AND TOR COMMITTEE

1. Call to Order and Opening Remarks

The meeting was called to order at approximately 08:51 hrs. The Chair, Ms. Sonya Roopnauth, confirmed that at least one member from each constituency was in attendance. The session focused on a paragraph-by-paragraph review of Section 3.3 (State Participation) of the Draft Validation Report, building on the framework established at the 1st MSG Review Meeting. The committee agreed to prioritize requirements scored as **poor**, followed by **limited**, to identify and act on the most impactful corrective measures within the 30-day response window.

2. Members' Attendance

Members in attendance, virtually, are recorded in the attendance sheet attached below.

3. Announcements

Members were reminded that the same Zoom link will be used for all scheduled review meetings throughout the week.

4. Review Process and Feedback Strategy

Before proceeding with the substantive review, the committee aligned on the following approach:

1. **Scope of Review:** The Consultant recommended bypassing the Key Recommendations section and proceeding directly to the Key Findings beginning at page 10, where scores and assessments are grounded. This was agreed by the Chair.
2. **Purpose of Validation Templates:** It was confirmed that the Validation Templates circulated by Ms Jagarnauth were provided for reference purposes only and had not been altered. The committee's role is not to re-edit the validation report, but to identify factual oversights and provide counterarguments supported by evidence.
3. **Order of Review:** The committee agreed to begin with requirements scored **poor**, then progress to **limited**, then **good**. This ensures immediate focus on areas with the greatest potential for score improvement.
4. **Form of Feedback:** Feedback will take two forms: (i) a summary paper citing specific requirements and evidence-based counterarguments, and (ii) annotated templates with highlighted changes for reconsideration by the International Secretariat. The Validation Report itself may also be annotated with comments and supporting evidence where applicable. This consolidated feedback will be presented to three ministers: MNR, Parliamentary Affairs and Governance, and Finance.

5. Substantive Review — Section 3.3: State Participation (Pages 32–35)

5.1 NICIL Classification — Holding Company vs. State-Owned Enterprise (Requirements 2.6 and 4.5)

The committee identified the classification of NICIL as the central and most consequential issue in Section 3.3. Key observations and agreed positions are set out below:

1. **Current Scoring Impact:** Because NICIL is currently treated as a State-Owned Enterprise (SOE) under EITI, the reporting requirements are considerably more stringent. NICIL's disclosures have been assessed as limited, inconsistent, and largely unverifiable, resulting in a **poor** score. The Consultant assessed that reclassifying NICIL as a **holding company** for EITI disclosure purposes could increase the current score from **25% to 50–60%**.
2. **Basis for Reclassification:** NICIL functions as an entity that manages the Government's interest in mining companies — it is not an operating SOE. This is analogous to the treatment of **ZCCM-IH in Zambia**, which was similarly reclassified from SOE to holding company after facing comparable challenges, resulting in less stringent EITI reporting requirements.
3. **MSG Decision Required:** The committee agreed that the MSG must take a formal decision to treat NICIL as a holding company for EITI disclosure purposes. This decision should be supported by a concise briefing note prepared by the Secretariat and Consultant and must be ready prior to the **October 7–9 MSG Meeting**.
4. **Format of Decision Note (proposed by Joachim Vogt):** One page maximum, structured in three paragraphs: (i) Context/Background; (ii) Issue and Requirement; (iii) Recommended MSG Decision — in clear, plain text, circulated in advance of the MSG meeting.
5. **Legal Consistency:** The Chair flagged the importance of ensuring legal consistency in any published document, noting that NICIL carries its own public sensitivities. Any reclassification must be carefully vetted to ensure it does not create a new or misleading characterization of NICIL's legal or operational status.
6. **Reference to NICIL Legislation:** The Chair requested that the relevant NICIL legislation be referenced in the briefing note to anchor the recommendation in legal authority.

5.2 SOE Definition — Absence of MSG-Documented Framework

The Validation Report notes that the MSG has not defined what constitutes a State-Owned Enterprise in the national context. The committee made the following observations:

1. A clear, legally grounded definition of SOE is necessary to resolve multiple scoring issues, including Requirements 2.6 and 4.5.
2. The Auditor General's Office (AOG) is the appropriate authority from which to obtain the legal definition used for audit purposes. The Chair requested that the Secretariat arrange a meeting with the Auditor General **later today** to obtain this definition, so that GYEITI can align its framework accordingly.
3. This SOE definition exercise will also inform the treatment of NICIL-associated companies and the Guyana Gold Board (GGB).

5.3 Guyana Gold Board (GGB) — Corporate Body vs. SOE

The Validation Report notes that the GGB is not treated as an SOE in the 2023 report, despite having been classified as one in previous reporting cycles, and states that the MSG has not documented the basis for this change. The committee agreed on the following:

1. The Consultant recalled that the MSG previously deliberated on this matter and decided to treat GGB as a **corporate body** rather than an SOE, given its regulatory and trading functions.
2. The Secretariat is to check existing documentation to verify whether this MSG decision was formally recorded. If documentation exists, it should be communicated to the International Secretariat to address the findings.
3. If no documentation exists, the MSG should take a fresh decision to this effect, which can be published before the submission of feedback on the Draft Validation Report.
4. The Secretariat was requested to prepare decision support notes for the October MSG meeting covering (i) the definition of a "project," (ii) NICIL's status as a holding company, and (iii) GGB's classification — as well as any other matters arising from the ongoing review.

5.4 NICIL Financial Statements — Public Availability (Requirements 2.6 and 6.2)

The Validation Report observes that no NICIL financial statements are available in the public domain. The committee noted the following:

1. It was informally communicated to the Independent Administrator (IA) that NICIL does have audited financial statements, but these have not yet been approved by Parliament and therefore cannot be published.
2. If parliamentary approval has since been granted and the statements are now posted on NICIL's website, this should be referenced in GYEITI's feedback to the Validation Report.
3. The Secretariat is to verify the status of NICIL's audited financial statements and their public availability directly with NICIL.
4. Furthermore, the companies in which NICIL holds equity interests (including Bosai and others) are not all submitting reporting templates to the IA, and where templates have been submitted, they may not have been externally audited — compounding the verification gap.

5.5 Requirements 4.3 and 4.4 — Barter and Infrastructure Revenue Arrangements

The Consultant clarified that Requirements 4.3 and 4.4 concern extractive revenues generated through barter or infrastructure arrangements with SOEs (e.g., companies paying for use of a state-owned rail system). These requirements were assessed as **not applicable** as no such arrangements were identified in Guyana's context. The committee noted this but took no further action on these requirements, as they are neither improving nor harming the overall score.

5.6 Requirement 6.2 — Quasi-Fiscal Expenditure (GGMC)

A discrepancy was highlighted with respect to : Requirement 6.2 . It was assessed as **not applicable** in the narrative yet is scored as **limited** in the performance table. The Validation Report further flags GGMC's use of retained mining revenues for local infrastructure as warranting further examination. The committee agreed this inconsistency needs to be formally clarified and queried with the is this correct -is it the IA or the validation Team?

5.7 Requirement 4.2 — State In-Kind Oil Revenue Disclosures (Buyer Identity and Selection Criteria)

Requirement 4.2 was assessed as **good**, with the primary gap being the absence of published sales agreements, buyer identities, destination countries, and detailed buyer selection criteria for the government's profit oil from the Stabroek Block. Key observations were as follows:

1. The Ministry of Natural Resources (MNR) manages the marketing and offtake of the government's profit oil under the Petroleum Activities Act 2023. While each lifting is reported in detail, disclosures do not disaggregate by buyer or country of destination.
2. The question was asked whether commercial oil sale agreements — being trading contracts — can legally be made public. The committee acknowledged this is a nuanced issue requiring engagement with MNR.
3. The Consultant noted that what EITI requires is not necessarily the full contract, but rather the **criteria used to select buyers** — a policy-level disclosure that is distinct from proprietary commercial terms. Currently, only a generic reference to "market conditions and the most lucrative bid" has been published.
4. The committee agreed to: (i) follow up with MNR's Permanent Secretary (PS) on whether buyer criteria can be published; (ii) check the Petroleum Directorate's website for any existing published criteria; and (iii) prepare a comparative matrix of best practices from other EITI-implementing countries on buyer disclosure.
5. The Chair noted this is a **medium-term** action but should be initiated promptly given budget preparation timelines and the potential for the criteria document to be published quickly if MNR already has it.

5.8 Stakeholder Revenue Retention — GGMC

The Validation Report referenced agencies that retain revenues outside the Consolidated Fund and spend at their own discretion. The committee identified GGMC as the most likely entity in scope, given the earlier reference to its use of retained mining royalties and fees for local infrastructure disbursed at the board's discretion. The committee noted this requires further clarification and will be followed up with the relevant parties.

5.9 Corrective Actions and Strategic Recommendations — Section 3.3 Summary

The committee reviewed the corrective actions and strategic recommendations set out in the Validation Report for Section 3.3. Key items noted include:

- The MSG should review and document its SOE definition in the national context (being addressed through the AOG meeting and the NICIL briefing note).
- Government and NICIL should disclose the terms attached to state equity interests in each company, including responsibility for covering expenses in each project phase.
- NICIL should publish its audited financial statements or balance sheet.
- NICIL is encouraged to disclose the identity and beneficial ownership of its agents.
- The MSG is encouraged to review the process by which NICIL's audit reports are made publicly available through parliamentary channels, including exploring options for providing GYEITI access to such reports relevant to extractive resource governance.

- Regarding the Auditor General's statutory reporting deadline (typically in September), the committee noted that any audit report on extractive entities would be incorporated into the AG's report. The Secretariat is to obtain the exact legislative provision from the AG during the planned meeting, to provide the correct reference for GYEITI's feedback.

6. Progress Tracking — Summary Document

The Consultant recommended creating a simple tracking document (Excel or Word format) that consolidates all **poor** and **limited** requirements, identifies the associated gaps and corrective actions, records strategic recommendations, and tracks progress made or intended — with timelines. This will allow the committee to monitor momentum daily and provide clear status updates to the MSG. The committee agreed this is a practical and necessary tool given the volume of outstanding items and the tight 30-day deadline.

7. Next Session — Section 3.4 (Pages 36–40)

The committee agreed to review Section 3.4 at the next meeting, scheduled for **tomorrow, September 22, 2026, at 9:00 AM** via the same Zoom link. Section 3.4 contains two limited scores, several good scores, and one very good score. The Secretariat will alert the relevant GRA representative to attend tomorrow's session, as their input will be essential for that section. All members were asked to pre-read pages 36–40 ahead of the 9 AM sharp start.

Key Decisions / Action Items

No.	Area	Decision / Action	By Whom
1	NICIL — Holding Company Designation	Prepare a one-page recommendation note for the MSG proposing to treat NICIL as a holding company for EITI disclosure purposes. Structure: Context, Issue, Recommended MSG Decision.	Sam Tokpah / Secretariat
2	SOE Definition — Auditor General	Arrange a meeting with the Auditor General (AOG) to obtain the legal definition of a State-Owned Enterprise used for audit purposes. Target: later today.	Secretariat / Chair
3	NICIL Engagement — Section 3.3	Send the full Section 3.3 of the Validation Report to Mr. Sharma (NICIL) and request a meeting, preferably later today. Secretariat to send and copy the Chair.	Secretariat (copy Chair)
4	Buyer Disclosure — Comparative Analysis	Prepare a comparative matrix of best practices from other EITI-implementing countries on disclosure of sales agreements, buyer identities, destination countries, and buyer selection criteria for oil sales.	Sam Tokpah / Secretariat
5	Progress Tracking Document	Prepare a summary document (Excel or Word) grouping all poor and limited requirements, gaps, corrective actions, and strategic recommendations, with progress tracking fields and timelines.	Secretariat

6	Section 3.4 — GRE Attendance	Send Section 3.4 of the Validation Report to the relevant GRA representative and alert them to attend tomorrow's meeting.	Secretariat
7	Buyer Identity & Selection Criteria — MNR	Coordinate with MNR to arrange a meeting with the Permanent Secretary (PS) to discuss the disclosure of buyer identities and selection criteria for oil sales. Also check the Petroleum Directorate's website for any existing published criteria.	Secretariat
8	GGB Classification — Documentation	Check documentation to verify whether the MSG previously recorded the basis for treating the Guyana Gold Board as a corporate body (not an SOE) and communicate the finding to the International Secretariat.	Secretariat
9	NICIL Financial Statements	Verify with NICIL the status of their audited financial statements and their availability in the public domain.	Secretariat
10	MSG Decision Support Notes — October Meeting	Prepare decision support notes for the October MSG meeting covering: (i) definition of a "project," (ii) NICIL's status as a holding company, and (iii) GGB's classification as a corporate body. Include any additional matters arising from the ongoing validation review.	Secretariat
11	AG Statutory Reporting Deadline	During the meeting with the Auditor General, obtain the exact legislative provision governing the AG's statutory reporting deadline, for reference in GYEITI's validation feedback.	Secretariat / Chair

Prepared by: Ashantie Williams

Date: 21st September 2026

Attendance

Name	Organization / Role	Constituency	Gender	Present	Excused
Sonya Roopnauth	Ministry of Finance — Chair	Government	F	✓	
Joachim Vogt	ECO Atlantic — Member	Industry	M	✓	
Rafeek Khan	Guyana Manufacturers & Services Assoc. — Member	Industry	M	✓	
Jennifer Persaud-Boodhoo	Prime Minister's Office — Member	Government	F	✓	
Derrick John	Member	—	M	✓	
Madhavi Indarjeet	Civil Society — Member	Civil Society	F	✓	
GYEITI Secretariat & Consultants					
Renrick Ramgobin	GYEITI Secretariat — Observer	Observer	M	✓	
Rajdai Jagarnauth	GYEITI Secretariat — Observer	Observer	F	✓	
Johann Earle	GYEITI Secretariat — Observer	Observer	M	✓	
Ashantie Williams	GYEITI Secretariat — Observer	Observer	F	✓	
Sam Tokpah	Consultant — Observer	Observer	M	✓	

21st September 2026

MINUTES OF THE 3rd MSG REVIEW MEETING OF THE DRAFT VALIDATION REPORT, HELD ON SEPTEMBER 23, 2026

VIRTUAL VIA ZOOM: 09:00 HRS – 10:26 HRS

Chair: MS. SONYA ROOPNAUTH, CHAIRPERSON OF THE WORKPLAN, VALIDATION AND TOR COMMITTEE

1. Call to Order and Opening Remarks

The meeting was called to order at approximately 09:00 hrs. The Chair, Ms. Sonya Roopnauth, confirmed that at least one member from each constituency was in attendance, noting a brief delay while awaiting civil society participants. The Secretariat confirmed that Ms. Madhavi Indarjeet, Mr. Derrick John, and Mr. Balraj Budwah had been contacted and confirmed their attendance. Ms. Ashantie Williams of the GYEITI Secretariat was designated to support the meeting on behalf of the Secretariat, as noted by the Secretariat lead who indicated he was managing a flu and cold.

The Chair confirmed that the pages assigned for today's session were pages 36–40 of the Draft Validation Report, covering Section 3.4. The committee was reminded of the approach established at prior meetings — to identify actions immediately upon discussion and, where possible, trigger those actions without delay, with particular focus on areas assessed as **limited**. The Chair noted that this section contains **two limited scores** and one **very good score**.

2. Members' Attendance

Members in attendance, virtually, are recorded in the attendance sheet attached below.

3. Announcements

No formal excuses were recorded. The Secretariat provided a brief update on the NICIL Secretariat working paper, noting that a draft had been prepared and was being combined with Mr. Tokpah's draft into one comprehensive document. Finalization was pending feedback from Oslo regarding the proposed reclassification of NICIL from a State-Owned Enterprise (SOE) to a holding company — a change anticipated to improve Guyana's validation score. The Consultant confirmed that the Oslo engagement was to ensure there would be no pushback when the document is formally submitted.

4. Review Process and Focus

The committee proceeded with a paragraph-by-paragraph review of Section 3.4 of the Draft Validation Report. The Chair directed the committee to focus on requirements assessed as **limited** — specifically Requirements **4.7** and **4.10** — and to note areas where corrective actions can be triggered within the remaining response window ahead of the **October 16, 2026,** deadline.

5. Substantive Review — Section 3.4 (Pages 36–40)

5.1 Requirement 4.7 — Project-Level Reporting (Assessed: Limited)The National Coordinator drew the committee's attention to the note in the Validation Report explaining the **limited** assessment: the MSG has not yet approved a project definition or documentation. This remains the key obstacle to improving the score under this requirement. The Secretariat noted that a draft paper on project-level reporting has been prepared but that additional information is needed — specifically GRA's approach to project-level reporting — before the paper can be finalized for MSG consideration.

Discussion — Oil and Gas Sector:

The GRA representative) clarified that under current law, there is no legal requirement for oil companies to report separately by block. Companies file returns based on their corporate entity and associated audited financial statements. He noted that in practice, one major contractor has incorporated three separate companies — one per block — whereas another contractor with interests in three blocks reports through a single entity with one TIN, as no statute requires per-block registration. He confirmed, however, that cost audits do appear to capture costs at the field level, with columns identifying whether costs relate to specific wells or fields (e.g., Liza, Yellowtail).

echnical clarity, distinguishing between two phases in the oil and gas sector was provided by the industry representative.:

- **Exploration phase:** The petroleum agreement itself should serve as the project definition framework. Annex C of the PSA contains detailed accounting regulations and an auditing framework — applicable to all PSAs under the new regime — and should anchor project definitions at this stage.
- **Production phase:** A field-level definition — captured in the production license granted by the Minister — is more appropriate. The production license provides a specific and adequate framework for field-level project identification.

The representative emphasized that venturing outside these existing frameworks risks creating unnecessary complexity, and that the current structure of petroleum agreements and production licenses already provides adequate frameworks for project definition. It was also clarified that auditing rights under the PSA vest in the Minister of Natural Resources, who may delegate them to GRA or to an accounting firm. It was noted that GRA has directly conducted audits on certain blocks (e.g., the Canje/Orinduik license), separate from the corporate-level audit authority GRA exercises independently.

Discussion — Global and Cross-Sector Context:

The Consultant outlined three broad approaches to project definition used across EITI-implementing countries:

- Definition based on the **contract or license** (common in mining and during exploration);
- Definition based on **each interest** in interconnected Production Sharing Agreements, even where operations are intermingled; and
- A **unified entity approach**, where one operator's interests across multiple blocks are treated as a single project, regardless of the number of agreements.

The Consultant confirmed that separate project definitions for the **oil and gas** sector and the **mining** sector are permissible and may be the most appropriate path for Guyana. The Chair noted that government reporting currently occurs at the FPSO level — not at the entity or TIN level — and that for EITI purposes, the FPSO level could constitute a project in oil and gas. She flagged that a definition at the entity/TIN level would be inconsistent with how government operationally reviews production data with MNR and companies.

Discussion — Gas-to-Shore:

The Chair raised whether a separate project definition would be needed once gas-to-shore operations commence (anticipated within approximately one year). The Consultant confirmed that the definition agreed upon for oil should suffice for gas-to-shore unless specific issues arise that warrant a second look. The GRA representative clarified that gas revenue would flow into the Natural Resource Fund (monitored by MNR), while tax revenue would be monitored by GRA through entity-level reporting.

Way Forward — Agreed Actions:

The committee agreed on the following:

- o confirm GRA's definition of a **project** used in cost audits for oil and gas, including how revenue is delineated at the field level.
- The Secretariat to write to GGMC requesting a definition of the **parameters around a project** in the mining sector.
- The Secretariat to flag to the Permanent Secretary (PS) of MNR the **opportunity to incorporate project definitions** in future Production Sharing Agreements (PSAs), informed by the Petroleum Activities Act 2023, as suggested by the industry representative .
- The Secretariat to arrange a meeting with the PS of MNR to explore convening a **single holistic meeting** with GRA, GGMC, and possibly the Ministry, to resolve project definitions and other repeatedly raised issues in a coordinated manner — as proposed by the Consultant and supported by the Chair.
- The Secretariat to **document any progress** or consideration of the project definition issue for inclusion in the MSG's response to the Validation Report, even if the holistic meeting occurs after the October 16 deadline.

(The Secretariat/Observer recommended that the agenda for the meeting with government agencies include **all** matters repeatedly raised in Validation Reports — not limited to the current validation — including the longstanding question regarding the Guyana Gold Board's tax status and the basis on which it is exempt from taxes. The Chair agreed and instructed the Secretariat accordingly. The industry representative supported this approach and noted that, given the likelihood that the holistic meeting would fall after the October 16 deadline, the MSG should nonetheless document in its response that this comprehensive process is underway, as a demonstration of proactive engagement.

The assessment under Requirement 4.7 is expected to **remain limited** unless the MSG can formally agree on a project definition before the submission deadline. The committee agreed that demonstrating work-in-progress through documented engagement with GRA, GGMC, and MNR would be the most realistic and credible response within the available timeline.

5.2 Requirement 4.1 — Data Quality in Mining Reporting (Assessed: Good, with noted weaknesses)

The Chair noted the Validation Report's observation that while Requirement 4.1 is assessed as **good**, mining reporting remains the weakest area due to low reporting coverage, recurrent non-reporting of companies, legal barriers to entity-level tax disclosure, and the presence of unaudited, unincorporated entities.

The Consultant confirmed that GGMC and the Guyana Gold Board (GGB) are actively working on streamlining data quality by incorporating **temporary unique ID numbers** to improve data consistency and reduce reporting gaps. The committee agreed this progress should be formally communicated to the Secretariat in writing — a request to be made to GGMC and/or MNR — so that it can be cited as evidence of improvement in the MSG's feedback to the Validation Report.

5.3 Requirement 4.8 — Timeliness of Reports (Assessed: Very Good)

The committee noted the **very good** assessment with satisfaction. It was acknowledged that mining data remains incomplete, which is linked to the same structural issues identified under Requirements 4.1 and 4.7. No further action was required on this requirement beyond the data quality measures already discussed.

5.4 Requirement 4.9 — Data Assurance (Assessed: Adequate, with noted imperfections)

The Validation Report flagged data inconsistencies in the 2023 EITI Report and assessed assurance procedures as adequate but imperfect. The Chair noted this was the second occasion on which data inconsistencies in the 2023 report had been raised and expressed that this is not acceptable.

The Chair proposed that the Secretariat write to the **Independent Administrator (IA)** to:

- Identify specific examples of data inconsistencies observed in the 2023 report; and
- Request that the IA implement more robust **quality control checks** during the drafting process, including the use of AI-assisted consistency checking tools to flag discrepancies before publication.
- It was clarified that the data assurance challenge is not solely a BDO issue — it also stems from the stringency of EITI's assurance requirements at the company level. Specifically:
- EITI requires senior executives to sign reporting templates, which is operationally difficult within tight timelines; and
- Templates are expected to be externally audited — a requirement that companies find practically impossible to fulfill within a two-week window, as it requires a full procurement process and review of an entire year's activity.

The Consultant confirmed that the **minimum standard accepted by EITI** is a sign-off by a senior company executive (e.g., CEO or Country Manager) in lieu of external auditor verification. He emphasized that the MSG, the EITI National Secretariat, or the relevant ministry should exert greater pressure on entities to meet at least this minimum requirement. The committee agreed that companies need clearer guidance and better advance preparation to meet assurance standards.

5.5 Requirement 4.10 — Cost Monitoring (Assessed: Limited)

The Validation Report assessed Requirement 4.10 as **limited**, noting that government policies and practices for monitoring project costs and managing revenue loss risks are not publicly disclosed. The committee discussed this requirement in detail.

The Consultant clarified that the requirement does **not** ask for actual cost data — it asks for a description of government **policies and practices** for monitoring costs. Documenting these policies and uploading them to the GYEITI website would be sufficient to address the gap and earn points under this requirement.

The Industry representative outlined the current oil and gas cost monitoring framework:

- Companies submit quarterly expenditure and receipt statements and cost recovery statements to GGMC (within 30 days of each quarter-end); this is the basis for subsequent cost audits;
- Cost audits have a **24-month delay** window, meaning PSA audits are necessarily conducted well after the EITI reporting period;
- Annex **C** of the PSA is a public document and contains the relevant accounting and auditing structure for project costs. The committee agreed to explicitly reference Annex C in GYEITI's response as evidence of publicly available cost monitoring policy.

Regarding **published cost audits**, the committee noted:

- Only **one of three** cost recovery audits is published in final form;
- A second audit appears to be published but not in final form; and
- A third audit remains unpublished.

The committee agreed that the PS of MNR and GRA should clarify the status of each audit and ensure that any ongoing audits are **clearly labeled as such** on the GYEITI website, so the public understands what is available and why certain audits are incomplete. Version labeling and link corrections were identified as low-hanging fruit.

The GRA representative confirmed that **tax audit reports cannot be disclosed** due to confidentiality requirements under the Revenue Authority Act and Section 4 of the Income Tax Act, which prohibit officers from disclosing taxpayer information. Additionally, publishing assessments while a taxpayer's right to object under Section 78 of the Income Tax Act remains active would prejudice those proceedings. The committee acknowledged the sensitivity and legal constraints involved.

The Chair raised a question — for follow-up with the Consultant and Oslo — regarding **who is responsible for analyzing published cost audits** (as referenced in the Validation Report's recommendations under Requirement 4.10). Given that audits are inherently detailed analytical documents, It was asked whether a secondary analysis by the EITI Secretariat would constitute "EITI overkill." The Chair directed the Secretariat to formally seek clarification from the Consultant (and possibly Oslo) on whether this is standard practice globally and, if so, what capacity or expertise would be required of the Secretariat to fulfill this role.

5.6 Revenue Data and Non-Reporting Companies

The committee reviewed the paragraph on revenue data for oil, gas, mining, and forestry, noting that **10 companies did not submit templates for 2023**, with **6 being recurrent non-reporters**. Template coverage reached 52% against an expected 68%. The Chair asked the Secretariat to insert a note in the working document querying whether this status has since improved, and to confirm for the MSG's response whether any improvement can be documented.

5.7 Confidentiality Clauses — Revenue Authority Act and Income Tax Act

The Validation Report notes that GRA cannot provide an entity-level view of mining tax payments because the Revenue Authority Act and Income Tax Act permit disclosure only where the taxpayer grants a waiver. The committee noted that the recommendation for the MSG to agree a roadmap for amending both Acts had recorded no progress and remained unaddressed.

The Secretariat confirmed that additional waivers have been received — a few for forestry and approximately two additional waivers for mining. The Chair asked that the status of outstanding waivers be raised with the PS of MNR as an agenda item, to determine what further outreach to companies can be done, particularly in the mining sector.

On the question of legislative amendment, the GRA representative noted that any amendments to the confidentiality provisions would require extensive deliberation, given the fundamental importance of taxpayer data protection and the risk of prejudicing taxpayer rights. Johann Earle proposed — and the committee agreed — that this matter be formally **referred to the newly constituted Legal Committee of the MSG** for review and advice on the way forward, including whether amendments are feasible, what form they might take, and what safeguards would be necessary.

5.8 Forestry Sector — Outreach and Sensitization

The view was expressed that forestry companies may constitute a significant proportion of the non-reporting entities, given that 2023 was the first year forestry was included in EITI reporting. It was also noted that many of these companies may have had no prior awareness of EITI and may have found the reporting requirements unfamiliar and daunting. The Member offered to personally conduct outreach and sensitization to forestry companies within his network.

The Chair welcomed the offer and directed the Secretariat to:

- Confirm whether forestry companies are disproportionately represented among non-reporters;
- Liaise with Rafeek Khan to coordinate targeted outreach and sensitization, empowering him with key messages and relevant information; and
- Recommend to the **Communications Committee** (chaired by Ms. Jennifer Persaud-Boodhoo) that forestry sector associations — including the Forest Products Association, the GMSA, and regional small logger associations — be incorporated as a **target group** in the EITI communications work plan.

The National Coordinator) noted that MSG constituency consultations provide a formal mechanism for this type of engagement, and that the Secretariat stands ready to support. The Chair confirmed

that any outreach conducted should be documented so it can be recorded as constituency engagement for EITI purposes.

6. Pause and Next Session

The Chair indicated a hard stop due to a subsequent commitment. The review was paused at the end of the paragraph on the audit and filing regime (within Section 3.4). The Chair proposed that the next session continue from the **mining** section of the same pages and proceed through to page 40, covering EITI Requirement 4.9 in full, before moving on to **Section 3.5 — Revenue Management and Subnational Contributions**.

The Chair requested all members to connect by **08:55 hrs.** for a prompt **09:00 hrs start** at the next session and thanked all participants for their engagement.

The meeting adjourned at approximately 10:26 hrs.

Key Decisions / Actions

No.	Area	Decision / Action	By Whom
1	Project Definition — GRA (Oil & Gas)	Confirm with GRA the definition of a project used in cost audits for oil and gas and include how revenue is delineated at the field level.	Rafael Singh / GRA
2	Project Definition — Mining (GGMC)	Write to GGMC requesting a written definition of the parameters around a project in the mining sector.	Secretariat
3	Project Definition — Future PSAs	Flag to the Permanent Secretary (PS) of MNR the opportunity to incorporate project definitions in future Production Sharing Agreements (PSAs), informed by the Petroleum Activities Act 2023.	Secretariat
4	Holistic Government Meeting — PS of MNR	Arrange a meeting with the PS of MNR to discuss convening a single, holistic meeting with GRA, GGMC, and possibly the Ministry to resolve project definitions and other repeated issues. Agenda to include all matters repeatedly raised in Validation Reports, including the Guyana Gold Board's tax status.	Secretariat
5	Project Definition — MSG Response Documentation	Document any progress or consideration of the project definition issue for inclusion in the MSG's response to the Validation Report, even if the holistic meeting occurs after the October 16 deadline.	Secretariat
6	Data Quality — GGMC / GGB Unique IDs	Request formal written confirmation from GGMC (and/or MNR) of progress made in streamlining data quality through the use of temporary unique ID numbers, for inclusion in the MSG's validation response.	Secretariat

7	Data Inconsistencies — Independent Administrator	Write to the Independent Administrator (IA) to highlight specific data inconsistencies observed in the 2023 EITI Report and request improved quality control checks, including the use of AI-assisted consistency tools during report drafting.	Secretariat
8	Cost Monitoring Policy (Req. 4.10)	Document government policies and practices for monitoring project costs (drawing on Annex C of the PSA and ministerial statements) and upload to the GYEITI website to address the gap under Requirement 4.10.	Secretariat / MNR
9	Cost Audit — Version Labeling and Links	Follow up with GRA and the PS of MNR to clarify the status of all three cost recovery audits (published final, published non-final, and unpublished) and ensure correct version labeling and links on the GYEITI website.	Secretariat
10	Cost Audit Analysis — Global Clarification	Seek clarification from the Consultant (Sam Tokpah) (and possibly Oslo) on who is responsible for analyzing published cost audits under Requirement 4.10 and what the global country experience of EITI Secretariats is in this regard.	Secretariat / Sam Tokpah
11	Tax Waivers — Status Update	Follow up with the PS of MNR to obtain an update on the status of waivers granted by companies for EITI reporting purposes and include as an agenda item in the planned PS meeting.	Secretariat
12	Confidentiality Clauses — Legal Committee Referral	Refer the matter of reviewing and/or amending the Revenue Authority Act and Income Tax Act (regarding confidentiality provisions and waivers) to the Legal Committee of the MSG for review and advice on the way forward.	Secretariat
13	Non-Reporting Companies — Status Check	Confirm whether the status of the 10 non-reporting companies (6 recurrent) identified in the 2023 report has improved, and document any progress for inclusion in the MSG's validation response.	Secretariat
14	Forestry Sector — Non-Reporting Confirmation	Identify whether forestry companies are disproportionately represented among non-reporting entities for the 2023 reporting cycle.	Secretariat
15	Forestry Outreach — Sensitization	Liaise with Rafeek Khan to facilitate targeted outreach and sensitization to forestry companies, equipping him with key EITI messages. Coordinate with the Communications Committee to incorporate forestry sector associations (Forest Products Association, GMSA, and regional small logger associations) as a target group in the communications work plan.	Secretariat / Rafeek Khan / Communications Committee

16	GRA / GGMC Holistic Meeting — Agenda Scope	Ensure the agenda for the planned holistic meeting with government agencies (GRA, GGMC, MNR) includes all repeated issues raised across Validation Reports, including the Guyana Gold Board's tax status and classification.	Secretariat

Prepared by: Ashantie Williams

Date: 23rd September 2026

ATTENDANCE

Name	Organization / Role	Constituency	Gender	Present	Excused
Sonya Roopnauth	Ministry of Finance — Chair	Government	F	✓	
Joachim Vogt	ECO Atlantic — Member	Industry	M	✓	
Rafeek Khan	Guyana Manufacturers & Services Assoc. — Member	Industry	M	✓	
Derrick John	Member	Civil Society	M	✓	
Madhavi Indarjeet	Civil Society — Member	Civil Society	F	✓	
Balraj Budwah	Individual — Alternate	Civil Society	M	✓	
Rafael Singh	Guyana Revenue Authority	Government	M	✓	
Abbigale Loncke	Sispro — Alternate Member	Industry	F	✓	
Anil Persaud	Ministry of Parliamentary Affairs & Governance — Alternate Member	Government	M	✓	
GYEITI Secretariat					
Renrick Ramgobin	GYEITI Secretariat	Observer	M	✓	
Johann Earle	GYEITI Secretariat	Observer	M	✓	
Rajdai Jagarnauth	GYEITI Secretariat	Observer	F	✓	
Ashantie Williams	GYEITI Secretariat	Observer	F	✓	
Sam Tokpah	Consultant	Observer	M	✓	

23rd September 2026

MINUTES OF THE 4th MSG REVIEW MEETING OF THE DRAFT VALIDATION REPORT, HELD ON SEPTEMBER 24, 2026

VIRTUAL VIA ZOOM: 08:48 HRS – 10:20 HRS

Chair: MR. JOACHIM VOGT (ECO ATLANTIC), ACTING IN PLACE OF MS. SONYA ROOPNAUTH, CHAIRPERSON OF THE WORKPLAN, VALIDATION AND TOR COMMITTEE

1. Call to Order and Opening Remarks

The meeting was called to order at approximately 08:48 hrs. Mr. Joachim Vogt opened the meeting in place of Ms. Sonya Roopnauth, who was unable to attend due to an unforeseen priority commitment. Mr. Vogt confirmed that once the Secretariat had established quorum, the session would proceed. The Secretariat confirmed that outreach had been conducted via WhatsApp to remind attendees, and that at least one civil society member was expected to join. Mr. Derrick John joined shortly thereafter, confirming one representative from each constituency was present.

Mr. Vogt noted that the session would continue from the point where the previous meeting had paused — specifically page 37 of the Draft Validation Report — and that the committee was not far from completing the review, though the remaining sections were technically complex, particularly those relating to the Amerindian Act and mining-related payments.

Mr. Vogt also raised, informally, the suggestion of establishing a protocol whereby meetings could proceed after a 10-minute waiting period in the absence of a quorum, to avoid unnecessary delays. He proposed this be considered by the MSG at an appropriate time.

2. Members' Attendance

Members in attendance, virtually, are recorded in the attendance sheet attached below.

3. Announcements

No formal excuses were recorded. Mr. Vogt noted that the Chair, Ms. Roopnauth, had asked him to step in and facilitate the meeting. The Secretariat confirmed that the NICIL reclassification paper remains in progress, with ongoing engagement with NICIL pending guidance from the Director of Budget.

4. Review Process — Section 3.4 (Pages 37–40, Continued)

The committee resumed its paragraph-by-paragraph review of Section 3.4 of the Draft Validation Report from page 37, continuing through to the end of page 40. The Acting Chair directed the committee to focus on areas with corrective action potential ahead of the **October 16, 2026,** deadline, and to identify issues for resolution at the upcoming MSG meeting on **October 7, 2026**.

5. Substantive Review — Section 3.4 (Pages 37–40, Continued)

5.1 Requirement 4.1 — Data Quality (Assessed: Good)

The Chair drew the committee's attention to the statement that, despite shortcomings in the mining sector, Requirement 4.1 was assessed as **good**. He found the statement — that the consideration and lack of progress on corrective actions resulted in a "good" rating — somewhat surprising in isolation.

It was noted that while mining data had shortcomings, other sectors met the key aspects of Requirement 4.1, including oil, gas, forestry, and fisheries disclosures beyond what the standard requires, with no material limit. The committee agreed that the "good" rating should not be contested and that the language was qualified by surrounding paragraphs not immediately visible in isolation.In response to concern about language in the report suggesting that the MSG has the responsibility for amending legislation — specifically the Revenue Authority Act and Income Tax Act. The committee agreed that while the MSG can make recommendations and influence government policy, it cannot directly amend legislation. The Consultant confirmed this, noting the MSG's role is to raise issues and engage the appropriate authorities to consider change. The committee agreed that the language in the report should be re-worded to reflect that the MSG's role is to make recommendations to the government, not to amend Acts directly.

5.2 Requirement 4.7 — Project Definition (Assessed: Limited)

The committee confirmed it had substantially discussed this requirement at the previous session. The Chair noted that the intention is to bring a formal decision on project definition — for both the **oil and gas** and **mining** sectors — to the MSG meeting on **October 7, 2026**. The Secretariat was tasked to prepare a **decision support sheet** for the MSG's consideration at that meeting.

The Meeting noted an important clarification arising from the GRA perspective that : the GRA cost recovery unit does not use the term "project." Cost audits are conducted in accordance with the rights and obligations defined in **Annex C** of the relevant Petroleum Agreement (e.g., Article 1.5 of Annex C of the Stabroek Petroleum Agreement). GRA reviews all costs incurred within a given period against what is allowable under Section 3 of Annex C. It was also confirmed that GRA does not monitor revenue collected from the sale of crude — this is the responsibility of MNR.

The Chair noted that Annex C of the PSA is a public document and that it provides a legitimate, detailed contractual framework for cost disaggregation. It was suggested that a note be prepared highlighting how Annex C performs the function of a project cost definition framework in the oil and gas sector, even where the term "project" is not explicitly used — and that Oslo may have an incomplete appreciation of what the PSAs provide in this regard.

The Consultant outlined two practical steps needed to fully address Requirement 4.10 (Cost Monitoring) at this stage:

- First, the MSG should establish and document a process by which GYEITI can access cost reports and mainstream them into regular MSG meetings — for example, through presentations by MNR representatives on project cost monitoring practices.
- Second, the government's policies and practices for monitoring project costs should be described and made publicly available on the GYEITI website.

The Chair proposed that future MSG agendas include a standing **in-depth policy discussion item** — a structured "deep dive" on fundamental topics, potentially including presentations from relevant government officials or agency representatives. This would improve the MSG's institutional understanding of sector issues, create traceability of discussion, and address recurring Oslo observations that key topics had not been formally considered by the MSG. The committee supported this proposal.

5.3 Requirement 4.8 — Timeliness of Reports (Assessed: Very Good)

The committee noted that while the overall assessment of timeliness is **very good**, mining data remains approximately two years outdated by the time it is reported, as there is no equivalent routine systematic disclosure mechanism for the mining sector comparable to the Natural Resource Fund framework for oil and gas. The Consultant observed that the MSG should, in a subsequent work plan, consider working more closely with GRA to systematically disclose revenue information and improve mining data timeliness. No corrective action specific to the current validation was required on this requirement.

5.4 Requirement 4.9 — Data Assurance (Assessed: Good)

The committee discussed a concerning observation in the Validation Report: the **2023 EITI Report contains four different totals for 2023 extractive revenues**. The Chair asked whether this was a data problem or a report-writing problem. The Secretariat (GY) confirmed that this had been flagged previously during preparation of the last bulletin, and that there may be an explanation related to the distinction between reconciled and unreconciled figures — but that this distinction is not clearly communicated in the report, leaving significant room for misinterpretation.

The committee agreed this must be urgently flagged with the **Independent Administrator (BDO)**. The Consultant noted that if BDO can provide a clear response addressing these inconsistencies prior to the MSG meeting, the score on this requirement could potentially improve from good to **very good** — making this a time-sensitive priority.

The Consultant also noted that the IA needs to reconcile the revenue figures between the templates and data from other state agencies (e.g., the central bank or Bureau of Statistics), which define the "extractive sector" differently from the GYEITI scope. BDO should clarify the basis on which it arrives at its figures versus how government calculates extractive sector revenue and explain any differences. The committee agreed that the Secretariat should draft a focused email to BDO listing the most salient issues for a response prior to the October 7 MSG meeting, with an additional MSG session possible closer to the October 16 deadline if needed.

On the corrective action requiring the MSG to document the rationale for adopting standardized procedures and to apply them without material deviations, the Consultant proposed that the MSG adopt a **material deviation threshold by sector** (e.g., 5% variation between company and government figures, assessed separately for oil and gas and for mining). The Secretariat was asked to prepare a short note for the October 7 MSG meeting with context, the issue, and a recommendation for a vote, drawing on global EITI country experience where available.

5.5 Public Accounts Committee — Scrutiny of Extractive Accounts

The Meeting noted the concern about a statement in the report to the effect that the Public Accounts Committee (PAC) has not scrutinized public accounts for six years. It was clarified that the PAC works **chronologically** through the Auditor General's reports — it does not skip years but progresses through a backlog in order. The PAC review process is currently at 2019. The phrasing in the report implies that the PAC has made a conscious decision to avoid scrutiny. This representation is deemed inaccurate and misleading.

The Consultant suggested identifying whether any extractive sector agency (e.g., GGMC) had been specifically scrutinized within the relevant six-year window, as this could provide a counterpoint to the report's characterization. In response to the consultant suggestion, the committee agreed to investigate, including by liaising with PS McKenzie, to determine whether any GGMC-related matters were addressed by the PAC in the period in question, and to provide a more nuanced note for inclusion in the MSG's response.

5.6 Requirement 4.10 — Cost Monitoring (Assessed: Limited)

The Validation Report assessed Requirement 4.10 as **limited**. The committee discussed the revenue loss risk dimension of this requirement. The Chair mentioned that he was not aware of publicly documented policies or regulations specifically governing revenue loss risk assessment in Guyana and suggested that decision-making in this area tends to be ministerial and case-by-case rather than protocol-driven.

Concern from the GRA perspective were raised about the wisdom of publicly disclosing internal compliance procedures — particularly in the mining sector — given the risk that such disclosure could equip non-compliant entities to circumvent monitoring systems. The Consultant clarified that the EITI requirement is not asking for sensitive operational details, but rather for a high-level description of the **processes the government** uses to monitor costs and manage revenue risks — for example, the existence of sub-regional field offices, agent-based monitoring, and quarterly reporting obligations under the PSA. He noted that such information is publicly available in most EITI-implementing countries and constitutes low-hanging fruit. The committee agreed the Secretariat should follow up with the PS of MNR for guidance on what policies or processes can be described and published.

5.7 Strategic Recommendation — Publication of Agency Audit Accounts

The committee discussed a strategic recommendation in the report to **seek publication of agency audit accounts as they are completed**, rather than upon conclusion of the parliamentary process. The Committee expressed its concern about this recommendation and expressly stated that the publication of audited financial statements prior to their being tabled in the National Assembly departs from the legally mandated institutional processes.

It was also emphasized that for most agencies, audited financial statements are published by the Auditor General as soon as they are completed. For specific agencies — such as NICIL — where a requirement to lay financial statements in the National Assembly applies, that process is a legal obligation and cannot be bypassed. The committee agreed that the Consultant's characterization was apt: the recommendation, as framed, is misaligned with domestic legislative requirements and should be addressed with a short explanatory note to Oslo.

The Consultant reiterated the relevance of NICIL's potential reclassification as a **holding company** (rather than a State-Owned Enterprise) for EITI reporting purposes. Under a holding company classification, disclosure obligations would be limited to NICIL's transactions with the entities in which it holds interests — a narrower and more manageable scope — potentially avoiding the parliamentary process issue entirely. The Secretariat confirmed that a paper on NICIL reclassification is being prepared, with engagement with NICIL ongoing, and that it is anticipated to be ready for the October 7 MSG meeting.

6. Pause and Next Session

The committee completed its review through to the end of page 40 (Section 3.4) at approximately 10:18 hrs. The Chair confirmed that **Section 3.5 — Revenue Management and Subnational Contributions** and **Section 3.6 — Environmental and Social Impacts** remain the two outstanding sections for review. He indicated a preference for the substantive Chair Ms. Roopnauth to be present to address Section 3.5 i, given the complexity of the topics involved.

Committee member Rafeek Khan raised the possibility of scheduling a session on Monday, 28 September 2026. The Chair indicated he could not exclude it but noted a potential scheduling conflict and suggested that Monday or Tuesday be considered depending on availability. It was agreed to confirm the next session date during the following day's meeting.

The Chair thanked all participants for their continued engagement and adjourned the meeting at approximately 10:20 hrs.

7. Key Decisions / Actions

No.	Area	Decision / Action	By Whom
1	Project Definition — MSG Decision Support Sheet	Prepare a decision support sheet for the MSG meeting on October 7, 2026, regarding the formal adoption of a project definition for the oil and gas and mining sectors.	Secretariat
2	Report Language — MSG Legislative Role	Note that the language in the Validation Report regarding the MSG's role in amending legislation should be re-worded in the MSG's response to reflect that the MSG can make recommendations to government but cannot directly amend Acts.	Secretariat / Consultant
3	Cost Audits — Annex C Note	Capture the discussion regarding the role of Annex C of the PSA as the legitimate cost definition and auditing framework in the oil and gas sector and include this in the report/note to Oslo to provide additional context on project cost monitoring.	Secretariat
4	Data Inconsistencies — IA/BDO Email	Draft an email to the Independent Administrator (BDO) listing the most salient data inconsistency issues for a response prior to the MSG meeting on October 7, 2026 — including the four different revenue totals in the 2023 EITI Report and the reconciliation of EITI data with state agency figures.	Secretariat
5	Data Reconciliation — IA/BDO Feedback Request	Request feedback from the IA/BDO regarding the inconsistencies in 2023 EITI report totals and the reconciliation of EITI revenue data with figures from other state agencies (e.g., central bank, Bureau of Statistics), and request that the basis for differences be clearly explained.	Secretariat

6	Material Deviation Threshold — MSG Note	Prepare a short note for the MSG on October 7, 2026, proposing a material deviation threshold (e.g., 5% by sector) for reconciled data, drawing on global EITI country experience, for MSG decision.	Secretariat
7	Additional MSG Meeting — Pre-Deadline Endorsement	Arrange for a potential additional MSG meeting prior to the October 16, 2026, deadline, if necessary, to endorse the IA's responses and finalize the MSG's submissions to Oslo.	Secretariat
8	Cost Monitoring — Revenue Loss Risk Policies (Req. 4.10)	Follow up with the Permanent Secretary (PS) of MNR for guidance on the policies and processes regarding revenue loss risks and cost monitoring, with a view to documenting and publishing these on the GYEITI website.	Secretariat
9	Public Accounts Committee — PAC Scrutiny Clarification	Investigate and provide clarification on the PAC's chronological scrutiny process and whether any extractive sector agency (e.g., GGMC) accounts were scrutinized within the relevant period. Liaise with PS McKenzie as appropriate.	Anil
10	Publication of Agency Accounts — Note to Oslo	Prepare a short explanatory note to Oslo clarifying the domestic legislative requirements governing publication of agency audited financial statements (including the National Assembly tabling process), in response to the strategic recommendation on early publication.	Secretariat
11	NICIL Reclassification — MSG Paper	Prepare a paper for the MSG's consideration on the reclassification of NICIL as a holding company for EITI reporting purposes, incorporating relevant discussion from the validation review sessions. Target completion ahead of the October 7, 2026, MSG meeting.	Secretariat
12	MSG Agenda Enhancement — Policy Deep Dives	Include in future MSG agendas a standing item for in-depth discussion of fundamental policy topics, including presentations from relevant officials (e.g., Gold Board, GGMC, MNR), to improve traceability of MSG consideration of key issues and address recurring Oslo observations.	Secretariat

Prepared by: GYEITI Secretariat

Attendance

Name	Organization / Role	Constituency	Gender	Present	Excused	A
Joachim Vogt	ECO Atlantic — Acting Chair	Industry	M	✓		
Sonya Roopnauth	Ministry of Finance — Chair	Government	F		✓	
Rafael Singh	Guyana Revenue Authority (GRA) — Member	Government	M	✓		
Rafeek Khan	Guyana Manufacturers & Services Assoc. — Member	Industry	M	✓		
Anil Persaud	Member	Government	F	✓		
Derrick John	Member	Civil Society	M	✓		
GYEITI Secretariat & Consultants						
Renrick Ramgobin	GYEITI Secretariat — Observer	Observer	M	✓		
Rajdai Jagarnauth (RJ)	GYEITI Secretariat — Observer	Observer	F	✓		
Sam Tokpah	Consultant — Observer	Observer	M	✓		

September 24, 2026

MINUTES OF THE 5th MSG REVIEW MEETING OF THE DRAFT VALIDATION REPORT, HELD ON SEPTEMBER 25, 2026

VIRTUAL VIA ZOOM: 09:02 HRS – 10:30 HRS

Chair: MS. SONYA ROOPNAUTH, CHAIRPERSON OF THE WORKPLAN, VALIDATION AND TOR COMMITTEE

1. Call to Order and Opening Remarks

The meeting was called to order at approximately 09:02 hrs. Ms. Sonya Roopnauth opened the session and confirmed that the Secretariat and key members were present and ready to proceed. She acknowledged and thanked Mr. Joachim Vogt, who Chaired the previous review Meeting and for the the brief recap of the previous day's discussions. The Chair confirmed that the session would focus on **Section 3.5 — Revenue Management and Subnational Contributions**, with a view to also commencing **Section 3.6 — Environmental and Social Impacts** if time permitted. The committee agreed to address each requirement by referring directly to its respective paragraphs within Section 3.5, rather than reading the summary paragraph in isolation.

2. Members' Attendance

Members in attendance, virtually, are recorded in the attendance sheet attached below.

3. Announcements

The Secretariat noted that Mr. Rafael Singh had communicated via the meeting chat that he was unable to join the session. Ms. Roopnauth acknowledged this and indicated that the committee would proceed given the presence of other members. It was also noted that the Consultant joined the session later in the meeting and contributed substantively to the discussions on Requirements 5.1, 4.6, 5.2, and 6.1.

4. Review Process — Section 3.5 (Revenue Management and Subnational Contributions)

The committee conducted a paragraph-by-paragraph review of Section 3.5 of the Draft Validation Report, focusing on requirements with corrective action potential ahead of the **October 16, 2026,** deadline and identifying issues for resolution at the upcoming MSG meeting on **October 7, 2026**. The committee reviewed Requirements 5.1, 5.3, 4.6, and 5.2 in turn.

5. Substantive Review — Section 3.5

5.1 Requirement 5.1 — Off-Budget Revenue Disclosures and Audit Backlogs (Assessed: Good)

The Chair noted that Requirement 5.1 was assessed as **good**, but that the rating fell short of **very good** largely due to outstanding issues relating to NICIL and GGMC. She confirmed that the initial communication to NICIL had been sent to the wrong contact but had since been corrected and directed to Mr. Sharma of NICIL. The Secretariat confirmed that no response had yet been received, and that Mr. Sharma had indicated he would make direct contact with the Chair - Ms. Roopnauth. The Chair agreed to follow up with Mr. Sharma directly after the meeting.

The committee discussed the corrective actions outlined in the report, specifically:

- The requirement for EITI to publish a **time-bound roadmap** to clear audit backlogs for off-budget agencies, including NICIL and GGMC. The committee noted that even if not published externally, the development of an internal timeline coordinated with the relevant agencies would constitute a meaningful positive step and demonstrate the MSG's active engagement.
- The requirement to **ensure publication of NICIL's financial statements**. The committee agreed that the word "ensure" was inappropriate, as EITI does not have the authority to compel publication. The committee suggested replacing "ensure" with "strongly encourage" or "urge," and the Secretariat was asked to annotate the document for clarification with the Oslo team.

On the strategic recommendations, the chair raised two concerns:

- The recommendation that the government publish a clear policy on the remittance of agency-collected funds to the consolidated fund again used the word "ensure," which was considered beyond EITI's remit.
- The recommendation that the Bureau of Statistics (BOS) collaborate with relevant government agencies to strengthen data accuracy was considered **redundant and outside EITI's remit**, as this is the BOS's core mandate. It was proposed that this his recommendation be removed from the EITI response.

In response to clarification on which agencies, beyond GRA, contribute funds to the consolidated fund, the Chair explained that agencies such as GGMC and Guy Oil may make transfers to the consolidated fund, though this had not occurred in the most recent reporting year.

The committee agreed that the Secretariat should prepare a draft advisory note on NICIL, incorporating inputs from the Consultant and other stakeholders, to support the MSG's position. It was also agreed that the Secretariat should communicate officially in writing to the IA regarding data inconsistencies identified in previous reports.

5.2 Requirement 5.3 — Revenue Projections and Forward-Looking Disclosures (Assessed: Very Good)

Requirement 5.3 was assessed as **very good**, reflecting strong systematic disclosures on the Natural Resource Fund (NRF) budget and audit processes, revenue projections, and cost recovery. However, the report noted that further granularity is needed on disaggregated extractive revenue projections, production costs, commodity price assumptions, and gender-related initiatives, and that subnational revenue disclosures remain weak.

The committee examined the strategic recommendation that EITI publish underlying assumptions related to projected revenues, and disclose disaggregated information related to **specific programs where they exist**. The Chair noted that it was unclear what "specific programs" referred to, and requested that the Secretariat seek clarification from the Oslo team. The Secretariat was asked to annotate the document accordingly.

The committee also flagged the statement that **"subnational revenue disclosures remain weak"** . The Committee that this statement require clarification, as no specific recommendation accompanied the statement and the committee was concerned it presented a more negative picture than warranted without sufficient context.

The Secretariat was asked to check with the Consultant whether existing budget and mid-year report publications adequately address the revenue projection disclosure expectations, and to seek country examples if available.

5.3 Requirement 4.6 — Direct Subnational Payments (Assessed: Limited)

Requirement 4.6 was assessed as **limited**, primarily because village tributes — payments required under the Amerindian Act from small and medium-scale mining license holders to village councils — are not included in the 2023 reconciliation, owing to difficulties in tracking licenses on indigenous lands and weak record-keeping at the village level.

The committee noted that under the Amerindian Act, mining license holders must pay at least **7% of the value of minerals obtained from Amerindian lands** directly to village councils. However, Mr. Vogt clarified that the principal obstacle is not traceability per se, but the lack of properly constituted entities to receive these payments — a structural issue that goes beyond EITI's remit.

He also recalled that this matter had been discussed at a prior workshop with the Ministry of Parliamentary Affairs and Governance, where Mr. Newell Dennison, the Commissioner of the GGMC had confirmed that GGMC's inability to process these payments stemmed from the absence of formally registered village entities capable of receiving funds.

The committee agreed on the following actions:

- The Secretariat, on behalf of the MSG, to write to the **Ministry of Amerindian Affairs**, copying the Ministry of Finance and MPAC, to highlight the Validation Report's concern regarding village tributes and to request a status update on progress in establishing accountability frameworks at the village level.
- The Secretariat to **verify the definition of "direct subnational payments"** under Requirement 4.6 to confirm whether payments from private mining companies to village councils qualify under this definition.
- The Secretariat to follow up with GGMC to clarify **contractual obligations** regarding the 7% payment, and to obtain a list of companies subject to this obligation from GGMC's records.

On the corrective actions, the committee agreed that while EITI could support the development of a standardized reporting template and record-keeping system in collaboration with the Ministry of Amerindian Affairs and GGMC, the modernization of the mining cadastral system was beyond EITI's direct remit — and that the language in the report should be softened accordingly. The committee also noted the recommendation to implement a unique taxpayer ID system and requested a status update from GGMC and GRA, with the Secretariat to arrange a brief virtual meeting among the three parties.

5.4 Requirement 5.2 — Royalty Sharing and Production on Village Lands (Assessed: Limited)

Requirement 5.2 was assessed as **limited** because GGMC lacks reliable records to track mining production on village lands and cannot accurately apply the royalty-sharing formula. The committee noted this as another area requiring follow-up engagement with GGMC.

The committee discussed the corrective actions, which included:

- EITI clarifying adherence to mandatory transfers, including how these have been calculated historically, and ensuring disaggregated reporting with a breakdown of expected versus actual transfers by subnational unit.
- GGMC ensuring that all mining agreements on Amerindian lands are registered through the Commission to enable accurate calculation of the **20% royalty share** based on verified production.

On the strategic recommendation encouraging proactive engagement with the **ongoing revision of the Amerindian Act** to codify provisions for public disclosure of extractive-related income at village level, the committee agreed that the Secretariat should reach out to the Permanent Secretary of the Ministry of Amerindian Affairs to ascertain the status of the Act's revision and whether the MSG may wish to make a submission.

The committee also discussed the recommendation to provide information on actual disbursements of extractive revenues earmarked for specific programs. Ms. Roopnauth, his her capacity as Director of Budget, confirmed that **Guyana does not earmark extractive revenues**, with the only notable exception being the 15% of carbon credits allocated directly to indigenous communities. Mr. Vogt noted that this issue had recurred throughout the validation review and suggested that a clear, official statement be obtained from the Minister of Finance confirming that Guyana's public financial system does not operate on the basis of earmarking, as this would resolve the matter definitively for Oslo. The Chair agreed to raise the matter with Minister Singh and to draft a statement for his approval, drawing on the NRF Act and relevant budget documentation.

6. Review — Section 3.6 (Environmental and Social Impacts)

6.1 Requirement 6.1 — Social and Environmental Payment Disclosures (Assessed: Limited)

The committee commenced its review of Section 3.6, focusing on Requirement 6.1, which was assessed as **limited** due to inconsistent classification of social and environmental payment disclosures, unclear legal basis for reported expenditures, absence of beneficiary detail, and lack of reconciliation and assurance.

Mr. Vogt provided context on mandatory versus voluntary CSR obligations across different contractual regimes:

- Under **older PSAs**, companies had voluntary CSR spending, with some agreements (e.g., the Stabroek agreement) specifying a mandatory amount of USD 300,000.
- Under the **new PSA regime** (e.g., the S4 block agreement with Total Petroleum), companies are obligated to spend USD 1 million per year on community projects agreed with the Minister. Unspent amounts accumulate to the following year. This regime is new and has not yet been captured in EITI reporting.
- The **Greater Guyana Initiative**, led by ExxonMobil, involves multi-year, structured social spending at scale — with contracted implementing entities — which Mr. Vogt considered to be well-documented but not yet fully visible in EITI reports.

The Consultant contributed the following observations on addressing Requirement 6.1:

- The MSG must first agree on a **materiality threshold** for social and environmental expenditure disclosures, separate from — or aligned with — the existing revenue materiality threshold. The absence of such a definition is a primary reason for the current "limited" assessment.
- The MSG must decide on the **disclosure modality**: unilateral disclosure from companies alone, disclosure from the government side alone, or a fully reconciled template drawing on both sides. Sam noted that most developing countries have opted for **unilateral disclosure** from companies given the practical challenges of reconciliation.
- At a minimum, the **contractual CSR obligations** across all active agreements should be made publicly known, with a nil materiality threshold applied to mandatory obligations — ensuring the public is aware of what government has committed companies to deliver.

Mr. Vogt noted that social spending had already been reported in recent industry templates, segregated between environmental and social categories, and questioned why the report characterized disclosure as incomplete. He suggested that the Local Content Secretariat and the Ministry of Natural Resources (MNR) may hold relevant data given reporting obligations under the Local Content Act.

The Chair proposed that constituency representatives — government, industry, and civil society — each take the disclosure options back to their respective groupings for discussion and return with feedback within **one week**. Mr. Derrick John confirmed that civil society would do so. Ms. Roopnauth agreed to facilitate the same discussion on the government side.

7. Secretariat Workplan and Submission Timeline

The Chair invited the Secretariat to provide a verbal update on active workstreams and pending tasks. The Secretariat confirmed that the two principal documents under active preparation are:

- The **project definition** decision support sheet for the October 7 MSG meeting.
- The **initial intervention** document.

The Secretariat also confirmed it is seeking clarification from GGMC on revenue disclosures and noted that further information is being sought through the Permanent Secretary.

On the **2023 Inception Report**, the Secretariat confirmed that, following MSG member feedback — primarily on data matters — it is responding to the IA directly rather than reconvening the MSG, with the expectation of a resubmitted report thereof. The Consultant confirmed that he is working directly with GGMC and GGB to scrub and finalize the corrected data table for submission to the IA, with a target of completing the final version within approximately two hours of the meeting. He noted that the Permanent Secretary had indicated an intention to speak with the IA on the same day regarding the submission.

The committee discussed the timeline for submitting the MSG's response to the Validation Committee in Oslo by the **October 16, 2026,** deadline. Mr. Vogt proposed that a partial response be submitted on the 16th addressing all resolved matters, with a request for a short extension to incorporate the outcome of the civil society representative selection process. The Consultant noted that the CSO meeting to fill vacant MSG seats is scheduled for **October 19, 2026** — after the response deadline — and that the outcome of this process is directly relevant to addressing Requirement 1.4 (MSG Governance, assessed as limited). The committee agreed that:

- A **partial response** should be submitted to Oslo by October 16, 2026, addressing all requirements where the MSG's position has been finalized.
- The Secretariat should simultaneously **request an extension** to allow for the incorporation of information on civil society representation following the October 19 CSO meeting.
- The Consultant, with support from the Secretariat, will draft a statement on MSG governance (Requirement 1.4) for review by Mr. Derrick John (civil society) and industry prior to submission.

The Secretariat was also asked to prepare a **response to the strategic recommendations** in the Validation Report for presentation to the MSG on October 7, 2026, and to provide a verbal recap of all active workstreams and tasks to MSG members prior to that meeting.

8. Pause and Next Session

At approximately 10:10 hrs., The Chair paused the review session to allow the Secretariat adequate time to work on the identified action items. The Secretariat confirmed it would benefit from the time. The committee agreed to **resume the review on Tuesday**, with the Chair indicating she would be in touch with the Secretariat regarding any further support she could provide in the interim — including direct follow-up with NICIL's Mr. Sharma and other relevant contacts. The Chair thanked all participants for their engagement and adjourned the meeting at approximately 10:30 hrs.

9. Key Decisions / Actions

No.	Area	Decision / Action	By Whom
1	NICIL — Follow-Up Communication	Ms. Roopnauth to contact Mr. Sharma of NICIL directly after the meeting to follow up on the outstanding communication and obtain a response.	Sonya Roopnauth
2	NICIL — Advisory Note	Secretariat to prepare a draft advisory note on NICIL, incorporating inputs from the Consultant and other stakeholders, to support the MSG's position.	Secretariat / Sam Tokpah
3	IA Communication — Data Inconsistencies	Secretariat to communicate officially in writing to the Independent Administrator (IA) regarding data inconsistencies identified in previous reports, and to engage the IA for explanations or corrections.	Secretariat
4	Req. 5.1 — Report Language (Ensuring vs. Encouraging)	Secretariat to annotate the document flagging that "ensure" should be replaced with "strongly encourage" or "urge" in relation to NICIL financial statement publication, and to seek clarification from the Oslo team on the intent of this language.	Secretariat
5	Req. 5.3 — "Specific Programs" Clarification	Secretariat to seek clarification from the Oslo team on the meaning of "disaggregated information related to specific programs" under Requirement 5.3, and to annotate the document for follow-up.	Secretariat

6	Req. 5.3 — Revenue Projection Disclosures	Secretariat to check with the Consultant whether existing budget and mid-year report publications sufficiently address the revenue projection disclosure expectations under Req. 5.3, and to obtain country examples where available.	Secretariat / Sam Tokpah
7	Req. 4.6 — Village Tributes — Letter to Ministry of Amerindian Affairs	Secretariat to draft a letter from the MSG to the Ministry of Amerindian Affairs (copying Finance and MPAC) highlighting the Validation Report's concern regarding village tributes and requesting a status update on accountability frameworks at the village level.	Secretariat
8	Req. 4.6 — Definition of Direct Subnational Payments	Secretariat to verify the definition of "direct subnational payments" under Requirement 4.6 to confirm whether company-to-village-council payments qualify under this category.	Secretariat
9	Req. 4.6 — Unique Taxpayer ID System Update	Secretariat to request an update from GGMC and GRA on the status of the unique taxpayer ID system, and to arrange a brief virtual meeting among GGMC, GRA, and EITI to discuss progress.	Secretariat
10	Req. 5.2 — Amerindian Act Revision	Secretariat to contact the Permanent Secretary of the Ministry of Amerindian Affairs to ascertain the status of the Amerindian Act revision and to explore whether the MSG wishes to make a formal submission regarding extractive income disclosure at the village level.	Secretariat
11	Earmarking — Official Statement	Ms. Roopnauth to discuss with Minister Singh the possibility of issuing an official statement clarifying that Guyana's public financial system does not earmark extractive revenues, and to draft a statement for his approval drawing on the NRF Act and relevant budget documentation.	Sonya Roopnauth
12	Req. 6.1 — CSR Disclosure Modality	Constituency representatives (government, industry, civil society) to consult their respective groupings and provide feedback within one week on the preferred disclosure modality for social and environmental expenditures (unilateral disclosure, nil materiality with contractual obligations, or full reconciliation).	All Constituencies
13	GGMC — Corrected Data Table	The Consultant to assist GGMC in finalizing the corrected data table and submit to the IA by end of day, 09/25/2026.	Sam Tokpah
14	Req. 1.4 — MSG Governance Statement	The Consultant, supported by the Secretariat, to draft a statement on MSG governance for review by Mr. Derrick John (civil society) and industry, for inclusion in the MSG's Validation response.	Sam Tokpah / Secretariat

15	Validation Response — Strategic Recommendations	Secretariat to develop a response to the strategic recommendations in the Validation Report for presentation to the MSG on October 7, 2026.	Secretariat
16	Validation Response — Partial Submission and Extension Request	Secretariat to submit a partial response to the Validation Committee by October 16, 2026, addressing all resolved matters, and to simultaneously request an extension to incorporate the outcome of the civil society seat selection process following the October 19, 2026, CSO meeting.	Secretariat
17	Secretariat Workstream Recap	Secretariat to provide a verbal recap of all active workstreams and tasks to MSG members prior to the October 7, 2026, meeting.	Secretariat

Prepared by: GYEITI Secretariat

September 25, 2026

10. Attendance

Name	Organization / Role	Constituency	Gender	Present	Excused	Absent
Sonya Roopnauth	Ministry of Finance — Chair	Government	F	✓		
Joachim Vogt	ECO Atlantic — Member	Industry	M	✓		
Rafeek Khan	Guyana Manufacturers & Services Assoc. — Member	Industry	M	✓		
Rafael Singh	Guyana Revenue Authority (GRA) — Member	Government	M		✓	
Derrick John	Member	Civil Society	M	✓		
Jennifer Persaud-Boodhoo	Member	Government	F	✓		
GYEITI Secretariat & Consultants						
Rajdai Jagarnauth (RJ)	GYEITI Secretariat — Observer	Observer	F	✓		
Johann Earle	GYEITI Secretariat — Observer	Observer	M	✓		
Sam Tokpah	Consultant — Observer	Observer	M	✓		
Ashantie Williams	GYEITI Secretariat — Observer	Observer	F	✓		
Renrick Ramgobin	GYEITI Secretariat — Observer	Observer	M	✓		

September 25, 2026

MINUTES OF THE 6th MSG REVIEW MEETING OF THE DRAFT VALIDATION REPORT, HELD ON SEPTEMBER 29, 2026

VIRTUAL VIA ZOOM: 15:00 HRS – 17:00 HRS

Chair: MS. SONYA ROOPNAUTH, CHAIRPERSON OF THE WORKPLAN, VALIDATION AND TOR COMMITTEE

1. Call to Order and Opening Remarks

The meeting was called to order at approximately 15:06(is this time correct) hrs by the GYEITI Secretariat, who informed participants that the Chair - Ms. Sonya Roopnauth would be joining at 15:30 hrs. (3:30 PM). and as such that proceedings were on hold pending the Chair's arrival.

At approximately 15.38 hrs., with Ms. Roopnauth not yet present, the GYEITI Secretariat consulted with members regarding alternative chairing arrangements. Mr. Rafeek Khan and Mr. Joachim Vogt volunteered to co-chair, The group agreed to proceed with Mr. Khan co-chairing alongside Mr. Vogt until Ms. Roopnauth' arrival.

Ms. Roopnauth joined the meeting at approximately 15:42 hrs. and immediately assumed the chair. She apologized for the delay and requested that participants continue from where the interim discussion had begun. The Secretariat confirmed that the committee had stopped at Requirement 6.4 on the final page of the recommendations section during the previous session. Ms. Roopnauth confirmed that the session would focus on completing Section 3.6 — Environmental and Social Impacts (pages 45–49), specifically Requirement 6.4, and would then return to earlier sections including Section 3.2 — Licenses, Contracts, and Ownership, which included Requirement 2.2.

The Chair expressed the desire for the Committee to complete the review of the entire Validation Report by Friday, September 30, 2026, and that a special MSG meeting is proposed for October 7, 2026, to review the Validation Report findings and decision papers, followed by the statutory MSG meeting on October 14, 2026.

2. Members' Attendance

Members in attendance, virtually, are recorded in the attendance sheet. Attendees included representatives from government, industry, civil society, and the Consultant/Independent Administrator. Mr. Derrick John (civil society) experienced significant connectivity issues throughout the session and was unable to participate effectively. Ms. Madhavi Indarjeet joined early in the session but left before the substantive discussions concluded. The Secretariat confirmed a total of 13 participants at various points during the meeting.

3. Announcements

The Secretariat noted that Civil Society Co-Chair ,Mr. Derrick John had communicated via the meeting chat that he was experiencing connection problems, with his internet intermittently dropping. The Chair acknowledged this and requested that the Secretariat arrange for more effective participation

of Mr. John in subsequent meetings, possibly by email or other means, to ensure civil society input was adequately captured.

The Secretariat also reminded members that the EITI International Conference would take place during the week of October 5–10, 2026, in Brussels, Belgium, and that several MSG members and Secretariat staff would be traveling. This would affect availability during that week, and alternative arrangements for meetings were discussed later in the session.

4. Review Process — Section 3.6 (Environmental and Social Impacts)

The committee conducted a detailed review of Section 3.6 of the Draft Validation Report, focusing on Requirement 6.4 — Environmental Governance and Oversight, which had been assessed as *limited*. The Chair confirmed that the committee would read through the relevant paragraphs on pages 45–49, identify areas requiring clarification or corrective action, and agree on follow-up communications to be sent to the Environmental Protection Agency (EPA) and the Guyana Geology and Mines Commission (GGMC) ahead of the October 16, 2026, deadline for submitting the MSG's response to the EITI Validation Team.

Following completion of Requirement 6.4, the committee agreed to return to Section 3.2 — Licenses, Contracts, and Ownership, to address Requirement 2.2 — Licensing Procedures, which had also been assessed as *limited*.

5. Substantive Review — Section 3.6

5.1 Requirement 6.4 — Environmental Governance and Oversight (Assessed: Limited)

The Chair directed the Meeting attention to Requirement 6.4 and to the introductory paragraph on page 45, which stated that Guyana provides a useful overview of the environmental governance framework for the extractive sector, including permitting and environmental impact assessments. However, the report noted that the completeness and currency of the disclosures remained unclear, and that while GYEITI had improved public understanding of environmental management since the last validation — including on issues such as mercury pollution and social impacts, including gender-related risks — reporting remained stronger on the framework than on implementation.

The report further stated that GYEITI did not yet provide a clear picture of how environmental oversight functions in practice, including monitoring results, inspections, enforcement, sanctions, and compliance. This was identified as particularly important given growing mining activity on or near Amerindian lands and related concerns over access to environmental information. The report recommended that future reporting should move beyond describing rules and institutions to systematically disclose evidence of environmental monitoring, compliance, and enforcement.

The Chair asked whether the lack of clarity related specifically to EPA functions or also to GGMC. Mr. Vogt clarified that the requirement pointed to both agencies in their respective oversight roles and noted that there was an important distinction to be made between three types of environmental obligations:

- Ongoing operational monitoring obligations under EPA permits, which require various measurements on the stream of operations;

- Incident-based reporting, where an uncontrolled release of chemicals or other materials occurs, whether in oil and gas or mining; and
- Decommissioning and restoration obligations, particularly in mining, where there is a legal obligation to restore land to its initial state to some extent.

The observation was made that the Oslo Secretariat's claim in the report did not sufficiently distinguish between these three categories, and that the issues were therefore somewhat conflated. He noted that in oil and gas, decommissioning of production projects had not yet occurred, and that decommissioning of exploration wells was managed under EPA operations permits and GGMC oversight, with no known issues. However, he acknowledged that follow-up on restoration of mining operations was not necessarily fully captured in all cases.

It was further explained that the EPA held all the data from operations permits, but that he was not aware of how EPA managed ongoing monitoring for mining operations — such as water measurements and sampling — or whether this fell under GGMC oversight. He suggested that the claim in the report was somewhat excessive in its judgment, as it implied that there was no environmental assessment or consideration, when in fact the difference lay primarily in the public consultation process rather than the technical assessment itself.

The Chair proposed that the Secretariat write separately to EPA and GGMC to request case studies — preferably two — that demonstrate how environmental monitoring, inspections, enforcement, sanctions, and compliance are conducted, including evidence of implementation. The committee agreed that this would provide concrete examples to strengthen the MSG's response.

The Consultant interjected to note that, to the best of his knowledge, as part of the mainstreaming exercise undertaken by EPA a year or two ago, environmental impact assessment documents should already be available on the EPA website. However, he expressed concern that during a recent website update, some documents may have been lost in translation. He suggested that the Secretariat follow up with EPA to confirm whether the documents referenced in the report — including environmental impact assessments — were still available online, and if so, to advise on their location.

The Consultant further clarified that there was a distinction between Environmental Impact Assessments (EIAs), which are prepared in advance of operations for permitting purposes, and ongoing operational monitoring data. He suggested that if the EPA could confirm the availability of EIAs and related oversight information online, this alone could improve the score from "limited" (50 points) to a higher bracket, as the report may have overlooked publicly available information.

The committee agreed on the following actions:

- The Secretariat to follow up with EPA to confirm whether environmental impact assessments and related documents referenced in the report are still available on their website, and to advise on their location.
- The Secretariat to write separately to EPA and GGMC requesting case studies (preferably two) that demonstrate how environmental monitoring, inspections, enforcement, sanctions, and compliance are conducted, including evidence of implementation.
- The Secretariat to clarify the distinction between Environmental Impact Assessments (EIAs) and ongoing operational monitoring data in the follow-up correspondence.

5.2 Stakeholder Views on Environmental Transparency and Oversight

The Chair proceeded to the stakeholder consultation findings on page 46, which highlighted divergent views on environmental management, transparency, and oversight in the extractive sector. Concerns focused on weak tracking and disclosure of environmental deposits held by GGMC, raising questions about accountability for land restoration obligations. Stakeholders also noted limited public information on mandatory and voluntary social payments, including uncertainty over the use of funds under the Stabroek block agreement and the absence of readily accessible expenditure reporting for the Greater Guyana Initiative (GGI).

The report further noted that views differed on environmental impact assessments and monitoring. Industry stakeholders considered that key EIAs were publicly available and that the permitting process had taken a pragmatic approach, particularly for offshore projects where baseline data and technical studies are complex. However, civil society stakeholders raised concerns about exemptions from EIA requirements, limited responsiveness to public objections, inconsistent disclosure of project information, and weak transparency for environmentally sensitive projects.

Broader concerns were raised about the effectiveness of environmental oversight, especially in mining and forestry, and its implications for indigenous land rights. Stakeholders cited disputes over mining on or near titled Amerindian lands as evidence that stronger disclosure, monitoring, consultation, and enforcement are needed to ensure environmental accountability and protect affected communities.

The Chair sought Mr. Derrick John, the civil society representative inputs on these concerns. However, Mr. John experienced significant connectivity issues and was unable to respond effectively. Committee member Mr. Vogt clarified the issue of "exemptions" from EIA requirements, noting that the term was somewhat approximate. He explained that it was not an exemption in the strict sense, but rather an alternative pathway whereby the EPA assesses what is needed for a project in terms of environmental permitting using its own expertise, rather than reaching out to wider civil society through a full public consultation process. He emphasized that this did not mean there was no environmental assessment or consideration — the technical assessment remained the same, and any reputable oil company would conduct an Environmental and Social Impact Assessment (ESIA) internally regardless of regulatory requirements. The difference, he noted, lay solely in the consultation process.

Mr. Vogt acknowledged that the word "exemption" had entered public discourse and would not be removed from the report, but cautioned that it represented an approximation that lacked sufficient clarity and could lead to misunderstanding. The Chair agreed, and suggested that when the Secretariat writes to EPA regarding the earlier paragraph, it could also share the stakeholder views paragraph and invite EPA to provide quantitative data about exemptions versus full EIA requirements, if available, to present a more balanced picture.

Committee member Mr. Rafeek Khan raised a question about the Greater Guyana Initiative (GGI), recalling that an earlier session had highlighted this issue. The Chair confirmed that GGI was mentioned in the stakeholder views paragraph as having an absence of readily accessible expenditure reporting. She noted that she had not personally reviewed whether GGI had publicly accessible information, and that the committee would not take further action on this point at present, as it fell under the broader category of voluntary social payments discussed under Requirement 6.1.

5.3 Assessment and Corrective Actions for Requirement 6.4

The Chair proceeded to page 47, where the assessment summary for Requirement 6.4 was set out. The report concluded that Guyana discloses the environmental regulatory framework and permits, but that limited reporting on monitoring, compliance, and enforcement prevents full implementation of the requirement. The assessment was therefore *limited*.

The corrective actions specified that, in accordance with Requirement 6.4, GYEITI should ensure that documentation related to oversight of social and environmental impacts — including environmental, social, and gender impact assessments, monitoring reports, permits, and licenses that are mandated by law — are publicly accessible in practice. The MSG was encouraged to disclose information on environmental and social monitoring activities, and the outcomes of these activities, in a format that is accessible to impacted communities.

The Chair asked whether there were any specific incidents that had occurred which had not been made public, or whether this was a general observation. Mr. Vogt responded that the requirement was broad and did not point to specific incidents, but rather to systematic gaps in public reporting on monitoring and enforcement activities. He reiterated that much of the required information likely already existed, particularly in the form of published ESIAs for major projects such as those in the Stabroek block, which were comprehensive and technically outstanding documents. He suggested that if the Validation team assessment was based on the availability of such material, then Guyana's performance in this area would indeed be very strong.

The committee agreed that the Secretariat's follow-up communications to EPA and GGMC, as discussed earlier, would directly address the corrective actions and potentially provide sufficient evidence to improve the score from *limited* to a higher bracket.

6. Return to Section 3.2 — Licenses, Contracts, and Ownership

6.1 Requirement 2.2 — Licensing Procedures (Assessed: Limited)

Following the completion of Section 3.6, the Chair directed the committee's attention to Section 3.2 — Licenses, Contracts, and Ownership, noting that the committee had approximately 13 minutes remaining before the scheduled end time of the session. She confirmed that the committee would focus on Requirement 2.2, which had been assessed as *limited*, and would continue with the remainder of Section 3.2 in the next meeting.

The Chair directed the Meeting to the introductory paragraph on page 27, which stated that Guyana had improved transparency on licensing, contracts, and beneficial ownership, but that disclosures remained stronger on formal rules rather than implementation. Requirement 2.2 was assessed as *limited* because, while licensing procedures were described, key information was missing on how criteria are applied, when auctions or lotteries are used, when deviations occur, and how consultation requirements — including free, prior, and informed consent (FPIC) on Amerindian lands — are implemented.

The Consultant interjected to note that the report did not clearly state what the financial and technical criteria in the award of licenses are, both in the oil and gas sector and in the mining sector. He noted that while the report focused on FPIC, there was also a need to clarify the processes followed when it comes to large-scale mining, medium-scale mining, and the oil sector. He suggested that the

Secretariat reach out to the Ministry of Natural Resources (MNR) and GGMC to request clear documentation of the processes followed under different scenarios, including how financial and technical criteria are defined and assessed.

The Consultant further noted that some of this information was already available publicly, but that the report had failed to capture it. He suggested that if the MSG could obtain clear documentation from MNR and GGMC, there was sufficient room to improve the score, as it was largely a question of clearly stating the processes rather than creating new systems.

The Chair asked what Guyana's previous score on Requirement 2.2 had been, noting that the report stated, "Guyana has improved disclosure since last validation," yet the current score was only 50 (limited). The Consultant indicated that he would need to check, but suggested that if this was the improved score, the previous score must have been lower. The Chair expressed concern at the low score and emphasized the need to take action to improve it.

The Consultant elaborated that the Oslo Secretariat appeared to be seeking information on how the license application process works in practice, including the assessment mechanism for applying technical and financial criteria. He suggested that when the Secretariat communicated with MNR and GGMC, it should prefix the request with clear, non-technical language. For example, rather than simply asking for "financial and technical criteria," the communication should clarify that the EITI is requesting information on the *assessment mechanism* — such as how competing bids are weighted (e.g., financial criteria 60%, technical criteria 40%), and what the specific assessment process entails.

The Chair agreed and proposed that the Secretariat extract all sections related to Requirement 2.2 from the report — including the introductory paragraph, the detailed assessment on pages 27–28, the corrective actions on page 30, and the relevant stakeholder views — and compile them into a single communication to be sent to the Permanent Secretary (PS) of the Ministry of Natural Resources. The communication should request information on how the license application process works in practice, including the assessment mechanisms for financial and technical criteria, and whether this information is posted publicly. The Secretariat was asked to request a response by Thursday, October 1, 2026, at 12:00 hrs., to allow sufficient time for incorporation into the MSG's response.

The Consultant agreed to assist the Secretariat in drafting the contextual paragraph to accompany the communication, to ensure that the request was framed in clear, accessible language that would enable MNR and GGMC to provide a targeted response that meets the EITI requirement.

The Chair further suggested that she would make direct contact with the Permanent Secretary after the Secretariat sent the communication, to flag its urgency and to advise that as the committee progressed through the report, additional communications on related matters might follow, to maximize the limited turnaround time available.

The committee agreed on the following actions:

- The Secretariat to extract all sections related to Requirement 2.2 (licensing procedures, technical and financial criteria, FPIC) from the report, compile them, and send them to the Permanent Secretary of the Ministry of Natural Resources, requesting information on how the license application process works in practice, including assessment mechanisms for criteria. The Secretariat requests a response by Thursday, October 1, 2026, at 12:00 hrs.

- The Consultant to assist the Secretariat in drafting the contextual paragraph to accompany the communication to GGMC/MNR, clarifying what the EITI is requesting regarding the assessment mechanism for licensing criteria.
  The Chair will directly contact the Permanent Secretary to inform him of the urgent communication from the Secretariat regarding Requirement 2.2, and to advise that further communications may follow as the review progresses.

7. Discussion on NICIL Document and SOE Definition

Before concluding the substantive review, Mr. Vogt raised a minor point regarding the NICIL decision paper that had been circulated by the Secretariat prior to the meeting. He commended the document as an excellent support for the MSG's decision-making, but noted that nowhere in the document was the acronym "SOE" defined. He suggested that the first time SOE appeared in the text, there should be a plain-text explanation of its meaning (State-Owned Enterprise or State-Owned Entity).

The Chair endorsed the suggestion that the Secretariat would ensure that the NICIL document included a plain-text explanation of the acronym "SOE" at its first mention. She further noted that she would share the NICIL document with Mr. Sharma of NICIL and follow up with the Minister for feedback, particularly on the highlighted provision regarding the 95% threshold that had been flagged for clarification. She confirmed that legislative references would also be provided to support the document.

The committee agreed on the following action:

- The Secretariat to ensure the NICIL document includes a plain-text explanation of the acronym "SOE" (State-Owned Enterprise) at its first mention.

8. Timeline Planning and Upcoming Meetings

The Chair elaborated on the timeline for completing the Validation Report review and the scheduling of upcoming MSG meetings. She confirmed that the committee would meet on Wednesday, September 30, Thursday, October 1, and Friday, October 2, 2026, with the aim of completing the review of the entire report by Friday.

The Secretariat noted that the EITI International Conference would take place during the week of October 5–10, 2026, in Oslo, and that several MSG members and Secretariat staff would be traveling, which would affect availability during that week. The Secretariat proposed that the regular Work Plan and Validation Committee meeting scheduled for Friday, October 2, 2026, be converted into a full working session to address any outstanding matters remaining from the Validation Report review.

The Secretariat further proposed that a special MSG meeting be convened on October 7, 2026, to review the Validation Report findings and to consider decision papers on key issues including the treatment of NICIL, project definition, and other matters requiring MSG approval. This would be followed by the statutory MSG meeting on October 14, 2026, where final sign-off would be given for transmission of the MSG's response to the Oslo Secretariat.

The Consultant raised a concern regarding the timing of the October 7 meeting, noting that he and other members would be in Brussels for the conference during that week. He suggested that the meeting could be held early in the morning Guyana time (e.g., 08:00 or 09:00 hrs) to accommodate

the six-hour time difference, as conference activities would primarily take place in the late afternoon and evening -Brussels time . The committee agreed that an early morning meeting on October 7 was feasible.

The Consultant further raised the question of whether the MSG should seek an extension to the October 16, 2026, deadline for submitting its response to the draft Validation Report. He noted that the ongoing civil society consultation process, which was addressing concerns related to Requirement 1 (MSG Oversight), was not due to conclude until October 19, 2026, and that the MSG had not yet had an opportunity to discuss Requirement 1 in detail. He suggested that the MSG might wish to request an extension to allow time to incorporate feedback from the civil society process.

Mr. Vogt responded that while he was not opposed to the MSG requesting an extension, he would caution against pointing specifically to the civil society consultation as the reason, as this could create difficulties if the consultation process did not reach a resolution by the extended deadline. He recommended that the MSG should, as much as possible, complete its work on all other topics before the October 16 deadline, and demonstrate to the Oslo Secretariat that it had done its homework within the requested timelines. He further recommended that any request for extension should be framed in broader terms, rather than being tied specifically to the civil society process.

Mr. Vogt also emphasized the importance of holding the MSG meeting on October 7 as planned, noting that decision papers on NICIL, project definition, and other matters needed to be formally deliberated and voted upon by the full MSG, rather than being approved by round-robin email. He noted that many MSG members who had not participated in the working group sessions would not understand the context of these decisions without a full discussion, and that it was preferable to have the matter debated openly at an MSG meeting.

The Chair agreed with Mr. Vogt's points, and confirmed that the October 7 meeting would proceed as a special MSG meeting focused on the Validation Report. She noted that she would follow up with the Minister of Finance and Mr. Sharma regarding the NICIL document, and that decision papers would be tabled for the October 7 meeting, ideally by Friday, October 2, to allow MSG members sufficient time to review them in advance.

- Decision papers to be tabled for the October 7 MSG meeting by Friday, October 2, 2026, to allow members time to review in advance.
- Meetings to continue on Wednesday, September 30, Thursday, October 1, and Friday, October 2, 2026, to complete the review of the Validation Report.
- Special MSG meeting on October 7, 2026, to review the Validation Report findings and decision papers (NICIL treatment, project definition, etc.). Meeting to be scheduled early in the morning Guyana time to accommodate members attending the EITI International Conference in Oslo.
- Statutory MSG meeting on October 14, 2026, for final sign-off and transmission of the MSG's response to the Oslo Secretariat.
- Decision papers to be tabled for the October 7 MSG meeting by Friday, October 2, 2026, to allow members time to review in advance.
- The MSG to consider at the October 7 meeting whether to request an extension to the October 16, 2026, deadline for submitting its response to the draft Validation Report.

9. Adjournment

There being no further business, the Chair thanked all participants for their contributions and adjourned the meeting at approximately 17:00 hrs. The next meeting was confirmed for Wednesday, September 30, 2026, at 09:00 hrs, to continue the review of Section 3.2 — Licenses, Contracts, and Ownership.

10. Key Decisions / Actions

No.	Area	Decision / Action	By Whom
1	Req. 6.4 — EIA Availability	Secretariat to follow up with the EPA to confirm whether the environmental impact assessments and related documents referenced in the report are still available on the EPA website and, if so, to advise on their location.	Secretariat
2	Req. 6.4 — Case Studies from EPA and GGMC	Secretariat to write separately to the EPA and GGMC requesting case studies (preferably two) that show how environmental monitoring, inspections, enforcement, sanctions and compliance are conducted, including evidence of implementation.	Secretariat
3	Req. 6.4 — EIAs vs. Operational Monitoring	Secretariat to clarify, in the follow-up correspondence to the EPA and GGMC, the distinction between Environmental Impact Assessments (prepared before operations, for permitting) and ongoing operational monitoring data.	Secretariat
4	Req. 6.4 — Stakeholder Views and "Exemptions"	Secretariat, when writing to the EPA, to share the stakeholder views paragraph (page 46) and invite the EPA to provide quantitative data on exemptions versus full EIA requirements, where available.	Secretariat
5	Req. 6.4 — MSG Response Position	The MSG's response to note that the report does not distinguish between (i) ongoing monitoring under EPA permits, (ii) incident-based reporting and (iii) decommissioning and restoration. It should also clarify that an "exemption" is an alternative pathway, in which the EPA assesses permitting needs using its own expertise, and not an absence of environmental assessment.	Secretariat / Consultant
6	Civil Society Participation	Secretariat to arrange for more effective participation of Mr. Derrick John in subsequent meetings, possibly by email or other means, so that civil society views, including on environmental transparency, are captured.	Secretariat

7	Req. 2.2 — Communication to PS of MNR	Secretariat to extract all sections of the report related to Requirement 2.2 (introductory paragraph p.27, assessment pp.27–28, corrective actions p.30 and relevant stakeholder views), compile them and send them to the Permanent Secretary of MNR. The communication is to request information on how the license application process works in practice, including how financial and technical criteria are assessed, and whether this information is published. Response requested by Thursday, October 1, 2026, at 12:00 hrs.	Secretariat
8	Req. 2.2 — Contextual Paragraph	The Consultant to assist the Secretariat in drafting the contextual paragraph for the communication to MNR/GGMC, explaining in plain language what EITI is asking for on the assessment of licensing criteria.	Consultant / Secretariat
9	Req. 2.2 — Call to PS of MNR	Ms. Roopnauth to telephone the Permanent Secretary of MNR to flag the urgency of the Secretariat's communication and to advise that further communications may follow as the review progresses.	Sonya Roopnauth
10	Req. 2.2 — Previous Score	The Consultant to check Guyana's previous score on Requirement 2.2, given that the report says disclosure has improved but the current score is 50 (limited).	Consultant
11	NICIL Decision Paper — Definition of SOE	Secretariat to ensure the NICIL document includes a plain-text explanation of "SOE" (State-Owned Enterprise) at its first mention.	Secretariat
12	NICIL Decision Paper — Feedback	Ms. Roopnauth to share the NICIL document with Mr. Sharma of NICIL and follow up with the Minister for feedback, particularly on the highlighted provision on the 95% threshold. Legislative references to be added to support the document.	Sonya Roopnauth / Secretariat
13	Decision Papers — Tabling	Decision papers (NICIL treatment, project definition and other matters requiring MSG approval) to be tabled for the October 7 MSG meeting by Friday, October 2, 2026, so members have time to review them.	Secretariat
14	Decision Papers — Full MSG Deliberation	Decision papers to be debated and voted on by the full MSG at the October 7 meeting, not approved by round-robin email.	MSG
15	Review Schedule	Review meetings to continue on Wednesday, September 30, Thursday, October 1, and Friday, October 2, 2026, to complete the review of the Validation Report. The regular Work Plan and	Committee / Secretariat

		Validation Committee meeting on October 2 to be converted into a full working session on outstanding matters.	
16	Special MSG Meeting — October 7, 2026	Special MSG meeting to be held on October 7, 2026, to review the Validation Report findings and decision papers. It is to be scheduled early in the morning, Guyana time, to accommodate members attending the EITI International Conference in Oslo.	Secretariat
17	Statutory MSG Meeting — October 14, 2026	Statutory MSG meeting on October 14, 2026, for final sign-off and transmission of the MSG's response to the Oslo Secretariat.	Secretariat / MSG

Prepared by: GYEITI Secretariat

September 29, 2026

11. Attendance

Name	Organization / Role	Constituency	Gender	Present	Excused	Absent
Ms. Sonya Roopnauth	Chair, Workplan, Validation and TOR Committee / Ministry of Finance	Government	Female	✓		
Mr. Joachim Vogt	ECO Atlantic — Member	Industry	M	✓		
Mr. Rafeek Khan	Guyana Manufacturers & Services Assoc. — Member	Industry	M	✓		
Mr. Michael Munroe	MSG Member	Government	Male	✓		
Mr. Derrick John	Civil Society Representative	Civil Society	Male	✓ (connectivity issues)		
Ms. Madhavi Indarjeet	MSG Member	Civil Society	Female	✓ (left early)		
Ms. Abbigale Loncke	MSG Member	Industry	Female	✓		
GYEITI Secretariat & Consultants						
Rajdai Jagarnauth (RJ)	GYEITI Secretariat — Observer	Observer	F	✓		
Johann Earle	GYEITI Secretariat — Observer	Observer	M	✓		
Sam Tokpah	Consultant — Observer	Observer	M	✓		
Ashantie Williams	GYEITI Secretariat — Observer	Observer	F	✓		
Renrick Ramgobin	GYEITI Secretariat — Observer	Observer	M	✓		

Onica	GYEITI Secretariat — Observer	Observer	F	✓		

September 29, 2026

MINUTES OF THE 7th MSG REVIEW MEETING OF THE DRAFT VALIDATION REPORT, HELD ON SEPTEMBER 30, 2026

VIRTUAL VIA ZOOM: 09:01 HRS – 10:44 HRS

Chair: MS. SONYA ROOPNAUTH, CHAIRPERSON OF THE WORKPLAN, VALIDATION AND TOR COMMITTEE

1. Call to Order and Opening Remarks

The meeting was called to order at approximately 09:01 hrs by the GYEITI Secretariat. Ms. Sonya Roopnauth assumed the chair and confirmed that a quorum was present. Participants were welcomed and the Secretariat confirmed that the session would pick up from Section 3.2 of the Draft Validation Report — specifically Requirement 2.2 — where the committee had paused at the conclusion of the previous day's session.

Ms. Roopnauth confirmed that the primary objective of the session was to advance through Requirements 2.2 to 2.5 of Section 3.2, covering transparency in mining and petroleum licensing, contract disclosure, and beneficial ownership. She further noted that the committee would aim to conclude the session with an agreement on reviewing Section 3.1 — Extractive Sector Overview — as homework, in preparation for the following day's session, which would focus substantially on stakeholder engagement.

Ms. Roopnauth reminded members that the overall goal remained the completion of the full Validation Report review by Friday, October 2, 2026, with the special MSG meeting scheduled for October 7, 2026, and the statutory MSG meeting on October 14, 2026.

2. Members' Attendance

Members in attendance, virtually, are recorded in the attendance sheet. Attendees included representatives from government, industry, civil society, and the GYEITI Secretariat. A total of 12 participants joined at various points during the meeting. Mr. Derrick John (civil society/NTC) participated and contributed via the meeting chat at certain points during the session. Mr. Balraj Budwah (civil society) was present but noted he had not had the opportunity to read certain sections of the report prior to the meeting and was requested to submit written comments to the Secretariat by close of day.

3. Announcements

The Secretariat confirmed that the communication related to Requirement 2.2, which had been drafted the previous evening by the Consultant, had already been dispatched to the Permanent Secretary (PS) of the Ministry of Natural Resources (MNR) and to GGMC. The PS had acknowledged receipt and indicated that a submission would be made as requested by Friday.

The Chair recalled that Mr. Joachim Vogt had suggested the use of the navigation panel in the document viewer (via the View tab) to improve efficiency when moving between sections of the report, avoiding time-consuming manual scrolling. The Secretariat adopted this approach for the remainder of the session.

Mr. Derrick John submitted a comment via the meeting chat regarding FPIC and Indigenous peoples, noting that NTC had developed guidelines for village consultations but that financial support was

limited, and that NTC was developing project proposals to approach donors. This was noted and flagged for follow-up.

4. Review Process — Section 3.2 (Licenses, Contracts, and Ownership)

The committee conducted a detailed review of Section 3.2 of the Draft Validation Report, covering Requirements 2.2 through 2.5. The review focused on identifying discrepancies, gaps, and areas requiring corrective action or follow-up correspondence with relevant government agencies, including GGMC, the Ministry of Natural Resources (MNR), and the Ministry of Indigenous Peoples' Affairs, as well as with the Independent Administrator (IA).

5. Substantive Review — Requirements 2.2 to 2.5

5.1 Requirement 2.2 — Licensing Procedures (Assessed: Limited)

The Chair directed the meeting attention to Requirement 2.2, noting that the report identified improvements in the legal framework for licensing but highlighted persistent weaknesses in how qualifications are assessed, when auctions and competitive bidding are used, how deviations from procedures are addressed, and how consultation requirements — including FPIC on Amerindian lands — are implemented.

The Consultant noted that a communication had been dispatched to GGMC and the PS the previous evening, outlining the specific action points required. He highlighted that a key issue under 2.2 was the need for clear justification of why the Ministry had pivoted to using a competitive bidding process in the last quarter of 2025, and that this information should either already be contained in the 2023 EITI report or be clarified by GGMC. The committee agreed that the Secretariat should check the 2023 report first before requesting a separate standard operating procedure document from MNR.

Committee member Mr. Vogt clarified that while the Petroleum Activities Act 2023 specifies auctions as the primary avenue for awarding licenses, the law also permits direct negotiations. He cautioned that the report should not characterize the use of direct negotiations as a deviation from policy, as both pathways are grounded in the Petroleum Activities Act. The Consultant agreed, emphasizing that the key question was which option was used in each instance and what the justification was — not that one option was impermissible.

5.2 Mining License Reporting Discrepancies

The committee discussed a significant discrepancy in mining license reporting figures: GGMC had reported 12,783 licenses awarded in 2023, while the EITI report annex recorded only 2,139. The Consultant explained that the gap could be attributed to a large number of small-scale miners covered under a model license agreement, whose details were not individually listed in the report.

The Consultant proposed that GGMC be requested to provide a list of the approximately 10,000+ small-scale miners (by name only, to respect privacy concerns) and publish this list on the GGMC website, with the MSG's response to Oslo pointing to this link. Ms. Roopnauth agreed and confirmed this as an action item for the Secretariat.

Mr. Vogt raised concerns about the sensitivity of this issue and its potential impact on relationships with the gold mining sector, noting that the numbers — 35 licenses per day over the course of 2023 — would appear alarming to an external reader. He emphasized the importance of ensuring that

mining sector representatives, including entities such as the GGDMA and its representative on the MSG, were actively involved in resolving the matter, to avoid damaging trust and participation.

5.3 Mining Classification for EITI Reporting — Definition of Small, Medium, and Large-Scale Miners

The Consultant proposed that GGMC and the MSG agree on clear administrative definitions to distinguish between small-scale, medium-scale, and large-scale miners for EITI reporting purposes, noting that this was standard practice in other EITI implementing countries where artisanal and small-scale miners (ASM) are reported as a group rather than individually disclosed. He clarified that no regulatory or legislative changes would be required — the definitions would be administrative in nature and would apply solely for EITI reporting. requested that the Secretariat flag this as a priority action item, with a draft proposal to be presented to the PS and brought back to the MSG at the October 7 meeting. The Meeting supported this approach and suggested that even if a formal MSG decision could not be reached in time, an action plan demonstrating the MSG's clear intention to resolve the issue would represent a positive and credible step in the response to Oslo.

5.4 Material Deviations and License Transfers The Meeting attention was drawn to the report's statement that license transfers are published at the Deeds Registry, noting that this information — including any transfer of participating interest between companies — is submitted and registered with the Deeds Registrar by law, and therefore carries full official status. He suggested that the characterization of this information as "limited" in the report was somewhat unfair, given the legally mandated and highly official nature of the Deeds Registry. It was agreed that agreed this point should be corrected or clarified in the MSG's response.

The Consultant noted that the report's identification of an absence of any mention of material deviations was a matter that fell squarely within the IA's responsibility. He proposed that the IA be pushed to provide a more comprehensive assessment of whether material deviations had occurred. The committee agreed that the IA should be formally written to, with a comprehensive list of inconsistencies and content issues identified during the review, and a 24-hour deadline for response.

The Secretariat confirmed that the IA had previously been informed by email of revenue data inconsistencies but had not yet responded, and that no deadline had been included in that initial communication. The Chair directed that a formal comprehensive write-up be sent to the IA that day, incorporating all outstanding matters and stipulating a 24-hour deadline.

5.5 Requirement 2.3 — License Register (Assessed: Limited)

The Chair pointed the Meeting to Requirement 2.3, which had been assessed as limited due to incomplete, inconsistent, and hard-to-use license data, gaps in coordinates, unclear data on the status of expired or transferred licenses, and incomplete mining and petroleum registers.

On petroleum, the report noted that while petroleum license information is available on the Ministry website, specific licenses — including Uaru and Yellowtail production licenses — appeared to be missing and Demerara and Berbice appeared to have expired or terminated before the reported period. Mr. Michael Munroe confirmed, based on his checks of the Ministry website during the meeting that the Uaru production license and environmental permit were visible, but that the Yellowtail production license appeared to be absent. He agreed to follow up with the PS to clarify the status of all listed licenses and ensure they were published or their status documented.

The Chair also raised the question of a petroleum cadaster or data repository. Mr. Munroe confirmed that discussions were actively underway regarding the establishment of a petroleum data repository, and that a concrete timeline would be sought from the relevant official. The Chair undertook to follow up on this matter directly. with the to relieve the Secretariat of one item from its already substantia

Mr. Vogt noted that the Ministry had historically been forthcoming in publishing petroleum agreements and production licenses, and that any gaps were likely oversights or website architecture issues rather than a reluctance to disclose. He suggested the Ministry's petroleum directory might benefit from improved navigation and clearer categorization of document types.

Civil Society member Mr. Balraj Budwah was requested to review page 27 of the report and submit comments by close of day, particularly in relation to civil society perspectives on licensing data.

5.6 Requirement 2.4 — Contract Disclosure (Assessed: Good)

Requirement 2.4 received an assessment of good, reflecting progress in petroleum contract publication since the previous validation. However, the committee noted that gaps remained on whether all active contracts were disclosed, and that the EITI report did not provide a comprehensive list of active contracts.

Industry member Mr. Vogt noted some confusion in the report's treatment of Canje and Yellowtail, pointing out that Canje is an exploration license and Yellowtail a production license — two entirely different instruments that should not be conflated. This was identified as an error in the Oslo Secretariat's drafting that should be corrected in the MSG's response.

The Consultant emphasized that the score under 2.4 could potentially be improved from good to very good through relatively straightforward corrective actions — namely, publishing an overview of which contracts are publicly available and confirming whether any remain unpublished, including the legal or practical barriers where applicable. He noted that the information appeared to be largely available and that the issue lay primarily with the way the report was written rather than with substantive gaps in disclosure.

The Consultant also reiterated that the quality of the IA's report writing was a systemic concern across multiple requirements, noting that licenses and contracts were listed on the website but that the EITI report failed to clearly indicate which were active versus inactive for a given reporting period. He proposed that a formal, documented communication be sent from the MSG to the IA outlining these concerns and setting expectations for the 2024 report.

5.7 Requirement 2.5 — Beneficial Ownership (Assessed: Limited)

The Chair directed the meeting attention to Requirement 2.5, which had been assessed as limited. The report acknowledged that Guyana had established a framework for beneficial ownership (BO) disclosure through the DCRA registry and the 2024 scoping study, but noted limited evidence documenting the MSG's formal decision on the BO definition and disclosure approach, despite the adoption of a 25% reporting threshold.

The Secretariat clarified that the MSG had formally adopted the 25% threshold and that this decision was recorded in the minutes of a previous meeting. However, this evidence may not have been shared with the Oslo team. The committee agreed that the Secretariat should provide the EITI Secretariat

with the relevant minutes as evidence of the formal MSG decision, which would directly address the "limited evidence" finding. The Consultant confirmed that this was a quick fix that could meaningfully improve the score.

The Committee further discussed gaps in BO disclosure coverage, noting that data had been collected only from material reporting companies rather than all companies applying for or holding extractive licenses. The committee agreed that the IA should be asked to clearly present the list of companies that provided BO data alongside the full universe of license holders, so that the gap could be transparently quantified.

It was emphasized that linking BO information to the GGMC licensing system was a long-term aspiration that would require significant digital system development and could not be achieved in the short term. The Meeting recommended that Guyana focus on clearly demonstrating compliance with the existing legal framework and present a phased monitoring plan for the progressive integration of BO data into digital systems, rather than attempting to meet the 10% threshold recommended by Oslo in the near term. The Consultant agreed, noting that Guyana was several years away from full integration given the existence of parallel systems.

The Chair also noted that the strategic recommendation to review BO information disclosed through stock exchange filings was a standard comment that appeared across most country validations and need not be treated as a priority action, given that it was an encouraged rather than required measure. Mr. Vogt further clarified the complexity of tracing BO through parent company structures from locally registered branch companies to publicly listed entities on international stock exchanges.

6. Homework and Preparation for Next Session

The Chair concluded the substantive review for the session and assigned collective homework to all participants. She requested that each attendee read through Section 3.1 — Extractive Sector Overview — prior to the following day's meeting, and come prepared with specific paragraph-level comments, so that the session could move efficiently without requiring a full read-through of the section.

The committee agreed that the Secretariat would extract Section 3.1 and upload it to a shared Google Drive document, with the link distributed via the WhatsApp group, to allow all participants to add comments directly in the document. This approach had previously been used successfully for the Validation Templates. The Chair also proposed that the majority of the following day's session be dedicated to reviewing the stakeholder engagement section (pages 15–22), which the Consultant had identified as the most substantive section, encompassing civil society engagement and MSG governance issues. The Chair proposed that Chair of the Communication Committee Ms Jennifer Persaud -Boodhoo — be invited to lead that portion of the session and requested the Secretariat to contact Jennifer to confirm her availability.

7. Adjournment

There being no further business, the Chair thanked all participants for their energy and commitment and adjourned the meeting at approximately 10:44 hrs. The next meeting was confirmed for Thursday, October 1, 2026, commencing at 09:00 hrs, to complete the review of Section 3.1 — Extractive Sector Overview — and to proceed with a detailed review of the stakeholder engagement section, to be led by Jennifer, chair of the communication committee.

8. Key Decisions / Actions

No.	Area	Decision / Action	By Whom
1	Req. 2.2 — Auction / Competitive Bidding Justification	Secretariat to check the 2023 EITI report for existing information on the justification for using competitive bidding / auctions in the award of licenses. If not already contained therein, Secretariat to follow up with GGMC and MNR for clarification.	Secretariat
2	Req. 2.2 — Small-Scale Miner List	Secretariat to request GGMC to provide a list of the 10,000+ small-scale miners (names only, to respect privacy) and publish it on the GGMC website, to be referenced in the MSG's response to Oslo.	Secretariat
3	Req. 2.2 — Definition of Small, Medium, and Large-Scale Miners	Secretariat to flag as a priority action item the need for GGMC to define, for EITI reporting purposes, the distinction between small-scale, medium-scale, and large-scale miners. A draft proposal to be prepared and presented to the PS, with the intention of bringing it back to the MSG at the October 7 meeting.	Secretariat / the Consultant
4	IA — Comprehensive Write-Up with Deadline	Secretariat to send a comprehensive written communication to the Independent Administrator (IA) today, incorporating all identified revenue data inconsistencies and content issues from the Validation Report review, with a 24-hour deadline for response.	Secretariat
5	Req. 2.3 — Petroleum License Status Clarification	Mr. Michael Munroe to follow up with the PS (MNR) regarding the missing or unclear status of petroleum licenses (including Uaru, Yellowtail, Demerara, and Barbis) and the need for a petroleum cadaster / data repository, including a concrete timeline.	Michael Munroe / Sonya Roopnauth
6	Req. 2.3 — Petroleum Data Repository	Ms. Roopnauth to follow up with the relevant official regarding progress and timeline for establishing a petroleum data repository, to relieve the Secretariat of this action item.	Sonya Roopnauth
7	Req. 2.3 — Civil Society Comments on Licensing Data	Mr. Balraj Budwah to review page 27 of the Validation Report and submit comments to the Secretariat by close of day, September 30, 2026.	Balraj Budwah
8	Req. 2.4 — Summary Data Table Verification	Secretariat to verify whether Oslo has access to the summary data table, which may already contain the list of active licenses, and to confirm accordingly.	Secretariat

9	Req. 2.4 — IA Report Quality Communication	Secretariat to prepare a formal written communication from the MSG to the IA, documenting concerns about the quality and clarity of the 2023 EITI report, with specific examples, and setting expectations for the 2024 report.	Secretariat
10	Req. 2.5 — Beneficial Ownership — MSG Decision Evidence	Secretariat to provide Oslo with the relevant MSG meeting minutes as formal evidence of the MSG's decision to adopt the 25% beneficial ownership reporting threshold, to address the finding of "limited evidence" of a formal MSG decision.	Secretariat
11	Req. 2.2 — FPIC — NTC Funding	Ms. Roopnauth to follow up with the PS of the Ministry of Indigenous Peoples' Affairs regarding additional budget allocation for NTC to conduct FPIC consultations in communities.	Sonya Roopnauth
12	NICIL Document — Follow-Up with RK Sharma	Ms. Roopnauth to follow up with RK Sharma regarding feedback on the NICIL document.	Sonya Roopnauth
13	Earmarking — Official Statement	Ms. Roopnauth to follow up with Minister Singh regarding the possibility of issuing an official statement clarifying that Guyana's public financial system does not earmark extractive revenues.	Sonya Roopnauth
14	Section 3.1 — Shared Document for Review	Secretariat to extract Section 3.1 of the Validation Report and upload it to a shared Google Drive document. The link to be shared with all participants via WhatsApp. All participants to review and add comments prior to the next session.	Secretariat / All Participants
15	Next Session — Jennifer to Lead Stakeholder Engagement Review	Secretariat to contact Jennifer (chair of the communication committee) to confirm her availability to lead the review of the stakeholder engagement section at the next session on October 1, 2026.	Secretariat / Sonya Roopnauth

Prepared by: GYEITI Secretariat
September 30, 2026

9. Attendance

Name	Organization / Role	Constituency	Gender	Present	Excused	Absent
Ms. Sonya Roopnauth	Chair, Workplan, Validation and TOR Committee	Government	Female	✓		
Mr. Joachim Vogt	ECO Atlantic	Industry	Male	✓		
Mr. Balraj Budwah	Civil Society Representative	Civil Society	Male	✓		
Mr. Rafeek Khan	MSG Member	Industry	Male	✓		
Mr. Michael Munroe	MSG Member	Government	Male	✓		
Mr. Derrick John	Civil Society Representative / NTC	Civil Society	Male	✓ (participated via chat)		
GYEITI Secretariat & Consultants						
Rajdai Jagarnauth (RJ)	GYEITI Secretariat — Observer	Observer	F	✓		
Johann Earle	GYEITI Secretariat — Observer	Observer	M	✓		
Sam Tokpah	Consultant — Observer	Observer	M	✓		
Ashantie Williams	GYEITI Secretariat — Observer	Observer	F	✓		
Renrick Ramgobin	GYEITI Secretariat — Observer	Observer	M	✓		

September 30, 2026

MINUTES OF THE 8TH MSG REVIEW MEETING OF THE DRAFT VALIDATION REPORT, HELD ON OCTOBER 1, 2026

VIRTUAL VIA ZOOM: 12:56 HRS – 15:17 HRS

Chair: MS. SONYA ROOPNAUTH, CHAIRPERSON OF THE WORKPLAN, VALIDATION AND TOR COMMITTEE

1. Call to Order and Opening Remarks

The meeting was called to order at approximately 12:56 hrs. by the GYEITI Secretariat. Ms. Sonya Roopnauth assumed the chair and confirmed that a quorum was present. Participants were welcomed and the meeting proceeded with a detailed review of Section 3.1 — Extractive Sector Overview — and stakeholder engagement sections of the Draft Validation Report.

Ms. Roopnauth noted that the primary objective of the session was to complete the review of Section 3.1 and address critical concerns regarding the stakeholder engagement assessment. She emphasized the importance of finalizing the MSG's response to the Validation Report by the October 16, 2026, deadline.

2. Members' Attendance

Members in attendance, virtually, are recorded in the attendance sheet. Attendees included representatives from government, industry, civil society, and the GYEITI Secretariat. A total of 11 participants joined during the session. Mr. Derrick John (civil society/NTC) participated remotely from his community. The meeting was conducted via Zoom with discussions focused on data accuracy, stakeholder engagement, and corrective actions.

3. Review of Section 3.1 — Extractive Sector Overview

The committee conducted a detailed review of Section 3.1 of the Draft Validation Report, focusing on data availability, reporting challenges, and accuracy of statements regarding the extractive sector in Guyana.

3.1 Data Availability and Exploration Data

Concerns about the accuracy of statements regarding exploration data and informal mining data. The group agreed that some points needed clarification or deletion due to confidentiality issues. Participants discussed the need for more specific information on data disaggregation across platforms and the status of mineral mapping exercises by MNR.

The Consultant provided insights on addressing informal mining data gaps, suggesting the use of third-party sources (such as IMF data) and the potential development of reconciliation processes similar to those implemented in other countries like Ghana.

3.2 Employment Data Sources and Local Content Act

The team discussed employment data sources for the extractive industry sector. It was explained that multiple sources exist, including Bureau of Statistics, companies, and GGMC, though GGMC's collection frequency is unclear. It was noted that previous validation concerns about outdated

employment data were as a result of data becoming available after the 2023 report was finalized, and this information could now be updated.

It was highlighted that Guyana has implemented a comprehensive Local Content Act since 2021 that requires detailed employment data collection and reporting from oil and gas companies, contradicting claims about outdated data in the extractive sector.

3.3 Large-Scale Mining Data Reporting

The group identified several problematic statements in the report that needed correction, particularly regarding mining data reporting. Joachim emphasized that inaccurate information would harm EITI implementation in Guyana. The discussion focused on clarifying that while large-scale mining data is available to government institutions, it may not be publicly disclosed. Sonya confirmed writing to the Permanent Secretary and GGMC about urgently needed definitions of small, medium, and large-scale mining.

3.4 Terminology Clarification and Project-Level Disclosure

The team discussed confusion around terminology in the EITI report, particularly regarding "remapping" versus "modernization" of mineral processes and the need for clearer definitions of project-level disclosure. They identified issues with how informal ASM (artisanal small-scale mining) exports are described in the report, noting that the language was unclear and potentially misleading, especially regarding export monitoring and informal versus formal reporting.

The group agreed that the MSG should take a more proactive approach to discussing these issues in future meetings, potentially bringing in experts and engaging with universities and communities to address the gaps identified in the report.

4. Stakeholder Engagement Assessment

The team reviewed comments on stakeholder engagement, with significant concerns raised about the accuracy and bias of statements in the Validation Report regarding civil society freedom of expression and representation in Guyana.

4.1 Freedom of Expression and Civil Society Representation: strong concerns were expressed about biased statements in the report regarding civil society freedom of expression and representation. Participants characterized the report's claims about freedom of expression and civil society as reckless and irresponsible. The group agreed that the stakeholder engagement section needed significant revision to accurately reflect the collaborative nature of the EITI process.

Members argued that the diversity and broadening of civil society representation should be viewed positively rather than critically. There was significant outrage about the report's characterization of civil society's engagement.

4.2 Outreach to Hinterland Communities

The group discussed challenges in reaching hinterland communities with EITI information. Derrick identified limited access to information as a key issue despite some internet connectivity being available through centralized ICT hubs. It was agreed that personal engagement and traditional consultation methods would be more effective than digital outreach, noting that civil society community members are not fully apprised about EITI standards.

The discussion concluded with agreement that outreach efforts be improved and be included in future work plans, acknowledging past challenges with executing planned community visits.

4.3 Context of Validation Report Bias

The Consultant explained that the report may have been influenced by a specific civil society group that previously supported the current validation lead. The team decided to develop a strong response to the report by October 16, 2026, and to organize capacity-building sessions for civil society representatives, including potentially flying in Civil Society member Mr. Derrick John from his village for dedicated review sessions.

5. 2024 EITI Report Timeline and Process

The team discussed the timeline for receiving the Independent Administrator's new schedule report, expected the following day. The Consultant explained that while the 2024 report could potentially be completed by December 31st, the 2025 report could be produced early in 2027 to avoid suspension, with some requirements able to be addressed in future reports.

The Chair emphasized the importance of including as much content as possible in the 2024–2025 reports due to the three-year public domain exposure and suggested receiving sections of the report in advance for earlier review. The Consultant advised that the MSG's review process should focus more on critical aspects like project-level definitions and beneficial ownership information rather than grammar and suggested requesting draft sections from the IA to enable more effective feedback.

The Consultant further clarified that while current outreach efforts wouldn't be included in the GY-EITI annual report by IA, they could be captured in the Secretariat's annual progress/activity report and validation report.

6. Adjournment

There being no further business, the Chair thanked all participants for their energy and commitment and adjourned the meeting at approximately 15:17 hrs. The next meeting was confirmed for the following day, October 2, 2026, commencing at 11:00 hrs., to be held in person (venue to be confirmed) with hybrid participation available, to continue the detailed review of the Validation Report and finalize the MSG's response to the Oslo Secretariat.

7. Key Decisions / Actions

The MSG made the following formal decisions and assigned action items during the meeting:

No.	Type	Area	Decision / Action	By Whom
D1	Decision	Validation Response	Develop a strongly-worded response to the Oslo Secretariat regarding the Validation Report, to be submitted by the October 16, 2026, deadline, requesting significant revision of the stakeholder engagement section so that it accurately reflects the collaborative nature of Guyana's EITI process and the diversity of civil society representation.	MSG / Secretariat

No.	Type	Area	Decision / Action	By Whom
D2	Decision	Meeting Format	Hold the following day's meeting (October 2, 2026) in person at a neutral venue (e.g., International Conference Centre) with hybrid participation capability, to facilitate more effective discussion and review of the Validation Report.	MSG
D3	Decision	Capacity Building	Organize capacity-building sessions for civil society representatives, including bringing Mr. Derrick John and potentially other civil society representatives from hinterland communities to Georgetown for dedicated review sessions of the Validation Report.	MSG / Secretariat
D4	Decision	MSG Review Focus	Future MSG review processes should focus primarily on critical substantive aspects such as project-level definitions, beneficial ownership information, and data accuracy, rather than grammatical or stylistic elements.	MSG
D5	Decision	2024 EITI Report Process	Request draft sections of the 2024 EITI report from the Independent Administrator (BDO) as they are completed, rather than waiting for the full report, to enable earlier and more effective review and feedback.	MSG / Secretariat
D6	Decision	Work Plan — Outreach & Capacity Building	Include capacity building and outreach programs for civil society, particularly the NTC, and for hinterland communities in the next MSG work plan, prioritizing personal engagement and traditional consultation methods over digital outreach alone.	MSG / Secretariat
D7	Decision	Expert Engagement	Take a more proactive approach in future meetings by bringing in experts and engaging with universities to address gaps identified in the EITI reporting process.	MSG
D8	Decision	EITI Board Engagement	Directly engage newly elected EITI Board members (through their respective constituencies) to present Guyana's views on the Validation Report and address concerns about its accuracy and bias.	MSG / Constituency Representatives
1	Action	EITI Board Engagement	Provide the names of the newly elected EITI Board members to Joachim and Rafeek for direct engagement and to present Guyana's views on the Validation Report.	Sam Tokpah
2	Action	Document Distribution	Ensure Shahrukh Hussain receives a copy of the Validation Report and confirm he has the correct document.	Secretariat
3	Action	Validation Report Review	Review the Validation Report and provide feedback with track changes to the Secretariat by close of business the following day.	Shahrukh Hussain

No.	Type	Area	Decision / Action	By Whom
4	Action	In-Person Meeting Arrangements	Confirm availability of a neutral venue (e.g., International Conference Centre) for the following day's in-person meeting and ensure hybrid participation capability.	Sonya Roopnauth / Secretariat
5	Action	Meeting Agenda	Work with the Secretariat to finalize and distribute the annotated agenda for the following day's meeting overnight.	Sonya Roopnauth / Secretariat
6	Action	Civil Society Outreach — NTC	Reach out to the Permanent Secretary of Amerindian Affairs to discuss funding and logistics for flying Derrick John (and potentially other civil society representatives) to Georgetown for a dedicated review session of the Validation Report.	Sonya Roopnauth
7	Action	Large-Scale Mining Data Sources	Confirm with the Minister of Finance and the GGMC Commissioner the publicly available sources for large-scale mining production and employment data, and provide this information to the Secretariat for the report.	Sonya Roopnauth
8	Action	Constituency Engagement	Discuss and consider writing to their respective constituency representatives on the new EITI Board to present Guyana's views on the Validation Report.	Joachim Vogt / Rafeek Khan
9	Action	Response to Oslo Secretariat	Draft a strongly-worded response to the Oslo Secretariat regarding the stakeholder engagement section of the Validation Report, incorporating links and references to demonstrate freedom of expression in Guyana.	Secretariat
10	Action	Capacity Building Work Plan	Draft the capacity-building and outreach component (civil society, particularly the NTC, and hinterland communities) for the next MSG work plan and submit it to the MSG for approval.	Secretariat
11	Action	Corrective Actions Clarification	Request clarification from the Oslo Secretariat on the specific corrective actions from the previous validation that are still outstanding.	Secretariat
12	Action	2024 Report Sections	Request from the IA (BDO) draft sections of the 2024 report for review as they are completed, rather than waiting for the full report.	Secretariat
13	Action	Ministry of Natural Resources Follow-up	Follow up with the Permanent Secretary of the Ministry of Natural Resources to (a) urgently obtain the definitions of small, medium, and large-scale mining, and (b) verify the status and correct terminology for the mineral mapping/remapping process.	Secretariat

Prepared by: GYEITI Secretariat

October 1, 2026

8. Attendance

Name	Organization / Role	Constituency	Gender	Present	Excused	Absent
Ms. Sonya Roopnauth	Chair, Workplan, Validation and TOR Committee / Ministry of Finance	Government	Female	✓		
Mr. Joachim Vogt	ECO Atlantic	Industry	Male	✓		
Mr. Rafeek Khan	MSG Member	Industry	Male	✓		
Mr. Derrick John	Civil Society Representative / NTC	Civil Society	Male	✓		
Ms. Onica	GYEITI Secretariat	GYEITI Staff	Female	✓		
Ms. Jennifer Persaud	MSG Member	Civil Society	Female			✓
Mr. Shahrukh Hussain	MSG Member	Government	Male	✓		
Ms. Teijvarti	MSG Member	Civil Society	Female	✓		
Ms. Madhavi Indarjeet	MSG Member	Civil Society	Female	✓		
Renrick Ramgobin	GYEITI Secretariat	Observer	Male	✓		
Ms. Rajdai Jagarnauth	GYEITI Secretariat	Observer	Female	✓		
Ms. Ashantie Williams	GYEITI Secretariat	Observer	Female	✓		
Sam Tokpah	Consultant — Observer	Observer	Male	✓		

MINUTES OF THE 9TH MSG REVIEW MEETING OF THE DRAFT VALIDATION REPORT, HELD ON OCTOBER 2, 2026

VIRTUAL VIA ZOOM AND IN-PERSON AT MINISTRY OF NATURAL RESOURCES: 15:02 HRS – 18:41 HRS

Chair: MS. SONYA ROOPNAUTH, CHAIRPERSON OF THE WORKPLAN, VALIDATION AND TOR COMMITTEE

1. Call to Order and Opening Remarks

The meeting was called to order at approximately 15:02 hrs. Participants were welcomed and the meeting proceeded with a comprehensive review of the EITI scoping report and several critical classification and reporting issues. The primary objective of the session was to address data discrepancies identified by the Independent Administrator (IA), review classification proposals for NICIL and GGB, discuss the timeline for the 2024-2025 reporting process, plan civil society sensitization sessions, and address outstanding validation concerns regarding GGMC payment obligations to Amerindian village councils. The meeting was conducted in hybrid format, with some participants joining virtually via Zoom and others present in person at the Ministry of Natural Resources building.

2. Members' Attendance

Members in attendance, both virtually and in person, included representatives from the GY EITI Secretariat, the Independent Administrator team (David Quinn and Rakesh Latchana), technical advisors (Sam Tokpah), industry representatives (Joachim Vogt and Rafeek Khan), and civil society (Derrick John). A total of 6 participants were recorded during the session. Mr. Derrick John joined the meeting remotely initially and later attended in person for document review. The meeting was facilitated by the GYEITI Secretariat with discussions focused on data accuracy, reporting timelines, entity classification, and validation response preparation.

3. Review of GGMC Financial Data Discrepancies

The IA Consultant, Rakesh Latchana presented findings from the revised data submitted by the Guyana Geology and Mines Commission (GGMC). While the variance had narrowed compared to earlier submissions, significant discrepancies remained between GGMC's financial statements and their EITI disclosures. Specifically, a gap of approximately GYD 650 million was identified between GGMC's audited financial statements showing GYD 9.1 billion in income and the revised schedule provided to the IA showing GYD 8.5 billion. Additionally, a discrepancy of approximately GYD 250 million existed between the environmental deposits shown in the schedule at GYD 142 million and the increase in accounts payable reflected in the financial statement notes at GYD 393 million. It was pointed out that a previously identified GYD 60 million difference between the income statement and notes to financial statements also remained unresolved, as no revised financial statements were submitted by GGMC.

Consultant, Sam Tokpah provided technical context, noting that not all of GGMC's revenue originates from extractive companies. Some revenue sources, such as court settlements, fall outside the scope of EITI disclosure, which could partially account for the gap between total income and EITI-reported receipts. He further explained that while the data had been cleaned up and categorized more

appropriately, the variance remained due to unclear distinctions between EITI-relevant and other revenue sources. He emphasized that GGMC would need to provide a detailed explanation of the differences between extractive company payments and total income, including specific breakdowns of non-extractive revenue sources.

The IA Consultant team member, David Quinn clarified that what is required from GGMC is not a detailed line-by-line reconciliation, but rather a credible explanation of why the declared receipts differ from the income in the audited accounts, to provide assurance that the EITI figures are properly extracted. He explained that where there is a difference between the revenue in the accounts and the receipts declared for EITI, some sort of explanation is needed that there were types of revenue which were excluded, so that assurance could be provided that the numbers being given for receipts actually were reflected in the accounts.

Following discussion, the group agreed to proceed with the current data while pursuing a parallel reconciliation with GGMC on the identified variances. It was noted that this discrepancy does not affect the scoping of extractive industry payment flows, which is limited to the mining sector. The Secretariat was tasked with following up with GGMC to clarify the GYD 650 million income statement and GYD 250 million environmental bond discrepancies. The IA Consultant agreed to share relevant documentation to facilitate the follow-up.

4. 2024-2025 Reporting Process Timeline

The team discussed the tight timeline for publishing the report by December 31st. The IA Consultant indicated that data request templates had not yet been sent to companies and agencies, creating downstream delays. He explained that if templates are sent out the following week with a two-week response window, reconciliation would not begin until approximately October 19th, leaving roughly 4 weeks or less for drafting and finalizing the report. The IA Consultant emphasized that time is not on their side, having hoped for reconciliation by Monday, but now facing a significantly reduced timeline.

The Independent Administrator proposed a staggered feedback approach, allowing sections of the report to be reviewed and returned incrementally rather than waiting for the full document. This approach was agreed upon by the committee as a means to improve efficiency and help condense the timeline. The IA Consultant committed to sending a revised scoping document with a proposed timeline to the Secretariat by 2:00 p.m. on the day of the meeting, with feedback expected by Tuesday or Wednesday of the following week, after which data requests to companies and agencies would begin.

The possibility of splitting the reporting period was raised, with the IA Consultant suggesting that given the timeline constraints, the 2024 report could be published by the year-end deadline, with the 2025 report to follow early in the new year, if possible. It was noted that this proposal requires an MSG decision. The Secretariat emphasized the importance of including as much content as possible in the 2024-2025 reports and requested that the IA provide sectional submission dates to allow for advance scheduling of review meetings.

The IA Team member David Quinn noted that the focus had been on the selection of entities due to difficulties encountered, but that the scoping report also dealt with all other matters requiring MSG consideration, including non-financial data. He indicated that proposals in the existing report were

unchanged and that MSG members could begin reading and taking a view on those sections already, without needing to wait for anything further.

The committee also highlighted concerns about consistency across report sections, with the validation team having previously identified internal discrepancies. The IA acknowledged that time pressure contributes to this issue and committed to careful cross-checking, noting that they had attempted to use AI tools for consistency verification in the previous report but that some discrepancies were still missed.

5. Civil Society Sensitization Sessions Planning

The Secretariat and Consultant Sam Tokpah discussed the organization of civil society engagement sessions ahead of the validation exercise. Sessions were planned for Georgetown (covering coastal regions), Bartica, and Port Kaituma (covering hinterland regions). Sam expressed concern about the tight timeline and suggested the MSG consider requesting an extension to incorporate findings from the planned civil society meeting scheduled for the 19th. He indicated he was approximately 65-70% confident about the outcome of the October 19th Civil Society meeting, noting that Oslo had brought in someone from Trinidad and Tobago familiar with the EITI process to provide an additional level of intervention and support.

The Consultant availability and presence in Guyana were discussed. Dates proposed were October 16th

with a tentative departure on the 18th or 20th, depending on logistics for reaching hinterland communities. The Secretariat committed to coordinating logistics with the CO Chair of Civil Society Mr. Derrick John and relevant stakeholders, including securing Ministry of Natural Resources support for hinterland travel arrangements. It was agreed that the sessions would target Georgetown and two hinterland regions (Bartica and Port Kaituma). Additional locations to be covered in a subsequent travel dates and coordination with the National Coordinator by end of day or early the following morning was agreed upon to allow for advance arrangement of logistics and accommodations for participants.

6. NICIL Classification Proposal Review

The committee conducted a detailed review of the draft proposal for classifying NICIL for EITI reporting purposes. The Secretariat presented a revised document that had been edited by the Consultant. The inclusion relates to a comparison table distinguishing between state-owned enterprises and holding companies. Several key editorial and substantive changes were discussed and agreed upon during the review.

First, the document was revised to describe NICIL as a wholly state-owned holding company rather than simply a state-owned enterprise. An explanatory note was added to the comparison table clarifying that the criteria listed are generic qualifications for SOEs and holding companies in general and do not directly apply to NICIL's specific situation. This distinction was important to avoid confusion about whether the table was describing NICIL itself or providing general definitional guidance for the MSG.

The committee confirmed that NICIL does not directly own or operate extractive assets. Rather, it holds minority shareholdings in three companies engaged in the extractive sector and receives

dividends rather than extractive revenues. The document was updated to reflect that NICIL is a government-owned holding and asset management company with interests in various sectors and companies, including minority holdings in three companies engaged in the extractive sector, but that it does not directly own or operate any mines, oil blocks, or other extractive assets.

All acronyms, including SOE and NICIL, were to be spelled out in full upon first use throughout the document. Additionally, the committee agreed that a clear MSG decision statement should be included at the end of the document, framing the recommendation explicitly so that MSG members understand precisely what they are being asked to decide. This approach was endorsed as a best practice for future committee papers, as it would direct the MSG discussion more efficiently and ensure clear documentation of decisions.

The Secretariat was tasked with updating the NICIL classification document with all agreed changes and including a clear decision statement for MSG consideration at the October 7th meeting. The committee expressed agreement with the proposed classification of NICIL as a holding company rather than a state-owned enterprise for GYEITI reporting purposes.

7. 8. GGB Classification for EITI Reporting

The committee reviewed the historical classification of the Guyana Gold Board (GGB) for GYEITI reporting purposes. It was noted that GGB has consistently been referred to as a government agency in GYEITI reports, with the only state-owned enterprise reference appearing in data collection templates rather than in the body of the official reports. The 2018 Foundation Report's associated data collection templates referred to GGB as an SOE, while the 2018 report itself did not expressly classify GGB as an SOE. The FY2023 reports treated GGB as a government agency.

GGB is established as a corporate body under the GGB Act and performs statutory functions related to purchasing and regulating the export of gold on behalf of the government. Importantly, GGB does not own any extractive rights or operate directly in the extractive sector. It functions primarily as a buyer and regulator of gold exports. Sam noted that the Independent Administrator had historically collected and reported data without formally defining GGB's status, and that this classification decision would provide clarity going forward and ensure consistency in future reporting.

Following consideration of GGB's establishment, statutory functions under the Act, and operational role, the committee agreed to classify GGB as a government agency and not as a state-owned enterprise for GYEITI reporting purposes, to be applied consistently in all future EITI reporting. The Secretariat was tasked with following up with the Auditor General to confirm that GGB's classification is consistent with how it appears in Audit Office reports, to ensure coherence across government reporting frameworks. Sam was also asked to send any additional comments on the GGB classification document to the Secretariat for incorporation before the MSG meeting.

8. Project-Level Reporting Definition

The Consultant indicated that once responses are received from both GRA and the Ministry, it should be quite straightforward to prepare the project-level reporting paper, as these are fundamental questions that should not require extensive deliberation. He estimated that if responses could be obtained by Monday or Tuesday of the following week, the paper could be finalized and circulated within an hour of receiving the clarifications.

The Secretariat was tasked with sending the four basic questions on project definition to GRA and the Commissioner General immediately, and preparing and circulating the project-level reporting paper once responses from both agencies are received. The goal was to have responses before the end of the committee's work to enable finalization of the documentation for MSG consideration.

9. GGMC Payment Obligations to Amerindian Village Councils

The team reviewed the status of GGMC's obligations under the Amerindian Act 2006, which requires 20% of funds from mining activities on village lands to be transferred to a fund designated by the Minister for the benefit of Amerindian villages. The Act also provides that village councils provide financial reports to the Ministry of Amerindian Affairs as well as to the region, and that financial reports be read quarterly at minimum during village meetings. Through the Act, residents have recourse to the Minister to request audits and make complaints of financial mismanagement for consideration and intervention.

The Ministry of Amerindian Affairs had provided an email response outlining the legal framework and oversight mechanisms, including National Toshaos Council oversight, village general meetings, and audit-on-request provisions. The response noted that the Government of Guyana has ensured training for good financial management is in place, and the NTC remains a statutory oversight body to provide support to villages complementary to the Ministry. The response also indicated that based on the Act requirements and policy decisions, payments from companies to village councils could qualify as both direct subnational payments as well as social expenditure, as payments are required by law in addition to negotiated social expenditure.

The Consultant noted that while the email was informative about process and legal framework, it did not address the core validation concern: that GGMC has not fully paid the amounts owed, with an estimated outstanding balance in the range of GYD 4-49 million, and that no clear reconciliation of what was received versus what was paid to villages has been provided. He emphasized that the validation issue centers on accountability around what was received and what was paid to the villages, and that in the absence of making the payments or providing a clear accounting, the response would not adequately address the validator's concerns.

Civil Society Member, Mr. Derrick John provided additional context on the village-level accounting processes, explaining that at general meetings, treasurers are required to provide financial reports on income and expenditure, supported by invoices and receipts that are open for council examination. He also explained the process by which residents can trigger ministerial investigation if they suspect financial mismanagement, noting that while this does occur, it is not widespread and that investigations are conducted to verify whether concerns are genuine or politically motivated.

The group agreed that the Ministry of Amerindian Affairs response, as submitted, would not be sufficient for validation purposes and that more granular engagement with GGMC is needed. Information from GGMC should provide a clear accounting of amounts received, amounts paid to village councils, and the status of any pending audit process.

Additionally, the Secretariat was to ensure that the MSG decision on the treatment of these payments is documented and posted on the GYEITI website.

11. Decisions and Action Items

The committee made several key decisions during the meeting.

First, it was agreed to proceed with the current GGMC data while pursuing parallel reconciliation on the GYD 650 million and GYD 250 million discrepancies.

Second, a staggered section-by-section feedback approach would be adopted for the scoping report to compress the timeline and enable earlier review of individual sections.

Third, GGB would be classified as a government agency (not an SOE) for all GYEITI reporting purposes going forward.

Fourth, the NICIL classification document would be updated with agreed changes and a clear MSG decision statement before the October 7th MSG meeting.

Fifth, civil society sensitization sessions would be held in Georgetown, Bartica, and Port Kaituma, targeting the week of October 16th, subject to Sam's travel confirmation.

Action items were assigned as follows.

IA Consultant would provide the revised scoping document and proposed timeline to the Secretariat by 2:00 p.m. on the same day, share GGMC discrepancy documentation with the Secretariat immediately after the meeting to facilitate follow-up, and provide feedback on the revised scoping document by Tuesday or Wednesday of the following week. The IA would send out data requests to companies and agencies immediately after MSG approval.

Consultant ah would confirm travel dates (arrival on the 15th, departure on the 18th or 20th) with the National Coordinator and coordinate logistics for civil society sessions by end of day or early the next morning. He would also send comments on the GGB classification document to the Secretariat.

The GY EITI Secretariat was tasked with multiple follow-up actions: following up with GGMC to clarify the GYD 650 million income statement and GYD 250 million environmental bond discrepancies; sending the four basic questions on project definition to GRA and the Commissioner General immediately; updating the NICIL classification document with agreed changes and including a clear MSG decision statement before the October 7th MSG meeting; preparing and circulating the project-level reporting paper once responses from GRA and the Ministry are received; ensuring that the decision on treatment of payments to Amerindian villages is documented and posted on the GYEITI website; and following up with the Auditor General regarding the classification of GGB for EITI reporting.

12. Adjournment

There being no further business, the meeting was adjourned at approximately 18:41 hrs. The next major milestone was confirmed as the MSG meeting scheduled for October 7th to formally consider and approve the scoping report, NICIL classification, GGB classification, and other outstanding decisions. The Secretariat would circulate the revised scoping document received from the IA Consultant to all relevant stakeholders for review and feedback by Tuesday or Wednesday of the following week. Civil society sensitization sessions targeting Georgetown, Bartica, and Port Kaituma would be held the week of October 16th, pending logistics confirmation. Data requests to companies and government agencies would be sent out by Friday following MSG approval, with a two-week response window anticipated. The parallel GGMC reconciliation process would continue throughout the reporting period, with the goal of eliminating remaining discrepancies prior to the final report.

Key Decisions / Actions

No.	Area	Decision / Action	By Whom
1	GGMC Data Discrepancies — Parallel Reconciliation	Proceed with current GGMC data while pursuing parallel reconciliation on the GYD 650 million income statement variance and GYD 250 million environmental bond discrepancy. Follow up with GGMC to obtain a credible explanation of the differences between extractive company payments and total income, including breakdowns of non-extractive revenue sources. Rakesh to share relevant documentation to facilitate follow-up.	Secretariat / Rakesh Latchana
2	2024–2025 Reporting Timeline — Scoping Document & Feedback	Send revised scoping document with proposed timeline to the Secretariat by 2:00 p.m. (October 2, 2026). Secretariat to provide feedback by Tuesday or Wednesday of the following week, after which data requests to companies and agencies will begin.	Rakesh Latchana / Secretariat
3	2024–2025 Reporting — Staggered Review Approach	Adopt a staggered section-by-section feedback approach for the scoping report to compress the timeline and enable earlier review of individual sections rather than waiting for the full document.	Independent Administrator / Secretariat
4	2024–2025 Reporting — Data Requests to Companies & Agencies	Send out data request templates to companies and government agencies immediately following MSG approval of the scoping report, with a two-week response window anticipated.	Rakesh Latchana / David Quinn
5	Civil Society Sessions — Travel	Confirm travel dates (arrival October 15, departure October 18 or 20) with Ms. Daga and coordinate logistics for civil society sensitization sessions in	Sam Tokpah / Secretariat

	& Logistics Confirmation	Georgetown, Bartica, and Hotai Juma by end of day October 2 or early October 3, 2026.	
6	Civil Society Sessions — MNR & Stakeholder Coordination	Coordinate logistics with Mr. Derrick John and the Ministry of Natural Resources to secure support for hinterland travel arrangements for civil society sensitization sessions.	Secretariat
7	NICIL Classification — Updated MSG Paper	Update the NICIL classification document with all agreed changes (describing NICIL as a wholly state-owned holding company, adding explanatory note to comparison table, spelling out all acronyms in full on first use) and include a clear MSG decision statement for consideration at the October 7, 2026, MSG meeting.	Secretariat
8	GGB Classification — Auditor General Confirmation	Follow up with the Auditor General to confirm that GGB's classification as a government agency is consistent with how it appears in Audit Office reports, to ensure coherence across government reporting frameworks. Sam to send any additional comments on the GGB classification document to the Secretariat.	Secretariat / Sam Tokpah
9	Project-Level Reporting — GRA & Ministry Questions	Send the four basic questions on project definition to GRA and the Commissioner General immediately. Prepare and circulate the project-level reporting paper once responses from both agencies are received, ahead of the October 7, 2026, MSG meeting.	Secretariat
10	GGMC Payment Obligations — Amerindian Village Councils	Follow up with GGMC to obtain a clear accounting of amounts received under the Amerindian Act 2006 (20% of mining funds), amounts paid to village councils, and the status of any pending audit process. Ensure the MSG decision on treatment of these payments is documented and posted on the GYEITI website.	Secretariat
11	MSG Meeting — October 7, 2026	Circulate revised scoping document, NICIL classification paper, GGB classification decision, and project-level reporting paper to all MSG members ahead of the October 7, 2026, MSG meeting for formal consideration and approval.	Secretariat

Prepared by: GYEITI Secretariat

October 2, 2026

13. Attendance

Name	Organization / Role	Constituency	Gender	Present	Excused
Ms. Sonya Roopnauth	Chair, Workplan, Validation and TOR Committee / Ministry of Finance	Government-In person	Female	✓	
Mr. Joachim Vogt	ECO Atlantic	Industry-In person	Male	✓	
Mr. Rafeek Khan	MSG Member	Industry-In person	Male	✓	
Mr. Derrick John	Civil Society Representative / NTC	Civil Society-Online/In person	Male	✓	
Ms. Onica	GYEITI Secretariat	GYEITI Staff-In person	Female	✓	
Mr. Shahrukh Hussain	MSG Member	Government-In person	Male	✓	
Renrick Ramgobin	GYEITI Secretariat	Observer-In person	Male	✓	
Ms. Rajdai Jagarnauth	GYEITI Secretariat	Observer-In person	Female	✓	
Ms. Ashantie Williams	GYEITI Secretariat	Observer-In person	Female	✓	
Sam Tokpah	Consultant — Observer	Observer-Online	Male	✓	

10/02/2026

MINUTES OF THE 10TH MSG REVIEW MEETING OF THE DRAFT VALIDATION REPORT, HELD ON OCTOBER 5, 2026

VIRTUAL VIA ZOOM: 9:00 HRS – 10:30 HRS

Chair: MS. SONYA ROOPNAUTH, CHAIRPERSON OF THE WORKPLAN, VALIDATION AND TOR COMMITTEE

1. Call to Order and Opening Remarks

The meeting was called to order at approximately 13:01 hrs. by the GY EITI Secretariat. Ms. Sonya Roopnauth assumed the chair and confirmed that a quorum was present. The Secretariat apologized for the late start, noting that housekeeping activities had delayed commencement.

At the opening of the session, Mr. Joachim Vogt raised an important administrative matter regarding meeting invitations. He emphasized the need to transition to a proper Outlook calendar invitation system to avoid confusion about meeting settings, agenda changes, and member responses. This recommendation was fully endorsed by Mr. Persaud, Teijvarti. The Secretariat committed to developing a Standard Operating Procedure (SOP) for this purpose and briefing all relevant staff upon returning to full office capacity. Mr. Vogt indicated he would bring this matter to the full MSG to ensure systematic implementation going forward.

The Chair confirmed the afternoon schedule, noting that a session was planned for 1:30 PM later that day. Several members confirmed hard stops at 10:00 AM (14:00 hrs), including Mr. Vogt and Mr. Persaud, Teijvarti.

The Secretariat noted that the committee was awaiting a civil society representative to join the meeting. The Chair confirmed that a quorum was present and proposed to begin with the document on the definition of small, medium, and large-scale mining, which had been circulated by Mr. Sam Tokpah that morning, followed by continuation of the Validation Report review.

2. Members' Attendance

Members in attendance, virtually, included representatives from government, industry, civil society, and the GY EITI Secretariat. A total of 11 participants joined at various points during the meeting. Members present included:

Ms. Sonya Roopnauth (Guyana Ministry of Finance, Chair); Mr. Renrick Ramgobin (GY EITI Secretariat); Mr. Persaud, Teijvarti (MSG Member); Mr. Joachim Vogt (MSG Member); Mr. Shahrukh Hussain (MSG Member, Guyana); Mr. Anand Gohil (CNOOC, Industry); Mr. Rafeek Khan (MSG Member, Industry); Mr. Sam Tokpah (EITI International Secretariat / Facilitator); Mr. Balraj Budwah (Civil Society); and Ms. Onica (GY EITI Secretariat).

Apologies were noted from Mr. Derrick John (traveling), Ms. Madhavi, Mr. Shane Cornelius, and Ms. Debbie, who were unable to join despite individual WhatsApp outreach by the Secretariat.3. Announcements

The Secretariat confirmed that the document on the definition of small, medium, and large-scale mining had been circulated that morning and was ready for presentation and discussion. The Chair noted that the committee would begin with this document before proceeding to the Validation Report review, picking up from where the previous session had concluded.

4. Review Process — Small, Medium, and Large-Scale Mining Definition Document

4.1 Presentation by Consultant Sam Tokpah presented a document developed in collaboration with GGMC proposing a practical categorization of mining licenses for EITI reporting purposes. He explained that the document had been developed to address a significant practical challenge: there are currently over 12,000 mining licenses across small, medium, and large-scale operations in Guyana, making individual reporting and reconciliation impractical for the vast majority of license holders.

The proposal sets a threshold of 250 ounces of gold production to distinguish small-scale miners from medium and large-scale operators. Specifically, the definition references mining operations where an excavator processes a continuous amount over a 24-hour period yielding 250 ounces or less. Mining operations falling below this threshold would be reported as an aggregate amount, removing the need for individual reconciliation of each small-scale miner's data.

The Consultant explained that this approach would reduce the number of entities requiring individual data submission from over 12,000 to approximately 200 companies. According to calculations provided by GGMC, these 200 companies collectively account for approximately 85% of total mining revenue. The remaining 15% of revenue is generated by the approximately 12,000 small-scale miners, making it impractical to require individualized reporting from this group. By setting this threshold, the Independent Administrator (IA) would focus materiality assessments on the 200 medium and large-scale entities, with the top 10 to 15 companies likely to be selected for individualized reporting templates.

4.2 Discussion and Clarifications

The presentation prompted several important questions and clarifications from committee members as follow: -

- the phrase "250 ounces" as a standalone figure was ambiguous and required a clear time-bound reference to be meaningful. It was pointed out that the threshold must specify a rate — whether per day, month, or per cubic meter of material processed. The definition as drafted in the document did reference "a continuous amount over a 24-hour period," it was emphasized that this language needed to be tightened and made explicit to avoid misinterpretation.
- the scope of the definition: she asked whether the 250-ounce threshold applied to gold mining only, or to all mining activities. It was noted that Guyana's extractive sector includes not only gold, but also bauxite, diamonds, sand, and stone (quarry) mining. It was clarified by the consultant that the definition was intended to apply to gold mining only, as the bulk of the reporting challenge exists within the gold sector and further that the 250-ounce measure would not be applicable to diamonds (which are measured in carats) or to other mineral categories.

The Chair emphasized that this limitation must be explicitly stated in the document to avoid confusion and to ensure clarity for future readers and reporting cycles. She noted that bauxite mining, while currently smaller in scale compared to historical levels, is expected to grow significantly, and that the document should clearly articulate that this definition is gold-specific and does not extend to other extractive activities.

The Chair further requested the opportunity to review the underlying data and definition with GGMC to ensure consistency with Ministry of Finance reporting on small and medium-scale mining. She indicated that when the Ministry of Finance discusses mining in budget speeches or mid-year reports, it is essential that the definitions and categories used are aligned across agencies. She committed to having this discussion with GGMC within 24 hours to avoid delaying the committee's work.

The Chair also directed that the document be formally obtained from GGMC with the Commissioner's signature, to ensure that the Secretariat's records reflect an official GGMC-endorsed position. Mr. Tokpah confirmed that the document had been sent from GGMC to the Permanent Secretary (PS) of the Ministry of Natural Resources, and that the PS had forwarded it to the Secretariat. The Chair requested that this original communication be circulated to all MSG members for reference and transparency.

4.3 Decisions and Way Forward

Following discussion, the committee unanimously agreed on the following course of action: Consultant Sam Tokpah was requested to revise the document into a clear decision paper format, incorporating a formal recommendation for MSG adoption. The revised document should include explicit language clarifying that the definition applies to gold mining only, a tightened time-bound reference for the 250-ounce threshold, and a clear recommendation section outlining what the MSG is being asked to decide.

Mr. Joachim Vogt raised an important procedural point. He noted that while round-robin decision-making via email is efficient, it carries a psychological effect where members may align their responses based on what others have already said, reducing the quality of independent input. He argued that decisions of this significance are better made through open MSG discussion, where questions can be asked, clarifications sought, and consensus reached through dialogue. He recommended that the decision be presented at the upcoming MSG meeting on October 7, 2026, rather than through a round-robin process. The Chair agreed with this approach, and the committee confirmed that the decision paper would be tabled at the October 7 MSG meeting.

The Secretariat was directed to circulate the original GGMC communication (received via the PS) to all committee and MSG members for reference and to prepare the revised decision paper for presentation on October 7.

All members present — Mr. Anand Gohil (CNOOC), Mr. Balraj Budwah (Civil Society), Mr. Persaud, Teijvarti, Mr. Rafeek Khan, Mr. Shahrukh Hussain, 5. Review Process — EITI Validation Report Key Recommendations

The committee proceeded to review the Key Recommendations section of the EITI Validation Report, beginning at page 6 and aiming to progress through page 14 (Corrective Action and Strategic Recommendations). The Chair noted that the committee had approximately 25 minutes remaining before members' hard stops, and that the goal was to complete as much of the Key Recommendations section as possible. She emphasized that these sections summarized findings already reviewed in detail, and that the committee should therefore be able to move through them relatively quickly.

5.1 Strengthen EITI as a Platform for Evidence-Based Public Debate

The first recommendation urged that the MSG's annual work should be grounded in documented consultation with government, industry, and civil society, and that communication strategies should incentivize public use of EITI data.

Mr. Joachim Vogt immediately raised a point regarding the recommendation's reference to "including indigenous peoples." He noted that this language implied that indigenous peoples were not currently represented or engaged, which is factually incorrect. The Chair of the National Toshaos Council (NTC) is a member of the MSG, and the NTC represents Amerindian communities across Guyana. The committee agreed that the language should be revised to reflect that the MSG has already sharpened its focus and included the NTC, and that a reference to the NTC's composition and mandate should be included as supporting evidence. Mr. Persaud, Teijvarti suggested including a section of the Amerindian Act that describes the NTC's representative structure.

The Chair noted that the recommendation also called for communication strategies to incentivize public use of EITI data. She confirmed that EITI has been referenced in budget speeches by the Ministry of Finance and is included in the current administration's manifesto. She recalled that these references had been documented in the template submission prepared earlier in the validation process. The Consultant confirmed that this information had been included and could be reinforced in the MSG's response. The Chair requested that the Secretariat flag this for the PS of MNR to confirm whether EITI data is also referenced in other reports, and asked MSG member Mr. Rafeek Khan to check whether EITI data appears in the Guyana Revenue Authority (GRA) annual report in the context of licensing disclosures.

The recommendation also included language about providing "credible neutral information in a polarized public environment." The Chair objected to the use of the word "polarized," noting that it carries a negative connotation and suggests that the public discourse in Guyana is divided and non-collaborative. She questioned whether this characterization was fair or evidence-based, and requested that the term be deleted. The Meeting agreed noting that reports should contain constructive criticism that encourages progress, not language that undermines hope for an evolving situation. The Consultant h acknowledged that there is an ongoing debate within EITI about whether Validation should be punitive or corrective in tone, and agreed that the MSG's pushback on this language could help shift the broader discourse toward a more corrective approach.

The final sentence of the first bullet stated: "Balanced support from the National Secretariat to all constituencies should underpin this strategy." The Chair questioned whether there was any evidence of imbalanced support, noting that she was not aware of any instance where the Secretariat had provided imbalanced support to different constituencies. She suggested that the word "continue" should be inserted (i.e., "should continue to underpin"), unless there was specific evidence of imbalance that needed to be addressed.

The Consultant explained that the issue related to past instances where the MSG had made decisions — such as conducting outreach at the University of Guyana — and the Secretariat had postponed or not implemented those decisions. He clarified that the concern was not about the Secretariat favoring one constituency over another in day-to-day operations, but rather about instances where the Secretariat, as an arm of the champion ministry, had overridden MSG implementation decisions. He

emphasized the distinction between administrative decisions (which fall within the ministry's purview) and EITI implementation decisions (which must follow MSG direction).

Mr. Vogt asked how this balance is managed in practice, given that the champion ministry houses the Secretariat and provides resources. The Consultant explained that in most EITI implementing countries (all but three), the Secretariat is housed within a government agency. The expectation is that the Secretariat takes administrative and HR decisions within the ministry's purview, but that EITI policy and implementation work — such as the work plan and outreach activities — must follow MSG direction. The committee agreed that the language in the report, while somewhat general, reflected a real concern and should remain, with the understanding that the MSG's response would clarify the roles and responsibilities of the Secretariat vis-à-vis the MSG.

5.2 Ensure Balanced and Meaningful Multi-Stakeholder Oversight

The second recommendation focused on ensuring balanced and meaningful stakeholder oversight of EITI implementation, with particular emphasis on civil society participation.

The Chair noted that the entire paragraph appeared to focus exclusively on civil society, and suggested that if the recommendation is about "balanced" oversight, it should acknowledge all three constituencies. She proposed adding a sentence to recognize that industry and government constituencies have been working consistently and effectively, while civil society challenges are being addressed. She drafted suggested language and shared it in the meeting chat: "Both the industry and government constituencies have demonstrated active participation in the MSG as evidenced by engagement records of the GY EITI Secretariat and the ongoing progress of the implementation of the EITI Standard."

The Consultant further explained that the Validation team's focus on civil society in this section reflected the feedback they had received during consultations — the "burning issue" identified was with civil society participation, not with the other two constituencies. He noted that the report highlights where the challenge exists, rather than providing a balanced assessment of all three groups. The committee agreed that the MSG's response should include language acknowledging the effective participation of industry and government, to provide context and balance.

Mr. Joachim Vogt raised a concern about the phrase "designed to build trust" in the third line of the paragraph. He noted that this language appeared to have been copied from another country's validation report, and that it did not reflect the reality in Guyana, where trust has existed between MSG members from the inception of GY EITI. He argued that the language should be revised to reflect Guyana's context, and suggested replacing "build trust" with language focused on fostering further development or strengthening collaboration. The committee agreed to flag this language for revision.

The recommendation also included a reference to "mitigating risks of self-censure and fear of reprisal." The Chair objected strongly to the phrase "fear of reprisal," stating that it sounded as though Guyana were operating under a dictatorship. She questioned what evidence existed to support such a characterization, and whether any civil society representative had actually expressed fear of reprisal during the Validation consultations.

The Consultant explained that allegations had been made during the Validation process, including claims by a civil society organization that their offices had been broken into multiple times, with some

attempting to draw a connection to their participation in EITI. However, he noted that these allegations had been investigated and found to be unfounded, with no established link to EITI participation. The committee agreed to push back on this language and request that the Validation team provide evidence to substantiate the assertion. It was further noted that the MSG could take an "offensive" approach by demanding that the Validation team provide the basis for their claims, just as the MSG is required to provide evidence for its own assertions.

The committee agreed to delete the phrase "fear of reprisal" and to include a comment in the MSG's response requesting evidence for this characterization.

The Consultant also provided an update on efforts to fill the two vacant civil society seats on the MSG. He explained that Oslo had recruited a facilitator from Trinidad to work collaboratively with CIBIC, Mr. Derrick John, and Policy Forum. The facilitator had conducted one-on-one sessions with civil society representatives and had convened a large meeting with all of civil society to develop new rules and guidelines for the nomination process. A formal nomination meeting is scheduled for October 19, 2026, at the Marriott, where civil society representatives will work toward finalizing nominations. Mr. Tokpah noted cautious optimism, but acknowledged that some participants appeared to have a "my way or the highway" approach, and that the outcome remained uncertain.

The Chair noted that the forthcoming consultant-supported civil society engagement sessions, scheduled for October 16–17, 2026, with Mr. Tokpah arriving on October 15 and departing on October 18, should be referenced in the MSG's response as evidence of proactive efforts to address civil society participation concerns.

5.3 Monitor Adherence to Civil Society Participation Protocols

The third recommendation called for the MSG to consider a formal mechanism to regularly monitor adherence to the protocol on civil society participation, including risks of weakened participation derived from self-censure or fear of reprisal.

The committee agreed that the reference to "fear of reprisal" in this section should also be challenged, consistent with the discussion under the previous recommendation.

The recommendation proposed that monitoring could include tools such as a standing MSG agenda item and regular consultations beyond the MSG, "or any other fit-for-purpose and adapted to the Guyana context." The Chair h questioned the meaning of "fit-for-purpose," and the Consultant clarified that the language was intended to give the MSG flexibility to adopt any process or tool that works in the Guyana context, rather than prescribing a specific approach.

The Consultant further explained that the EITI Standard includes a civil society protocol, and that the recommendation is essentially asking the MSG to periodically engage civil society as a constituency to check whether there are any concerns, threats, or barriers to participation. He noted that the upcoming October 16–17 engagement sessions would serve precisely this purpose, and should be highlighted in the MSG's response.

The committee agreed that this recommendation was reasonable and aligned with ongoing efforts.

5.4 Strengthen Follow-Up and Accountability on Recommendations

The fourth recommendation called for GY EITI to establish a single public tracker that consolidates corrective actions and recommendations from EITI reporting, validation, and commissioned studies, assigns clear priorities, responsible entities, and timelines, and records formal agency responses and progress updates.

The Chair asked whether this meant creating a public tracker on the website. The Consultant clarified that the work plan already serves as a public tracker, and that some countries create a secondary, validation-specific tracker that outlines all recommendations from the validation report and tracks what has been done in response. He noted that the information could also be included in the annual progress report.

The Chair confirmed that GY EITI had included validation recommendations in the work plan following the previous validation cycle, and asked the Secretariat to provide evidence of this practice. She further directed that the annual progress report should include a dedicated table listing all validation recommendations, responsible entities, timelines, and actions taken. The Consultant confirmed that the annual progress report already captures some of this information, and that the MSG could simply redirect the Validation team to that report as evidence of compliance.

The committee agreed that this recommendation was already substantially addressed through existing practices, and that the MSG's response should highlight the work plan and annual progress report as evidence.

5.5 Shift Focus from Statutory Frameworks to Evidence of Implementation in Practice

The fifth recommendation called for GY EITI to shift focus from disclosing statutory frameworks to evidence of how rules and procedures are implemented in practice, including any deviations from established procedures.

The Chair noted that this theme had appeared throughout the Validation Report. The recommendation stated that reporting should disclose how rules and procedures are applied in practice — such as in license awards and transfers, consultation with affected communities, and beneficial ownership verification — and should identify where laws, policies, or contractual requirements are not implemented as intended, explain the causes of these gaps, and track corrective actions.

The Consultant explained that much of this responsibility falls on the Independent Administrator (IA). The IA should assess whether there have been any material deviations from legal requirements in areas such as license issuance and contract awards, and should document those deviations in the EITI report. He proposed that the MSG develop a working template to track and document deviations between statutory requirements and actual practice, and that this template be embedded into the annual progress report process.

The Chair directed the Secretariat to include a note in the scoping report for the 2024 EITI report to ensure that the IA is explicitly required to record any gaps between statutory requirements and actual practice. She further requested that the annual progress report include a mechanism for correlating gaps identified in the IA report with corrective actions tracked by the MSG.

The committee agreed that this recommendation was actionable and aligned with the MSG's commitment to evidence-based reporting.

5.6 Improve Transparency and Oversight of Medium-Scale and Informal Mining

The sixth recommendation called for GY EITI to improve transparency and oversight of medium-scale, artisanal, and informal mining, given their significance to the sector.

The Chair acknowledged that informal mining remains a significant data gap and a persistent challenge. The Consultant noted that the informal sector is by definition difficult to assess, and that the standard approach in other EITI implementing countries is to conduct a study to assess practical ways to mainstream disclosures from the informal sector. He explained that some countries have created secondary reconciliation reports focused specifically on small-scale miners, reconciling what small-scale miners pay to the government with what the government receives.

The Consultant reminded the committee that he had previously developed a Terms of Reference (TOR) for a study on the artisanal and small-scale mining (ASM) sector, which had been circulated to the PS and the committee but had not progressed. He noted that the Validation Report had referenced this TOR, and suggested that the committee review and refine the TOR and use it as the basis for commissioning the study. He acknowledged that the study could not be completed in time for the current validation cycle, but that initiating the process and demonstrating a clear intention to address the issue would represent a positive and credible step in the MSG's response.

The Chair noted that the Bureau of Statistics has some information on the informal mining sector, but that it may not be technically comprehensive or officially documented. She agreed that the study should be commissioned, and directed the Secretariat to flag the ASM study TOR for review by the committee.

The committee agreed that this recommendation was important and that progress should be made, even if the full study could not be completed within the validation timeline.

5.7 Improve Quality and Use of Social and Environmental Payment Data

The seventh and final recommendation under Key Recommendations called for GY EITI to improve the quality and usability of Amerindian Fund and community social and environmental payment data to better inform community engagement and development outcomes. The recommendation stated that disclosures should clearly identify the legal or contractual basis, nature, beneficiary, and purpose of mandatory and discretionary payments, and that data should be aggregated by company, project, expenditure type, and beneficiary, and disaggregated where available. The recommendation further stated that data should be presented in accessible formats so communities can assess whether miners' contributions address local needs and deliver tangible public benefit.

The Chair read through the recommendation and remarked that it "looks like a lot of work," and questioned whether this was an EITI mandate. Mr. Tokpah clarified that while the language was detailed, the underlying requirement was straightforward. He explained that the EITI Standard distinguishes between voluntary and mandatory social and environmental expenditures, and that the MSG must first agree on a threshold for mandatory expenditure disclosures. He noted that this threshold had been discussed previously but had not yet been formally decided.

The Consultant proposed that the MSG's decision for the October 7 meeting should include a resolution on the disclosure threshold. He suggested that the MSG could decide that all mandatory payments — those required by law or contract — must be disclosed, regardless of amount, and that the MSG would commit to revisiting voluntary/discretionary payment disclosures at a defined future date. He clarified that once the mandatory disclosure threshold is established, the questions about data quality and verification become more straightforward: the MSG must decide whether to require unilateral disclosure by companies, or to reconcile disclosed amounts with community or government records.

The Chair agreed with this approach and directed the Secretariat to prepare a decision paper on mandatory social and environmental payment disclosure thresholds for the MSG meeting on October 7. She noted that the MSG's working position should be that all mandatory payments are disclosed, with a commitment to revisit voluntary payments at a defined future date, and that the decision paper should reflect what is practically doable at the current time while committing to future progress.

The committee agreed that this recommendation was actionable and that the decision paper should be prioritized.

6. Validation Report Submission — Format and Extension

6.1 Two-Week Extension

As the committee was nearing the conclusion of the Key Recommendations review, The Consultant informed the group that he had spoken with the Validation Lead earlier that day, and that the Validation Lead had indicated openness to granting a two-week extension for submission of the MSG's feedback on the Validation Report, subject to a formal request from the MSG. The Chair welcomed this news, and the committee agreed to table the request for a two-week extension as an agenda item for the MSG meeting on October 7, 2026. The extension would move the submission deadline from October 16, 2026, to approximately October 30, 2026.

6.2 Submission Format

The Secretariat raised an important procedural question regarding the format for the final submission of the MSG's feedback on the Validation Report. The Secretariat noted that the initial plan had been to prepare a separate document with the MSG's comments, but that this approach was proving tedious, as it required constant cross-referencing back to specific page numbers and paragraphs in the report. The Secretariat suggested that it would be more practical to submit a track-changes version of the Validation Report itself, with comments embedded directly in the document, and to append any supporting documents as annexes.

The Chair agreed with this approach and proposed that the final submission should consist of two elements: (1) a track-changes version of the Validation Report with all MSG comments embedded and attributed to "GY EITI" (not individual names), and (2) a cover letter of no more than two pages capturing the MSG's overarching concerns and positions. She noted that the cover letter should be prepared collaboratively by the Secretariat, the Chair, and Mr. Tokpah, and should be vetted by the full committee before submission.

The Consultant agreed that this format made the most sense, but indicated that he would confirm with the Validation Lead that this approach was acceptable. He committed to providing feedback to the committee by the following day.

The Secretariat was directed to ensure that the working copy of the Validation Report — which had been annotated with comments throughout the review process — was cleaned up and that all comments were attributed to "GY EITI" rather than to individual reviewers. The Chair explained that this could be accomplished in Microsoft Word by changing the document properties to specify "GY EITI" as the user, so that all comments would appear under that name.

The committee agreed on this format and directed the Secretariat to begin preparing the annotated document and to draft an outline for the cover letter.

7. Communication Survey

The Consultant reminded all attendees to complete the communication survey on behalf of EITI International. He noted that the survey was an important input into EITI's communications strategy and encouraged members to participate. Ms. Roopnauth confirmed that she had already completed the survey. Mr. Rafeek Khan noted that he had submitted comments via the survey and requested that the Secretariat confirm whether those comments had been captured. The Consultant agreed to follow up and confirm.

The Chair directed the Secretariat to share the survey link via the WhatsApp group to facilitate wider circulation, noting that this would make it easier for members to forward the survey to colleagues and stakeholders. The Secretariat agreed to circulate the link immediately following the meeting.

The Chair further requested that the communication survey be added to the agenda for the MSG meeting on October 7, so that the full MSG could be briefed on the survey and encouraged to participate.

8. Next Meeting and Homework Assignment

noted that the committee had made significant progress, having completed the Key Recommendations section of the Validation Report. She noted that the remaining sections to be reviewed were pages 8 through 15, covering Requirements Subject to Midterm Monitoring, the Validation Scorecard, Outcomes and Impact, and Corrective Action and Strategic Recommendations (Section 1).

She directed all attendees to read through these sections in preparation for the next meeting, and emphasized that civil society participation and engagement would be especially important going forward, as comments from all constituencies needed to be documented in the minutes for the Validation team. She specifically requested that Mr. Balraj Budwah review the remaining sections and come prepared with comments, noting that civil society input was critical to demonstrating balanced MSG participation.

The Chair confirmed that the next meeting would take place on Tuesday, October 6, 2026, from 9:00 AM to 10:15 AM (allowing for an hour and 15 minutes if needed), with the goal of completing the review of the remaining sections of the Validation Report.

9. Any Other Business

Mr. Rafeek Khan extended congratulations to the Chair on the launch of the Guyana Development Bank. The Chair acknowledged the congratulations and noted that the work had been done by a dedicated team, to whom she would convey the committee's appreciation.

10. Adjournment

The Chair thanked all members for their participation and flexibility, particularly those who had stayed beyond their scheduled hard stops to ensure quorum and progress. She noted that the committee had covered substantial ground, having addressed the mining definition document and completed the Key Recommendations section of the Validation Report. She reminded members to complete their homework assignment and to come prepared for the next session. The meeting was adjourned at approximately 14:38 hrs.

11. Summary of Key Decisions and Next Actions

The following table consolidates all key decisions made and action items assigned during the meeting:

Item	Decision / Action	Responsible Party	Notes
1	Mining definition document to be presented at MSG meeting (not round robin) for formal decision	MSG	Consensus-based decision preferred over email round robin
2	Definition of small/medium/large-scale mining applies to gold mining only — must be explicitly stated in document	Secretariat / Sam	Excludes bauxite, diamonds, sand, stone mining
3	250-ounce threshold must be time-bound and clearly defined (e.g., per 24-hour period)	Secretariat / Sam	Language must be tightened for clarity
4	Request two-week extension for Validation Report submission to be tabled at MSG meeting	MSG / Secretariat	Extension from Oct 16 to approx. Oct 30, 2026
5	Final Validation Report submission format: track-changes document with embedded comments + cover letter (max 2 pages)	Secretariat / Chair / Sam	Sam to confirm format acceptability with Validation Lead
6	All comments in Validation Report to be attributed to "GY EITI" (not individual names)	Secretariat	Use Word document properties to standardize attribution
7	Decision paper on mandatory social and environmental payment disclosure threshold to be prepared for MSG	Secretariat	Recommend all mandatory payments be disclosed regardless of amount; commit to revisiting

			voluntary payments at future date
1	Develop Standard Operating Procedure (SOP) for sending meeting invitations via Outlook and brief all staff	Secretariat	To ensure consistent calendar invitation system
2	Reach out to civil society representatives (Madhavi, Shane Cornelius, Budwah) individually via WhatsApp to confirm attendance	Secretariat	To ensure civil society participation in meetings
3	Obtain mining definition document officially from GGMC with Commissioner's signature and circulate to MSG members	Secretariat	Formal record from GGMC required
4	Circulate original GGMC communication (received via PS) to all MSG members	Secretariat	For transparency and member reference
5	Reach out to GGMC to clarify mining definition and ensure consistency with Ministry of Finance reporting	Chair (MOF)	Alignment with budget speeches and mid-year reports
6	Tidy mining definition document into clear decision paper format with recommendation for MSG adoption	Sam	Must clearly state what MSG is being asked to decide
7	Verify with Validation Lead the preferred format for submitting MSG's feedback on Validation Report	Sam	Confirm track-changes + cover letter approach is acceptable
8	Prepare cover letter (max 2 pages) to accompany final Validation Report submission	Secretariat / Chair / Sam (collaborative)	To be vetted by full committee before submission
9	Clean up annotated Validation Report document; ensure all comments are attributed to "GY EITI"	Secretariat	Remove individual names; standardize attribution
10	Add request for two-week extension to agenda for MSG meeting on October 7	Secretariat	Formal MSG approval required
11	Share communication survey link via WhatsApp group to facilitate wider circulation	Secretariat	Survey takes 12-15 minutes to complete
12	Add communication survey to agenda for MSG meeting on October 7	Secretariat	To brief MSG and encourage participation

13	Review remaining sections of Validation Report (pages 8-15: Requirements Subject to Midterm Monitoring, Validation Scorecard, Outcomes and Impact, Corrective Action and Strategic Recommendations) and prepare comments	All Attendees (especially civil society)	Civil society input critical for demonstrating balanced MSG participation
14	Include note in scoping report for 2024 EITI report to ensure IA records any gaps between statutory requirements and actual practice	Secretariat	Addresses Recommendation 5.5 (shift focus to evidence of implementation)
15	Include table in annual progress report listing all validation recommendations, responsible entities, timelines, and actions taken	Secretariat	Public accountability tracker for validation recommendations
16	Review and refine Terms of Reference (TOR) for study on informal/artisanal and small-scale mining sector; commission study	Sam / Committee	Study may not be completed within current validation cycle but demonstrates commitment to addressing informal sector transparency
17	Check Bureau of Statistics for existing information on informal mining sector	Chair (MOF)	May inform study design and scope
18	Confirm whether PS MNR and GRA reference EITI data in their annual reports	Secretariat / Chair	Evidence for public use of EITI data
19	Follow up with Mr. Rafeek Khan regarding comments submitted via communication survey	Sam	Confirm comments were captured

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Minutes prepared by: GY EITI Secretariat

Date: 10/06/2026

Name	Organization / Role	Constituency	Gender	Present	Excused	Absent
Ms. Sonya Roopnauth	Chair, Workplan, Validation and TOR Committee / Ministry of Finance	Government-Online	Female	✓		
Mr. Joachim Vogt	ECO Atlantic	Industry-Online	Male	✓		
Mr. Rafeek Khan	MSG Member	Industry-Online	Male	✓		
Mr. Persaud, Teijvarti	MSG Member	Government-Online	Male	✓		
Mr. Shahrukh Hussain	MSG Member	Government-Online	Male	✓		
Mr. Anand Gohil	CNOOC	Industry-Online	Male	✓		
Mr. Balraj Budwah	Civil Society Representative	Civil Society-Online	Male	✓		
Ms. Onica	GYEITI Secretariat	GYEITI Staff-Online	Female	✓		
Sam Tokpah	Consultant — Observer	Observer-Online	Male	✓		
Mr. Renrick Ramgobin	GYEITI Secretariat	GYEITI Staff-Online	Male	✓		
Ashantie Williams	GYEITI Secretariat	GYEITI Staff-Online	Female	✓		

MINUTES OF THE 11TH MSG REVIEW MEETING OF THE DRAFT VALIDATION REPORT, HELD ON OCTOBER 6, 2026

VIRTUAL VIA ZOOM: 08:51 HRS – 10:00 HRS

Chair: MS. SONYA ROOPNAUTH, CHAIRPERSON OF THE WORKPLAN, VALIDATION AND TOR COMMITTEE

1. Call to Order and Opening Remarks

The meeting was called to order at approximately 08:51 hrs. by the GY EITI Secretariat. Ms. Sonya Roopnauth assumed the chair and confirmed that a quorum was present upon the arrival of a civil society representative.

At the opening of the session, the Secretariat noted several attendance uncertainties. Ms. Madhavi had indicated she would join but her status remained uncertain, and Mr. Cornelius was unable to attend due to internet connectivity problems. The Secretariat also noted that an updated contact number for Spur was unavailable, and committed to obtaining and sharing the correct number.

Mr. Joachim Vogt confirmed a hard stop at 10:00 hrs., as did Ms. Persaud, Teijvarti. The Chair confirmed that a quorum was present — with the GY EITI Secretariat, government, industry, and a GAWU civil society representative in attendance — and proposed to resume the Validation Report review from where the previous session had concluded, beginning at the Effectiveness and Sustainability section on page 10.

2. Members' Attendance

Members in attendance, virtually, included representatives from government, industry, civil society, and the GY EITI Secretariat. Members present included:

Ms. Sonya Roopnauth (Ministry of Finance, Chair); Mr. Renrick Ramgobin (GY EITI Secretariat); Mr. Persaud, Teijvarti (MSG Member); Mr. Joachim Vogt (MSG Member); Mr. Shahrukh Hussain (MSG Member); Ms. Onica (GY EITI Secretariat); and a GAWU representative (Civil Society).

Apologies were noted from Mr. Cornelius (internet connectivity issues) and Ms. Madhavi (status uncertain). Mr. Sam Tokpah was noted as likely occupied with other engagements and did not attend this session.

3. Announcements

The Secretariat noted the following administrative matters:

- The Secretariat confirmed that the project definition document was still awaiting outstanding feedback from the Permanent Secretary (PS) before it could be finalized and circulated ahead of the following day's meeting, scheduled to begin at 10:30 hrs.
- Mr. Joachim Vogt raised a query regarding the small-scale mining definition document, noting that the production figure of 250 pounds remained ambiguous as it was not time-bound. The Secretariat committed to double-checking whether the figure was intended to be expressed as a rate (e.g., per 24 hours).

- The Chair confirmed that the committee would proceed with the Validation Report review, picking up from the Effectiveness and Sustainability section on page 10.

4. Review of the EITI Validation Report — Effectiveness, Sustainability, and Work Planning

4.1 Effectiveness and Sustainability (Page 10)

The committee resumed its review of the Validation Report at the Effectiveness and Sustainability section. Members noted that Guyana had been awarded additional points — specifically a 0.5 score — for its efforts in advancing domestic resource mobilization and energy transition, including meaningful engagement with Amerindian people. This was recognized by the committee as a positive outcome worthy of note.

However, the committee's attention was drawn to language in the same section that tempered these gains. Specifically, a sentence indicated that progress had been "overshadowed by concerns that part of civil society has disengaged or felt marginalized since 2025 following the inconclusive nomination process, limiting the platform's ability to provide fully balanced oversight." The committee discussed this characterization at length.

The Chair clarified that it was not civil society as a whole that had disengaged, but rather a segment thereof, and emphasized that this important distinction must be accurately reflected in the language of any MSG response. The Chair noted that the meaning of "platform" in this context — whether it referred to EITI Guyana broadly, or to the NGO constituency specifically — required clarification. Mr. Vogt suggested it referred to the NGO platform, and the committee agreed to seek the Consultants' input on this point.

Mr. Vogt noted that additional context may be available after October 19, 2026, when the civil society nomination meeting is scheduled, and that a positive outcome from that process could significantly soften the characterization. The committee therefore agreed to defer a definitive response on this paragraph until after October 19, 2026.

Action — GY EITI Secretariat: Highlight the section referencing civil society disengagement and add a comment to review and update post-October 19th, 2026, in light of the outcome of the civil society nomination meeting.

4.2 Data Accessibility and NRF Transparency

The committee reviewed the data accessibility section, which contained the statement: "There are still significant gaps in source information." The Chair expressed concern that this assertion may not accurately reflect recent corrective actions and additional data submissions undertaken by GY EITI. She indicated that the Secretariat and Sam should review the accuracy of this statement in light of the corrections made and additional information provided, before accepting it as a settled finding.

Action — GY EITI Secretariat: Highlight the sentence "There are still significant gaps in source information" and add a comment for Sam to verify whether this remains accurate given recent corrections and data submissions.

The committee also reviewed the paragraph beginning "Taken together, the efforts on transparency of the NRF…" The Chair noted that the National Resource Fund (NRF) legislation itself mandates specific levels of transparency, and that the paragraph should be strengthened to clearly recognize that these are national efforts driven by law — not attributable solely to EITI. She observed that the current framing could inadvertently imply that EITI was the primary driver of NRF transparency, which was not entirely accurate. The committee also noted a typographical error in this section, which referenced "1.5 points" where the apparent maximum score is 1.

Action — GY EITI Secretariat: Highlight the paragraph beginning "Taken together, the efforts on transparency of the NRF…" and add a comment to possibly strengthen the language to better recognize national efforts on NRF transparency, and flag the apparent typographical error on the score.

4.3 Work Plan Alignment with National Priorities (Requirement 1.5)

A significant portion of the session was dedicated to reviewing the findings under Requirement 1.5 (Work Planning and Annual Reviews). The Validation Report noted that while Guyana had maintained published work plans throughout the period under review (2025–2026), the work plan "does not clearly articulate its alignment with national priorities," and that there is "limited evidence of consultation beyond the Multi-Stakeholder Group (MSG)."

The committee sought to understand precisely what the Validation team meant by "alignment with national priorities." The Chair noted that the national priorities are reflected in the budget speech, but the previous validation cycle had primarily required the work plan to address gaps identified in the Validation Report — not to map against broader national development priorities. It was suggested that a simple mapping matrix linking work plan activities to national priorities could serve as a practical response.

The committee also noted that the Secretariat had previously presented a stakeholder engagement proposal to the MSG, which envisaged each constituency holding meetings with its wider constituents to inform gap identification and work plan development. Concerns were raised at that time about the resource implications of such sessions, and the committee agreed that planning for this kind of engagement would need to begin well in advance of the next work plan cycle.

Action — GY EITI Secretariat: Add a note to the Validation Report document querying whether a mapping to national priorities is required, and if so, which national priorities should be referenced. Flag for Sam to clarify, given that the previous requirement was to ensure the work plan addressed identified gaps rather than broader national priorities.

On the question of "limited evidence of consultation beyond the MSG," the committee noted that neither industry nor government constituencies had conducted formal outreach beyond their MSG representatives, and that this was an area requiring improvement. Mr. Vogt acknowledged that outreach within the industry sector was particularly challenging to document. Ms. Roopnauth raised the question of whether constituency meeting minutes would constitute sufficient evidence of broader consultation.

Action — GY EITI Secretariat: Flag the point on "evidence of consultation beyond MSG" and ask Sam to clarify exactly what form of evidence is being sought, and what would constitute acceptable documentation of consultation with broader constituencies.

The committee further noted several specific concerns raised in the work plan section, including:

- The work plan presents three inconsistent total cost figures — the committee agreed to seek clarification from the Consultant on this discrepancy.
- No activities are mapped to production and export data, revenue collection, data quality, or revenue distribution, despite outstanding corrective actions on Requirements 4 and 5.
- The annual progress review records activities mainly by completion status rather than assessing outcomes or results — a concern that the committee agreed to flag as a standing action item.
- The work plan does not explain why certain EITI requirements were prioritized or omitted.

Action — GY EITI Secretariat: Add a to-do item asking Sam to advise on which EITI requirements were prioritized or omitted and why, so that the Secretariat can provide a clear rationale in the MSG's response.

Action — GY EITI Secretariat: Flag the line referencing "assessment of what outcomes were achieved rather than as completion of status of activities" as an action item, and note that this requires a shift toward outcomes-based reporting in future annual progress reviews.

The Cahir expressed concern that the goalposts appeared to be shifting between validation cycles — from a focus on addressing gaps to a focus on national priority alignment and outcomes-based assessment. She requested that the Secretariat circulate the previous Validation Report so that members could compare requirements across cycles.

Action — GY EITI Secretariat: Circulate the last Validation Report to all committee members later that day to enable direct comparison with the current report.

5. Inclusiveness, Linguistic Diversity, and Indigenous Language Translations

5.1 Inclusiveness and Indigenous Peoples Representation

The committee reviewed the corrective action language under Requirement 1.5, which stated that GY EITI "gives limited attention to inclusiveness, no reference to Amerindian people, linguistic diversity, or translation." The committee disagreed with this characterization and noted several important points in response.

The Chair emphasized that the MSG includes Indigenous peoples — the National Toshaos Council (NTC) is represented in the MSG — and that this should be explicitly noted in the MSG's response. She further requested clarification on how many EITI implementing countries globally have addressed "linguistic diversity" requirements, and in what form, so that an appropriate benchmark can be applied.

Action — GY EITI Secretariat: Add a comment to the inclusiveness section noting that the MSG includes Indigenous peoples, and request clarification from Sam on what "linguistic diversity" means in a global EITI context — including how other implementing countries have addressed this requirement.

5.2 Murandoi Outreach and Creolese as Evidence of Linguistic Diversity

Mr. Vogt raised the point that the Murandoi outreach — which had been conducted in Creolese — constituted a meaningful step toward addressing linguistic diversity requirements. The committee agreed that this example should be explicitly referenced in the MSG's response as evidence that GY EITI has taken practical steps to reach audiences in accessible language.

Action — GY EITI Secretariat: Include a note in the relevant section of the Validation Report document that the Murandoi outreach was conducted in Creolese, and that this represents a concrete example of addressing linguistic diversity in the Guyana context.

The committee further noted that the status of ongoing Murandoi engagement was unclear — a proposal had been put forward, but cost considerations were under review by the PS, with Mr. Earl expected to provide feedback. The Secretariat was asked to follow up.

Action — GY EITI Secretariat: Check whether there is still an ongoing engagement with Murandoi and follow up with Mr. Earl for feedback on the proposal.

5.3 Indigenous Language Translation — Feasibility and Utility

The Validation Report noted that "translation of reports into Indigenous languages remains yet to be delivered." The committee engaged in a substantive discussion about the feasibility and utility of translating EITI reports into Indigenous languages.

It was observed that a full translation would be impractical given the vocabulary limitations of Indigenous languages in relation to technical economic and extractive sector terminology. He suggested that a condensed summary document — translated into a single widely understood Indigenous language — might be a more proportionate and realistic approach.

The Chair noted that Guyana has nine Indigenous tribes, each with its own language, and that the practical and demographic dimensions of this requirement needed to be assessed by someone with direct community knowledge. She indicated that she would defer to Civil Society Co-Chair (NTC) for guidance on what would be meaningful and appropriate, noting that Guyana has experienced significant language loss over generations and that many Amerindian community members are English-speaking.

The committee agreed that a summary document — analogous to a "budget at a glance" — might be a proportionate response, and that a full consultation with Mr. John was needed before any commitment was made on scope or language.

Action — Sonya Roopnauth: Consult with Mr. John on the feasibility and utility of Indigenous language translations, including whether a summary version would be more appropriate, and discuss Murandoi engagement and linguistic diversity requirements with Mr. John and Sam.

6. Civil Society Representation and GAWU Membership

The committee discussed the expanded reach and representativeness of the current civil society constituency, with particular focus on GAWU's (Guyana Agricultural and General Workers Union) membership base.

The GAWU representative confirmed that the union currently has just over 9,000 members, organized across 26 groups and branches, meeting monthly. These branches are located across Regions 3, 4, 5, and 6, as well as in Bartica and Port Kaituma. The GAWU representative also noted that GAWU serves as the representative body for Guyana Gold Board workers. It was noted that this was a compelling demonstration of an expanded and inclusive civil society constituency — GAWU's diverse membership spanning multiple professional fields and geographic regions represents a significant improvement in the breadth of civil society representation on the MSG. The committee agreed that this should be prominently referenced in the MSG's response to counter the characterization of limited inclusiveness.

Action — GY EITI Secretariat: Add a comment to the inclusiveness section emphasizing the expanded reach of the current civil society membership, noting GAWU's 9,000+ members and 26 groups and branches across Regions 3, 4, 5, 6, Bartica, and Port Kaituma. Use a "find" function (Control F) to locate all references to inclusiveness in the document and ensure this evidence is captured wherever relevant.

Action — GY EITI Secretariat: Work with GAWU to begin planning outreach activities with labor groups, leveraging the 26 groups and branches across the relevant regions to support broader stakeholder engagement going forward.

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7. Homework Assignment and Remaining Sections

As the session approached the hard stop of 10:00 hrs, the Chair noted that a number of sections of the Validation Report remained to be reviewed. Rather than rushing through these sections, she directed that the Secretariat circulate the remaining pages for members to review individually and submit their written comments by email — consistent with the approach previously used for the Google Doc review.

Action — GY EITI Secretariat: Send out the remaining page sections of the Validation Report document to all committee members, with a request that each member review and submit their comments by email ahead of the next meeting.

The Chair also confirmed that the next MSG meeting was scheduled for October 7, 2026, beginning at 10:30 hrs., with a hard stop at 10:00 hrs. (the meeting reference appears to indicate a scheduled

duration from 10:30 to end), and reminded members to finalize any outstanding tasks and prepare for that session.

8. Any Other Business

No additional matters were raised under Any Other Business. The Chair thanked all participants for their engagement and reminded members of their individual action items.

9. Adjournment

The Chair thanked all members for their participation and their commitment to the review process. The meeting was adjourned at approximately 10:00 hrs.

10. Summary of Key Decisions and Actions

No.	Action Item / Decision	Responsible Party	Reference Section
1	Double-check whether the production figure of 250 pounds in the small-scale mining definition document is time-bound (e.g., per 24 hours).	GY EITI Secretariat	Section 3 — Announcements
2	Send the updated contact number for Spur to GY EITI.	GY EITI Secretariat	Section 1 — Call to Order
3	Send out the finalized project definition document once outstanding feedback is received from PS.	GY EITI Secretariat	Section 3 — Announcements
4	Highlight the section on civil society disengagement ("concerns that part of civil society has disengaged or felt marginalized since 2025…") and add a comment to review and update post-October 19th, 2026.	GY EITI Secretariat	Section 4.1 — Effectiveness and Sustainability
5	Highlight the sentence "There are still significant gaps in source information" and add a comment for Sam to verify whether this remains accurate given recent corrections and data submissions.	GY EITI Secretariat	Section 4.2 — Data Accessibility and NRF Transparency
6	Highlight the paragraph beginning "Taken together, the efforts on transparency of the NRF…" and add a comment to possibly strengthen the language to better recognize national efforts on NRF transparency; flag the apparent typographical error on the score.	GY EITI Secretariat	Section 4.2 — Data Accessibility and NRF Transparency
7	Add a note querying whether a mapping to national priorities is required for the work plan, and if so, which national priorities should be referenced — for Sam to clarify.	GY EITI Secretariat	Section 4.3 — Work Plan Alignment with National Priorities

8	Flag the point on "evidence of consultation beyond MSG" and ask Sam to clarify exactly what form of documentation is being sought.	GY EITI Secretariat	Section 4.3 — Work Plan Alignment with National Priorities
9	Add a to-do item asking Sam to advise on the rationale for prioritizing or omitting certain EITI requirements in the work plan.	GY EITI Secretariat	Section 4.3 — Work Plan Alignment with National Priorities
10	Add a comment to the inclusiveness section noting that the MSG includes Indigenous peoples (National Toshaos Council), and request clarification from Sam on what "linguistic diversity" means in a global EITI context.	GY EITI Secretariat	Section 5.1 — Inclusiveness and Indigenous Peoples Representation
11	Include a note that the Murandoi outreach was conducted in Creolese as a concrete example of addressing linguistic diversity in the Guyana context.	GY EITI Secretariat	Section 5.2 — Murandoi Outreach and Creolese
12	Check whether there is still an ongoing engagement with Murandoi and follow up with Mr. Earl for feedback on the proposal.	GY EITI Secretariat	Section 5.2 — Murandoi Outreach and Creolese
13	Flag the line on "assessment of what outcomes were achieved rather than as completion of status of activities" as a standing action item for outcomes-based reporting in future annual progress reviews.	GY EITI Secretariat	Section 4.3 — Work Plan Alignment with National Priorities
14	Circulate the last Validation Report to all committee members later today for comparison with the current report.	GY EITI Secretariat	Section 4.3 — Work Plan Alignment with National Priorities
15	Send out the remaining page sections of the Validation Report for all members to review and submit comments by email before the next meeting.	GY EITI Secretariat	Section 7 — Homework Assignment and Remaining Sections
16	Work with GAWU to begin planning outreach activities with labor groups, leveraging the 26 groups and branches across Regions 3, 4, 5, 6, Bartica, and Port Kaituma.	GY EITI Secretariat & GAWU	Section 6 — Civil Society Representation and GAWU Membership
17	Add a comment emphasizing the expanded inclusiveness of civil society membership, noting GAWU's 9,000+ members and 26 branches across multiple regions. Use "Control F" to locate all references to inclusiveness and ensure this evidence is captured.	GY EITI Secretariat	Section 6 — Civil Society Representation and GAWU Membership

18	Consult with Mr. John (NTC) on the feasibility and utility of Indigenous language translations, including whether a summary version would be more appropriate, and discuss Murandoi engagement and linguistic diversity requirements with Mr. John and Sam.	Ms. Sonya Roopnauth	Section 5.3 — Indigenous Language Translation
19	Flag Section 5.1 of the Validation Report (Work Planning and Annual Reviews) as a standing item in the Work Plan Validation TOR Committee Agenda, despite the "Good" rating, due to the numerous outstanding issues raised.	GY EITI Secretariat	Section 4.3 — Work Plan Alignment with National Priorities

Name	**Organization / Role**	**Constituency**	**Gender**	**Present**	**Excused**	**Ab**
Ms. Sonya Roopnauth	Chair, Workplan, Validation and TOR Committee / Ministry of Finance	Government-Online	Female	✓		
Mr. Joachim Vogt	MSG Member	Industry-Online	Male	✓		
Mr. Persaud, Teijvarti	MSG Member	Government-Online	Male	✓		
Mr. Shahrukh Hussain	MSG Member	Government-Online	Male	✓		
Poorandad Narine	Civil Society Representative / Guyana Agricultural and General Workers Union	Civil Society-Online	—	✓		
Ms. Onica	GY EITI Secretariat	GYEITI Staff-Online	Female	✓		
Mr. Renrick Ramgobin (GY)	GY EITI Secretariat	GYEITI Staff-Online	Male	✓		
Mr. Sam Tokpah	EITI International Secretariat / Consultant	Observer-Online	Male			✓

GUYANA EXTRACTIVE INDUSTRIES TRANSPARENCY INITIATIVE

MULTI-STAKEHOLDER GROUP

MINUTES OF 12th VALIDATION REVIEW MEETING

Date: 8 October 2026
Time: 9:00 a.m. – 10:39 a.m.
Venue: Virtual Meeting
Host: GY EITI Secretariat

Attendance:

- Joachim Vogt (I)
- Rafeek Khan (I)
- Shahrukh Hussain (G)
- Sonya Roopnauth (G)
- Shane Cornelius (CS)
- Balraj Budwah (CS)
- Sam Tokpah, GYEITI Technical Advisor
- Renrick Ramgobin, GYEITI Staff

1. OPENING

The meeting commenced with members confirming that the screen and meeting materials were visible.

The Secretariat informed members of the passing of **Ashanti Williams' father**, following the family emergency that had caused her to leave the previous day's meeting. Members expressed their condolences and discussed arrangements for conveying the MSG's sympathies to Ashanti and her family.

The Chair indicated that she wished to pay respects and requested Ashanti's address. Joachim Vogt undertook to speak with Teij, the current MSG Chair, and Ms. Rajdai regarding the matter.

The meeting then proceeded with the substantive review of the EITI Validation Report.

2. EITI VALIDATION REPORT – FINAL REVIEW

The MSG continued its detailed review of the draft EITI Validation Report, focusing on comments, clarifications, the accuracy and tone of the report, and the proposed response to the EITI Validation Team.

Members noted that significant work had already been undertaken to review the report and a substantial number of **corrective actions and follow-up matters were identified**.

The MSG agreed that these matters should be prioritized, with particular attention to actions associated with requirements that received **"limited" or "poor"** assessments and those that could be addressed relatively quickly.

The Secretariat advised that Ashanti Williams had completed substantial work on changes to the relevant documents before the meeting.

3. EITI WEBSITE AND PUBLIC ACCESS TO INFORMATION

The MSG discussed concerns raised in the Validation Report regarding the currency and accessibility of information on the GY EITI website.

Members noted that:

- the extractive-sector data pages contain outdated contextual information;
- some data pages have not been updated with the latest EITI report information;
- the revenue page continues to display older information, including FY2020 figures;
- the website's data pages were last updated in May 2024; and
- the latest Validation Report currently available on the website is the 2021 report.

The Secretariat explained that the website requires dedicated staff time for content management, uploading reports and updating data pages. Although the issue has been raised previously, implementation has been affected by competing priorities and difficulties coordinating with the external website administrator remotely.

Rafeek Khan noted that keeping the website current would help increase public awareness and website traffic and would provide private-sector users and other stakeholders with a central source of current EITI information.

The MSG also discussed the **Beneficial Ownership (BO) Report**, noting that it is currently located within the news section rather than being prominently accessible as a key EITI publication.

The Secretariat agreed to follow up with the Permanent Secretary regarding urgent support for updating the website.

The Ministry of Natural Resources (MNR) was identified as a potential source of additional technical support, given that it has staff who manages the MNR and GFC websites. The possibility of requesting NDMA to assist was also discussed.

The current website contractor, **Mr. Roger Gajraj**, is contracted through MNR. Members noted the challenges associated with coordinating website changes remotely.

4. REQUIREMENT 7.2 – OPEN DATA

The MSG reviewed matters relating to **Requirement 7.2**, including:

- applying a named open license to EITI data;
- updating the Open Data Policy to reflect the 2023 EITI Standard;
- pursuing interoperability commitments;
- ensuring EITI data and revenue pages correspond with published report files; and
- reporting progress against the ratings identified in the Systematic Disclosure Feasibility Study.

The MSG indicated that these matters could be treated as strategic actions to be addressed following Validation, rather than matters requiring immediate completion before submission of the Validation response.

The need for continued website and IT support was recognized as important to implementation of these actions.

5. REQUIREMENT 7.3 – FOLLOW-UP ON EITI RECOMMENDATIONS

The MSG reviewed the assessment of **Requirement 7.3**, which received a **"limited"** assessment.

The MSG raised concerns regarding language in the Validation Report suggesting that there had been very little follow-up on EITI recommendations. Members noted that there is evidence of follow-up and implementation, including a tracking mechanism used with the workplan. It was also noted that implementation of recommendations had begun in 2025.

The MSG discussed previous meetings where data discrepancies and other recommendations had been considered and agreed that the report should more clearly reflect the evidence of follow-up undertaken.

Joachim Vogt emphasized that, a decision was taken by the MSG for the FY Report **recommendations to be owned by the MSG**, with technical support from the IA where appropriate. This will help ensure that recommendations are clear, constructive, properly justified and assigned for follow-up.

The Secretariat will review the FY2022 and FY2023 EITI Reports and previous recommendations to clarify the matters raised in the Validation Report.

6. STAKEHOLDER OUTREACH AND CIVIL SOCIETY AWARENESS

The MSG discussed the Validation Report's assessment of stakeholder outreach and awareness.

The report indicated that, from 14 activities reviewed, only two civil society participants indicated awareness of EITI. Members discussed whether this accurately reflected the extent of outreach undertaken and the effectiveness of existing communication channels.

Joachim Vogt questioned aspects of the report's framing, noting that stakeholder organisations also have a role in seeking and engaging with publicly available information.

Members discussed the use of WhatsApp groups and other social media channels to reach trade union and civil society representatives.

Shane Cornelius advised that communication with union executives and senior members takes place through WhatsApp groups within their respective clusters.

The MSG agreed that the EITI survey should be circulated more widely to improve the evidence available on stakeholder awareness and engagement.

Balraj Budwah agreed to share the survey with his group's executive and senior membership. Shane Cornelius agreed to circulate the survey to the relevant executives and encourage completion.

The Secretariat will follow up with Balraj and Shane to ensure they have the correct survey link.

7. HINTERLAND CONNECTIVITY AND OUTREACH

The MSG discussed internet connectivity in hinterland communities in the context of the Validation Report's assessment of stakeholder outreach.

Shahrukh Hussain advised that internet connectivity in hinterland communities has improved significantly, including through the use of **Starlink**, with reported speeds of approximately **300–400 Mbps**, although router capacity can occasionally be a constraint.

The MSG agreed that evidence of improvements in internet connectivity between 2021 and 2026 should be documented and included where relevant in the response to the Validation Team.

Shahrukh agreed to prepare a note providing a chronological account of improvements in hinterland connectivity.

8. COMMUNICATION MATERIALS AND EITI BANNERS

The MSG discussed the need for more visible EITI outreach materials.

It was noted that the Secretariat currently has approximately three EITI banners.

Members discussed acquiring additional banners for distribution across the three constituencies. The proposed distribution included banners for **government, industry and civil society**, with consideration also given to placement at Regional Democratic Councils and other strategic locations.

The Secretariat will follow up on obtaining additional banners and ensure that distribution is not limited to the Secretariat but supports outreach across the constituencies.

Rafeek Khan also undertook to remind Renrick Ramgobin about showcasing EITI at the upcoming GMS event and Renrick indicated that the Communications Officer will follow up to get the banners ready.

9. VALIDATION REPORT RESPONSE PACKAGE

The MSG discussed the structure and content of the formal response to the EITI Validation Report.

Joachim Vogt proposed that the submission package comprise:

- a **cover letter signed by all three MSG Co-Chairs**;
- **Annex A – a three-page Executive Summary**;
- **Annex B – a list of supporting attachments, notes and decisions**; and
- **Annex C – the edited Validation Report in review mode**, showing the proposed changes and comments.

Members agreed that the response should present a clear, evidence-based and coordinated position from the MSG.

Sam Tokpah advised that he would review the scoring applied to each EITI requirement and sub-indicator to ensure that the assessment is supported by empirical evidence. This work was expected to require at least one additional day, but Mr. Tokpah was advised to start as soon as practical.

The MSG agreed that all members should carefully review the draft cover letter and annexes before submission.

The Secretariat will prepare the cover letter and circulate it for review and approval by October 14, 2026.

10. VALIDATION RESPONSE EXTENSION

The MSG discussed the timeline for responding to the Validation Report.

The current deadline was noted as **16 October 2026**. The MSG agreed to proceed with a request for a **two-week extension**, with the proposed revised deadline being **30 October 2026**.

The Secretariat will prepare the extension request for circulation to the MSG. The draft is expected to be circulated by Tuesday, 13 October 2026, for review.

Members agreed that the extension would provide additional time to incorporate the MSG's review, complete the supporting documentation, address outstanding matters and ensure that the response to the EITI Secretariat is comprehensive.

11. SECRETARIAT RESOURCING AND SUPPORT

The MSG discussed the increasing workload associated with Validation, website management, stakeholder outreach, communications and data updates.

Members recognized the need for additional resources to enable the Secretariat to maintain the website, conduct outreach and keep EITI information current.

The challenges associated with relying on remote IT/website support were also discussed.

The MSG supported engagement with the Permanent Secretary to identify additional staff resources, preferably from MNR, to assist with website management. NDMA secondment was identified as an alternative option.

Members also commended the Secretariat for its professionalism, commitment and continued work throughout the Validation review process.

Joachim Vogt and Sonya Roopnauth highlighted the Secretariat's growing experience and suggested that this could be recognized appropriately in the Executive Summary accompanying the Validation response.

12. CLOSING

Members expressed appreciation for the collaborative effort undertaken by the MSG and Secretariat during the Validation review.

Sam Tokpah commended the Secretariat for the timely preparation of meeting minutes and the work undertaken to coordinate the Validation response.

The meeting concluded with agreement on the outstanding actions required to finalise the response package and continue stakeholder outreach.

13. DECISIONS AND FOLLOW-UP ACTIONS

No.	Matter	Decision / Follow-up Action	Responsible	Deadline
1	Condolences	Convey the MSG's sympathies to Ashanti Williams following the passing of her father and obtain her address so that respects can be paid.	Secretariat	Immediate
2	Condolences	Speak with Teij, current MSG Chair, and Raj regarding Ashanti's situation.	Mr. Vogt	Immediate
3	Website	Urgently follow up with the Permanent Secretary regarding updating the EITI website, particularly outdated data pages and the Open Data Policy.	Mrs. Roopnauth / Government	Immediate
4	Website	Identify the person from MNR who previously assisted with the EITI website and explore available support.	Secretariat	Immediate
5	Website	Explore assigning additional MNR staff to assist with website updates or, alternatively, requesting NDMA to second a staff member.	Mrs. Roopnauth / Government	Immediate
6	Website	Send the highlighted Validation Report paragraph concerning outdated website information to Sonya.	Secretariat	Immediate
7	Website / BO	Ensure the Beneficial Ownership Report and other key EITI documents are prominently and easily accessible on the website rather than being buried in the news section.	Secretariat / IT support	Follow-up required
8	Requirement 7.2	Address the Open Data Policy, open licensing, interoperability and alignment of website data pages with published EITI reports as part of the post-Validation work programme.	Secretariat / Mr. Tokpah / IT support	Post-Validation
9	Requirement 7.3	Review the FY2022/2023 Report and previous EITI recommendations to clarify the Validation Report's statements regarding follow-up and unresolved discrepancies.	Secretariat	Immediate
10	Requirement 7.3	Reflect in the Validation response the MSG's approach that EITI recommendations should be MSG-owned, with IA technical support where appropriate.	Secretariat / MSG	Validation response

No.	Matter	Decision / Follow-up Action	Responsible	Deadline
11	Validation scoring	Review and verify the scoring of each EITI requirement and sub-indicator to ensure the assessment is empirically supported.	Mr. Tokpah	Immediate
12	Corrective actions	Compile and prioritise the approximately 100 corrective actions/follow-up matters identified during the Validation review, with emphasis on “low-hanging fruit” and requirements assessed as limited or poor.	Secretariat	Immediate
13	Survey	Share the EITI survey with union executives and senior membership.	Mr. Budwah	Immediate
14	Survey	Circulate the EITI survey to the relevant executives/Toshao and encourage completion.	Mr. Cornelius/Mr. Budwah	Immediate
15	Survey	Follow up with Balraj and Shane to ensure they have the correct survey link.	Secretariat	Immediate
16	Hinterland outreach	Prepare a note documenting improvements in hinterland internet connectivity between 2021 and 2026, including relevant evidence of improved bandwidth.	Mr. Hussain	Immediate
17	Hinterland outreach	Obtain and incorporate Shahrukh's note into the Validation response where relevant.	Secretariat	Immediate
18	Outreach materials	Follow up on ordering additional EITI banners and ensure distribution across government, industry and civil society constituencies.	Mr. Earle	Immediate
19	Outreach materials	Consider additional strategic banner locations, including RDCs and other high-traffic stakeholder locations.	Secretariat	Follow-up
20	GMS event	Remind Earl about following up on the showcasing EITI at the upcoming GMS event.	Mr. Khan/Mr. Earl	Before event
21	Validation response	Prepare a formal cover letter for the Validation response, reflecting the MSG's review and proposed responses.	Secretariat	Draft for review
22	Validation response	Prepare the proposed three-page Executive Summary for Annex A.	Secretariat	With response package

No.	Matter	Decision / Follow-up Action	Responsible	Deadline
23	Validation response	Prepare Annex B listing supporting attachments, notes and decisions.	Secretariat	With response package
24	Validation response	Prepare Annex C containing the edited Validation Report in review mode.	Secretariat	With response package
25	Extension	Draft the formal request for a two-week extension of the Validation response deadline.	Secretariat	By Tuesday, 13 October 2026
26	Extension	Circulate the extension request to the MSG for review and Co-Chair approval/signatures.	Secretariat	Tuesday, 13 October 2026
27	Validation submission	All MSG members to review the cover letter and annexes thoroughly before submission.	All MSG Members	Before final submission
28	Validation deadline	Submit the Validation response beforethe revised deadline of **30 October 2026**, subject to approval of the extension.	MSG / Secretariat	30 October 2026
29	Recommendations	Ensure future EITI recommendations are clearly owned by the MSG and are constructive, evidence-based and properly justified.	MSG / Secretariat / IA	Ongoing
30	MSG contact details	Update contact information in the MSG WhatsApp group for Shane.	Mr. Cornelius/Secretariat	Immediate

14. KEY DECISIONS

The following were the principal agreements and recommendations to the MSG arising from the meeting:

1. **Validation response:** The MSG will prepare a comprehensive, evidence-based response to the Validation Report, supported by a cover letter, Executive Summary and annexes.
2. **Extension:** The MSG will request a **two-week extension**, from the current 16 October deadline to **30 October 2026**, to allow the review and response process to be completed properly.
3. **Validation scoring:** The scoring of requirements and sub-indicators will be reviewed to ensure that assessments are supported by empirical evidence.
4. **Corrective actions:** The approximately 100 identified corrective actions and follow-up matters will be compiled and prioritised, with immediate attention given to actions that can be addressed quickly and matters associated with lower-scoring requirements.

5. **Website:** The MSG recognised the urgent need to update the EITI website and improve access to current reports, data and key documents, including the Beneficial Ownership Report.
6. **Resources:** The Government/Secretariat will explore additional human resources and technical support for website management and related communications activities.
7. **Requirement 7.3:** The response will clarify the evidence of follow-up on EITI recommendations and reinforce the MSG's ownership of recommendations going forward.
8. **Outreach:** The MSG will strengthen stakeholder outreach through the EITI survey, WhatsApp and social media channels, improved internet access in hinterland communities, and additional physical outreach materials.
9. **Evidence on connectivity:** Improvements in hinterland internet connectivity between 2021 and 2026 will be documented for consideration in the Validation response.
10. **Secretariat:** Members commended the Secretariat's professionalism, commitment and work throughout the Validation review process.

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