

# Validation of Suriname: Report on initial data collection and stakeholder consultation

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## Abbreviations

Apache	Apache Suriname Corporation LLC
APR	Annual Progress Report
ASM	Artisanal and Small-scale gold Mining
BIS	Bauxite Institute Suriname
Central Bank	Centrale Bank van Suriname
Citizen's Platform	Citizens' Initiative for Participation and Good Governance
CIT	Corporate Income Tax
CSO	Civil Society Organization
DNA	De Nationale Assemblee (The National Assembly)
EBS	N.V. Energie Bedrijven Suriname
GFS	Government Finance Statistics
GMD	Geologisch Mijnbouwkundige Dienst (Geological Mining Service)
Grasaalco	Grasshoper Aluminum Company Suriname NV LLC
IA	Independent Administrator
Iam Gold	Iam Gold Rosebel Gold Mines N.V
IOC	International Oil Companies
IS	EITI International Secretariat
ITPs	Indigenous and Tribal Peoples
JV	Joint Venture
MOF	Ministry of Finance
MONR	Ministry of Natural Resources
MORD	Ministry of Regional Development
MOTI	Ministry of Trade and Industry
Newmont	Newmont Suriname LLC
NS	EITI National Secretariat
NYSE	New York Stock Exchange
PSC	Production Sharing Contract
RGM	Rosebel Goldmines N.V
SCCI	Suriname Chamber of Commerce and Industry
SDT	Summary Data Template
SHMR	Small and Medium Size Companies
SOE	State-Owned Enterprise
SSF	Savings and Stabilization Fund
Staatsolie	Staatsolie Maatschappij Suriname N.V
Statistics Office	General Bureau of Statistics
Surgold	Suriname Gold Project C.V.
ToRs	Terms of Reference

## Executive summary

The Government of Suriname announced its commitment to join the EITI in February 2016 during the 7<sup>th</sup> EITI Global Conference in Lima and during a symposium on EITI in Suriname in April 2016.<sup>1</sup> A temporary Multi-Stakeholder Group (MSG) was set up in August 2016. A permanent MSG was appointed in October 2016. A candidature application was submitted on 24 March 2017<sup>2</sup> and approved by the EITI Board at its meeting on 24 May 2017<sup>3</sup>.

On 24 May 2017, the Board agreed that Suriname's Validation under the 2016 EITI Standard would commence on 24 October 2019. At its 46<sup>th</sup> meeting, the EITI Board concluded that Suriname was ineligible for an extension and its Validation started on 13 February 2020.<sup>4</sup> Given that the 2017 EITI Report was published in December 2019, Suriname is being validated under the 2016 EITI Standard. In May 2020, the Board agreed to extend the period for data collection until the 1 September 2020 due to the Covid-19 pandemic.<sup>5</sup>

This report presents the findings and initial assessment of the International Secretariat's data gathering and stakeholder consultations. The International Secretariat has followed the Validation procedure and applied the Validation Guide in assessing Suriname's progress with the EITI Standard. While the assessment has not yet been reviewed by the MSG, the Secretariat's preliminary assessment is that most of the requirements of the EITI Standard have not been fully addressed. Requirements related to the work plan (Requirement 1.5), license allocation (Requirement 2.2), register of licenses (Requirement 2.3), beneficial ownership (Requirement 2.5), social expenditures (Requirement 6.1), quasi-fiscal expenditures (Requirement 6.2), and outcomes and impact (Requirement 7.4) are unmet with inadequate or no progress. The 19 proposed corrective actions and a number of strategic recommendations identified through this process relate in particular to the work plan, licensing, social expenditures, and outcomes and impact.

## Overall conclusions

EITI implementation in Suriname has improved the availability and accessibility of data, as well as dialogue between stakeholders operating in the extractives sector. The civil society constituency has been fully and actively engaged in EITI implementation. However, there is room for improving the engagement of the government and industry constituencies in the process. EITI Reports publicly disclose data that is not systematically disclosed on government or company websites, in key areas of the extractive industries such as in-kind payments and the distribution of extractive revenues.

The EITI's impact in Suriname has been limited. The objectives in the latest work plan are focused on compliance with the EITI Standard, rather than on key areas for the government's policy on the extractive sector. The EITI could cover topics of national and local relevance related to, for example, the enhancement of transparency in the artisanal and small-scale mining sector and informing debate about the potential to restart the bauxite industry. EITI implementation provides an opportunity for the

<sup>1</sup> Agenda and presentations for the Symposium "EITI in Suriname: Moving towards implementation" where an official commitment to implement the EITI was announced by the Minister of Natural Resources, Mr Regilio Dodson.

<sup>2</sup> Letter from the Minister of Energy and Mines, Mr Regilio Dodson, expressing the intention of Suriname to be a EITI Candidate Country accessed on <https://eiti.org/document/suriname-letter-minister-dodson-to-international-secretariat> in March 2020. In addition, the Suriname Candidature Application Form accessed on <https://eiti.org/document/suriname-candidature-application> in March 2020.

<sup>3</sup> 37<sup>th</sup> EITI Board Minutes reflecting the Board admitting Suriname as an EITI candidate accessed on [https://eiti.org/files/documents/final\\_37th\\_eiti\\_board\\_meeting\\_minutes.pdf](https://eiti.org/files/documents/final_37th_eiti_board_meeting_minutes.pdf) in March 2020.

<sup>4</sup> 46<sup>th</sup> EITI Board Minutes reflecting the Board denying the extension of the first validation of Suriname accessed on <https://eiti.org/board-decision/2020-18> in March 2020.

<sup>5</sup> Board decision 2020-32/BC-290: <https://eiti.org/board-decision/2020-32>.

Government of Suriname to enhance investor confidence in the oil and gas sector and to engage with artisanal and small-scale mining companies in more depth. While the MSG's work has been process-oriented to date, the MSG could serve as a platform for discussing reforms in the sector.

Mining contract transparency and openness related to Staatsolie's transactions with the Government of Suriname facilitates further analysis. Public debate based on EITI data and findings has however been limited to date. The main challenge for the EITI in Suriname is to move from data disclosures to using the data as a basis for dialogue on reforms. Mining and, increasingly, oil and gas are priority sectors in Suriname, and the EITI has the potential to strengthen transparency and accountability in these sectors by improving systematic disclosures by government and companies and providing a platform for multi-stakeholder dialogue.

## Recommendations

The EITI International Secretariat's draft assessment proposes nineteen corrective actions that address gaps in compliance with the EITI Standard. Additionally, the Secretariat proposes some strategic recommendations to strengthen EITI implementation and its impact.

1. In accordance with **Requirement 1.1**, the government must be fully, actively and effectively engaged in the EITI process. The government should guarantee the participation of senior government representatives in MSG meetings assuring the government engagement is consistent across all government departments. The government is required to mobilise resources for EITI implementation entrenching EITI funding in government budgeting to ensure the sustainability of EITI implementation over the long term, to address the staffing and capacities challenges faced so far, and to guarantee the autonomy of Suriname EITI (EITI-SR). To further strengthen implementation of Requirement 1.1, the government is encouraged to embed the EITI in their national policies and make use of the data disclosed through the process. The government is also encouraged to ensure that government representatives on the MSG attend meetings regularly.
2. In accordance with **Requirement 1.2**, the industry should demonstrate that it is fully, actively and effectively engaged in the EITI process. Companies should review their engagement and work further in EITI implementation, ensuring that the objectives and activities of the process correspond to the priorities of wider industry constituency. Companies should also formalize and document their constituency coordination mechanisms and guarantee regular attendance at MSG meetings. To strengthen implementation of Requirement 1.2, the industry constituency of the MSG in Suriname is encouraged facilitate the publication of Beneficial Ownership information, as well as routine disclosures of data.
3. In accordance with **Requirement 1.4**, the MSG should ensure that the procedures for nominating its representatives are adequately codified and documented, and that there are established mechanisms for liaising with their broader constituencies, which are followed in practice. The MSG should ensure that deviations from their ToRs are recorded and transparent, and adequately and publicly codified. The MSG should ensure that its lack of per diem practice is publicly clarified. The MSG should guarantee there is sufficient advance notice of meetings and timely circulation of documents prior to their debate and proposed adoption, and that written records of its discussions and decisions are adequately kept through Minutes. Government and company constituencies are should to ensure that their representatives' attendance at MSG meetings is consistent and of sufficiently high level to allow the MSG to take decisions and follow up on them. To strengthen implementation of Requirement 1.4, the MSG is encouraged to re-orient its focus from the EITI reporting process to reforms in extractive sector governance. The MSG is encouraged to make use of the subcommittees (Article 3.2 of the MSG's ToRs) and invite

key government institutions that regulate the extractive sector such as the Central Bank to participate closely in EITI debate.

4. In accordance with **Requirement 1.5**, the MSG is required to agree on an updated, revised and fully costed work plan which reflects wide stakeholders' priorities for the extractive sector, and is organized through specific and measurable activities. The work plan should address the scope of EITI disclosures and follows-up of recommendations, as well as focus on issues like contract transparency and implementation of project level reporting. The MSG should ensure consultation on the work plan beyond MSG members. The MSG is encouraged to consider whether the EITI process could contribute in addressing broader issues related to the extractive activities in Suriname, such as free and informed prior consent for the mining projects.
5. In accordance with **Requirement 2.2**, Suriname should ensure that comprehensive information about the recipients of mining, oil and gas licenses awarded and transferred in the year(s) under review are publicly accessible, alongside a description of the actual allocation and transfer process including the roles of relevant government entities and technical and financial criteria assessed (and weightings if applicable), and any non-trivial deviations from statutory procedures in practice. Where licenses are awarded through a bidding process, the government is required to disclose the list of applicants and the bid criteria. Suriname may also wish to comment on the efficiency of the current license allocation and transfer system as a means of clarifying procedures and curbing non-trivial deviations.
6. In accordance with **Requirement 2.3**, Suriname should maintain a publicly available register or cadastre system with timely and comprehensive information on all mining, oil and gas licenses including license-holder name, dates of application, award and expiry, commodity(ies) covered and coordinates. The MSG should work with the MONR, GMD and Staatsolie to ensure all license information listed in Requirement 2.3.b is available for all extractives licenses active in the period under review.
7. To meet the **Requirement 2.4**, Suriname must document the government's policy on disclosure of contracts and licenses that govern the exploration and exploitation of oil, gas and minerals. This should include relevant legal provisions, actual disclosure practices and any reforms that are planned or underway. An overview of the contracts and licenses that are publicly available should be disclosed in the public domain and include a reference or link to the location where these are published. Suriname is encouraged to publish PSCs currently in force with relevant annexes, and to undertake a review of published mining and oil contracts ensuring that the published contracts are available in a centralized website which should be regularly updated. In accordance with Requirement 2.4.a, Suriname is required to disclose any contracts and licenses that are granted, entered into or amended from 1 January 2021
8. In accordance with **Requirement 2.5** and the Board-agreed framework for assessing progress, Suriname is required to disclose the beneficial owners of all companies holding or applying for extractive licenses by 31 December 2021. To achieve this target, the following measures are recommended:
  - i. Suriname is requested to agree an appropriate definition for the terms "beneficial owner" and "politically exposed person".
  - ii. Suriname is expected to request all companies holding oil, gas and mining licenses to disclose BO information and provide adequate assurances for data reliability. The government is encouraged to establish a public register of beneficial owners which could be integrated into the Trade Register managed by the SCCI.
  - iii. Suriname is encouraged to require all applicants of oil, gas and mining licenses to disclose their beneficial owners at the application stage. An assessment of the comprehensiveness and reliability of this information should be integrated into the licensing procedures followed by the MONR and Staatsolie.



- iv. Suriname is encouraged to agree priorities for BO disclosures and, based on these priorities, plan efforts to obtain this data. For example, Suriname may prioritise disclosures by certain types of companies holding a certain type of license or producing a certain commodity due to risks related to corruption or tax evasion. These priorities should guide outreach efforts to companies and provide them guidance.
  - v. It is recommended that Suriname considers using the EITI's model BO declaration form to ensure that disclosures are published in open data format, comparable and easy to analyse.
  - vi. Suriname may also wish to expand BO disclosures to other segments of the upstream extractive value chain, for instance through collection and disclosure of BO information from extractive-sector service providers to improve the public debate.
9. In accordance with **Requirement 2.6.a**, Suriname should ensure that a comprehensive overview of Grassalco is publicly disclosed, including an explanation of the prevailing rules and practices related to Grassalco's retained earnings, reinvestment and third-party funding. The government should also ensure annual disclosure of a comprehensive account of any loans or loan guarantees extended by the state or Grassalco to mining, oil, and gas companies in line with Requirement 2.6.b. The terms of Staatsolie's participation in the Merian Gold Mine should be comprehensively disclosed. Suriname is required to clarify whether NV1 is a government-owned corporation, and whether it is a material state-owned enterprise.
  10. In accordance with **Requirement 4.1**, Suriname should demonstrate that all material payments and revenues are comprehensively disclosed by government entities and extractive companies. In addition, Suriname should guarantee that any material omissions should be disclosed, and the non-reporting entities named. Suriname must assess whether gold exporters should be considered as material companies ahead of future EITI reporting.
  11. In accordance with **Requirement 4.2**, the MSG should agree whether the sale of the state's share of production or other revenues collected in kind is material. Suriname is required to disclose the volumes sold and revenues received, disaggregated by individual company and to levels commensurate with the reporting of other payments and revenue streams. Reporting could also break down disclosures by the type of product, price, market and sale volume. The MSG is encouraged to task the IA with reconciling the volumes sold and revenues received by including the buying companies in the reporting process.
  12. In accordance with **Requirement 4.5**, Suriname must ensure that the EITI reporting process comprehensively includes material payments to SOEs from oil, gas and mining companies, and transfers between SOEs and other government agencies. In particular, Suriname should ensure that all material dividends collected by SOEs such as Staatsolie from extractive companies such as Surgold JV be comprehensively and reliably disclosed.
  13. In accordance with **Requirement 4.9**, Suriname should ensure that future EITI Reports include a clear assessment of the IA on the comprehensiveness and data reliability. The MSG must clearly agree what assurances should be provided by the MOF, and later assess the compliance with the assurance agreed. The MSG is encouraged to document the audit policy and practice of the MOF.
  14. In accordance with **Requirement 6.1**, Suriname should ensure that a clear definition of any mandatory social expenditures mandated by law or contract is publicly provided and assess the materiality of such expenditures in the period under review. Suriname may wish to consider the extent to which disclosure of PSCs would be necessary to provide a comprehensive overview of all mandatory social expenditures in the oil sector. Suriname should ensure that public disclosure of mandatory social expenditures be disaggregated by type of payment (distinguishing cash and in-kind) and beneficiary, clarifying the name and function of any non-government (third-party) beneficiaries of mandatory social expenditures.





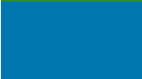




15. In accordance with **Requirement 6.2**, Suriname should undertake a comprehensive review of all expenditures undertaken by extractives SOEs that could be considered quasi-fiscal expenditures. Suriname should develop a reporting process for quasi-fiscal expenditures with a view to achieving a level of transparency commensurate with other payments and revenue streams.
16. In accordance with **Requirement 6.3**, Suriname should disclose employment in the extractive industries in absolute terms and as a percentage of the total employment. Given the importance of artisanal mining for Suriname's economy, Suriname should also provide estimates of informal extractive activities, including artisanal and small-scale mining, in future EITI reporting.
17. In accordance with **Requirement 7.1**, Suriname should ensure that EITI reports are comprehensible, actively promoted, publicly accessible and contribute to public debate. Suriname should ensure timely communication of EITI data and findings, as well as effective outreach to key stakeholders. Outreach events should be undertaken to spread awareness of and facilitate dialogue about EITI disclosures across the country. EITI-SR should adopt an open data policy and ensure that EITI data is available in open format. To strengthen implementation, the MSG may wish to consider linking a clear EITI-SR communications strategy more closely to the work plan and tailoring key messages to sector priorities rather than to EITI implementation more broadly. Suriname is encouraged to explore creative ways to strengthen the EITI's contribution to public debate and engage with the communities in the hinterland where extractive activities take place. It is recommended that Suriname updates the EITI-SR website
18. In accordance with **Requirement 7.3**, Suriname is required to take steps to act upon lessons learnt with a view to strengthen the impact of EITI implementation on natural resource governance. In particular, Suriname should consider improving its procedures to analyse and follow-up on the recommendations resulting from EITI reporting making use of tools established in its own ToRs such as the subcommittees.
19. In accordance with **Requirement 7.4**, Suriname is required to review the outcomes and impact of EITI implementation on natural resource governance. Suriname should ensure that all stakeholders are able to participate in the production of the annual progress report and review the impact of EITI implementation. Stakeholders beyond the MSG should be able to provide feedback on the EITI process and have their views reflected in the annual progress report. The MSG should ensure that an assessment of progress with achieving the objectives set out in its work plan is carried out, including the impact and outcomes of the stated objectives. The MSG may wish to also ensure that the APR, the MSG's action plan and any other management tools are used to feed into the annual work plans.

FIGURE 1– INITIAL ASSESSMENT CARD

EITI Requirements		Level of progress				
Suriname Validation scorecard		No progress	Inadequate	Meaningful	Satisfactory	Outstanding
Categories	Requirements					
MSG oversight	Government engagement (#1.1)					
	Industry engagement (#1.2)					
	Civil society engagement (#1.3)					
	MSG group (#1.4)					
	Work plan (#1.5)					
Licenses and contracts	Legal framework and fiscal regime (#2.1)					
	License allocations (#2.2)					
	Register of licenses (#2.3)					
	Policy on contract disclosure (#2.4)					
	Beneficial ownership (#2.5)					
	State participation (#2.6)					
Monitoring production	Exploration (#3.1)					
	Production (#3.2)					
	Exports (#3.3)					
Revenue collection	Comprehensiveness (#4.1)					
	In-kind revenues (#4.2)					
	Barter agreements (#4.3)					
	Transportation revenues (#4.4)					
	SOE transactions (#4.5)					
	Direct subnational payments (#4.6)					
	Disaggregation (#4.7)					
	Data timeliness (#4.8)					
	Data quality and assurance (#4.9)					
Revenue allocation	Distribution of revenues (#5.1)					
	Subnational transfers (#5.2)					
	Revenue management & expenditures (#5.3)					
Socio-economic contribution	Social expenditures (#6.1)					
	SOE quasi-fiscal expenditures (#6.2)					
	Economic contribution (#6.3)					
Outcomes and impact	Public debate (#7.1)					
	Data accessibility and open data (#7.2)					
	Recommendations from EITI (#7.3)					
	Outcomes & impact (#7.4)					

*Legend to the assessment card*

	<b>No progress.</b> The country has made no progress in addressing the requirement. The broader objective of the requirement is in no way fulfilled.
	<b>Inadequate progress.</b> The country has made inadequate progress in meeting the requirement. Significant elements of the requirement are outstanding, and the broader objective of the requirement is far from being fulfilled.
	<b>Meaningful progress.</b> The country has made progress in meeting the requirement. Significant elements of the requirement are being implemented and the broader objective of the requirement is being fulfilled.
	<b>Satisfactory progress.</b> All aspects of the requirement have been implemented and the broader objective of the requirement has been fulfilled.
	<b>Outstanding.</b> The country has gone beyond the requirement.
	This requirement is only encouraged or recommended and should not be taken into account in assessing compliance.
	The MSG has demonstrated that this requirement is not applicable in the country.

## Introduction

### Brief recap of the sign-up phase

Suriname announced its commitment to join the EITI in February 2016 during the 7<sup>th</sup> Global Conference of the EITI in Lima, and later, during the symposium ‘EITI in Suriname: Moving towards implementation’ in April 2016. In the same month, the former Minister of Natural Resources, Mr Regilio Dodson, was nominated to lead the process. In October 2016, the MSG was established. A National Coordinator was appointed in September 2016.<sup>6</sup> A candidature application was submitted on 24 March 2017 and approved by the EITI Board at its meeting on 24 May 2017.

### Objectives for implementation and overall progress in implementing the work plan

The MSG has defined as the main strategic objective for EITI-SR to mainstream EITI implementation within government systems and to prepare in a timely manner the 2<sup>nd</sup> and 3<sup>rd</sup> EITI Reports covering 2017 and 2018, respectively. The 2019-2020 work plan includes the following objectives for implementation: to disseminate key information from EITI Reports creating public debate regarding natural resources governance in Suriname; to implement the Beneficial Ownership (BO) Roadmap; and to expand the reporting scope including construction materials and new 2019 EITI Standard disclosures<sup>7</sup>.

### History of EITI reporting

Suriname has published two EITI Reports covering fiscal years 2016 and 2017, respectively. This Initial Assessment is based on the 2017 EITI Report (referred to here as the “EITI Report”). The 2017 EITI Report was published in December 2019. Therefore, Suriname is being validated under the 2016 EITI Standard, in accordance with the Board-approved transitional arrangements. Both the contextual section and the reconciliation were undertaken by BDO, the Independent Administrator (IA).

### Summary of engagement by government, civil society and industry

The Government of Suriname made a public commitment to join the EITI and appointed the Minister of Natural Resources as the Champion early 2016. Later that year, the EITI-SR started operating, and was formally confirmed by State resolution dated 1 December 2016.<sup>8</sup> The MSG’s composition was determined to include nine full members and nine corresponding alternates, with a third of the representation being assigned to each constituency. The MSG’s structure has allowed for an adequate

<sup>6</sup> Initially, in September 2016, Dave Abeleven, permanent Secretary of the MONR, was appointed as the National Coordinator, and he would also chair those meetings in which the Minister was not able to attend. Once the Bauxite Institute was appointed to accommodate the NS in 2017, Mrs. Nathalie Lui, who was working at the institute, was designated as National Coordinator. Finally, once the Bauxite Institute stopped hosting the NS, Dave Abeleven was re-appointed as Coordinator, and the NS was transferred back to the MONR.

<sup>7</sup> EITI Suriname (EITI-SR) Work Plan. 30 June 2019 – 31 December 2020 accessed on [https://eitisuriname.org/wp-content/uploads/2020/01/MSG\\_Workplan\\_2019\\_2020.pdf](https://eitisuriname.org/wp-content/uploads/2020/01/MSG_Workplan_2019_2020.pdf) on March 2020.

<sup>8</sup> See Annexes to Suriname’s candidature application: [https://eiti.org/files/documents/annexes\\_to\\_suriname\\_candidature\\_application.pdf](https://eiti.org/files/documents/annexes_to_suriname_candidature_application.pdf) (last consulted 5 December 2020)

representation of the different stakeholders involved in Suriname's extractive sector. The MSG has, on average, met once a month since the beginning of the process, and has been in charge of preparing the EITI work plans, drafting the Terms of Reference (ToRs) for the IA, and reviewing and approving the EITI Reports, as well as other dissemination material prepared by EITI-SR.

While the civil society constituency has been fully and actively engaged in EITI implementation, there is room for improving the engagement from the government and industry constituencies' in the process. Civil society engagement has been organised through a wider platform called the 'Citizens Initiative for Participation and Good Governance', which has enabled them to communicate fluently with other Civil Society Organizations (CSOs) outside the MSG. The industry's participation has been organised through sub-groups representing the oil and gas companies, the large mining companies and the small and medium-sized mining companies. The government has assigned four ministries to participate in the MSG, with the Ministry of Natural Resources (MONR) taking the lead by appointing the Champion and hosting the national secretariat. The other three ministries participating are the Ministry of Finance (MOF), the Ministry of Regional Development (MORD) and the Ministry of Trade and Industry (MOTI). Additional details on MSG members' meeting attendance is provided in Annex B.

## Key features of the extractive industry

The economy of Suriname relies on extractive industries and agriculture. Suriname was ranked as the world's most mining-dependent country in the latest ICMM Mining Contribution Index 2018.<sup>9</sup> This is explained by a rise in production value, combined with the contraction of the economy overall since 2014. Suriname's population is only about 0.6m, which underlines the significance of natural resources to the economy, despite relatively modest production volumes and values. The country is well-known for its abundant natural resources, primarily gold and crude oil. Suriname had a prosperous bauxite industry for decades. The main company Suriname Aluminum Company however shut its aluminium smelter in 1999 and in 2015, alumina production in the refinery was stopped. Currently, the gold industry has surpassed the bauxite/alumina industry in Suriname. Gold is an essential export good for the country making up approximately three-quarters of its exports by value in 2017.<sup>10</sup> There are two large scale mining companies operating in Suriname: Newmont Suriname LLC (Newmont), and Iam Gold Rosebel Gold Mines N.V (Iam Gold) which operates the Rosebel Gold mine together with the Government of Suriname, and the Merian Gold Project, respectively. The Artisanal and Small-scale gold Mining (ASM) plays an important role in Suriname with approximately 12,000 to 15,000 miners operating in the country including service providers.<sup>11</sup> In 2014, ASM production represented 65.4% of total gold production in the country.<sup>12</sup> Suriname had only onshore oil production at the moment of writing this assessment. Apache Suriname Corporation LLC (Apache) and Total however recently made the first-ever offshore discovery for Suriname.<sup>13</sup> Refined petroleum represented 5% of total exports in 2017.<sup>14</sup> Staatsolie Maatschappij Suriname N.V (Staatsolie), a

<sup>9</sup> International Council on Mining & Metals (2018). Role of Mining in National Economies. Mining Contribution Index 2018. 4<sup>th</sup> Edition. [https://www.icmm.com/website/publications/pdfs/social-and-economic-development/181002\\_mci\\_4th-edition.pdf](https://www.icmm.com/website/publications/pdfs/social-and-economic-development/181002_mci_4th-edition.pdf) (last accessed on 14th October 2020).

<sup>10</sup> Observatory for Economic Complexity (OEC). (2020) "Suriname" <https://oec.world/en/profile/country/sur/> (last accessed on 04 March 2020).

<sup>11</sup> The World Bank. (2019) "Suriname Competitiveness and Sector Diversification Project (SCSD) Rapid Social Assessment". <http://documents.worldbank.org/curated/en/473361549897914424/pdf/Rapid-Social-Assessment.pdf> (last accessed on 04 March 2020).

<sup>12</sup> Idem

<sup>13</sup> Oil Price. (2020) "How Important Is The Suriname Oil Discovery?" <https://oilprice.com/Energy/Oil-Prices/How-Important-Is-The-Suriname-Oil-Discovery.html> (last accessed on 04 March 2020).

<sup>14</sup> Observatory for Economic Complexity (OEC). (2020).

vertically integrated state-owned company explores, drills, produces, refines, markets, sells and transports petroleum in Suriname.

## Explanation of the Validation process

Validation is an essential feature of the EITI implementation process. It is intended to provide all stakeholders with an impartial assessment of whether EITI implementation in a country is consistent with the provisions of the EITI Standard. It also addresses the impact of the EITI, the implementation of activities encouraged by the EITI Standard, lessons learnt in EITI implementation, as well as any concerns stakeholders have expressed and recommendations for future implementation of the EITI.

The Validation process is outlined in chapter 4 of the EITI Standard.<sup>15</sup> It has four phases:

1. Preparation for Validation by the MSG
2. Initial data collection and stakeholder consultation undertaken by the EITI International Secretariat.
3. Independent quality assurance by an independent Validator who reports directly the EITI Board
4. Board review

The [Validation Guide](#) provides detailed guidance on assessing EITI Requirements, and more detailed [Validation procedures](#), including a standardised procedure for data collection and stakeholder consultation by the EITI International Secretariat and standardised ToRs for the Validator.

The Validation Guide includes a provision that: “Where the MSG wishes that validation pays particular attention to assessing certain objectives or activities in accordance with the MSG work plan, these should be outlined upon the request of the MSG”. The Suriname EITI MSG did not request any issues for particular consideration.

In accordance with the Validation procedures, the EITI International Secretariat’s work on the initial data collection and stakeholder consultation was conducted in three phases:

### 1. Desk Review

Prior to undertake remote stakeholder consultations, the EITI International Secretariat conducted a detailed desk review of the available documentation relating to the country’s compliance with the EITI Standard, including but not limited to:

- The 2019-2020 EITI work plan and 2018-2019 EITI work plan;
- The MSG’s Terms of Reference, and minutes available from MSG meetings;
- EITI Reports, and supplementary information such as summary reports;
- Communication materials;
- Annual progress reports; and
- Any other information of relevance to Validation.

In accordance with the Validation procedures, the Secretariat has not taken into account actions undertaken after the commencement of Validation.

<sup>15</sup> See also <https://eiti.org/validation>.

## 2. Country visit

Remote stakeholder consultations took place from the 08 October to 02 December 2020. The International Secretariat met virtually with the MSG and its members, the IA and other key stakeholders, including stakeholder groups that are represented on, but not directly participating in, the MSG. In addition to meeting virtually with the MSG as a group, the International Secretariat met with its constituent parts (government, companies and civil society) either individually or in constituency groups, with appropriate protocols to ensure that stakeholders are able to freely express their views and that requests for confidentiality are respected. The list of stakeholders consulted is outlined in Annex D.

## 3. Reporting on progress against requirements

This report provides the EITI International Secretariat initial assessment of progress against requirements in accordance with the Validation Guide. It does not include an overall assessment of compliance.

The EITI International Secretariat's team comprised Jaqueline Taquiri and Catherine Greene. Quality assurance was provided by Alex Gordy, Lydia Kilpi and Francisco Paris.



## Part I – Effectiveness and impact of EITI implementation

### Impact and effectiveness

*Implementation objectives linked to national priorities:* The objectives in the EITI-SR 2019-2020 work plan are focused on compliance with the EITI Standard, rather than on priority areas in the government's policy on the extractive sector, such as the improvement of transparency from the artisanal and small-scale mining sector, the supervision and monitoring of the rehabilitation process of the ALCOA mines<sup>16</sup>, the diversification of the economy including revamping the bauxite industry, and the attraction of foreign investment for the offshore oil sector. In practice, the links between EITI implementation and reforms have been limited and weak. The Government of Suriname does not appear to have consulted the MSG when revising its outdated Mining Code, the 1986 Mining Decree, nor when the 2017 Saving and Stabilisation Fund was drafted even when this policy instrument is key as it is designed to receive important extractive revenues from mining and oil operations in Suriname. The establishment of the Minerals Institute, however, seems to have been discussed by the MSG albeit in a limited way. The MSG has not been employed fully as a platform for debate and dialogue about the governance of the extractive sector.

*Impact of EITI:* So far, the EITI's impact in Suriname has been limited. EITI has contributed to bringing together stakeholders and extractives data. The EITI Reports have filled in disclosure gaps within government sites regarding key areas in the extractive sector. For example, EITI Reports are the only source of available data related to in-kind mineral royalty payments from Rosebel Goldmines N.V (RGM) to Grasshopper Aluminum Company Suriname NV LLC (Grassalco). The lack of updated and publicly available Annual Reports from Grassalco makes these disclosures meaningful. In addition, EITI reporting includes aggregated information about mineral royalties paid by small-scale mining operations. Nonetheless, despite the existence of relevant EITI disclosures, the data is hardly used. Motivated by license register provisions of the EITI, the MONR has launched an online registration for the application for mining rights in Suriname aimed at improving transparency of the license allocation in the mining sector. The EITI process has motivated government agencies to overcome challenges regarding royalty payments made by gold exporters and to get them involved within the EITI process to improve mineral royalty transparency in Suriname. EITI implementation in Suriname has led Staatsolie to commit to make Production Sharing Contracts (PSCs) publicly available.

*Prospects for greater EITI impact:* EITI implementation is an opportunity for the Surinamese government to boost oil investors' confidence and to engage with ASM companies. Apache and Total recently announced the discovery of significant oil deposits offshore, which means that Suriname could play a key role in the oil sector in the coming years. The EITI could inform public debate about expected oil revenues and the potential effect of a global transition to fossil-free energy. In August 2020, President Chandrikapersad Santokhi noted that the 2017 Savings and Stabilisation Fund Law must be made operational in the short-term providing an important tool for a sustainable, inclusive and diversified growth in Suriname<sup>17</sup>. There is an opportunity for the EITI to be used as a tool to increase transparency regarding the resources flowing to the Stabilisation Fund, and its management.

<sup>16</sup> The Minister for Natural Resources, David Abiamfo, installed the 'ALCOA Mines Rehabilitation Committee', which is charged with supervising and monitoring the rehabilitation process of the ALCOA mines. <http://naturalresources.gov.sr/actueel/2020/commissie-rehabilitatie-alcoa-mijnen-geïnstalleerd/> (last accessed on 14 December 2020)

<sup>17</sup> Dwtonline.com <http://www.dwtonline.com/laatste-nieuws/2020/08/08/ingezonden-spaar-en-stabilisatiefonds-suriname-of-een-echt-welvaartsfonds/> (last accessed on 14 December 2020)

Small-scale mining operations are an integral part of the mining sector in Suriname as well as domestic companies supplying goods and services to these operations. ASM is strongly linked to the use of mercury which in turn is associated with negative environmental impacts in Suriname. Given that there are no agencies holding small-scale mining data, the EITI can be used as a platform to disclose this information, especially regarding environmental and health protection, and to convene discussions that could leverage its potential for positive economic impact. Industrial-scale gold mining continues to develop in Suriname. The government concluded and published agreements with two large gold mining companies, Iam Gold, and Newmont. EITI-SR may wish to analyse the fiscal regimes agreed for the two mining projects to identify risks of revenue loss through, for example, harmful tax incentives. Disclosure of existing PSCs by Staatsolie would enable further analysis in the offshore oil sector. The public disclosure of beneficial owners of extractive companies through a public register would allow better understanding of the Suriname participation in the extractive sector, in particular of those involved in small-scale mining operations and could facilitate addressing corruption and tax evasion risks. There is also further potential to link the EITI to addressing local concerns regarding the benefits and impact of mining.

*Innovations beyond EITI Requirements:* The MSG has sought to deepen the comprehensiveness of the EITI Reports exploring further work with the Central Bank. The Central Bank is as a key provider of extractives data including payments of royalties by small-scale gold exporters, exports data, and revenues from the sales of gold received from RGM by Grassalco.

*Conclusions, lessons learnt and recommendations:* Given the significance of the large-scale mining sector, the predominant small-scale mining sector, and the imminent offshore oil production, the EITI-SR should ensure it is used to address issues of relevance for these sectors. Suriname's EITI implementation has focused on efforts to produce EITI Reports in a timely manner and to secure funding for this. With a new government in place, Suriname has the opportunity to ensure that EITI responds to national and local priorities. Stakeholders may wish to consider innovative ways to reduce reporting costs by exploring opportunities to mainstream EITI disclosures through government and company systems.

The International Secretariat has identified the following opportunities to disclose data routinely:

- The MONR and related mining government agencies could disclose production and export values and volumes disaggregated by commodity on its website.
- The Central Bank might consider disclosing the list of gold exporters in Suriname including those buying gold from small-scale miners, and the revenues from the sales of gold received from RGM by Grassalco. The publication of gold exporters might inform the debate regarding the main role that gold exporters play in the contribution to the economy. In addition, the systematic publication of the revenues from the sales of gold received from RGM by Grassalco will fill up an important gap where a timely publication of Grassalco's annual report is lacking.
- Staatsolie could disclose key information about oil and gas licenses on its website, as specified under Requirement 2.3. This will provide more clarity on property rights in a sector that is attracting increasing investor interest given recent discoveries.
- Staatsolie could disclose PSCs in a timely manner. This will allow Suriname citizens to understand the agreed terms for extractive projects in Suriname, to check that every party is following them and to determine who is accountable for non-compliance.
- Grassalco could disclose comprehensive information about its financial relationship with the government on its website and/or through annual reports in a timely manner. While there is no evidence of Grassalco generating a significant revenue for the Government of Suriname, Grassalco might enable the government to exercise greater control over the mining sector, but also might help improving local technologies and skills, or addressing market failures by

providing services that would not otherwise be provided by the private sector. Thus, transparency regarding the relationship between Grassalco and the Government of Suriname is key.

- The government could mandate the Suriname Chamber of Commerce and Industry to disclose beneficial owners holding extractive licenses by integrating this data into the Trade Register. Beneficial Ownership data will enable Suriname to expose corruption or tax evasion practices in the extractive sector. In addition, it will ensure honest companies that there is a level playing field for all extractive companies allowing them to know who they are doing business with.

## Sustainability

*Funding:* Access to adequate funding has not been a significant obstacle to effective EITI implementation in Suriname. From the beginning, there has been significant support from the World Bank through a grant and going forward it will be covered by a World Bank policy-based loan which is expected to last for five years. The government has not provided additional funding. The national secretariat is housed in the MONR and its operating costs and salaries are covered by the government. Staff serves partially in the national secretariat with additional roles in the MONR (see *Requirement 1.5*). Suriname's dependence on donor funding to date, and no further commitments from government might be a challenge for the sustainability of the EITI implementation process in the future. A development partner consulted confirmed availability of funds for the coming years and signalled the EITI as good tool for supporting reforms on priority areas such as the communication of EITI data to communities, and the enhancement of the mining cadastre. For this to happen the EITI platform should serve for meaningful discussions.

*Institutionalisation:* The change of government in July 2020 did not represent a challenge for EITI implementation process. To improve the sustainability of EITI implementation, Suriname is encouraged to allocate funds to hire full time secretariat staff that would enable it to follow up on opportunities for systematic disclosures and engage with government agencies and companies. Suriname might also consider institutionalising the EITI through relevant legislation.

## Part II – MSG Oversight

### 1. Oversight of the EITI process: Requirement 1

The government participates in the MSG and actively contributes to EITI reporting, but its engagement in the overall process could be more dynamic and consistent. The strong initial commitment of the Government of Suriname to EITI has weakened throughout implementation since the country became an EITI candidate 2017. Current identified gaps include: the absence of some government officials in scheduled MSG meetings, the lack of full time staff devoted to the work of the national secretariat (NS), the failure to submit the summary for the 2017 EITI Report on a timely manner, the poor communication efforts besides the launching of the EITI Reports, and the lack of wider engagement with government actors regarding the EITI process.

*Public Statement and Senior Lead:* The Government of Suriname first committed to implement the EITI in February 2016, and, later in April 2016, former Minister of Natural Resource, Mr Regilio Dodson, declared his commitment to EITI implementation<sup>18</sup>. The government has appointed a senior individual to lead on the implementation of the EITI.

*Active engagement:* The government has three seats at the MSG, together with the corresponding three alternates, as well as the chairing position, which has been held by the MONR. Meeting minutes show that government representatives have an active participation in discussions, though this is not even through all representatives. Besides the involvement of the MONR, Suriname's EITI MSG also counts with the participation of several other government representatives who hold senior positions in their respective ministries: the MOF, the MORD and the MOTI. The MONR tends to be the one most engaged in the MSG meetings, while the attendance of the representatives from the MOF, MORD and MOTI is not as consistent.<sup>19</sup> Regarding dissemination efforts, the government has been involved by having the participation of former EITI Chair (Minister of Natural Resources: Mr Sergio Akiemboto), the former National Coordinator (member of the MONR, Dave Abeleven) and parliamentarians during the launching events of the first and the second EITI Reports. The government also contributed in producing paper copies of the EITI Reports and sharing a wide variety of EITI-related data within the MONR website.<sup>20</sup> Despite these dissemination efforts, and even though the 2017 EITI Report confirms full government participation in EITI reporting (see *Requirement 4.1*), there is no further mention of EITI in any wider government policies or in statements of high-ranking officials. EITI implementation has neither been discussed in Parliament, and most of its members are not aware of the process in Suriname. Along these lines, there is very limited evidence on the use of EITI data by government agencies or the parliament members, and most of the references have been mainly anecdotal.<sup>21</sup> The 2019-2020 work plan revealed that the government has not been providing adequate funding for EITI implementation in Suriname. The resources allocated for the process so far have been secured by the

<sup>18</sup> Announcement of commitment to join the EITI in the 7th EITI Global Conference (February 2016) and in the Symposium 'EITI in Suriname: Moving towards implementation' (April 2016): [https://www.youtube.com/watch?v=iY9m2YHCvNw&feature=youtu.be&ab\\_channel=MinisterievanNatuurlijkeHulpbronnen](https://www.youtube.com/watch?v=iY9m2YHCvNw&feature=youtu.be&ab_channel=MinisterievanNatuurlijkeHulpbronnen) and Workshops held with Trinidad & Tobago for preparing candidature (2016): <http://www.tteiti.org.tt/wp-content/uploads/Activity-Report-2016.pdf>

<sup>19</sup> Between 2017 and 2019, there were three meetings that were not attended by any representative from government, while in other cases it was only the alternate representative who joined. More concretely, in 2020, 4 out of the 6 representatives went only to 1 of the 4 MSG meetings held so far, while in 2019, 3 representatives only assisted to less than 15% of the meetings. Similarly, in 2018 half of the government representatives attended only 25% of the meetings, and in 2017, 4 of them went to less than 15 meetings out of the 31 held in total.

<sup>20</sup> See MONR's website: <http://naturalresources.gov.sr/zoekresultaten/?search=eiti>

<sup>21</sup> The National Statistics Agency mentioned that on some occasions they have used the EITI reports to complement to their own disclosures on information regarding the extractive sector.

World Bank. The costs related to the functioning of the NS have been covered by the government, which hosts the NS in the MONR and has allocated an average of two to three part time staff working in the NS for EITI implementation.

## Stakeholder views

Several stakeholders confirmed the commitment from high-level government officials, particularly during the previous administration, clarifying that the current still needs to get acquainted with the EITI process in Suriname. Stakeholders emphasized their confidence in the EITI Champion, with broad agreement on the Minister of Natural Resources being appropriate for this position. Along these lines they added that the NC was a senior government official under the former administration, which also helped in giving relevance to the process. Despite this, some stakeholders expressed concerns regarding the seniority of other government representatives on the MSG, noting that those from other Ministries besides the MONR tended to be junior or new to the administration. Stakeholders seemed to be comfortable with the government agencies that are represented in the MSG.<sup>22</sup> Some said that government representatives are quite engaged, while others noted that full commitment is not consistent across government agencies. In this sense, some of the consulted stakeholders made a distinction between those representatives from the MOF and the MONR, who are more engaged, and those from the MORD and the MOTI who are less active in the EITI process.

Funding for implementation was raised by stakeholders from different constituencies as an issue of concern. The fact that the government is not providing funding for EITI beyond the operational costs of the MSG and functioning of the NS, was highlighted by some as a challenge for the sustainability of Suriname's EITI implementation. The issue of funding has been a concern for various MSG members from CSOs and companies, who in September 2020, sent a letter to the current Minister of Natural Resources and EITI Champion, David Abiamfofo, expressing their concerns and requesting information on the possible changes in staffing of the NS.

Several stakeholders, including some from government, highlighted that the NS has been understaffed, and in many cases, staff ends up performing two roles: one related to the EITI and one in connection to their official position in the MONR (in average, there tend to be two to three people working part time at the NS). During consultations there was a reference to a possible plan of relocating the NS within the MONR structure, to grant it a more senior position in the organigram. Even though this change was said to be approved by the Ministry already, no formal documentation was provided to the International Secretariat (IS) on the matter. A few MSG members mentioned that in a few occasions the government does not engage openly in the debates. They explained that there have been occasions in which the government has tried to set the agenda for discussion, limiting it only to the topics relevant for them, and not engaging in the issues raised by stakeholders from other constituencies.

## Initial assessment

The International Secretariat's initial assessment is that Suriname has made meaningful progress in meeting this requirement. There have been weaknesses in the government's full, active and effective engagement in the EITI process. Some government representatives seem engaged with the process, but commitment is not consistent across government agencies. Some stakeholders consulted expressed concerns regarding the sustainability of the government's commitment in the long-term

<sup>22</sup> According to consultations, this decision was made through a Minister meeting, though there is no formal documentation of it.



related to its willingness to provide funding for the EITI implementation process. Despite these weaknesses, the government has an active participation in discussions and actively contributes to EITI reporting. The International Secretariat understands that there is a commitment to relocate the EITI-SR National Secretariat within the MONR to ensure adequate resources for implementation and government plans to enshrine transparency provisions in sector legislation, which could be signs of renewed government commitment to EITI.

In accordance with Requirement 1.1, the government must be fully, actively and effectively engaged in the EITI process. The government should guarantee the participation of senior government representatives in MSG meetings assuring the government engagement is consistent across all government departments. The government is required to mobilise resources for EITI implementation entrenching EITI funding in government budgeting to ensure the sustainability of EITI implementation over the long term, to address the staffing and capacities challenges faced so far, and to guarantee the autonomy of EITI-SR. To further strengthen implementation, the government is encouraged to embed the EITI in their policies and make use of the data disclosed through the process. The government is also encouraged to ensure that government representatives on the MSG attend meetings regularly.

## Industry engagement in the EITI process (#1.2)

### Documentation of progress

*Active engagement:* Oil and mining companies are represented on the MSG, and all material companies participate in EITI reporting (see Requirement 4.1). However, there is little evidence of an active engagement from industry in the EITI process apart from Staatsolie's public commitment to support the EITI process<sup>23</sup>. Despite having six seats on the MSG (three full members and three alternates), companies' participation appears to be solely focused on providing the relevant data to the EITI Reports. Industry seems not to make any use of this data, and is neither engaged in further dissemination efforts beyond those organized by the NS and the MSG. For example, they do not share the reports or other EITI related information on their own companies' websites, and do not play a relevant role in the discussions towards BO disclosures or contract transparency. When it comes to EITI core activities, such as approving the ToRs for the IA, preparing the work plans, and revising the reports there is indication of company engagement, though they have not appeared as the drivers of any of these tasks. Analysis of MSG minutes (see Annex B) shows that industry participation is not as consistent across the years. For example, during 2019, half of the companies representatives participated only in two out of twenty meetings held, while in 2018, there was only one representative assisting more than ten times (out of sixteen meetings), which meant that in six of meetings there was no company quorum according to the MSG ToRs. In a similar way, during 2017, half of the industry constituency attended to less than half of the thirty-one meetings held along the year. Companies did not fund any EITI-related activities, and there is no evidence of public statements regarding company's commitment to the EITI implementation in Suriname<sup>24</sup>. Companies have been aware of funding being a challenge for EITI continuity and together with the CSO constituency, have expressed their concerns to the government on this issue.

<sup>23</sup> EITI Support Statement. <https://www.staatsolie.com/en/about-us/>

<sup>24</sup> Companies have been aware of funding being a challenge for EITI continuity and together with the CSO constituency, have expressed their concerns to the government on this issue. See letter sent on September 2020 from CSOs and Companies representatives to the Minister of Natural Resources regarding the issue of funding.

Enabling environment: The Government of Suriname has ensured an enabling environment for company participation in the EITI implementation regarding laws, regulation and administrative rules. There is no evidence that fundamental rights of company representatives engaged in the EITI were not respected. Routine disclosure of data by company would require addressing confidentiality restrictions in the Tax Code. Participating in EITI reporting is not required by law and no sanctions exist for non-reporting companies.

## Stakeholder views

During consultations many highlighted that the companies do not make much use of EITI data, given that from a business perspective, there is not much utility in it - particularly for the offshore oil sector, where companies are only in the exploration phase so far. Other emphasized that the small mining association has been very active as well as the representation from Staatsolie, while the rest of the companies have not been as engaged. Some stakeholders mentioned that there is more work that could be done regarding companies' engagement, particularly with involving more mining companies which are currently not involved with the MSG such as the gold exporters. All companies confirmed that they have provided the data requested by the IA for preparing the EITI Report. Besides their engagement through the chore MSG activities such as work plan design, ToRs drafting, and Report's reviewing, some stakeholders noted that companies do not seem to be involved any further in dissemination or outreach efforts. They do not publish the reports on their websites, neither replicate any EITI data on their portals. Companies confirmed the lack of provision of funding for EITI in Suriname, except for very few exceptions related to small events (such as travel of MSG member to a relevant conference). Industry representatives at the MSG said that their communication is very fluent, and explained that, given that not always everyone is able to make it to the meetings, the relevant findings are usually communicated within fast channels in the constituency right after (either through WhatsApp chat or email), and later discussed when the minutes are approved in the next session.

## Initial assessment

The International Secretariat's initial assessment is that Suriname has made meaningful progress in meeting this requirement. There is an enabling environment for company participation, appropriate industry representation on the MSG, and the fundamental rights of company representatives engaged in the EITI appear to be respected. All material companies participated in EITI reporting. Even though there are no obstacles to company participation in the EITI process, the industry engagement appears to be limited to reporting data, and there is insufficient evidence to demonstrate that the constituency is fully engaged in all aspects of the EITI process, particularly with respect to the design of EITI reporting as well as dissemination and outreach related to the EITI.

In accordance with Requirement 1.2, industry should demonstrate that it is fully, actively and effectively engaged in the EITI process. Companies should review their engagement and work further in EITI implementation, ensuring that the objectives and activities of the process correspond to the priorities of wider industry constituency. Companies should also formalize and document their constituency coordination mechanisms and guarantee regular attendance at MSG meetings. To strengthen implementation, the industry constituency is encouraged to facilitate the publication of beneficial ownership information, as well as routine disclosures of data.



## Civil society engagement in the EITI process (#1.3)<sup>25</sup>

### Documentation of progress

Suriname ranks high in the Freedom in the World Index from Freedom House, with an overall score of 77/100, having a status of “free”<sup>26</sup>. The same index explains that the country is a constitutional democracy which generally holds free and fair elections. This was the case in May 2020 when the Surinamese elected their new government which came into office in July of the same year. Civicus Monitor follows the same lines and characterizes the country’s civic space as “open”.<sup>27</sup> Suriname has an active civil society, which includes human rights organisations, gender equality advocacy groups, community-based organisations, indigenous groups, faith-based organisations, and trade unions. Corruption appears to be a pervasive problem in Suriname, which Freedom House analysis notes undermines the rule of law; while another issue raised by Civicus also is the absence of key institutions and instruments to guarantee human rights, and a lack of independence in the judiciary.

**Expression:** Freedom of expression is guaranteed by Article 19 of the Constitution, and it seems to be respected in practice. The country has a wide diversity of media outlets, including privately-owned radio and TV channels, as well as independent newspapers, and there are no reports on internet restrictions.<sup>28</sup> There is thus an enabling environment for freedom of expression, allowing civil society to actively engage in expressing their views regarding the EITI process and more general regarding the government. There is no evidence that, in practice, the CSOs engaged in EITI implementation had been censored or restricted to participate in the process due to coercion or reprisal. For example, in July 2019 there was a minor protest regarding the Rosebel Goldmine, in which presumably illegal goldminers damaged property at the goldmine, as a response of the company’s security personnel fatally shooting an illegal goldminer. As a consequence, the mine was closed for one month and later reopened.<sup>29</sup> There is evidence of CSOs expressing critical views of the sector, whether in direct communications to the government, regarding their engagement and lack of proper funding for the EITI implementation in Suriname<sup>30</sup>, or in wider reports which focus more generally on the government’s accountability.<sup>31</sup>

**Operation:** Suriname does not have a specific law regarding the functioning of CSOs, but a wider applicable law on Foundations.<sup>32</sup> All of these, including CSOs, are overseen by the Ministry of Justice and Police, who requires their registration to be fully operable. Suriname has a very robust civil society with numerous domestic NGOs working on a number of issues as noted above, but not many focusing

<sup>25</sup> The first Validation under the EITI Standard (Azerbaijan 2016) established precedent for the Validation of requirement 1.3. The CSO protocol “operationalises” requirement 1.3. Each part of the CSO protocol speaks to specific parts of Requirement 1.3:

2.1 of the CSO protocol is intended to assess provisions 1.3(d), 1.3(e)(i), 1.3(e)(iv).

2.2 of the CSO protocol is intended to assess provisions 1.3.(b) and 1.3(c).

2.3 of the CSO protocol is intended to assess provision 1.3(e)(iii).

2.4 of the CSO protocol is intended to assess provisions 1.3.(a) and 1.3(e)(ii)

2.5 of the CSO protocol is intended to assess provision 1.3(d).

<sup>26</sup> See Freedom House: <https://freedomhouse.org/country/suriname/freedom-world/2020> (last consulted 5 December 2020)

<sup>27</sup> Civicus Monitor Tracking Civic Space <https://monitor.civicus.org/country/suriname/> (last consulted 5 December 2020)

<sup>28</sup> Civicus Monitor Tracking Civic Space, “Freedom of expression”: <https://monitor.civicus.org/country/suriname/> (last consulted 5 December 2020)

<sup>29</sup> See US State Department, 2020 Investment Climate Statements: Suriname: <https://www.state.gov/reports/2020-investment-climate-statements/suriname/> (last consulted 11 December 2020)

<sup>30</sup> See letter sent on September 2020 from CSOs and Companies representatives to the Minister of Natural Resources regarding the issue of funding.

<sup>31</sup> Policy monitoring reports from the Citizens Initiative for Participation and Good Governance (2017-2019):

<https://www.dbsuriname.com/wp-content/uploads/2020/05/Monitoringsrapport-Inleiding-Conclusies.pdf>; and report published by Projekta: <https://projekta-suriname.blogspot.com/2017/08/monitoring-voor-onze-toekomst-2015-2016.html>

<sup>32</sup> Law 19 of 1968 on the legal regulation of foundations - G.B. 1968 no. 74 (WET van 19 juli 1968, houdende wettelijke regeling van stichtingen): [https://eiti.org/files/documents/law\\_regulating\\_the\\_ngos\\_in\\_suriname\\_1.pdf](https://eiti.org/files/documents/law_regulating_the_ngos_in_suriname_1.pdf) (last consulted 7 December 2020)

on extractive related matters. The CSOs' funding seems to be provided mostly by foreign donors, either privately or through development agencies.<sup>33</sup> The legal framework is conducive to civil society's participation in EITI and Suriname's wider public debate on the extractive sector. No concerns have been raised regarding limitations on civil liberties. Overall, the civic space in the country is characterized by Civicus as a good place for open dialogue between organisations, and a place where CSOs can operate properly.<sup>34</sup>

**Association:** CSOs operate freely in the country<sup>35</sup>, as guaranteed by Article 20 of the Surinamese Constitution, which also guarantees the right to assembly. Many of them work in cooperation with other organisations in the Caribbean<sup>36</sup>, and coordinate their local activities through a wide civil society platform called the "Citizens' Initiative for Participation and Good Governance" (Citizen's Platform)<sup>37</sup>. This platform brings together several CSOs participating in the MSG, as well as others working more broadly on governance, rule of law and human rights issues – allowing the latter to collaborate on EITI matters when relevant. The US Department of State confirmed in 2019 that the law providing for the freedom of peaceful assembly and association are generally respected by the government.<sup>38</sup> Despite the freedom of association being largely respected in practice, it should be noted that the legislation allows for eight days of detention with no communication or legal representation when being investigated for serious crimes.<sup>39</sup> Nonetheless, there has been no indication of this type of reprimand being applied in connection with any EITI-related activities.

**Engagement:** Civil society representatives have participated very actively in MSG meetings, capacity building activities, and communications efforts related to EITI. They have ensured a wide representation within their constituency, not only by orchestrating their group through the Citizen's Platform mentioned above and a thorough nomination process, but also by ensuring a seat for an Indigenous and Tribal Peoples (ITPs) representative in the MSG, who has been actively engaged in implementation. The MSG CSOs have been involved in debating governance issues in a number of meetings with the wider civil society actors, as well as with some specific communities where mining takes place. Participation has been consistent across the constituency, and usually led by Projekta – one of the MSG CSO members who is usually seen as the driver of the process. It can be seen that some of the EITI data has been used by the CSO wider group as an input to the policy monitoring report prepared by the Citizen's Platform.<sup>40</sup>

**Access to public decision-making:** The Surinamese civic environment seems to provide sufficient access to these actors to the process of decision making. CSOs interact with government authorities through the MSG, and through direct communications.<sup>41</sup> Besides some public consultation

<sup>33</sup> See for example: Alcoa Foundation "Alcoa Foundation awards grant to Stichting Projekta in ...":

<https://www.alcoa.com/foundation/en/news/releases?id=2017/10/alcoa-foundation-awards-grant-to-stichting-projekta-in-suriname-to-improve-educational-and-environment&year=y2017>; and Terra Viva, "European Commission – Civil Society Development in Suriname" <https://terravivagrants.org/european-commission-civil-society-development-in-suriname/> (last consulted 14 December 2020)

<sup>34</sup> Civicus Monitor Tracking Civic Space: <https://monitor.civicus.org/country/suriname/> (last consulted 5 December 2020)

<sup>35</sup> Freedom House, "Associational and Organizational Rights": <https://freedomhouse.org/country/suriname/freedom-world/2020> (last consulted 5 December 2020)

<sup>36</sup> DCAF, Suriname Country Profile: <https://issat.dcaf.ch/Learn/Resource-Library2/Country-Profiles/Suriname-Country-Profile> (last consulted 5 December 2020)

<sup>37</sup> ParlAmericas, "Citizens' Initiative for Participation and Good Governance": [http://parlAmericas.org/uploads/documents/Projekta%20\(Surinam\).pdf](http://parlAmericas.org/uploads/documents/Projekta%20(Surinam).pdf) (last consulted 10 December 2020)

<sup>38</sup> US Department of State, 2019 Country Reports on Human Rights Practices: Suriname, <https://www.state.gov/reports/2019-country-reports-on-human-rights-practices/suriname/>

<sup>39</sup> Civicus Monitor Tracking Civic Space, "Freedom of association": <https://monitor.civicus.org/country/suriname/> (last consulted 5 December 2020)

<sup>40</sup> Policy monitoring reports from the Citizens Initiative for Participation and Good Governance (2017-2019): <https://www.dbsuriname.com/wp-content/uploads/2020/05/Monitoringsrapport-Inleiding-Conclusies.pdf>; and report published by Projekta: <https://projekta-suriname.blogspot.com/2017/08/monitoring-voor-onze-toekomst-2015-2016.html>

<sup>41</sup> See for example letter sent on September 2020 from CSOs and Companies representatives to the Minister of Natural Resources regarding funding, and statements from CSOs dated from July 2019 regarding the appointment of a new chair.

mechanisms,<sup>42</sup> there are also other channels that contribute to CSOs accessing to public decision making. For example, there is a parliamentary monitoring initiative through which CSOs track the progress on the implementation of government and parliament's commitments,<sup>43</sup> as well as a mobile app (*De Nationale Assemblée*) which facilitates access to parliamentary information and allows for providing feedback to parliamentarians.<sup>44</sup> Projekta, the leader organisation of the Citizen's Platform and MSG member, has also participated in various briefings with Members of the National Assembly regarding governance topics like corruption prevention, access to information legislation and gender equality.<sup>45</sup> The CSOs consulted have referred to the EITI process more broadly, not only as a useful channel for accessing public decision making, but also as a helpful platform for discussing more broadly the civil society concerns regarding governance of the sector. This can be seen in some of the CSOs publications aimed at influencing public decision making, while also keeping accountability of different transparency initiatives in the countries, including EITI amongst others.<sup>46</sup> The lack of legislation guaranteeing access to public information could potentially be a barrier for their engagement in public decision making,<sup>47</sup> but so far it has not been signalled by the constituency as a relevant problem.

## Stakeholder views

Stakeholders confirmed there are no constraints on freedom of expression in Suriname, nor on civil society's capacity to operate freely. Non-MSG CSOs added that they see the EITI as a good opportunity for the wider constituency to come together and work with each other. Stakeholders also said that CSOs are able to express critical views regarding the extractive sector in Suriname, and that there have been no incidents related to this, clarifying that there are no risks of personal threats for CSOs representatives, nor a feeling of unsafety.

All stakeholders confirmed freedom of associations for CSOs in Suriname. They mentioned that the constituency is very well organized, having several CSOs participating in the MSG, as well as a wider umbrella structure, Citizen's Platform, which facilitates the communication with other stakeholders. They also agreed on the freedom of engagement for CSOs in the country, and that even though the ITPs have not always been involved in extractives governance discussions, there are no formal barriers for their participation. They also clarified that currently the ITPs are represented at the MSG and have been participating in the meetings.

Many of the consulted stakeholders put emphasis on the role the CSOs have played regarding the implementation of the EITI. They said that the CSO constituency seems to have the most commitment within the MSG, and that they tend to be who regularly input the agenda of EITI Suriname. They added that CSOs can easily access to decision making process, and that when it comes to EITI process, they tend to lead discussions and be actively involved in setting the agenda. Given CSOs' proactive approach, they usually are the ones opening the dialogue and establishing new matters for discussion,

<sup>42</sup> For an overview on the processes for public consultations with stakeholders in Suriname, please see: IDB, "Public Consultations: Step By Step Regulatory and legal frameworks applicable in Suriname" (2020): <https://publications.iadb.org/publications/english/document/Public-Consultations-Step-by-Step-Regulatory-and-Legal-Frameworks-Applicable-in-Suriname.pdf> (last consulted 11 December 2020)

<sup>43</sup> Projekta, "Training Projectschrjven & Training Management Skills" (June 2017): <https://projekta-suriname.blogspot.com/2017/06/> (last consulted 11 December 2020)

<sup>44</sup> "De Nationale Assemblée" mobile app, available for download: <https://play.google.com/store/apps/details?id=adept.sr.dna&hl=en> (last consulted 11 December 2020)

<sup>45</sup> Parلامericas, "Citizen Participation in the Legislative Process": [https://parlamericas.org/uploads/documents/Toolkit\\_Citizen%20Participation%20in%20the%20Legislative%20Process.pdf](https://parlamericas.org/uploads/documents/Toolkit_Citizen%20Participation%20in%20the%20Legislative%20Process.pdf) (last consulted 11 December 2020)

<sup>46</sup> Policy monitoring reports from the Citizens Initiative for Participation and Good Governance (2017-2019): <https://www.dbsuriname.com/wp-content/uploads/2020/05/Monitoringsrapport-Inleiding-Conclusies.pdf>; and report published by Projekta: <https://projekta-suriname.blogspot.com/2017/08/monitoring-voor-onze-toekomst-2015-2016.html> (last consulted 5 December 2020)

<sup>47</sup> Global Right to Information Rating: <https://www.rti-rating.org/country-data/> (last consulted 5 December 2020)

having a very constructive participation in the process as a whole, as well as on specific points such as work plan drafting or reports' reviewing. Some stakeholders highlighted that in the beginning the CSOs were instrumental in getting EITI process settled in Suriname, and that ever since they have remained a fundamental element for implementation.

Consulted CSOs themselves also confirmed that they are free to proactively engage regarding the EITI process, clarifying that the only limitations they face in this regard are derived from: (i) their own capacities constraints: human resources, availability of time, and financial expertise for analysing EITI data, and from (ii) the fact that the lack of a fully operating NS, has meant that CSOs have had to dedicate considerable resources to fill the gaps of the local secretariat. For example, Projekta took over several managerial tasks for organizing events which has affected their capacity for engaging in more substantial issues.

Stakeholders added that most of the times all organisations have been present at the MSG meetings, though normally it would be the representatives from Projekta who would speak on behalf of the whole constituency. CSO members also mentioned that when salient points are up for discussion in the MSG, they tend to share this information in advance with the wider constituency through an extensive mailing list (created originally for the nomination process), and if necessary sometimes also organize civil society meetings for further debate on these issues.

## Initial assessment

The International Secretariat's initial assessment is that Suriname has made satisfactory progress in meeting the requirement on civil society engagement. Civil society is fully, actively and effectively engaged in all aspects of the EITI implementation process in Suriname. There are no indications of government actions that result in narrowing or restricting public debate in relation to EITI implementation. There are examples of stakeholders' ability to freely express their opinions on transparency and natural resource governance issues without restraint, coercion or reprisal. Stakeholders are substantially engaged in the implementation of the EITI process and have the right to communicate and cooperate with each other. Stakeholders are able to engage actively in the design, implementation, monitoring and evaluation of the EITI process, and there are examples of how CSOs contributes to public debate.

To strengthen implementation of Requirement 1.3, Suriname is encouraged to further strengthen the engagement between those CSOs MSG members and other CSOs working on related matters. Suriname should also ensure that CSOs have adequate technical and financial capacity to participate in the EITI providing access to capacity building and resources for analysing and using EITI data, particularly in the communities where mining activities are conducted.

## MSG governance and functioning (#1.4)

### Documentation of progress

MSG composition and membership: The MSG is composed by nine seating members, and nine corresponding alternates (three of them for each constituency), providing for an adequate representation of the different stakeholders involved in Suriname's extractive sector.<sup>48</sup> The government constituency has two members from MONR (one seat and one alternate), two from the MOF (one seat and one alternate), and one from the MORD (one seat) and one from the MOTI (one

<sup>48</sup> For further references see list of MSG members in Annex A.

alternate). The company constituency is organized in three sub-groups, having each of them one seating member and one alternate. These are: small and medium size mining companies (represented by Small and Medium Size Companies - Canasur and Nana Resources), large scale mining companies (represented by Iam Gold and Newmont) and gas and oil companies (represented by Staatsolie and Tullow Oil). The CSO constituency is also organized in a similar structure, wider civil society (Projekta and VIDS, VSG & 12 Lo's der Aukaner), labor unions (Staatsolie Employee Organisation Suriname and the Rosebel Gold Mines Employee Organisation) and indigenous people (Canvas).

While the candidature application explained how the process was conducted by each constituency group to nominate their own representatives including outreach activities, there is no formal systematization regarding the nomination and representation procedures<sup>49</sup>. In practice, the nomination of each of the representative was coordinated following the general guidelines set forth in the ToRs of the MSG, and then specifically according to each constituency's decision. Within the CSO group there is some evidence related to outreach activities to the broader constituency, but this is not the case for the companies and government. The government and industry constituencies do not have a codified procedure for the selection of members,<sup>50</sup> but have coordinated internally amongst them. CSOs have a good documentation of their selection procedure. From 2017 to 2019 there were a few changes in MSG representatives, mainly regarding alternates, and there is no evidence of tensions in those processes. More generally, their ad-hoc procedures seem to work, since there have been no complains about lack of representation in any of the constituencies. It appears that the stakeholders proceed to the selection of their EITI representatives from within their respective executive bureau/council, and it seems that these are considered as the correct stakeholders to represent the interests of each constituency before the MSG.

ToRs and MSG governance: The MSG's norms were set out in October 2016.<sup>51</sup> They are quite comprehensive, and they provide specific rules defining the role, responsibilities and rights of the MSG, their internal governance mechanisms, and their capacities for approving work plans and overseeing implementation. In this sense, the ToRs establish the general framework for nomination of members (the specificities of each constituency procedures are to be determined independently by each of them) as well as the duration of their terms (three years) and the termination causes. They also determine the qualifications needed to become an MSG member, and outline their roles and responsibilities (art. 3). These requirements seem to fit the MSG work and capacity needs, considering that during both tenures of the MSG (2016-2019; 2019-present) the members have been able to carry out their duties, and engage in the relevant exercises of EITI implementation. There have been few cases of inactivity from certain members, who were not engaged, but their lack of participation has never reached the point of being the grounds for removal (as established in the ToRs).

The ToRs also set forth the rules for decision-making within the MSG and provide the members with a mandate to approve work plans, decide on the appointment of the IA, review and approve EITI Reports, amongst others. Given the information reflected in the meeting minutes, there is no evidence to conclude that decision-making has not been conducted in an inclusive way. As an exception, it should be noted that there was one incident in 2018 regarding the appointment of the chair. On this point, during 2017 the MSG had discussed a proposal to rotate the position of MSG Chair amongst

<sup>49</sup> Suriname's Candidature Application file: <https://bit.ly/2TfrrRe> (last accessed on 04 December 2020)

<sup>50</sup> CSOs have shared with the International Secretariat, via email, some documents which provide useful references to how they have conducted their selection procedure. These files include (i) the outlining of the criteria for (potential) nominees, and a consent/commitment form for taking the membership, and (ii) two reports, one of the initial selection of the civil society representatives in 2016, and another for a new member in 2017. They have also shared with the IS the documentation of MSG members' liaison with other CSOs, including the list of the larger civil society group which receive the e-mail updates and calls for nominations, and a presentation & short report of a wider CSO meeting held in January 2019 for discussing the renewal of the CSOs' membership in the MSG.

<sup>51</sup> Terms and terminations' of the MSG ToR: [https://eitipuriname.org/wp-content/uploads/2019/04/official\\_SEITI\\_ToR\\_2016.pdf](https://eitipuriname.org/wp-content/uploads/2019/04/official_SEITI_ToR_2016.pdf) (last accessed on 04 December 2020)



the three constituencies, under the condition of also strengthening the NS so that it could provide the necessary support the chairing tasks. Given that at the time, the NS was not staffed as expected, the proposal for rotating the chair appointment was not implemented, and this caused certain friction between CSOs and government representatives. The internal governance rules seem to be followed in practice, and there is no evidence pointing to issues or breaches of these norms.

Besides the rules set forth in the ToRs, the MSG has liaised with the broader constituencies, making sure they are up to date on the EITI process. The liaison of the government and industry constituencies seems to be more informal and more on an ad-hoc basis. CSOs have organized themselves through a rigorous and wide nomination process, enabled by the Citizen's Platform. This has enabled them to involve the larger group of CSOs in the debates regarding governance issues in a number of meetings with the wider civil society actors, as well as with some specific communities where mining takes place. Participation has been consistent across the constituency, and usually led by Projekta – one of the MSG CSO members who is usually seen as the driver of the process.

*Per diems:* The ToRs do not include a per diem policy, and there is no evidence to believe per diems have ever been allocated in relation to the functioning of the Surinamese MSG. Although not explicitly stated in the MSG's ToRs or on EITI-SR's website, there are no provisions for per diems to be paid or evidence that any such payments are made in practice.

*National secretariat:* Section 6 of the ToRs defines the structure and functions of the NS including supporting the MSG by convening the meetings and their follow-ups, coordinating communication and public relation activities to promote the work of the MSG, keeping a central record on events and publicity on EITI in Suriname, and managing and reporting on the EITI-SR budget and procurement activities. Section 6 determines that the NS will be hosted by the Bauxite Institute Suriname (BIS) or any other institute established by the MONR. Since the Bauxite Institute which first hosted the NS closed down, the NS has been hosted by the MONR. The ToRs also establish that the NS will consist of a manager (equivalent of a National Coordinator) as well as supporting staff as required. In practice so far, the NS has not had a full-time coordinator, nor full time support staff, but has had human resources allocated through the MONR staff, which has served in a part-time capacity. The lack of full-time staff has seriously impacted the NS capacity to provide the support needed for the MSG and delivering activities related to EITI implementation. Currently the NS is being re-staffed as a consequence of the change in administration, and it is expected a change regarding its rank within the MONR which could allow enhanced staffing resources. This change of rank would entail a higher institutional position within the MONR, granting more autonomy to the NS and better access to resources.

## Stakeholder views

Members of the MSG confirmed that the establishment of the group was first led by the CSOs (through Projekta) in 2015, engaging first with the government on this matter, and later with industry. After the commitment to implement EITI and with the help of Projekta, the MONR sent invitations to different kick-off events on EITI, and finally, in April 2016 they hosted the first workshop on EITI. This was a large event including several CSOs and companies, which gave way to regular meetings and seminars conducted from August 2016 onwards. Many explained that for forming the MSG, each constituency has selected their own representative, and no stakeholders consulted expressed any concerns on this point. They did clarify that the process was not established or coded anywhere and was simply led individually by each constituency on ad-hoc basis.

CSOs and companies consulted have confirmed appointing their own representatives without interference of the other constituencies and they considered being adequately represented. CSOs had a lengthy and detailed process, in which they held elections to pick their members for the MSG. They selected three representatives (with corresponding alternates): one from the tribal communities, one from the labour unions, and one from NGO working on democracy, transparency and governance. Within the CSOs wider group and in terms of the tribal communities' representation, they noted a non-codified agreement on accepting the member nominated by the ITPs organisations. This followed ITPs own internal procedures. Regarding the industry constituency, stakeholders confirmed the lack of documentation or codification regarding its representatives' selection process and their role's expectations. In the beginning of the EITI process in Suriname, a steering committee set up by the government invited all extractives companies operating in the country to join, they noted. Then, as companies have explained, they decided to divide the constituency in a similar way to CSOs, having a representative from large mining companies, one from small mining and one from the oil & gas sector (each of them with an alternate member as well).

Stakeholders consulted said procedures from each constituency were followed for changing representatives. They added that the few times members were changed, outside the alternation established for the three years period, it was related to a professional or personal decision of the member leaving their position at work or moving abroad. There were no members who had been revoked, neither any others who resigned for reasons beyond personal ones. Along the first three years (2016-2019) there was a change of the representative from the MOF, and from CSOs and companies there were also some people who dropped out due to lack of time available for fulfilling their roles. Regarding the ITPs representatives within the CSO group, there was a member who resigned given that he was also sitting at the Supervisory Board of Staatsolie, which conflicted with the agreed criteria for his appointment. Stakeholders confirmed that a resignation was presented, and the current ITP representative was appointed for the alternate position.

The changes in CSOs representation were mostly on the level of alternates, which allowed for the seating members to remain the same since 2016. This was based on a decision taken within the larger CSOs group, in which they agreed to change their constituency representation only in thirds through each MSG renewal, considering the level of technical work the EITI process requires. Hence, since two people (alternates) had already left by the time of the MSG membership renewal in 2019, CSOs representatives confirmed that it was agreed that the remaining four CSO representatives would stay for the new period. and government representatives were directly renewed according to stakeholders. There were no concerns raised by stakeholders regarding reasons to renew or reconsider MSG members.

Several stakeholders have indicated that the lack of a proper functioning NS has translated into the MSG being burdened with administrative chores, which has seriously impacted their ability to actively engage on more substantive issues. Dave Abeleven has been in charge of chairing the MSG meetings, and the stakeholders have agreed he has done a good job during his period. Stakeholders have also explained that the communication within the MSG is very fluent but faces some difficulties regarding the meeting minutes, in terms of their timeliness as well as their quality. Some of them explained that minutes are usually produced with some lack of clarity and quite a significant delay, being only ready for approval by the following meeting - which in certain cases has made it harder for members to properly follow-up on the discussions. They explained that the delays in the minutes is related to the NS having limited staff capacity, and hence not being able to prepare the relevant documentation ahead of subsequent meetings.

Consulted stakeholders confirmed that the decision-making process outlined in the MSG ToRs has been followed in practice. For example, they explained that the work plans and ToRs for the IA had



been approved during MSG meetings, following thorough discussions. They also explained that until the outbreak of the COVID-19 pandemic they met regularly, usually twice a month, and sometimes more if there were urgent matters. Nonetheless they noted that, due to the meetings being hosted on Friday afternoons, this made participation of all MSG members more difficult. However, they clarified that quorum has not been a problem given that alternates tend to be in the meetings as well. In terms of the COVID-19 outbreak, stakeholders agreed that this represented a big challenge for the MSG work. They had to move to virtual meetings and given issues of internet access, combined with the transition in government, this meant they were not able to meet as frequently.

Some MSG members referred to a minor issue in the MSG decision-making, dating back in 2017, when there was a discussion about having a 10<sup>th</sup> independent member chairing the MSG meetings with no vote. The tensions were derived because government had their candidate, and industries and CSOs had theirs – without reaching an agreement. The proposal was in the end dismissed and the MSG continue functioning with nine members.

Stakeholders confirmed that the MSG did not have a per-diem policy or practice.

## Initial assessment

The International Secretariat's initial assessment is that Suriname has made meaningful progress towards meeting this requirement. The MSG includes appropriate representation of each constituency and there is agreement on the internal processes by which each stakeholder group nominated their representatives, even though CSOs are the only ones with a clearly documented selection process. All civil society representatives on the MSG appear to be independent, operationally and in policy terms, from government. The MSG's ToRs outlines the roles and responsibilities of MSG members in line with Requirement 1.4.b.iv-v and meeting records show that MSG members who attend meetings carry out their duties and responsibilities. However, there have been some deviations from the MSG's ToRs in practice. These include a lack of proper staffing for the NS as well as clarity on its institutional hosting, inconsistent MSG attendance and frequently delayed MSG meetings minutes which have affected the MSG discussions and follow-ups. While the MSG has respected its clear statutory decision-making rules in practice, the lack of attendance of some MSG members at certain meetings has weakened the MSG buy-in to implementation and monitoring of the EITI process in Suriname, particularly in relation to issues beyond disclosure requirements. Even though MSG members generally have the capacity to carry out their duties, funding constraints have had a strong impact on the MSG's capacity, especially considering the constrained NS support. However, the renewal of MSG members in 2019, and the prospect of the institutional relocation of the NS in higher ranks within the MONR are encouraging trends.

In accordance with Requirement 1.4, the MSG should ensure that the procedures for nominating its representatives are adequately codified and documented, and that there are established mechanisms for liaising with their broader constituencies, which are followed in practice. The MSG should ensure that deviations from their ToRs are recorded and transparent, and adequately and publicly codified. The MSG should ensure that its lack of per diem practice is publicly clarified. The MSG should guarantee there is sufficient advance notice of meetings and timely circulation of documents prior to their debate and proposed adoption, and that written records of its discussions and decisions are adequately kept through Minutes. Government and company constituencies are should to ensure that their representatives' attendance at MSG meetings is consistent and of sufficiently high level to allow the MSG to take decisions and follow up on them. To strengthen implementation of Requirement 1.4, the MSG is encouraged to re-orient its focus from the EITI reporting process to reforms in extractive sector governance. The MSG is encouraged to make use of the subcommittees (Article 3.2 of the

MSG's ToRs) and invite key government institutions that regulate the extractive sector such as the Central Bank to participate closely in EITI debate.

## Work plan (#1.5)

### Documentation of progress

*Publicly accessible workplan:* The MSG has so far prepared two work plans covering the periods of 2016-2018<sup>52</sup> and 2019-2020<sup>53</sup>. The latter work plan was approved at the MSG meeting held on 28 June 2019. After approval the document shared via email with the IS for its publication on its website, and was shared also on the EITI-SR website.<sup>54</sup> The previous work plan (2016-2018) does not appear to be published on EITI-SR website, and there are no public documents related to the updates and reviews on neither of the work plans, or brief revision providing tracked progress on implementation.

*Objectives and activities for EITI implementation:* The current work plan offers an overview of government policies and priorities, highlighting that one of the main challenges in the contextualization of the EITI process in Suriname is the lack of formal, comprehensive and clearly defined national priorities. This is a consequence of the fact that the government is still developing a national policy for the mining sector. The work plan also emphasizes that, as part of the governments' commitment to joining EITI and embedding the process in the country's legal framework, they intend to establish a new Minerals Institute, which will be responsible for implementing the mining policy. The 'Goals and Objectives' section in the work plan refers to extending the scope of EITI reporting to match the 2019 EITI Standard, by including gender, labour, and environmental data.

The 2019-2020 work plan's main take-away from two years of EITI implementation, focuses on the challenges of producing the EITI reports in circumstances of marked capacity constraints. In this sense, the MSG reflections in the work plan explained that, despite having the intention of developing broader subjects related to EITI implementation, most of the NS and MSG work for 2019-2020 will have to focus on disseminating the 2016 EITI Report and producing the reports corresponding to 2017 and 2018. The 2019-2020 work plan does not include specific objectives for EITI, but simply refers to broader activities grouped under the name of "objectives". These are: (i) Prepare and execute a communication plan to ensure EITI-SR reports are available to the public; (ii) Implement of the BO roadmap; and (iii) Prepare, complete and submit the 2nd and 3rd EITI Reports covering 2017 and 2018.

*Activities related to the scope of EITI reporting:* The work plan does not include activities aimed at extending the scope of EITI reporting enhancing technical aspects of the EITI Standard apart from efforts towards BO disclosures. Both work plans have been focused on core EITI implementation, emphasizing on the publication of the corresponding reports and the dissemination and awareness raising efforts, as well as preparation for the first validation, as a key activity for the whole MSG.

*Activities aimed at addressing any capacity constraints:* The 2019-2020 work plan includes activities aimed at capacity building of the MSG members such as activity 2.4.3 which established as an activity to "assess capacity of government and companies to use templates and mechanisms". These activities however are limited to constraints in the MSG related to reporting process. While there is a

<sup>52</sup> 2016-2018 work plan: [https://eiti.org/files/documents/suriname\\_work\\_plan\\_30\\_april\\_2017.pdf](https://eiti.org/files/documents/suriname_work_plan_30_april_2017.pdf) (last accessed on 04 December 2020)

<sup>53</sup> 2019-2020 Work plan: [https://eitipuriname.org/wp-content/uploads/2020/01/MSG\\_Workplan\\_2019\\_2020.pdf](https://eitipuriname.org/wp-content/uploads/2020/01/MSG_Workplan_2019_2020.pdf) (last accessed on 04 December 2020)

<sup>54</sup> The 2019-2020 S-EITI work plan can be consulted in the S-EITI web portal available at: [https://eitipuriname.org/wp-content/uploads/2020/01/MSG\\_Workplan\\_2019\\_2020.pdf](https://eitipuriname.org/wp-content/uploads/2020/01/MSG_Workplan_2019_2020.pdf)

budget allocated for capacity building for the NS in the work plan, it does not clarify in detail which constraints in the NS should be addressed.

Legal or regulatory obstacles: The 2019-2020 work plan does not clarify if legal or regulatory obstacles were identified when implementing the EITI in the country apart from BO disclosures legal challenges. The current work plan establishes actions for the implementation of the BO roadmap and partially addressing the legal and regulatory obstacles for the public disclosure of BO data. Besides this point, the work plan does not provide any details for implementation of other requirements from the Standard such project-level reporting, contract transparency, comprehensiveness and data reliability, or routine disclosure of data towards systematic disclosures more broadly.

Measurable and time-bound activities: The activities listed along objectives three to five of the work plan, are time-bound and measurable, but do not have specific cost allocations – given that the work plan provides a gross overview of costs listed in the EITI-SR Budget 2019 -2020. The budget presents aggregated costs regarding different components, such as “communication”, “reconciliation report”, and “EITI-SR coordinator”, without indicating the specific budgets for the activities listed along each of the objectives. While the 2019-2020 work plan does not provide examples of specific consultations or input from key stakeholders, the objectives for implementation listed in the document seem to have the endorsement of the whole MSG, as well as other relevant actors from the wider CSO constituency.

Plans for implementing the recommendations from EITI reporting: The 2019-2020 work plan, under activity 2.1.1 outlines follow ups on recommendations from the 2016 EITI Report and, if possible, from the 2017 EITI Report, as well as from IS's. There is a budget allocated for following-up recommendations from the IA.

Costings and funding sources: For some of the activities, the 2019-2020 work plan includes general costings and funding sources referring to the World Bank grant (which ended on 30 September 2020), and a future World Bank policy loan. The total costs for 2019-2020 as presented in the EITI-SR Budget amount to USD 234,500. The work plan shows the dependency of EITI-SR on World Bank financial assistance for EITI implementation in Suriname.

## Stakeholder views

A few stakeholders said the work plan is a reflection of the MSG priorities, as well as those from wider stakeholders. With regards to the oil sector, some highlighted that for the time being, given that offshore oil production in Suriname is at an early development stage, there are no specific priorities to reflect on work plan. Some stakeholders mentioned that even though the work plan has been a good foundation for EITI work in Suriname, sometimes it has turned into a very static document, with very few updates and progress tracking, and mostly focus on publishing the EITI Reports. This, some explained, has been (even if partly) a consequence of the limited resources available for EITI implementation in Suriname, which has forced the MSG and the NS concentrate their efforts on the basic requirements for meeting the Standard. Some MSG members mentioned that there was a proposal for having a technical committee in charge of monitoring the implementation of the work plan, but this was not agreed upon, and hence it was not implemented.

In terms of the wider objectives and national priorities, some emphasized that the work plan could be more detailed, characterizing the preparation of the current and past work plan as ticking boxes exercises. They mentioned that there are important issues on the extractive agenda in Suriname, which are not reflected on the work plan. This is the case for example of getting a better overview of

the small-scale mining activities in the country or implementing “free prior informed consent” as a way for better engaging with the communities. They also emphasized that there are some new elements of the EITI Standard, such as mandatory disclosure of extractive contracts granted or amended from 01 January 2021, which have not been addressed yet, given that the MSG focus has been to produce the reports as required within the corresponding timeline.

During consultations some stakeholders emphasized that the plans for systematic disclosure are quite vague, not addressed in the work plan and that in reality, there is still a long way to go, mostly due to technological barriers and data collection with a few exceptions such as systematic disclosure of extractive revenues in the MOF’s website. They also mentioned that for now there has not been a concrete discussion on the next work plan, which represents a challenge given that the current one covers only until the end of 2020.

Regarding feedback from other stakeholders and broader input to the work plan, CSOs have explained that, through their periodic network meetings they usually share information on the work plan with other CSOs and get their input on the different issues. It was also highlighted that in each work plan the World Bank had a relevance influence, by providing significant input, given that they are the main sources of funding. In some occasions, this influence generated some underlying friction in the discussion of the work plan according to stakeholders consulted.

The financial structure for supporting the EITI process in Suriname has been highlighted several times as one of the biggest challenges for implementation. Until now, funding has been instrumentalized through a World Bank grant and going forward it will be covered by a World Bank policy loan (expected to last for five years). A representative from the donor community noted that this new funding allocated for the process will cover subsequent reports and, most important, community outreach which, according to the stakeholder, is lacking in Suriname. The dependency on external funding is seen by some stakeholders as a weakness of the process, and it would be good to get additional funding for other aspects of EITI implementation. A stakeholder from a donor partner noted that funding from the government would be key in the coming years, and the donor community such as the European Union should also be engaged in promoting the EITI implementation in Suriname.

## Initial assessment

The International Secretariat’s initial assessment is that Suriname has made inadequate progress towards meeting this requirement. The work plan includes vague objectives for the EITI in Suriname, without reference to specific government policies for the extractive sector and does not appear to reflect fully national priorities for the extractive industries and EITI principles. The work plan does include very limited activities related to the scope of EITI reporting. While the work plan is publicly available, was endorsed by the MSG, and all constituencies had the opportunity to influence on it, it lacks a clear account of costs as well as an updated progress of implementation. Implementation of the work plan’s activities is lagging, particularly with regards to dissemination efforts and communication objectives. The work plan does not identify or outline plans to address any potential legal or regulatory obstacles to EITI implementation apart from beneficial ownership disclosures legal challenges. The latest version of the work plan, covering beyond 2020, is yet to be made publicly available.

In accordance with Requirement 1.5, the MSG is required to agree on an updated, revised and fully costed work plan which reflects wide stakeholders’ priorities for the extractive sector, and is organized through specific and measurable activities. The work plan should address the scope of EITI disclosures and follow-up of recommendations, as well as focus on issues like contract transparency

and implementation of project level reporting. The MSG should ensure consultation on the work plan beyond MSG members. The MSG is encouraged to consider whether the EITI process could contribute in addressing broader issues related to the extractive activities in Suriname, such as free and informed prior consent for the mining projects.

**TABLE 1 – SUMMARY INITIAL ASSESSMENT TABLE: MSG OVERSIGHT**

EITI provisions	Summary of main findings	International Secretariat's initial assessment of progress with the EITI provisions
Government oversight of the EITI process (#1.1)	While some government representatives seem fully, actively and effectively engaged in the EITI process, commitment is not consistent across government agencies. There is government participation in MSG meetings and EITI reporting. The strong initial commitment of the government to EITI has weakened throughout implementation, however there are signs pointing to a renewed government's commitment.	Meaningful progress
Company engagement (#1.2)	Industry engagement with the EITI process appears to be limited to reporting data, and there is insufficient evidence to demonstrate that the constituency is fully engaged in the EITI process. There is an enabling environment for company participation, an appropriate representation in the MSG, and the fundamental rights of company representatives engaged in the EITI are respected.	Meaningful progress
Civil society engagement (#1.3)	Civil society is actively effectively engaged in the EITI process and there is no indication of restrictions to expression, association or operation. Stakeholders are able to engage actively in the design, implementation, monitoring and evaluation of the EITI process. Stakeholders are able to communicate and cooperate with each other and are able to operate freely and express opinions about the EITI without restraint, coercion or reprisal.	Satisfactory progress
MSG governance and functioning (#1.4)	<p>The MSG has representatives from each stakeholder group with no suggestion of interference or coercion in the nomination processes. There seems to be an agreement on the internal processes by which each stakeholder group nominated their representatives, even though CSOs are the only ones with a clearly documented selection process. All civil society representatives on the MSG are independent, operationally and in policy terms, from government.</p> <p>There have been some deviations from the MSG's ToRs in practice. These include a lack of proper staffing for the NS as well as clarity on its institutional hosting, inconsistent MSG attendance and frequently delayed MSG meetings minutes which have affected the MSG discussions and follow-ups.</p>	Meaningful progress
Work plan (#1.5)	The work plan includes vague objectives for the EITI in Suriname and does not appear to reflect fully national or constituency's priorities for the extractive industries and EITI	Inadequate progress



<p>principles. The work plan includes very limited activities related to the scope of EITI reporting. While the work plan is publicly available, was endorsed by the MSG, and all constituencies had the opportunity to influence on it, it lacks a clear account of costs as well as an updated progress of implementation. The work plan does not identify or outline plans to address any potential legal or regulatory obstacles to EITI implementation apart from BO disclosures legal challenges.</p>	
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**Secretariat's recommendations:**

20. In accordance with Requirement 1.1, the government must be fully, actively and effectively engaged in the EITI process. The government should guarantee the participation of senior government representatives in MSG meetings assuring the government engagement is consistent across all government departments. The government is required to mobilise resources for EITI implementation entrenching EITI funding in government budgeting to ensure the sustainability of EITI implementation over the long term, to address the staffing and capacities challenges faced so far, and to guarantee the autonomy of EITI-SR. To further strengthen implementation of Requirement 1.1, the government is encouraged to embed the EITI in their national policies and make use of the data disclosed through the process. The government is also encouraged to ensure that government representatives on the MSG attend meetings regularly.
21. In accordance with Requirement 1.2, the industry should demonstrate that it is fully, actively and effectively engaged in the EITI process. Companies should review their engagement and work further in EITI implementation, ensuring that the objectives and activities of the process correspond to the priorities of wider industry constituency. Companies should also formalize and document their constituency coordination mechanisms and guarantee regular attendance at MSG meetings. To strengthen implementation of Requirement 1.2, the industry constituency of the MSG in Suriname is encouraged facilitate the publication of Beneficial Ownership information, as well as routine disclosures of data.
22. To strengthen implementation of Requirement 1.3, Suriname is encouraged to further strengthen the engagement between those CSOs MSG members and other CSOs working on related matters. Suriname should also ensure that CSOs have adequate technical and financial capacity to participate in the EITI providing access to capacity building and resources for analysing and using EITI data, particularly in the communities where mining activities are conducted.
23. In accordance with Requirement 1.4, the MSG should ensure that the procedures for nominating its representatives are adequately codified and documented, and that there are established mechanisms for liaising with their broader constituencies, which are followed in practice. The MSG should ensure that deviations from their ToRs are recorded and transparent, and adequately and publicly codified. The MSG should ensure that its lack of per diem practice is publicly clarified. The MSG should guarantee there is sufficient advance notice of meetings and timely circulation of documents prior to their debate and proposed adoption, and that written records of its discussions and decisions are adequately kept through Minutes. Government and company constituencies are should to ensure that their representatives' attendance at MSG meetings is consistent and of sufficiently high level to allow the MSG to take decisions and follow up on them. To strengthen implementation of Requirement 1.4, the MSG is encouraged to re-orient its focus from the EITI reporting process to reforms in extractive sector governance. The MSG is encouraged to make use of the subcommittees (Article 3.2 of the MSG's ToRs) and invite key government institutions that regulate the extractive sector such as the Central Bank to participate closely in EITI debate.
24. In accordance with Requirement 1.5, the MSG is required to agree on an updated, revised and fully costed work plan which reflects wide stakeholders' priorities for the extractive sector, and is organized through specific and measurable activities. The work plan should address the scope of EITI disclosures and follows-up of recommendations, as well as focus on issues like contract transparency and implementation of project level reporting. The MSG should ensure consultation on the work plan beyond MSG members. The MSG is encouraged to consider whether the EITI process could contribute in addressing broader issues related to the extractive activities in Suriname, such as free and informed prior consent for the mining projects.



## Part II – EITI Disclosures

### 2. Award of contracts and licenses: Requirement 2

#### 2.1 Overview

This section provides details on the implementation of the EITI requirements related to the legal framework for the extractive sector, licensing activities, contracts, beneficial ownership and state participation.

#### 2.2 Assessment

##### Legal framework (#2.1)

##### Documentation of progress

The 2017 EITI Report includes an overview of relevant laws, government entities, fiscal terms in the mining, oil, and gas sector at the level of legislation, the degree of fiscal devolution and brief commentary on current reforms.

##### Stakeholder views

No stakeholders consulted expressed concerns of legal framework disclosures. However, a government representative considered the draft mining law a significant reform and wished it can be discussed within the MSG. No stakeholders consulted expressed concerns regarding roles and responsibilities of relevant government agencies disclosures in the EITI Report. The IA and a senior government representative confirmed that the role of the Central Bank has increased in recent years. A number of stakeholders consulted expressed concerns regarding fiscal regime disclosures in PSCs as the latter are not publicly available. While a PSC model is publicly available, some stakeholders expressed their concerns regarding a lack of awareness of tax incentives provided in PSCs. The IA and different stakeholders clarified that no direct subnational payments specific to the extractives sector exists in Suriname. A few stakeholders confirmed that the Government of Suriname is currently undertaking a revision of its 1986 Mining Code, as mining legislation is out of date, and does not reflect current best practice.

##### Initial assessment

The International Secretariat's initial assessment is that Suriname has made satisfactory progress in meeting this requirement. The 2017 EITI Report includes an overview of relevant laws, government entities, fiscal terms in the mining, oil, and gas sector at the level of legislation, the degree of fiscal devolution and brief commentary on current reforms.

To strengthen implementation, Suriname may wish to use EITI reporting as an annual diagnostic of the implementation of legal reforms in the extractive industries, as a basis for further reforms. Suriname may wish to consider using EITI reporting as a diagnostic of deviations in practice in PSCs and mining agreements from the fiscal frameworks reflected in laws, raising awareness of these issues among community and industry stakeholders. In addition, to strength the implementation of Requirement 2.1,

Suriname might consider to strength disclosures on the role of the Central Bank given their increasing importance in the data management from the extractive sector.

## License allocations (#2.2)

### Documentation of progress

**Awards-transfers:** In mining, the 2017 EITI Report confirms that 19 mining licenses were awarded in 2017, including 15 exploration licenses, three exploitation licenses and one small-scale license, albeit without any additional information such as the list of specific licenses awarded, license names, location, license-holder names. The report also confirms that two mining licenses were transferred in 2017 including one exploration license and one exploitation license, however information such as the transferee and transferor names or the license names were not identified. The report also provides an aggregated overview of the number of licenses granted to RGM, Newmont and Grassalco as of 31 December 2017, and highlights gaps in license information extracted from the license database managed by the Geologisch Mijnbouwkundige Dienst (GMD). The information required by Requirement 2.2 cannot be accessed through the GMD database. It is unclear from the EITI Report and from other publicly-accessible sources whether any small-scale mining licenses were awarded or transferred in 2017. For oil and gas, the 2017 EITI Report lists two oil license allocations during 2017, identifying recipients. It however does not confirm whether there were transfers of any oil and gas licenses. Moreover, the report highlights that there is no information available regarding oil concessions granted to Staatsolie.

**Awards-transfers process:** The process for awarding and transferring mining and oil licenses has not been comprehensively disclosed in the 2017 EITI Report. This information is not disclosed on neither the MONR, GMD nor Staatsolie's respective websites.

**Technical and financial criteria:** The report does not describe technical and financial criteria assessed in the process for awarding and transferring mining, oil and gas licenses and it is not disclosed on neither the MONR, GMD nor Staatsolie's publicly available websites.

**Non-trivial deviations:** The report does not refer to any non-trivial deviations from statutory procedures in the allocation of the 19 and two licenses in the mining and oil sectors respectively, nor in the transfer of two mining licenses in 2017.

**Comprehensiveness:** While the report provides an aggregated overview of the number of licenses granted to large-scale mining companies RGM, Newmont and Grassalco prior to 2017, there is no additional information such as the list of specific licenses awarded, license names, or location. Small-scale mining license awards and transfers prior to 2017 are not available in the 2017 EITI Report or on any publicly-available source.

**Bidding:** The Report confirms that after two bidding rounds for blocks 59 and 60 that took place from September 2015 to September 2016, licenses were awarded in 2017. While the report confirms the existence of a bidding round in 2017 for blocks 61 and 62, it also explains that the bidding round was only concluded, and licenses awarded in 2018. The lists of applicants and the bid criteria applicable for blocks 59 and 60 have been not comprehensively disclosed.

**Commentary on efficiency:** For mining, the report highlights significant inefficiencies in the license management system, noting a lack of robust systems in the MONR and GMD websites and the lack of cadastral information on licenses. While an overview of the number of licenses was derived from the license database, the IA noted their inability to express any opinion about the completeness and accuracy of the database, and the information derived from it. The 2017 EITI Report does not express any view regarding the efficiency related to license allocations for oil.

## Stakeholder views

**Awards-transfers:** There was considerable uncertainty between different stakeholders, including within the MONR, over the specific number of mining license awards and transfers in 2017. Government representatives highlighted the lack of a publicly available source where a complete list of the specific license awards and transfers could be found for either 2017 or previous years. Stakeholders suggested that more information about mining licenses might be publicly available in the SMB timber industry website. There was consensus among all stakeholders consulted that oil concession rights for oil activities are granted exclusively to Staatsolie. Government representatives confirmed that there were two oil license awards and that there were no oil and gas transfers in 2017.

**Awards-transfers process:** Government representatives noted that there is transparency on the GMD website regarding the procedure for awarding and transferring mining licenses, but they did not provide any specific source. Government representatives confirmed that transfers of mining licenses were allowed upon written approval from the MONR and provided that the transferee company has similar capacities as the transferor company. For oil, a government representative from Staatsolie confirmed that oil licenses are awarded through competitive tender and considered that the bidding process was transparent, but without providing any specific reference or link.

**Technical and financial criteria:** For mining, the IA confirmed that there were no specific technical or financial criteria for awards or transfers in 2016 and 2017. While a senior government representative confirmed that there are general guidelines for the authority to assess technical and financial criteria, no source documentation was provided. For oil, the IA relayed Staatsolie's views that specific technical and financial criteria for oil license awards should remain confidential. A senior representative from Staatsolie confirmed that specific technical and financial criteria for license tenders were included in the bid documents as list of pertinent documentation required to document technical and financial capabilities. While the specific criteria might differ according to the licenses tendered, a government official confirmed that the broad criteria were consistent across all licenses and that the publication of all bid criteria would not pose a problem.

**Non-trivial deviations:** Government representatives confirmed there were no non-trivial deviations from the applicable legal and regulatory framework governing mining and oil license awards and transfers, even if the statutory procedures are unclear, including technical and financial criteria.

**Bidding:** A government representative confirmed that bidding rounds for blocks 59 and 60 were completed in 2017 but a bidding criterion or a list of bidders was not disclosed publicly, reported only to the Staatsolie Board of Directors and relevant Ministers. Offers for blocks 61 and 62 were made in 2017 but these offers were completed in 2018. In general, the information publicly available per bid is the announcement of the offer, the number of blocks and the location of the block in a document issued "solely for the assistance and guidance of potential bidders"<sup>55</sup>, as explained by a government representative. It was noted that the publication of unsuccessful bidders might pose some challenges.

## Initial assessment

The International Secretariat's initial assessment is that Suriname has made inadequate progress towards meeting this requirement. The 2017 EITI Report includes the number of mining licenses awarded and transferred in 2017 but does not include further required information about these licenses. The report does not provide either a general description of the process for awarding mining licenses and oil contracts through competitive bidding, nor the process for transferring licenses. The EITI Report does not clarify the procedures followed for their award and transfer in practice. The

<sup>55</sup> An example of bid document can be found here: <https://www.staatsolie.com/media/1m5dpwi/instruction-to-bidders-16-11-20.pdf>

existence of bid criteria for oil license awards, and a list of bidders for the two oil contracts awarded in 2017 is unclear, as is the types of technical and financial criteria assessed in the award of two mining licenses in 2017.

In accordance with Requirement 2.2, Suriname should ensure that comprehensive information about the recipients of mining, oil and gas licenses awarded and transferred in the year(s) under review are publicly accessible, alongside a description of the actual allocation and transfer process including the roles of relevant government entities and technical and financial criteria assessed (and weightings if applicable), and any non-trivial deviations from statutory procedures in practice. Where licenses are awarded through a bidding process, the government is required to disclose the list of applicants and the bid criteria. Suriname may also wish to comment on the efficiency of the current license allocation and transfer system as a means of clarifying procedures and curbing non-trivial deviations.

## License registers (#2.3)

### Documentation of progress

*Licenses held by material companies:* The 2017 EITI Report explains that the IA collected information on mining licenses held by three large scale mining companies (RGM, Newmont, and Grassalco) as of December 2017 from the mining companies themselves. While 15 small-scale mining companies associated with Small and Medium Size Companies (SHMR) are considered material and within the scope of EITI reporting, no list of licenses held by these material companies appears to be publicly available, either from EITI reporting or other public sources. For oil, while the report confirms there were no oil concessions granted to Staatsolie in 2017, it lists the government Resolutions that approved the award of oil concessions to Staatsolie prior to 2017. While the report does not provide links to the full text of the PSC contracts, the International Secretariat confirms that there are two publicly available PSCs agreed with Kosmos<sup>56</sup>. In sum, there are no publicly accessible registers of licenses for mining or oil.

*License coordinates:* The report does not provide guidance on accessing coordinates of any of the mining licenses. Moreover, the full text of oil and gas PSCs is not publicly accessible on the Staatsolie website (with only two PSCs published on a different website<sup>57</sup>), which means that coordinates of oil blocks are not publicly available.

*Dates:* Suriname does not maintain a publicly-accessible mining cadastre or oil concessions database that provides dates of application, award and expiry (or duration) for all licenses held by material companies. The EITI Report does not disclose this information. For mining, while the report discloses the date of award and the duration of each license held by three large material mining companies (RGM, Newmont and Grassalco) as of end-2017, dates of application are not available. In oil, the two PSCs available in the Resource Contracts portal include the dates of award and duration, but do not provide the dates of application for the two oil and gas licenses. Staatsolie's website provides information on dates of award, but not on dates of application or duration of licenses.

*Commodity:* The report does not provide the commodity(ies) covered by each mining license. In oil, the two PSCs available in Resource Contracts portal confirm that the licenses cover both oil and natural gas.

*Licenses held by non-material companies:* The report does not provide information on licenses held by non-material companies and individuals.

<sup>56</sup> Accessed on <https://resourcecontracts.org/search/group?q=&country%5B%5D=SR>

<sup>57</sup> See Kosmos PSC available in [resourcecontracts.org](https://resourcecontracts.org).

Public cadastre/register: For mining, the report confirms that data on mining licenses was sourced from a “licenses database”. In relation to the data found in this database, the IA raised concerns over the data quality and poor government record-keeping. However, the report highlights efforts on improving the cadastre management system, including the launch of an online application system for mining licenses. For oil and gas, the report explains that Staatsolie has a register of licenses but does not confirm whether it is publicly accessible free of charge, upon request. The International Secretariat did not identify a publicly available website in neither any of the government website or Staatsolie’s.

## Stakeholder views

Oil and gas licenses: A government representative consulted confirmed that there have been fourteen oil and gas license awards in total as of October 2019. Stakeholders explained that Staatsolie does maintain a database for its oil and gas licenses but the database nor the full-text of PSCs are publicly accessible. A few stakeholders confirmed that while PSCs provide dates of award and expiry, commodity(ies) covered and name of license-holder, these PSCs are not publicly available. In any case, the dates of application are not publicly accessible for all PSCs signed to date.

Mining licenses: There was consensus amongst stakeholders consulted that Suriname does not yet have a fully functioning mining cadastre or electronic register updated with mining licenses granted to date. Several stakeholders highlighted efforts by the MONR to digitize and automate the process of citizen’s requests for mining licenses, which has been paper-based and kept manually by the mining agency in the past.

The IA confirmed that the number of mining licenses included in the 2017 EITI Report were drawn from the GMD database, but that the accuracy of this list was not assessed. The IA also highlighted some discrepancies between different lists from the GMD and the MONR of companies holding mining licenses for which it recommended for both agencies to compare their registers frequently.

The IA also mentioned that licenses held by material companies were reported by the companies themselves. No stakeholder could confirm whether the GMD database was comprehensive of all active licenses at that time. A government official confirmed that there are no mechanisms in place to maintain the GMD database and ensure it is updated.

A government official confirmed that several small-scale contracts are not publicly available. Small-scale mining representatives consulted explained that it might be possible to publish small-scale mining contracts in the future, but there were no concrete plans to do so at present.

The IA recommended that the MONR establish and manage a publicly-accessible centralised database covering all mining and oil licenses in future.

## Initial assessment

The International Secretariat’s initial assessment is that Suriname has made inadequate progress towards meeting this requirement. The 2017 EITI Report provides only a fraction of the information listed under Requirement 2.3.b, related only to some large-scale mining licenses. There is significant uncertainty over the comprehensiveness of license information collected by the regulator (GMD) to date. While there are plans to digitize license information on the GMD website, the cadastre system is not yet operational. Staatsolie does not publish oil contracts on its website which might include most information listed under Requirement 2.3.b aside from dates of application.

In accordance with Requirement 2.3, Suriname should maintain a publicly available register or cadastre system with timely and comprehensive information on all mining, oil and gas licenses including license-holder name, dates of application, award and expiry, commodity(ies) covered and



coordinates. The MSG should work with the MONR, GMD and Staatsolie to ensure all license information listed in Requirement 2.3.b is available for all extractives licenses active in the period under review.

## Contract disclosures (#2.4)

### Documentation of progress

#### Government policy:

For contracts: For mining, the 2017 EITI Report does not document the government’s policy for disclosing mining contracts. The 1986 Mining Decree and regulations however provides the basis for mining contracts, according to which the mining contracts are approved by the parliament and published in the official gazette. The 1986 Mining Decree does not make any reference to the existence of small-scale mining agreements<sup>58</sup>. For oil and gas, the 2017 EITI Report clarifies the government’s policy for contract disclosure in the oil sector highlighting the lack of legal provisions that require transparency of PSCs. However, it also documents Staatsolie’s commitment to make PSCs publicly available, confirming that Staatsolie “*will work towards disclosure of the signed PSCs going forward*”.

For Licenses: For mining, the 2017 EITI Report confirms that mining licenses have a similar content<sup>59</sup>. The report also confirms that while mining licenses are not publicly disclosed, most issued mining licenses “*are generally edited in a standard format and are made specific were necessary, for among others, the type of mining right, the location, the coordinates and the commissioner of the district where the mining right will be executed*”<sup>60</sup>. Article 38 of the 1986 Mining Decree however authorizes the Minister of Natural Resources to set special conditions related to the manner of exploitation. There seems to be a contradiction related to the license basis system for ASM in both reports published by Suriname. While the 2017 EITI Report seems to confirm that small-scale mining contracts exist in Suriname, the 2016 EITI Report however confirms that small-scale mining is purely based on licenses assigned by the MONR rather than mineral agreements. For oil, the report does not mention what the policy of public disclosure of licenses is.

Practice and accessibility: For mining, contracts are easily accessible on the Parliament Website. There are no small-scale mining contracts publicly available. For oil and gas, while the PSC model is publicly available, the report confirms that PSCs are not publicly disclosed. The Resource Contracts portal lists two oil and gas PSCs that have been disclosed, involving Kosmos Energy. The report confirms that there is no public accessibility of the full text of mining licenses by the MONR. On the other hand, the 1986 Mining Decree confirms that oil concession rights for petroleum activities are granted exclusively to Staatsolie. According to the Petroleum Law, state enterprises with petroleum concession rights, are authorized to enter into PSCs with other petroleum companies. The report confirms that Staatsolie maintains an oil license register for oil concessions awarded to Staatsolie which is not publicly available.

<sup>58</sup> 1986 Mining Decree. <https://www.staatsolie.com/media/0wvhuuv3/mining-decree-1986.pdf>

<sup>59</sup> 2017 EITI Report. p.32

<sup>60</sup> 2017 EITI Report. p.62



## Stakeholder views

For mining, industry and government representatives consulted confirmed that mining agreements between the Government of Suriname and large-scale mining companies are publicly available on the National Assembly's website. A small-scale mining company representative confirmed the possibility to publish their contracts in the medium to long term, but it was not clear whether they were referring to mining licenses. For oil and gas, An State-Owned Enterprise (SOE) representative confirmed Staatsolie's commitment to make PSCs publicly available and that there have been steps taken towards this goal, although no concrete actions were shared. An industry representative highlighted that it was up to Staatsolie to decide whether to publish active PSCs.

## Initial assessment

The International Secretariat's initial assessment is that Suriname has made meaningful progress towards meeting this requirement. The 2017 EITI Report clarifies the government's policy for contract disclosure in the oil sector and documents Staatsolie's commitment to make PSCs publicly available. While the report does not document the government's policy for disclosing mining contracts, the 1986 Mining Decree requires the full text of all mining contracts to be published in the official gazette. Mining contracts are easily accessible in the Parliament's website. It is not clear however whether mining contracts exist for ASM. The government's policy on the public disclosure of the full text of mining and oil and gas licenses is not sufficiently clarified. There is no public accessibility of the full text of mining licenses by the MONR. Oil and gas licenses are awarded to Staatsolie who then enter into PSCs with private oil companies. The oil license register maintained by Staatsolie is not publicly available.

To meet the Requirement 2.4, Suriname must document the government's policy on disclosure of contracts and licenses that govern the exploration and exploitation of oil, gas and minerals. This should include relevant legal provisions, actual disclosure practices and any reforms that are planned or underway. An overview of the contracts and licenses that are publicly available should be disclosed in the public domain and include a reference or link to the location where these are published. Suriname is encouraged to publish PSCs currently in force with relevant annexes, and to undertake a review of published mining and oil contracts ensuring that the published contracts are available in a centralized website which should be regularly updated. In accordance with Requirement 2.4.a, Suriname is required to disclose any contracts and licenses that are granted, entered into or amended from 1 January 2021.

## Beneficial ownership disclosure (#2.5)

### Documentation of progress

Adherence to Requirement 2.5 on beneficial ownership is assessed in Validation as of 1 January 2020 as per the framework agreed by the Board in June 2019<sup>61</sup>. The assessment consists of a technical assessment focusing on initial criteria and an assessment of effectiveness. The assessment considers the BO Roadmap, and the legal assessment of the institutional framework for BO in Suriname and advice on the first steps of BO implementation commissioned by the MONR (BO Assessment Document)<sup>62</sup>.

<sup>61</sup> Board decision 2019-48/BM-43: <https://eiti.org/board-decision/2019-48>.

<sup>62</sup> The document was prepared by P.P.G. Bissessur LL.M. and dates 30 September 2020, hence after the data collection deadline for validation purposes. The document is not publicly available at the date of the elaboration of this assessment.

## Technical Assessment

The technical assessment is included in Annex F. It demonstrates that Suriname has introduced definition of “beneficial owner” in the Disclosures of Unusual Transactions Act (Wet Melding Ongebruikelijke Transacties), and the Service Providers Identification Act (Wet Identificatieplicht Dienstverleners) which provide a limited legal basis for BO disclosures as these legal instruments only required to share BO data with relevant authorities. There are no provisions for public BO disclosures. There is no definition of “politically exposed person” in the Surinamese legislation. There are no obligations for extractive companies to maintain BO information. There is no definition of “politically exposed person” or “beneficial owner” approved by the EITI-SR.

BO information was requested from companies that made material payments through EITI reporting. As with other required data, senior management signature was requested as data quality assurance. The data provided by companies was published through the 2017 EITI Report however, this data only covers legal owners. No company provided BO data as part of EITI reporting. For the two large scale mining companies reporting, Newmont and RGM, there is up-to date publicly-available information on the stock exchange filings of publicly listed companies as their headquarters are public listed companies: IAMGOLD is listed on the Toronto Stock Exchange, and the New York Stock Exchange (NYSE), and Newmont is listed in the NYSE. It appears that extractive companies outside the EITI reporting process have not been requested to disclose BO information. EITI-SR has also requested BO data from the MOF. It does not seem that the MOF maintains the requested data in its records.

The latest Suriname’s FATF mutual evaluation (2009)<sup>63</sup> suggest that the authorities do not have access to companies’ beneficial ownership information. There is not an updated Suriname’s FATF mutual evaluation.

## Assessment of effectiveness

EITI-SR requested a legal assessment of the institutional framework for BO in Suriname (BO Assessment Document) in 2020. The study includes an overview of international good practice on BO disclosures, review of relevant legislation and regulations to identify definitions and BO public disclosure requirements, and review of the relevant institutions involved in the extractives sector. The BO Assessment Document recommended a definition of beneficial owner and “political exposed person”, the level of details of BO disclosures that should be required, and the institution or agency that could best be suited to collate and maintain BO data. It recommended setting up a public BO register for the extractive sector, ideally managed by the Suriname Chamber of Commerce and Industry (SCCI) who which collect and maintain BO information as part of its statutory task to maintain the Trade Register. Considering that the study is very recent (November 2020) there has not been follow-up on these recommendations.

As mentioned, for the 2017 EITI Report, EITI-SR requested BO data to reporting companies through reporting templates and requested assurances (management sign-off). This resulted in very limited data of legal owners rather than beneficial owners, and there is no indication of outreach to companies to explain why disclosing BO is important or to provide advice on filling the template. There is no government’s committed to setting up a BO register in line with the provided recommendations above mentioned.

There is no indication of the MSG considering which extractive companies should be prioritised for BO disclosures based on, for example, the commodity they produce or their legal ownership. The most

<sup>63</sup> Mutual Evaluation Report. Anti-Money Laundering and Combating the Financing of Terrorism. Suriname (2009). Paragraph 607. See: <https://www.fatf-gafi.org/countries/s-t/suriname/documents/mutualevaluationofsuriname.html>

significant barriers to effective BO disclosures in Suriname appear to be lack of legislative and practical progress in establishing a public register and lack of outreach to extractive companies. Current procedures for oil, gas or mining license awards and transfers do not require the applicant to provide the names of beneficial owners.

## Stakeholder views

Stakeholder consultations suggested that there is no government agency that holds BO information from extractive companies holding extractive licenses in Suriname. National secretariat's representatives confirmed that the MSG did not agree an appropriate definition of the term "beneficial owner". Different stakeholders confirmed the lack of public register of beneficial owners. Stakeholders from all constituencies confirmed the government's commitment to BO disclosure for all companies in Suriname, although concrete steps in doing so were not shared. Members of the MSG confirmed that EITI-SR had yet to begin collecting data on extractives companies' BO, as only legal owners were reported during the last reporting cycle. The IA confirmed that BO information was requested in the last reporting cycle. Small-scale miners confirmed that the disclosure of beneficial owners is not requested by laws and regulations in Suriname, however this information might be publicly available by these companies in the medium or long term. Representatives from RGM and Newmont confirmed that their headquarters are public listed companies.

## Initial assessment

The International Secretariat's initial assessment is that Suriname has made inadequate progress towards meeting this requirement. EITI-SR has not agreed appropriate definitions for the terms "beneficial owner" and "politically exposed person". EITI-SR requested BO data from reporting companies and agreed assurances that reporting companies were requested to provide although not applicable exclusively to BO data. The Disclosures of Unusual Transactions Act, and the Service Providers Identification Act provide a limited legal basis for BO disclosures as the information is only shared with relevant authorities. There is no government committed to establishing a public register of beneficial owners, and progress has been limited to date. Information disclosed through the 2017 EITI Report is limited to legal owners of reporting companies.

A study was commissioned by EITI-SR in 2020 to provide recommendations towards systematic disclosures of BO information. The final study was shared with EITI-SR and the International Secretariat but is not publicly available.

In accordance with Requirement 2.5 and the Board-agreed framework for assessing progress, Suriname is required to disclose the beneficial owners of all companies holding or applying for extractive licenses by 31 December 2021. To achieve this target, the following measures are recommended:

- vii. Suriname is requested to agree an appropriate definition for the terms "beneficial owner" and "politically exposed person".
- viii. Suriname is expected to request all companies holding oil, gas and mining licenses to disclose BO information and provide adequate assurances for data reliability. The government is encouraged to establish a public register of beneficial owners which could be integrated into the Trade Register managed by the SCCI.
- ix. Suriname is encouraged to require all applicants of oil, gas and mining licenses to disclose their beneficial owners at the application stage. An assessment of the comprehensiveness

and reliability of this information should be integrated into the licensing procedures followed by the MONR and Staatsolie.

- x. Suriname is encouraged to agree priorities for BO disclosures and, based on these priorities, plan efforts to obtain this data. For example, Suriname may prioritise disclosures by certain types of companies holding a certain type of license or producing a certain commodity due to risks related to corruption or tax evasion. These priorities should guide outreach efforts to companies and provide them guidance.
- xi. It is recommended that Suriname considers using the EITI's model BO declaration form to ensure that disclosures are published in open data format, comparable and easy to analyse.
- xii. Suriname may also wish to expand BO disclosures to other segments of the upstream extractive value chain, for instance through collection and disclosure of BO information from extractive-sector service providers to improve the public debate.

## State participation (#2.6)

### Documentation of progress

The 1986 Mining Decree confirms that concession rights for petroleum activities are granted exclusively to state enterprises<sup>64</sup>. The Petroleum Law states that state enterprises with petroleum concession rights are authorized to enter into petroleum agreements with other (private) petroleum companies<sup>65</sup>. Staatsolie is a state enterprise which has been granted rights for petroleum activities in Suriname<sup>66</sup>, established in 1982. Staatsolie may enter into PSCs and joint-ventures with International Oil Companies (IOCs)<sup>67</sup> and is signatory of all PSCs<sup>68</sup>. As IOCs did not start production yet, Staatsolie does not collect revenues from these companies. Revenues reported by Staatsolie are related to its own onshore oil production. Staatsolie also runs downstream operations (refining, marketing and distribution of petroleum and retail products). Staatsolie holds a 25% interest in a joint venture (JV) Suriname Gold Project C.V. (Surgold) with Newmont operating the “Merian Gold Mine” thus Staatsolie also generates revenues from the mining sector. The payments to governments reported by Staatsolie are Corporate Income Tax (CIT), Wage Tax and Dividends. Meanwhile, the detailed reconciliation table by company shows no payments made to Staatsolie by IOCs<sup>69</sup>.

Grassalco is a wholly owned government state mining company established in 1971<sup>70</sup>. Grassalco is not identified in the EITI Report as recipient of other company payments. Grassalco's activities were focused on the production of crushed stone. According to 2016 Grassalco's Annual Report<sup>71</sup>, the main revenues of Grassalco are obtained from royalties resulting from the minerals agreement with lamGold (Rosebel Gold Mines N.V). While the report confirmed that royalty -in kind (gold) paid by RGM is received by Grassalco on behalf of the MOF<sup>72</sup>, it is unclear whether Grassalco received effectively

<sup>64</sup> Decree of 8 May 1986 containing general rules concerning the exploration and exploitation of minerals, accessed on <https://www.staatsolie.com/media/Ovwhuuv3/mining-decree-1986.pdf> (last accessed on 21 November 2020).

<sup>65</sup> Law of 6 March 1991 containing further regulations for the exploration and exploitation of hydrocarbons, accessed on <https://www.staatsolie.com/media/htzpfxt/petroleum-law.pdf> (last accessed on 21 November 2020).

<sup>66</sup> Concession Agreement of Staatsolie 1981. Decree E8-B, SB 1981/59.

<sup>67</sup> State Decree of 4 May 2005, accessed on <https://www.staatsolie.com/media/mxankyo1/state-decree.pdf> (last accessed on 21 November 2020).

<sup>68</sup> See: <https://www.staatsolie.com/en/petroleum-regulator/active-production-sharing-contracts/> (last accessed on 21 November 2020).

<sup>69</sup> Table 5.2 Overview reported payment by companies and by MOF 2017. 2017 EITI Report. p.56.

<sup>70</sup> National Prosecution Service of 1971/authorization act 1971 to establish NV Grassalco SB/Mining Decree 1986. Accessed on <https://eitipuriname.org/wp-content/uploads/2019/04/seiti-factsheet-eng.pdf>

<sup>71</sup> 2016 Grassalco Annual Report p.6 accessed on [https://grassalco.com/data/files/GAC\\_JV-2016-FINAL.pdf](https://grassalco.com/data/files/GAC_JV-2016-FINAL.pdf) (last accessed on 21 November 2020).

<sup>72</sup> Table 3.4. Revenue streams and beneficiaries

the in-kind payment from RGM as later it received proceeds from the sale of the gold<sup>73</sup>. The revenue streams reported by Grassalco are Custom Duties, Surface rights, and “Proceeds from sale of gold received in-kind”.

**Materiality:** Payments to government by Staatsolie and Grassalco are included in the reconciliation.

**Financial relationship with the government:** The financial relationship between Staatsolie and the government is explained in broad terms in the 2017 EITI Report<sup>74</sup>. While no prevailing rules regarding the financial relationship between the government and Staatsolie have been disclosed, practices governing this relationship are disclosed in the report. In addition, the 2017 Staatsolie Annual Report (Staatsolie’s Annual Report) confirmed this financial relationship including a loan received from the Government of Suriname including the terms, interest payable, and repayment conditions<sup>75</sup>, monthly cash calls regarding the contribution on the Suriname Gold Project CV<sup>76</sup>, distribution of dividends, and retained earnings<sup>77</sup>. There is no statement confirming the existence of reinvestments. Information on related party relationships of Staatsolie and its subsidiaries is publicly available<sup>78</sup>. The financial relationship between Grassalco and the government is not explained in the 2017 EITI Report. There is also no statement explaining or confirming the absence of such transfers.

**Government ownership:** The 2017 EITI Report describes the government’s ownership of 100% of Staatsolie and Grassalco, however it does not describe the terms associated with state equity in the two SOEs<sup>79</sup>. The report confirms that Grassalco has three subsidiaries not active in the year under review<sup>80</sup>. It also confirms that Staatsolie has four subsidiaries – three of them in the downstream oil and gas sector, one in the upstream sector but not active<sup>81</sup>, and a JV with Newmont with an interest of 25%. The terms associated with the JV with Newmont is briefly explained in both the report and the Staatsolie’s Annual Report. The terms associated with other ownership interests is not disclosed in the EITI Report or other public documents. The report confirms that the Government of Suriname has a 5% ownership interest in RGM together with IAMGOLD who owns 95%. The report also confirms that the Government of Suriname held a 30% interest in the Saramacca Project through its wholly-owned subsidiary, NV1, together with RGM with a 70% interest. In 2016, RGM acquired the rights to the Saramacca gold property from NV1 and made payments to the government in 2017. NV1 however was not a reporting entity in 2017. The report confirms the lack of changes in the level of state ownership in Staatsolie during 2017, but it does not confirm the same for Grassalco.

**Loans and guarantees:** Details of a loan from the government to Staatsolie are described in the report including repayment schedule and interest rate. The 2017 Staatsolie’s Annual Report describes an additional loan from Staatsolie to the state-owned power utility Energie Bedrijven Suriname (EBS), including the interest rate, loan amount, and payments in 2017<sup>82</sup>. Neither the report nor other public source reference any loans or guarantees extended by the government to Grassalco. There is no public evidence of loans or guarantees from Staatsolie and Grassalco to companies operating in the mining, oil and gas sectors.

<sup>73</sup> See p.46 in the 2017 EITI Report. «In Suriname, RGM pays royalty in-kind to the SOE Grassalco».

<sup>74</sup> See p.71-72 in the 2017 EITI Report.

<sup>75</sup> 2017 Staatsolie Annual Report, p. 135 accessed on: <https://www.staatsolie.com/media/gccj3bx5/staatsolie-annual-report-2017-online-final.pdf>

<sup>76</sup> 2017 Staatsolie Annual Report, p.106.

<sup>77</sup> 2017 Staatsolie Annual Report, p.38-39.

<sup>78</sup> 2017 Staatsolie Annual Report, Section 7.

<sup>79</sup> 2017 EITI Report. p.20

<sup>80</sup> 2017 EITI Report. p.26

<sup>81</sup> Table 3.2. Overview subsidiaries Staatsolie. 2017 EITI Report. p.27

<sup>82</sup> 2017 Staatsolie Annual Report, p.146



## Stakeholder views

**Materiality:** There was consensus amongst stakeholders consulted that only two SOEs were material in line with the definition of SOEs in Requirement 2.6.b. The IA and some MSG members noted that there were occasional discussions of SOEs by the MSG meetings, mainly in relation to the scope of activities (whether upstream or downstream) to be covered in the report. Donors and several representatives from the government and industry constituencies explained that the public typically trusted the SOEs. While NV1 has been recognized as a SOE in the EITI Report, the IA and a few government representatives confirmed that this was not the case. The IA and a government representative confirmed that NV1 was not considered a SOE for reporting purposes in 2017 as it was not considered material. A government representative explained that NV1 had been dismantled in early 2020 and that all assets had been transferred to Staatsolie.

**Financial relationship with the government:** While stakeholders confirmed that the financial relationships between Staatsolie and the government are governed by the Petroleum Law (Articles 5 to 10). As Staatsolie is a limited company incorporated and domiciled in Suriname, it follows the rules for retained earnings, reinvestments and debt financing applicable to any company in accordance with the 1936 Suriname Commercial Code<sup>83</sup>. It was noted that the financial relationship between the government and Grassalco was explained in the company's annual reports, these documents were not yet published. Stakeholders from Grassalco confirmed that there were no loan or guarantees granted by the government to Grassalco, or granted by Grassalco to mining, oil and gas companies in 2017. Civil society representatives and the IA highlighted their concern regarding the lack of disclosures by Grassalco, such as their annual reports.

**Loans and guarantees:** There was consensus amongst stakeholders consulted that the government provided a loan to Staatsolie in 2017. The IA noted that it had included all of the data on loans or guarantees it had received in the EITI Report.

## Initial assessment

The International Secretariat's initial assessment is that Suriname has made meaningful progress in meeting this requirement. The practice of Staatsolie's financial relations with government is clear from the EITI Report combined with Staatsolie's annual report and financial statements. While the rules governing Staatsolie's financial relations with government are not described in the EITI Report, Staatsolie appears to be regulated under the 1936 Suriname Commercial Code, which applies to all companies. There is very little publicly accessible information on Grassalco, with none of the information listed in Requirement 2.6.a available. However, these gaps should be balanced against the low materiality of Grassalco, which is primarily focused on crushed stone. There is little information on a state-owned company called NV1, although the Secretariat understands that the entity was absorbed by Staatsolie in early 2020.

In accordance with requirement 2.6.a, Suriname should ensure that a comprehensive overview of Grassalco is publicly disclosed, including an explanation of the prevailing rules and practices related to Grassalco's retained earnings, reinvestment and third-party funding. The government should also ensure annual disclosure of a comprehensive account of any loans or loan guarantees extended by the state or Grassalco to mining, oil, and gas companies in line with Requirement 2.6.b. The terms of Staatsolie's participation in the Merian Gold Mine should be comprehensively disclosed. Suriname is required to clarify whether NV1 is a government-owned corporation, and whether it is a material state-owned enterprise.

<sup>83</sup> See: [http://www.dna.sr/media/20530/wetboek\\_van\\_koophandel.pdf](http://www.dna.sr/media/20530/wetboek_van_koophandel.pdf)



TABLE 2- SUMMARY INITIAL ASSESSMENT TABLE: AWARD OF CONTRACTS AND LICENSES

EITI provisions	Summary of main findings	International Secretariat's initial assessment of progress with the EITI provisions
Legal framework (#2.1)	The 2017 EITI Report includes an overview of relevant laws, government entities, fiscal terms in the mining, oil, and gas sector at the level of legislation, the degree of fiscal devolution and brief commentary on current reforms.	Satisfactory progress
License allocations (#2.2)	The 2017 EITI Report includes the number of mining licenses awarded and transferred in 2017 but does not include further required information about these licenses. It does not clarify the procedures followed for their award and transfer in practice and does not provide either a general description of the process for awarding mining licenses and oil contracts through competitive bidding, nor the process for transferring licenses. The existence of bid criteria for oil license awards, and a list of bidders for the two oil contracts awarded in 2017 is unclear, as is the types of technical and financial criteria assessed in the award of two mining licenses in 2017.	Inadequate progress
License registers (#2.3)	The 2017 EITI Report provides only a fraction of the information listed under Requirement 2.3.b and related only to some large-scale mining licenses. There is significant uncertainty over the comprehensiveness of license information collected by GMD to date. While there are plans to digitize license information, the cadastre system is not yet operational. Staatsolie does not publish oil contracts, aside from dates of application, on its website which might include most information listed under Requirement 2.3.b.	Inadequate progress
Contract disclosures (#2.4)	The 2017 EITI Report clarifies the government's policy for contract disclosure in the oil sector and documents Staatsolie's commitment to make PSCs publicly available. While the Report does not document the government's policy for disclosing mining contracts, mining contracts are approved by the parliament, and are easily accessible in the Parliament's website. It is not clear however whether mining contracts exist for ASM. There is no public accessibility of the full text of mining licenses by the MONR, and the government policy on the public disclosure of the full text of mining and oil and gas license is not sufficiently clarified. Oil and gas licenses are awarded to Staatsolie who then enter into PSCs with private oil companies. The oil license register maintained by Staatsolie is not publicly available.	Meaningful progress
Beneficial ownership disclosure (#2.5)	EITI-SR has not agreed appropriate definitions for the terms "beneficial owner" and "politically exposed person". EITI-SR requested BO data from extractive companies making material payments, and also agreed assurances that reporting companies were requested to provide although not applicable exclusively to BO data. Legal instruments provide a limited legal basis for disclosures as the Acts required for this information to be shared only with relevant authorities. There is no government committed to	Inadequate progress

	establishing a public register of beneficial owners. Information on legal owners of reporting extractive companies has been published in the 2017 EITI Report. There is limited progress on the BO Roadmap.	
State-participation (#2.6)	The practice of Staatsolie's financial relations with government is clear from the EITI Report combined with Staatsolie's Annual Report and financial statements. While the rules governing Staatsolie's financial relations with government are not described in the EITI Report, Staatsolie appears to be regulated under the 1936 Suriname Commercial Code, which applies to all companies. There is very little publicly accessible information on Grassalco, with none of the information listed in Requirement 2.6.a available. There is little information on a state-owned company called NV1, although it seems the entity was absorbed by Staatsolie in early 2020.	Meaningful progress
<p><b>Secretariat's recommendations:</b></p> <ol style="list-style-type: none"> <li>To strengthen implementation of Requirement 2.1, Suriname may wish to use EITI reporting as an annual diagnostic of the implementation of legal reforms in the extractive industries, as a basis for further reforms. Suriname may wish to consider using EITI reporting as a diagnostic of deviations in practice in PSCs and mining agreements from the fiscal frameworks reflected in laws, raising awareness of these issues among community and industry stakeholders. Suriname might consider to strength disclosures on the role of the Central Bank given their increasing importance in the data management from the extractive sector.</li> <li>In accordance with Requirement 2.2, Suriname should ensure that comprehensive information about the recipients of mining, oil and gas licenses awarded and transferred in the year(s) under review are publicly accessible, alongside a description of the actual allocation and transfer process including the roles of relevant government entities and technical and financial criteria assessed (and weightings if applicable), and any non-trivial deviations from statutory procedures in practice. Where licenses are awarded through a bidding process, the government is required to disclose the list of applicants and the bid criteria. Suriname may also wish to comment on the efficiency of the current license allocation and transfer system as a means of clarifying procedures and curbing non-trivial deviations.</li> <li>In accordance with Requirement 2.3, Suriname should maintain a publicly available register or cadastre system with timely and comprehensive information on all mining, oil and gas licenses including license-holder name, dates of application, award and expiry, commodity(ies) covered and coordinates. The MSG should work with the MONR, GMD and Staatsolie to ensure all license information listed in Requirement 2.3.b is available for all extractives licenses active in the period under review.</li> <li>To meet the Requirement 2.4, Suriname must document the government's policy on disclosure of contracts and licenses that govern the exploration and exploitation of oil, gas and minerals. This should include relevant legal provisions, actual disclosure practices and any reforms that are planned or underway. An overview of the contracts and licenses that are publicly available should be disclosed in the public domain and include a reference or link to the location where these are published. Suriname is encouraged to publish PSCs currently in force with relevant annexes, and to undertake a review of published mining and oil contracts ensuring that the published contracts are available in a centralized website which should be regularly updated. In accordance with Requirement 2.4.a, Suriname is required to disclose any contracts and licenses that are granted, entered into or amended from 1 January 2021</li> <li>In accordance with Requirement 2.5 and the Board-agreed framework for assessing progress, Suriname is required to disclose the beneficial owners of all companies holding or applying for extractive licenses by 31 December 2021. To achieve this target, the following measures are recommended: <ol style="list-style-type: none"> <li>Suriname is requested to agreed appropriate definitions for the terms "beneficial owner" and "politically exposed person".</li> <li>Suriname is expected to request all companies holding oil, gas and mining licenses to disclose BO information and provide adequate assurances for data reliability. The government is encouraged to establish a public register of beneficial owners which could be integrated into the Trade Register managed by the SCCI.</li> </ol> </li> </ol>		

- iii. Suriname is encouraged to require all applicants of oil, gas and mining licenses to disclose their beneficial owners at the application stage. An assessment of the comprehensiveness and reliability of this information should be integrated into the licensing procedures followed by the MONR or Staatsolie.
  - iv. Suriname is encouraged to agree priorities for BO disclosures and, based on these priorities, plan efforts to obtain this data. For example, Suriname may prioritise disclosures by certain types of companies holding a certain type of license or producing a certain commodity due to risks related to corruption and tax evasion. These priorities should guide outreach efforts to companies and provide them guidance.
  - v. It is recommended that Suriname considers using the EITI's model BO declaration form to ensure that disclosures are published in open data format, comparable and easy to analyse.
  - vi. Suriname may also wish to expand BO disclosures to other segments of the upstream extractive value chain, for instance through collection and disclosure of BO information from extractive-sector service providers to improve the public debate.
6. In accordance with requirement 2.6.a, Suriname should ensure that a comprehensive overview of Grassalco is publicly disclosed, including an explanation of the prevailing rules and practices related to Grassalco's retained earnings, reinvestment and third-party funding. The government should also ensure annual disclosure of a comprehensive account of any loans or loan guarantees extended by the state or Grassalco to mining, oil, and gas companies in line with Requirement 2.6.b. The terms of Staatsolie's participation in the Merian Gold Mine should be comprehensively disclosed. Suriname is required to clarify whether NV1 is a government-owned corporation, and whether it is a material state-owned enterprise.

## 3. Monitoring and production: Requirement 3

### 3.1 Overview

This section provides details on the implementation of the EITI requirements related to exploration, production and exports.

### 3.2 Assessment

#### Overview of the extractive sector, including exploration activities (#3.1)

##### Documentation of progress

The 2017 EITI Report provides an overview of the extractive industries, including significant exploration activities.

##### Stakeholder views

Some stakeholders consulted highlighted the existence of illegal mining in Suriname. Stakeholders did not express any other particular views on the comprehensiveness of the coverage of extractive industries and exploration activities in the 2017 EITI Report.

##### Initial assessment

The International Secretariat's initial assessment is that Suriname has made satisfactory progress towards meeting this requirement. The 2017 EITI Report provides an overview of the extractive industries, including significant exploration activities.

To strengthen implementation, Suriname may wish to expand its coverage of the mining sector by including informal and illegal activities<sup>84</sup> as well as more specific updates on estimated deposits.

#### Production data (#3.2)

##### Documentation of progress

The 2017 EITI Report discloses volumes and values of minerals and crude oil produced by commodity as reported by mining companies and Staatsolie, respectively, to the IA.

##### Stakeholder views

Several government and industry representatives confirmed that gold was the main mineral produced in 2017 with bauxite or alumina not being produced in Suriname since 2015. A government representative confirmed that while there is not record on other commodities produced in Suriname in 2017 different to the ones included in the report, it is unlikely that production of other minerals is material in comparison to gold. Stakeholders did not express any particular views on the disclosure of

<sup>84</sup> The ASM sector has been identified as a sector that “remains overwhelmingly informal”. See: IGF Mining Policy Framework Assessment. Suriname. (2017). p.26. Accessed on: <https://www.iisd.org/system/files/publications/suriname-mining-policy-framework-assessment-en.pdf> (last accessed on 25th November 2020).

oil production data by Staatsolie. Stakeholders confirmed that the main sources of production data are the material reporting companies covered in the Report. Representatives from the Central Bank and the General Bureau of Statistics (Statistics Office) confirmed that there is no mining production data publicly available for the year under review. A representative from the Central Bank however confirmed that they collect production figures. In addition, a government representative confirmed that GMD has among its tasks to collate production data from mining companies, but due to lack of personnel and capacity GMD has not been able to do that.

### Initial assessment

The International Secretariat's initial assessment is that Suriname has made satisfactory progress towards meeting this requirement. The 2017 EITI Report discloses volumes and values of minerals and crude oil produced by commodity as reported by mining companies and Staatsolie, respectively, to the IA. Gold was the main mineral produced under the year of review together with oil produced by Staatsolie. It is commendable that production data is published in open and format by the relevant government agency collecting this data such as the Central Bank or GMD.

To strengthen implementation, the government is encouraged to use EITI reporting as an annual diagnostic of the reliability of extractive production data with a view to supporting improvements in the monitoring of extractive companies' production.

### Export data (#3.3)

#### Documentation of progress

The 2017 EITI Report refers to different sources where export volumes and values for all extractive commodities exported are publicly accessible.

#### Stakeholder views

Stakeholders did not express any particular views on the disclosure of minerals and oil exports data. There was not consensus between stakeholders on whether Grassalco exported gold under the year of review. Representatives from the Central Bank confirmed that they collect and publish volumes and value data on mineral and oil exports on a regular basis.

### Initial assessment

The International Secretariat's initial assessment is that Suriname has made satisfactory progress in meeting this requirement. The 2017 EITI Report refers to different sources where export volumes and values for all extractive commodities exported in Suriname under the year of review are publicly accessible.

To strengthen implementation, Suriname is encouraged to strengthen the monitoring of gold exports by mining companies including Grassalco with a view to systematically disclosing export data for each extractive commodity on relevant government and company websites.

TABLE 3- SUMMARY INITIAL ASSESSMENT TABLE: MONITORING AND PRODUCTION

EITI provisions	Summary of main findings	International Secretariat's initial assessment of progress with the EITI provisions
Overview of the extractive sector, including exploration activities (#3.1)	The 2017 EITI Report provides an overview of the extractive industries, including significant exploration activities.	Satisfactory progress
Production data (#3.2)	The 2017 EITI Report refers to different sources where export volumes and values for gold and oil exported in Suriname under the year of review are publicly accessible being gold the material mineral exported in Suriname in 2017.	Satisfactory progress
Export data (#3.3)	The 2017 EITI Report refers to different sources where export volumes and values for all extractive commodities exported are publicly accessible.	Satisfactory progress
<p><b>Secretariat's recommendations:</b></p> <ol style="list-style-type: none"> <li>1. To strengthen implementation of Requirement 3.1, Suriname may wish to expand its coverage of the mining sector by including informal and illegal activities as well as more specific updates on estimated deposits.</li> <li>2. To strengthen implementation of Requirement 3.2, the government is encouraged to use EITI reporting as an annual diagnostic of the reliability of extractive production data with a view to supporting improvements in the monitoring of extractive companies' production.</li> <li>3. To strength implementation of Requirement 3.3, Suriname is encouraged to strengthen the monitoring of gold exports by mining companies including Grassalco with a view to systematically disclosing export data for each extractive commodity on relevant government and company websites.</li> </ol>		



## 4. Revenue collection: Requirement 4

### 1.1 Overview

This section provides details on the implementation of the EITI requirements related to revenue transparency, including the comprehensiveness, quality and level of detail disclosed. It also considers compliance with the EITI Requirements related to procedures for producing EITI Reports.

### 1.2 Assessment

#### Materiality (#4.1)

##### Documentation of progress

***Material revenue streams:*** The 2017 EITI Report notes that the MSG had decided that all revenue streams representing over 1% of total extractive revenue should be reconciled<sup>85</sup>. The reconciliation report includes a reference to an MSG meeting<sup>86</sup> that document discussions and decisions. The MSG decided to include nine revenue streams. The material revenue streams are described in the Report. It includes a mapping of all revenue streams and their relevant importance. Based on the provided information, it appears that revenue streams excluded from the scope of EITI reporting (import taxes, and other indirect taxes) are marginal and their omission does not materially affect the comprehensiveness of the report. Payments based on the Power Plant Agreement 1 by RGM are included in the report even when later the Government of Suriname transfers these payments to N.V. Energie Bedrijven Suriname (EBS), a fully state-owned power company, for capital investment.

***Material companies:*** Seven companies were considered material<sup>87</sup>. The report explains that the MSG decided that reconciliation should cover at least 75% of total extractive revenues. There was not an agreed threshold to distinguish between material and no material extractive companies. In that sense, the report does not demonstrate that a company accounting for more than a threshold of government extractives revenues was included in the scope of reporting. The report confirms that gold exporters (different to large gold companies) were not able to participate during the reconciliation even when royalties in cash paid by gold exporters were part of the reconciliation process. Reconciliation of royalties paid by gold exporters was made between data received from the MOF with data derived from the Central Bank that records royalty payments by gold exporters in their accounts. Data reported by the Central Bank is a combined value of royalty payments made by all gold exporters. Payments by gold exporters represented 6.2% of total extractive payments in 2017<sup>88</sup>. All the rest of companies submitted the requested data.

***Material government agencies:*** The EITI Report names one government entity, the MOF and the material revenues streams that it collects. It reveals that this government entity fully reported all receipts in accordance with the materiality definition and within the indicated timeframe<sup>89</sup>.

<sup>85</sup> 2017 EITI Report. p.3

<sup>86</sup> MSG Meeting on November 29, 2019.

<sup>87</sup> A group of 15 small-scale mining companies grouped under the SHMR reported social expenditures and gold production volumes in an aggregated way. There were not taxes or other payments covered by Requirement 4.1 reported by this group of ASM companies. .

<sup>88</sup> 2017 EITI Report. Appendix 2. P.5

<sup>89</sup> 2017 EITI Report. Appendix 2. P.2.

**Comprehensiveness:** Reconciliation covered 94% of all extractive revenue (including oil and mining). The reconciliation coverage thus exceeds the target of 75% set by the MSG. Based on the work undertaken by the IA, there is no indication that revenue streams exceeding 1% of total revenue was omitted.

**Discrepancies:** The EITI Report provides an explanation of the resolution of initial discrepancies, and the nature and value of final unreconciled discrepancies. Most discrepancies resulted from different exchange rates, timing and other technical differences in reporting. The Report includes an assessment of whether the final unreconciled discrepancies raise any questions about the comprehensiveness and reliability of reconciled financial data. Only one discrepancy related to surface rights payments by Grassalco was not resolved, yet considered not material by the IA. On royalties paid by gold exporters, the IA concluded its inability to provide assurance regarding the completeness of payments made by exporters as the was only able to review the Central Bank Credit Notes rather than reported payments by gold exporters themselves.

**Full government disclosure:** The government fully reported all revenues, including any revenues below the materiality thresholds and per revenue stream. The MOF systematically disclosed this data in its website.<sup>90</sup> The report notes that total government revenue from the extractive sector was SRD 1,8 million. The EITI Report includes a table with total government revenues from the extractives sector per revenue stream<sup>91</sup>.

## Stakeholder views

Government representatives and the IA clarified that the figure for total government revenue from the extractive sector included all payments made by mining and oil companies classified under the category of mining and quarrying. While it is not possible to distinguish payments based on mining activities from payments based on oil activities, a senior government representative noted that payments derived from large and medium-sized companies and small-scale gold mining activities is presented in a disaggregated way in the government website. Representatives from the MOF confirmed systematic disclosures of government revenues in a yearly basis disaggregated by revenue stream, by sector (mining and no mining), and by scale (large and small-scale mining). Stakeholders appeared assured that the scope of reconciliation included all material payments and revenue streams. Stakeholders confirmed that there were between five to six gold exporters in 2017. While gold exporters were not reporting companies, stakeholders seem to be satisfied with figures reported by the Central Bank. The IA confirmed that MSG's understanding is that gold exporters are not considered mining companies by Law thus it was challenging to enforce reporting on this group of companies. The IA said that for the MSG it is still relevant to consider gold exporters as reporting companies in the next reporting cycle provided challenges related to the definition of extractive companies that does not include gold exporters in the Law are addressed. The IA has confirmed that payments based on PPA1 by RGM were reconciled.

## Initial assessment

**The International Secretariat's assessment is that Suriname has made meaningful progress towards meeting this requirement.** Reconciliations appears to include all revenue streams. Materiality considerations for revenue stream are adequately documented in the 2017 EITI Report. A reporting threshold to confirm when a company should be considered material is not stated. Gold exporters who account for a share of royalties paid on gold production (produced by ASM) were not included in the

<sup>90</sup> See: [http://finance.gov.sr/media/1060/sme-gfs-tbls-publication\\_en\\_2017\\_191004-revised.pdf](http://finance.gov.sr/media/1060/sme-gfs-tbls-publication_en_2017_191004-revised.pdf)

<sup>91</sup> 2017 EITI Report. P.27

scope of reporting in 2017. Combined royalty payments by gold exporters seem material. The MSG does not appear to have assessed whether payments by any individual exporter exceeded the materiality threshold in 2017. The total weight of royalty payments made by these companies (6.2%) and the total number of companies (five to six) suggest that it is likely that some of them made material payments. While there is no indication to conclude that royalty payments data reported by the Central Bank is not accurate, data was reported in an aggregated way without identification of royalty payments per gold exporter. All material companies and government agency, the MOF, reported as requested. Total government revenues are disclosed by revenue stream.

In accordance with Requirement 4.1, Suriname should demonstrate that all material payments and revenues are comprehensively disclosed by government entities and extractive companies. In addition, Suriname should guarantee that any material omissions should be disclosed, and the non-reporting entities named. Suriname must assess whether gold exporters should be considered as material companies ahead of future EITI reporting.

## In-kind revenues (#4.2)

### Documentation of progress

The government has not collected in-kind revenues from any PSCs given that all oil production in Suriname to date has been from fields operated solely by Staatsolie in the year under review, as oil offshore production is yet to commence in Suriname. Staatsolie however produces oil from its onshore fields (as an equity holder) and supplies it to its domestic refinery. Therefore Requirement 4.2 is not yet applicable in the oil and gas sector.

The 2017 EITI Report makes a reference to royalty payments made in-kind as physical gold made by RGM to Grassalco. Volumes of in-kind revenues in the form of gold and silver collected by Grassalco are disclosed. RGM disclosed volumes of in-kind payments made to Grassalco. The report shows a reconciliation of volumes of in-kind revenues and payments in 2017. Volumes of in-kind revenues in the form of gold sold and unsold were also disclosed by Grassalco. Proceeds of the sales of in-kind revenues in the form of gold were disclosed by Grassalco, and the MOF<sup>92</sup>. Proceeds of the sales of in-kind revenues in the form of silver were not reported. The report does not provide disclosures broken down by individual buying company. Buying companies were not included in the reporting process thus there was not reconciliation of volumes sold and revenues received.

### Stakeholder views

A stakeholder confirmed that Grassalco provided sufficient information related to royalties in kind sold, and proceeds of the sales of gold to the IA, and that this information is reflected in Grassalco's Annual Report yet not publicly available. The IA noted that silver collected does not seem material in comparison to gold. Government representatives confirmed that Staatsolie did not receive any payment in-kind as a government fiscal agent.

### Initial assessment

The International Secretariat's initial assessment is that Suriname has made meaningful progress in meeting this requirement. The government appears to have collected revenues in-kind only in the gold mining sector, not yet in oil and gas, in 2017. The 2017 EITI Report discloses volumes sold and

<sup>92</sup> 2017 EITI Report. pp.59-60.

revenues received for the gold sold under the year of review. The report does not provide disclosures broken down by individual buying company. Volumes sold and revenues received for silver were not disclosed. There is no evidence of an MSG agreement related to the materiality of silver collected.

In accordance with Requirement 4.2, the MSG should agree whether the sale of the state's share of production or other revenues collected in kind is material. Suriname is required to disclose the volumes sold and revenues received, disaggregated by individual company and to levels commensurate with the reporting of other payments and revenue streams. Reporting could also break down disclosures by the type of product, price, market and sale volume. The MSG is encouraged to task the IA with reconciling the volumes sold and revenues received by including the buying companies in the reporting process.

## Barter and infrastructure transactions (#4.3)

### Documentation of progress

There is no indication of the existence of infrastructure provisions and barter arrangements in Suriname. This was confirmed by the 2017 EITI Report, therefore this Requirement was considered not applicable. There is not however an explanation on how EITI Report concludes that #4.3 is not applicable.

### Stakeholder views

The IA confirmed that they were not aware of any barter and infrastructure transactions in Suriname. There were no other particular stakeholder views on the presence or absence of barter and infrastructure transactions in Suriname.

### Initial assessment

The International Secretariat's initial assessment is that Requirement 4.3 is not applicable in Suriname. The 2017 EITI Report confirms that infrastructure provisions and barter agreements were not applicable in Suriname in 2017.

## Transport revenues (#4.4)

### Documentation of progress

There is no indication of the government receiving material revenues from the transportation of extractive resources. This was confirmed by the 2017 Report. There is not however an explanation on how EITI Report concludes that #4.4 is not applicable. While the 2018 Staatsolie Report confirms that the Staatsolie provides transportation services as part of contracts with customers when providing oil products, there is no evidence that Staatsolie provided these transportation services in 2017.

## Stakeholder views

Government representatives confirmed that Staatsolie transported crude oil to the refinery with the government subsidizing these payments thus they noted there were not transportation revenues in Suriname under the year of review from Staatsolie to the Government of Suriname. There were no other particular stakeholder views on the presence or absence of transport revenues in Suriname.

## Initial assessment

The International Secretariat's initial assessment is that the requirement is not applicable in Suriname. The 2017 EITI Report confirms that transport revenues did not exist in Suriname in 2017.

To strengthen implementation, the MSG is encouraged to review on an annual basis the existence of any transport revenues collected by government or SOEs from the transportation of extractive commodities, particularly as offshore oil production commences in coming years.

## Transactions between SOEs and government (#4.5)

### Documentation of progress

The 2017 EITI Report does not confirm whether mining, oil, and gas companies made any tax or non-tax payments to Staatsolie under the year of review. The 2017 Staatsolie Annual Report confirms that Staatsolie received cash income from Surgold JV for the 25% interest participation it held in the Merian Gold Mine for an amount of USD 46m which represented 11% of total gross revenues generated by Staatsolie<sup>93</sup>. The report confirms that RGM made material royalty payments in-kind to Grassalco and these payments were comprehensively reconciled (See Requirement 4.2).

In terms of SOE's transactions with the government, the report confirms that Staatsolie made dividend payments to the Government of Suriname and provides the results of reconciliation of dividend payments to the government in 2017. Apart from dividends, there is no evidence of additional payments made by Staatsolie to the government. On the other hand, there is no indication of material payments in 2017 from Grassalco to the government, it is unclear whether the SOE made any payments of dividends or other to government in 2017.

On government transfers to SOEs, the Report confirms that there were government transfers to Staatsolie to fund the SOE's share of cash calls in oil and gas projects in which it participates. These financial transfers were not reconciled (See Requirement 2.6). On proceeds from petroleum products, Staatsolie entered a deal to trade petroleum products on behalf of the government for which it receives a sales commission that is deducted from the sales price<sup>94</sup>. These government transfers to Staatsolie are reliably disclosed in the 2017 EITI Report. There is no evidence of other government transfers to Staatsolie. There is no indication that the government made transfers to Grassalco.

<sup>93</sup> 2017 Staatsolie Annual Report. P.14

<sup>94</sup> 2017 EITI Report. Pp.71-72.

## Stakeholder views

Oil Industry stakeholders noted that no tax or non-tax payments have been made to Staatsolie as oil production had not commenced yet. A stakeholder confirmed that Staatsolie did not receive subsidies from the Government of Suriname during the year under review.

## Initial assessment

The International Secretariat's initial assessment is that Suriname has made meaningful progress in meeting this requirement. The role of the two SOE's operating in the extractive industries in Suriname, Staatsolie and Grassalco, is disclosed in the 2017 EITI Report. The report does not confirm whether mining, oil, and gas companies made any tax or non-tax payments to Staatsolie under the year of review. The International Secretariat's understanding is that there was no oil offshore production in 2017 thus Staatsolie did not receive payments as a fiscal agent from oil companies. Staatsolie however received mining revenues from its participation in the Merian Gold Mine, however these payments were not disclosed or reconciled in the 2017 EITI Report. Dividends paid by Staatsolie are disclosed. As noted in Requirement 2.6, the practice of Staatsolie's financial relations with government is clear from the EITI Report combined with Staatsolie's annual report and financial statements. There is limited publicly accessible information on Grassalco. The International Secretariat was not able to confirm whether there were any transactions between Grassalco and the Government of Suriname apart from the SOE's transfer of the proceeds of the sale of in-kind gold revenue to the government. However, gaps in coverage of Grassalco's transactions should be considered in the context of the low materiality of transactions involving Grassalco, whose activities are primarily focused on crushed stone quarrying.

In accordance with Requirement 4.5, Suriname must ensure that the EITI reporting process comprehensively includes material payments to SOEs from oil, gas and mining companies, and transfers between SOEs and other government agencies. In particular, Suriname should ensure that all material dividends collected by SOEs such as Staatsolie from extractive companies such as Surgold JV be comprehensively and reliably disclosed.

## Subnational direct payments (#4.6)

### Documentation of progress

There is no indication of the existence of direct subnational payments from companies to subnational government entities in the 2017 EITI Report. The report confirms that this requirement is not applicable, albeit without an explanation of the basis for this assessment.

## Stakeholder views

Government and industry representatives confirmed that there are not subnational direct payments in Suriname.

## Initial assessment

The International Secretariat's initial assessment is that Requirement 4.6 is not applicable in Suriname. The 2017 EITI Report confirms the lack of direct subnational payments by extractive companies in 2017.



To strengthen implementation, Suriname is encouraged to review the existence of direct subnational payments by extractive companies ahead of annual EITI reporting.

## Level of disaggregation (#4.7)

### Documentation of progress

The financial data disclosed is disaggregated by individual company, government entity and revenue stream. There is no definition of “project” developed by the MSG or other progress in terms of project level reporting.

### Stakeholder views

A government representative noted that the two large mining companies in Suriname operate a single mine, which means that these companies de facto are reporting CIT, and royalties on a project-level basis. A few oil companies confirmed that once oil production commences, these companies will pay taxes and royalties per block, according to each PSC. The NS confirmed that there is no definition of project developed by the MSG, and that this topic has not been discussed within the MSG.

### Initial assessment

The International Secretariat’s initial assessment is that Suriname has made satisfactory progress in meeting this requirement. Reconciled financial data in the 2017 EITI Report is presented disaggregated by company, revenue stream and collecting government entity. The lack of disaggregation of payments made by gold exporters is reflected in the assessment of Requirement 4.1.

To strengthen implementation, Suriname is urged to ensure project-level reporting for all payments and revenues levied on a per-project basis for EITI reporting from 2018 onwards.

## Data timeliness (#4.8)

### Documentation of progress

The 2017 EITI Report was published in December 2019, in line with Requirement 4.8.

### Stakeholder views

The national secretariat explained that procurement of the IA slowed the process to complete the first EITI Report. The IA added that there were some challenges in collecting data from reporting companies and government agencies. However, the 2017 EITI Report was adequately published on time, the IA explained. COVID-19 is slowing the process of elaboration of the third EITI Report according to stakeholders consulted.

## Initial assessment

The International Secretariat's initial assessment is that Suriname has made satisfactory progress towards meeting this requirement. Despite delays with the publication of the 2016 EITI Report, the 2017 EITI Report was published within two years of the end of the fiscal period covered.

To strengthen implementation, Suriname is encouraged to consider opportunities for strengthening systematic disclosures with a view to further improving the timeliness of disclosures of data required by the EITI Standard.

## Data quality (#4.9)

### Documentation of progress

The IA has made an assessment on whether disclosures are subject to credible, independent audit, applying international auditing standards. The IA expressly confirmed that procedures were not designed to constitute an audit. There is the IA's opinion regarding reconciliation including discrepancies. From January to March 2018, the MSG discussed on the appointment of the IA who is perceived by the MSG to be credible, trustworthy and technically competent. The ToRs for the EITI Report agreed between the MSG and the IA is based on the standard ToRs and the 'agreed upon procedure for EITI Reports' endorsed by the EITI Board. Nontrivial deviations from the ToRs agreed for the IA, compared to the standard ToRs approved by the EITI Board have been raised by the IA. There were not material deviations from the agreed ToRs in practice identified by the IS. The Report confirms that the MSG has agreed on the assurances to be provided by the participating companies to guarantee the credibility of the data. Extractive companies were required to provide a copy of audited financial statements. While all reporting companies provided their financial statements, most of these financial statements were unqualified. The report noted that the group of 15 companies within the SHMR do not provided financial statements. For government agencies, quality assurances required from the MOF are not clear. It seems that the MOF did not provide assurances on the revenue streams reported. The IA confirmed in the EITI Report that if there are material receipts or payments omitted, or not reflected due to the nature of a transaction, in the reporting templates, by both the paying in receiving entities, the work carried out by the IA would not be sufficient to detect them.

### Stakeholder views

The IA explained that quality assurances procedures for EITI reporting had been designed based on the request of audited financial statements for companies. In terms of companies' audit and assurance practices, industry representatives confirmed that copies of financial statements were shared with the IA, and the IA reconfirmed that. The IA noted that BDO is not able to guarantee data quality, and it is limited to confirm that assurance procedures for companies data established in advanced by the MSG were followed.

The IA explained that the MOF's accounts were not audited in 2017. The IA noted that no data assurances were provided by the MOF. The IA highlighted that BDO is not able to guarantee data quality of the MOF. On royalty payments by gold exporters, the IA said that despite the lack of participation of gold exporters in the reporting process, they are confident that data shared by both the Central Bank and the MOF are reliable.

Stakeholders across constituencies considered the IA professional and credible. The NS and stakeholders consulted confirmed that EITI-SR hired BDO considering their satisfaction with the work's

firm with the 2016 EITI Report. The IA confirmed that while they consider that material payments and revenues are effectively covered by the 2017 EITI Report, they are not able to provide assurance about the reliability of the data considering the limitations of their assignment as, they noted, this was not an audit process.

Stakeholders did not express any particular views on recommendations provided by the IA in the 2017 and 2016 EITI Reports.

### Initial assessment

The International Secretariat's initial assessment is that Suriname has made meaningful progress towards meeting this requirement. There is evidence that the MSG oversaw the Independent Administrator procurement process. The ToRs for the EITI Report agreed between the MSG and the IA are in line with the standard ToRs and the 'agreed upon procedure for EITI Reports' endorsed by the EITI Board. There were not material deviations from the agreed ToRs in practice identified by the International Secretariat. For reporting companies, the report clearly states which companies provided financial statements, as well as compliance with assurance agreed by the MSG. For the MOF, the only reporting government agency, the 2017 EITI Report confirms that there were no assurances requested nor provided for the revenues reported by the MOF. MSG members consulted considered the IA to be credible and competent. The EITI Report does not include the IA's assessment of comprehensiveness and data reliability, but there is no indication of the data not being reliable and comprehensive. There evidence that the MSG discussed and approved the reporting templates.

In accordance with Requirement 4.9, Suriname should ensure that future EITI Reports include a clear assessment of the IA on the comprehensiveness and data reliability. The MSG must clearly agree what assurances should be provided by the MOF, and later assess the compliance with the assurance agreed. The MSG is encouraged to document the audit policy and practice of the MOF.

TABLE 4- SUMMARY INITIAL ASSESSMENT TABLE: REVENUE COLLECTION

EITI provisions	Summary of main findings	International Secretariat's initial assessment of progress with the EITI provisions
Comprehensiveness (#4.1)	Reconciliations appears to include all revenue streams. Materiality considerations are adequately documented in the 2017 EITI Report. A reporting threshold in terms of a company's total payments to government is not stated. Gold exporters who account for a share of royalties paid on gold production (produced by ASM) were not included in the scope of reporting in 2017. Combined royalty payments by gold exporters seem material. The MSG does not appear to have assessed whether payments by any individual exporter exceeded the materiality threshold in 2017. The total weight of royalty payments made by these companies and the total number of companies suggest that it is likely that some of them made material payments. Data reported by the Central Bank was reported in an aggregated way without identification of royalty payments per gold exporter. All material companies and	Meaningful progress

	government agency, the MOF, reported as requested. Total government revenues are disclosed by revenue stream.	
In-kind revenues (#4.2)	The 2017 EITI Report discloses volumes sold and revenues received for the gold sold under the year of review. The Report does not provide disclosures broken down by individual buying company. Volumes sold and revenues received for silver was not disclosed. There is no evidence of an MSG agreement related to the materiality of silver collected albeit stakeholders confirmed the lack of materiality of silver in-kind payments.	Meaningful progress
Barter and infrastructure transactions (#4.3)	The International Secretariat's initial assessment is that the requirement is not applicable in Suriname.	Not applicable
Transport revenues (#4.4)	The International Secretariat's initial assessment is that the requirement is not applicable in Suriname.	Not applicable
Transactions between SOEs and government (#4.5)	The role of the two SOE's operating in the extractive industries in Suriname, Staatsolie and Grassalco, is disclosed in the 2017 EITI Report. The report does not confirm whether mining, oil, and gas companies made any tax or non-tax payments to Staatsolie under the year of review. Staatsolie received mining revenues from its participation in the Merian Gold Mine, however these payments were not disclosed or reconciled in the EITI Report. Dividends paid by Staatsolie are disclosed. As noted in Requirement 2.6, the practice of Staatsolie's financial relations with government is clear from the EITI Report combined with Staatsolie's annual report and financial statements. There is limited publicly accessible information on Grassalco. The International Secretariat was not able to confirm whether there were any transactions between Grassalco and the Government of Suriname apart from the SOE's transfer of the proceeds of the sale of in-kind gold revenue to the government. However, gaps in coverage of Grassalco's transactions should be considered in the context of the low materiality of transactions involving Grassalco, whose activities are primarily focused on crushed stone quarrying.	Meaningful progress
Subnational direct payments (#4.6)	The International Secretariat's initial assessment is that the requirement is not applicable in Suriname.	Not applicable
Level of disaggregation (#4.7)	Reconciled financial data in the 2017 EITI Report is presented disaggregated by company, revenue flow and collecting government entity.	Satisfactory progress
Data timeliness (#4.8)	Even when there was a delay with the publication of the 2016 EITI Report, the 2017 EITI Report was published on time which shows the willingness to meet the timeliness requirement.	Satisfactory progress
Data quality (#4.9)	There is evidence that the MSG oversaw the Independent Administrator procurement process. The ToRs for the EITI Report agreed between the MSG and the IA are in line with the standard ToRs and the 'agreed upon procedure for EITI Reports' endorsed by the EITI Board. There were not material deviations from the agreed ToRs in practice identified by the International Secretariat. For reporting companies, the report clearly states which companies provided financial statements, as well as compliance with assurance agreed by the MSG. For the MOF, the only government reporting agency, the 2017 EITI Report confirms there were	Meaningful progress

	<p>no assurances requested nor provided for the revenues reported. MSG members consider the IA to be credible and competent. The EITI Report does not include the IA's assessment of comprehensiveness and data reliability, but there is no indication of the data not being reliable and comprehensive. There is evidence that the MSG discussed and approved the reporting templates.</p>	
<p><b>Secretariat's recommendations;</b></p> <ol style="list-style-type: none"> <li>1. In accordance with Requirement 4.1, Suriname should demonstrate that all material payments and revenues are comprehensively disclosed by government entities and extractive companies. In addition, Suriname should guarantee that any material omissions should be disclosed, and the non-reporting entities named. Suriname must assess whether gold exporters should be considered as material companies ahead of future EITI reporting.</li> <li>2. In accordance with Requirement 4.2, the MSG should agree whether the sale of the state's share of production or other revenues collected in kind is material. Suriname is required to disclose the volumes sold and revenues received, disaggregated by individual company and to levels commensurate with the reporting of other payments and revenue streams. Reporting could also break down disclosures by the type of product, price, market and sale volume. The MSG is encouraged to task the IA with reconciling the volumes sold and revenues received by including the buying companies in the reporting process.</li> <li>3. To strengthen implementation of Requirement 4.4, the MSG is encouraged to review on an annual basis the existence of any transport revenues collected by government or SOEs from the transportation of extractive commodities, particularly as offshore oil production commences in coming years</li> <li>4. In accordance with Requirement 4.5, the MSG must ensure that the reporting process comprehensively include material payments to SOEs from oil, gas and mining companies, and transfers between SOEs and other government agencies. In particular, Suriname should ensure that all material dividends collected by SOEs such as Staatsolie from extractive companies such as Surgold JV be comprehensively and reliably disclosed.</li> <li>5. To strengthen implementation of Requirement 4.6, Suriname is encouraged to review the existence of direct subnational payments by extractive companies ahead of annual EITI reporting.</li> <li>6. To strengthen implementation of Requirement 4.7, Suriname is urged to ensure project-level reporting for all payments and revenues levied on a per-project basis for EITI reporting from 2018 onwards.</li> <li>7. To strengthen implementation of Requirement 4.8, Suriname is encouraged to consider opportunities for strengthening systematic disclosures with a view to further improving the timeliness of disclosures of data required by the EITI Standard.</li> <li>8. In accordance with Requirement 4.9, Suriname should ensure that future EITI Reports include a clear assessment of the IA on the comprehensiveness and data reliability. The MSG must clearly agree what assurances should be provided by the MOF, and later assess the compliance with the assurance agreed. The MSG is encouraged to document the audit policy and practice of the MOF.</li> </ol>		

## 2. Revenue management and distribution: Requirement 5

### 2.1 Overview

This section provides details on the implementation of the EITI requirements related to revenue management and distribution.

### 2.2 Assessment

#### Distribution of revenues (#5.1)

##### Documentation of progress

The 2017 EITI Report details the extractive industry revenues that are recorded in the national budget (direct taxes, indirect taxes, non-tax revenues, and other contract-base revenues)<sup>95</sup>. It confirms that there are no earmarked revenues to specific projects or sub-national budgets. The report notes that royalties collected in-kind as gold by Grassalco on behalf of the MOF are not recorded in the budget<sup>96</sup>. Proceeds from the sale of in-kind revenues however are recorded. The national budget disaggregates revenues between mining (oil, bauxite, gold and mining quarrying sectors) and non-mining but there is no indication that royalties in kind are included in the “non-tax mining revenues” type<sup>97</sup>. While the allocation of these revenues is broadly explained, there are no links provided to relevant financial reports. The 2017 Savings and Stabilisation Fund Law through which Suriname will manage some revenues from the extractive industries is not yet operational.

The MSG has referenced GFS as the national revenue classification systems.

##### Stakeholder views

A government representative noted that all extractive industry revenues are recorded in the national budget, but that the budget does not disaggregate between oil and mining revenues. The IA and a government representative noted that in-kind gold royalties paid by RGM to Grassalco (on behalf of MOF) are not reflected in the national budget. Proceeds from the sale of gold by Grassalco were however recorded in the national budget in 2017.

##### Initial assessment

The International Secretariat’s initial assessment is that Suriname has made satisfactory progress in meeting this requirement. The 2017 EITI Report states that all government extractive revenues are recorded in the national budget and provides an overview of the national revenue classification system. While the in-kind gold royalties collected by Grassalco on behalf of the MOF are not explicitly recorded in the national budget, the report states that the proceeds of the sale of that gold transferred by Grassalco to the MOF are indeed recorded in the national budget.

<sup>95</sup> 2017 EITI Report. p.32

<sup>96</sup> 2017 EITI Report. p.80

<sup>97</sup> Tables Government Finance Statistics 2017. Table 2.1.1. Suriname: Government revenues from mining and non-mining, 2017 (SRD million), Table 2.1.3. Suriname: Mining revenues on adjusted cash basis by revenue stream, 2017 (SRD million). Accessed on: [http://finance.gov.sr/media/1060/sme-gfs-tbls-publication\\_en\\_2017\\_191004-revised.pdf](http://finance.gov.sr/media/1060/sme-gfs-tbls-publication_en_2017_191004-revised.pdf) (last accessed on 25 November 2020).



To strengthen implementation, it is recommended that mining, and oil revenues are recorded separately in the national budget of Suriname. Suriname may wish to consider the extent to which implementation of extractive-specific national revenue classification systems, building on the extractive-specific GFS classifications used for EITI summary data, could support the transition towards systematically distinguishing extractive revenues in the government's budget documents.

## Sub-national transfers (#5.2)

### Documentation of progress

There is no indication that subnational transfers exist in Suriname. This was confirmed by the 2017 EITI Report, therefore this Requirement was considered not applicable. There is not however an explanation on how EITI Report concludes that Requirement 5.2 is not applicable.

### Stakeholder views

The IA and a government representative consulted confirmed the lack of transfers of extractive industry revenues between national and subnational government entities.

### Initial assessment

The International Secretariat's initial assessment is that Requirement 5.2. is not applicable to Suriname. Subnational transfers related to extractive revenues do not appear to exist in Suriname in 2017, as confirmed in the 2017 EITI Report.

## Additional information on revenue management and expenditures (#5.3)

### Documentation of progress

The 2017 EITI Report does not refer to any extractives revenues earmarked for specific programmes or regions. No additional information on projected production, commodity prices or revenue forecasts is provided.

### Stakeholder views

Stakeholders did not express any particular comment on the 2017 EITI Report's coverage of the budget-making and auditing practices.

### Initial assessment

Reporting on revenue management and expenditures is encouraged but not required by the EITI Standard and progress with this requirement will not have any implications for a country's EITI status,

Apart from a general and broad description of the budgeting process, the 2017 EITI report does not contain information on the budget audit process, or information related to the management of extractive sector revenue and related expenditures.

To strengthen implementation in accordance with Requirement 5.3, Suriname is encouraged to include information on the budget audit process, and information related to the management of extractive sector revenue and related expenditures in further reports, and through other publicly available government websites.

**TABLE 5 - SUMMARY INITIAL ASSESSMENT TABLE: REVENUE MANAGEMENT AND DISTRIBUTION**

EITI provisions	Summary of main findings	International Secretariat's initial assessment of progress with the EITI provisions
Distribution of revenues (#5.1)	The 2017 EITI Report states that all government extractive revenues are recorded in the national budget and provides an overview of the national revenue classification system. While the in-kind gold royalties collected by Grassalco on behalf of the MOF are not explicitly recorded in the national budget, the Report states that the proceeds of the sale of that gold transferred by Grassalco to the MOF are indeed recorded in the national budget.	Satisfactory progress
Sub-national transfers (#5.2)	The International Secretariat's initial assessment is that the requirement is not applicable in Suriname.	Not applicable
Information on revenue management and expenditures (#5.3)	Apart from a general and broad description of the budgeting process, the International Secretariat's view is that EITI report does not contain information on the budget audit process, or information related to the management of extractive sector revenue and related expenditures.	
<p><b>Secretariat's recommendations:</b></p> <ol style="list-style-type: none"> <li>1. To strengthen implementation of Requirement 5,1, it is recommended that mining, and oil revenues are recorded separately in the national budget of Suriname. Suriname may wish to consider the extent to which implementation of extractive-specific national revenue classification systems, building on the extractive-specific GFS classifications used for EITI summary data, could support the transition towards systematically distinguishing extractive revenues in the government's budget documents.</li> <li>2. To strengthen implementation in accordance with Requirement 5.3, Suriname is encouraged to include information on the budget audit process, and information related to the management of extractive sector revenue and related expenditures in further reports, and through other publicly available government websites.</li> </ol>		

### 3. Social and economic spending: Requirement 6

#### 3.1 Overview

This section provides details on the implementation of the EITI requirements related to social and economic spending (SOE quasi-fiscal expenditures, social expenditures and contribution of the extractive sector to the economy).

#### 3.2 Assessment

##### Social expenditures (#6.1)

###### Documentation of progress

The 2017 EITI Report seems to confirm that social expenditures mandated by contracts exist in the mining and oil sectors in Suriname, however it does not clearly list the contractual provisions related to mandatory social expenditures in mining, oil and gas. While social expenditures are disclosed for mining and oil, these are not clearly distinguished between mandatory and voluntary. For mining, the 2017 EITI Report provides a list of social expenditures corresponding to RGM and Newmont. It is not clear whether these social expenditures are mandated by contracts or were undertaken as part of their (voluntary) corporate social responsibility programmes. Voluntary social expenditures have been disclosed by small-scale mining companies, although in an aggregated way. For oil, the 2017 EITI Report provides a list of social expenditures corresponding to Kosmos, Petronas, and Tullow. It is not clear whether these social expenditures are mandated by contracts or were undertaken as part of their (voluntary) corporate social responsibility programmes. There is no evidence of an MSG agreement on a definition of materiality with regards to mandatory social expenditures. It appears that the MSG in practice considered all mandatory social expenditures to be material. There is no disclosure of non-government beneficiaries for mandatory social expenditures, except for the only in-kind expenditure undertaken by RGM.

###### Stakeholder views

All industry representatives from the oil sector confirmed that there are mandatory social expenditures contractually required in their PSCs. Industry representatives from the mining sector confirmed the existence of mandatory social expenditures derived from their mineral agreements. An industry representative confirmed the existence of social payments to the Pamaka Newmont-Community Development Fund as part of the Cooperation Agreement signed with the Pamakan community in 2016, and Newmont's commitment mandated by the 2013 Mineral Agreement. The IA noted that there had been no discussion of disclosures of beneficiaries for mandatory social expenditures undertaken by extractive companies.

###### Initial assessment

The International Secretariat's initial assessment is that Suriname has made inadequate progress towards meeting this requirement. While the 2017 EITI Report states the existence of social expenditures mandated by contracts for mining and oil in the period under review, the disclosure of mandatory social expenditures is not disaggregated by type of payment - distinguishing between cash

and in-kind, expect for RGM, and the beneficiary(ies) of these social expenditures were not disclosed where these were third parties. The report does not confirm whether social expenditures mandate by Law exist in Suriname.

In accordance with Requirement 6.1, Suriname should ensure that a clear definition of any mandatory social expenditures mandated by law or contract is publicly provided and assess the materiality of such expenditures in the period under review. Suriname may wish to consider the extent to which disclosure of PSCs would be necessary to provide a comprehensive overview of all mandatory social expenditures in the oil sector. Suriname should ensure that public disclosure of mandatory social expenditures be disaggregated by type of payment (distinguishing cash and in-kind) and beneficiary, clarifying the name and function of any non-government (third-party) beneficiaries of mandatory social expenditures.

## SOE quasi-fiscal expenditures (#6.2)

### Documentation of progress

The 2017 EITI Report does not refer to quasi-fiscal expenditures but provides a confirmation that Grassalco<sup>98</sup> and Staatsolie<sup>99</sup> reported a lack of social expenditures undertaken under the year of review. There is no evidence in meeting minutes of the MSG's discussions on the existence of quasi-fiscal expenditures.

### Stakeholder views

A Staatsolie's representative referred to social expenditures undertaken by the SOE to support corporate social responsibility. Staatsolie's 2017 Annual Report confirms that Staatsolie changed its policy regarding corporate social investments to focus on sustainable development activities within the communities near where they operate, but it does not explicitly refer to whether quasi-fiscal expenditures were made in 2017. An IMF Working Paper from 2015 on energy subsidies in Latin America and the Caribbean, based on 2011 data, confirms the existence of cross subsidies and transfers between Staatsolie, EBS, and the Government of Suriname where EBS's purchases of oil from Staatsolie for thermal generation is covered indirectly by the government by netting out the cost with Staatsolie's dividend payments to the Government of Suriname<sup>100</sup>. There is no clarity on whether these expenditures represent quasi-fiscal expenditures or even if these expenditures existed in 2017.

A SOE representative consulted noted that it might be possible that Grassalco undertakes quasi-fiscal expenditures, although there was no clarity from consultations about the type of quasi-fiscal expenditures by Grassalco. Grassalco's 2017 Annual Report is not publicly available.

### Initial assessment

The International Secretariat's initial assessment is that Suriname has made no progress towards meeting this requirement. The 2017 EITI Report does not refer to quasi-fiscal expenditures and there is insufficient information on SOEs in the report and other public documents to determine the

<sup>98</sup> 2017 EITI Report. p.68

<sup>99</sup> 2017 EITI Report. p.73

<sup>100</sup> Di Bella, Gabriel; Lawrence, Norton; and others. (2015). IMF Working Paper. Energy Subsidies in Latin America and the Caribbean: Stocktaking and Policy Challenges. p.65. Accessed on: <https://www.imf.org/external/pubs/ft/wp/2015/wp1530.pdf>

existence of any such expenditures. There is no evidence that the MSG has considered the existence of quasi-fiscal expenditures in preparing the EITI Report. There was a lack of clarity from stakeholders consulted on whether any quasi-fiscal expenditures related to extractive revenues existed in 2017.

In accordance with Requirement 6.2, Suriname should undertake a comprehensive review of all expenditures undertaken by extractives SOEs that could be considered quasi-fiscal expenditures. Suriname should develop a reporting process for quasi-fiscal expenditures with a view to achieving a level of transparency commensurate with other payments and revenue streams.

## Contribution of the extractive sector to the economy (#6.3)

### Documentation of progress

The required information is publicly available, apart from employment data. However, reporting oil and mining companies, except SHMR companies, have disclosed the number of their employees. The 2017 EITI Report notes that the number of people employed either formally or informally by the extractive industries is unclear. The EITI Report does not explain any constraints that would hinder disclosure of more comprehensive information on the extractive industries' contribution to employment. A 2018 World Bank document indicates that mining and agriculture accounting for an estimated 40% of total employment in Suriname including the informal sector<sup>101</sup>. There is not a comprehensive coverage of ASM data.

### Stakeholder views

Government representatives consulted confirmed that ASM is an important sector in Suriname, but there is not concrete and detailed data on estimates available.

### Initial assessment

The International Secretariat's initial assessment is that Suriname has made meaningful progress towards meeting this requirement. The 2017 EITI Report provides the extractive industries' contribution, in absolute and relative terms, to GDP, government revenues and exports, as well as an overview of the location of extractive activities. However, extractive employment data in either absolute or relative terms is not publicly available. Estimates of artisanal and small-scale mining activities are not publicly available despite the importance of ASM in Suriname. Given the existence of third-party data on mining employment and the export of some artisanal produced mineral commodities, the International Secretariat considers that it would have been possible to include estimates in Suriname's EITI reporting.

In accordance with Requirement 6.3, Suriname should disclose employment in the extractive industries in absolute terms and as a percentage of the total employment. Given the importance of artisanal mining for Suriname's economy, Suriname should also provide estimates of informal extractive activities, including artisanal and small-scale mining, in future EITI reporting.

<sup>101</sup> World Bank. Suriname Project Information Document/Integrated safeguards Data Sheet (PID/ISDS). <http://documents1.worldbank.org/curated/en/346811533735889222/pdf/Concept-Project-Information-Document-Integrated-Safeguards-Data-Sheet-Facilitating-Private-Investment-and-Sector-Diversification-P166187.pdf> p.7.

TABLE 6- SUMMARY INITIAL ASSESSMENT TABLE: SOCIAL AND ECONOMIC SPENDING

EITI provisions	Summary of main findings	International Secretariat's initial assessment of progress with the EITI provisions
Social expenditures (#6.1)	While the 2017 EITI Report states the existence of social expenditures mandated by contracts for mining and oil in the period under review, the disclosure of mandatory social expenditures is not disaggregated by type of payment - distinguishing between cash and in-kind, except for RGM, and the beneficiary(ies) of these social expenditures were not disclosed where these were third parties. The report does not confirm whether social expenditures mandate by Law exist in Suriname.	Inadequate progress
SOE quasi fiscal expenditures (#6.2)	The 2017 EITI Report does not refer to quasi-fiscal expenditures and there is insufficient information on SOEs in the report and other public documents to determine the existence of any such expenditures. There is no evidence that the MSG has considered the existence of quasi-fiscal expenditures in preparing the EITI Report. There was a lack of clarity from stakeholders consulted on whether any quasi-fiscal expenditures related to extractive revenues existed in 2017.	No progress
Contribution of the extractive sector to the economy (#6.3)	All required information is disclosed, apart from employment data required as requested by Requirement 6.3.d.	Meaningful progress
<p><b>Secretariat's recommendations:</b></p> <ol style="list-style-type: none"> <li>1. In accordance with Requirement 6.1, Suriname should ensure that a clear definition of any mandatory social expenditures mandated by law or contract is publicly provided and assess the materiality of such expenditures in the period under review. Suriname may wish to consider the extent to which disclosure of PSCs would be necessary to provide a comprehensive overview of all mandatory social expenditures in the oil sector. Suriname should ensure that public disclosure of mandatory social expenditures be disaggregated by type of payment (distinguishing cash and in-kind) and beneficiary, clarifying the name and function of any non-government (third-party) beneficiaries of mandatory social expenditures.</li> <li>2. In accordance with Requirement 6.2, Suriname should undertake a comprehensive review of all expenditures undertaken by extractives SOEs that could be considered quasi-fiscal expenditures. Suriname should develop a reporting process for quasi-fiscal expenditures with a view to achieving a level of transparency commensurate with other payments and revenue streams.</li> <li>3. In accordance with Requirement 6.3, Suriname should disclose employment in the extractive industries in absolute terms and as a percentage of the total employment. Given the importance of artisanal mining for Suriname's economy, Suriname should also provide estimates of informal extractive activities, including artisanal and small-scale mining, in future EITI reporting.</li> </ol>		



## Part IV – Outcomes and Impact

### 4. Outcomes and Impact: Requirement 7

#### 4.1 Assessment

##### Public debate (#7.1)

##### Documentation of progress

The 2017 EITI Report is comprehensible and publicly accessible. Due to the technicalities it covers, the vast amount of data provided and some of the language chosen, there are certain parts of the report which are not very easy to comprehend for those who are unfamiliar with the extractive industries. The 2017 EITI Report has been published in English, while the one covering fiscal year 2016 was published in both English and Dutch. So far, no EITI Reports or EITI-SR data have been translated in any of the local languages spoken in the hinterlands.

Once the 2017 EITI Report was published, the MSG engaged in several promotion activities of its content and public availability. For example, there was a one-page editorial in the main newspapers of Suriname, highlighting the main findings of the report.<sup>102</sup> The government organized a press conference for the launch of each of the EITI Reports, in which all the MSG members were involved. These events also included the participation of the Minister of Natural Resource.<sup>103</sup> The MSG organized an EITI outreach event linking transparency efforts to the launch of the new GMD website designed to manage the mining license allocation process.<sup>104</sup> Nonetheless, and given that the aforementioned events were not part of a systematic communication strategy, but rather more of an isolated outreach effort, the reports have had very limited contribution to public debate and almost none follow up after their launching.

The MSG also produced paper copies of the EITI Reports, but there is no evidence of these been widely distributed beyond the launching events. There is an online version of each of the reports which has been published in the EITI-SR web portal.<sup>105</sup> Besides the downloadable reports, the MONR has shared a wide variety of EITI related information in their own website.<sup>106</sup> Quite to the contrary, companies and CSOs have not engaged much in the communications efforts beyond the launching, and have not done any resharing of the Reports in their own websites, neither contributed to their distribution with the exception of Staatsolie which has shared in its portal a public statement of support to EITI<sup>107</sup>.

<sup>102</sup> <https://www.starnieuws.com/index.php/welcome/index/nieuwsitem/56695> (last accessed on 4 December 2020)

<sup>103</sup> Further media coverage of launching of the EITI 2017 Report in January 2020: <https://www.youtube.com/watch?v=6nf0zMHxufQ>; <https://www.apintie.sr/v23600>; <https://drimble.nl/dossiers/multicultureel/suriname/65804259/eiti-suriname-rapport-2017-gepresenteerd-en-overhandigd-stvs-journaal-23-jan-2020-video.htm>; [https://www.youtube.com/watch?v=tsqLj2EkSmA&ab\\_channel=ATV-NetworksSuriname](https://www.youtube.com/watch?v=tsqLj2EkSmA&ab_channel=ATV-NetworksSuriname); <http://www.dwtonline.com/492594?isMobileShowDesktop=yes>; and <https://www.surinametimes.com/ministerie-van-nh-publiceert-eiti-rapport-2017/> (last accessed on 4 December 2020)

<sup>104</sup> See videos from events available on the EITI-SR Facebook account: <https://www.facebook.com/minnhsuriname/videos/888702298210287/>; and <https://www.facebook.com/minnhsuriname/photos/pcb.2151421374959571/2151419321626443/?type=3&theater>

<sup>105</sup> 2017 EITI Report: [https://eitipuriname.org/wp-content/uploads/2019/12/EITI\\_SR\\_Report\\_2017.pdf](https://eitipuriname.org/wp-content/uploads/2019/12/EITI_SR_Report_2017.pdf) (last accessed on 4 December 2020)

<sup>106</sup> Ministry of Natural Resources website: <http://naturalresources.gov.sr/zoekresultaten/?search=eiti>

<sup>107</sup> <https://www.staatsolie.com/en/about-us/> (last accessed on 14 December 2020)

Neither the MSG nor the EITI-SR have prepared any open data policy which can be publicly consulted, and which refers to the information they publish, either in their website or through their reports. Despite this, both EITI Reports (covering 2016 and 2017 respectively) have been published under an open license and can be accessed directly from the EITI-SR web portal with a pdf format, but also through an interactive way<sup>108</sup>. Even though this format does not allow for downloading the information in an open data format, it should be noted that the documents can still be easily downloaded by the public and that the website offers ease of navigation to certain sections of each report, such as the one on “Reconciliation principles and explanation of reconciliation differences” or the one referring to the “Scope and Type of Payment Transaction”.

The online availability of the reports has been widely publicized by the MSG and the government. Nonetheless, not the reports themselves neither the web portal, contain any sort of notice for the data users informing them about the possibility of reusing the EITI information published through the reports without a need for prior consent.

The NS, with the approval of the MSG, hired Omedia to provide support on communication. However, the engagement with the company was limited to a few specific activities and did not produce a wider communications policy for disseminating the reports and findings. In this sense, Omedia was responsible for assisting in the set-up of the EITI-SR website, gathering the press contacts for the launching events of the EITI Reports, and creating a Facebook and Twitter account for EITI-SR. Both social media accounts have been active since November 2019, but with very limited engagement from the public. Currently the company is working on upgrading the EITI-SR website on the technical side, the NS is responsible for updating the portal content-wise.

Besides the publication of the reports, and to promote the EITI process in Suriname more widely, the MSG has also prepared and published a brief two-pager fact sheet on EITI implementation in Suriname which is also available online.<sup>109</sup> There is some evidence of outreach events such as press conferences for the launching of each of the reports, and brief media coverage referring to the start of validation (for the originally scheduled date).<sup>110</sup> Besides these limited efforts, there are no other actions or events for awareness raising or facilitation of dialogue regarding the EITI process in Suriname.

## Stakeholder views

Stakeholders seemed to be satisfied with the ways of releasing the reports through the EITI-SR portal. Companies and CSOs, as well as some government agencies, have confirmed that they have not shared further the report online in their own websites, but have simply used the link for downloading it from the EITI-SR portal. The MONR did mention sharing some of the data on their own portal.

Some government stakeholders noted the usefulness of having more detailed data on the extractive sector thanks to EITI. They explained this information has been translated into helpful input for planning and programs of certain government agencies (though no documentation was provided backing this). Along these lines, some have highlighted the usefulness of EITI data for implementing free and prior informed consent, which is an activity high on the MONR agenda.

<sup>108</sup> 2016 EITI data in the portal: <https://eitipuriname.org/en/eiti-suriname-reports/eiti-suriname-report-2016/reconciliation-principles/>; 2017 EITI data in the portal: <https://eitipuriname.org/en/eiti-suriname-reports/eiti-suriname-report-2017/scope-and-type-of-payment-transactions/>

<sup>109</sup> S-EITI fact sheet: <https://eitipuriname.org/wp-content/uploads/2019/04/seiti-factsheet-nl.pdf> (last accessed on 4 December 2020)

<sup>110</sup> Media coverage on the beginning of validation: <https://www.gfcnieuws.com/suriname-bereidt-zich-voor-op-eiti-validatie/> ; <https://www.surinametimes.com/ministerie-van-nh-publiceert-eiti-rapport-2017/> (last accessed on 4 December 2020)

On the other hand, some consulted stakeholders indicated that in their view, the data disclosed through EITI has not been very relevant from a political perspective. They also noted that the reports were published long after the facts, and that their availability was not widely disseminated. The lack of fresh data discouraged people of making us of it, according to a stakeholder.

In terms of language and clarity of the reports, during consultation several stakeholders highlighted that the EITI jargon is very technical and not simple to communicate. They emphasized that the format of the reports, being more than a hundred pages long, and covering technical and financial information, is not ideal to inform public debate. They suggested that to improve this, it would be necessary to break down the data through more accessible materials. The difficulties with communications were also raised with regards to the geographic challenges (for those not in the capital, it is harder to take part in the process due to lack of connectivity and difficulties for traveling). They also noted the, need for better communication materials and broader dissemination through channels such as Citizen's Information Centres (part of the Commissariat in each district). Stakeholders also referred to the need for improving communication efforts towards the people in the hinterland. Non-MSG CSOs emphasized on this aspect, explaining that the EITI Reports need to be presented in simpler language so that people can really understand them, and ideally also translated to local languages when possible. Many agreed that disseminating the information in digestible way, will incentivize more people to get involved with the EITI process and will facilitate local coverage.

During consultations there was a recurring topic about the lack of sufficient awareness on the EITI in Suriname. Many emphasized that it would be necessary to promote it further, and create other spaces for dialogue and debate, such as events at universities, the local communities, etc. They also mentioned that the website is rarely consulted, and this seems to be a wasted resource. In line with this, some stakeholders highlighted that the outreach to media has been quite limited and could be improved by making it more of a constant engagement instead of limiting it to report launching events.

## Initial assessment

The International Secretariat's initial assessment is that Suriname has made meaningful progress in meeting this requirement. The 2016 and 2017 EITI Reports are comprehensible and publicly accessible. Both reports have been promoted and disseminated to the public during launching events, and through the EITI-SR website, though further dissemination efforts could have been conducted to stimulate the debate on extractives governance in Suriname. Companies and CSOs have not engaged much in the communications efforts beyond the launching the Report, except for Staatsolie which has included a public EITI support statement in its website. The MSG did not agree an open data policy. There has been very limited evidence of government, companies or CSOs using the data from the EITI Reports, although they could represent a valuable resource for debates such as the one free and prior informed consent.

In accordance with Requirement 7.1, Suriname should ensure that EITI reports are comprehensible, actively promoted, publicly accessible and contribute to public debate. Suriname should ensure timely communication of EITI data and findings, as well as effective outreach to key stakeholders. Outreach events should be undertaken to spread awareness of and facilitate dialogue about EITI disclosures across the country. EITI-SR should adopt an open data policy and ensure that EITI data is available in open format. To strengthen implementation, the MSG may wish to consider linking a clear EITI-SR communications strategy more closely to the work plan and tailoring key messages to sector priorities rather than to EITI implementation more broadly. Suriname is encouraged to explore creative ways to strengthen the EITI's contribution to public debate and engage with the communities in the hinterland

where extractive activities take place. It is recommended that Suriname updates the EITI-SR website more regularly, as well as its social media accounts.

## Data Accessibility (#7.2)

### Documentation of progress

There is no evidence of the existence of English summary reports related to neither the first nor the second EITI reports. Even though the summary for the EITI Report 2016 has not been made public in English and only in Dutch, the English version of the EITI-SR website contains certain key information on the side tabs, that can be consulted directly for certain categories without having to navigate through the whole Report. The EITI Report 2017 does not have summary available in neither of the languages.

The MSG produced a SDT for fiscal year 2017, which was submitted on 30 April 2020 and finalized on 30 July 2020, after addressing some comments from the International Secretariat. Currently, this data has been published and can be accessed through the IS web portal.

There is limited evidence of automated online disclosures of data. Some of the mining groups operating in Suriname publish tax payments per country on their websites including Suriname, while the MOF publishes revenues derived from the extractive sector on its website, as well as the Statistics Office which offers details related to the exports.<sup>111</sup>

There is no evidence of capacity-building efforts directed at CSOs or other organisations more broadly. The MSG members explained having EITI implementation included within a wider CSOs monitoring reports, though the link is not fully clear.

### Stakeholder views

Stakeholders consulted expressed limited views on the matter of data accessibility. Most of the MSG members did not have comments SDTs submitted, and the NS mentioned that revising the IS's comments took them longer than expected. Some stakeholders did highlight the need for guaranteeing summary reports which make the data more accessible and easier to digest for a broader audience. They highlighted that, even though the EITI website is a good starting point for accessing the data, the lengthy reports containing very technical information without summaries make it hard engaging with the wider spectrum of the society. Stakeholders agree that there is still a considerable progress to be done before systematically disclose the EITI data in government systems in Suriname. This is related mostly with technological barriers and challenges in terms of data collection. Although comprehensive data is available online through the EITI Reports, stakeholders did not appear to be using it to conduct any further research or analysis. There appeared to be lack of capacity to engage and analyse the financial data disclosed. Some CSOs indicated having used the report as a tool to provide better understanding of the extractive sector and inform their wider discussions, and some companies explained that they simply share the reports on their websites, while other do not engage with the data at all. On the side of government, the Statistics Office mentioned that sometimes they have used the reports to complement to their own disclosures, given

<sup>111</sup> See for example: Ministry of Finance, "Government Finance Statistics and Budget 2017": <http://finance.gov.sr/media/1060/sme-gfs-tbls-publication-en-2017-191004-revised.pdf> and General Bureau of Statistics, "2017 Exports": <https://www.statistics-suriname.org/wp-content/uploads/2019/02/Belangrijkste-export-en-import-landen-2017-en-3de-kw-2018-en-handelbalans-Web-site-1.xls> (last accessed 11 December 2020).

that there is not much publicly available information on the extractives sector in Suriname, besides what that from EITI-SR.

## Initial assessment

This requirement is encouraged and is not considered when assessing progress in meeting the EITI Standard. It is commendable that Suriname has undertaken activities to ensure the publication of their SDT under the new format agreed by the EITI Board.

To strengthen implementation of Requirement 7.2, Suriname is encouraged to focus on capacity building efforts to develop stakeholders' capabilities for engaging and analysing EITI data. Suriname is encouraged to improve the accessibility of extractive industry data disclosed through government and company systems, as a means of transitioning towards systematic disclosures of EITI data.

## Lessons Learned and follow-up on recommendations (#7.3)

### Documentation of progress

The 2017 EITI Report provides a brief overview of the steps taken by the MSG to address the IA recommendations derived from the 2016 EITI Report<sup>112</sup>, mentioning there have been some improvements related to institutional and organisations matters, which were addressed before the publication of the 2017 EITI Report, and some of them also continued to be implemented through early 2020. For example, there have been some improvements in relation to procedures and transparency of the mining license award mechanisms as recommended by the IA. These include establishing an online registration system for applications for and processing of mining rights. Other recommendations resulting from EITI reporting, such as those related to the implementation of the BO roadmap have also been considered by the MSG, though not much progress has been achieved so far apart from the BO Documentation Assessment that was commissioned by the MONR. There is no evidence of a mechanism for the MSG to systematically discuss or follow up on recommendations from EITI reporting. In practice, it does not appear that the MSG has systematically considered the recommendations resulting from the 2016 EITI Report or the 2017 EITI Report, nor discussed them during MSG meetings. The 2019-2020 work plan includes only one activity for discussing on the recommendations of the previous report with a budget allocated, but no other follow-up mechanisms for implementing any decision derived from this discussion.<sup>113</sup> There is no evidence that the MSG followed up on the sources of discrepancies in reconciliation of payments and revenues.

The 2017 EITI Report shows that there are still several areas related to EITI disclosures that need to be addressed and improved<sup>114</sup> such as the level of SOEs' financial disclosures, the supervision of PSCs, and the improvement of the reconciliation process. Amongst the listing of the new recommendations, the IA notes that it is still necessary to enhance the transparency of gold exports, clarifying the mechanisms for granting the permits to exporters, and making it feasible to get a better understanding of their operations. There is no evidence that the MSG has took steps to investigate and address the causes of discrepancies, although these are no material.

<sup>112</sup> 2017 EITI Report. Pp.76-85.

<sup>113</sup> See: 2019-2020 S-EITI Report: 'Objective 5 – prepare, complete and submit the 2<sup>nd</sup> EITI-SR Report covering 2017': [https://eitipuriname.org/wp-content/uploads/2020/01/MSG\\_Workplan\\_2019\\_2020.pdf](https://eitipuriname.org/wp-content/uploads/2020/01/MSG_Workplan_2019_2020.pdf) (last accessed 07 December 2020).

<sup>114</sup> 2017 EITI Report. P.75.



## Stakeholder views

Stakeholders highlighted the difficulties they had for following up on concrete recommendations given the short period of time there was between the publication of the 2016 and the 2017 EITI Reports. They also mentioned that early in 2020 they had plan for having special MSG sessions to discuss the outcomes of the reports and the subsequent recommendations, but there has been no documentation backing this. Even though there was some references to how the MSG should contribute in addressing the recommendations within the discussion of the 2019-2020 work plan, this discussion was not translated into any concrete plan, series of next steps or any other action.<sup>115</sup> So far, the MSG members have been able to analyse only a few of the red flags raised by the IA, such as the delay in the implementation of the BO roadmap and the need to involve gold exporters in the EITI process. Nonetheless, the MSG has not managed to develop any concrete follow-up mechanisms for addressing these issues through EITI implementation.

The BO roadmap was also mentioned by some high-level government officials during consultations as a relevant point of action. The MSG, together with the support of a consultant, analysed the legislation, identified the needs for amendments in the regulation and have recently published a brief report for next steps on this matter. No further action has been taken so far on the next steps, but some stakeholders highlighted that the topic ranks high amongst the MSG priorities.

## Initial assessment

The International Secretariat's initial assessment is that Suriname has made meaningful progress in meeting this requirement. There is some evidence pointing to actions taken by the MSG to act upon lessons learned and implement reforms, such as the online application for mining rights, and to further investigate the barriers for implementation of Beneficial Ownership disclosures. Nonetheless, there does not appear to be a system in place to discuss, prioritise and adequately process recommendations from EITI reports to enhance EITI implementation, nor is there any indication that working groups have been set up to address specific recommendations.

In accordance with Requirement 7.3, Suriname is required to take steps to act upon lessons learnt with a view to strengthen the impact of EITI implementation on natural resource governance. In particular, Suriname should consider improving its procedures to analyse and follow-up on the recommendations resulting from EITI reporting making use of tools established in its own ToRs such as the subcommittees.

## Outcomes and impact of implementation (#7.4)

### Documentation of progress

The MSG has produced two Annual Progress Reports (APR), covering fiscal years 2017 and 2018 and published in September 2018 and in April 2020 respectively. Due to the extension of the period for data collection granted by the EITI Board for Suriname's Validation, the assessment of Requirement 7.4 will be based on the later document published within time frame, the 2018 APR.<sup>116</sup>

<sup>115</sup> See for example EITI-SR MSG Meeting Minute 12-2019: 28 June 2019

<sup>116</sup> See EITI Board, Decision 2020-32/BC-290:

[https://eiti.org/files/documents/madagascar\\_2017\\_validation\\_initial\\_assessment\\_final\\_clean.pdf](https://eiti.org/files/documents/madagascar_2017_validation_initial_assessment_final_clean.pdf)



The 2018 APR provides a detailed list of activities carried out during the year, noting the level of completeness reached in each of them. In section 3 and 5 it presents an assessment of performance against EITI requirements, referencing to specific strengths or weaknesses identified in the implementation process. However, and despite being published after the release of the 2016 EITI Report (in April 2019), the 2018 APR does not offer any analysis of the progress made regarding the recommendations derived from the first report.

In terms of follow-up on the EITI work plan's execution, the 2018 APR was drafted taking into consideration the previous objectives from the 2017-2018 work plan, so it also lacks an updated overview of developments in EITI implementation. In other words, as that the objectives of the first work plan were focused on completing the required steps for EITI candidature and delivering the first EITI Report, the assessment of progress provided in the 2018 APR seems obsolete, given that it does not reflect on the implementation of updated objectives set forth in the new 2019-2020 work plan.

The 2018 APR does not provide much information related to progress related to compliance with Requirements, limiting its comments to BO disclosures. It simply mentions that the BO roadmap was completed in October 2017 but offers no further details on how this was achieved, neither on which steps were taken since then. In addition to this, it also clarifies that BO disclosures had been requested from reporting companies on a voluntary basis for the 2016 EITI Report.

There is no indication that all stakeholders, whether MSG members or members of the broader constituencies, have been able to participate in the production of the APRs and provide their input to these documents. Nonetheless this does not appear to be due to barriers in stakeholders' participation, but mostly related to a lack of capacity in devoting time for reviewing impact. Consequently, neither the 2018 APR nor other documents prepared by EITI-SR present a narrative on how the implementation of EITI in Suriname could be strengthened and be made more impactful.

## Stakeholder views

During consultations the stakeholders confirmed that they have done limited work on reviewing the impact and outcomes of EITI implementation in Suriname. They explained that, due to capacity constraints, they have chosen to focus the core of their work on publishing the EITI Reports and have barely devoted any time on considering the broader impact of implementation.<sup>117</sup> These capacity constraints were coupled with a lack of funding for a properly-staffed NS that could support the MSG's work, which has made it harder for the MSG to work on the different aspects of the EITI process. The lack of funding falls in line with the weakness identified in the APR of 2018, regarding the delays in the approval and operationalization of the EGPS grant.

Some stakeholders have also referred to the implementation of the BO roadmap as an issue very relevant for the MSG agenda. They said they are aware that there is lot of further work needed for implementing BO transparency, and that is why they have hired the consultant for producing the legal analysis on this matter - recently shared with the IS in early December 2020 but not published to date.

<sup>117</sup> Lack of transparency in the Surinamese licensing procedures, for example, has been recently signalled by the US State Department as an area in need of improvement; nonetheless the MSG has not addressed this topic in the framework of reviewing the impact of EITI implementation. See: US State Department, "2020 Investment Climate Statements: Suriname": <https://www.state.gov/reports/2020-investment-climate-statements/suriname/> (last accessed: 11 December 2020).

## Initial assessment

The International Secretariat's initial assessment is that Suriname has made inadequate progress in meeting this requirement. The 2018 annual progress report poorly documents progress in implementing the 2017-2018 work plan, which was not the most recent work plan at the commencement of Validation. The work plan is limited to documenting progress on Requirement 2.5. There is no indication that all stakeholders, whether MSG members or members of the broader constituencies, have been able to participate in the production of the 2018 annual progress report. However, it appears that the MSG has not reviewed the impact and outcomes of EITI implementation. The 2018 APR does not provide a narrative account of efforts to strengthen the impact of EITI implementation on natural resource governance.

In accordance with Requirement 7.4, Suriname is required to review the outcomes and impact of EITI implementation on natural resource governance. Suriname should ensure that all stakeholders are able to participate in the production of the annual progress report and review the impact of EITI implementation. Stakeholders beyond the MSG should be able to provide feedback on the EITI process and have their views reflected in the annual progress report. The MSG should ensure that an assessment of progress with achieving the objectives set out in its work plan is carried out, including the impact and outcomes of the stated objectives. The MSG may wish to also ensure that the APR, the MSG's action plan and any other management tools are used to feed into the annual work plans.

TABLE 7 - SUMMARY INITIAL ASSESSMENT TABLE: OUTCOMES AND IMPACT

EITI provisions	Summary of main findings	International Secretariat's initial assessment of progress with the EITI provisions
Public debate (#7.1)	Suriname's Reports are comprehensible, publicly accessible, and have been promoted and disseminated to the public during launching events, and through the EITI-SR website, though further dissemination efforts could have been conducted to stimulate the debate on extractives governance in Suriname. Companies and CSOs have not fully engaged in the communications efforts beyond attending the launching of the Reports except for Staatsolie which includes in its main page a public EITI support statement. There has been very limited evidence of government, companies or CSOs using the data from the EITI Reports. The MSG did not agree an open data policy.	Meaningful progress
Data accessibility (#7.2)	Requirement 7.2 encourages the MSGs to make EITI reports accessible to public in open data formats. Such efforts are encouraged but not required and are not assessed in determining compliance with the EITI Standard. Suriname has made efforts to improve data accessibility, and there is potential for further mainstreaming disclosures through government systems.	
Lessons learned and follow up on recommendations (7.3)	There is some evidence pointing to actions taken by the MSG to act upon lessons learned and implement reforms, such as the online application for mining rights, and to further investigate the barriers for implementation of BO disclosures. Nonetheless, there does not appear to be a system in place to discuss, prioritise and adequately process recommendations from EITI reports	Meaningful progress

	to enhance EITI implementation, nor is there any indication that working groups have been set up to address specific recommendations.	
Outcomes and impact of implementation (#7.4)	The 2018 APR poorly documents progress in implementing the 2017-2018 work plan which is not the most recent work plan. The work plan is limited to document progress on Requirement 2.5. All constituencies had a chance to contribute to the APR. However, it appears that the MSG has not reviewed the impact and outcomes of EITI implementation. The 2018 APR does not provide a narrative account of efforts to strength the impact of EITI implementation on natural resource governance.	Inadequate progress

**Secretariat's recommendations:**

1. In accordance with Requirement 7.1, Suriname should ensure that EITI reports are comprehensible, actively promoted, publicly accessible and contribute to public debate. Suriname should ensure timely communication of EITI data and findings, as well as effective outreach to key stakeholders. Outreach events should be undertaken to spread awareness of and facilitate dialogue about EITI disclosures across the country. EITI-SR should adopt an open data policy and ensure that EITI data is available in open format. To strengthen implementation, the MSG may wish to consider linking a clear EITI-SR communications strategy more closely to the work plan and tailoring key messages to sector priorities rather than to EITI implementation more broadly. Suriname is encouraged to explore creative ways to strengthen the EITI's contribution to public debate and engage with the communities in the hinterland where extractive activities take place. It is recommended that Suriname updates the EITI-SR website more regularly, as well as its social media accounts.
2. To strengthen implementation of Requirement 7.2, Suriname is encouraged to focus on capacity building efforts to develop stakeholders' capabilities for engaging and analysing EITI data. Suriname is encouraged to improve the accessibility of extractive industry data disclosed through government and company systems, as a means of transitioning towards systematic disclosures of EITI data.
3. In accordance with Requirement 7.3, Suriname is required to take steps to act upon lessons learnt with a view to strengthen the impact of EITI implementation on natural resource governance. In particular, Suriname should consider improving its procedures to analyse and follow-up on the recommendations resulting from EITI reporting making use of tools established in its own ToRs such as the subcommittees.
4. In accordance with Requirement 7.4, Suriname is required to review the outcomes and impact of EITI implementation on natural resource governance. Suriname should ensure that all stakeholders are able to participate in the production of the annual progress report and review the impact of EITI implementation. Stakeholders beyond the MSG should be able to provide feedback on the EITI process and have their views reflected in the annual progress report. The MSG should ensure that an assessment of progress with achieving the objectives set out in its work plan is carried out, including the impact and outcomes of the stated objectives. The MSG may wish to also ensure that the APR, the MSG's action plan and any other management tools are used to feed into the annual work plans.

## Annexes

### Annex A - List of MSG members

Government agency	Name
Ministry of Natural Resources	Member: Mr Dave Abeleven
Ministry of Natural Resources	Alt: Mrs V Refos Lalji
Ministry of Finance	Member: Mrs Joy ten Berge
Ministry of Finance	Alt: Mrs Sagita Jaggan
Ministry of Regional Development	Member: Mr Henk Deel
Ministry of Trade and Industry	Alt: Mr Quincy Wielson
CSO	Name
Stichting Projekta	Member: Mrs Rayah Bhattacharji
Stichting Projekta	Alt: Mrs Monique Essed-Fernandes
VIDS, VSG & 12 Lo's der Aukaner	Member: Rene Artist
VIDS, VSG & 12 Lo's der Aukaner	Alt: Mr Ewald Poetrissi
Other Civil: Staatsolie Werknemers Organisatie Suriname (SWOS) en Rosebel Gold Mines werknemers organisatie (RGWO)	Member: Mr Roy Caupain
Other Civil: Canvas	Alt: Tosca Pinas
Company	Name
SHMR- Canasur Gold Limited (Subsidiary companies of Caribbean Minerals Company N.V (Cariminco) and Cansur Goldmines N.V)	Member: Mr Tedy Jbara
SHMR- Nana Resources N.V	Alt: Mr Michael R Naarendorp
Oil and Gas: Staatsolie Maatschappij Suriname N.V	Member: Mrs Daniella Herkul
Oil and Gas: Tullow Oil	Alt: Mr Richard Donallan
Mining Mineral Agreement: Iam Gold Rosebel Gold Mines N.V	Member: Mr Albert R Ramdin
Mining Mineral Agreement: Newmont Suriname	Alt: Mr Michael Raafenberg

Annex B – MSG meeting attendance<sup>118</sup>

2017		Date																										Attendance						
Name	Affiliation	17/02	10/03	24/03	07/04	28/04	5/05	11/05	17/05	18/05	19/05	26/05	02/06	16/06	3/07	4/07	5/07	6/07	14/07	28/07	4/08	24/08	29/08	6/10	13/10	20/10	27/10	1/11	3/11	10/11	24/11	8/12	Total (31)	%
Dave Abeleven	MONR	x	x	x	x	x	x		x	x	x			x	x		x	x		x	x	x	x	x			x	x	x	x	x		25	80
Alt. Valerie Lalji	MONR.																				x	x	x	x				x		x	x	x	8	26
Aroen Jadoenathmsier	Gov				x									x								x			x								4	13
Henk Deel	MORD		x	x	x	x	x	x	x		x	x	x	x			x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	25	80
Joy ten Berge	MOF	x	x	x								x	x		x	x				x	x	x	x	x				x	x	x		15	48	
Joan Veldhuizen	Gov				x			x	x	x						x		x										x				7	23	
Rayah Bhattacharji	Stitching Project	x	x		x	x	x	x	x	x	x	x	x				x	x	x		x	x	x	x	x		x				x	x	22	71
Alt. Monique Essed-Fernandes	Stitching Project	x	x			x		x	x	x			x	x							x								x	x			12	39
Rene Artist	VIDS	x		x		x	x	x	x	x	x	x	x	x	x			x		x	x	x	x		x		x		x	x		x	22	71
Dimitri Tjon Sie	CS	x	x	x	x	x	x	x	x	x		x		x	x	x	x	x	x	x	x	x											18	58
Erna Aviankoi	CS						x	x	x															x								4	13	
Roy Caupain	SWOS		x	x	x	x	x	x	x		x						x						x	x		x	x		x	x	x	x	19	61
Lisa Best	SWOS																													x		x	2	6
Tom Fauria	Comp.		x	x		x	x	x	x	x				x	x		x	x			x	x	x		x				x	x			18	58
Vandana Gangaram Panday	Comp.		x	x	x	x	x		x	x	x		x	x	x	x		x						x									15	48

<sup>118</sup> Please note that the attendance for 2017, 2018 and 2019 has been provided by EITI-SR, while the attendance for 2020 was calculated by the International Secretariat based on the 2020 meetings' minutes provided by EITI-SR.





Tom Fauria	Comp.		x	x		x						x	x	x		x	x	8	38
Vandana Gangaram Panday	Comp.	x		x						x		x				x		5	31
Alt. Albert Ramdin	Mining Mineral Agreement	x															x	2	12
Sharmila Jadnanansing	Comp.		x	x			x	x	x	x	x	x					x	9	56
Tedy Jbara	SHMR	x	x		x	x	x	x	x	x	x	x	x	x	x	x	x	15	94
Alt. Michael Naarendorp	SHMR	x	x	x	x		x			x				x		x	x	9	56

2019		Date																				Attendance	
Name	Affiliation	11/01	25/01	11/02	22/02	15/03	25/03	9/04	23/04	7/05	17/05	24/05	31/05	14/06	28/06	19/07	30/08	25/10	8/11	29/11	20/12	Total (20)	%
Dave Abeleven	MONR	X	X	X		X	X	X		X	X	X		X	X	X	X	X	X		X	17	85
Alt. Valerie Lalji	MONR						X					X								X		3	15
Henk Deel	MORD	X	X		X	X	X	X	X	X	X		X	X	X	X	X	X	X	X	X	17	85
Alt. Quincy Wielson	MOTI																	X				1	5
Aroen Jadoenathmisier	MOTI	X										X										2	10
Joy ten Berge	MOF	X		X		X				X	X	X			X				X	X	X	10	50
Alt. Sagita Jaggan	MOF								X	X	X			X	X			X				6	30
Rayah Bhattacharji	Stitching Project		X	X		X			X		X	X	X	X	X	X	X	X	X	X	X	15	75
Alt. Monique Essed-Fernandes	Stitching Project	X	X	X		X	X	X	X				X		X	X					X	11	55
Rene Artist	VIDS	X		X		X					X	X	X	X		X		X	X	X		11	55
Alt. Ewald Poetrissi	VIDS																X					1	5
Roy Caupain	SWOS	X				X				X	X			X		X		X	X	X	X	10	50
Alt. Lisa Best	SWOS					X					X		X	X			X					5	25
Tom Fauria	Kosmos		X	X		X	X	X			X	X		X	X							9	45
Vandana Gangaram Panday	Staatsolie	X		X																		2	10
Michiel Raafenberg	MMA	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X				X	16	80

Alt. Albert Ramdin	MMA																X		X					2	10	
<b>Sharmila Jadnanansing</b>	RGM	X			X						X														3	15
<b>Tedy Jbara</b>	SHMR	X		X	X	X	X	X	X		X	X		X	X	X	X	X	X	X	X	X	X		17	85
Alt. Michael Naarendorp	SHMR	X	X	X		X		X		X	X								X						8	40
<b>Daniella Herkul</b>	Staatsolie				X		X		X	X	X	X			X	X		X		X	X				10	50
Alt. Richard Donallan	Tullow																	X		X					2	10

2020		Dates				Attendance	
Name	Affiliation	24/01	20/05	03/06	24/06	Total (4)	%
<b>Dave Abeleven</b>	<b>MONR</b>	X	X	X	X	4	100
Alt. Valerie Lalji	MONR	X				1	25
<b>Joy ten Berge</b>	<b>MOF</b>			X		1	25
Alt. Sagita Jaggan	MOF	X	X	X	X	4	100
<b>Henk Deel</b>	<b>MORD</b>	X				1	25
Alt. Quincy Wielson	MOTI	X			X	1	25
<b>Rayah Bhattacharji</b>	<b>Stitching Project</b>	X	X	X	X	4	100
Alt. Monique Essed-Fernandes	Stitching Project	X	X	X	X	4	100
<b>Rene Artist</b>	<b>VIDS</b>	X	X		X	3	75
Alt. Ewald Poetrise	VIDS					0	0
<b>Roy Caupain</b>	<b>SWOS/RGWO</b>	X	X			2	50
Alt. Tosca Pinas	Canvas		X		X	2	50
<b>Tedy Jbara</b>	<b>SHMR -Canasur Gold Limited</b>	X	X		X	3	75
Alt. Michael Naarendorp	Nana Resources N.V.					0	0
<b>Daniella Herkul</b>	<b>Staatsolie</b>			X	X	2	50
Alt. Richard Donallan	Tullow					0	0
<b>Michiel Raafenberg</b>	<b>RGM</b>	X	X	X	X	4	100
Alt. Albert Ramdin	Newmont					0	0

## Annex C – Cost of EITI Reports

Report	Link	Date of publication	IA	Cost (USD)
2016 EITI Report	<a href="https://eitipuriname.org/wp-content/uploads/2019/04/Suriname_EITI_report_2016.pdf">https://eitipuriname.org/wp-content/uploads/2019/04/Suriname_EITI_report_2016.pdf</a>	May 2019	BDO	Approx. 100,000
2017 EITI Report	<a href="https://eitipuriname.org/wp-content/uploads/2019/12/EITI_SR_Report_2017.pdf">https://eitipuriname.org/wp-content/uploads/2019/12/EITI_SR_Report_2017.pdf</a>	December 2019	BDO	Approx. 70,000

Source: EITI-SR Secretariat, sent on 09 December 2020

## Annex D - List of stakeholders consulted

### Government

- David Abiamofo, Minister, MONR
- Clyde Griffith, current National Coordinator MONR
- Dave Abeleven, former National Coordinator, Permanent Secretary, MONR
- Deel Henk, Advisor, MORD
- Preciosa Simmons, Director of Mining, MONR
- Sagita Jaggan, Senior Sector Coordinator, MOF
- Georgetine Tjalim, Deputy Head of Finance Department, MOF
- Guillian Koornaar, Manager of Economic Statistics, General Bureau of Statistics
- Denise Sjahkit, Head of National Account, General Bureau of Statistics
- Marjorie Sandjon Kasanradji, Deputy Head of National account, General Bureau of Statistics
- Quincy Wielson, Advisor, Ministry of Economic Affairs [former MOTI]
- Stareau Romalho, Junior Economist, Central Bank
- Boejhawan Shared, External Section Data Head, Central Bank
- Elaine Campagne, Tax Authority

### Parliament

- Gregory Rusland, MP National Party – former Minister of Natural Resources.

### Industry

- Richard Donellan, Suriname Country Manager, Tullow Oil
- Sharan Tjon Kwie Sem, Accounting Supervisor, Kosmos Energy
- Mike Resomardono, Head of country office Suriname, Kosmos Energy
- Daniela Herkul, Corporate legal affairs, Staatsolie
- Ruiz Soekha, Financial Planner, Staatsolie
- Marny Daal, Director Hydrocarbon Institute, Staatsolie
- Michiel Raafenberg, Senior Associate Corporate Affairs, Iam Gold Rosebel
- Tedy Jbara, SHMR- Canasur Gold Limited
- Michael Naarendorp, Nana Resources N.V.
- Charita Vermeer, Assitant Legal Affairs Manager, Newmont
- Gordon Mountfort, Vice Presidency General Manager, Newmont
- Marty Saerie, Senior Planning & Capital Analyst, Newmont
- Vanessa Dubois, Senior Financial Analyst, Newmont
- Daniel Hoogvliets, Finance Manager, Grassalco
- Wan Amrul 'As Bin Wan Ahmad, Head, Finance and Accounts, Petronas
- Kaliem Chan, Finance Executive, Petronas
- Angela Seetal Nanhkoesingh, Finance Executive, Petronas
- Anita Boedhai, Finance Executive, Petronas

### Civil Society

- Monique Essed, Projekta
- Rayah Bhattacharji, Projekta
- Tosca Pinas, Kampos
- Roy Caupin, Staatsolie Employee Organisation Suriname & Rosebel Gold Mines Employee Organisation



- Rene Artist, VIDS
- Marie Josee Artist, VIDS
- Renatta Simmons, Kampos (collaboration of Tribal Peoples in Suriname)
- Adit Moensi, Association of Economist in Suriname
- Minu Parahoe, Conservation Team Suriname
- Leon Brunings, ACIBI
- Desiree Simmons, Green Fund Suriname
- Maggie Schmeitz, Executive Director, Stichting ultimate purpose

#### **Independent administrator**

- Robin Ferrier, BDO
- Shashi Abhelakh, BDO

#### **Development partners**

- Susana Moreira, TTL, World Bank

#### **Others**

- Lou O'Brien, Director, Omedia Communications Company

## Annex E - List of reference documents / Bibliography

### Workplans and Annual activity reports:

- Annual Progress Report 2018: [https://eiti.org/files/documents/annual\\_progress\\_report\\_2018\\_final\\_eitistr.pdf](https://eiti.org/files/documents/annual_progress_report_2018_final_eitistr.pdf)
- Annual Progress Report 2017: [https://eiti.org/files/documents/annual\\_progress\\_report\\_sep\\_2018\\_suriname.pdf](https://eiti.org/files/documents/annual_progress_report_sep_2018_suriname.pdf)
- Work Plan 2019-2020: [https://eitipuriname.org/wp-content/uploads/2020/01/MSG\\_Workplan\\_2019\\_2020.pdf](https://eitipuriname.org/wp-content/uploads/2020/01/MSG_Workplan_2019_2020.pdf)
- Work Plan 2017-2018: <https://eiti.org/document/suriname-eiti-workplan>

### EITI Reports, Summaries, Validation Report and Secretariat Review:

- EITI Report 2017: [https://eitipuriname.org/wp-content/uploads/2019/12/EITI\\_SR\\_Report\\_2017.pdf](https://eitipuriname.org/wp-content/uploads/2019/12/EITI_SR_Report_2017.pdf)
- EITI Report 2016: [https://seiti.org/wp-content/uploads/2019/04/Suriname\\_EITI\\_report\\_2016.pdf](https://seiti.org/wp-content/uploads/2019/04/Suriname_EITI_report_2016.pdf)

### Legal documents and ToRs related to EITI implementation:

- MSG's Terms of Reference: [https://eitipuriname.org/wp-content/uploads/2019/04/official\\_SEITI\\_ToR\\_2016.pdf](https://eitipuriname.org/wp-content/uploads/2019/04/official_SEITI_ToR_2016.pdf)
- Suriname's Candidature file: <https://bit.ly/2TfrtRe>

### Other documents:

- EITI-SR, Fact sheet: <https://eitipuriname.org/wp-content/uploads/2019/04/seiti-factsheet-nl.pdf>
- EITI-SR, Request for Expressions of Interest for Consulting Services on Legal Assessment of the Institutional Framework for BO in Suriname and Advice on Next Steps, December 2019: [https://eitipuriname.org/wp-content/uploads/2020/04/200416\\_1600\\_RequestExpressionOfInterest\\_BeneficiaryOwnership\\_EITISR\\_Final.pdf](https://eitipuriname.org/wp-content/uploads/2020/04/200416_1600_RequestExpressionOfInterest_BeneficiaryOwnership_EITISR_Final.pdf)
- Letter from CSOs and Companies directed at Minister and Champion, D. Abiamofu, regarding funding issues for EITI implementation, dated Sept. 2020.<sup>119</sup>
- Staatsolie. PSC Model: <https://www.staatsolie.com/media/tuvjyme3/model-psc.pdf>
- Staatsolie. Annual Report 2017. [https://www.staatsolie.com/media/ribfx3sh/staatsolie\\_annual-report-2017\\_online\\_final.pdf](https://www.staatsolie.com/media/ribfx3sh/staatsolie_annual-report-2017_online_final.pdf)
- Statement from CSOs on EITI-SR MSG Chair position from July 2019.<sup>120</sup>
- Bissessur & Co. P.P.G. Bissessur LL.M. A legal assessment of the institutional framework for Beneficial Ownership (BO) in Suriname and advice on the first steps of BO implementation.

### Meeting minutes<sup>121</sup>

- EITI-SR MSG Meeting Minute 14-2078: 3 July 2017
- EITI-SR MSG Meeting Minute 15-2078: 4 July 2017
- EITI-SR MSG Meeting Minute 1-2018: 12 January 2018
- EITI-SR MSG Meeting Minute 2-2018: 26 January 2018
- EITI-SR MSG Meeting Minute 3-2018: 12 February 2018

<sup>119</sup> Please note that this document is not accessible online and has been provided directly by the CSOs representatives in November 2020.

<sup>120</sup> Please note that this document is not accessible online and has been provided directly by the CSOs representatives in November 2020.

<sup>121</sup> Please note that the MSG meeting minutes are not accessible online and had been provided by ITI-SR in September 2020 to the International Secretariat. These documents could be made available upon request.

- EITI-SR MSG Meeting Minute 4-2018: 19 March 2018
- EITI-SR MSG Meeting Minute 5-2018: 6 April 2018
- EITI-SR MSG Meeting Minute 1-2019: 11 January 2019
- EITI-SR MSG Meeting Minute 2-2019: 25 January 2019
- EITI-SR MSG Meeting Minute 12-2019: 28 June 2019
- EITI-SR MSG Meeting Minute 10-2019: 31 May 2019
- EITI-SR MSG Meeting Minute 11-2019: 28 June 2019

#### Other government documents/reports:

- Central Bank, Gross Domestic Product by Economic Activity at Current Prices (2006-2020): <https://www.cbvs.sr/images/content/statistieken/Database/Table21.pdf>
- De Nationale Assemblée – DNA (Parliament), “Wetgeving”: [http://dna.sr/media/247967/Ontwerpwetwet\\_Milieu\\_Raamwet.pdf](http://dna.sr/media/247967/Ontwerpwetwet_Milieu_Raamwet.pdf)
- General Bureau of Statistics, 2017 Exports: <https://www.statistics-suriname.org/wp-content/uploads/2019/02/Belangrijkste-export-en-import-landen-2017-en-3de-kw-2018-en-handelbalans-Web-site-1.xls>
- Geologisch Mijnbouwkundige Dienst (Geological Mining Service): <https://geologymining-sr.maps.arcgis.com>
- Law 19 of 1968 on the legal regulation of foundations - G.B. 1968 no. 74 (WET van 19 juli 1968, houdende wettelijke regeling van stichtingen): [https://eiti.org/files/documents/law\\_regulating\\_the\\_ngos\\_in\\_suriname\\_1.pdf](https://eiti.org/files/documents/law_regulating_the_ngos_in_suriname_1.pdf)
- Ministerie van Financiën (Ministry of Finance): <http://finance.gov.sr/>
- Ministerie van Financiën, Government Finance Statistics and Budget 2017: [http://finance.gov.sr/media/1060/sme-gfs-tbls-publication\\_en\\_2017\\_191004-revised.pdf](http://finance.gov.sr/media/1060/sme-gfs-tbls-publication_en_2017_191004-revised.pdf)
- Ministerie van Natuurlijke Hulpbronnen (Ministry of Natural Resources): <http://naturalresources.gov.sr/>
- Ministerie van Natuurlijke Hulpbronnen (Ministry of Natural Resources), Sharing of EITI-related data <http://naturalresources.gov.sr/zoekresultaten/?search=eiti>
- Staatsolie: <https://www.staatsolie.com>
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- Apintie, “Suriname publiceert nieuw EITI-rapport” (January 2020): <https://www.apintie.sr/v23600>
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- EITI-SR, Twitter: <https://twitter.com/EitiSuriname>
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- Terra Viva, “European Commission – Civil Society Development in Suriname”, November 2020 <https://terravivagrants.org/european-commission-civil-society-development-in-suriname/>
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- Workshops held with Trinidad & Tobago for preparing candidature (2016): <http://www.tteiti.org.tt/wp-content/uploads/Activity-Report-2016.pdf>

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- Citizens’ Initiative for Participation and Good Governance, “2e Monitoringsrapport” (2<sup>nd</sup> Monitoring Report), 2017-2019: <https://www.dbsuriname.com/wp-content/uploads/2020/05/Monitoringsrapport-Inleiding-Conclusies.pdf>
- Civicus, Monitor Tracking Civic Space, “Freedom of expression”: <https://monitor.civicus.org/country/suriname/>
- DCAF, “Suriname Country Profile”: <https://issat.dcaf.ch/Learn/Resource-Library2/Country-Profiles/Suriname-Country-Profile>
- Freedom House, “Freedom in the World 2020”: <https://freedomhouse.org/country/suriname/freedom-world/2020>
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## Annex F – Progress in addressing individual EITI Requirements

## Requirement 1: MSG oversight

Assessment table: MSG oversight					
Government oversight of the EITI process (#1.1)					
EITI sub-Requirement	Summary of main findings	Source(s) of information	Summary of stakeholder views	Recommendation on compliance with the EITI provisions	Proposed corrective actions and recommendations
The government has issued a public statement of its intention to implement the EITI (#1.1.a)	The Government of Suriname first committed to implement the EITI in February 2016 and in April 2016, former Minister of Natural Resource, Mr. Regilio Dodson, declared his unequivocal commitment to EITI implementation.	<p>Announcement of commitment to join the EITI in the 7<sup>th</sup> EITI Global Conference (February 2016) and in the Symposium 'EITI in Suriname: Moving towards implementation' (from April 2016) <a href="#">here</a>. (last accessed on 04 December 2020)</p> <p>Workshops held with Trinidad &amp; Tobago for preparing candidature (2016): <a href="#">here</a>. (Last accessed on 04 December 2020)</p>	See the main text.	Meaningful progress	See the main text.

		<p>Letter with submission of Suriname's candidature application: <a href="#">here</a>. (Last accessed on 04 December 2020)</p> <p>Media coverage of Suriname's candidature application: <a href="#">here</a>. (Last accessed on 04 December 2020)</p> <p>Suriname's Candidature Application file: <a href="#">here</a> (Last accessed on 04 December 2020)</p>			
The government has appointed a senior individual to lead on the implementation of the EITI (#1.1.b)	The former Minister of Natural Resources, Mr Regilio Dodson, was appointed as National Champion in April 2016. The former Minister of Natural Resources, Mr Sergio Akiemboto was National Champion from May 2019 until June 2020. Currently, Mr David Abiamfo, the newly appointed Minister of Natural Resources has taken over the role as new EITI Champion after the change of administration in May 2020.	<p>IS Meeting with Minister Abiamfo as EITI champion (July 2017): <a href="#">here</a></p> <p>(Last accessed on 04 December 2020)</p>	See the main text.		
The government is fully, actively and effectively engaged in the	The MSG's ToR reserve three seats for representatives of government institutions and agencies: MONR (with one alternate), MOF (with one alternate), and MORD (with a	<p>MSG's Terms of Reference: <a href="#">here</a>. (Last accessed on 04 December 2020)</p> <p>MSG Meeting attendance (Annex B)</p>	See the main text.		



<p>EITI process (#1.1.c)</p>	<p>respective alternate of MOTI). Meeting minutes show that government's attendance is not regular. According to the 2019-2020 work plan, the government is not providing financial funding for EITI implementation more than for covering operational costs of the MSG and the basic functioning of the Secretariat. The NS is housed in the MONR and it has had an average of three part time staff. Currently there is an expected modification of the NS position within the Ministry which would give enhanced staffing. There is very limited no evidence on government agencies or the parliament using data from EITI reports, all of it anecdotal.</p>	<p>Launch of the 1<sup>st</sup> and 2<sup>nd</sup> EITI Reports: <a href="#">here</a>, <a href="#">here</a>, <a href="#">here</a>, <a href="#">here</a>, <a href="#">here</a>, and <a href="#">here</a>. (Last accessed on 04 December 2020)</p> <p>2019-2020 work plan, <a href="#">here</a>. (Last accessed on 04 December 2020)</p> <p>Letter from, CSOs and Companies directed at Minister and Champion David Abiamofo, regarding funding issues for EITI implementation (dated Sept. 2020).</p>			
<p>Senior government officials are represented on the MSG (#1.1.d)</p>	<p>Government MSG members hold senior positions, but government participation in MSG meetings varies, with some having attended very few.</p>	<p>Suriname EITI MSG Composition, <a href="#">here</a>. (Last accessed on 04 December 2020)</p> <p>MSG Meeting attendance (Annex B)</p>	<p>See the main text</p>		

Industry engagement (Requirement 1.2)					
EITI sub-Requirement	Summary of main findings	Source(s) of information	Summary of stakeholder views	Recommendation on compliance with the EITI provisions	Proposed corrective actions and recommendations
Companies are fully, actively and effectively engaged in the EITI process (#1.2.a)	<p>Companies engagement has been focused on providing the data for the reports (all material companies have participated in the process). Industry does not seem to make use of EITI data and be engage in dissemination efforts.</p> <p>Attendance to MSG meetings has been irregular, but companies have actively participated in approving the ToRs for the IA, work plans, and revising the Reports.</p>	<p>MSG Meeting attendance (Annex B)</p> <p>2017 EITI report, <a href="#">here</a>. (Last accessed 05 December 2020).</p>	See the main text.	Meaningful progress	See the main text.
There is an enabling environment for company	There is no reason to conclude there is no enabling environment for company participation in the EITI.	-	Attendance to MSG meetings has been irregular.		

participation in the EITI (#1.2.b-c)					
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Civil society engagement (Requirement 1.3)					
EITI sub-Requirement	Summary of main findings	Source(s) of information	Summary of stakeholder views	Recommendation on compliance with the EITI provisions	Proposed corrective actions and recommendations
There is an enabling environment for freedom of expression and civil society is actively engaged in expression on EITI (#1.3.a,b,e.i and CSP 2.1)	It seems there is an enabling environment for freedom of expression and civil society is actively engaged in expressing their views on the EITI process.	Civicus Monitor Tracking Civic Space, "Freedom of expression": <a href="#">here</a> . (Last accessed on 05 December 2020)  US State Department, 2020 Investment Climate Statements: Suriname, <a href="#">here</a> . (Last accessed on 05 December 2020)	Stakeholders confirmed there are no issues related to freedom of expression in Suriname.	Satisfactory progress	See the main text.
There is an enabling environment for freedom of operation and civil society is freely and proactively	There is no reason to conclude there is not an enabling environment for freedom of operation and/or that civil society is not freely and proactively operating in relation to EITI.	DCAF, Suriname Country Profile: <a href="#">here</a> . (Last accessed on 5 December 2020)  Law 19 of 1968 on the legal regulation of foundations - G.B. 1968 no. 74 ( <i>WET van 19 juli</i>	Stakeholders also confirmed there is an enabling environment for CSOs in Suriname regarding their freedom of operation, the activities they carry out and their		

operating in relation to EITI (#1.3.a,b,e.ii and CSP 2.2)		1968, houdende wettelijke regeling van stichtingen): <a href="#">here</a> .	engagement in the EITI process.		
There is an enabling environment for freedom of association and civil society is freely and proactively associating in relation to EITI (#1.3.a,b,e.iii and CSP 2.3)	There is no reason to conclude there is not an enabling environment for freedom of association and/or that civil society is not freely and proactively associating in relation to EITI.	Freedom House, Freedom in the World: <a href="#">here</a> . (Last accessed on 5 December 2020)  Civicus Monitor Tracking Civic Space, "Freedom of expression": <a href="#">here</a> . (Last accessed on 5 December 2020)	All stakeholders consulted agreed on the freedom of associations for CSOs in Suriname.		
There is an enabling environment for freedom of engagement and civil society is freely and proactively engaging in relation to EITI (#1.3.a,b,e.iv and CSP 2.4)	There is no reason to conclude there is not an enabling environment for freedom of engagement and/or that civil society is not freely and proactively engaging in relation to EITI.	Letter from, CSOs and Companies directed at Minister and Champion, Mr David Abiamfofo, regarding funding issues for EITI implementation (dated Sept. 2020).	All stakeholders consulted agreed on the freedom of engagement for CSOs in the country.		

<p>There is an enabling environment for access to public decision-making and civil society is freely and proactively accessing public decision-making in relation to EITI (#1.3.a,b,e.v and CSP 2.5)</p>	<p>There is no reason to conclude there is not an enabling environment for access to public decision-making and/or that civil society is not freely and proactively accessing public decision-making in relation to EITI.</p>	<p>-</p>	<p>Consulted stakeholders agreed that CSOs can easily access to decision making process, and that particularly with relation to EITI, they tend to lead many of the decisions and debates.</p>		
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#### MSG oversight (Requirement 1.4)

EITI sub-Requirement	Summary of main findings	Source(s) of information	Summary of stakeholder views	Recommendation on compliance with the EITI provisions	Proposed corrective actions and recommendations
<p>Outreach to stakeholders prior to the establishment of the MSG (#1.4.a.i)</p>	<p>The Candidature Application Form has evidence on different outreach activities to stakeholders from different constituencies prior</p>	<p>Suriname's Candidature Application file: <a href="#">here</a>. (last accessed on 04 December 2020)</p> <p>Documents sent by CSOs via email: (i) two reports on members selection for the constituency</p>	<p>Members of the MSG confirmed that the establishment of the group was first led by the CSOs (through Projekta) in 2015, engaging with</p>	<p>Meaningful progress</p>	<p>See the main text.</p>

	to the establishment of the MSG.	(one of the initial selection of the civil society representatives in 2016 and another for a new member in 2017), and (ii) documentation of the MSG members' liaison with other CSOs (mailing list of the larger civil society group which receive the updates and calls for nominations, example of emails sent, documents from a CSO brainstorm session held in January 2019).	government. After the commitment to implement EITI and with the help of Projekta, the MONR sent invitations to the kick-off workshop on EITI. Finally, in April 2016 they hosted the first workshop on EITI.		
Codification of the process by which each stakeholder group nominated their representatives (#1.4.a.ii)	While the Candidature Application Form explains briefly the process of constituency to nominate their representatives, there is no concrete evidence of codifications regarding the nomination and representation within the government and industry constituency. CSOs, have a well-documented process. No evidence of government and industry's specific codification. The process for CSOs is described in the candidature file.	Suriname's Candidature Application file: <a href="#">here</a> . (last accessed on 04 December 2020)  Section 4.3 'Nomination and Qualifications' of the MSG ToRs: <a href="#">here</a> (Last accessed on 5 December 2020)	Many explained that each constituency has selected their own representative, and no stakeholders consulted expressed any concerns on this point.		



<p>Civil society and companies have appointed their own representatives (#1.4.a.ii)</p>	<p>CSOs and companies have appointed their own representatives.</p>	<p>Suriname's Candidature Application file: <a href="#">here</a>. (last accessed on 04 December 2020)</p> <p>Documents sent by CSOs via email. See above.</p>	<p>CSOs and companies consulted have confirmed appointing their own representatives without interference from the other constituencies.</p>		
<p>Internal rules for changing MSG representatives have been followed (#1.4.a.ii; #1.4.b.vi)</p>	<p>From 2017 to 2019 there were a few changes in MSG representatives, mainly alternates. There is no evidence to conclude internal procedures were not followed.</p>	<p>4.3 'Nomination and Qualifications' and 4.4 'Terms and terminations' of the MSG ToRs: <a href="#">here</a>. (Last accessed on 04 December 2020)</p> <p>For CSO representation renewal, they shared via email the presentation which they used for discussing the topic in January 2019.</p>	<p>Stakeholders consulted said rules were followed for changing representatives. They added that the few times members were changed, outside the alternation established for the three years period.</p>		
<p>The MSG includes appropriate stakeholders and MSG members have sufficient capacity to carry out their duties (#1.4.b.i)</p>	<p>The section 4.3.b) of the MSG ToRs describe all characteristics to be filled by MSG representatives. It seems the MSG includes appropriate stakeholders and the members have sufficient capacity to carry out their duties.</p>	<p>4.3 'Nomination and Qualifications' of the MSG ToRs: <a href="#">here</a>.</p> <p>(Last accessed on 04 December 2020)</p> <p>MSG Meeting attendance (Annex B)</p>	<p>See main text</p>		

<p>Decision-making is conducted in an inclusive way, treating each constituency as a partner (#1.4.b.vii)</p>	<p>There is no evidence to conclude that decision-making is not conducted in an inclusive way.</p>	<p>'7.2. Decision-Making' of the MSG ToR: <a href="#">here</a>.</p> <p>(Last accessed on 04 December 2020)</p> <p>MSG meeting minutes.</p> <p>Statement from CSOs on EITI-SR MSG Chair position (July 2019).</p>	<p>Stakeholders have explained that the communication within the MSG is very fluent. Nonetheless, some referred to a minor issue in the MSG, back in 2017, when there was a discussion about having a 10th independent member chairing the MSG meetings with no vote (the proposal was in the end dismissed).</p>		
<p>The MSG's ToR outline the role and responsibilities of MSG members and MSG members are effectively carrying out their tasks, including outreach with constituency (#1.4.b.i-iii)</p>	<p>Yes, the MSG ToR covers all the issues of 1.4.b, outlining in its article 3 the role and responsibilities of MSG members. There is no reason to conclude that MSG members are not effectively carrying out their tasks. Within the CSOs group there is some evidence related to outreach activities to the broader constituency, but this is not the case for the companies and the government.</p>	<p>MSG ToRs: <a href="#">here</a>.</p> <p>(Last accessed on 04 December 2020)</p>	<p>Several stakeholders have indicated that one of the main challenges has been to have a good functioning NS, which has translated into the MSG being burdened with certain tasks that should be their responsibility.</p>		

The MSG's ToR give the MSG a mandate to approve work plans, the appointment of the IA, EITI Reports and annual activity reports (#1.4.b.v-vi)	Yes, in 3.1 'Responsibilities and function of the MSG' the ToR give the MSG a mandate to approve work plans, the appointment of the IA, EITI Reports and annual activity reports, among others.	3.1 'Responsibilities and function of the MSG ToRs: <a href="#">here</a> . (Last accessed on 04 December 2020)	This was confirmed by the stakeholders, who explained the work plans and ToRs for the IA have been approved during MSG meetings.		
The MSG's ToR include internal governance rules and procedures, the per diem policy is public and these are followed in practice (#1.4.b.vii-ix)	Article 4 on 'MSG Membership' includes internal governance rules and procedures. There is not a per diem policy. There is no evidence that internal governance rules are not followed in practice.	Section 4 'MSG Membership': <a href="#">here</a> (Last accessed on 04 December 2020)	There is no indication that per diems are paid in practice.		

**Work plan (Requirement 1.5)**

EITI sub-Requirement	Summary of main findings	Source(s) of information	Summary of stakeholder views	Recommendation on compliance with the EITI provisions	Proposed corrective actions and recommendations
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<p>The work plan includes objectives for implementation linked to the EITI principles and national priorities and steps to mainstream EITI implementation (#1.5.a)</p>	<p>Yes, objectives 3 and 4 of the latest 2019-2020 work plan include activities for implementation linked to the EITI principles national priorities, such as communication efforts and BO disclosures.</p>	<p>2019-2020 work plan: <a href="#">here</a>. (Last accessed on 04 December 2020)</p> <p>2016-2018 work plan: <a href="#">here</a>. (Last accessed on 04 December 2020)</p>	<p>During consultations, some stakeholders mentioned that there are issues high on the extractive agenda in Suriname, which are not reflected on the work plan. In terms of plans for systematic disclosure, some stakeholders emphasized that these are quite vague.</p>	<p>Inadequate progress</p>	<p>See the main text.</p>
<p>The work plan reflects consultations with key stakeholders on objectives for implementation (#1.5.b)</p>	<p>The work plan 2019-2020 does not reflect consultation with key stakeholders on objectives for implementation. Despite this, it seems it was endorsed by the whole MSG, and there are some emails indicating endorsement from the wider CSO constituency.</p>	<p>2019-2020 work plan: <a href="#">here</a>. (Last accessed on 04 December 2020)</p> <p>Documents sent by CSOs via email showing the MSG members' liaison with other CSOs (mailing list of the larger civil society group, example of emails sent, documents from a CSO brainstorm session held in January 2019).</p>	<p>Some stakeholders said the work plan is a good reflection of the MSG priorities, as well as those from wider groups. Nonetheless, other emphasized that the work plan could be more detailed. The CSOs have explained that, they share information on the work plan with external CSOs and have received their feedback. In both work plans the World Bank had a lot of input.</p>		

<p>The work plan includes measurable and time-bound activities to achieve the agreed objectives (#1.5.c)</p>	<p>Yes, activities 3 to 5 of the 2019-2020 work plan include measurable and time-bound activities to achieve the agreed objectives.</p>	<p>2019-2020 work plan: <a href="#">here</a>. (Last accessed on 04 December 2020)</p>	<p>Some stakeholders mentioned that the workplan has been a good foundation for EITI work in Suriname but has also been very static with lacking updates.</p>		
<p>The work plan includes activities aimed at addressing any capacity constraints identified (#1.5.c.i)</p>	<p>No. While the 2019-2020 work plan include a component in their budget (revised to June 2019) on EITI-SR Secretariat Capacity Building of USD 1,500, there are no specific activities aimed at addressing any capacity constraints.</p>	<p>2019-2020 work plan: <a href="#">here</a>. (Last accessed on 04 December 2020)</p>	<p>Stakeholders said that given the limited resources for EITI implementation they had to focus on the basic requirements for meeting the standard.</p>		
<p>The work plan includes activities related to the scope of EITI reporting including plans for addressing technical aspects of reporting, such as comprehensiveness (4.1) and data</p>	<p>Yes, the 2019-2020 work plan includes in Activity 3 plans related to the scope of EITI reporting. There are no specific objectives on addressing technical aspects such as comprehensiveness and data reliability.</p>	<p>2019-2020 work plan: <a href="#">here</a>. (Last accessed on 04 March 2020)</p>	<p>Some stakeholders highlighted that the work plans lack a broader approach to the sector and focus solely on reporting and complying with the deadlines.</p>		

reliability (4.9). (#1.5.c.ii)					
The work plan includes activities aimed at addressing any legal or regulatory obstacles identified (#1.5.c.iii)	Partially. Activity 4 'Implement the Beneficial Ownership Roadmap' includes specific activities related to addressing the legal obstacles to disclose beneficial owners, but there are other issues such as contract transparency and the legal barriers for their disclosure, which are not at all addressed in the work plan.	Activity 4 'Implement the Beneficial Ownership Roadmap' of the 2019-2020 work plan: <a href="#">here</a> . (Last accessed on 04 March 2020)	Some stakeholders highlighted that there are some new elements of the EITI Standard, such as contract transparency, which have not been addressed yet.		
The work plan includes plans for implementing the recommendations from Validation and EITI implementation (#1.5.c.iv)	No, the 2019-2020 work plan does not include any plans. However, it mentions the preparation of the first validation of Suriname as a cross-cutting objective for the MSG.	'Goal and Objectives' of the 2019-2020 work plan: 2019-2020 work plan: <a href="#">here</a> . (Last accessed on 04 March 2020)	See main text.		
The work plan includes costings and funding sources, including domestic and external sources	Partially. For some activities, the 2019-2020 work plan includes costings and funding sources. There is a budget on p.15 describing the total available funds	2019-2020 work plan: <a href="#">here</a> . (Last accessed on 04 December 2020)	The financial structure for supporting the EITI process in Suriname has been highlighted several times as one of the		

of funding and technical assistance (#1.5.d)	from the World Bank grant (which ended on 30 September 2020).		biggest challenges for implementation.		
The work plan includes a timetable for implementation (#1.5.g)	Yes, the last column of all the tables included in the 2019-2020 work plan provide a timetable for implementation.	2019-2020 work plan: <a href="#">here</a> . (Last accessed on 04 March 2020)	See the main text		
The workplan has been made widely available to the public (#1.5.e)	Yes, the 2019-2020 work plan has been made publicly available.	2019-2020 work plan: <a href="#">here</a> . (Last accessed on 04 March 2020)	See the main text		
The work plan reflects the MSG's consideration of extending the detail and scope of EITI reporting (#1.5.f)	Partially. The 'Goals and Objectives' of the 2019-2020 work plan (p.2) consider the MSG's intentions to extend the scope of EITI reporting to gender, labour, and environmental data.	'Goals and Objectives' of the 2019-2020 work plan: <a href="#">here</a> . (Last accessed on 04 March 2020)	See the main text		



## EITI disclosures

## Requirement 2: Legal and institutional framework, including allocation of contracts and licenses.

Assessment table: <u>Legal and institutional framework, including allocation of contracts and licenses</u>					
Legal framework (#2.1)					
EITI sub-requirement	Summary of main findings	Source(s) of information	Summary of stakeholder views	Recommendation on compliance with the EITI provisions	Proposed corrective actions and recommendations
The Report discloses a description of the legal framework.	<p>Yes, the report provides an overview of relevant laws and regulations applicable to all companies, and mining and oil companies, specifically (pp.27-30).</p> <p>The report refers to Section 3.2 of the 2016 EITI Report for more in-detail legal framework information. It also refers to the Suriname's Parliament website which collects all relevant laws and regulations in Suriname.</p>	<p>2017 EITI Report, "Fiscal and Legal Framework", pp.27-30: <a href="#">here</a>. (accessed 07 January 2020).</p> <p>2016 EITI Report, "Legal and Tax Framework, procedures, contracts and licenses", pp.42-52: <a href="#">here</a>. (Last accessed on 07 January 2020).</p> <p>Parliament website, "Wetgeving": <a href="#">here</a> (accessed 07 January 2020)</p>	No stakeholders consulted expressed concerns of legal framework disclosures. Most industry representatives from both the mining and oil gas sectors considered the description of the legal environmental and fiscal frameworks in the 2017 EITI Report and the Suriname's Parliament website to be accurate. Some government representatives noted they had not actively participated in the description of the legal framework section as this has been left to the IA. However, a government representative considered the draft mining law a significant reform and	Satisfactory progress	See the main text.

			wished it can be discussed within the MSG.		
The Report discloses a description of the regulations, and information on the roles and responsibilities of the relevant government agencies.	Yes, the Report provides an overview of the roles and responsibilities of key government entities in oil, gas, and mining, including links to the publicly available information related to three government agencies, the MONR, the MOF and the Geological Mining Service.	<p>2017 EITI Report, Section 4.5 “Governments Bodies included”, pp.52-53: here. (accessed 07 January 2020).</p> <p>Ministerie van Natuurlijke Hulpbronnen (Ministry of Natural Resources): here.</p> <p>Ministerie van Financiën (Ministry of Finance): here.</p> <p>Geologisch Mijnbouwkundige Dienst (Geological Mining Service): here.</p>	No stakeholders consulted expressed concerns regarding roles and responsibilities of relevant government agencies disclosures in the EITI Report. Several stakeholders from all constituencies and development partners highlighted the key role played by the Ministry of Natural Resources and Staatsolie in overseeing the mining, and oil sector respectively. The IA and a senior government representative confirmed that the role of the Central Bank has increased in recent years in terms of collection of production and export data, and the maintenance of the MOF's accounts to receive royalty payments from gold exporters, and payments related to the sale of in-kind royalties (similar situation to Grasaalco's accounts).		

<p>The Report discloses a description of the fiscal regime governing the extractive industries.</p>	<p>Partially. While the Report provides an overview of the main fiscal laws including a brief explanation of the content (rates where applicable), it did not provide a description of fiscal terms for mining, and oil and gas, specifically.</p> <p>The report refers to Section 3.2 of the 2016 EITI Report for more in-detail fiscal regime information. It also refers to the Suriname's Parliament website which collects all relevant laws and regulations in Suriname.</p>	<p>2017 EITI Report, "Fiscal and Legal Framework, pp.27-29" 4.1.3. Legal/Contractual basis of payment transactions, p.46": <a href="#">here</a>. (accessed 07 January 2020).</p> <p>2016 EITI Report, "Legal and Tax Framework, procedures, contracts and licenses", pp.42-52: <a href="#">here</a> (Last accessed on 07 January 2020).</p> <p>Parliament website, "Wetgeving": <a href="#">here</a> (Last accessed on 07 January 2020)</p>	<p>A number of stakeholders consulted expressed concerns regarding fiscal regime disclosures in PSCs as the latter are not publicly available. While a PSC model is publicly available, some stakeholders expressed their concerns regarding a lack of awareness of tax incentives provided in PSCs. Government representatives and industry stakeholders confirmed that royalty regimes in cash and in-kind are reflected in mineral agreements. While several government and industry stakeholders confirmed that mining agreements are publicly available, anyone was able to provide the source.</p>		
<p>The Report discloses the level of fiscal devolution.</p>	<p>No, the report does not provide an overview of the degree of fiscal devolution in the extractive industries.</p>	<p>-</p>	<p>The IA and different stakeholders clarified that no direct subnational payments specific to the extractives sector exists in Suriname.</p>		
<p>Where the government is undertaking</p>	<p>Yes, when reviewing the status of recommendations made by the IA in the 2016</p>	<p>2017 EITI Report, Section 6.2 "Status of recommendations of fiscal year report 2016",</p>	<p>A few stakeholders confirmed that the Government of Suriname is currently undertaking a revision of its</p>		

reforms, the MSG documented these reforms.	EITI Report, the Report confirmed there is a new Mining Law being drafted and underway. (p.76) Reforms to the mining Law has been raised by different including the World Bank Organisation.  The 2017 Report also confirms the submission of a draft environmental framework law to the DNA of Suriname.	p.76: <a href="#">here</a> . (accessed 07 January 2020).  DNA website: <a href="#">here</a> .  World Bank: <a href="#">here</a> .	1986 Mining Code, as mining legislation is out of date, and does not reflect current best practice. There were no comments from stakeholders regarding reform to the environmental regulations.		
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License allocations (#2.2)					
EITI sub-requirement	Summary of main findings	Source(s) of information	Summary of stakeholder views	Recommendation on compliance with the EITI provisions	Proposed corrective actions and recommendations
The Report discloses information related to the awards and transfers of licenses pertaining to the	For mining, Table 5.9 of the Report identifies the number of mining licenses awarded (19) and transferred (2) in 2017 based on an overview of GMD. It however does not disclose the list of specific	For mining:  2017 EITI Report, section 5.2.2 "Bid rounds Mining Allocation of licensing and contracts and contract disclosure mining". Table 5.9, p. 60, section 2.2 "Oil and	See the main text.	Inadequate progress	See the main text.

<p>companies covered in the EITI Report.</p>	<p>licenses awarded and transferred nor the identity of the recipient. At the same time, it is not clear whether these licenses were all licenses awarded only to the companies covered in the EITI Report in Suriname in 2017.</p> <p>P.14 of the report lists all licenses awarded to three companies: RGM, Newmont, and Grassalco which sums 37 in total.</p> <p>For oil and gas, the report lists two oil allocations during 2017 identifying recipients (p.69-70). It however does not confirm whether there were transfers of any oil and gas licenses. Moreover, the Report highlights there is not information available regarding oil concessions granted to Staatsolie. (p.70).</p>	<p>Mining Industry in Suriname 2017”, p. 14, <a href="#">here</a>. (accessed 07 January 2020).</p> <p>GMD database is not publicly available.</p> <p>For oil:</p> <p>2017 EITI Report, section 5.3.2. “Bid rounds Oil Allocation of licensing and contracts and Contract disclosure oil”, pp.69-70: <a href="#">here</a>. (accessed 07 January 2020).</p> <p>Staatsolie list of oil concessions granted during 2017 is not publicly available.</p>			
<p>The Report discloses a description of</p>	<p>No, the process for awarding and transferring mining, and oil licenses has</p>	<p>-</p>	<p>See the main text.</p>		

the process for transferring or awarding the license (2.2,a,i)	not been comprehensively disclosed.				
The Report discloses the technical and financial criteria used (2.2,a,ii)	No, the technical and financial criteria assessed in the process for awarding and transferring mining, oil and gas licenses have not been comprehensively disclosed.	-	See the main text.		
The report explains any non-trivial deviations from the applicable legal and regulatory framework governing license transfers and awards (2.2,a,iv)	No, information on any non-trivial deviations from the applicable legal and regulatory framework governing license transfers and awards has not been comprehensively disclosed.	-	See the main text.		
The government is required to disclose the existence of bidding rounds including the list of applicants and	While the report confirms the existence of a bidding round in 2017 for blocks 61 and 62, it does not include the list of applicants and the bid	2017 EITI Report, Section 3.4.2 Oil Companies, p.37-38: <a href="#">here</a> . (Last accessed on 07 January 2020).	See the main text.		

the bid criteria. (2.2.b)	criteria have been not comprehensively disclosed.				
<i>Information on the award of licenses held by material companies not awarded or transferred in the year under review has not been disclosed.</i>	<i>The report does not disclose information on the awards and transfers of licenses not awarded or transferred in 2017.</i>	-	See the main text.		
<i>The MSG group may wish to include additional information on the allocation of licenses in the EITI Report, including commentary on the efficiency and effectiveness of licensing procedures.</i>	<i>Additional information about the allocation/transfers of licenses including the efficiency and effectiveness of these systems has not been disclosed. The report includes commentary on the reliability of data included in the GMD database.</i>	2017 EITI Report, section 5.2.2 “Bid rounds Mining Allocation of licensing and contracts and contract disclosure mining”. Table 5.9, p. 60: <a href="#">here</a> . (Last accessed on 07 January 2020).	See the main text.		

### Register of licenses (#2.3)



EITI sub-requirement	Summary of main findings	Source(s) of information	Summary of stakeholder views	Recommendation on compliance with the EITI provisions	Proposed corrective actions and recommendations
Implementing countries are required to maintain a publicly available register or cadastre system(s). (2.3,b)	The Report confirms that while GMD maintains a database, and Staatsolie maintains a list of oil concessions granted to the SOE, there are not publicly accessible registers of licenses for mining, and oil.	2017 EITI Report, pp.59-60: <a href="#">here</a> . (Last accessed on 07 January 2020).	See the main text.	Inadequate progress	See the main text.
The Report discloses license holders regarding each of the licenses pertaining to companies covered in the EITI Report (2.3,b,i)	<p>For mining, the report lists the mining licenses hold by the three large mining companies: RGM, NS and Grassalco. While NV1 and 15 companies associated with SHMR are considered material and within the EITI implementation scope, there was not a list of licenses held by these companies.</p> <p>For oil, while the report lists the oil material companies, there is not a list of oil licenses held by each of these companies.</p>	2017 EITI Report, pp.51-52: <a href="#">here</a> . (Last accessed on 07 January 2020).	See the main text.		

<p>The Report discloses coordinates of license areas pertaining to companies covered in the EITI Report, where collated (2.3,b,ii)</p>	<p>License coordinates have not been comprehensively disclosed for any licenses held by material companies.</p>	<p>-</p>	<p>See the main text.</p>	
<p>The Report discloses the date of application, date of award and duration of the license. (2.3,b,iii)</p>	<p>Suriname does not have a mining cadastre or an oil concessions database publicly available where to find out timely dates of application, award and expiry (or duration) for all licenses held by material companies. The Report does not disclose the information mentioned above. For the three large mining material companies (RGM, Newmont and Grassalco), the Report discloses some data.</p>	<p>2017 EITI Report, “Licenses issued to RGM, NS/Surgold and Grassalco”, p.61: <a href="#">here</a>. (Last accessed on 07 January 2020).</p>	<p>See the main text.</p>	
<p>The Report discloses the commodity being produced in the case of production licenses. (2.3,b,iii)</p>	<p>While the Reporting templates included in the Annex 3 of the Report include the obligation for material companies to include information on commodity(ies) covered by production licenses for all production licenses, these reporting templates seems to do not be publicly available.</p>	<p>Annex 3 of the 2017 EITI Report: <a href="#">here</a>. (Last accessed on 07 January 2020).</p>	<p>See the main text.</p>	

It is expected that the licenses register, or cadastre includes information about licenses held by all entities, including companies and individuals or groups that are not included in the Report. (2,3,b)	No, the information set out in provision 2.3.b is no available for the licenses held by entities not covered by the EITI reporting process.	-	See the main text.		
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<b>Contracts (#2.4)</b>					
<b>EITI sub-requirement</b>	<b>Summary of main findings</b>	<b>Source(s) of information</b>	<b>Summary of stakeholder views</b>	<b>Recommendation on compliance with the EITI provisions</b>	<b>Proposed corrective actions and recommendations</b>
Implementing countries are encouraged to publicly disclose any contracts and	For mining, while the report does not state whether mining contracts are publicly available, the National Assembly portal	2017 EITI Report, “Contract Disclosure Mining”, pp.61,70: <a href="#">here</a> . (Last accessed on 07 January 2020).	For oil, a representative from Staatsolie confirmed their commitment to make PSCs publicly available. An industry representative highlighted it is up to Staatsolie to decide whether to publish	Satisfactory progress	See the main text.

<p>licenses that provide the terms attached to the exploitation of oil, gas and minerals. (2.4,a)</p>	<p>collects the two main mining contracts approved by Parliament. The 2017 EITI report seems to state that small-scale mining contracts exist in Suriname but are not publicly available. The 2016 EITI Report confirms otherwise. For oil, while the PSC model is publicly available, the report confirms that oil contracts are not publicly disclosed. The Resource Contracts portal lists two oil and gas PSCs. The Report confirms that mining licenses are not publicly available. Oil licenses are awarded through PSCs in Suriname, which are not publicly available.</p>	<p>PSC Model:  <a href="https://www.staatsolie.com/media/tuvjyme3/model-psc.pdf">https://www.staatsolie.com/media/tuvjyme3/model-psc.pdf</a>          (last accessed on 16 January 2020)</p> <p>National Assembly website:          Newmont: <a href="#">here</a>.          RGM: <a href="#">here</a>.</p>	<p>the PSCs in force they have agreed with them.</p> <p>For mining, industry and government representatives confirmed that mining agreements between the Government of Suriname and large-scale mining companies are publicly available in the National Assembly's website. Small-scale mining company representative confirmed the possibility to publish their contracts in the medium to long term. While a government representative confirmed their commitment to publish mining licenses under the new mining licenses database which is under development. It was confirmed the existence of a standard format and little deviations.</p>		
<p>The Report documents any reforms that are planned or underway. (2.4,b)</p>	<p>Partially, the Report confirms that the Staatsolie "will work towards disclosure of the signed PSCs going forward".</p>	<p>2017 EITI Report, "Contract Disclosure Mining", p.70: <a href="#">here</a>. (last accessed on 16 January 2020)</p>	<p>A representative from Staatsolie confirmed that there are modifications that are planned underway to make PSCs publicly available, although concrete steps were not provide.</p>		

<p>The Report documents the government policy on disclosure of contracts and licenses that govern the exploration and exploitation of oil, gas and minerals.</p>	<p>The 2017 EITI Report clarifies Staatsolie's commitment to publish all PSCs going forward. The Report highlights the lack of legal provisions that require transparency of PSCs. However, the report does not clarify the government's policy on contract disclosure in the mining sector, or licenses aside from a confirmation that while mining licenses are not publicly disclosed, most issued mining licenses <i>"are generally edited in a standard format and are made specific where necessary"</i>.</p>	<p>2017 EITI Report, "Contract Disclosure Mining", p.70: <a href="#">here</a>. (last accessed on 16 January 2020)</p>	<p>Stakeholders from all constituencies confirmed that the government's policy was to publish all extractives contracts.</p>		
<p>The report documents actual contract disclosure practices. (2.4,b)</p>	<p>Yes, for oil, contracts are not disclosed. For mining, contracts are publicly available.</p>	<p>2017 EITI Report, "Contract Disclosure Mining", pp.61,70: <a href="#">here</a>. (last accessed on 16 January 2020)</p>	<p>See Requirements 2.4, a.</p>		

### Beneficial ownership (#2.5)

EITI sub-requirement	Summary of main findings	Source(s) of information	Summary of stakeholder views	Recommendation on compliance with the EITI provisions	Proposed corrective actions and recommendations
The MSG has agreed an appropriate, publicly available definition of the term beneficial owner (#2.5.f.ii).	No, the MSG has not agreed an appropriate, publicly available definition of the term beneficial owner. The 2019-2020 work plan established as an activity (4.2.1) the adoption of a definition of beneficial ownership. While this activity was supposed to take place by Q4 2019, the most recent development is the recommendation reflected in the BO Assessment Document mentioned in the main text.	2019-2020 work plan: <a href="#">here</a> . (last accessed on 4 March 2020)  Bissessur & Co. P.P.G. Bissessur LL.M. A legal assessment of the institutional framework for BO in Suriname and advice on the first steps of BO implementation. November 2020. Shared with the NS and IS. No publicly available.	National secretariat's representatives confirmed that the MSG did not agree an appropriate definition of the term beneficial owner.	Inadequate Progress	See the main text.
<i>The country maintain a publicly available register of the beneficial owners (#2.5.a).</i>	<i>Suriname does not maintain a public register of beneficial owners. The 2019-2020 work plan however established as an activity (4.1.2) the identification of legal, regulatory and practical barriers to disclose BO data. The most recent development is the recommendation reflected in the BO Assessment Document mentioned in the main text where a public BO registry is recommended to be set up within the Trade Register.</i>	2019-2020 work plan: <a href="#">here</a> . (last accessed on 4 March 2020)  Bissessur & Co. P.P.G. Bissessur LL.M. A legal assessment of the institutional framework for Beneficial Ownership (BO) in Suriname and advice on the first steps of BO implementation. November	Different stakeholders confirmed the lack of public register of beneficial owners.		

		2020. Shared with the NS and IS. No publicly available.			
The EITI Report documents the government's policy and MSG's discussion on disclosure of beneficial ownership. (#2.5.b)	There were not documents provided documenting the government's policy on BO. There are two 2017 MSG Meeting Minutes on discussions related to the BO Roadmap and approval. There are not more recent MSG discussions.	<p>Item 4 of Meeting Minute 14 of 2017 where the Secretariat provided the first draft BO Roadmap.</p> <p>Item 5 of Meeting Minute 15 of October 2017 where the MSG approved the BO Roadmap.</p> <p>MSG Meeting minutes are not publicly available but were shared with the International Secretariat.</p> <p>2017 BO Roadmap: <a href="#">here</a>.</p>	Stakeholders from all constituencies confirmed the government's commitment to BO disclosure for all companies in Suriname, although concrete steps in doing so were not shared. National Secretariat's representatives confirmed the existence of the BO Roadmap as the latest development on these matters.		
Implementing countries request, and companies disclose, beneficial ownership information for inclusion in the EITI Report. (#2.5.c).	The Report shows that Suriname has requested BO information to be publicly disclosed. While it is shown through the Index to Templates included in the Report, there is not disclosure of beneficial ownership data.	2017 EITI Report, G1 Index/Page 1 of 1: <a href="#">here</a> . (Last accessed on 17 January 2020)	See the main text.		



<p>Implementing countries request, and companies disclose, request relevant beneficial owner's information including the identity(ies) of their beneficial owner(s), including nationality, country of residence, the level of ownership and details about how ownership or control is exerted (#2.5.c-d)</p>	<p>No, the BO template however seems to request relevant beneficial owner's information including the identity(ies) of their beneficial owner(s), including nationality, country of residence, the level of ownership and details about how ownership or control is exerted.</p> <p>No information related to the identification of politically exposed persons has been requested.</p>	<p>2017 EITI Report, BO Overview: <a href="#">here</a>. (last accessed on 17 January 2020)</p>	<p>The IA confirmed that no beneficial owner's information was disclose by reporting companies albeit the information was requested in the last reporting cycle. The IA however noticed that the experience thus far was that company management tended to report legal shareholders as beneficial owners.</p>		
<p>Any corporate entity that apply for or hold a participating interest in an exploration or production oil,</p>	<p>No, there is no evidence of any corporate entity that apply for or hold a participating interest in an exploration or production oil, gas or mining license or contract disclosing beneficial ownership information.</p>	<p>-</p>	<p>Stakeholders confirmed that no corporate that apply or hold a participating interest in an exploration or production oil, gas or mining license or contract</p>		

gas or mining license or contract disclose beneficial ownership information. (#2.5.c)			disclosed beneficial ownership information.		
The EITI Report documents gaps or weaknesses in disclosure of beneficial ownership information (#2.5.c)	No, there is no evidence on the MSG assessing and documenting gaps or weaknesses in disclosure of beneficial ownership information. However, the recent BO Assessment Document provides an overview on this.	Bissessur & Co. P.P.G. Bissessur LL.M. A legal assessment of the institutional framework for Beneficial Ownership (BO) in Suriname and advice on the first steps of BO implementation. November 2020. Shared with the NS and IS. No publicly available.	National secretariat's representatives confirmed that the MSG did not assess gaps or weaknesses in disclosure of beneficial ownership information yet.		
The MSG establishes an approach for participating companies to assure the accuracy of the beneficial ownership information.	There is no evidence of any relevant government entity or the MSG establishing an approach for participating companies to assure the accuracy of the beneficial ownership information.	-	National secretariat's representatives confirmed that the MSG did not establish an approach for participating companies to assure the accuracy of the beneficial ownership information yet.		
There is an identification of	There is no evidence of the identification of public listed companies	-	Industry representatives from the two mining		

public listed companies for beneficial ownership reporting purposes. (#2.5.f)	for BO reporting purposes. Thus, the Report does not provide any disclosure of the name of the stock exchange or links included to the stock exchange filings where public companies are listed. However, there is up-to date information of the two large mining companies listed on the Stock Exchanges.		subsidiaries, RGM and Newmont, operating the two large scale mines in Suriname confirmed that their headquarters are public listed companies: IAMGOLD is listed on the Toronto Stock Exchange, and the NYSE, and Newmont is listed in the NYSE.		
The EITI Report discloses the legal owners and share of ownership of applicable companies.	Yes, for oil and mining, the Report discloses information about legal owners and share of ownership of applicable companies.	2017 EITI Report, “5.2.3.3. Beneficial Ownership Mining - Table 5.15” and “5.3.3.3 Beneficial Ownership - Table 5.22”, pp.65, 71-72: <a href="#">here</a> . (last accessed on 17 January 2020)	Industry representatives from the mining and oil sectors confirmed that legal owners were reported in the last reporting cycle rather than beneficial owners.		

### State-participation (#2.6)

EITI sub-requirement	Summary of main findings	Source(s) of information	Summary of stakeholder views	Recommendations on compliance with the EITI provisions	Proposed corrective actions and recommendations
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<p>The Report confirms whether there is state participation in the extractive industries that gives rise to material revenue payments. (#2.6. a)</p>	<p>Yes, the existence of two material SOEs (Staatsolie and Grassalco) engaged in the extractive sector has been publicly documented (#2.6. a)</p> <p>While NV1 has been recognized as a SOE, the Report confirms it has not been recognized as reporting company for FY 2017 (p.57).</p>	<p>2017 EITI Report “4.3.1 Flows of payment, p. 49”. “3.5.1 State Participation in the extractives sector (req 2.6/4.5), p. 44”, “5.1 General, p.57”: <a href="#">here</a>. (last accessed on 17 January 2020)</p>	<p>See the main text.</p>	<p>Meaningful progress</p>	<p>See the main text.</p>
<p>Implementing countries must disclose an explanation of the prevailing rules and practices regarding the financial relationship between the government and state-owned enterprises (SOEs), e.g., the rules and practices governing transfers of funds between the SOE(s) and the state, retained earnings, reinvestment and third-party financing. (#2.6.a)</p>	<p>Yes, an explanation of the role of the material SOEs identified in the sector has been disclosed (p.52, p.66).</p> <p>While no prevailing rules regarding the financial relationship between the government and SOEs has been disclosed, three practices regarding the financial relationship between the Government of Suriname and Staatsolie has been disclosed (pp.71-72). ‘</p> <p>EITI Report provides the actual figures for each material SOEs distribution of dividends, transfers from governments, and third-party financing. It is not clear whether retained earnings or reinvestments exist in 2017.</p>	<p>For Staatsolie:</p> <p>2017 EITI Report, «Oil companies, p. 52”, «5.3.3.1 The sale of the state’s share of production or other revenues collected in-kind and financing of companies by the governments, pp.71-72”: <a href="#">here</a>. (last accessed on 17 January 2020)</p> <p>For Grassalco, «GRASSALCO, p. 66»: <a href="#">here</a>. (last accessed on 17 January 2020)</p>	<p>See the main text</p>		
<p>Disclosures from the government and SOE(s) of their level of ownership in</p>	<p>Partially. The Government of Suriname have disclosed its level of ownership in mining, and oil companies operating within the</p>	<p>2017 EITI Report, “State participation in the extractive industry, p.20”, “3.5.1 State</p>	<p>See the main text</p>		

<p>mining, oil and gas companies operating within the country's oil, gas and mining sector, including those held by SOE subsidiaries and joint ventures, and any changes in the level of ownership during the reporting period. (#2.6.b)</p>	<p>country's oil, gas and mining sector. The terms associated with these ownership interests have not been disclosed, nor there are references to specific section in Staatsolie and Grassalco Annual Reports.</p> <p>Staatsolie has disclosed its level of ownership in mining, oil and gas companies operating within the country's oil and mining sector, including those held by its four subsidiaries and one JV (p.27). The terms associated with these ownership interests have not been disclosed.</p> <p>Grassalco had not disclosed similar data.</p>	<p>Participation in the Extractive Sector (req 2.6/4.5), p.44": <a href="#">here</a>. (last accessed on 17 January 2020)</p>			
<p>The Report discloses any changes in the level of government and SOE ownership during the EITI reporting period. (#2.6.b)</p>	<p>The Report confirms the lack of changes in the level of state ownership in Staatsolie during 2017 (p.72) but not for Grassalco or any of the two SOEs' subsidiaries, and affiliates, or the joint-venture where Staatsolie has a 25% interest.</p>	<p>2017 EITI Report, "5.3.3.3 Beneficial ownership oil companies, p.72": <a href="#">here</a>. (last accessed on 17 January 2020)</p>	<p>See the main text.</p>		
<p>Where the government and SOE(s) have provided loans or loan guarantees to mining, oil and gas companies operating within the country, details on these transactions should be disclosed. (#2.6. b)</p>	<p>Yes, details about a loan from the Government of Suriname to Staatsolie has been disclosed, including loan tenor and terms (i.e. repayment schedule and interest rate).</p> <p>There are not disclosures related to loans or loan guarantees granted by Staatsolie or Grassalco to mining, oil and gas companies.</p>	<p>2017 EITI Report "5.3.3.1 The sale of the state's share of production or other revenues collected in-kind and financing of companies by the Government, p.71": <a href="#">here</a>. (Last accessed on 17 January 2020)</p>	<p>See the main text.</p>		

### Requirement 3: Exploration and production

Assessment table: Exploration and production					
Exploration data (#3.1)					
EITI sub-requirement	Summary of main findings	Source(s) of information	Summary of stakeholder views	Recommendation on compliance with the EITI provisions	Proposed corrective actions and recommendations
Implementing countries should disclose an overview of the extractive industries, including any significant exploration activities. (#3.1)	<p>The Report provides an overview of the extractive industries (pp. 24-27), including significant exploration activities in the mining and oil sectors.</p> <p>Significant exploration activities disclosed specifically correspond to RGM, Newmont and Grassalco (pp.32-33).</p> <p>Significant exploration activities for oil were disclosed in relation to six IOCs (pp.37-38).</p>	<p>2017 EITI Report, “3.1.2 Extractive Industry Suriname, pp.24-27”, “3.4.1.1 Exploration mining sector, pp.32-33”, and “3.4.2.1 Exploration oil sector, pp.37-38”: <a href="#">here</a>. (last accessed on 17 January 2020)</p> <p>Overview of activities IOCs in 2017:  <a href="https://www.staatsolie.com/media/ribfx3sh/staatsolie_annual-report-2017_online_final.pdf">https://www.staatsolie.com/media/ribfx3sh/staatsolie_annual-report-2017_online_final.pdf</a> (last accessed: 22 January 2020).            See: p.17</p>	<p>Some stakeholders consulted highlighted the existence of illegal mining.</p> <p>Stakeholders did not express any other particular views on the comprehensiveness of the coverage of extractive industries and exploration activities in the 2017 EITI Report.</p>	Satisfactory Progress	See the main text.

Production data (#3.2)					
EITI sub-requirement	Summary of main findings	Source(s) of information	Summary of stakeholder views	Recommendation on compliance with the EITI provisions	Proposed corrective actions and recommendations
Implementing countries must disclose production data for the fiscal year covered by the EITI Report, including total production volumes by commodity, and, when relevant, by state/region. (#3.2)	For mining, total gold production volumes have been disclosed for RGM, Newmont, Grassalco, and the SHMR, without disaggregation per small-scale mining company (pp. 14-15, pp.33-34, p.66). Silver and aggregate production volumes have been disclosed by RGM, and Grassalco, respectively (p.66). No production volumes data has been disclosed by the MONR. USGS 2016 Report on Suriname confirmed that there was bauxite or alumina production in 2016. For oil, total production volumes have been disclosed (pp.17-18, pp.39-40, p.72). Production	2017 EITI Report, “2.2 Oil and Mining Industry in Suriname 2017, pp.14-18”, “3.4.1.2 Production mining sector, pp.33-34”, “3.4.2.2 Production by oil companies, pp.39-40”, “5.2.3.2 Production and export mining companies, p.66”, “5.3.3.2 Production and export oil companies, p.71”: <a href="#">here</a> . (last accessed on 17 January 2020)  For oil, a general reference to the Staatsolie webpage has been made: <a href="https://www.staatsolie.com/">https://www.staatsolie.com/</a>	Several government and industry representatives confirmed that gold was the main mineral produced in 2017 with bauxite or alumina not being produced in Suriname since 2015. A government representative confirmed that while there is not record on other commodities produced in Suriname in 2017 different to the ones included in the report, it is unlikely that production of other minerals is material in comparison to gold.  Stakeholders did not express any particular views on the disclosure of oil production data by Staatsolie.	Satisfactory Progress	See the main text.



	data has been disclosed by Staatsolie.	2016 USGS Report on Suriname: <a href="#">here</a> .			
Implementing countries must disclose production data for the fiscal year covered by the EITI Report, including total production values by commodity, and, when relevant, by state/region. (#3.2)	For mining, total gold production values have been disclosed for RGM, Newmont, Grassalco, and the SHMR without disaggregation per small-scale mining company (pp. 14-15, pp.33-34, p.66). Silver and aggregate production values have been disclosed by RGM, and Grassalco, respectively (p.66). No gold, silver or other commodity (ies) production values data has been disclosed by the MONR. There was no production value data related to other commodities. For oil, total production value has been disclosed (pp.17-18, pp.39-40, p.72). Production value data has been disclosed by Staatsolie.	2017 EITI Report, “2.2 Oil and Mining Industry in Suriname 2017, pp.14-18)”, “3.4.1.2 Production mining sector, pp.33-34”, “3.4.2.2 Production by oil companies, pp.39-40”, “5.2.3.2 Production and export mining companies, p.66”, “5.3.3.2 Production and export oil companies, p.71”: <a href="#">here</a> (last accessed on 22 January 2020).  For oil, see Staatsolie webpage: <a href="#">here</a>  2016 USGS Report on Suriname: <a href="#">here</a> .	Same as above.		
The Report could include sources of the production data and information on	Partially. The sources of production data have been disclosed. Information on how production data has been	2017 EITI Report, “2.2 Oil and Mining Industry in Suriname 2017, pp.14-18)”, “3.4.1.2 Production mining sector, pp.33-	Stakeholders confirmed that the main sources of production data are the material reporting companies covered in the Report. Representatives from the Central		

how the production volumes and values disclosed in the EITI Report have been calculated. (#3.2)	calculated has not been disclosed.	34”, “3.4.2.2 Production by oil companies, pp.39-40”, “5.2.3.2 Production and export mining companies, p.66”, “5.3.3.2 Production and export oil companies, p.71”: <a href="#">here</a> (Last accessed on 22 January 2020).  For oil, see Staatsolie webpage: <a href="#">here</a>	Bank and the General Bureau of Statistics confirmed that there is no mining production data publicly available for the year under review. A representative from the Central Bank however confirmed that they collect production figures. A government representative confirmed that GMD has among its tasks to collate production data from mining companies, but due to lack of personnel and capacity GMD has not been able to do that.		
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Export data (#3.3)					
EITI sub-requirement	Summary of main findings	Source(s) of information	Summary of stakeholder views	Recommendation on compliance with the EITI provisions	Proposed corrective actions and recommendations
Implementing countries must disclose export data for the fiscal year covered by the EITI Report, including total export volumes of exports by commodity, and, when	For mining, gold export volumes have been disclosed corresponding to RGM and Newmont. Grassalco does not disclose gold export volumes, although there is a confirmation regarding the lack of significance. The Report also provides total export volumes for	2017 EITI Report, “2.2 Oil and Mining Industry in Suriname 2017, p.16, pp.18-19”, “3.4.1.3 Export mining companies, pp.35-36”, “3.4.2.3 Export oil companies, p.41”, “3.4.3. Overall view of export 2017 of the mining sector, p.43”, “5.2.3.2 Production and export mining	Stakeholders did not express any particular views on the disclosure of minerals and oil exports data. There was not consensus between	Satisfactory Progress	See the main text.

<p>relevant, by state/region of origin. (#3.3)</p>	<p>all commodities sourced from the Central Bank and Asycuda. (p.43) While the General Bureau of Statistics discloses exports data of mineral products, there is not disaggregation per commodity.</p> <p>For oil, total export volumes have been disclosed sourced from reports from Staatsolie, Asycuda and the Central Bank (pp.18-19, 41, 71).</p>	<p>companies, p.65”, “5.3.3.2 Production and export oil companies, p.71”: <a href="#">here</a>. (Last accessed: 22 January 2020).</p> <p>General Bureau of Statistics website: <a href="#">here</a>.</p> <p>For oil, see Staatsolie webpage: <a href="#">here</a></p>	<p>stakeholders on whether Grassalco exported gold under the year of review.</p>		
<p>Implementing countries must disclose export data for the fiscal year covered by the EITI Report, including total export values of exports by commodity, and, when relevant, by state/region of origin. (#3.3)</p>	<p>The Report provides total export volumes for all commodities sourced from the Central Bank and Asycuda. (p.43)</p> <p>For oil, total export values have been disclosed sourced from reports from Staatsolie, Asycuda and the Central Bank (pp.18-19, 41).</p>	<p>2017 EITI Report, “2.2 Oil and Mining Industry in Suriname 2017, p.16, pp.18-19”, “3.4.1.3 Export mining companies, pp.35-36”, “3.4.2.3 Export oil companies, p.41”, “3.4.3. Overall view of export 2017 of the mining sector, p.42”, “5.2.3.2 Production and export mining companies, p.65”, “5.3.3.2 Production and export oil companies, p.71”: <a href="#">here</a>. (Last accessed: 22 January 2020).</p> <p>For oil, see Staatsolie webpage: <a href="#">here</a>.</p>	<p>Same as above.</p>		
<p>The Report could include sources of the export data and</p>	<p>Partially. The sources of export data have been disclosed. Information on how export data</p>	<p>2017 EITI Report, “2.2 Oil and Mining Industry in Suriname 2017, p.16, pp.18-19”, “3.4.1.3 Export</p>	<p>Representatives from the Central Bank confirmed that they</p>		

information on how the export volumes and values disclosed in the EITI Report have been calculated. (#3.3)	has been calculated have not been disclosed.	mining companies, pp.35-36”, “3.4.2.3 Export oil companies, p.41”, “3.4.3. Overall view of export 2017 of the mining sector, p.42”, “5.2.3.2 Production and export mining companies, p.65”, “5.3.3.2 Production and export oil companies, p.71”: <a href="#">here</a> . (last accessed: 22 January 2020).  For oil, see Staatsolie webpage: <a href="#">here</a>	collect and publish volumes and value data on mineral and oil exports on a regular basis.		
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## Requirement 4: Revenue collection

Assessment table: Revenue collection					
Comprehensive disclosure of taxes and revenues (#4.1)					
EITI sub-requirement	Summary of main findings	Source(s) of information	Summary of stakeholder views	Recommendation on compliance with the EITI provisions	Proposed corrective actions and recommendations
In advance of the reporting process, the MSG is required to agree which payments and revenues are material including appropriate	On 29 November 2019, the MSG has agreed on a materiality definition for revenue streams, including a reporting threshold, as well as the options considered and the	2017 EITI Report, “Appendix 2, pp.2-6”: <a href="#">here</a> . (last accessed: 22 January 2020).	See the main text.	Meaningful Progress	See the main text.

<p>materiality definitions and thresholds. (#4.1.a)</p> <p>A description of each revenue stream, related materiality definitions and thresholds should be disclosed. The MSG group should document the options considered and the rationale for establishing the definitions and thresholds.</p>	<p>rationale for the materiality definition.</p> <p>The Report notes that the MSG had decided that all revenue streams representing over 1% of total extractive revenue should be reconciled. Under this criterion, import taxes were not included for example. It appears that the revenue streams excluded from the scope of EITI reporting is marginal and its omission does not materially affect the comprehensiveness of the report. The material revenue streams are described in the Report. The MSG decided to include nine revenue streams.</p>				
<p>The MSG has agreed on a materiality definition for companies, including any reporting thresholds, as well as the options considered and the rationale for the materiality definition. (#4.1.a)</p>	<p>On 29 November 2019, the MSG decided that reconciliation should cover at least 75% of total extractive revenues. It is not clear whether the MSG decided that certain companies should be excluded from the scope of reporting due to the immateriality of their payments.</p>	<p>2017 EITI Report, “4.1.5.1 Flows of payments to the Government, pp.49-50”, “4,3 Companies included, pp.51-52”: <a href="#">here</a>. (Last accessed on 22 January 2020).</p>	<p>See the main text</p>		

The revenue streams considered material are publicly listed and described (#4.1.a)	Yes, the material revenue streams are listed and described in the EITI Report. nine revenue streams were considered material.	2017 EITI Report, “Annex 2, pp.5-7”, <a href="#">here</a> . (Last accessed on 22 January 2020).	See the main text		
The revenue streams listed in provision 4.1.b of the EITI Standard should be included. (#4.1.b).	Yes, the revenue streams listed in provision 4.1.b have been considered. Where the MSG has agreed to exclude certain revenue streams from the scope of EITI disclosures, the rationale for their exclusion is clearly documented.	2017 EITI Report “Annex 2, p.5”: <a href="#">here</a> . (last accessed: 22 January 2020).	See the main text		
The MSG has identified the companies making material payments and whether these companies comprehensively reported all payments in accordance with the materiality definition. (#4.1.c).	The Report considers seven reporting companies. However, there is not evidence that the MSG took a decision based on a materiality definition.	2017 EITI Report, “4.1.5.1 Flows of payments to the Government, pp.49-50”, “4,3 Companies included, pp.51-52”: <a href="#">here</a> . (last accessed: 22 January 2020).	See the main text		
The MSG has identified the government entities receiving material revenues and whether these government entities comprehensively reported	Yes, the Report names one government entity, the MOF, and the material revenues streams that it collects. It reveals that this government entity fully reported all receipts	2017 EITI Report, “4.4 Government bodies included, pp.53-54, p.56”: <a href="#">here</a> . (Last accessed: 22 January 2020).	See the main text		

receipts in accordance with the materiality definition. (#4.1.c).	in accordance with the materiality definition and within the indicated timeframe.				
The government is required to provide aggregate information about the amount of total revenues received from each of the benefit streams agreed in the scope of the EITI Report, including revenues that fall below agreed materiality thresholds. (#4.1.d)	Yes, the government fully reported all revenues, including any revenues below the materiality thresholds. There is a disaggregation by revenue stream.	2017 EITI Report, “Annex 2, 3.2 Reported revenue income 2017, pp.3-4”, “2.3 Government receipts reported in the reconciliation 2017, p.21”: <a href="#">here</a> . (last accessed: 22 January 2020).  MoF Portal: <a href="#">here</a> .	See the main text		
All companies and government entities that pay or receive material revenues submit reporting templates and have fully disclosed all the payments and revenues. (#4.1.b)	Yes, there were not companies or government entities paying or receiving material revenues that have not submitted reporting templates or have not fully disclosed all the payments and revenues.  The report (p. 54) notes that total government revenue from the extractive sector was \$1,8 bn.	-	See the main text		



<p>Implementing countries must provide a comprehensive reconciliation of government revenues and company payments, including payments to and from state-owned enterprises, in accordance with the agreed scope. (#4.1.c)</p>	<p>Reconciliation covered 94% of all extractive revenue (including oil and mining). The reconciliation coverage thus exceeds the target of 75% set by the MSG. Based on the work undertaken by the IA, there is no indication that revenue streams or companies exceeding 1% of total revenue were omitted.</p>	<p>Section 5 'Reconciliation Oil and Mining Sector' of the 2017 EITI Report. p.54: <a href="#">here</a>. (last accessed: 22 January 2020).</p>	<p>See the main text</p>		
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#### In-kind revenues (#4.2)

EITI sub-requirement	Summary of main findings	Source(s) of information	Summary of stakeholder views	Recommendation on compliance with the EITI provisions	Proposed corrective actions and recommendations
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<p>Where the sale of the state's share of production or other revenues collected in kind is material, the government, including state-owned enterprises, are required to disclose the volumes sold and revenues received. (#4.2.a)</p>	<p>While there is no evidence that the MSG has set a definition of materiality with regards to in-kind revenues, the Report discloses in kind-revenues paid by RGM to the SOE, Grassalco. Volumes sold and revenues received were disclosed by Grassalco and the MOF.</p>	<p>2017 EITI Report, "4.1.1. Scope and type of payment transactions, p.46", "5.2.3.1. In-kind flows and sale of state's share of production and financing of mining companies, pp.64-65", "Annex 2, p.6": <a href="#">here</a>. (Last accessed on 22 January 2020).</p>	<p>See the main text</p>	<p>Meaningful progress</p>	<p>See the main text.</p>
<p>The published data must be disaggregated by individual buying company and to levels commensurate with the reporting of other payments and revenue streams. Reporting could also break down disclosures by the type of product, price, market and sale volume. (#4.2)</p>	<p>The Report does not provide disclosures broken down by buying company, individual sale, type of product and price. In practice, there is not a broken-down reporting.</p>	<p>2017 EITI Report, "Annex 2, p.6": <a href="#">here</a>. (Last accessed on 22 January 2020).</p>	<p>See the main text</p>		
<p><i>Where practically feasible, the MSG is encouraged to task the IA with reconciling the</i></p>	<p><i>Yes, the MSG tasked the IA with reconciling the revenues received. Buying companies in the reporting</i></p>	<p>2017 EITI Report, "2.3 Government receipts reported in the reconciliation 2017, p.22, "1 Payment in -kind, p.59":</p>	<p>See the main text</p>		

<p>volumes sold and revenues received by including the buying companies in the reporting process. (#4.2)</p>	<p>process were not included in the reporting process though. Volumes sold were unilaterally disclosed by Grassalco which initiated the sales. There was not disclosure of volumes sold made by the MOF or buying companies.</p>	<p><a href="#">here</a>. (Last accessed on 22 January 2020).</p>			
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#### Infrastructure provisions and barter arrangements (#4.3)

EITI sub-requirement	Summary of main findings	Source(s) of information	Summary of stakeholder views	Recommendation on compliance with the EITI provisions	Proposed corrective actions and recommendations
<p>The MSG and the IA are required to consider whether there are any agreements, or sets of agreements involving the provision of goods and services (including loans, grants and infrastructure works), in full or partial</p>	<p>There is no indication of the existence of infrastructure provisions and barter arrangements in Suriname.</p> <p>This was confirmed in the 2017 EITI Report, therefore this Requirement is not applicable.</p> <p>There is not however an explanation on how EITI</p>	<p>2017 EITI Report, “Compliance with specific EITI Requirement Standard 2016, p.45”: <a href="#">here</a>. (Last accessed on 22 January 2020).</p>	<p>The IA confirmed that they were not aware of any barter and infrastructure transactions in Suriname. There were no other particular stakeholder views on the presence or absence of barter and infrastructure transactions in Suriname.</p>	<p>Not applicable</p>	<p>See the main text.</p>

exchange for oil, gas or mining exploration or production concessions or physical delivery of such commodities. (#4.3)	Report concludes that #4.3 is not applicable.				
Where applicable, revenue flows or value transfers related to infrastructure provisions and barter arrangements should be disclosed. (#4.3)	Revenue flows or value transfers related to infrastructure provisions and barter arrangements were not disclosed as these do not exist in Suriname.	2017 EITI Report, "Compliance with specific EITI Requirement Standard 2016, p.45": <a href="#">here</a> . (Last accessed on 22 January 2020).	See above		

#### Transportation revenues (#4.4)

EITI sub-requirement	Summary of main findings	Source(s) of information	Summary of stakeholder views	Recommendation on compliance with the EITI provisions	Proposed corrective actions and recommendations
Where revenues from the transportation of oil, gas and minerals	There is no indication of the government receiving material revenues from the transportation of	2017 EITI Report, "Compliance with specific EITI	Government representatives confirmed that Staatsolie transported crude oil to the refinery	Not applicable	See the main text.

are material, the government and SOEs are expected to disclose the revenues received. (#4.4)	extractive resources. This was confirmed by the 2017 Report. There is not however an explanation on how EITI Report concludes that #4.4 is not applicable. While the 2018 Staatsolie Report confirms that the Staatsolie provides transportation services as part of contracts with customers when providing oil products, there is no evidence that Staatsolie provided these transportation services in 2017.	Requirement Standard 2016, p.45": <a href="#">here</a> . (Last accessed on 22 January 2020).	with the government subsidizing these payments thus they noted there were not transportation revenues in Suriname under the year of review from Staatsolie to the government of Suriname. There were no other particular stakeholder views on the presence or absence of transport revenues in Suriname.		
Where transportation revenues exist, the MSG should document and explain any barriers to provision of this information or any government plans to overcome these barriers.	Transportation revenues do not exist in Suriname; therefore, the MSG has not documented and explained any barriers to provision of this information or any government plans to overcome these barriers.	2017 EITI Report, "Compliance with specific EITI Requirement Standard 2016, p.45": <a href="#">here</a> . (Last accessed on 22 January 2020).	See above		

#### Transactions between SOEs and government entities (#4.5)

EITI sub-requirement	Summary of main findings	Source(s) of information	Summary of stakeholder views	Recommendation on compliance with the EITI provisions	Proposed corrective actions and recommendations
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<p>The MSG must ensure that the reporting process comprehensively addresses the role of SOEs, including material payments to SOEs from oil, gas and mining companies. (#4.5)</p>	<p>The 2017 EITI Report does not confirm whether mining, oil, and gas companies made any tax or non-tax payments to Staatsolie under the year of review. The 2017 Staatsolie's Annual Report confirms that Staatsolie received cash income from Surgold JV for the 25% interest participation it held in the Merian Gold Mine for an amount of USD46 m which represented 11% of total gross revenues generated by Staatsolie. The report seems to confirm that RGM made material royalty payments in-kind to Grassalco and these payments were reconciled (See <i>Requirement 4.2</i>).</p>	<p>2017 EITI Report "5. RECONCILIATION OIL AND MINING SECTOR, 5.1 General, p.56", "1. Payment in – kind received in 2017, p.59": <a href="#">here</a>. (Last accessed on 22 January 2020).</p> <p>2017 EITI Report, "5.3.3.1 The sale of the state's share of production or other revenues collected in-kind and financing of companies by the Government, pp.71-72": <a href="#">here</a>. (Last accessed on 22 January 2020).</p>	<p>See the main text</p>	<p>Meaningful progress</p>	<p>See the main text.</p>
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<p>The MSG must ensure that the reporting process comprehensively addresses the role of SOEs, including transfers between SOEs and other government agencies. (#4.5)</p>	<p>The Report confirms that Staatsolie made dividend payments to the Government of Suriname. There is no indication of material payments in 2017 from Grassalco to the government. On government transfers to SOEs, the Report confirms that there were financial transfers from the Government of Suriname to Staatsolie including loans, cash calls, and proceeds from petroleum products sales. There is no indication that the government made transfers to Grassalco.</p>	<p>2017 EITI Report “5. RECONCILIATION OIL AND MINING SECTOR, 5.1 General, p.56”, “1. Payment in – kind received in 2017, p.59”: <a href="#">here</a>. (Last accessed on 22 January 2020).</p> <p>2017 EITI Report, “5.3.3.1 The sale of the state’s share of production or other revenues collected in-kind and financing of companies by the Government, pp.71-72”: <a href="#">here</a>. (Last accessed on 22 January 2020).</p>	<p>See in the main text</p>		
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#### Subnational direct payments (#4.6)

EITI sub-requirement	Summary of main findings	Source(s) of information	Summary of stakeholder views	Recommendation on compliance with the EITI provisions	Proposed corrective actions and recommendations
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It is required that the MSG establish whether direct payments, within the scope of the agreed benefit streams, from companies to subnational government entities are material. (#4.6)	There is no indication of the existence of direct subnational payments from companies to subnational government entities. The Report confirm this thus this requirement is not applicable but no basis to conclude this.	2017 EITI Report, "Compliance with specific EITI Requirement Standard 2016, p.45": <a href="#">here</a> . (Last accessed on 22 January 2020).	Government and industry representatives confirmed that there are not subnational direct payments in Suriname.	Not applicable	See the main text.
Where material, the MSG is required to ensure that company payments to subnational government entities and the receipt of these payments are disclosed and reconciled in the EITI Report. (#4.6)	The Report confirms that subnational payments do not exist therefore these revenue flows have not been fully disclosed.	2017 EITI Report, "Compliance with specific EITI Requirement Standard 2016, p.45": <a href="#">here</a> . (Last accessed on 22 January 2020).			

**Disaggregation (#4.7)**

EITI sub-requirement	Summary of main findings	Source(s) of information	Summary of stakeholder views	Recommendation on compliance with the EITI provisions	Proposed corrective actions and recommendations
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It is required that EITI data is presented by individual company, government entity and revenue stream. (#4.7)	Yes, the financial data disclosed is disaggregated by individual company, government entity and revenue stream.	2017 EITI Report: pp.55-56. Pp.70-74 <a href="#">here</a> . (Last accessed on 22 January 2020).	A government representative noted that the two mining companies in Suriname operate a single mine, which mean that these companies de facto are reporting CIT, and royalties on a project-level basis. A few oil companies confirmed that once oil production starts, these companies will pay taxes and royalties per block, according to each PSC.	Satisfactory Progress	See the main text.
Reporting at project level is required, provided that it is consistent with the United States Securities and Exchange Commission SEC rules and the forthcoming EU requirements. (#4.7)	No, the financial data disclosed is not disaggregated by individual project.  There is not a definition project developed by the MSG or other progress in terms of project level reporting.	-	The national secretariat confirmed that there is no definition of project developed by the MSG, and that this topic has not been discussed within the MSG. They however noted that this is a priority for the MSG considering the next fiscal year to report is 2018.		

#### Timeliness (#4.8)

EITI sub-requirement	Summary of main findings	Source(s) of information	Summary of stakeholder views	Recommendation on compliance with the EITI provisions	Proposed corrective actions and recommendations
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<p>Implementing countries are required to produce their first EITI Report within 18 months of being admitted as an EITI candidate. Thereafter, implementing countries are expected to produce EITI Reports on an annual basis. (#4.8.a)</p>	<p>The 2017 EITI Report was published in December 2019 within two years of the end of the accounting period covered.</p> <p>The first EITI Report however was not published within 18 months of being admitted Suriname as an EITI candidate. Suriname was suspended for missing EITI reporting deadline. The suspension was lifted when the 1<sup>st</sup> Report was published.</p>	-	<p>The national secretariat explained that procurement of the IA slowed the process to complete the 1<sup>st</sup> Report. As a result, Suriname was suspended from EITI in February 2019 for failing to publish their 2016 EITI Report by October 2018. In May 2019 the report was published therefore the EITI Board lifted the suspension in June 2019. The IA added that there were some challenges in collecting data from reporting companies and government agencies. However, the 2017 EITI Report was adequately published on time they explained. COVID-19 is slowing the process of elaboration of the 3<sup>rd</sup> EITI Report according to stakeholders consulted.</p>	Satisfactory Progress	See the main text.
<p>Implementing countries must disclose data no older than the second to last complete accounting period. (#4.8.b)</p>	<p>The second EITI Report discloses data no older than the second to last complete accounting period, 2017.</p>	-	See above.		
<p>The MSG has approved the reporting period covered by the EITI Report. (#4.8.c)</p>	<p>There is no evidence that the MSG has approved the reporting period covered by the EITI Report.</p>	-	<p>Any stakeholders expressed any particular views on the reporting period selection.</p>		

Data quality (#4.9)					
EITI sub-requirement	Summary of main findings	Source(s) of information	Summary of stakeholder views	Recommendation on compliance with the EITI provisions	Proposed corrective actions and recommendations
The EITI requires an assessment of whether the payments and revenues are subject to credible, independent audit, applying international auditing standards. (4.9.a)	The IA has made an assessment on whether disclosures are subject to credible, independent audit, applying international auditing standards.	2017 EITI Report, “5.2.3.6. Audited financial statements mining companies, p.73”: <a href="#">here</a> . (Last accessed on 22 January 2020).	The IA explained that quality assurances procedures for EITI reporting had been designed on the basis of the request of audited financial statements for companies. The IA explained that the MOF accounts were not audited.	Meaningful Progress	See the main text.
It is required a reconciliation to be undertaken by a credible, IA, applying international auditing standards. There is the administrator’s opinion regarding reconciliation including discrepancies. (4.9.b.i)	Yes, reconciliation has been undertaken by a credible, IA, applying international auditing standards. There is the administrator’s opinion regarding reconciliation including discrepancies.  The IA expressly confirmed that procedures were not designed to constitute an audit made in accordance with international auditing standards.	2017 EITI Report, “Report of the Independent Administrator – Letter, p.11”: <a href="#">here</a> . (Last accessed on 22 January 2020).	Stakeholders across constituencies considered the data in the 2017 EITI Report reliable. For companies, the IA noted that BDO is not able to guarantee data quality, and it is limited to confirm that assurance procedures established in advanced by the MSG were followed. For the MOF, the IA noted that BDO is not able to guarantee data quality of the MOF. Moreover, the IA highlighted that MOF’s accounted are not audited.		

<p>The IA must be perceived by the MSG to be credible, trustworthy and technically competent. The MSG should endorse the appointment of the IA. (4.9.b.ii)</p>	<p>Yes, the IA is perceived by the MSG to be credible, trustworthy and technically competent. From January to March 2018, the MSG discussed on the appointment of the IA and endorsed it.</p>	<p>Meeting Minute 1-2018 (12 January 2018); Meeting Minute 2-2018 (26 January 2018); Meeting Minute -3-2018 (12 February 2018); Meeting Minute 4-2018 (19 March 2018); and Meeting Minute 5-2018 (6 April 2018). MSG Minutes are not publicly available, but they can be requested to the IS or NS.</p>	<p>Stakeholders across constituencies considered the IA professional and credible.</p>		<p>See the main text.</p>
<p>The MSG and the IA are required to agree a Terms of Reference for the EITI Report based on the standard Terms of Reference and the 'agreed upon procedure for EITI Reports' endorsed by the EITI Board. (4.9.b.iii)</p>	<p>Yes, the Terms of Reference for the EITI Report agreed between the MSG and the IA is based on the standard Terms of Reference and the 'agreed upon procedure for EITI Reports' endorsed by the EITI Board.</p> <p>Nontrivial deviations from the ToRs agreed for the IA, compared to the standard ToRs approved by the EITI Board have been raised. There were not material deviations from the agreed ToRs in practice identified.</p>	<p>2017 EITI Report, "Appendix 1": <a href="#">here</a>. (Last accessed on 22 January 2020).</p> <p>Meeting Minute 10-2019 (31 May 2019)</p> <p>Meeting Minute 11-2019 (28 June 2019)</p>	<p>The NS and stakeholders consulted confirmed that EITI-SR hired BDO considering their satisfaction with the work's firm with the 2016 EITI Report.</p>		<p>See the main text.</p>
<p>The Report should confirm assurances to be provided</p>	<p>The Report confirms that the MSG has agreed on the</p>	<p>2017 EITI Report, "7. Methodology, Approach and</p>	<p>The IA noted that while no assurances were provided by the</p>		

by the participating companies and government entities to assure the credibility of the data (IA ToRs)	assurances to be provided by the participating companies to assure the credibility of the data. As part of the assurance environment applicable to mining and oil companies, companies were required to provide a copy of audited financial statements. Quality assurances for government entities are not clear.	Scope”, p.86-88, «Status of recommendations from FY 2016 EITI Report”, p.69, p.73 p.79: <a href="#">here</a> . (Last accessed on 22 January 2020).	MOF. The IA confirmed that the MOF was not audited in 2017.		See the main text.
The MSG has agreed on reporting templates (IA ToRs)	Through MSG Meeting Minutes 1 and 2, the MSG seems to have discussed and agreed on reporting templates with the IA. The Report confirms that reporting templates are uploaded to a portal for data collection purposes.	2017 EITI Report: <a href="#">here</a> . (Last accessed on 22 January 2020). MSG Meeting Minute 1-2019 (11 January 2019) MSG Meeting Minute 2-2019 (25 January 2019)	The IA confirmed that reporting templates were agreed with the MSG.		
The MSG has agreed on appropriate provisions for safeguarding confidential information (IA ToRs)	There is no evidence that the MSG has agreed on appropriate provisions for safeguarding confidential information.	-	Reporting entities were satisfied that the IA respected data confidentiality.		
The Report should confirm whether all reporting	While all reporting companies provided their financial	2017 EITI Report, “5.4 An overview of reporting companies	The IA noted that no assurances were provided by the MOF. In terms		

<p>companies and government entities provide assurances to assure the credibility of the data (#4.9.a and IA ToRs)</p>	<p>statements, most of these financial statements were unqualified. The Report also highlights that the group of 15 companies within the SHMR do not provided financial statements.</p> <p>For government agencies, it seems the MOF did not provide assurances on the revenue streams reported.</p>	<p>provided their annual statements and their accounting principles, p.74”, “Status of recommendations from FY 2016 EITI Report, p.83”: <a href="#">here</a>. (Last accessed on 22 January 2020).</p>	<p>of companies’ audit and assurance practices, industry representatives confirmed that copies of financial statements were shared with the IA, and the IA reconfirmed that.</p>		
<p>The Report contains a summary of the key findings from the assessment of the reliability of the data disclosed by companies and government entities has been disclosed (IA ToRs).</p>	<p>While there is not a summary of these, the Independent Administration had mention where companies/government entities did not provide reliable information.</p> <p>The IA said that if there are material receipts or payments omitted, or not reflected due to the nature of a transaction in relation with EITI, in the reporting templates, by both the paying in receiving entities, the work carried out by the IA would not be sufficient to detect them.</p>	<p>2017 EITI Report p.12: <a href="#">here</a>. (Last accessed on 22 January 2020).</p>	<p>The IA confirmed that while they consider that material payments and revenues are effectively covered by the 2017 EITI Report, they are not able to provide assurance about the reliability of the data considering the limitations of their assignment. The IA noted that their analysis relied heavily on the explanations provided by reporting entities.</p>		



All non-financial (contextual) information is clearly sourced (IA ToRs).	No, not all non-financial (contextual) information is clearly sourced. There are some references to government websites without any links.	2017 EITI Report: <a href="#">here</a> . (Last accessed on 22 January 2020).	The IA confirmed that substantial data provided by government entities are not publicly available, thus the report covers disclosures gaps in many instances. All consulted stakeholders considered the EITI Report as a unique and independent source of data.		
	EITI Report includes an overview of follow-up on past recommendations and a set of recommendations based on the 2017 EITI reporting.	Yes, the EITI Report includes an overview of follow-up on past recommendations and a set of recommendations based on the 2017 EITI reporting.	2017 EITI Report: pp.75-85: <a href="#">here</a> . (Last accessed on 22 January 2020).	Stakeholders did not express any particular views on recommendations provided by the IA in the 2017 and 2016 EITI Reports.	See the main text.

## Requirement 5: Revenue allocations

Assessment table: Revenue management and distribution					
Distribution of revenues (#5.1)					
EITI sub-requirement	Summary of main findings	Source(s) of information	Summary of stakeholder views	Recommendations on compliance	Proposed corrective actions and recommendations

				with the EITI provisions	
<p>Implementing countries should indicate which extractive industry revenues, whether cash or in kind, are recorded in the national budget.</p> <p>Where revenues are not recorded in the national budget, the allocation of these revenues must be explained, with links provided to relevant financial reports as applicable (#5.1.a)</p>	<p>Yes, the EITI Report indicates which extractive industry revenues are recorded in the national budget (p.31). The IA however highlights a challenge related an extractive industry revenue in-kind which is not reflected in the national budget made by RGM towards Grassalco. (p.80).</p> <p>While the Report recognized that there is an in-kind revenue not recorded in the budget, and the allocation of these revenues has been broadly explained, there are not links provided to relevant financial reports.</p>	<p>2017 EITI Report, “2.3 Government receipts reported in the reconciliation 2017, p.21”, “6.2 Status of recommendations of fiscal year report 2016, p.76”: <a href="#">here</a>. (Last accessed on 22 January 2020).</p> <p>While not a directly link to the Annual Budget 2017, the Report provides a link to a government website (MOF) where the budget 2017 is publicly available: <a href="#">here</a>.</p>	See the main text.	Satisfactory Progress	See the main text.
<p><i>MSGs are encouraged to reference national revenue classification systems, and international standards such as the IMF Government Finance Statistics Manual. (5.1.b).</i></p>	<p><i>The MSG has referenced the GFS method as the national revenue classification systems to report revenues.</i></p>	<p>2017 EITI Report, “3.5.2 Compliance with specific EITI requirements Standard 2016, p.44”: <a href="#">here</a>. (Last accessed on 22 January 2020).</p>	See the main text.		

Subnational transfers (#5.2)					
EITI sub-requirement	Summary of main findings	Source(s) of information	Summary of stakeholder views	Recommendation on compliance with the EITI provisions	Proposed corrective actions and recommendations
Where transfers between national and subnational government entities are related to revenues generated by the extractive industries and are mandated by a national constitution, statute or other revenue sharing mechanism, the MSG is required to ensure that material transfers are disclosed. (#5.2.a)	There is no indication that subnational transfers exist in Suriname. The Report does not confirm whether there are mandatory sub-national transfers under Suriname's legislation.	2017 EITI Report: <a href="#">here</a> . (Last accessed on 22 January 2020).	<p>The IA and a government representative confirmed the lack of transfers of extractive industry revenues between national and subnational government entities.</p> <p>Stakeholders from other constituencies did not express any other views on the presence or absence of sub-national transfers.</p>	Not applicable	See the main text.
<i>The MSG is encouraged to ensure that any material discretionary or ad hoc transfers are also disclosed and where possible reconciled. (#5.2.b).</i>	<i>No, the MSG has not included any material discretionary or ad-hoc subnational transfers in the EITI reporting process.</i>		Stakeholders did not express any other views on the presence or absence of discretionary or ad-hoc sub-national transfers.		

Additional information on revenue management and expenditures (#5.3)					
EITI sub-requirement	Summary of main findings	Source(s) of information	Summary of stakeholder views	Recommendation on compliance with the EITI provisions	Proposed corrective actions and recommendations
<i>A description of any extractive revenues earmarked for specific programmes or geographic regions. (#5.3.a)</i>	<i>There is no indication that any extractive revenues in Suriname are earmarked for specific programmes or geographic regions. The Report confirms the inexistence of these in Suriname, therefore this requirement is not applicable. p.32</i>	2017 EITI Report, “3.3 Government income streams extractive industry, p.32”: <a href="#">here</a> . (Last accessed on 22 January 2020).	Stakeholders did not express any view on issues addressed by Requirement 5.3.	-	See the main text.
<i>A description of the country’s budget and audit processes and links to the publicly available information on budgeting, expenditures and audit reports should be disclosed (#5.3.b)</i>	<i>There is a limited description of the country’s budget and audit processes. There are not links to publicly available information about budgeting and expenditures.</i>	2017 EITI Report, “6.2 Status of recommendations of fiscal year report 2016, p.80”: <a href="#">here</a> . (Last accessed on 22 January 2020).	Same as above.		
<i>Timely information from the government that will further public understanding and debate around issues of revenue sustainability and resource</i>	<i>No, the report does not discuss issues of revenue management or commodity forecast potentially impacting on extractive sector revenue in the future.</i>	-	Some CSOs representatives expressed interest in understanding and debate about the use of extractive revenues.		

<i>dependence should be disclosed. (#5.3.c)</i>					
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## Requirement 6: Social and economic spending

Assessment table: Social and economic spending					
Social expenditures (#6.1)					
EITI sub-requirement	Summary of main findings	Source(s) of information	Summary of stakeholder views	Recommendation on compliance with the EITI provisions	Proposed corrective actions and recommendations
Where material social expenditures by companies are mandated by law or the contract with the government that governs the extractive investment, implementing countries must disclose and, where possible, reconcile these transactions. (#6.1.a)	There is no evidence of a MSG agreement on a definition of materiality with regards to mandatory social expenditures. While the Report lists a few social expenditures, it is not clear which expenditures were material and discretionary. The Report provides social expenditures corresponding to two material companies (RGM and Newmont). It also confirms there were not social expenditures reported by Grassalco. For oil, mandatory and voluntary social expenditures without clear distinction were disclosed by three IOCs and Staatsolie.	2017 EITI Report, “5.2.3.4 Social expenditure, p.68”, “5.3.3.4 Social expenditure, p.73”: here. (Last accessed on 22 January 2020).	See the main text.	Inadequate progress	See the main text.

<p>Where the beneficiary of the mandated social expenditure is a third party, i.e. not a government agency, it is required that the name and function of the beneficiary be disclosed. Where reconciliation is not feasible, countries should provide unilateral company and/or government disclosures of these transactions. (#6.1.a)</p>	<p>For mining, only for RGM, disclosures of social expenditures have been disaggregated by payment type between cash and in-kind expenditures. Only for the in-kind expenditure, there is the identification of the non-government beneficiary. For Newmont, disclosures of social expenditures have been disaggregated by value. There is however a general reference to what type of expenditures were “reported” by these companies. There is no disclosure of non-government beneficiaries. The Report provides voluntary social expenditures reported by SHMR. For oil, while there is disclosure of the value of social expenditures reported by company, there is not disaggregation by payment type between cash and in-kind expenditures.</p>	<p>2017 EITI Report, “5.2.3.4 Social expenditure, p.68”, “5.3.3.4 Social expenditure, p.73”: <a href="#">here</a>. (Last accessed on 22 January 2020).</p>	<p>See the main text.</p>		
<p>Where the MSG agrees that discretionary social expenditures and transfers are material, the MSG is encouraged to develop a reporting process with a view to achieving transparency commensurate with the disclosure of other payments and revenue</p>	<p>There is no evidence that the MSG agreed that there exist discretionary social expenditures and transfers, and that these are material.</p>	<p>-</p>	<p>See the main text.</p>		

streams to government entities. (#6.1.b)					
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SOE quasi fiscal expenditures (#6.2)					
EITI sub-requirement	Summary of main findings	Source(s) of information	Summary of stakeholder views	Recommendation on compliance with the EITI provisions	Proposed corrective actions and recommendations
Where state participation in the extractive industries gives rise to material revenue payments, implementing countries must include disclosures from SOE(s) on their quasi-fiscal expenditures.	The Report does not include disclosures from SOEs on their quasi-fiscal expenditures.	-	See the main text.	No progress	See the main text.
Where quasi-fiscal expenditures exist and are material, the MSG has developed a reporting process for disclosure of quasi-fiscal expenditures and these expenditures have been disclosed accordingly (6.2)	There is no indication that quasi-fiscal expenditures exist.	-	See the main text.		



Contribution of the extractive sector to the economy (#6.3)					
EITI sub-requirement	Summary of main findings	Source(s) of information	Summary of stakeholder views	Recommendation on compliance with the EITI provisions	Proposed corrective actions and recommendations
The size of the extractive industries in absolute terms and as a percentage of GDP as well as an estimate of informal sector activity, including but not necessarily limited to artisanal and small-scale mining, must include. (#6.3.a)	<p>Information about the contribution of the extractive industries to GDP for 2017 covered by EITI disclosures has been disclosed in absolute and relative terms.</p> <p>GDP data is also available broken down for mining and quarrying in the Central Bank portal.</p>	<p>2017 EITI Report, “2.3 Government receipts reported in the reconciliation 2017, p.20”: <a href="#">here</a>. (Last accessed on 22 January 2020).</p> <p>Central Bank Portal: <a href="#">here</a>. (Last accessed on 22 January 2020).</p>	CSOs suggested for the EITI Report to cover ASM activities considering its importance for the Suriname economy.	Meaningful progress	See the main text.
Total government revenues generated by the extractive industries (including taxes, royalties, bonuses, fees, and other payments) in absolute terms and as a percentage of total government revenues must be included. (#6.3.b)	Yes, information about the contribution of the extractive industries to government revenues for 2017 by EITI disclosures has been disclosed in absolute and relative terms.	2017 EITI Report, “2.3 Government receipts reported in the reconciliation 2017, p.20”: <a href="#">here</a> . (Last accessed on 22 January 2020).	Stakeholders did not express any particular views on disclosures related to government revenues.		

Exports from the extractive industries in absolute terms and as a percentage of total exports must be disclosed. (#6.3.c)	Yes, information about the contribution of the extractive industries to exports for 2017 has been disclosed in absolute and relative terms.	2017 EITI Report, “3.4.3 Overall view of export 2017 of the mining sector, p,43”: <a href="#">here</a> . (Last accessed on 22 January 2020).  While the Report does not provide a publicly available link, the source mentioned is Central Bank: Trade balance 2017. The ABS Export data has been mentioned as a source: <a href="#">here</a> .	Some stakeholders shared their concern related to oil export figures included in the Report in contrast with official sources such as the 2017 Staatsolie Annual Report.		
Employment in the extractive industries in absolute terms and as a percentage of the total employment must be disclosed. (#6.3.d)	Information about the contribution of the extractive industries to employment for 2017 covered by EITI disclosures has not been disclosed either in absolute or relative terms. Employment data by reporting large-scale mining and oil companies however have been disclosed in absolute terms but not as a percentage to total employment.	2017 EITI Report, “5.2.3.5 Employment data mining, p.68”, “5.3.3.5, Employment data oil industry, p.73”: <a href="#">here</a> . (Last accessed on 22 January 2020).	Representatives from the Central Bank considered that the employment data available today for the mining and oil sectors is not comprehensive and needs to be timelier.		
Key regions/areas where production is concentrated	Information about the location of extractive activities (where	2017 EITI Report, “Figure 3.2 Map-Mineral sources	Stakeholders did not express any particular views on		

must to be disclosed. (#6.3.e)	production is concentrated) in 2017 covered by EITI disclosures has been disclosed. For mining, areas of interest of the two large gold mining companies (RGM, and NS) have been disclosed (p.33). A map-mineral sources in Suriname has been disclosed, p.26. For oil, an overview of identified onshore, nearshore and offshore exploration and exploitation blocks at the end of 2017 has been disclosed, (p.28).	in Suriname (source GMD), p.25”, and “Figure 3.3 Overview of the identified onshore, nearshore and offshore exploration and exploitation blocks at year end 2017, p.27”: <a href="#">here</a> . (Last accessed on 22 January 2020).	disclosures related to key regions or areas where production is concentrated.		
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## Requirement 7: Outcomes and impact of implementation

Assessment table: Outcomes and impact					
Public debate (#7.1)					
EITI sub-requirement	Summary of main findings	Source(s) of information	Summary of stakeholder views	Recommendation on compliance with the EITI provisions	Proposed corrective actions and recommendations
The MSG must ensure that the EITI Report is comprehensible, actively	The EITI Report is comprehensible and publicly accessible.	2016 EITI Report, <a href="#">here</a> . (Last accessed on 4 December 2020)	Stakeholders have indicated that data has not been relevant from a political perspective, and that it	Meaningful progress	See the main text.

<p>promoted, publicly accessible and contributes to public debate. (#7.1)</p>	<p>There is some evidence of the EITI Report being actively promoted.</p>	<p>Media coverage of launching of first report in May 2016:  <a href="https://www.shoeket.com/nieuwsbericht/32603/">https://www.shoeket.com/nieuwsbericht/32603/</a>          (last accessed on 4 December 2020)</p> <p>2017 EITI Report: <a href="#">here</a>.          (Last accessed on 22 January 2020).</p> <p>Media coverage of launching of second report in January 2020, <a href="#">here</a>, <a href="#">here</a>, <a href="#">here</a> and <a href="#">here</a>.          (Last accessed on 4 December 2020)</p>	<p>should be publicized more widely, Nonetheless, some government stakeholders have signalled the usefulness of having more detailed data on the extractive sector which has been translated into helpful input for planning and programs within certain agencies.</p>		
<p>The MSG is required to produce paper copies of the EITI Report and ensure that they are widely distributed. Where the report contains extensive data, e.g. voluminous files, the MSG is encouraged to make this available online. (#7.1.a)</p>	<p>The MSG produced paper copies of the EITI Reports but there is no evidence of these been widely distributed, beyond the online publication in the EITI-SR portal.</p>	<p>2016 EITI Report, <a href="#">here</a>.          (Last accessed on 4 December 2020)</p> <p>2017 EITI Report, <a href="#">here</a>          (Last accessed on 4 December 2020)</p> <p>EITI-SR fact sheet, <a href="#">here</a>          (Last accessed on 4 December 2020)</p>	<p>See main text.</p>		

<p>The MSG should agree a clear policy on the access, release and re-use of EITI data. Implementing countries are encouraged to publish EITI data under an open license, and to make users aware that information can be reused without prior consent.</p>	<p>There is not an open data policy publicly available with regards to the information published by EITI-SR. There is no evidence that EITI-SR raise awareness to the users regarding the possibility of reusing the EITI data,</p>	<p>2016 EITI Report, <a href="#">here</a>. (last accessed on 4 December 2020)</p> <p>2017 EITI Report, <a href="#">here</a> (Last accessed on 4 December 2020)</p>	<p>Stakeholders seemed to be satisfied with the ways of releasing the reports through the EITI-SR portal, but many of them raised the issue of timeliness, explaining that the reports are published so long after the fact that encouraging the use of that information is harder.</p>		
<p>The MSG should make the EITI Report available in an open data format (xlsx or csv) online and publicize its availability.</p>	<p>Both EITI Reports have been published online (EITI-SR web portal) in pdf format. Even though this does not qualify as open data, the documents can still be easily downloaded by the public.</p>	<p>2016 EITI Report, <a href="#">here</a>. (Last accessed on 4 December 2020)</p> <p>Media coverage of launching of first report in May 2016, <a href="#">here</a>. (Last accessed on 4 December 2020)</p> <p>2017 EITI Report, <a href="#">here</a> (Last accessed on 4 December 2020)</p> <p>Media coverage of launching of second report in January 2020: <a href="#">here</a>, <a href="#">here</a>, <a href="#">here</a>, <a href="#">here</a> and <a href="#">here</a> (Last accessed on 4 December 2020)</p>	<p>See main text.</p>		

		EITI-SR fact sheet <a href="#">here</a> . (Last accessed on 4 December 2020)			
The MSG must ensure that the EITI Report is comprehensible, including by ensuring that it is written in a clear, accessible style and in appropriate languages.	The EITI Report is accessible to the public, but given its length and its technicalities, it is not as easy to comprehend. The 2017 Report was published in English, while the 2016 report was also published in Dutch. There have been no translations to the local languages.	2017 EITI Report, <a href="#">here</a> . (Last accessed on 4 December 2020)	Several stakeholders signalled that the EITI language is very technical and not simple to communicate. They also referred to the need for better efforts in communicating with people in the hinterland.		
The MSG must ensure that outreach events, whether organized by government, civil society or companies, are undertaken to spread awareness of and facilitate dialogue about the EITI Report across the country.	There is some evidence of outreach events related to the launching of each report (press conferences). There have been some media coverage on the starting of validation.  The NS hired a media company (Omedia) to support them with their communications efforts, but they carried out few specific activities with limited outreach.	Media coverage of launching of first report in May 2016 <a href="#">here</a> (Last accessed on 4 December 2020)  Media coverage of launching of second report in January 2020 <a href="#">here</a> ; <a href="#">here</a> ; and <a href="#">here</a> (Last accessed on 4 December 2020)  Media coverage on the beginning of validation, <a href="#">here</a> , and <a href="#">here</a> . (Last accessed on 4 December 2020). Social media	During consultations there was a recurring topic about not being sufficient awareness on the EITI in Suriname. The difficulties with communications have been raised several times, regarding the geographic challenges and also in terms of the EITI language as being very technical and hard to explain.		

		accounts from EITI-SR, <a href="#">here</a> , and <a href="#">here</a> .			
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Data accessibility (#7.2)					
EITI sub-requirement	Summary of main findings	Source(s) of information	Summary of stakeholder views	Recommendation on compliance with the EITI provisions	Proposed corrective actions and recommendations
The MSG is encouraged to make EITI Reports machine readable, and to code or tag EITI Reports and data files so that the information can be compared with other publicly available data by adopting Board-approved EITI data standards. (#7.2.a)	The Report has been published in a PDF format. Therefore, information cannot be compared with other publicly available data.	2016 EITI Report, <a href="#">here</a> . (Last accessed on 4 December 2020)  2017 EITI Report, <a href="#">here</a> . (Last accessed on 4 December 2020)	No particular comments were provided by stakeholders on this matter.	-	See the main text.
The MSG is encouraged to produce brief summary reports, with clear and balanced analysis of the information, ensuring that the authorship of different elements of the EITI	There is no evidence of the existence of English summary reports related to neither of the reports. The EITI Report 2016 had a summary but only in Dutch. The English version of the EITI-SR website contains certain key	2016 EITI Report, <a href="#">here</a> . (Last accessed on 4 December 2020)  2017 EITI Report, <a href="#">here</a> . (Last accessed on 4 December 2020)	Some stakeholders said that the data presented in its current format is very hard to understand and communicate to a broader audience.		



Report is clearly stated. (#7.2.a)	information on the side tabs, that can be consulted directly				
The MSG is encouraged to summarise and compare the share of each revenue stream to the total amount of revenue that accrues to each respective level of government. (#7.2.b)	The MSG produced a summary data file for fiscal year 2017, which was submitted on 30 April 2020 and finalized on 30 July 2020, after addressing some comments from the International Secretariat.	2017 SDT, <a href="#">here</a> . (last accessed on 06 December 2020)	-		
Where legally and technically feasible, consider automated online disclosure of extractive revenues and payments by governments and companies on a continuous basis. (#7.2.c)	There are some sporadic online disclosures, but they happen on a very random basis, and not at all systematically.	-	Stakeholders agree that there is still a lot of progress to be done before being able to systematically disclose the EITI data in Suriname. This is related mostly with technological barriers and challenges in terms of data collection.		
The MSG is encouraged to undertake capacity-building efforts, especially with civil society organisations, to increase awareness of the process, improve understanding of the information and data	There is almost no evidence of capacity-building efforts directed at CSOs or other organisations more broadly.	Policy monitoring reports from the Citizens Initiative for Participation and Good Governance (2017-2019), <a href="#">here</a> .  (Last accessed on 04 December 2020);	Some CSOs indicated having used the report as a tool to provide better understanding of the extractive sector and inform their wider discussions.		

from the reports, and encourage use of the information by citizens, the media, and others. (#7.2.d)		and from Projekta, <a href="#">here</a> .  (Last accessed on 04 December 2020)			
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### Recommendations from EITI implementation (#7.3)

EITI sub-requirement	Summary of main findings	Source(s) of information	Summary of stakeholder views	Recommendation on compliance with the EITI provisions	Proposed corrective actions and recommendations
The MSG is required to take steps to act upon lessons learnt; to identify, investigate and address the causes of any discrepancies; and to consider the recommendations resulting from EITI reporting.	The 2017 Report provides a status of the steps taken by the MSG to address the IA recommendations from the EITI Report 2016.	2019-2020 work plan, 'Objective 5 – prepare, complete and submit the 2 <sup>nd</sup> EITI-SR Report covering 2017', <a href="#">here</a> . (Last accessed 07 December 2020).  '6.2 Status of recommendations of fiscal year report 2016' pp.75-84, <a href="#">here</a> . (Last accessed on 4 December 2020)  MSG Meeting Minute 12-2019 (28 June 2019).  Request for Expressions of Interest for Consulting Services on Legal Assessment of the Institutional Framework for BO in Suriname and Advice on Next Steps, from December 2019, <a href="#">here</a> . The NS has shared with the IS via email the resulting document	Stakeholders highlighted the difficulties they had for following up on concrete recommendations given the short period of time there was between the publication of the 2016 and the 2017 Reports. The follow-up on the BO road map was mentioned as a relevant point. The MSG, together with the support of a consultancy, analysed the legislation, identified the needs for amendments in the regulation and have recently publish a brief report on next steps.	Meaningful progress	See the main text.

		from the consultancy, but this has not been published yet.			
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Outcomes and impact of EITI implementation (#7.4)					
EITI sub-requirement	Summary of main findings	Source(s) of information	Summary of stakeholder views	Recommendation on compliance with the EITI provisions	Proposed corrective actions and recommendations
The MSG has made efforts to review outcomes and impact of EITI implementation on natural resource governance in annual activity reports (7.4.a.i)	The MSG has produced two Annual Progress Reports (APR), for the fiscal years 2017 and 2018. Besides the APRs, there are no other documents on outcomes and impact of EITI.	2017 EITI Report <a href="#">here</a> . (Last accessed on 10 March 2020)  APR 2018 <a href="#">here</a> . (Last accessed on 07 December 2020)	During consultations the stakeholders confirmed that they have done very limited work on reviewing the impact and outcomes of EITI implementation in Suriname, due to constraint capacities.	Inadequate progress	See the main text.
The APR include a summary of EITI activities undertaken in the previous year.	The 2018 APR includes a detailed list of activities carried out during that year, noting the level of completeness reached in each of them.	APR 2018 <a href="#">here</a> . (Last accessed on 07 December 2020)			
The APR include an assessment of progress with meeting and maintaining compliance with each EITI	Sections 3 and 5 of the 2018 APR provide an assessment of performance against EITI requirements, referencing the	APR 2018 <a href="#">here</a> . (Last accessed on 07 December 2020)	Stakeholders highlighted capacity constraints and the lack of funding for the NS as the main concerns. This falls in line with the		

Requirement, and any steps taken to exceed the requirements.	specific strengths or weaknesses identified.		weakness identified in the APR of 2018, regarding the delays in the approval and operationalization of the EGPS Grant.		
The APR include an overview of the MSG responses to and progress made in addressing the recommendations from reconciliation and Validation in accordance with Requirement 7.3. (7.4.a.ii)	The 2018 APR does not include an overview of the MSG progress made in addressing the recommendations from the first EITI Report 2016. Nonetheless, the 2017 EITI Report, does include a brief overview on this matter.	2017 EITI Report <a href="#">here</a> . (Last accessed on 10 March 2020)  APR 2018 <a href="#">here</a> . (Last accessed on 07 December 2020)			
The APR include an assessment of progress with achieving the objectives set out in its work plan (Requirement 1.5), including the impact and outcomes of the stated objectives. (7.4.a.iv)	The 2018 APR considered the previous 2017-2018 activities. These objectives have been updated in the new 2019-2020 work plan, and so far, there has been no document providing an assessment of progress regarding them.	APR 2018 <a href="#">here</a> . (Last accessed on 07 December 2020)			
The APR include a narrative account of efforts to strengthen the impact of EITI implementation on	Section 5 of the APR includes a description of strengths and weaknesses identified in the EITI process.	APR 2018 <a href="#">here</a> . (Last accessed on 07 December 2020)			

natural resource governance, including any actions to extend the detail and scope of EITI reporting or to increase engagement with stakeholders. (7.4.a.v)		2019-2020 work plan <a href="#">here</a> . (Last accessed on 07 December 2020)			
The APR includes an evaluation of the implementation of the beneficial ownership roadmap. (7.4.a.vi)	The 2018 APR provides very limited information on the Beneficial Ownership roadmap.	APR 2018 <a href="#">here</a> . (Last accessed on 07 December 2020)	Stakeholders have highlighted BO transparency as an issue very relevant in the MSG agenda. They are aware that there is considerable additional work that is needed on this matter.		
All stakeholders should be able to participate in the production of the APR and reviewing the impact of EITI implementation. Civil society groups and industry involved in the EITI, particularly, but not only those serving on the MSG, should be able to provide feedback on the EITI process and have their views reflected in the APR. (7.4.b)	There is no indication that all stakeholders, whether from the MSG or beyond, have been able to participate in the production of the 2018 APR.	APR 2018, <a href="#">here</a> . (Last accessed on 07 December 2020)	Stakeholders emphasized their capacity constraints for engaging in the impact review of the EITI in Suriname.		