

Thursday, 17 October 2019

Dear Ms Green,

As requested, I am sending a compilation of comments made with regard to the following documents:

1. Preliminary Validation Report drawn up by the Independent Validator, Cowater Sogema, version translated into Spanish.
2. Report on the initial data gathering and stakeholder consultation, version translated into Spanish.

Below please find a literal copy of the comments made by Claudia González from the Ministry of Public Finances:

“Dear Mr. López,

These are our comments on the Validation Report for the EITI-Guatemala Report 2014-2015.

General considerations:

The results of the validation are generally negative.

Of the 24 requirements evaluated, 8 are recorded as showing Inadequate progress; 11 have Significant progress and 5 have Expected progress.

It does, however, provide useful guidance on what should be considered the plan to revive the EITI initiative in Guatemala and comply with the Standard.

1. The report seeks to validate information from the 2014-2015 reporting period; however, the comments are not limited to that period as they address the situation of the Multistakeholder group in 2018. We therefore feel the scope of the report is unclear.

The validation exercise was conducted in 2018 and sent at the end of 2019, on the basis of information gathered in 2016; it is therefore quite out of date.

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2. Various sections of the report's text emphasise that, given the decline in extractive activity, the country should reconsider how it participates in the EITI initiative; it could choose to "recalibrate" EITI implementation using mechanisms available in the Standard, for example, adapted implementation.

3. And more specifically:

- The right-hand margin needs justifying;
- On page 21, para 4, last line, the text refers to a word, "excuse" or something similar, which is missing;
- At the start of the fifth paragraph of page 21, when referring to the Stakeholders' Points of View, it has been drafted without any accuracy, without either identifying or referencing the Stakeholder who made the comments nor providing any chronological detail, and we therefore feel it is inadequately worded;
- On page 32, paragraph one, line five, "The procedure are not clear" is in the plural when it should be in the singular: "The procedure is not clear";
- The last paragraph of page 38 lacks accuracy in and chronological referencing of the comments made by the stakeholders. It should state which stakeholder made the comment and when, or at what meeting.
- On page 101 of the section on requirement no. 7.3 "Lessons learned and follow-up to recommendations", in the Initial Evaluation it indicates that the International Secretariat's initial evaluation considered that Guatemala had made significant progress in fulfilling the requirement; however, the evaluation table on page 106 states that progress is inadequate.
- The impact analysis (section 8) refers to corruption scandals relating to the ban on Iván Velásquez entering the country. We feel this is not directly related to EITI's impact in Guatemala and would request that it is removed from the text.

Please also correct the names on page 114:
Claudia González and Homero Avila."



In the same email, I also send you comments made by City Petén through their lawyer, Vanesa Rodas. These comments are taken directly from the PDF text of the document.

Thank you in advance for your interest. Please do not hesitate to contact me should you require any further information.

Kind regards,

Bernardo José López Rojas
EITI Guatemala