NEITI Nigeria Extractive Industries Transparency Initiative

STRATEGIC PLAN

2022-2026

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NEITI Nigeria Extractive Industries Transparency Initiative

THE PRESIDENCY

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FOREWORD

The extractive industry is currently facing the challenges of transition and transformation globally. Indeed, Nigeria and its extractive industry including the citizens are not insulated from the implications and threats posed by these developments, which have been worsened by the continuing impact of the Covid-19 pandemic. Notably, the extractive industry governance, especially the design and implementation of extractive industry transparency and accountability policies and programmes, have been severely affected by these developments. One of NEITI's roles as a facilitator of EITI processes in Nigeria is to respond to these challenges with a clear vision and plan for short and medium term.

One of the priorities of the 5th NSWG is to produce a strategic plan that effectively responds to these challenges and the demands of the new and emerging realities. Firstly, in line with our mandate, our primary objective is to contribute to the national economic agenda, in which the extractive industry plays a major role. Secondly, we must ensure that Nigeria keeps up with global standards and best practices in the extractive industry governance while also helping to shape the global body's (EITI) agenda.

Both objectives require innovative ideas and methods. So how do we respond to the new economic and industry realities? What do we need to do differently? What new partnerships or pathways do we require to transform our vision into results and impact?

This strategic plan lays out a clear path that aids our journey towards that destination. In this task, our objective is to help in building an extractive industry that would generate maximum benefits for Nigerians. To achieve this, we intend to contribute to governance reforms through data provision, policy-focused research, strategic partnerships, and innovation. The pursuit of these specific objectives will be guided by our core values.

Looking forward, our chances of success are quite pretty high. We count on the support and commitment of the our stakeholders in the EITI process the NEITI secretariat National Stakeholders Working Group (NSWG) to fully realise our dreams as contained in this Strategy Plan.

Bar. Olusegun Adeyemi Adekunle
Chairman, NSWG

ACKNOWLEDGMENT

It is my pleasure, privilege, and honour to present NEITI's Strategic Plan 2022-2026 outlining our strategic direction for the next five years.

I am proud to announce that this is the third Strategic Plan in the organization's relatively short but significant history. This is quite remarkable for a public sector institution, given the prevailing culture under which similar institutions operate. Our development of the 2022-2026 Strategic Plan is in keeping with our strong culture of deliberate and systematic deployment of ideas, assets, and resources to achieve the objectives for which we exist. It is also in keeping with our core values anchored in the belief that private or public organizations should be run in a professional way and in line with global standards and best practices.

As with previous plans, this Strategic Plan lays out our collective vision of where we need to be as an organization and the specific path(s) that we need to take to get there. However, unlike the previous plans, the 2022-2026 Strategic Plan was developed in-house by NEITI staff and consultants with the necessary guidance and direction provided by the NSWG. Our decision to use internal human resources for this plan stems from our recognition of the abundant capacity that exists in the organization. This resource is partly the product of our deliberate capacity development in policy and strategy, and the experience gained from staff's active participation in the development of the two previous plans. I am happy to note that we ultimately made the right choice in hindsight. This is evident in this outstanding document that is presented here. This work has also received input and unequivocal endorsement from NEITI's external stakeholders.

In this regard, and on behalf of the entire staff and management of NEITI, I wish to extend our profound appreciation to the Strategic Planning Committee for delivering this assignment on schedule while also carrying out their routine tasks in the secretariat. I want to especially thank Dr. Donald Tyoachimin mni, Director Policy, Planning & Strategy (PPS), for providing purposeful and competent leadership to the 2022-26 Strategic Planning Committee. I also wish to extend our appreciation to the members of the committee - Bar. Jane Onwumere, Kazeem Lameed, Chinenye Okechukwu, Mohammed Buba Lawan (FCNA), Oluwatosin Bankole, and Godwin Okpene (Secretary) drawn from various departments of the Organisation for the heavy lifting that involved extensive research, facilitation of engagements, creative writing, and detailed editing required to produce this plan.

I further wish to recognize the valuable contributions of our in-house GIZ and World Bank Consultants – Dr. Darlington Ashamole, Dr. Friday Ohuche, Dr. Dauda Garuba, and Ms. Olubukola Moronkola for the objective insights they brought to the strategic planning process.

We are also grateful to our stakeholders, who showed interest in this project beyond the standard requirements of our statutory engagements, for providing data and feedback to the process.
Finally, I want to thank the Board (NSWG) to which I am secretary, for the vision, authorization direction, and support it gave to the entire process.

Dr. Orji Ogbonnaya Orji
Executive Secretary, NEITI

EXECUTIVE SUMMARY

The Nigeria Extractive Industries Transparency Initiative (NEITI) is a subset of the Global Extractive Industries Transparency Initiative (EITI), setup in 2004 and backed by law in 2007 through the NEITI Act 2007. The EITI was setup to particularly deal with the issue established of the paradox of plenty or resource curse where countries richly blessed with natural resources perform worse than countries with no or fewer resources. The EITI's "change" concept (or theory of change) assumes that transparency in payments and revenue receipts from the extractive sector will lead to a demand for accountability in the management/ use of revenue from these resources. Since 2004, the EITI process has evolved, including emerging issues and, requiring countries to develop strategies to engage in emerging issues such as contract transparency, beneficial ownership, fiscal modeling, gender, mainstreaming, environment, energy transition, social impact, and open extractives among others. Moreover, Nigeria has developed plans and mechanisms to deal with economic issues related to the extractive value chain, revenue management, increasing inflation, unemployment, and poor infrastructure. This, therefore stresses the need for stronger collaboration with stakeholders for more transparent, accountable use of extractive resources and management of the Nigerian economy. There is also the challenge as well as the urgency to align EITI implementation to Nigeria's current development priorities, economic growth, revenue generation, security and social infrastructure rebuilding.

The NEITI 2017 – 2021 Strategic plan ended in December 2021. This necessitated the setting up of a strategic plan committee and finally the development of a new Strategic Plan (2022 – 2026). The Strategic Plan Committee set up in June 2021 by the NEITI secretariat adopted a mixed method approach in reviewing the 2017-2021 strategic plan and developing the 2022-2026 strategic plan. The primary data was used for the new strategic plan/ used for the new strategic plan was obtained through key informant interviews conducted with NEITI's staff and key stakeholders/ were obtained from interviews with key staff and stakeholders. On the other hand, the secondary data used for the project was obtained through/ from the review of some existing documents such as/ reviewed including the Economic Recovery Growth Plan (ERGP), NEITI Act 2007, NEITI Audit reports, Policy review products, validation report, EITI Standards and Guidelines, and Nigeria's Medium-term National Development Plan 2021 –2025. In addition, an environmental scanning of the internal and external environment/influencing factors and exigencies was carried out using SWOT, PESTLE, GAP analysis tool, and triangulation approach to arrive at logical conclusions. This was virtually useful in identifying NEITI's strengths, weaknesses, opportunities, threats, and gaps that informed and guided the development of the new Strategic Plan 2022-2026.

In summary, the review of the implementation of the 2017 – 2021 strategic plan, and the scanning of the environment formed the basis for the priorities, strategies, objectives, and activities of NEITI's strategic plan (2022 – 2026). The key national and international priorities of the 2022 – 2026 strategic plan include energy transition, addressing corruption risk, strengthening revenue mobilization and prudent utilization, and measuring of impact. Others include contract transparency, opening extractives to deepen beneficial ownership, mainstreaming, and economic diversification of the country's revenue base, and reform of the solid minerals sector.

Based on these reviews, the 2022 – 2026 Strategic Plan is to:

1. Ensure implementation of the Petroleum Industry Act (PIA) 2021.
2. Support and align NEITI's objectives to national, EITI and international priorities and developments.
3. Deepen the implementation of Beneficial Ownership disclosure in the Extractive Industry.
4. Facilitate revenue mobilization: Using the NEITI process to increase government revenues.
5. Support and encourage covered entities through audit process automation and technology.
6. Deepen transparency and accountability in Nigeria's extractive sector.
7. Provide a timely analysis of information and data to support revenue management reforms in the sector.
8. Promote public debate and advocacy
9. Aggressive support an capacity building and manpower development of NEITI staff and its stakeholders.
10. Encourage state and non-state actors to use NEITI reports as tools of engagement.
11. Broaden the base of NEITI stakeholders.
12. Strengthen/Improve engagements with sub-national actors/ at the sub-national level.
13. Automation of audit process, use of technology, and institutional re-engineering.
14. Review the NEITI Act to expand NEITI's roles and increase impact.
15. Provide direction on the Energy Transition debate and process.

In pursuance of this strategic direction, the vision, mission, and core values, of the NEITI will continue to guide principles, and operations of the organisation within the context and content of the three identified objectives clearly outlined in the new strategic plan.

NEITI VISION

A Nigeria whose extractive sector is transparent, accountable, and beneficial to all.

NEITI MISSION

To institutionalize accountability mechanisms and processes to instill a culture of transparency and participation in Nigeria's extractive sector for the benefit of all.

NEITI CORE VALUES

Partnership requires us to work with and act with various stakeholders.

Accountability requires us to show a firm belief to take the right action based on laws, rules, and regulations.

Professionalism requires us to employ expert skills and experience in delivering our mandate.

Integrity requires us to match our words with action in honesty and truthfulness.

Teamwork requires us to create a conducive environment that promotes collaboration among all staff.

Openness requires us to be conscious that our actions are open to public scrutiny.

Strategic Theme: Maximising Revenue, Enhancing Impact

Strategic Goal – To be a facilitator of the effective governance of the Extractive sector for maximum benefits to Nigerians.

The three main strategic objectives are to:

1. **Strengthen extractive sector governance and reforms through policy research, strategic stakeholder engagement, communication, and inter-agency collaboration.**
2. **Sustain extractive sector reporting and relevance by focusing on national and international priorities.**
3. **Achieve operational excellence in implementing the NEITI mandate through Professionalism, innovation, use of technology, resource management, and capacity building.**

Strategic Objective 1 will ensure effective governance and reform of the extractive industries through NEITI Audit and studies, improved revenue generation and fiscal regime of the solid minerals sector, well-informed stakeholders on extractive industries operations and issues, and increased public access to NEITI reports and knowledge products. Other outcomes of this objective will include; broadened stakeholder engagement, improved public understanding of the NEITI process, and sustained engagement with relevant inter – agencies platforms.

Strategic Objective 2 seeks to sustain the extractive sector reporting and relevance by focusing on national and international priorities. Key outcomes of this objectives will include timely disclosure of information and data across the extractive value chain, meeting international standards and best practices, increasing accessibility of quality Extractive Industry (EI) information and data, and meeting specific and immediate needs of stakeholders such as government, civil society, nationals, and industry.

Strategic Objective 3 will ensure operational excellence through professionalism, innovation, use of technology, effective/efficient resource management, and capacity building. The key expected outcomes of the objective are will be: improved efficiency and effectiveness in the management of resources and operations; value-driven policies; innovation, and technology-driven organization.

The Strategic Plan identified critical success factors such as leadership, professionalism and staff morale, resource adequacy, stakeholder buy-in, and others that must be considered to ensure the achievement of the goal and objectives of the strategic plan. Also, monitoring and evaluation must be integrated into the implementation plan while funding, communication, and Human resources strategies should be developed.

ACRONYMS AND ABBREVIATIONS

Acronym	Meaning
ACAs	Anti-Corrupt Agencies
ASM	Artisanal and Small Scale and Mining
BO	Beneficial Ownership
CAMA	Companies and Allied Matters Act
COVID-19	Coronavirus Disease
CSOs	Civil Society Organizations
CSSC	Civil Society Steering Committee
EFCC	Economic and Financial Crimes Commission
EI	Extractive Industry
EITI	Extractive Industries Transparency Initiative
ERGP	Economic Recovery Growth Plan
ESG	Environmental Society and Governance
FASD	Fiscal Allocation and Statutory Disbursement Audit
FOI	Freedom of Information
GIZ	Deutsche Gesellschaft für Internationale Zusammenarbeit
HDI	Human Development Index
HR	Human Resources
IATT	Inter-Agency Task Team
ICPC	Independent Corrupt Practices and Other Related Offences Commission
ICT	Information and Communications Technology
IFFs	Illicit Financial Flows
IMTT	Inter-Ministerial Task Team
M&E	Monitoring and Evaluation
MDAs	Ministries, Departments and Agencies
MOU	Memorandum of Understanding
MSG	Multi-Stakeholders Group
NAMS	NEITI Data Automation System
NBS	National Bureau of Statistics
NEITI	Nigeria Extractive Industries Transparency Initiative
NFIU	Nigerian Financial Intelligence Unit
NGOs	Non-Governmental Organizations
NNPC	Nigerian National Petroleum Corporation
NSWG	National Stakeholders Working Group
PESTLE	Political, Economic, Social, Technological, Legal and Environmental
PIA	Petroleum Industry Act
PME	Policy Monitoring and Evaluation
PPS	Policy, Planning and Strategy
SOP	Standard Operating Procedures
SWOT	Strength, Weakness, Opportunities and Threats

TAP	Transparency, Accountability, And Participation
ToC	Theory of Change
TOR	Terms of Reference
TUGAR	Technical Unit on Government and Anti-Corruption Reforms
UNDP	United Nations Development Programme

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1.0

INTRODUCTION

1.1 BACKGROUND

Contemporary discourse in political economy reckons with how natural resources have benefited or marred resource-rich countries' fortunes. Nigeria shares enormous experiences on how natural resources could be a source of both fortune and misfortune. Since independence, the country's natural resources have aided its ability to conceive and launch four different national development plans, culminating in its present level of socio-economic and political development.

Although the natural resources, especially oil and gas, have provided Nigeria with multi-billion dollars to finance development projects over the decades, they have also exposed the country to its present state of poverty amid plenty and the resource-curse syndrome. The negative impact of natural resource politics and business in Nigeria reflects her poverty with attendant corruption, insurgency, communal conflicts, collapsed social infrastructure, banditry, unemployment, poor health, education and, transportation systems, environmental degradation, poverty deprivation, diseases, etc to which the average citizen, especially in the host communities, is exposed. Such impact has also turned Nigeria into a rentier state, weakened its democratic institutions and made the citizenry docile.

These have led to a situation where the country is today an easy reference for the *paradox of plenty* and *resource curse*. Irrespective of the huge earnings from its natural resources, Nigeria (according to the study conducted by the Brookings Institute)[1] has 86.9 million people living in abject poverty or under $1.90 per day. As a result, Nigeria, which is only ahead of India in that study, has been described as the world's poverty capital. Earlier, a World Bank report published in 2018 had ranked or depicted Nigeria as "one of the five topping the list of countries with the greatest number of extreme poor" globally.

Of the 189 countries ranked in the UNDP Human Development Index in 2018 and 2020, Nigeria's position was 158 and 161 respectively. The same criteria for the ranking include long and healthy life, access to knowledge the standard of living, and the absence of essential social services such as education, healthcare, and human/physical security. These negative statistical trends and the complexities surrounding natural resource governance are why NEITI exists and redressing them is what the agency attempts and plans to achieve through its 2022-2026 Strategic Plan. The Plan also mirrors the current state of affairs in NEITI vis-a-vis where it sees itself in the next four to five years and how it plans to get there. It is intended to be implemented through (re)dedication to duty and broader collaboration with stakeholders across government, civil society, businesses, and development partners.

This observation was confirmed by the National Bureau of Statistics (NBS) report: "2019 Poverty and Inequality in Nigeria". The report states that 40% of Nigeria's 202 million population (approximately 83 million people) are living below the poverty line of N137,430 (the equivalent of $382.75) per annum.

1 https://www.brookings.edu/wp-content/uploads/2020/06/LTRC_Corruption_vfinal_x2screenreader4.pdf

1.2 EITI AND NEITI

The Nigeria Extractive Industries Transparency Initiative (NEITI) is the Nigerian subset of the global Extractive Industries Transparency Initiative (EITI). The idea of a worldwide EITI was first mooted at the World Sustainable Development Summit held in Johannesburg, South Africa, in October 2002. The concerns of the summit were: (a) The irreconcilable gap between the quantum of natural resources exploited in many developing countries. (b) The widespread poverty and underdevelopment in those countries and the veil of secrecy, institutionalized corruption, and mismanagement.

The EITI was thus proposed and adopted as a global standard for open and accountable management of extractive resources through disclosure of information along the entire extractive industry value chain from the point of extraction, revenue collection, and utilization, by the government for the benefit of citizens. The initiative seeks to strengthen a better understanding of natural resource management and provide extractive industry data that would inform democratic debates and reforms of the sector for greater transparency and accountability.

Nigeria adopted the EITI to complement the series of reforms construed to redress its history of misgovernance and outright plunder of its commonwealth, prominent among which was oil money. The targets of the reforms were to redress macroeconomic volatility fueled by over-reliance on oil export earnings, micro policy issues bothering public financial management (pro-cyclical public expenditure management pattern), structural challenges of privatisation and the banking sector, public service challenges relating to downsizing and rightsizing, and institutional and governance challenges that prioritised anti-corruption. Olusegun Obasanjo, Nigeria's president at the time, made an initial declaration to sign on to EITI in November 2003. NEITI was established in February 2004.

The NEITI Act 2007 was signed into law to facilitate transparency and accountability in the extractive revenue receipt and payments. Since its adoption, NEITI has worked through strategic engagements with relevant stakeholders across government, civil society, and extractive companies in line with established best practices and support from development partners.

Section 5(2) of the NEITI Act, 2007 stipulates that the National Stakeholders Working Group shall be responsible for formulating policies, programmes, and strategies for the effective implementation of the objectives and the discharge of the functions of the NEITI.

Since coming on stream, the EITI has passed through several phases of reviewing its standards, winning awards, and receiving accolades for being a global flagship. Starting with 12 Principles, which became refined and improved as EITI Rules in 2011, the global standard has gone through three additional transformational phases referred to as 'the Standard' in 2013, 2016, and 2019. Across these different phases, Nigeria has produced 12 cycles of oil and gas audit reports covering 1999-2019, 10 solid minerals audit reports covering 2007-2019, and two Fiscal Allocation and Statutory Disbursement (FASD) audit reports covering 2007-2016. Statistics of revenue earnings for the different years covered in the NEITI oil and gas and solid minerals audits show a huge progression, except for the periods of economic meltdown and fall in commodity prices. For example, diagram 1 and 2 shows the oil and gas and the solid minerals revenue pattern in the years covered by NEITI audit reports.

Diagram 1: **Nigeria's Oil and Gas Revenue Earnings from 2005 -2019 (US$)**

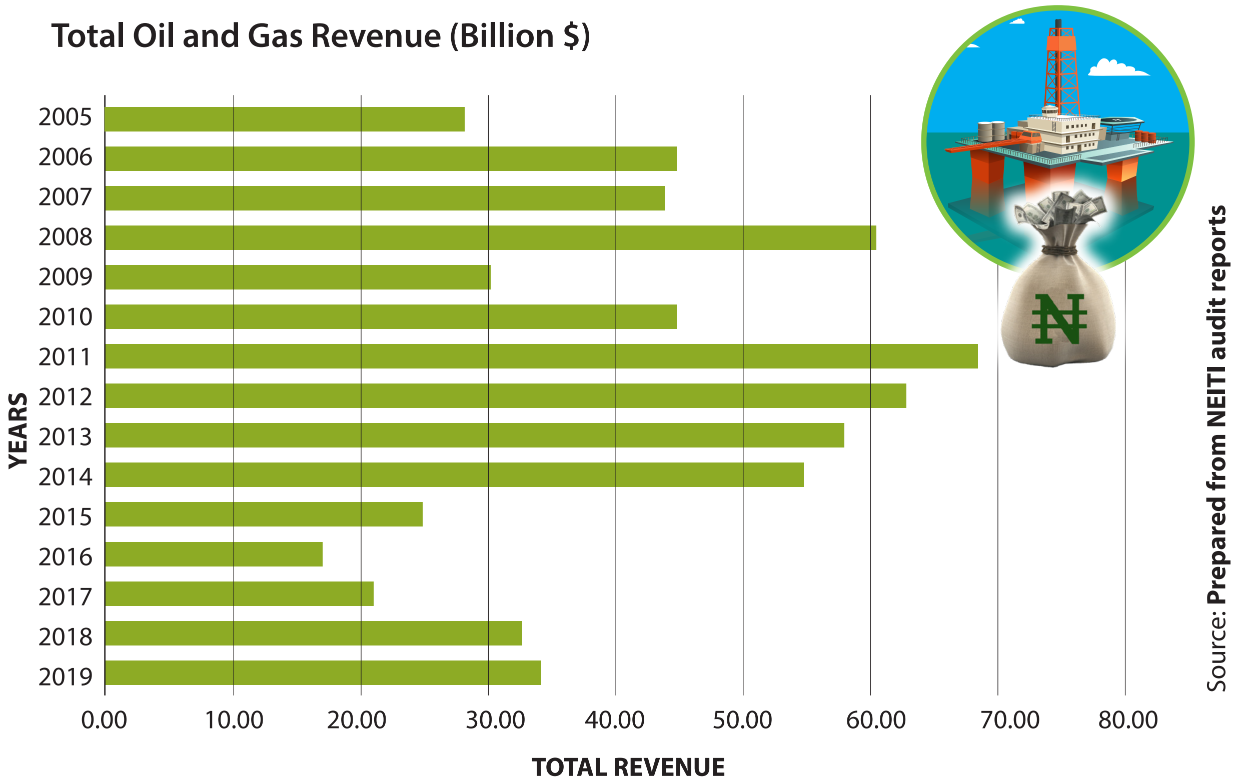
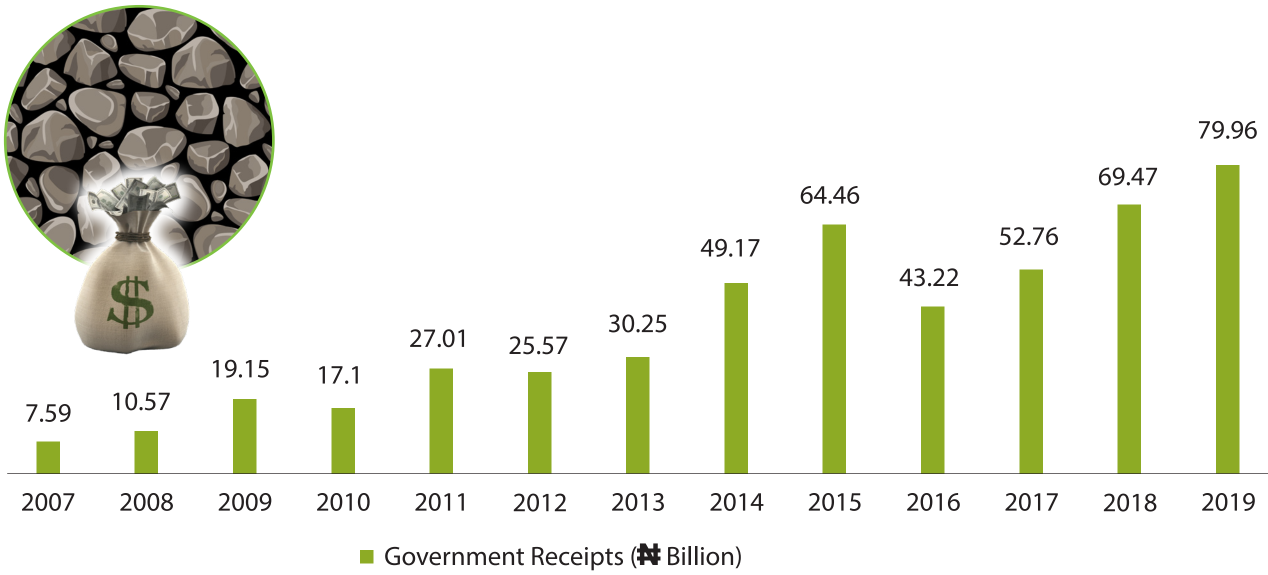


Diagram 2: **Nigeria Solid Minerals Revenue 2007-2019(₦'B)**



Source: **NEITI Solid Minerals Audit Reports.**

The three categories of NEITI audit reports and NEITI policy papers have provided information about infractions across the value chain of extractive sector governance and revenue management and recommendations for implementation to achieve desired reforms. This necessitated a closer collaboration by stakeholders for a more transparent, accountable, and optimal use of extractive resources and management of the economy.

The EITI continues to evolve, requiring that NEITI fashions out ways of engaging new emerging issues in 2019 EITI standards. Prominent among the emerging issues are Contract transparency, Beneficial ownership, Fiscal modeling (forecasting and tax analysis), Gender, Environment, Social impact, Mainstreaming, and Energy transition. Besides requiring new disclosure/reporting arrangements, these issues interface other necessities, among which are changes in the leadership of NEITI at the levels of the National Stakeholders Working Group (the Board) and the Office of the Executive Secretary, changing global and national contexts and priorities, increasing opportunities for innovative and technological deployment and operations, and the gradual edging of the 2017-2021 NEITI Strategic Plan to its terminal end. Beyond being imperative, replacing the 2017-2021 Strategic Plan with a 2022-2026 Plan will need to meet the new dynamics and realities of the extractive sector landscape while still prioritizing poverty reduction and more inclusive lasting benefits for Nigeria and its citizens.

1.3 METHODOLOGY

The development of the 2022-2026 NEITI Strategic Plan commenced with a staff retreat which reviewed the 2017-2021 Strategic Plan to assess its performance, with particular reference to achievements, gaps, and challenges and projection for new directions and opportunities for executing the mandate of NEITI. The agency constituted a strategic planning committee in June 2021 to develop its 2022 – 2026 Strategic Plan. Membership of the committee is made of:

NAME	DESIGNATION	MEMBERSHIP
Donald Tyoachimin PhD mni, FCA	Director, PPS	Chairman
Mrs. Jane O. Onwumere	Deputy Director, Legal/TUGAR	Member
Mr. Godwin Okpene	Assistant Director, PPS	Secretary
Ms. Chinenye Okechukwu	Team Leader, Technical	Member
Mr. Mohammed Buba Lawan (FCNA)	Team Leader PME	Member
Mr. Kazeem Lameed	Team Leader, Outreach	Member
Mrs. Tosin Bankole	Senior Officer I, HR & Admin	Member
Dauda Garuba PhD	World Bank Consultant	Member
Friday Ohuche PhD	World Bank Consultant	Member
Darlington Ashamole PhD	GIZ Consultant	Member
Ms. Olubukola Moronkola	World Bank Consultant	Member

The methodological approach adopted for developing the strategic plan was a mixed one, involving primary and secondary data collection methods.

1

Primary Method: The primary data were collected through Key Informant interviews (KIIs) held with the NEITI Executive Secretary and Directors/Heads of Departments and Units.

2

Secondary source: The secondary source materials were obtained from desk reviews of relevant documents such as the Economic Recovery and Growth Plan (ERGP), Nigeria's Medium-Term National Development Plan 2021-2025, NEITI Act 2007. NEITI audit reports and policy products, annual progress reports. Validation Report, EITI and Guidelines, addresses and speeches by present and past NEITI leaderships (both Boards and Executive Secretaries) as well as major publications on NEITI and its work.

3

Focus Group Discussions (FGDs) were also held with members of the staff, consultants and interns in-house across departments and units in the NEITI Secretariat. This approach provided an opportunity for obtaining deeper revealing information that is available in the process. Still, it is also ensured that all views expressed by respondents-irrespective of hierarchy and cadre-were taken into account and incorporated in the final product.

4

In addition, a **diagnostic review of 2017-2021 Strategic Plan** identified achievements, challenges and gaps and provided the strategic focus of the new Strategic Plan.

5

Finally, environmental scanning was done using **SWOT, PESTLE,** gap analyses tools, and triangulation to arrive at rational conclusions.

2.0

REVIEW OF THE IMPLEMEMTATION OF THE 2017-2021 STRATEGIC PLAN

2.1 INTRODUCTION

The 2017-2021 Strategic Plan anchored on the theme "Scaling up impact and relevance". The framing was underscored by the desire to draft NEITI into the policy arena that will enable its deliveries to drive debates and reforms for necessary impact and relevance.

The central goal of the 2017-2021 Strategic Plan, as fashioned by the Board, was to make NEITI "an active and effective facilitator of reversing the effects of the resource curse in Nigeria." To actualize this, the Plan envisioned "a Nigeria whose extractive sector is transparent, accountable, and beneficial" to the citizens" through institutionalized "accountability mechanisms and processes aimed at instilling a culture of transparency in Nigeria's extractive sector to benefit all." Four strategic objectives were adopted to achieve this, and these were:

- Deepen openness in the extractive sector through timely audits and other impactful studies
- Shape extractive sector and overall governance reforms through policy engagements through leadership and inter-agency coordination
- Strengthen demand for accountability in the use of extractive revenues through strategic communication with critical stakeholders and empowerment of accountability actors and
- Increase operational capacity, legitimacy, and support through effective financial, administrative and human resource management and adequate funding.

All four objectives were conceived to enhance transparency, accountability, and efficiency in using extractive resources for inclusive economic growth and poverty reduction. They were also proposed with a clear focus on public value, operational capacity, and requisite public support founded on visibility that is based on defined core values of Legitimacy, Integrity, Partnership, Courage, Openness, and Teamwork. The activities that were undertaken to realize the 2017-2021 Strategic Plan objectives saw NEITI work assiduously to improve its political and institutional connections with relevant stakeholders, pursue organizational capacity development, and close the delays that exist in the release of its audit reports. NEITI also initiated relevant policy research products – Briefs, Quarterly Reviews, and Occasional Papers Series – to drive debates and push for extractive sector governance reforms as it worked to advance the use of technology to expand the reach and depth of its stakeholders' engagement, and enhance efficiency. In line with the growing interest for feedback on progress and challenges with programme implementation, the 2017-2021 NEITI Strategic Plan also embraced the idea of and facilitated the development of a monitoring and evaluation (M&E) framework imbued with key performance indicators that guided its operations and reporting.

The implementation of the Plan recorded enormous milestones. A review of the M&E reports to the Office of the Secretary to the Government of the Federation (OSGF) and the series of inquests conducted by the Strategic Plan team across different staff cadre and external stakeholders attested to the tremendous progress recorded in terms of the timeliness of the audit reports; ingenuity in the communication of the findings of its audit reports to stakeholders across government, civil society and business, and the linking of NEITI reports and policy reports to pro-accountability policies and reform programmes of government. Prominent among the recognitions it attracted was the celebration of its launched publicly accessible register of Beneficial Ownership and the amendment to the Deep Offshore and Inland Basin Production Sharing Contract Act 2019.

Laudable as the above seem, the 2017-2021 NEITI Strategic Plan implementation had its own hiccups, among which are its heavy focus on oil and gas to the exclusion of solid and metallic minerals. In a sense, this has implications for the major policy plan of President Buhari's administration which emphasises economic diversification in favour of agriculture and solid minerals.

Despite inheriting and being faced with the challenges identified above, the 2017-2021 Strategic Plan also acknowledged that NEITI lacks the authority and control over the MDAs and therefore lacks the sole power to reverse the symptoms and the economic consequences of the resource curse.

This understanding underscored NEITI's push for unequivocal political support for institutional reforms and stability and long-term-driven macroeconomic policies aimed at facilitating transparent and accountable management of extractive revenues. The effort has yielded or recorded enormous success. The most significant positive impacts are the regularity and timeliness of audit reports, policy research, targeted engagements (including the joint NEITI-NNPC remediation work), and policy redress.

The process has not been without challenges. Prominent among them, as mentioned previously, is that the 2017-2021 Strategic Plan was oil and gas heavy compared to the limited attention devoted to solid minerals. This negates the policy priority of the government, which seeks to elevate the latter for economic diversification. Also, many policy briefs did not lead to the convening of policy dialogues or bilateral engagements on their contents. Furthermore, the declining quality of audit reports produced and the drop in subnational outreaches and engagements were also part of the pitfalls in implementing the 2017-2021 Strategic Plan.

Other issues include the depth of the NEITI audit reports, limited coverage of its rich policy products, and limited stakeholder engagement at the subnational level. These shortcomings, combined with new dynamics and trends in the extractive sector, make a case for a new theory of change in the 2022-2026 NEITI Strategic Plan.

2.2 REVIEW OF THEORY OF CHANGE

The 2017-2021 Strategic Plan underscored the assumption of the original EITI Theory of Change (ToC) which is anchored on a fundamental cause-and-effect assumption that transparency in "payments and receipts of revenues from the extractive sector will lead to demand for accountable use of these revenues, which will, in turn, lead to good governance and shared prosperity" in implementing countries. Nigeria's experience with this assumption anchored on the mechanics of conduct and publication of audit reports, dissemination of the reports, engagement, and collaboration with stakeholders to implement the reports' recommendations was not as straightforward as conceived. NEITI witnessed significant success in the first two mechanisms; however, the latter did not yield the level of expected outcome. This made it impossible for Nigeria to overcome the damaging impact of the resource curse exemplified by deepening poverty and underdevelopment.

While the above situation was not unique to Nigeria, the 2017-2021 Strategic Plan sought to redefine NEITI's ToC to address certain broadly classified gaps, specifically weaknesses relating to transparency and access to information, demand-side engagement capacity, limited political support to proposed policy reforms, imbalance in macro-economic management, and non-implementation of NEITI audit recommendations by relevant ministries, departments, and agencies (MDAs). Deriving from that, the ToC in the 2017-2021 NEITI Strategic Plan prioritised regularity and timeliness of audit reports; a target-driven approach to communicating findings of the reports to partners across government and civil society with the right platforms and incentives to advance public accountability; deepened and broadened public understanding and demand for accountability, and strategic linkage of NEITI audit reports to pro-accountability policies and reforms.

Moreover, natural resource sector governance experts' research has shown that pursuing Transparency, Accountability, and Participation (TAP) on its own has not been sufficient. Addressing the issue of corruption in natural resource governance requires a more complex and well-thought-out analysis. This position reinforces the direction of the 2017-2021 strategic plan. To provide a framework for "more complex and well thought out analysis", experts have proposed the TAP-Plus approach to anti-corruption in the natural resource value chain identifying contextual factors that need to be considered along with TAP. These factors are;

These factors need to be assessed per specific TAP intervention, explicitly considered, and measured.

Beyond addressing the gaps above, the rationale for a new ToC (moving forward) anchors on the changing environment and dynamics of the extractive sector.

2.3 ELEMENTS OF THE NEW THEORY OF CHANGE (TOC)

Elements of the new ToC for NEITI must reckon with certain fundamentals, including the transition in leadership and the changing local and global context, content, and dynamics within extractive industry operations and discourses. Prominent among these are:

- EITI Standard, revised in 2013, 2016, and 2019 to accommodate emerging issues such as contract transparency, Beneficial Ownership, Fiscal modeling (forecasting and tax analysis), Gender, Environment, and social impact, Mainstreaming, and Energy transition. These brought new reporting requirements within the lifetime of the 2017-2021 Strategic Plan;
- The Fall in commodity prices started in Mid-2014 but was compounded by the ravaging impact of COVID-19, leading to Nigeria's slip into recession twice between 2016 and 2020.
- Government's desire for more revenue to mitigate the negative impact of low commodity prices and to support the ever-growing list of public expenditure priorities and national development.
- Increased visibility of extractive sector corruption.
- The revolution in open data and its link to a greater emphasis on issues of access and use for analysis.

- The desired amendment of the NEITI Act 2007 is to address Identified gaps and give equal and balanced attention to solid minerals.
- Dawn of a new Petroleum Industry Act (PIA 2021) after several failed efforts.
- COVID-19 and the changing phase of and approach to work (new normal) and
- Growing demand to link NEITI reports to impact.

3.0

REVIEW OF NEITI'S INTERNAL AND EXTERNAL ENVIRONMENT

3.1 INTRODUCTION

A review of the internal and external environmental factors, which have implications for NEITI's operations and success, are captured in SWOT and PESTLE analysis. The two analytical tools are prerequisites for the development of a strategic plan. Specifically, with SWOT, a diagnostic review of the Strengths, Weaknesses, Opportunities, and Threats that define NEITI's internal operational environment, as regards the previous strategic Plan (2017-2021), was carried out.

The essence of the SWOT analysis is to match the Strengths of NEITI against its Weaknesses and calibrate available opportunities that can mitigate any identified Threat(s) in the current Strategic Plan (2022-2026) – as this is the basis for planning for the future. The PESTLE analysis was used to scan the external environment beyond the internal controls of NEITI. The outputs and issues identified through the SWOT and PESTLE analyses informed and shaped the strategic goals, objectives, and activities in/ the New Strategic Plan.

3.2. THE SWOT ANALYSIS (INTERNAL)

The issues identified through the SWOT analysis of NEITI's operational performance are summarized below.

STRENGTH

The following are identified as NEITI's Strengths:

Affiliation with EITI: NEITI's affiliation with the global EITI is major Strength in its current operations. It allows NEITI to exercise its mandate and operate within Nigeria's public service space without political interference or domestic institutional constraints. It is expected that with NEITI's affiliation with the EITI, its activities will continue to be benchmarked against international best practices and standards. Indeed, in recent years, NEITI has emerged as one of the global champions of the extractive industries transparency initiatives, given its visibility in EITI programs and projects. For instance, Nigeria currently heads the global Contract Transparency Board of the EITI. This is in recognition of her commendable role in promoting and advancing the idea of contract transparency in Nigeria. Furthermore, the strong/high level of independence enjoyed by NEITI and guaranteed through the-NEITI Act 2007 has encouraged the organisation to conduct and publish its reports without fear or favour courageously. This is a significant strength, given the level of aversion to transparency that exists in the extractive industries and institutions and the enormous powers such institutions wield in Nigeria's fiscal and governance spaces.

Data Integrity: Another major strength of NEITI that emanated from implementing the 2017-2021 Strategic Plan is "Data Integrity": the integrity of the data released by NEITI. The emphasis/insistence on the timely release of NEITI data by strategic partners and accountability actors, the strict interrogation of the data by NEITI, and their presentation in the NEITI reports for policy purposes have all greatly improved the integrity of the data from NEITI as a transparency and accountability organization. Therefore, there is high public demand for NEITI Reports, which has significantly encouraged the focal/responsible institutions to ensure that their conducts and operations are in line with NEITI's transparency and accountability codes.

Table 1: SWOT Analysis Quadrant

Strengths	Weakness	Opportunities	Threats
• NEITI ACT 2007 • NSWG • Strong internal staff capacity • Effective Management • Welfare staff • Diversity • Data Intergrity • Timely Audit Report • Affiliation with EITI • Strong presence in the Media	• Limited Stakeholder Engagement • Gaps in the NEITI Act • Poor structuring of the departments.	• Emerging reforms in the extractive industry • Petroleum Industry Act (PIA) • Amendment of the NEITI Act 2007 • NEITI Data Automation Platforms (NAMS, BO Portal • The CAMA 2020 • NEITI permanent building • New Leadership at the secretariat	• Absence of sustainable funding strategy • Poor working environment • Implementation of NEITI Audit Reports Recommendations • Nigeria's Political Environment • Attribution and ownership of impact

Timely Audit Reports: Until recently, there has been a huge delay in the release of NEITI Reports to the public. The situation did not only negatively impact the Reports' usefulness, given the longtime lag in making the reports available for planning and policy purposes, but it equally questioned the capacity of NEITI to discharge its functions timely and effectively. This scenario, however, changed with the implementation of the 2017-2021 Strategic Plan. Since this Plan, NEITI has consistently released its reports its timely and this has formed part of its strengths.

National Stakeholders Working Group (NSWG): NEITI's Multi-Stakeholders approach enables wider stakeholders' consultation to discharge NEITI's statutory functions. Given that the strategic objectives of NEITI are cross-cutting and collaborative, the multistakeholder arrangement allows NEITI to project its statutory powers and sphere of authority in the discharge of its functions, galvanizing efforts and guiding relevant stakeholders towards achieving the overall objectives of EITI in Nigeria.

Strong Presence in the Media: The efforts toward achieving NEITI's strategic objectives have been supported by good media exposure, which has increased NEITI's public perception and acceptance. It is currently accentuating the impact/contribution and strategic importance of NEITI in Nigeria quest for economic diversification and sustainable growth through improved revenue generation and application.

Strong Internal Staff Capacity: Strong internal staff capacity, appropriate professional mix in staff skillsets, relevant and diversified background experience have all played significant roles in effectively implementing the strategic objectives of the 2017-2021 NEITI strategic plan. In addition, the capacity and effectiveness of NEITI's workforce are evident or reflected in NEITI's ability to conduct open, transparent, and timely Audit processes.

It enabled NEITI to clear the backlogs of Audit reports and enhanced NEITI's pro-activeness in addressing future challenges that impede timely conclusion and submission of audit reports.

Effective Management: Driving the effective management of internal Strength of staff capacity has created good working relations among the staff and a good environment that supports work and continuous focus on improving the welfare of the employees while providing strategic direction in NEITI's strategic plan implementation.

It also enabled NEITI to respond quickly to EITIs emerging issues such as energy transition, contract transparency, and open data management when it was not in the last strategic Plan.

WEAKNESS

Internal weaknesses have constrained the optimal performance of NEITI in implementing the strategic objectives of the 2017-2021 strategic plan.

First, the most significant internal weakness is in the area of sub-national outreach. NEITI is yet to build a robust outreach programme, public education, and enlightenment engagements at the state and local government levels. This weakness tends to understate the capacity of NEITI beyond the Federal level. There is also the need to broaden stakeholders' engagement base to include urban and rural-based CSOs and build the capacity of the civil society and the media to use the data and information in the reports to hold government and companies accountable.

The second gap exists in the NEITI Act 2007, the legal instrument upon which NEITI derives its powers to function. The Act contains some clauses that constrained the ability of NEITI to deliver on the last Strategic Plan optimally. In addition, poor structuring of some departments tends to create overlaps and duplication of functions, which leads to resource underutilization, waste of scarce resources, and precipitates role conflicts in some cases. Other weaknesses include a lack of consistent and robust staff capacity-building programmes, limited staffing, and poaching, which have put enormous pressure on the available ones to perform optimally.

Though NEITI invested enormous professional energy and material resources in producing its reports in the 2017-2021 Strategic Plan, implementation of the recommendations is always short of expectations. The lack of consistent implementation of recommendations in audit and other reports impacts expected outcomes of the implemented objectives of NEITI and this constitutes a major weakness.

More importantly, some audit reports are not reader-friendly and contain some highly technical terms and recommendations that challenge seamless implementation. Again, given that NEITI lacks enforcement powers, the ability to enforce the recommendations is thrust upon other agencies which may not have fully understood or appreciated the relevance or urgency of the recommendations. Equally, the gaps in documentation of outcomes and impacts that did not receive adequate attention in implementing the immediate past strategic plan were also identified as weaknesses that urgently need to be addressed in the new strategic Plan 2022-2026.

OPPORTUNITIES

Emerging Reforms: Opportunities exist to enhance the performance of NEITI in the New Strategic Plan from the emerging reforms in the extractive industries especially, oil and gas, solid minerals, and renewable energy sector. Specifically, the solid minerals sector holds as much of a revenue-yielding opportunity as oil and gas if NEITI"s transparency and accountability initiatives are fully deployed in its operations. Another significant opportunity is the Petroleum Industry Act (PIA) 2021. With the enactment of the Act, the oil and gas sector will open opportunities to attract more domestic and foreign investments and increase the revenue yielding capacity of the federation with NEITI actively involved in its transparency and accountability drive in the sector. Furthermore, the growing acceptance of NEITI by beneficial entities also provides an opportunity to entrench accountability and transparency in the management of those entities and allow the agency to improve their performance in the new Strategic Plan.

Amendment of the NEITI Act/Opportunity to Amend the NEITI Act 2007
Amendment of the NEITI Act 2007 is expected to enhance the opportunity of the agency to improve on the implementation of its statutory objectives. The review will provide the opportunity for the amendment of some clauses in the Act that constrain NEITI to fully leverage its statutory roles to open up the sector for accountability and enhance the federal government's revenue base.

Data Automation: An opportunity that exists with the potential to enhance NEITI's performance in the new strategic Plan is NEITI's data automation programs. The NEITI Data Automation System (NAMS) is intended to automate data collection and support reconciling financial data provided by and the Government Companies.

The Data Automation process would simplify the audit process and improve the timeliness of NEITI's reports while drastically reducing the amount of time the audit reports take to he publish.

New Leadership at the Secretariat: New leadership at the secretariat appointed from among the trained staff with requisite skill, knowledge, competence, and institutional memory of the EITI/NEITI process is also an opportunity. The current Executive Secretary, appointed by the President on February 19th, 2021, has been a member of the NEITI workforce and well trained and exposed to the EITI/NEITI process before his appointment. The new NSWG is led by technocrats and dominated by experienced professionals in the industry.

NEITI's Permanent Building: The Federal Executive Council approved a permanent building for NEITI on 18 August 2021. This comes when NEITI needs to grow its staff strength, but also, NEITI needs a world-class environment to help improve its operations. The new building will not only help to put permanency to NEITI's location but also, it will serve as the headquarters of its operation in Nigeria. In addition, this quest will help NEIT.

Model of NEITI's Secretariat

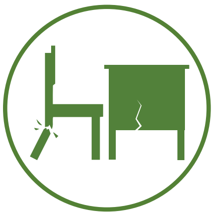
The Petroleum Industry Act: The Petroleum Industry Act 2021 (PIA) was passed into Law in August 16th, 2021. The PIA. The new law provides for a dynamic governance framework required to re-position the petroleum industry to fully embrace competition, openness, accountability, professionalism, and better profit returns on investments to both companies and the government. The new Act prescribes changes in governance and institutions in the petroleum sector, including a commercially oriented National Petroleum Company, establishment of New Licences and Leases, Development of Model Licence and Model Lease, creation of trust funds, Incorporated Joint Ventures, Domestic Base Price and Pricing Framework including Rents and Royalty, Environmental

and Gas Flare Management and Penalties amongst others. This Law provides an excellent opportunity for the reform of the sector and NEITI has an opportunity to leverage the transparency provisions in the law to support and strengthen EITI implementation in Nigeria.

THREATS

Notwithstanding the preceding opportunities in NEITI's operating environment, threats to the successful implementation of its strategic objectives exists.

Absence of Sustainable Funding Strategy: The absence of a sustainable funding strategy constrains the ability of NEITI to expand its operations in areas granted to it by the enabling Law.



Poor Working Environment: Lack of a befitting and motivating work environment demotivates staff to optimally deliver on their assignments due to the absence of befitting offices, recreational facilities, and even parking spaces.

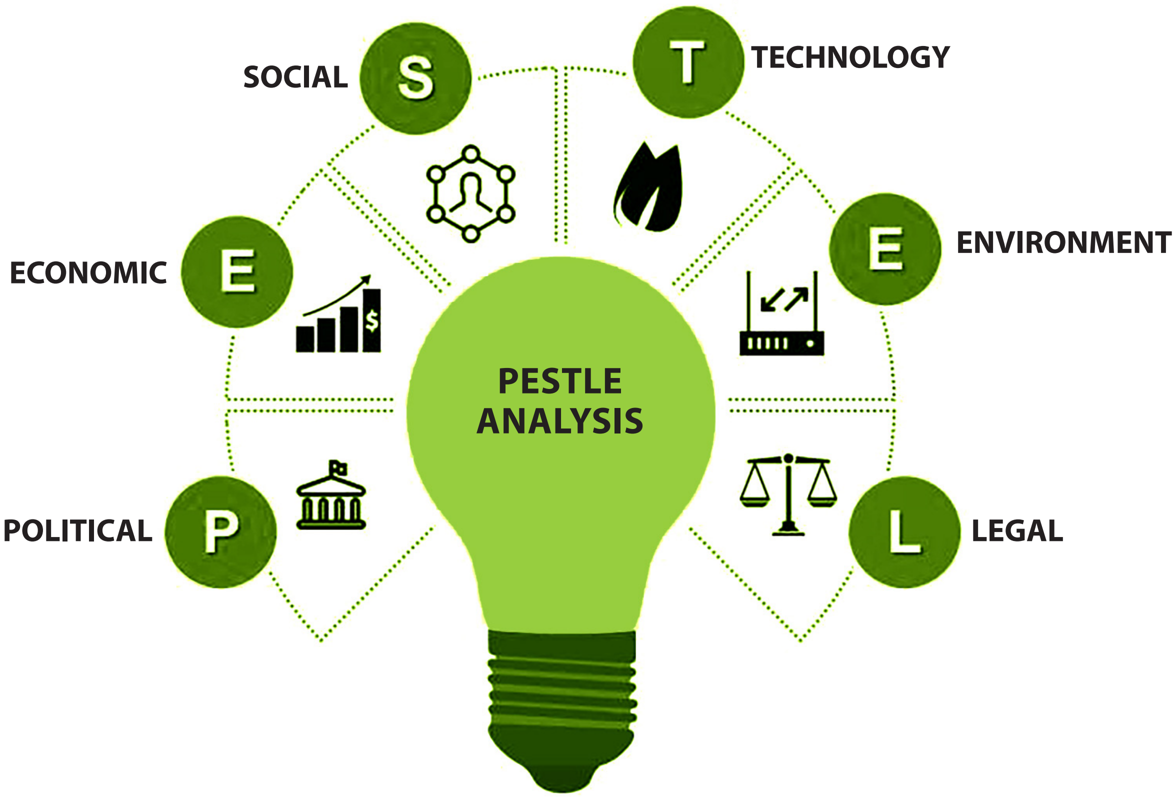
Slow Implementation of NEITI Audit Report Recommendations: The slow pace of implementation of NEITI recommendations in its audit reports has two consequences as a source of threat to the achievement of strategic objectives in the preceding strategic Plan; (a) it does not inspire NEITI to achieve more milestones, (b) it reduces the visibility of NEITI in the fight for transparency and accountability in the extractive sector in Nigeria.

Uncertain Political Environment: Uncertainty in Nigeria's political environment constitutes a threat to NEITI in several ways; namely, the prospects of policy summersaults resulting from regime change can undermine the consistency in the implementation of NEITIs strategic mandates. In addition, NEITI relies on strong institutional support from the government to effectively perform its statutory functions, without which it cannot deliver on its mandate as at and when due. Therefore, the lack of continuity in most government policies presents an enormous threat to the seamless implementation of NEITI's programmes, which needs to be addressed in the current Strategic Plan.

Energy Transition Debate: The contemporary global discourse on energy transition constitute a major threat to the successful implementation of the plan. For instance, the World Bank projects that by 2050, hydrocarbon will no longer be the primary source of energy globally. The effort to focus on alternative renewable energy sources is motivated by the impact of carbon emissions on climate change and its damaging effect on the sustainable environment. In addition, many countries in Africa have discovered oil. However, a global supply glut partly affects the appropriate product pricing and even sustains demand in the future.

3.3. PESTLE ANALYSIS (EXTERNAL)

PESTLE analysis in the context of the development of the NEITI Strategic Plan (2022-2026) is warranted by the need to analyse and understand external factors beyond the control of NEITI, which could negatively or positively impact the achievement of its strategic objectives in the future.



POLITICAL FACTORS

Some identified political factors include the slow political process associated with the amendment of Acts in Nigeria which could impact the amendment of NEITI Act 2007, hitherto identified as an opportunity to enhance NEITI's operations going forward. Passage of the Petroleum Industry Act is a positive development, but its implementation's cumbersome bureaucratic processes could undermine its expected role in transforming the oil and gas sector in time. The inability of the National Assembly to hold public officers accountable in the implementation of their budgets through their oversight functions permits budget padding and resource leakage in the system. The need to improve the NEITI's financing requirements is predicated mainly on the amendment of the current NEITI ACT 2007 may not materialise in time to enhance the implementation of the new Strategic Plan. The slow process of amending the Act due to its cumbersome political and legislative processes could hinder expected results. Policy summersaults and lack of continuity in government policies often associated with regime transition could undermine the continuity of NEITI's programmes and projects in the new Strategic Plan.

ECONOMIC FACTORS

Economic factors that could play critical roles in the achievement of NEITI's strategic objectives in the new plan include the poor rate of GDP growth of the economy which has witnessed two major recessions in a decade could scare investors away from extractive industries space and entrench a prolonged regime of unemployment and poverty. Implementing the PIA 2021 could improve governments' revenue and budget outlay. However, high-interest rates could impede access to finance by investors in the extractive industries. Unstable exchange rates will impact investors' business projections and depreciate the Naira, which has implications for inflation and poverty.

In addition, a high inflation environment and weak monetary policy regimes that do not bring down interest rates could undermine the impact of higher revenues and the ability of the government to address challenges in infrastructural development. It is important to note that the infrastructure deficit in Nigeria is a critical economic factor that does not support the inflow of domestic and foreign investments into the country.

SOCIAL FACTORS

The social environment also plays a critical role in enhancing the ability of NEITI to deliver on its strategic objectives both in the past and even in the future. For instance, the lack of affordable health care and brain drain in the health sector can potentially impact the productivity of NEITI's workers.

In addition, the lack of recreational facilities in NEITI's office could compromise the lifestyle of workers with implications for improved productivity and work attitude. Lack of motivation for the staff could also have a far-reaching impact on their productivity and output. Rising poverty also constitutes a social challenge in the implementation of the NEITIs mandate in a significant way. Nigeria, in recent times, has been dubbed the Poverty Capital of the World with consequences for dwindling economic opportunities for many and poor income growth for her citizens.

Practically, the local demand for products of Extractive industries may be impacted by low-income growth and this will translate into a reduction in investments in the sector. Therefore, given the reduction in investments the mandate to ensure improved revenue generation for the government by NEITI will not materialize over time.

Peace and security challenges are major social issues that can negatively impact the implementation of NEITIs strategic objectives. For instance, insecurity has been on the rise in Nigeria in recent times. This poses an enormous threat to the operations of the extractive industries in Nigeria. In addition, the rising cases of kidnapping of extractive industries workers, banditry, and illegal mining activities that trigger clashes between illegal miners and security forces create an insecure environment for enhanced extractive industries activities in the country. Without addressing these security issues NEITI's efforts to improve the government's revenue could be negatively impacted in the medium to long run.

TECHNOLOGICAL FACTORS

Technological factors such as sudden disruption in technology through research and innovation can potentially impact current Data Automation projects of NEITI. On a positive note, the rapid transformation of the administrative process to enhance NEITI's ability to deliver on its mandate could be supported by robust ICT processes. However, a lack of such opportunities could negatively impact the output of the organization. Lack of critical ICT working tools such as Laptops, phones, and networks has the potential to negatively impact the productivity of NEITI staff in the achievements of its strategic objectives.

Political Factors	• Political Will • Transparency & Accountability • Institutional Capacity	• Beneficial Ownership • Change in Governance	
Economic Factors	• Oil Price Volatility • Unemployment • Financing of Sector i.e Cash calls	• Declining Revenue • Inflation • Depreciation of the Currency • Corruption	• Illicit Financial Flows
Social Factors	• Increasing poverty • Well being of the people (Health) • Covide-19 Pandemic	• Peace and Security • Illegal Mining • Banditry	
Legal Factors	• Implementation of the PIA • Reforms in the Solid Mineral Sector		

Environmental Factors	• Host Community Issues • Environmental Hazards • Climate Change Factors	
Technological Factors	• Cheaper Energy resources • Energy Transition • Exploration Technology	• Outdated Infrastructure

LEGAL FACTORS

The legal environment is also considered a critical factor in determining the success or failure of NEITI in achieving its strategic objectives. Some of the notable issues in the legal environment include the cumbersome legislative process in Nigeria, which may negatively impact the quick amendment of the NEITI's Act 2007 to pave the way for more achievement of NEITI's strategic objectives. Furthermore, a lack of enforcement of laws on Secrecy could compromise the protected information on NEITI'S activities. This could compromise critical information about NEITI's operations. In addition, the apparent lack of Anti-Trust laws has encouraged monopoly in the oil and gas sector in Nigeria, especially in the downstream sector. Monopoly market structure does not support competition in the sector which could unleash efficiency in production, prices, demand, and supply of energy products in Nigeria.

ENVIRONMENTAL FACTORS

Lastly, environmental factors can also impact NEITI's ability to perform its statutory functions effectively. For instance, the lack of an operational Gas Policy and the slow pace in the development of environmental laws can impact NEITI's programmes on energy transition. Improvement in transparency and accountability in the Renewable energy sector will enhance government revenues through NEITI's transparency and accountability initiatives; however, the lack of environmental protection laws and their enforcement could impede the achievement of NEITI's strategic objectives in the New Plan.

3.4 NATIONAL AND INTERNATIONAL PRIORITIES

3.4.1 INTERNATIONAL PRIORITIES

EITI Priorities

The extractive sector faces a triple threat of crisis, the covid-19 pandemic, an oil price slump, and a downturn in commodity prices. These pose risks and opportunities for the EITI. The most critical that the EITI identified as having great relevance and potential impact were reduced demand for oil, a buoyant demand for strategic minerals, diversification of energy companies, extractive revenues being under strain, and EITI governance implications. These developments show a shift; the EITI Board agreed on reporting and validation flexibilities for countries and has established an implementation support facility to respond to the immediate implications of the crisis for EITI implementation. To this end, for the next two years, the EITI itself has identified six opportunity areas to be considered by countries to improve extractive sector governance through and beyond the current crisis facing the world. These areas are energy transition, corruption risk, revenue mobilization, investment decisions, open data, and measuring impact.

Energy Transition

The energy transition is a trend that is gaining momentum, the EITI sees the data from EITI as an opportunity to use EITI data to address the energy transition, energy affordability and demand, and the need to sustain revenue streams from the Extractive sector. The Chatham House independent report recommendation prompted the EITI Board to agree in supporting countries on how to use EITI data for analysis, build the capacity of the MSG on how to join the conversation, and consider how to mainstream the energy transition through EITI implementation. Corruption risk, revenue mobilization, investment decisions, open data, and measuring impact are other priorities of the EITI implementation.

In Nigeria, the mining sector is focusing on its strategic minerals (gold, bitumen amongst others); Nigeria has approved its national climate change policy, which was updated in preparation for COP 26-the UN climate change conference scheduled for the UK. In the oil sector, the passage of the Petroleum Industry Act, Nigeria's "Decade of Gas" program, the establishment of renewable desks by oil and gas companies, and the increasing name change to include "Energy" in their names is response to the energy transition discuss. NEITI need to develop strategies to contribute to the energy conversation in Nigeria, partnering with relevant stakeholders. A scoping study will be carried out as a basis for engagement and a road map for energy transition issues in Nigeria. Oil and gas production remains a significant source of revenue in Nigeria.

Addressing Corruption Risk

In Addressing corruption risk, the EITI encourages countries to document and communicate EITI's potential contribution to anti-corruption efforts, drawing on existing mechanisms such as EITI reporting and MSG oversight for addressing corruption risks. The EITI is looking at strengthening its communications role in addressing corruption, clarifying priorities for implementation support, identifying opportunities for industry engagement, strengthening the capacity of MSGs to engage in corruption issues, and building partnerships with specialist anti-corruption actors.

In Nigeria, this anti-corruption drive has been one of the flagship issues the present administration is focusing on. Increased strides that have made global news have been achieved while high-profile cases are in court. The country has also enhanced and passed new legislation to improve accountability and transparency like the PIA 2021, Companies and Allied Matters Act (CAMA) 2020, Finance Act 2019, etc. NEITI has embarked on the following to enhance the anti-corruption efforts: Deeping its beneficial ownership transparency, having set up its own BO portal, it has committed to be among the pilot countries for the Opening extractives, which will see the country benefitting from technical capacity, committing to making contract transparency default, facilitating revenue forecasting, budgeting, and tax analysis. NEITI is part of the Presidential Revenue Monitoring and Reconciliation Committee. On having an accountable State-owned enterprise, the national oil company (NNPC), is now an EITI supporting company committed to commodity trading transparency.

NEITI has also signed MOUs with anti-corruption agencies in Nigeria; EFCC, ICPC, and NFIU.

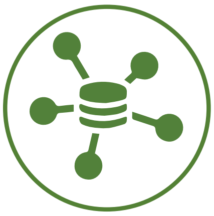
Strengthening Revenue Mobilization

On Strengthening Revenue Mobilization- with the recent downturn in the economy for most countries, priorities have shifted to revenue mobilization, and governments are also looking to increase indirect contributions through employment and local content and strengthen sub-national revenue flows and expenditures. The EITI 2019 standard requires more granular disclosures, enhancing the relevance of EITI data for tax collection and improving implementation support from the International Secretariat and its development partners. In Nigeria, revenue-generating agencies are focused on this trend with strategies, collaborations, and strengthened monitoring systems. The government has in place a centralized revenue collection and distribution system while also improving its budgeting system. NEITI has also identified helping the government harness its revenue mobilization drive as central to this Strategic Plan's theme and reporting. It also produces a technical report on the country's Resource Disbursement, emphasizing the revenues from extractives, how it is allocated, and spent, the capital projects done in the sub-national, and agencies set up to provide social amenities amongst others.

Investment Decisions

Recent investment decisions in the sector are informed by Environmental, Social, and Governance (ESG) metrics. There is a possibility to use the EITI, and its provisions can contribute to the evolving framework for ESG performance. The EITI has expectations of supporting companies as shown in the EITI guidance on transparency in commodity trading, Artisanal and Small-scale Mining (ASM), etc. NEITI reports have remained a data repository on information related to the EI value chain in Nigeria. It is constantly responding to FOI (Freedom of Information) requests both locally and internationally in the sector. It is committed to improving the data sets it produces and the analysis one can draw from them.

Open Data



The EITI encourages proactive data disclosures to gradually phase out the retrospective data reporting to enable informed decisions and public debate. They are also upgrading the role of the MSG from ensuring compliance to a greater emphasis on data use, analysis, and dissemination. NEITI has been implementing open data in its reports.

It has also done a gap analysis on extractive agencies and the reporting they would need to incorporate into their systems. It is working with NNPC on proactive disclosures and has recorded tremendous strides in the last two years. The plan is to carry this out bilaterally with other agencies. Nigerian government agencies are improving the information on their websites. As such, they will make the work of systematic disclosures one that can gradually take shape and phase out retrospective data reporting.

Measuring Impact

The EITI is ensuring that all its work measures impact. It recognizes a need to measure the difference in governance outcomes in implementing countries and gathers evidence on its impact across key dimensions of the EITI Standard. This is seen in its revised work plan guidance note, the need to have progress reports, and M&E frameworks. The EITI is presently developing frameworks to measure impact adequately. The relevance of impact is now crucial. NEITI is committed to improving its impact measurement in its work. It ensures that it gathers evidence and documents appropriately. One of its issues on impact measurement has been how to attribute its efforts to reforms and revenue collections as it relates to the recommendations from its audits.

3.4.2 NATIONAL PRIORITES

In defining NEITI's strategic priorities, we considered four of the nine priority areas identified by the Medium-Term National Development Plan (2021–2025): "build a thriving and sustainable economy", "attain sufficiency in power and petroleum products," "enhance social inclusion and reduce poverty", "build systems to fight corruption, improve governance and create national cohesion." As an agency that works in the natural resource governance space, in a country where the oil and gas sector accounts for more than 90% of the nation's export revenue, its activities will be critical toward meeting these priorities. In the last two years, the government has actively put-up mechanisms, revised laws, and signed new laws, all in the bid to support economic growth and recovery and promote fiscal transparency and accountability. A few of these with specific impact on the Extractive Sector include;

Economic Growth and Recovery Growth Plans
Mechanisms to support economic growth and recovery to promote fiscal transparency and accountability include:

1	The Finance Act, 2020; the FGN's quest to ensure that tax and fiscal laws are up-to-date and reflective of current economic realities.
2	The CAMA 2020; enhance transparency and stakeholders' engagement in corporate vehicles and, overall, promote a more friendly business climate.
3	The Strategic Growth Initiative (1.0 and 2.0); Identifying and exploiting sources that would largely boost and diversify the country's revenue base.
4	The Petroleum Industry Act, 2021: The key objective is to provide legal, governance, regulatory and fiscal framework for the Nigerian petroleum industry, the development of host communities and related matters.
5	The Nigerian Minerals and Mining Act, 2007; The key objective is to provide a legal, governance and regulatory framework for the Nigerian Mining Industry.
6	The Nigerian Minerals and Mining Regulations of 2011; provide guidelines on how mining operations should be conducted including obtaining mineral titles and sanctions for defaulters.
7	The Nigerian Mining Industry Roadmap; A guide for Nigeria to build a sustainable, globally competitive mining sector and related processing industries
8	The African Mining Vision; A knowledge-driven African Mining Sector that catalysis & contributes to broad-based sustainable growth and socio-economic development

The above and other initiatives of the government highlight revenue generation as a key policy initiative.

With the above, NEITI has an enabling platform with the laws and regulations in the sector to meet most of its EITI requirements, especially the emerging issues in the 2019 EITI standard. The Petroleum Act, 2021 has clear and specific sections that address beneficial ownership, contract transparency, governance, fiscal regime, and energy transition. The CAMA 2020 also supports Beneficial ownership transparency. NEITI now builds advocacy around these areas and will be relevant as most of the reforms started with the recommendations from its earlier reports.

3.5 THE NEW STRATEGIC DIRECTION

The preceding realities require NEITI to explore diverse ways of defining the direction for its 2022-2026 Strategic Plan. Most critical in that direction is the need to redefine the style of NEITI audit reporting focusing on contemporary issues within the context of the broader frame of its theme. In addition, any analysis of the global EITI implementation must reckon with the historic declaration by Nigeria in November 2003 to adopt the initiative to complement its economic reform agenda.

Substantially, Nigeria has lived up to expectations, despite the occasional challenges associated with its implementation. But, perhaps, the biggest of the challenges to the country's performance record is the task of sustaining the progress already achieved and the shining example it has become for other EITI implementing countries. The direction to sustaining that feat in the next strategic plan cycle (2022-2026) is to continue to provide the leadership in global EITI implementation by charting a new course for extractive industry governance through:

Innovation and Use of Technology	Focus on Relevant National and International Priorities
Development of Additional Frameworks For Transparency and Accountability	Strengthen Inter-agency Collaboration and Cooperation
Improve Quality, Access and Use of Extractive Industry Data	Redefinition of approaches To Strengthen Strategic Stakeholders Engagement
Strategic Policy Engagements	Strengthen Politcal Buy-in and Support and Ownership of the EITI Process
Promote Demand for Accountability	Operational Excellence

Innovation and Use of Technology: The milestones achieved with new policy research products have kept NEITI up-to-speed on extractive revenue disclosure under the implementation of the 2017-2021 Strategic Plan. With automation of the NEITI's audit process in the making, more grounds still need to be covered in terms of the innovative technology deployment to advance the work further as NEITI unveils the 2022-2026 Strategic Plan.

Focus on Relevant National and International Priorities: The next phase of work under the 2022-2026 Strategic Plan must expand beyond winning laurels within a narrow view of extractive industry revenue earning and management disclosure to include issues of national and international scope and relevance, including furthering foreign policy and economic diplomacy goals and objectives.

Improved Quality, Access, and Use of Extractive Industry Data: While NEITI must deepen its reports, it must also ensure unfettered access to the extractive industry data it generates and analyses in a machine-readable format that will make them amenable to comparative analyses and reviews with data from other EITI and non-EITI implementing countries.

Redefinition of Approaches to Strengthen Strategic Stakeholder Engagements: The new strategy must also reckon with the need to redefine NEITI's approach to engagement with stakeholders across government (including the National Assembly), civil society, businesses, and bilateral/multilateral lines. This is much more imperative, especially in the context of the anticipated changes in the status of NNPC, its associates/subordinates, and the new institutions earmarked to emerge under the new regime of the Petroleum Industry Act (PIA) 2021. Also, the focus will be expanded beyond the media to accommodate subnational and community affiliates relying on the Regional Representatives in the NEITI Board (NSWG) and the Civil Society Steering Committee (CSSC). Members of the NSWG and Civil Society Steering Committee will be supported to actively engage their constituencies on the contents and findings of the report; and communicate the report in a manner that links its contents to the daily realities of the citizens.

Additionally, strategic engagement with accountability actors and citizen groups on the contents and findings of the reports will be done. This approach will undoubtedly improve citizens' understanding of the audit reports and promote demand for accountability in the Nigerian extractive industries.

Development of Additional Frameworks for Transparency and Accountability: In line with the NEITI Act 2007, the agency must ensure that all its functions are implemented, such as Value for Money Audit. NEITI will also develop other transparency and accountability frameworks in line with the changing nature of the extractive sector and evolving issues.

Strengthen Inter-Agency Collaboration and Cooperation: NEITI must also demonstrate the desire and commitment to strengthening inter-agency collaboration and cooperation with covered entities in its audit reports and anti-corruption agencies (ACAs) such as the EFCC, ICPC, NFIU, and the Inter-Agency Task Team (IATT). This will enable it to expand and maximize opportunities for revenue recovery for the government through the development and deployment of additional frameworks for transparency and accountability.

Strategic Policy Engagements: To compensate for the limited number of sessions held under the 2017-2021 period, the 2022-2026 Strategic Plan will regularly prioritize strategic policy engagement.

Strengthen Political Buy-in and Support and Ownership of the EITI Process: NEITI must leverage its international affiliation, historical goodwill and reputation to cultivate and sustain needed political support and buy-in through careful and deliberate identification of champions among top government officials at the highest political level across the three arms and tiers of governments, and maintain constant engagement with these champions. It is important to note that political support is critical for the delivery and attainment of the agency's core mandate and broader objective.

Promote Demand for Accountability: One essential aspect of the NEITI's operations is the regular conduct and publication of oil, gas, and mining sector audits. The goal is to empower citizens, media, and accountability actors with timely and relevant data and information to demand accountability in the extractive industries. Regular disclosures of extractive industry data are meaningful only when they trigger public debate about how resource revenues can be used effectively and inform necessary reforms in the industry.

A review of the implementation of the 2017-2021 strategic plan revealed that NEITI did very well in the timely conduct and publication of extractive industry audit reports and demand accountability and reforms in the industries. Therefore, the new strategic direction will sustain and build on success recorded in this direction and implement initiatives that will inspire citizens and accountability actors to use the reports to demand accountability. The measures will include simplifying the reports; producing audio and visual clips of the reports; and translating the reports, into major local languages.

Operational Excellence: The ToC under the 2022-2026 Strategic Plan requires NEITI to commit to improving organizational performance through Professionalism, technology and innovation, capacity development, expansion to the geo-political zones, resource management capability, and use of incentives.

3.6 NEITI VISION, MISSION AND GOAL

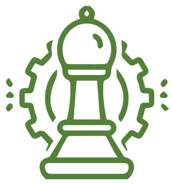
NEITI VISION

A Nigeria whose extractive sector is transparent, accountable, and beneficial to all.

NEITI MISSION

To institutionalize accountability mechanisms and processes to instill a culture of transparency and participation in Nigeria's extractive sector for the benefit of all.

STRATEGIC THEME



Maximising Revenue,
Enhancing Impact

STRATEGIC GOAL

To be a facilitator of the effective governance of the Extractive sector for maximum benefit to Nigeria

4.0

THE 2022-2026 STRATEGIC PLAN

4.2 STRATEGIC OBJECTIVES

In the development of this strategic plan, many processes were central in framing the strategic objectives. A consultative approach, workshops, interviews, and focus group discussion responses and suggestions were considered; and most of all, the statutory mandate of NEITI, the EITI Principles and Standard (2019), the new leadership in NEITI, the effects of the COVID-19 pandemic, the challenges in the sector, the political economy of the country and the socio-economic challenges in the country.

The agreed strategic objectives for the NEITI Strategic Plan (2022 – 2026) are stated below.

THE THREE STRATEGIC OBJECTIVES ARE

--------------- **1** ----------------

Strengthen extractive sector governance and reforms through policy research, strategic stakeholder engagement, communication, and inter-agency collaboration.

--------------- **2** ----------------

Sustain extractive reporting and relevance by focusing on National and Internation priorities.

--------------- **3** ----------------

Achieve operational excellence in implementing the NEITI mandate through Professionalism, innovation, use of technology, resource management and capacity building.

4.3 EXPECTED OUTCOMES & ACTIVITIES

Strategic Objective 1: Strengthen extractive sector governance and reforms through policy research, strategic stakeholder engagement, communication, and inter-agency collaboration.

	EXPECTED OUTCOMES	ACTIVITIES
1	Timely implementation of recommendations of audits and other studies.	Conduct a review and validation of the status of the NEITI audit recommendations. Develop a Remediation Plan. Re-activate and strengthen Inter-Ministerial Task Team (IMTT) Conduct targeted engagements with the government at the highest levels on issues identified by policy briefs/papers.
2	Improved revenue generation and fiscal regime for the Solid Minerals sector	▪ Conduct research on the fiscal regime in the Solid Minerals sector. ▪ Conduct policy dialogue on findings of research on the fiscal regime in the Solid Minerals sector ▪ Conduct exploratory studies on issues in the Solid Minerals sector value chain. ▪ Produce policy briefs & papers on EI issues.
3	Well-informed stakeholders on operations and issues in the EI.	▪ Conduct research and policy briefs on topical EI issues ▪ Publish and disseminate policy briefs. ▪ Produce simplified NEITI audit reports. ▪ Conduct public enlightenment programs. ▪ Design a strategy for social media engagement. ▪ Identify and engage policy champions on NEITI issues. ▪ Quarterly press briefing on NEITI activities and industry trends. ▪ Conduct regular media (radio) campaigns on NEITI/EI issues & processes.
4	Increased public access to NEITI report and knowledge platforms	▪ Design and produce information and communication materials. ▪ Publish and disseminate NEITI's report and knowledge products ▪ Design a framework for tracking public use of NEITI data. ▪ Engage with relevant agencies on public registers of licenses, contracts, and data mainstreaming. ▪ Identify/explore means/outlets through which the stakeholders and consumers of NEITI's reports and knowledge materials receive or wish/prefer to receive those products.
5	Broadened stakeholders' engagement	▪ Review and update stakeholder's map ▪ Conduct regular policy dialogue with relevant stakeholders on NEITI issues. ▪ Develop frameworks for stakeholders' engagement
6	Improved public understanding of the NEITI process	▪ Conduct capacity building workshop for operators/stakeholders in the extractive sector ▪ Publish annual progress report ▪ Review communication strategy ▪ Conduct stakeholders' engagements on NEITI reports & Issues. ▪ Conduct regular media/radio programmes that educate or inform the public about the NEITI process and EI issues.

	EXPECTED OUTCOMES	ACTIVITIES
7	Sustained engagement with relevant inter-agencies platforms	▪ Conduct inter-agencies mapping of EI ▪ Implement the inter-agencies mapping report and recommendations ▪ Conduct regular meetings of the Inter-agency Task Team (IATT) ▪ Embark on inter-agencies partnership on implementation-specific EI issues.
8	Broadened and strategic stakeholders' engagement at sub-national levels	▪ Review and implement a framework for subnational engagements. ▪ Conduct zonal outreaches led by zonal representatives on the NSWG ▪ Engage Governors' forum ▪ Engage Local Government Chairmen forum ▪ Setup sub-national contacts/offices ▪ Conduct Town Hall meetings on NEITI issues at subnational levels. ▪ Conduct a public perception survey on NEITI's mandate and operations ▪ Populate and publish the EITI stakeholder engagement template. ▪ Identify local or grassroots CSOs/NGOs,

Strategic Objective 2: Sustain extractive sector reporting and relevance by focusing on national and international priorities

	EXPECTED OUTCOMES	ACTIVITIES
1	Timely disclosure of information and data across the extractive industry value chain.	• Development of Audit ToRs • Conduct and Publish regular EI revenue, production & process audits. • Conduct and publish regular resource disbursement reports. • Produce NEITI Quarterly Reviews on revenue allocations. • Quarterly Review and update of BO register. • Quarterly Review and update of the NEITI data dashboard. • Activate and deploy data automation portal for EI data collection. • Implementation of the NEITI Mainstreaming strategy.
2	NEITI Reports meet international standards and best practices.	• Produce an SOP/ Manual for all audit processes. • Non-negotiable quality and integrity of NEITI reports. • Conduct scoping study of all sector reports.

	EXPECTED OUTCOMES	ACTIVITIES
3	Available and accessible quality EI information & data.	• Publish and disseminate EI & FASD reports. • Conduct regular website maintenance and upgrade. • Timely Response to FOI requests. • Populate and publish the EITI transparency template. • Populate and publish EITI outcomes and impact templates. • Populate and publish the EITI stakeholder engagement template. • Publish annual progress report.
4	(4) NEITI Activities, projects, information, and data respond to the current issues and needs of the public, government, accountability actors, and companies.	• Constant Review of audits TOR to reflect contemporary issues. • Constant tracking and publication of implementation of NEITI audit recommendations. • Conduct Biennial specialized assessments on the cost of production, materials, services, and specialized reviews of all investments in the extractive sector where the government has assets, and services in the extractive industry. • Bilateral and Multilateral engagement with covered entities to achieve systematic disclosure. • Design and implement the framework for disclosure of contracts and licenses in the extractive industry. • Design framework for reporting on energy transition. • Design framework on disclosure of Gender and Environment. • Conduct a study on the implications of the Petroleum Industry Act (PIA) on extractive industry transparency and accountability.' • Update the workplan to reflect findings on PIA implementation. • Deepen Beneficial ownership transparency through Open Ownership and EITI program on Opening Extractives. • Conduct scoping studies on NEITI reports. • Conduct scoping study on minerals that support renewable energy. • Conduct a Study on Artisanal Small-scale Miners (ASMs). • Conduct Study on Revenue leakages in the Solid Minerals Sector • Conduct a study on Strategic minerals and mineral corridors. • Conduct Study on Beneficiation and Minerals Buying Centers. • Conduct an impact analysis study on Environmental degradation in Host communities by EI companies' activities. • Develop a framework for Illicit Financial Flows (IFFs) risk assessment in the EI • Develop a framework for analyzing Licensing rounds in the EI sector.

	EXPECTED OUTCOMES	ACTIVITIES
5	Report on EITI and International Priorities	• Contract Transparency • Beneficial Ownership • Open Extractives • Gender • Scoping study on Energy Transition • Develop a framework for Energy Transition in Nigeria

Strategic objective 3: Achieve operational excellence in implementing the NEITI mandate through Professionalism, innovation, use of technology, resource management, and capacity building.

	OUTCOMES	ACTIVITIES
1	Improved efficiency in the management of resources and operations	• Develop a Funding strategy for NEITI. • Develop an M&E framework for the new Strategic Plan. • Develop a performance management system for NEITI (NSWG and Secretariat). • Review HR policy/manual. • Mainstream M&E into NEITI's daily operations. • Develop and publish an annnual workplan. • Conduct a midterm review of the workplan and update the work plan in line with the review outcome. • Produce monthly, quarterly and annual reports of NEITI's activities. • Develop robust Standard Operating Procedures (SOP) for NEITI
2	(2) Value-driven policies, processes, and procedures	• Conduct a corruption-risk assessment of NEITI's internal operations. • Develop a code of conduct/ethics for NEITI staff. • Conduct a survey on stakeholders' perception of NEITI.
3	An agency is driven by innovation, modern skills, and technology	• Conduct review/audit of NEITI ICT systems and infrastructure. • Upgrade system and infrastructure in line with recommendations of ICT review • Deploy modern technology for the NEITI process, procedure, and documentation. • Improve the human capacity of NEITI. • Conduct regular capacity-building workshops for NEITI stakeholders.

4.4 CRITICAL SUCCESS FACTORS IN IMPLEMENTING THE STRATEGIC PLAN

(i) Leadership: Everything is said to start and end with leadership. The nature, character, and style of leaders at all levels in an organization are critical to how successful or otherwise such an organization becomes in realizing its mandate and objectives.

To achieve the goal and objectives set out in the revised NEITI's Strategic Plan, leaders at all levels are not only expected to share and constantly exhibit the organization's vision, mission, goal, and objectives as defined in the Plan, but should endeavor to always act in manners that are consistent with the organization's core values. Besides providing direction and implementing activities outlined in the Plan, we must always reflect the multistakeholder approach of the global Extractive Industries Transparency Initiative (EITI). It is also crucial for leaders to motivate and reward staff members appropriately, including applying sanctions where necessary.

(ii) Staff Attitudes & Morale: A strategic plan is just a document; it is the collective actions of staff and organisation members that put life into it through their direct involvement in its implementation. Therefore, the success or otherwise of the Plan will rest squarely on the attitudes and dispositions of staff at all levels, as these are key to the actualization of the goal and objectives articulated in the Plan.

Staff morale is vital to organization culture and effectiveness - collective positive attitudes and high morale will create a positive work environment leading to effective implementation of the Plan, and low or negative attitudes and morale can adversely affect the implementation of the Plan and productivity of the organization.

In the workplace, positive attitudes and high morale go hand-in-hand. To achieve success in implementing the Plan and overall objectives of NEITI, staff members must cultivate a healthy attitude and Professionalism in discharging their various tasks. Therefore, the management should create and sustain a conducive/supportive work environment to boost staff morale and encourage positive attitudes.

(iii) Resource adequacy: Resources are necessary for organisations to execute plans and deliver on objectives. The Strategic Plan's success will depend on two key resources relevant to the type of activities required to execute the plan in the next five years. These are human and financial resources. NEITI needs human resources of the right size and quality to monitor and report on the extractive industry. The oil and gas sector, for instance, is a highly technical and complex industry. Oversight institutions like NEITI require unique skillsets to reduce or close the knowledge asymmetry between the operators and other parties. The right workforce size is also crucial to successfully executing a plan that has expanded the scope of operations to address new issues required to execute the mandate effectively. The new areas of work will have implications for the size of the organization's workforce. The financial resource is also key to the implementation of the Plan. Most of the proposed objectives require programmatic interventions to actualize them. These programmes and projects require financial resources to execute them. Therefore, financial resources need to be available, adequate, and optimally allocated. Any gap in financial resources or allocation would create a corresponding gap in performance that would threaten the achievement of the strategic objectives.

(iv) Stakeholders Buy-in and Adoption: The Extractive Industries Transparency Initiative (EITI), being implemented by the NEITI is multi-stakeholders-driven. Everything about the Initiative, from the composition of the National Stakeholders Working Group (NSWG), also known as governing Board, its regular extractive industries audits, and communication of audits findings to remediation, revolve around multistakeholder engagements. NEITI's stakeholders are categorized into two, viz: external and internal stakeholders – the external stakeholders, comprised of relevant government agencies, extractive companies, civil society/citizen groups, legislature, media, professional bodies, academia, development partners, auditors, etc. The internal stakeholders include NSWG members and Secretariat staff. NEITI is unique in the sense that all its external stakeholders are fully represented on its governing Board.

This, therefore, implies that the realization of the goal and objectives as outlined in the Strategic Plan will depend largely on the extent to which the stakeholders are involved in the preparation and implementation of the Plan. Effective stakeholder engagements across all the NEITI's work streams are key to the success or otherwise of the Plan. Efforts must be sustained to ensure that the NEITI multi- stakeholders structure is used as an advantage towards the realization of the goal and objectives of the Plan.

(v) Sector Dynamics: The extent of changes taking place in the sector would also affect the implementation and success of the Plan. An example can be given with developments such as the new Petroleum Industry Act (PIA), 2021, which implies sweeping changes in the structure and governance of the sector. First, the new Law will change the roles of key stakeholders in the sector and the way they operate. Secondly, stakeholders' response to the changes and how the changes affect industry operations will inevitably determine the outcomes of some of the strategic plan's programs. Therefore, the Plan will need to factor in these changes or at least prepare for the Law's potential impact on the industry. Similarly, reforms taking place in the solid minerals

sector would have the same implications for the Plan.
Other factors that may affect the Plan's implementation are shifts in global energy policy that may alter the direction of global extractive industry governance priorities.

(vi) Review of NEITI Act: The NEITI Act 2007, encapsulates the organization's mandate, defines the scope of NEITI's work, and provides the instruments for the execution of the mandate. Along with developing a new plan, the new leadership has also commenced a process to review

(amend) the Act. The proposed amendment to the Act aims to strengthen the governance structure of NEITI, enhance resource sufficiency and sustainability and increase operational effectiveness in line with the proposed objectives of the Strategic Plan. The Review of the Act is a necessary condition for successful implementation of the Strategic Plan.

vii) Political Environment (Political Will, Political Stability, Political Interference): Political conditions such as government policy thrust and direction, general stability and peace in the country, and attitudes of the political class and general public towards EITI implementation in Nigeria are major determinants to the level of success that will be recorded in the implementation of the Plan.

NEITI is a governments transparency institution to serve as a watchdog of governance systems and processes in the extractive sector. This is a delicate mandate and requires a conducive environment to implement. The political environment defines this conducive environment. In the first instance, the decision by the country to join the global EITI was taken at the highest political level. Hence the political environment shapes government commitment and influences the pace and seriousness of implementation.

The global EITI expects the government to demonstrate commitment to extractive industry transparency and accountability and lend its political weight to its EITI process. This would need to happen, both as a fulfillment of the global requirement and as a deliberate intention to improve governance of the extractive sector. Strong political will is required, particularly now that the scope of implementation has been expanded to cover sensitive areas like contracts and beneficial ownership transparency, which include unveiling the identities of politically exposed persons involved in extractive industries business and revealing the conflict of interests among government officials. Similarly, political will is required to move beyond mere disclosure of information and data to address remediation issues in the NEITI's reports, particularly those that require policy changes or reforms.

At the other end of the spectrum is the factor of political interference. The presence or absence of political interference would determine how effectively NEITI can implement the strategic plan. A high degree of political interference would reduce NEITI's operational independence, constrain and make it difficult to achieve its objectives. On the other hand, little or no political interference would guarantee its independence and increase the effectiveness of its programmes.

Finally, the stability of government policies during the period is vital to the successful implementation of the Plan. This is especially important given the possibility of a political transition that is scheduled to occur during the life of the next strategic plan. The policies and agenda of the next government for governance and reforms need to align with objectives of transparency, accountability, and operational efficiency for the Plan to succeed within the relevant period. Any significant deviation from these governance principles by the new government or new policies would seriously threaten the Plan's success.

NEITI
Nigeria
Extractive
Industries
Transparency
Initiative

UNITY AND FAITH, PEACE AND PROGRESS
THE PRESIDENCY