



**Open Government Partnership
Independent Reporting Mechanism (IRM)**

**United Kingdom
Public Comments to the First Progress Report**

1. Beneficial ownership

Commitment Text: We will establish a public register of company beneficial ownership information for foreign companies who already own or buy property in the UK, or who bid on UK central government contracts.

Objective: The proposed beneficial ownership register will bring greater transparency to who bids on public contracts and owns or buys UK property.

Status quo: We currently do not collect or publish this information.

Ambition: From 6 April 2016, all UK companies are required to hold a register of People with Significant Control (PSC) and from 30 June 2016 UK companies will start providing PSC information to the Companies House public register. The UK is a founding country of the initiative for the automatic exchange of beneficial ownership information. This commitment will require foreign companies who own or buy property in the UK, or bid on central government public contracts, to identify and register their beneficial owners.

Milestones:

1. The intention is to consult by the end of the year
2. Introduce primary legislation in the third parliamentary session

Responsible institution: Department for Business, Innovation and Skills (now Department for Business, Energy and industrial Strategy)

Supporting institutions: Cabinet Office, mySociety, Natural Resource Governance Institute, ONE, Publish What You Pay UK, The Open Data Institute, Transparency International UK

Start date: May 2016

End date: April 2018

Commitment Overview	Specificity				OGP Value Relevance				Potential Impact				On Time?	Completion			
	None	Low	Medium	High	Access to Information	Civic Participation	Public Accountability	Tech. and Innov. for Transparency and Accountability	None	Minor	Moderate	Transformative		Not Started	Limited	Substantial	Complete
1. Overall			✓		✓	✓					001		No		✓		
1.1. Consultation			✓		✓	✓				✓			No				✓
1.2. Primary legislation			✓		✓					✓			No	✓			

Context and Objectives

This commitment builds on the previous action plan's push towards beneficial ownership transparency.¹ The commitment from the second action plan involved publishing details of beneficial ownership of UK registered business owners via the Person with Significant Control register, and was one of the central commitments of

#001

Posted by **Rachel Davies Teka** on **04/20/2018** at **11:49am**

Agree: 0, Disagree: 0

I would challenge that the overall impact is only moderate. I think the impact will be higher than that if this is implemented well. A lack of transparency in this area is one of the main reasons that corrupt and criminal wealth can be hidden so easily in the UK property market.

the second plan.² The opening up of business ownership was designed to prevent corruption and money laundering.

The new commitment aims to extend the principle of beneficial ownership further to 'bring greater transparency to who bids on public contracts and owns or buys UK property'. This stemmed from government and CSO concerns that London is being used to invest illicit money from overseas.

In 2017, the government estimated that 'between 2004 and 2014, over £180m worth of property in the UK has been investigated as suspected proceeds of corruption'.³ In the same year, Transparency International reported 'over £4.2 billion worth of properties bought by politicians and public officials with suspicious wealth in London' and argued that 'this could be the tip of iceberg'.⁴ In July 2015, then Prime Minister David Cameron vowed to expose the use of "anonymous shell companies" to buy luxury properties in the UK.⁵ He argued that such movement of money was 'a cancer which is at the heart of so many of the world's problems'.⁶

The commitment followed from the ongoing publication of beneficial ownership data from the second plan. As of June 2016, Companies House had begun publishing the previous commitment's data, known as the Person with Significant Control register, although not all the information was completed by then, and it took until June 2017 to complete, as companies filed their data over the course of that year.⁷ The first tranche of data was published in July 2016.⁸ The Open Corporates team, who make innovations in corporate data and lobby for greater corporate openness, called it a 'significant step forward' and though there were 'significant data quality problems' it felt that 'many of them are teething problems, which can be solved fairly easily'.⁹

The commitment's activities are objectively verifiable; however, the commitment's design lacks a way to indicate how the proposed activities contribute to the aim of the ambition of the commitment. For example, it is not clear as to who would be consulted if the legislation is necessary to collect and publish the data and what concrete changes the legislation aims to make. Finally, the aim of the commitment suggests that it will focus on broadening the existing registry, whereas the activities themselves propose a consultation to develop the legislation.

The commitment could potentially make transparent illegal money or 'shell' (hidden) operations beyond the UK-based companies in the existing registry. While the individual milestones are positive first steps towards expanding transparency in beneficial ownership, the commitment as a whole, if fully implemented, would be a significant improvement. Even though the approval and implementation of the new legislation is not part of this commitment, it would help prevent illicit investment to take place.

Completion

The government has made progress on milestone 1, but CSOs were concerned about the lack of progress on milestone 2.

In March 2016, just before the beginning of the third action plan cycle, the government published a discussion paper looking for views on how to enhance the transparency of beneficial ownership information for overseas companies investing in UK property. It received 38 responses from 'law firms, trade associations and representative bodies, estate agents, civil society and transparency campaigners, government and individuals'.¹⁰ The government argued that the 'responses have confirmed the need to create this register and allowed us to develop the proposals further'.¹¹

The first milestone was completed two months after the March 2017 deadline specified in the action plan. In 2017, a new consultation paper asked for views on:

...proposals for a register of beneficial ownership information for overseas companies or other legal entities that own or buy UK property or participate in UK central government procurement. This call for evidence seeks views on the design of the policy and additional evidence on the impacts of the policy.¹²

The paper was published on 5 April 2017. Those consulted were asked to respond by 15 May 2017 and the government published its response in March 2018, outside of the time period covered in this report.¹³

For the second milestone, the changes in law require primary legislation to alter property registration. Although the deadline for the milestone is April 2018, the Queen's Speech announcing the legislative agenda did not mention it.¹⁴ The delay may be due in part to the General Election of June 2017 and the preceding six-week campaign period. The new hung parliament may also have influenced what can and cannot be passed through.

Although there was cross-party support and backing for the changes, the need to legislate Brexit will leave little time or attention for other laws. In its self-assessment, the government suggested the draft bill would pass through Parliament between November and December 2017.¹⁵ However, CSOs estimated that any provisional law would have needed to be in Parliament in the summer session by 6 September 2017 to give it time to pass.¹⁶ In January 2018, the UK government appeared to commit to a 12-month timetable for legislation, with a promise of a register in place by 2021.¹⁷

CSOs were concerned that the proposals were delayed due to a lack of political enthusiasm on the topic from the new government, and pointed to the lack of government comment on when legislation may appear as a sign of disinterest.¹⁸ They felt that the longer the commitment was delayed, the less likely it would be implemented, as Brexit legislation took up more parliamentary time and attention.

Early Results

At present, there are no early results except the government's consultation paper.¹⁹ The consultation paper has demonstrated that there is a clear policy solution and a consensus for pushing forward these changes among CSOs and political parties in the UK.

Next Steps

Civil society stakeholders hope the government will find time to legislate this change, given that the proposals are coherent, clear and build on the existing policy by using the register that is already in existence. They are also ambitious in extending what was already an important change and addressing what the government and CSOs have seen as an important source of corruption.

The IRM researcher recommends this should be done within the current action plan cycle. Given the complexity and newness of the reforms as a whole, the operation of the entire beneficial ownership scheme should be reviewed either by Parliament or an expert body.

¹ Worthy, Ben 'Offshore Tax Havens and Beneficial Ownership: A Quick Primer', <https://opendatastudy.wordpress.com/2016/04/03/offshore-tax-havens-and-beneficial-ownership-a-quick-primer/>

² UK Government, UK G20 Beneficial Ownership Implementation Plan, by the Cabinet Office, <http://bit.ly/1Sx3iUL>

³ Department for Business, Energy & Industrial Strategy Overseas companies and other legal entities' beneficial ownership register: call for evidence, <https://www.gov.uk/government/consultations/property-ownership-and-public-contracting-by-overseas-companies-and-legal-entities-beneficial-ownership-register>

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- ⁴ Transparency International Faulty Towers: Understanding the impact of overseas corruption on the London property market, <http://www.transparency.org.uk/publications/faulty-towers-understanding-the-impact-of-overseas-corruption-on-the-london-property-market/>
- ⁵ BBC News 'David Cameron: UK property no safe haven for 'dirty money'', <http://www.bbc.co.uk/news/uk-politics-33684098>
- ⁶ BBC News 'David Cameron: UK property no safe haven for 'dirty money'', <http://www.bbc.co.uk/news/uk-politics-33684098>
- ⁷ Gareth Lloyd, "The New 'People with Significant Control' Register," Blog, Companies House, 13 April 2016, <http://bit.ly/2b3BY16>
- ⁸ Financial Transparency Coalition 'A first look at the UK beneficial ownership data', <https://financialtransparency.org/first-look-uk-beneficial-ownership-data/>, and Open Corporates 'UK Beneficial Ownership Information Now in Open Corporates', <https://blog.opencorporates.com/2016/07/06/uk-beneficial-ownership-information-now-in-opencorporates/>, and Global Witness '8 reasons why we all need to be able to see beneficial ownership data not just the police', <https://www.globalwitness.org/en/blog/eight-reasons-why-we-all-need-be-able-see-beneficial-ownership-information-rather-just-police/>
- ⁹ Open Corporates 'UK Beneficial Ownership Information Now in Open Corporates', <https://blog.opencorporates.com/2016/07/06/uk-beneficial-ownership-information-now-in-opencorporates/>
- ¹⁰ Department of Business, Innovation and Skills 'Enhancing transparency of beneficial ownership information of foreign companies undertaking certain economic activities in the UK: summary of responses', https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/606411/beneficial-ownership-transparency-summary-responses.pdf
- ¹¹ UK Government 'Consultation Outcome: Property ownership and public contracting by overseas companies: improving transparency', <https://www.gov.uk/government/consultations/property-ownership-and-public-contracting-by-foreign-companies-improving-transparency>
- ¹² Department for Business, Energy & Industrial Strategy Overseas companies and other legal entities' beneficial ownership register: call for evidence, <https://www.gov.uk/government/consultations/property-ownership-and-public-contracting-by-overseas-companies-and-legal-entities-beneficial-ownership-register>
- ¹³ Department for Business, Energy & Industrial Strategy Overseas companies and other legal entities' beneficial ownership register: call for evidence, <https://www.gov.uk/government/consultations/property-ownership-and-public-contracting-by-overseas-companies-and-legal-entities-beneficial-ownership-register>: See Department for Business, Energy & Industrial Strategy The Government response to the call for evidence https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/681844/ROEBO_Gov_Response_to_Call_for_Evidence.pdf
- ¹⁴ Cabinet Office (2017,) The Queen's Speech 2017: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/620838/Queens_speech_2017_background_notes.pdf
- ¹⁵ Cabinet Office 'Open Government Partnership National Action Plan 2016-18: Mid-term Self Assessment Report' (UK government report September 2017) passed to author pre-publication.
- ¹⁶ Interview with Rachel Davies Teka, August 2017.
- ¹⁷ Guardian (2018), May to set timetable to reveal foreign owners of UK property, <https://www.theguardian.com/politics/2018/jan/17/theresa-may-set-timetable-reveal-foreign-owners-uk-property>, also House of Lords (2018) Sanctions and Anti-Money Laundering Bill [HL] - Third Reading <https://www.theyworkforyou.com/lords/?id=2018-01-24a.1024.2#a1024.3> and here UK Public Register of Overseas Entity Beneficial Ownership: Written statement - HCWS425 <https://www.parliament.uk/business/publications/written-questions-answers-statements/written-statement/Commons/2018-01-24/HCWS425/>
- ¹⁸ Interview with Rachel Davies Teka, August 2017.
- ¹⁹ Department for Business, Energy & Industrial Strategy Overseas companies and other legal entities' beneficial ownership register: call for evidence (policy paper/call for evidence 5 April 2017)

2. Natural resource transparency

Commitment Text: *We will work with others to enhance company disclosure regarding payments to government for the sale of oil, gas and minerals, complementing our commitment to the Extractive Industries Transparency Initiative (EITI) and implementation of EU Directives, and explore the scope for a common global reporting standard.*

Objective: *In addition to commitments on timely implementation of EITI and EU Directives, the UK will work with others to enhance company disclosure regarding payments to government for the sale of oil, gas and minerals. The UK will explore the scope for a common global reporting standard and work with others to build a common understanding and strengthen the evidence for transparency in this area.*

Status quo: *Over the last decade, the UK has led the way in encouraging the extractive sector to be more transparent, notably through a combination of voluntary reporting under the EITI and mandatory disclosure rules now present in the EU, Canada, the US and other countries. But despite this progress, a significant gap still exists. Payments from physical commodity trading companies to governments and state-owned enterprises for the sale of oil, gas and minerals –which account for the majority of total government revenues in countries such as Iraq, Libya, Angola and Nigeria – remain largely opaque. Whereas taxes, royalties and other payments are included within existing home disclosure rules, payments from oil traders to governments (often \$US billions/year) are not.*

Ambition: *To enhance company disclosure regarding payments to government for the sale of oil, gas and minerals.*

Milestones:

1. *UK to publish second EITI report by 15 April 2017 and commence validation to become EITI compliant*
2. *UK listed extractive companies will be required to publish data under the EU transparency amending directive in an open and accessible format*
3. *Agree terms of reference for the dialogue on increased transparency around sales of oil, gas and minerals*

Responsible institution: Department for Business, Innovation and Skills, Department of Energy and Climate Change, HM Treasury, Financial Conduct Authority (FCA) and Department for International Development

Supporting institution(s): Department for Business, Innovation and Skills, Department of Energy and Climate Change, HM Treasury, Financial Conduct Authority and Department for International Development

Start date: May 2016

End date: March 2018

Commitment Overview	Specificity	OGP Value Relevance	Potential Impact	On Time?	Completion
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	None	Low	Medium	High	Access to Information	Civic Participation	Public Accountability	Tech. and Innov. for Transparency and Accountability	None	Minor	Moderate	Transformative		Not Started	Limited	Substantial	Complete
2. Overall			✓		✓					✓			No			✓	
2.1. UK publishes second EITI report				✓	✓				✓				Yes				✓
2.2. Data publication from UK-listed extractive companies				✓	✓					✓			Yes			✓	
2.3. TOR for the dialogue on increased transparency		✓			✓						✓		No		✓	002	

Context and Objectives

This commitment continues the ext⁰⁰⁷ves transparency commitments from the second action plan. Although CSOs welcomed new commitment, they regarded this commitment as more limited than that of the previous plan. ⁰⁰⁴of the milestones continue from the reporting requirements of the Extractives Industries Transparency Initiative (EITI), and an extension of openness to a set of companies not fully covered by earlier legislation.¹ The main problem was the 'gap' that remained in the reporting, as explained in the commitment text.

The three milestones will continue to make natural resource extractio⁰⁰³re transparent and accountable with greater amounts of information and potential for citizen audit, and curb corruption and illicit activity while closing a gap in requirements.² Milestone 1 continues the reporting under EITI rules while milestone 2 closes a gap in certain companies reporting extraction data in machine-readable form.

Milestone 3 is the most significant and involves creating co-operation between a number of countries over payment⁰⁰⁸ceived when selling and trading (rather than extracting) via government or state-owned countries resources. Such payments can be large.³

The commitment is relevant to the OGP value of access to information. While the first and second milestones are relatively clear, the third milestone has relatively low specificity and has a 'less tangible outcom⁰⁰⁶While commitment's the potential impact will be minor for closing the gap in reporting, it⁰⁰⁵ld be important on payments for selling and trading.

Completion

#002

Posted by **Joe Williams** on **04/30/2018** at **3:11pm**

Agree: 0, Disagree: 0

The ambition "To enhance company disclosure regarding payments to government for the sale of oil, gas and minerals" is potentially transformative as such disclosure would shed light on a financial flow from companies to governments which can be a countries' largest income stream but which has been opaque to date.

#003

Posted by **Joe Williams** on **04/30/2018** at **3:15pm**

Agree: 0, Disagree: 0

..."and commodities trading..."

#004

Posted by **Joe Williams** on **04/30/2018** at **3:14pm**

Agree: 0, Disagree: 0

Incorrect. Only one milestone relates to EITI.

#005

Posted by **Joe Williams** on **04/30/2018** at **3:20pm**

Agree: 0, Disagree: 0

Does not really make sense.

#006

Posted by **Joe Williams** on **04/30/2018** at **3:20pm**

Agree: 0, Disagree: 0

I believe there is some confusion here. Milestone 3 is a step towards the actual commitment to "enhance company disclosure regarding payments to government for the sale of oil, gas and minerals." This commitment is very ambitious.

Milestones 1 and 2 are not directly related to the commitment but are ongoing from the previous NAP.

#007

Posted by **Joe Williams** on **04/30/2018** at **3:13pm**

Agree: 0, Disagree: 0

Incorrect. The commitment "to enhance company disclosure regarding payments to government for the sale of oil, gas and minerals" is not about payments made in relation to extraction but in relation to trading.

#008

Posted by **Joe Williams** on **04/30/2018** at **3:18pm**

Agree: 0, Disagree: 0

Reword in relation to the actual commitment: "To enhance company disclosure regarding payments to government for the sale of oil, gas and minerals."

It is about 'home' countries working together to enhance the disclosure of COMPANIES and the payments they make to governments (including state-owned enterprises) to purchase oil, gas and minerals.

The government reported in its July 2017 update that there had been ‘good progress against milestones one and two’.⁵ The first milestone was completed on time with the publication of the UK’s second EITI report in March 2017, and all relevant background data in line with its EITI requirements. Validation is still needed, but as a result of EITI moving the deadline, not for the UK government.⁶

The second milestone covers the 90-009 companies not fully covered by the EU Accounting Directive but by the EU Transparency Directive. This milestone is on schedule to be completed.⁷ Though the companies must report data, the new directive means that they must do so in machine-readable, open format, and following guidance from the UK Financial Conduct Authority. Though the commitment applies to any company reporting after August 2016, given the uneven and different accounting deadlines for each company, all businesses will not have published machine-readable data for some time.⁸ The CSO Publish What You Pay (PWYP) expressed dissatisfaction to the FCA regarding various aspects of the technical operation of reporting, arguing that the software, guidance and means of reporting the data were inadequate.⁹

Progress for the third milestone has been slower and it is behind schedule. Though the deadline for agreeing upon terms of reference was December 2016, these agreements have yet to be reached. The latest government updates claim this is in progress and there was a ‘new OECD-hosted international dialogue on transparency in commodity trading’ where draft terms of reference were agreed.¹⁰ Another policy event was planned for December 2017. Joseph Williams, Senior Advocacy Officer at the Natural Resource Governance Institute, hoped that the agreed TOR and above-mentioned event can create a robust international dialogue on the road to more tangible results.¹¹

013 However, the UK’s involvement in EITI was put in doubt on 29 September 2017 when 20 civil society representatives withdrew from the process, including major CSOs such as Global Witness, Natural Resource Governance Institute, Transparency International UK and Publish What You Pay UK.¹² The problem arose when an organisation led by ex-MP Eric Joyce called Extractive Industries Civil Society (EICS) was given authority over certain civil society nominations.¹³ Simon Clydesdale, Oil Campaign Leader for Global Witness, said: ‘The UK government is actively subverting the process that helps ensure governments and the extractive industry are held to account over oil, gas and mining deals.’ Miles Litvinoff, Coordinator of Publish What You Pay UK, said: ‘Government officials’ decision to overlook the strong concerns expressed by the Civil Society Network is deeply worrying and goes against the democratic principles fundamental to the EITI and to the UK as a country.’¹⁴

015 EITI organisation itself tweeted that there was an ‘unfortunate situation at UKEITI.’ This is an issue first for UK civil society. UKEITI status unchanged & will be validated in April’.¹⁵ It was unclear at the time of writing how this will affect the EITI process or the rest of the OGP process.

Early Results

014 far, 011 businesses have reported data.¹⁶ Nevertheless, the kind of results that could be seen were demonstrated by the PWYP data extractors’ collaboration project, where CSOs and activists worked together to map, analyse and hold to account resource extraction activities in a variety of countries.¹⁷

Although some of the government responses were ‘disappointing’ the collaboration demonstrated how ‘civil society engagement with the disclosed data sends an important signal to host governments that civil society is vigilant and will be ready to expose corrupt or questionable dealings’.¹⁸

#009

Posted by **Joe Williams** on **04/30/2018** at **3:21pm**

Agree: 0, Disagree: 0

Number is lower. 90-100 is the total across all companies reporting under the Accounting and Transparency Directives.

#010

Posted by **Joe Williams** on **04/30/2018** at **3:23pm**

Agree: 0, Disagree: 0

This took place in January 2018 rather than December 2017.

#011

Posted by **Joe Williams** on **04/30/2018** at **3:28pm**

Agree: 0, Disagree: 0

This number seems incorrect. Could be 94.

#012

Posted by **Joe Williams** on **04/30/2018** at **3:22pm**

Agree: 0, Disagree: 0

No new directive. It was a new FCA rule/policy.

#013

Posted by **Joe Williams** on **04/30/2018** at **3:25pm**

Agree: 0, Disagree: 0

This paragraph seems out of place as it is related to the first milestone.

#014

Posted by **Joe Williams** on **04/30/2018** at **3:27pm**

Agree: 0, Disagree: 0

This paragraph seems to be related to milestone 2 and not to the main part of the commitment to "enhance company disclosure regarding payments to government for the sale of oil, gas and minerals."

#015

Posted by **Joe Williams** on **04/30/2018** at **3:25pm**

Agree: 0, Disagree: 0

This paragraph is also out of place and is related to the first milestone.

Next Steps

As the policy has been pursued across two action plans, the IRM researcher recommends it should be carried forward in some form. Though CSOs were critical of the relatively limited aims this time, this followed a high-profile commitment in the second plan and was, as the government pointed out, meant to close a gap.

One suggestion from PWYP is to make the extractives data itself more accessible with better visualizations and an interactive display, rather than being published purely as data, PWYP pointed to successful examples of accessible data from across the world.¹⁹

Joseph Williams of the Natural Resource Governance Institute recommended that future focus could be on UK oil extraction in the North Sea and the post-Brexit questions of which UK legislation would replace the existing EU extractives-based laws.²⁰

¹ Interview with Miles Litvinoff, Publish What You Pay, 25 August 2017, and Joseph Williams, Natural Resource Governance Institute, 5 September 2017. The EITI is a 'global standard to promote the open and accountable management of oil, gas and mineral resources' in 52 countries EITI 'Who We Are', <https://eiti.org/who-we-are>

² Interview with Miles Litvinoff, Publish What You Pay, 25 August 2017, and Joseph Williams, Natural Resource Governance Institute, 5 September 2017.

³ Interview with Joseph Williams, 5 September 2017.

⁴ Interview with Joseph Williams, Natural Resource Governance Institute, 5 September 2017.

⁵ Cabinet Office Open Government National Action Plan 2016-18:

July 2017 Commitment Progress Updates (commitment update for July 2017) pre-publication passed to author.

⁶ Department for Business, Energy & Industrial Strategy *Research and analysis Extractive Industries Transparency Initiative: payments report, 2015*, <https://www.gov.uk/government/publications/extractive-industries-transparency-initiative-payments-report-2015>

⁷ Interview with Miles Litvinoff, Publish What You Pay, 25 August 2017.

⁸ Interview with Miles Litvinoff, Publish What You Pay, 25 August 2017.

⁹ Interview with Miles Litvinoff, Publish What You Pay, 25 August 2017.

¹⁰ UK government commitment update for July 2017.

¹¹ Interview with Joseph Williams, Natural Resource Governance Institute, 5 September 2017.

¹² Publish What You Pay UK 'News: Civil Society Organisations withdraw from UK EITI', <http://www.publishwhatyoupay.org/pwyp-news/civil-society-organisations-withdraw-from-uk-eiti/>

¹³ Publish What You Pay UK 'News: Civil Society Organisations withdraw from UK EITI', <http://www.publishwhatyoupay.org/pwyp-news/civil-society-organisations-withdraw-from-uk-eiti/>

¹⁴ Global Witness 'UK government fails credibility test in anti-corruption fight as NGOs walk out of landmark scheme', <https://www.globalwitness.org/en/gb/press-releases/uk-government-fails-credibility-test-anti-corruption-fight-ngos-walk-out-landmark-scheme/>, and Publish What You Pay UK 'News: Civil Society Organisations withdraw from UK EITI', <http://www.publishwhatyoupay.org/pwyp-news/civil-society-organisations-withdraw-from-uk-eiti/>

¹⁵ EITI International (@EITlorg), <https://twitter.com/EITlorg>

¹⁶ Interview with Miles Litvinoff, Publish What You Pay, 25 August 2017.

¹⁷ Publish What You Pay 'Using UK company data as an accountability tool', <http://www.publishwhatyoupay.org/using-uk-company-data-as-an-accountability-tool/>, and the programme, Publish What You Pay, 'The Data Extractors', <http://www.publishwhatyoupay.org/our-work/using-the-data/the-data-extractors/>

¹⁸ See post 69.

¹⁹ Interview with Miles Litvinoff, Publish What You Pay, 25 August 2017. Examples from Indonesia, <http://eiti.ekon.go.id/en/>, Mongolia, <http://www.eitimongolia.mn/en/>, the USA, <https://useiti.doi.gov/> and Norway, <http://nettsteder.regjeringen.no/eiti2-en/> (supplied by PWYP)

²⁰ Interview with Joseph Williams, Natural Resource Governance Institute, 5 September 2017.

#016

Posted by **Joe Williams** on **04/30/2018** at **3:32pm**

Agree: 0, Disagree: 0

This was a comment in relation to milestone 1. However, the overriding priority in my view is to take forward the commitment to "enhance company disclosure regarding payments to government for the sale of oil, gas and minerals." and to build off the international dialogue noted in milestone 3.

#017

Posted by **Joe Williams** on **04/30/2018** at **3:30pm**

Agree: 0, Disagree: 0

My main recommendation is that the commitment to "enhance company disclosure regarding payments to government for the sale of oil, gas and minerals" should be taken forward in the next NAP and a specific commitment to include such trading transactions in UK transparency legislation needs to be made.