Midterm evaluation of the Opening Extractives programme
Public summary report

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Credits

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Introduction

This report provides an independent midterm evaluation of the Opening Extractives (OE) programme, a collaboration between the Extractive Industries Transparency Initiative (EITI) and Open Ownership (OO), funded by the BHP Foundation (BHPF). The programme runs from 2021 to 2025 and is supporting work to open up data on the beneficial owners of extractives companies across 11 countries.[1]

The overall aim of the Opening Extractives programme is for "citizens of resource-rich countries to realise the maximum benefit from natural resource wealth, in part through the enhanced availability and use of beneficial ownership data".[2] With large volumes of revenue, extractive industries are vulnerable to corruption, often through the use of anonymously owned companies. The programme operates upon the logic that beneficial ownership transparency (BOT) helps to close this channel by collecting and publishing information about company ownership structures and supporting the use of this information. Ultimately, this should contribute to better governance in the extractive sector, meaning less revenue is diverted away from investing in the public services which all citizens deserve.

The key objectives of the OE programme are to:

1. "Enable governments and industry to disclose high quality, open beneficial ownership (BO) data for the extractives sector to improve transparency and accountability in resource-rich countries.
2. Build the capacity of government and local stakeholders to integrate, use, and analyse data in the public domain to improve accountability and governance in resource-rich countries.
3. Mobilise global support for BOT in the extractive industry and beyond, and adapt to post-COVID-19 governance challenges."[3]

In order to do this, the programme looks to contribute to three main outcomes:

1. "Ensure government, industry and civil society actors have greater access to comprehensive and reliable information on the ultimate owners of extractive industry companies.

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[1] EITI and Open Ownership. (2020). "Opening Extractives: Programme Proposal," p.6. The programme initially proposed to work in 8-10 countries.

[2] EITI and Open Ownership. (2020). "Opening Extractives: Programme Proposal," p.6.

[3] EITI and Open Ownership (2020). "Opening Extractives: Programme Proposal," p 6.

2. Enable government, industry and civil society actors to more easily identify and address corruption and mismanagement risks related to hidden ownership.
3. Advance BOT in the extractive industries and beyond in a post-COVID-19 context by documenting and communicating the impact and outcomes of the programme."[4]

The OE programme runs in a very unique manner. The programme splits work in half between the EITI, a large, multi-stakeholder organisation with 57 implementing countries, and Open Ownership, a smaller organisation focussed on technical reforms related to beneficial ownership transparency. Broadly, the EITI is responsible for securing the buy-in of government stakeholders and building political will in the countries engaged with to enact BOT reforms, while Open Ownership is responsible for offering technical and legal support to countries to help them in the implementation of BOT. As such, the OE programme has unique opportunities to draw from the combined strengths of both organisations.

This evaluation addresses two primary research questions. These are:

- What are the impacts, progress, gaps, and lessons from the past 2.5 years of this programme (in line with OECD DAC evaluation criteria)?

- How can Opening Extractives build upon these learnings (either by course-correcting or doubling down) to ensure maximum impact over the remainder of the programme?

Methodology

We worked with the OE programme at the start of the project to identify countries to focus on in the evaluation with a broad regional spread and a range of levels of progress. We gathered insights from seven out of the 11 countries involved in the programme, and chose three as focus countries, where we prioritised interviews with OE staff and partners. These countries include:

- **Argentina**[5]

- Ghana

- **Liberia**

- Mongolia

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[4] EITI and Open Ownership (2020). "Opening Extractives: Programme Proposal," p 7.

[5] Countries in bold are focus countries, where interviews were prioritised.

- **The Philippines**

- Senegal

- Zambia

The examples highlighted in the following sections come from these seven countries. Given that these are only a subset of the countries which are part of the OE programme, the examples given in the following sections are not exhaustive, but instead illustrative of trends that we observed in the interviews conducted for the evaluation.

To evaluate progress and outcomes in each country, we used qualitative research methods, consisting of **interviews** and **desk research**. To capture diverse perspectives, we conducted 26 interviews with OE programme leaders, in-country staff, external consultants and partners, and programme funders.

Due to time and resource constraints, the midterm evaluation prioritised interviews with OE programme staff and close partners in the programme's implementation. These included interviews with OE in-country staff, consultants working with the programme, EITI national coordinators, representatives from the BHP Foundation, and a few government and civil society partners. This spread of interviewees may have influenced the results of the evaluation, and these influences should be considered when reading the report.

Overarching findings

Main contributions of the Opening Extractives programme

The Opening Extractives programme has made significant progress over its first 2.5 years of implementation. The evaluation found evidence that the programme is delivering value across multiple areas including awareness raising, building capacity across government, providing technical assistance, and facilitating peer exchanges.

In particular, the OE programme has largely been successful in securing political will and stakeholder engagement, opening up a conversation about BOT reforms

among the governments engaging with the programme. As BOT is a relatively new and technical reform, understanding how to navigate complex stakeholder environments and communicating the value of BOT to stakeholders is key. Detailed stakeholder mapping exercises, as recommended by the donor's 2021 annual project report, have helped to contribute to this success.[6]

One of the most important milestones achieved by the OE programme so far concerns the programme's technical assistance to Liberia. Due to the support of the OE programme, Liberia is about to pass legislation that would allow it to begin the process of creating a beneficial ownership register.[7] When the legislation passes, this will be the first clear instance of demonstrated impact achieved by the programme.

More broadly, the technical support offered by the programme in multiple countries, which has been spearheaded by Open Ownership, was repeatedly highlighted as a clear game changer when it came to actually working towards implementing BOT reforms in the countries engaging with the programme. This evaluation recommends that OE focus particularly on this over the next 2.5 years, explicitly prioritising both securing political will and technical support to countries.

The following section gives an overview of the evaluation's key successes across each of the OECD DAC evaluation criteria, as well as overarching challenges and recommendations. These findings and recommendations are explored in more depth in the following chapters of the evaluation report.

Effectiveness and impact

Multiple interviewees said that an important contribution of the OE programme has been putting BOT on the national agenda in the extractives sector and 'silo-busting' by bringing together stakeholders that would not usually engage with each other.

The programme's success in this area represents a contribution to the first objective of the programme's implementation components, which is to "enable governments and industry to disclose high quality open BO data for the extractives sector to

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[6] Opening Extractives (2021). "BHP Foundation Project Annual Report. Reporting Period: January - December 2021."

[7] Liberia Extractive Industries Transparency Initiative (2023). "Liberians Urged To Champion Fight Against Corruption As Country Nears Developing Beneficial Ownership Register." https://www.leiti.org.lr/index.php/media/news/liberians-urged-champion-fight-against-corruption-country-nears-developing-beneficial

improve transparency and accountability in resource-rich countries."[8] Activity area 1, which focuses on sustaining political commitment and stakeholder engagement for BOT, feeds directly into this goal and is highlighted as one of the most important interventions identified in the EITI and Open Ownerships report on "Catalysing transformative change in beneficial ownership transparency."[9]

In many countries involved in the programme, the application of BOT in the extractives sector is not a mature concept. Countries may have already received support in other more traditional and less technical areas of governance and transparency reform. However, because BOT is relatively new, it has been important for the programme to first set the groundwork for the reform and clearly articulate to stakeholders its importance.

With regard to activity area 2, technical assistance was valued highly by interviewees across the board, and proved particularly successful in countries with specific goals targeting compliance with EITI's Requirement 2.5.

In a number of instances, interviewees highlighted work under activity area 2 as the programme's most important contribution to their work. This refers to both technical assistance in building and maintaining BOT registers and websites to share data more widely, along with legal assistance to help governments amend laws and regulations to allow for BO data to be collected and published.

The evaluation also found Opening Extractives' technical assistance to have been most effective in Liberia, where the programme has nearly reached a major milestone with regard to technical assistance, as the country is about to pass legislation that allows them to begin the process of creating a beneficial ownership register.[10] On a related point, interviewees valued the programme's efforts to build capacity among government stakeholders.

Multiple interviewees also highlighted the importance of capacity building within government to the overall advancement of BOT.

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[8] EITI and Open Ownership. (2020). "Opening Extractives: Programme Proposal," p 25.

[9] EITI and Open Ownership (2020). "Catalysing transformative change in beneficial ownership transparency." https://eiti.org/sites/default/files/attachments/extractives_industries_report.pdf, p 26.

[10] Liberia Extractive Industries Transparency Initiative (2023). "Liberians Urged To Champion Fight Against Corruption As Country Nears Developing Beneficial Ownership Register." https://www.leiti.org.lr/index.php/media/news/liberians-urged-champion-fight-against-corruption-country-nears-developing-beneficial

Capacity building involves educating government officials about the concept of BOT, including details on its implementation pathways and benefits, as well as specific training in how to collect and use BO data. The OE programme has been working to strengthen government capacity in a number of ways. This includes training clerks on how to effectively collect and register BO data, as well as educating government officials about the different ways an individual can be a beneficial owner of a country. These examples surfaced most often in reference to the OE programme's work in countries in Africa.

Across the board, governments, external consultants and EITI national coordinators have particularly valued the peer exchanges facilitated by the programme.

These opportunities for international engagement encourage governments to take national ownership over BOT policies, and in turn, bolster governments political commitment to reform. These peer exchanges include the Anglophone Africa peer exchange which brought together representatives from Ghana, Liberia, Zambia and Nigeria, as well as a Latin America peer exchange which brought together representatives from 10 countries.[11]

Relevance

Awareness raising activities conducted as part of the programme have been well tailored to local contexts.

In several countries in Africa in particular, OE programme staff worked with local communities on the ground to educate the public about the benefits of BOT. These locally specific awareness raising activities were shown to have worked well. In one instance, months after an OE programme awareness raising campaign, listeners called into a local radio station to ask questions about BOT and when the reform would happen.

On a similar note, engaging local consultants has also been a particularly effective strategy for the programme to offer locally specific support.

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[11] Opening Extractives (2022). "Progress report 2021/2022".
https://eiti.org/sites/default/files/2022-11/Opening%20Extractives%20Progress%20Report%202022.pdf, p 13.
EITI (2023). "Beneficial ownership transparency: an urgent agenda in Latin America and the Caribbean."
https://eiti.org/blog-post/beneficial-ownership-transparency-urgent-agenda-latin-america-and-caribbean

Previous Opening Extractives progress reports have highlighted the importance of local knowledge, particularly when adapting to unexpected political developments:

> "*Changes in national counterparts, scandals that can help elevate the policy salience of BOT or changes to civic space and political will that threaten the potential use of BOT data all require country-specific knowledge to promptly determine the most appropriate response.*"[12]

Whilst in-country leads have an in-depth knowledge of country contexts, several interviewees expressed that the local consultants engaged by the OE programme have also been particularly helpful due to their on-the-ground knowledge of the specific conditions and challenges in-country. A partner interviewee, for example, said that a benefit of engaging with the OE programme in comparison to other international programmes was that the consultant on the ground understood the country's context and could recommend realistic proposals for improvement.

Coherence

Multiple interviewees said that the OE programme is succeeding in working to drive progress towards BOT reform while supporting the broader work of OO and EITI.

The OE programme came through as an important contributing factor to the overall ecosystem of BOT reform and other relevant governance and transparency initiatives. As one interviewee explained, the OE programme in their country works as "additional support to the national EITI progress".

As another example of this, a number of interviewees highlighted the benefits of the EITI's multi-stakeholder groups in helping to build a strong community invested in BOT reforms. This, however, is not specific to the Opening Extractives programme, and is one of multiple benefits countries are deriving from their engagement with the EITI more broadly.

The evaluation found that the standards and incentives provided by the likes of FATF, the World Bank and the EITI Standard can be powerful levers to secure the political will of governments to implement BOT reforms. Though already

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[12] Opening Extractives (2022). "BHP Foundation Project Half Year Report. Reporting Period: April - June 2022," p.14.

engaging with these institutions, there is more the OE programme could do to take a strategic and prioritised approach to these engagements.

The Opening Extractives programme proposal states that OE "is designed to complement, leverage, and support existing work related to BOT and natural resource governance", citing a number of international bodies involved in consultation calls.[13]

In alignment with this, both EITI and OO have ongoing engagements with multiple multilateral institutions, and the OE programme has already supported several peer exchanges between countries involved in the programme and multilateral organisations including the African Development Bank, the Open Government Partnership, FATF's regional body for Latin America and the Caribbean and the OECD Global Forum. We also heard that the EITI Standard and FATF Recommendations can be powerful incentives to encourage governments to commit to BOT reforms.

However, the evaluation also identified an opportunity for the OE programme to look to create a more formal strategy for involving multilateral institutions in the programme, to make the most of their influence.

Sustainability and efficiency

Through the support of the OE programme, some partners are now in a better position to access further funding from other sources to continue with reforms.

This was the case for Liberia, which as a result of the advances made in the country with the OE programme has received further project support from the World Bank and the UNODC which are helping the country to implement their BO register. Open Ownership will be providing further support to Liberia in this area.

Overarching challenges

On a country level, the programme is encountering multiple expected challenges concerning BOT implementation and data use.

Whilst these challenges are already known to the programme, having been acknowledged in a number of progress reports over the past two years, they were also salient in evaluation interviews, and therefore are also highlighted in this report.

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[13] EITI and Open Ownership. (2020). "Opening Extractives: Programme Proposal," p.6.

In terms of the regional spread of challenges, many have arisen in Latin America, where countries have encountered greater barriers to progress, particularly when it comes to concerns around data privacy. Despite this trend, the challenges here are in no way unique to a particular region and still arise globally. Challenges which emerged recurrently throughout the research include:

- **Changes of governments, ministers, and officials:** As is a common challenge for government reformers in many fields, turnover in government roles, either through changes of administration or officials leaving their jobs to work elsewhere, can slow down or halt progress. Interviewees stressed that when a government official with a strong political will to implement BOT reforms leaves their job, the person who takes their place may not have the same strong desire to implement the reforms.

  As discussed later in the section on 'Opportunities to double down', the OE programme and funder's agile approach to prioritising and deprioritising work streams has been an effective strategy to deal with this inconsistency in political engagement. In countries that experience turnover in government roles which leads to a lessening of political will, the OE programme has deprioritised their efforts, instead shifting focus to places with stronger engagement. This has proved to be an effective strategy to work towards maximising the programme's impact.

- **Privacy concerns:** As explained by interviewees, the implementation of BOT reforms has been slowed by widespread concerns about data privacy among stakeholders, specifically around the disclosure of information about personal assets and wealth due to safety concerns. The OE programme has worked to share information with stakeholders to ease their concerns, but this remains a challenging area for the OE programme to fully address.

More broadly, this evaluation has found that there are several types of interventions that have been more challenging to implement. These include:

- **Data use interventions:** Interviewees explained that data use interventions are particularly challenging to implement in contexts where the quality of published data is low. Interviewees expressed that a greater focus on capacity building among CSOs and journalists, supporting more awareness raising campaigns with the public, and continuing to work to improve the quality of published data are the most effective means to address this challenge. The OE programme is already engaged in work around these areas.

As such, this is a challenge that the OE programme is very well placed to address as working to both improve the quality of published BO data, as well as training government officials and civil society organisations to make the best use of it are core aspects of the programme's implementation components, activities which feed into Outcome 2, "enabling the government, industry and civil society actors to more easily identify and address corruption and mismanagement risks related to hidden ownership."[14]

- **Legal obstacles:** interviewees shared that getting to a place where companies are legally required to disclose beneficial ownership information, and where that information is made fully available to the public for free is a challenging intervention to implement, as expected. Existing laws and regulations can act as a serious obstacle to BOT implementation.

  Where there is political will to pursue legal reform, the OE programme can support countries to help change their laws to allow for the disclosure of BO information, in particular through Open Ownership's legal assistance. Yet in some places, a country's existing legal structure could make this a quite difficult and time-consuming process. This is a challenge that the OE programme can only feasibly address by meeting countries where they are and helping them to collect and disclose BO data to the extent to which they are able to, which might not always align with 'perfect' implementation in the first instance.

More broadly, the other key challenges that the programme has encountered concern:

- **Sustaining political will and stakeholder buy-in to enact reforms, even in cases where there is more government continuity.**

  In addition to changes in political administration or civil servants leaving their roles, competing government priorities can lead to circumstances where political will is difficult to sustain. This is a challenge that OE is well equipped to work to address, as the EITI, in particular, is able to leverage its existing influence to encourage countries to comply with Requirement 2.5 to enact BOT reforms.

- **Building technical capacity among government officials, and the capacity of civil society organisations to use BO data.**

Multiple interviewees highlighted the capacity of civil society organisations and journalists to use BO data as an important challenge for the programme's sustainability. The OE programme has already seen several instances of success

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[14] EITI and Open Ownership (2020). "Opening Extractives: Programme Proposal," p 25.

regarding the value of work to build capacity among CSOs and journalists, including the work of Joining the Dots to use Nigerian beneficial ownership data to explore conflicts of interest.[15] However, more broadly, CSOs and journalists in many of the countries involved in the programme have relatively low levels of capacity to use BO data. This presents a challenge to the sustainability of BO reforms, as demand for the data by local CSOs and journalists is an important method to hold governments accountable for publishing high-quality BO data.

In order to help address these challenges, this evaluation recommends continued investment in activity areas 1, 2 and 3 to ensure the sustainability of the OE programme. Especially for countries earlier in the path towards compliance with EITI's Requirement 2.5, capacity building among government officials should be a clear priority of the programme. This is a challenge that the OE programme is very well placed to address, as technical assistance on BOT implementation and capacity building for data use are two core activity areas in the programme's implementation components.[16]

In countries that are publishing BO data, this evaluation recommends that the programme look to prioritise more long-term capacity-building efforts with CSOs and journalists. Along with continuous improvement of the quality of the data, in order to help address this gap. In these contexts, the OE programme could also consider supporting CSOs to conduct peer exchanges similarly to the effective peer exchanges that have already been conducted between governments as part of the programme.

Looking forward to Phase 2 and beyond

Opportunities for OE to 'double down'

The evaluation identified a number of existing areas of work where the Opening Extractives programme is proving particularly successful, which would benefit from further investment and strategic focus. These include:

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[15] Joining the Dots. "How did Joining the Dots come about?" https://peps.directoriolegislativo.org/nigeria/about#:~:text=The%20Opening%20Extractives%20Programme%20is,use%20of%20beneficial%20ownership%20data.

[16] EITI and Open Ownership (2020). "Opening Extractives: Programme Proposal," p 25.

1. **Efforts to put BOT on the agenda within a national extractives sector, even in areas where data is not yet being published.** This is particularly relevant to OE's work in Latin America, where we heard that the use of EITI multi-stakeholder groups (MSGs) had been valuable in getting government, mining companies, lawyers and anti-corruption stakeholders to talk about BOT in the extractives sector. It is clear, both from the findings of this evaluation, and the EITI's broader evaluative work, that the multi-stakeholder group is a valuable tool when looking to drive forward reform through dialogue and participation. The OE programme should ensure that it makes the most of this platform, by continuing to engage with MSGs and making sure OE activities are on their agendas.

    Though multiple interviewees highlighted this as an important contribution of this programme, there are plenty of outputs but probably no impacts yet tied directly to this work, uniting stakeholders in order to put BOT on the agenda within the extractives sector. However, interviewees saw this work as an important first step in securing stakeholder buy-in in order to begin to work towards more BOT reforms in the future. It is also an important step towards disclosing BO data, as illustrated in the OE programme implementation components.[17]

2. **Technical support, both in terms of facilitating data disclosure and changes to legislation.** This technical support, spearheaded by Open Ownership, was highlighted in interviews as the clear game-changer when it came to actually executing the political will garnered through EITIs multi-stakeholder approach. The OE programme should focus on this, particularly over the next 2.5 years.

3. **The programme and funder's 'agile' approach to prioritising workstreams**. It is clear that the BHP Foundation welcomes taking a flexible approach to the programme, particularly when it comes to deprioritising work in certain countries or changing the nature of activities where they are not having the desired impact due to factors outside the programme's control.

    We recommend that the programme make the most out of this flexibility in order to work towards impact as efficiently as possible, perhaps, for example, by establishing more frequent formal inflection points at which the funder and programme colleagues reflect upon priorities.

4. **The programme's use of local consultants** who are able to effectively build fruitful working relationships with government stakeholders in-situ, and make recommendations to the programme which are sensitive to realistic constraints.

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[17] EITI and Open Ownership (2020). "Opening Extractives: Programme Proposal," p 25.

Whilst we understand that programme-level staff working in multiple countries still need to travel to in-country events, this has the potential to be both time-consuming and costly. As such, the programme should continue to invest in the use of local consultants, working closely with country-leads to implement work plans on the ground. Using local consultants also allows the programme to respond to unexpected developments which require in-country capacity, which was evidenced during the COVID-19 pandemic, according to the OE annual report from 2021.[18]

Areas for course correction

We also identified a number of areas where we recommend that Opening Extractives 'course corrects' over the remaining 2.5 years of the programme. In this regard, we recommend that:

1. **Programme activities should focus on targeting and promoting compliance with EITI's Requirement 2.5. In line with this, the programme should consider reframing the goals of activity areas 3 and 4 to be specifically focussed on articulating the potential of data use.**

One way of achieving the prioritisation recommended above could be to target programme activities more closely around promoting compliance with EITI's Requirement 2.5, which is yet to be achieved across all focus countries.[19] In many contexts, this would mostly involve focusing on activity areas 1 and 2, given that most countries in the scope of the OE project have not yet achieved full implementation of an effective BOT register.

Data use and tooling (activity areas 3 and 4) are also vital to the success of BOT reform and the ultimate aim of the project, which is to improve the lives of citizens through more effective governance in the extractives sector. Data use is interconnected with activity areas 1 and 2 as it can be an important lever in generating political engagement with BOT reform, and an understanding of data users' needs is integral to designing effective technical assistance.

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[18] Opening Extractives (2021). "BHP Foundation Project Annual Report. Reporting Period: January - December 2021."

[19] Open Ownership (2023). "Opening Extractives country status progress evaluation: preliminary analysis for midpoint evaluation," p2, 4, 5.

In order for the programme to establish more targeted objectives, we recommend OE look to re-articulate the priorities for activity areas 3 and 4 to focus on generating examples which show the potential for data use, even in contexts where data quality, and hence data use capacity is currently low. For instance, in tandem with communications efforts (activity area 6), the programme should identify specific examples of data use which can be used to convince stakeholders of the benefits of BOT.

One way to achieve this could be to further invest in progress stories or data use stories, short blog-style pieces of content which demonstrate the citizen-facing benefits of reform in action. We know that Opening Extractives have already begun this process, commissioning progress stories on journalists' work with beneficial ownership data in Ghana, for example. Further investment into communicating the successes of data use, especially in countries with existing registers, could be an effective way of demonstrating data use potential even in other countries which are in the early stages or not yet publishing BO data, and on-the-ground work in activity areas 3 and 4 is limited.

2. **Invest in more direct peer exchanges with clear objectives, and less in large-scale webinars.**

In reference to activity area 5, multiple interviewees spoke about the importance of direct peer exchanges facilitated by OE as mentioned earlier in the report. A number of stakeholders involved in the programme, however, were sceptical about the impact of online events funded by the programme, such as webinars.

As such, we recommend that OE deprioritises its investment in webinars unless they have a specific objective or OE has identified a particular demand for an online event. When the OE programme does conduct online events, for example, the current ongoing global peer exchange, these online events should be used as the foundation to set up more direct, in-person exchanges among the participating countries.

3. **Further link global communications and advocacy work (activity area 6) to in-country activities through short briefs and other communications and advocacy materials tailored to granular, country-specific needs.**

The evaluation found that more needs to be done to connect one of OE's key activity areas, global communications and advocacy, with the work happening on the ground in-country. This reflects recommendations made at the end of the Year 1 annual report, which stated that OE work under activity area 6 "should be more

contextualised to reach or resonate with all stakeholder groups in all countries as intended."[20]

Interviewees working in-country expressed that they would benefit from communication, messaging, and advocacy work that responds to some of the granular and context-specific demands in their country. This could include, for example, short briefs which could help to address concerns about BOT and privacy for a public audience in Latin America, or communications materials tailored to government stakeholders that show the benefits of BOT for government cost savings or reducing corruption. Consultants and EITI national coordinators would also benefit from support with short briefs that would help them to educate the public about relevant aspects of BOT in their country.

4. **Create a more formal strategy for involving multilateral institutions in the programme, as adherence to their standards, and the potential funding opportunities this can bring is a strong incentive for governments to commit to reform.**

It is clear from the experience of the programme that the standards and incentives provided by the likes of FATF and the World Bank can be powerful levers for reform.

Whilst both EITI and OO have ongoing engagements with multiple multilateral institutions, the OE programme itself could benefit from taking a more strategic and prioritised approach to its engagement with these institutions.

We heard that using both the EITI Standard (in particular Requirement 2.5 on beneficial ownership), as well as FATF Recommendations, can be powerful incentives for the government to commit to BOT reform, particularly if they are seeking to be removed from FATF grey lists.[21]

Therefore, as the programme moves into its next phase, it should consider how it can further leverage the power of multilateral organisations and their standards to help build and sustain political will amongst government stakeholders.

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[20] EITI and Open Ownership (2021). "BHP Foundation Project Quarterly Update Report. Reporting period: January-March 2021," p.17.
[21] IN32.

Conclusion

Overall, Opening Extractives has made significant progress in its first phase. The programme's support has led to significant successes in Africa, in particular Liberia, Ghana, Nigeria, and Zambia. Even where the programme has encountered broader contextual challenges, such as difficulties in sustaining political will among some countries, a flexible approach to country prioritisation has allowed implementing teams to adapt the nature of their work (and its intensity), to best meet political and technical conditions.

As the programme enters into its next phase, we recommend that it defines more specific goals on the country-level. Having a more specific programme-level goal will aid in this process: we recommend that promoting compliance with EITI Requirement 2.5 should be one of the main focuses of the next phase.

Data use, capacity building and tooling are also key to success in driving the demand for beneficial ownership transparency and crucial to the programme's overarching aim of improving citizens' lives through better governance in the extractives sector.

In countries where beneficial ownership data is not yet publicly disclosed, or low data quality seriously impedes use, we recommend that OE prioritise highlighting specific potentials of data use and clearly communicating these examples. Meanwhile, in countries where data use and tooling are already possible, OE should focus on building a repository of progress stories, which will help to demonstrate the potential of BOT data.

Looking forward, beyond the timeline of the programme, there is clearly scope for another iteration of the programme, which focuses further on facilitating data use, once more countries have achieved the goal of publishing beneficial ownership data.