

NSWG Ref No: 03/2025

**MINUTES OF THE 7TH MEETING OF THE SIXTH NATIONAL
STAKEHOLDERS WORKING GROUP (NSWG) HELD ON TUESDAY, 11TH
NOVEMBER 2025**

The National Stakeholders Working Group (NSWG) met on November 11, 2025, both virtually and at the NEITI House, Wuye, Abuja.

Attendance

S/N	Name	Designation
1.	Sen. George Akume CON	Chairman (Rep by the PS GSO, Dr. Mohammed Sanusi Danjuma)
2.	Amb. Matthew Sunday Adoli MFR	Representative of North-Central Zone
3.	Prof. Abubakar Mu'azu	Representative of North-East Zone
4.	Mr. Olasupo Abdel-Jeleel Taiwo	Representative of South-West Zone
5.	Chief Ikechukwu Ikwuegbu	Representative of the South-East Zone
6.	Dr. Stephen Leo Akpan	Representative of South-South Zone
7.	Dr. Nguumbur Lovette Ononuga	Representative of FIRS
8.	Mr. Adedapo A. Segun	Representative of NNPC
9.	Mr. Dele Ayanleke	Representative of Miners Association, Nig.
10.	Dr. Erisa Danladi Sarki	Representative of the Civil Society
11.	Engr. Nkechi Isigwe	Representative of Women/Geo-Scientists
12.	Comrade Williams Akporeha	Representative of NUPENG
13.	Dr. Orji Ogbonnaya Orji	Executive Secretary/CEO

Apologies

1.	Barr. Musa Abdullahi Lawan	Representative of North-West Zone
2.	Mr. Gwueke Ajaifia	Representative (OPTS)

NEITI Staff in Attendance

❖	Mrs Jane Onwumere	Director Legal Services
❖	Mrs. Sadiya Gashinbaki	Team Leader, Legal Services

REFERENCE: NSWG/03/2025	
1 2	1.0 OPENING: The Meeting commenced at 11.40am with the rendition of the First Stanza of the National Anthem.
3 4 5 6 7	2.0 REVIEW AND ADOPTION OF THE AGENDA NSWG Members reviewed the agenda for the meeting. Mr. Olasupo Abdel-Jeleel Taiwo, Representative of South-West Zone moved a motion for the adoption of the agenda, and was seconded by Mr. Dele Ayanleke, Representative of Miners Association, Nigeria.
8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32	3.0 CHAIRMAN'S OPENING REMARKS The opening remarks were delivered on behalf of the NSWG Chairman, the Secretary to the Government of the Federation (SGF), Senator George Akume, CON, by Dr. Mohammed Sanusi Danjuma, FCNA, Permanent Secretary, General Services Office. He welcomed members and reaffirmed the Board's critical responsibility as custodians of Nigeria's transparency and accountability framework in the extractive sector. He commended the Secretariat for its discipline and productivity, noting Government's ongoing efforts to sustain support despite fiscal constraints. He informed the Board that the Chairman continues to brief the President on EITI obligations and conveyed the President's strong commitment to the EITI, anchored on reforms in fiscal management, revenue assurance, sector restructuring, and investor confidence in which NEITI plays an essential role. Reiterating Nigeria's dedication to the EITI, he urged improved performance ahead of the 2026 Validation. He commended the Executive Secretary and NSWG members for their resilience and encouraged continued transparency, accountability, and reform in extractive governance. He expressed appreciation to the EITI International Secretariat, the Belgian Embassy, and other development partners for their support. He acknowledged NEITI's progress on the 2023 Validation corrective actions and their integration into the 2025 Workplan, as well as strengthened collaboration with OPTS, the Mining Authority, and civil society groups whose engagements align with national reform priorities. He highlighted NEITI's strategic policy contributions, noting the importance of the policy briefs on <i>"Cost of Borrowing and Debt Servicing at the State Level</i>

33	<i>and the New Tax Revenue Framework”</i> . He commended the commencement of
34	the 2024 audit cycle and assured attention will be paid to funding challenges
35	affecting NEITI’s work.
36	He expressed satisfaction with NEITI’s digital transformation efforts, especially
37	the Data Centre project, which he described as potentially transformative for
38	timely and systematic extractive disclosures.
39	In closing, he outlined priority areas for the Board as follows;
40	❖ Ensuring full readiness for the 2026 Validation
41	❖ Addressing funding challenges in collaboration with the Ministry of Finance
42	and relevant institutions
43	❖ Supporting Government reforms with evidence-based analysis; and
44	❖ Deepening collaboration across constituencies.
45	4.0 EXECUTIVE SECRETARY’S STATUS UPDATES
46	The Executive Secretary (ES) welcomed members and thanked the Permanent
47	Secretary, GSO, Dr. Mohammed Sanusi Danjuma, for his remarks. He noted that the
48	update covered activities since the last Board meeting.
49	4.1.1 NSWG Activities in 2025
50	The Executive Secretary reported that two NSWG meetings had been held in 2025, with
51	the second meeting addressing funding delays and emerging industry issues. Key
52	decisions included ratifying the NEITI - NHRC MoU, the CSO Protocol, as well as
53	receiving the FIRS updates on N17.35 trillion tax collections in government revenue
54	from extractive sector operations.
55	4.1.2 Implementation of 2023 EITI Validation Corrective Actions
56	He informed members that the corrective actions were prioritised, embedded into the
57	2025 Workplan, and supported through intensified constituency coordination. The
58	progress review and retreat are scheduled for 10-11 December 2025 in Lagos.
59	4.1.3 EITI Global Engagements
60	The ES participated in an EITI Peer-Learning Session in Amman, Jordan, on 24
61	September 2025. He presented Nigeria’s leading initiatives, including policy briefs,
62	open data tools, and the integration of transparency into fiscal and climate reforms such
63	as TSA fuel subsidy review and emissions tracking.
64	4.1.4 NEITI Policy Briefs
65	He reported the release of the policy brief “ <i>Beyond Federal Allocations: The Cost of</i>

66	<i>Borrowing and Debt Servicing at State Level in Nigeria</i> ". A second brief, " <i>Beyond</i>
67	<i>Assent: Pathways for Implementing Nigeria's New Tax and Revenue Framework</i> "
68	will be released alongside the 2023 FASD Audit in December 2025.
69	4.1.5 2024 Industry Audit – Status Updates
70	4.1.5.1 Solid Minerals Audit
71	The ES reported that following NSWG approval of a ₦6 million materiality threshold, a
72	memo will be presented at the meeting to seek an upward increase to ₦10 million to
73	allow better alignment with the EITI Standard. Under the proposed scope, 228
74	companies will be covered (≈86% sectoral coverage). Data submissions include: 30
75	compliant companies, 71 pending, and 127 unreachable. Of the 9 relevant MDAs, 6
76	have submitted data, while NGSA, FIRS, and SMDF remain outstanding. He warned
77	that completion is at risk due to funding shortfalls; a Risk Assessment Report will be
78	presented.
79	4.1.5.2 Oil and Gas Audit
80	Data collection continues, with 69 out of 100 entities submitting, 29 pending, and 2
81	non-operational. The Preliminary Information System has been submitted and the
82	Inception Report is expected soon. A reconciliation meeting is proposed for December
83	2025 in Abuja. Coverage currently stands at 89 companies and 11 government agencies
84	(60% revenue coverage). Engagements with FME, NMDPRA, NESREA, and JDZ aim
85	to close remaining gaps. Stop-gap funding is needed to enable timely completion.
86	4.1.6 Finance and Budgetary Performance
87	NEITI received seven overhead releases and full personnel funds in 2025 but no capital
88	allocation, resulting in an overall budget performance of 20.92%. A detailed financial
89	report will be presented.
90	4.1.7 Institutional Governance Reforms
91	NEITI's governance systems have been strengthened under the leadership of the
92	Executive Secretary and the Secretary to the Government of the Federation. The NSWG
93	approved a new NEITI Conditions of Service aligned with the Public Service Rules and
94	the EITI Code of Conduct, providing for merit-based recruitment, performance
95	management, ethics compliance, and enhanced staff welfare. Approval from Office of
96	the Head of Civil Service was secured with support from the Board Chairman.

97	4.1.8 Digital Transformation of Financial Systems
98	NEITI's digitalisation of its Public Finance Management systems is nearing completion.
99	The system enhances fiscal discipline, automates reporting, and addresses Validation
100	gaps.
101	4.1.9 Review of the 2025 Workplan
102	Due to funding constraints, the 2025 Workplan was reprioritised to focus on statutory
103	obligations and high-impact EITI deliverables while sustaining stakeholder engagement.
104	4.1.10 Extractive Industry Reforms
105	The Executive Secretary highlighted several reforms announced at the 2025 Nigeria
106	Mining Week. These include:
107	❖ Deployment of Mining Marshals;
108	❖ Expansion of the Electronic Mining Cadastre;
109	❖ Establishment of the Solid Minerals Development Company (a long-standing NEITI
110	recommendation);
111	
112	❖ Launch of a \$680 million National Geological Exploration Fund with NEITI
113	providing transparency oversight.
114	He noted NEITI's continued contribution to reforms in the oil and gas sector, including
115	support for anti-theft enforcement, improved production levels, and investments in
116	CNG and the AKK pipeline.
117	4.1.11 Enhancing Company Engagement
118	Through the renewed NEITI - OPTS Companies Forum, industry collaboration has
119	improved. OPTS will host the next NSWG meeting on 12 December 2025 in Lagos.
120	4.1.12 NEITI - NNPC Ltd Strategic Cooperation
121	A high-level meeting held between NNPC and NEITI on 25 August 2025 agreed on an
122	MoU and Joint Technical Committee covering data sharing, beneficial ownership, and
123	contract disclosure. The draft MoU is under joint review.
124	4.1.13 Civil Society Engagement
125	NEITI deepened its relationship with CSOs in 2025, particularly through the transition
126	of PWYP into the Resource Justice Network (RJN). Engagements with Spaces for
127	Change, Global Rights, CISLAC, and others strengthened with evidence-based
128	advocacy and community participation.

129	4.1.14 Nigeria’s Removal from the FATF Grey List
130	Nigeria’s removal from the FATF Grey List on 24 October 2025 reflects stronger inter-
131	agency action against illicit financial flows, with NEITI contributing via the AML/CFT
132	Inter-Ministerial Committee.
133	4.1.15 Support from Development Partners
134	Key partners including the Ford Foundation and EU/IDEA RoLAC continue to support
135	NEITI through studies, technical assistance, and funding for corrective-action
136	workshops.
137	4.1.16 NEITI Data Centre Project
138	The Data Centre is now in its software development phase, covering platform
139	integration, interactive dashboards, real-time data tools, and capacity building. It will
140	align with the Global EITI Database Project.
141	4.2 Conclusion
142	The Executive Secretary noted a shift from policy intent to measurable delivery across
143	governance, fiscal discipline, industry engagement, and reform alignment. He thanked
144	the Board for its resilience and urged continued support ahead of the next Validation
145	cycle.
146	4.2 COMMENTS ON THE EXECUTIVE SECRETARY’S UPDATE
147	The North Central Zonal Representative, invited members to make observations and
148	comments on the Executive Secretary’s presentation.
149	The South-east zonal Representative commended the Executive Secretary for the
150	detailed update and sought further clarification on some issues. He asked the Executive
151	Secretary to elaborate on the following:
152	❖ The role of citizens within the EITI framework, particularly how citizens interests
153	and community-level concerns are reflected in NEITI’s work and in the
154	transparency and accountability pillars of the initiative.
155	❖ How the global EITI Standards can be contextually adapted to reflect Nigeria’s
156	unique governance environment, cultural context, and sector realities, while still
157	maintaining alignment with international requirements and not compromising on
158	transparency and accountability.
159	❖ Issues arising from the recent NEITI policy briefs, including whether any critical
160	components may have been omitted and how recommendations were prioritised for
161	States with varied fiscal conditions.

162	❖ The rationale for increasing the materiality threshold in the Solid Minerals Audit
163	from ₦6 million to ₦10 million and the potential implications on sector coverage.
164	❖ The need for stop-gap funding for the Industry Audit, and what options exist to
165	mitigate risks posed by delayed capital releases.
166	❖ NEITI's strategic positioning in ongoing extractive sector reforms, and whether
167	NEITI's contributions are sufficiently recognised and utilised by Government.
168	❖ NEITI collaborates with Publish What You Pay (PWYP) now Resource Justice
169	Network (RJN), and need for regular publishing of what you receive and the
170	utilization profile
171	❖ Whether NEITI data compliments National Bureau of Statistics (NBS) data and in
172	cases of potential discrepancies between NEITI data and that of the NBS, how both
173	institutions coordinate to ensure consistency and data integrity.
174	The Representative of the FIRS sought further clarification on the NEITI Data Centre
175	Project. She inquired whether the system would include Application Programming
176	Interface (API) capabilities, noting that if fully operational, the Data Centre would serve
177	as an invaluable tool for national data integration. She also highlighted that the Nigeria
178	Revenue Service (NRS) when it comes on board on 1 st January 2026 will rely heavily
179	on advanced intelligence systems to access real-time data on key transactions,
180	underscoring the importance of interoperability between NEITI's platform and the tax
181	administration infrastructure.
182	4. 3 RESPONSES FROM THE EXECUTIVE SECRETARY
183	In response, the Executive Secretary thanked Chief Ikwuegbu and Dr. Ononuga for their
184	thoughtful observations, noting that they reflected close attention to the presentation. He
185	provided the following clarifications:
186	❖ On citizens' role within the EITI framework, he explained that EITI implementation
187	is intended to support accountability to citizens, and NEITI's engagement with civil
188	society and communities is one of the primary channels through which citizens'
189	voices influence extractive governance. He emphasised that transparency delivers its
190	full value only when citizens can use the information to demand reforms.
191	❖ On contextual application of the EITI Standard, he noted that the global Standard
192	cannot be altered for any country, but implementation approaches can be adapted to
193	local realities. He clarified that Nigeria's approach such as the focus on policy

194	briefs, fiscal reforms, and digital transparency reflects its own context while
195	remaining fully compliant with global requirements.
196	❖ On the policy briefs, he explained that the recommendations were included and were
197	deliberately strategic and measurable, focusing on issues with the greatest fiscal
198	impact. While no brief can cover every possible issue, the selected themes offer the
199	most critical insights for improving borrowing practices and revenue governance.
200	❖ Several States have formally commended NEITI for these analysis.
201	❖ On increasing the materiality threshold, he noted that the adjustment is intended to
202	focus audit efforts on companies making substantial contributions to government
203	revenue. This aligns with EITI good practice and ensures efficient resource use
204	without compromising the integrity of the audit.
205	❖ On stop - gap funding, he clarified that NEITI operates on milestone-based
206	payments for industry audits. Because capital releases have been delayed, letters
207	have been sent to relevant authorities requesting temporary support to avoid
208	disruptions. Discussions with the Accountant-General of the Federation and the
209	Minister of Finance are ongoing to resolve this.
210	❖ On funding challenges, he emphasised that NEITI is not alone; many MDAs are
211	facing similar constraints, and the situation reflects broader fiscal pressures at the
212	national level.
213	❖ On NEITI's strategic role in reforms, he reiterated that NEITI is a policy advisory
214	institution that recommends reforms through data and evidence, while Government
215	leads implementation. When Government actions reflect NEITI recommendations,
216	the credit is shared as part of the broader accountability ecosystem.
217	❖ On OPTS hosting the next NSWG meeting, he clarified that the EITI is built on a
218	tripartite structure Government, Civil Society, and Industry. While NEITI does not
219	accept funds from companies, Industry and CSOs may provide technical support or
220	host meetings as part of their commitment to the process.
221	❖ On data coordination with NBS, he explained that NBS provides national-level
222	socio-economic statistics, while NEITI focuses specifically on extractive sector
223	data. Both institutions collaborate, share data, and complement each other's work to
224	ensure consistency and completeness. NEITI is about to sign an MOU with the NBS
225	to support NBS with extractive sector data.

226	❖ On the NEITI Data Centre, he confirmed that the platform will incorporate APIs
227	enabling data exchange with other MDAs, including those transitioning to digital
228	tax administration systems. This will allow real-time data sharing and strengthen
229	inter-agency collaboration.
230	5.0 MINUTES OF LAST MEETING
231	The minutes of the meeting held on 26th August 2025 were reviewed. Members
232	provided comments, observations, and corrections as follows:
233	5.1 Corrections
234	❖ Page 1: Dr. Lovette Ononuga clarified the correct spelling of her middle name as
235	“Nguumbur.”
236	❖ Page 2: Chief I. Ikwuegbu observed that the full names and designations of NSWG
237	members had already been listed at the beginning of the document. He advised that
238	repeating names with full titles throughout the minutes makes the document
239	unnecessarily voluminous. He recommended that either names only or designations
240	only should be used going forward.
241	Following the review, Dr. Lovette Ononuga moved the motion for the adoption of the
242	minutes, subject to corrections, and this was seconded by Mr. Dele Ayanleke.
243	5.2 MATTERS ARISING
244	Matters arising from the previous minutes were considered as follows:
245	5.2.1 Stakeholder Constituency Engagements
246	It was earlier proposed that letters to State Governors be signed by the SGF to improve
247	access and cooperation.
248	The Executive Secretary reported that:
249	❖ The Secretary to the Government of the Federation noted that Board members’
250	appointment letters already serve as formal introduction and additional letters not
251	required.
252	❖ Requests for ID cards and complimentary cards: The Secretary to the Government
253	of the Federation also was of the view that these are not required.
254	Amb. Matthew Sunday Adoli sought clarification on who would notify a Governor
255	when a Zonal Representative visits their State (e.g., Benue).
256	Mr. Olasupo Abdul-Jeleel Taiwo inquired whether individual members may write
257	directly to Governors for constituency engagements or if Secretary to the Government
258	of the Federation’s endorsement was required first.

259	The Executive Secretary responded that the Secretariat is fully available to support all
260	zonal representatives and will facilitate outreach whenever needed.
261	5.2.2 2025 Budget Constraints
262	The Executive Secretary will continue engagements with the Federal Ministry of
262	Finance and other relevant authorities to ensure the release of both capital and overhead
263	funds. Updates will be provided to the Board as progress is made.
264	5.2.3 Engagement with Development Partners
265	The Secretariat will continue to pursue strategic partnerships with development partners
266	and explore additional non-financial support, including technical assistance and
267	capacity building opportunities.
268	5.2.4 Federal Inland Revenue Service (FIRS)
269	❖ A formal request for training for the Board and Management of NEITI is to be sent
270	to the Executive Chairman of FIRS. The Executive Secretary noted he would liaise
271	with the FIRS Representative to ensure the request is properly conveyed.
272	❖ Mr. Olasupo Abdul-Jeleel Taiwo asked whether similar training requests could be
273	made to NNPC and the Executive Secretary confirmed that this is possible and
274	would be explored.
275	5.2.5 Engagement with NDDC and Other Statutory Agencies
276	NEITI is to strengthen engagement with statutory agencies including NDDC, NCDMB,
277	PTDF, and TETFund to enhance transparency and accountability in sectoral fund
278	utilization. The Executive Secretary reported that engagement with NDDC is ongoing,
279	though the agency has been less responsive, but efforts will continue.
280	5.2.6 Collaboration with TETFund
281	NEITI is to deepen collaboration with TETFund under the existing MoU, focusing on
282	capacity-building and knowledge sharing programmes. Work is currently in progress on
283	this collaboration.
284	5.2.7 Follow-Up on Constituency Requests
285	The Executive Secretary noted that the constituency engagement framework is being
286	reviewed to align with current realities and will be presented at the Lagos meeting.
287	5.2.8 Mounting Challenges for Indigenous Mining Operator
288	The Executive Secretary reported that these concerns were raised strongly at the 2025
289	Nigeria Mining Week, and follow-up actions are being planned.

290	6.0 STAKEHOLDERS CONSTITUENCY REPORTS
291	6.1 Civil Society Organizations (CSO)
292	The Representative of the Civil Society, appreciated the Executive Secretary for
293	sustained engagement with the CSO constituency, particularly during their transition
294	into the Resource Justice Network (RJN). She expressed optimism for deeper future
295	collaborations. She reported that the constituency has not yet received the requisite
296	support to commence the re-evaluation and onboarding of members into the Civil
297	Society Steering Committee (CSSC), nor to update the broader CSO database both of
298	which are critical for strengthening the constituency and ensuring inclusivity.
299	The CSO Representative proposed regional outreach initiatives, including town hall
300	meetings at the community and subnational levels, to gather feedback and prepare
301	citizens' groups ahead of the 2026 EITI Validation.
302	She further highlighted the pending finalization and signing of the NEITI NHRC MoU
303	and the NEITI Civil Society Protocol, both previously approved in principle by the
304	NSWG. She appealed for Secretariat support to fast-track their conclusion.
305	6.1.1 COMMENTS TO THE CSO REPORT
306	❖ The Executive Secretary assured that the Secretariat would continue to support CSO
307	activities, recognizing the vital role of civil society in NEITI's work. He informed
308	members that a special CSO-focused session will be held at the forthcoming NSWG
309	meeting in Lagos to resolve outstanding issues.
310	❖ He added that the NHRC MoU is being finalized, and the delay is mainly due to
311	constituency-wide consultations necessary to ensure alignment. On CSO
312	constituency meetings, he noted that NEITI does not dictate how or when CSOs
313	meet, given their independence; however, the Secretariat will always provide
314	facilitation and non-intrusive support within available resources.
315	❖ Representative of the South-east zone sought clarification on the status of Nigeria's
316	2026 EITI Validation preparations. He also raised concerns about ensuring that
317	extractive transparency translates to citizen-level impact, noting that without
318	information flowing to the grassroots, EITI risks becoming an elitist exercise.
319	❖ He recommended developing a policy advocacy framework to engage Federal and
320	State Governments on transparency regarding revenues received and their

321	utilization, particularly at the subnational level. He asked for clarity on the role of
323	the newly transitioned RJN in this regard.
324	❖ The Civil Society Representative responded that although PWYP has transitioned
325	into RJN, the core vision remains unchanged promoting community benefits, citizen
326	awareness, and development-driven resource governance. She explained that the
327	newly established Citizens Monitoring Network was created precisely to address the
328	gaps highlighted, enabling communities to monitor resource utilization and demand
329	accountability. She also asked for updates on validation readiness.
330	The Executive Secretary explained that NEITI has already addressed key corrective
331	actions highlighted in the validation report, including reconstitution of the NSWG, CSO
332	representation, and strengthening of internal governance systems through the new
333	Conditions of Service. He noted that the remaining corrective action relates to contract
334	disclosure and is being actively pursued with NUPRC and NNPC.
335	6.2 Companies
336	6.2.1 Miners Association of Nigeria
337	Mr. Dele Ayanleke, representing the Miners Association of Nigeria, thanked the
338	Executive Secretary and Secretariat for their strong support during the 10th Nigeria
339	Mining Week (12 - 15 October 2025). He noted that NEITI's participation, including a
340	presentation on the evolution of the Mining Week, strengthened public understanding of
341	sector improvements over the last decade and helped reinforce transparency in the
342	minerals industry.
343	He informed members of the Association's recent visit to the Minister of Solid Minerals
344	Development, Dr. Henry Dele Alake, where the idea of a quarterly sectoral dialogue for
345	stakeholders was proposed. He confirmed the Minister's assurance of NEITI's inclusion
346	in future engagements.
347	6.2.2 Comments to the Miners Representative's Report
348	❖ The North-west zonal representative commended the Executive Secretary and his
349	Management Team for their commitment despite limited resources. He noted that
350	the continuation of key activities under tight constraints demonstrates strong
351	dedication to NEITI's mandate. The Executive Secretary appreciated the
352	encouragement.

353	❖ The South-east zonal representative acknowledged the extensive reforms underway
354	in the solid minerals sector and commended NEITI for its contributions under
355	challenging circumstances. He reiterated the NSWG's commitment to supporting
356	the Secretariat to achieve more.
357	6.3 Women in the Extractive Sector
358	The Representative of Gender/Geosciences reported that her constituency has engaged
359	with women in mining and listened to their concerns. She explained that discussions
360	raised critical issues around environmental vulnerability, particularly for women living
361	in mining communities. She noted that NEITI should deepen attention to Environmental
362	Impact Assessments (EIAs), community risks, and remediation practices, adding that
363	transparency must also address human and community wellbeing. She further noted
364	ongoing engagement with the National Council of Women Societies (NCWS) to
365	strengthen women's participation in extractive governance.
366	6.3.1 COMMENTS TO THE WOMEN IN EXTRATIVES SECTOR REPORT
367	❖ The South-east Zonal Representative sought clarification on the nature of women's
368	involvement in the sector whether they are employees, artisanal miners, or informal
369	labourers.
370	❖ The Gender Representative clarified that mining is not gender-exclusive; women
371	engage in virtually all aspects of mining operations, including manual hauling of
372	minerals. She emphasized that women are often the most vulnerable due to
373	environmental exposure and inadequate community safeguards, hence the need for
374	robust Environmental Impact Assessments and company engagement.
375	❖ The Representative of the Miners Association of Nigeria provided additional
376	context, noting that Women in Mining is a recognised NGO advocating gender
377	inclusion and child protection in the mining sector, often working in partnership
378	with various agencies. He reiterated that women undertake the same technical and
379	labour-intensive roles as men in the field.
380	6.4 South South Zonal Representative
381	The South-south Zonal Representative reported attending a public hearing on the
382	proposed Akwa Ibom Oil and Gas Development Commission, where he advocated that
383	such a Commission would improve transparency and accountability in revenue
384	allocation. He also participated in engagements with the Ministry of Environment and
385	about Thirty (30) Host Communities Development Trusts, where concerns were raised

387	that only three communities had received benefits from oil companies despite the
388	provisions of the PIA 2021. He shared recommendations to address these gaps at the
389	event.
390	He also highlighted activities of four oil companies operating in Akwa Ibom waterways
391	without proper recognition, the need for the State Government to identify and regulate
392	them for appropriate revenue collection, and the importance of strengthening NEITI
393	zonal offices to ensure sustainability and grassroots-level impact.
394	6.4.1 COMMENTS TO THE REPORT
395	❖ The Executive Secretary commended The South-south Representative for his efforts
396	and welcomed Akwa Ibom's plan to establish a development commission. He
397	suggested naming it the Akwa Ibom Energy Development Commission, reflecting
398	the global shift beyond oil and positioning it for broader investment opportunities.
399	❖ The North-central Zonal Representative supported the call for strengthening zonal
400	offices, underscoring their value in expanding NEITI's reach to local communities.
401	6.5 South West Zonal Representative
402	Mr. Olasupo Abdul-Jeleel Taiwo reported on participation in the Companies Forum
403	meeting in September, where he represented the NSWG. He raised concerns about
404	revenue leakages related to dredging activities in Lagos and requested guidance from
405	FIRS. He noted that the FIRS Representative has been supportive in addressing this
406	issue.
407	6.6 North Central Zonal Representative
408	Amb. Sunday Adoli noted that there was no report from the constituency but he would
409	like to visit Kogi and Niger states in January 2026.
410	6.7. South East Zonal Representative
411	Chief I. Ikwuegbu aligned his report with that of the South-south Zonal Representative,
412	noting the persistent challenges affecting EITI implementation at the zonal level. He
413	emphasized that subnational revenue collection and utilization remain critical and
414	suggested that an audit of zonal financial flows may be necessary.
415	The Executive Secretary responded that NEITI's FASD Audit already covers revenue
416	received and utilized by States and relevant agencies. He noted that stakeholder
417	engagements are essential for communicating these findings. He also clarified that
418	establishing zonal offices would be highly beneficial but capital intensive, especially
419	given the current fiscal constraints. He noted the need for a stakeholder mapping for

420	engagement and the NEITI secretariat could provide the list of stakeholders in the
421	zones.
422	7.0 CONSIDERATION AND APPROVAL OF BOARD MEMOS
423	7.1 Upward Review of Solid Minerals Industry Audit Materiality Threshold
424	The Executive Secretary presented the memo stating that the NSWG earlier approved a
425	materiality threshold of ₦6 million for the ongoing 2024 Solid Minerals Industry Audit
426	based on preliminary submissions and data from the Mining Cadastral Office (MCO) and
427	other regulatory agencies. The ₦6 million threshold initially captured 339 reporting
428	companies, representing a payment coverage ratio of approximately 90%. However, upon
429	further technical review and in light of recent developments within the industry, it has
430	become both necessary and prudent to revise the materiality threshold upward to ₦10
431	million. This proposal is anchored on evolving realities within the sector and the need to
432	balance comprehensive coverage with audit efficiency, cost-effectiveness and data
433	reliability.
434	7.2 NSWG Approval
435	Following the presentation of the memo and subsequent deliberations, the NSWG
436	approved the upward review of the Solid Minerals Industry Audit materiality threshold
437	from ₦6 million to ₦10 million, based on the justifications provided.
438	Mr. Dele Ayanleke, President, Miners Association of Nigeria, moved the motion for the
439	approval of the new threshold, and the motion was seconded by Mr. Olasupo Abdul-
440	Jeleel Taiwo, Zonal Representative of the South-west Zone.
441	8.0 ANY OTHER BUSINESS (AOB)
442	8.1 Absence of the EITI Observer
443	The Executive Secretary informed members that the Ambassador of Belgium to Nigeria,
444	H.E. Pieter Leenknecht, regretted his inability to attend the meeting as he is currently
445	unavoidably absent. He conveyed his regards to the NSWG.
446	8.2 Appeal Regarding Delay in Payment of Allowances
447	The ES appealed for NSWG members' understanding regarding the delay in payment
448	of allowances, noting that unlike previous meetings, payments would not be made
449	immediately due to the challenge with budget releases. He assured members that all
450	payments have already been processed and funds are expected shortly.

451	8.3 Travel Arrangements
452	The South-east-Zonal Representative expressed concerns about travel arrangements
453	made by development partners and the travel itineraries, noting that such arrangements
454	often place him at a disadvantage and require caution. He recommended that all travel
455	plans be made and communicated early to avoid recurrence.
456	8.4 Postings on social media
457	The Executive Secretary highlighted a note of caution on what Members post on social
458	media as it could have an impact on the validation of Nigeria. NSWG members are
459	expected to be non-partisan. The validation process is elaborate and includes views
460	from a broad range of stakeholders.
461	8.5 Recognition
462	The Board noted the conferment of an honorary fellowship on Mr. Dele Ayanleke by
463	the Nigerian Society of Miners, acknowledging that the recognition reflects positively
464	on the NSWG.
465	8.6 NEITI Nominal Roll
466	The South-south Zonal Representative commented on the NEITI nominal roll shared
467	with the Board and observed that the two individuals listed as indigenes of his state,
468	Akwa Ibom, do not bear names consistent with those of indigenes of the state. He
469	expressed concern that this may indicate that the federal character principle was not
470	reflected during the recruitment process. The Executive Secretary responded that both
471	candidates represent the state.
471	8.6 NEITI Position on Oil Theft Investigation
472	The South-east Zonal Representative sought clarification on NEITI's position regarding
473	the alleged missing \$303 billion under investigation by the House of Representatives
474	and whether the matter is covered in the NEITI Audit Report. The Executive Secretary
475	responded that NEITI was invited and provided its position based on the data from the
476	Audit reports.
477	8.5. Wedding Invitation
478	The ES informed members of the forthcoming wedding of the daughter of Mr. Olasupo
479	Abdul-Jeleel Taiwo. He noted that the information has been communicated to the
480	Chairman and requested members to keep their calendars open between 10th - 13th
481	December, adding that a formal notice will be posted on the NSWG platform.

482	9.0 CLOSING REMARKS
483	The Executive Secretary thanked members of the NSWG for their active
484	participation and valuable contributions. He noted his preference for in-person
485	meetings but explained that due to funding constraints, the virtual format was
486	necessary to ensure statutory meetings were held as required. He expressed
487	appreciation for members' cooperation, assured that allowances for the meeting
488	and various committees would be processed immediately after the session, and
489	hoped that future meetings would be held physically as the financial situation
490	improves.
491	On behalf of the Chairman, Amb. Matthew Sunday Adoli, MFR, thanked all
492	members for their commitment and declared the meeting adjourned.
493	A motion for adjournment was moved by Mr. Olasupo Taiwo Abdel-Jaleel and
494	seconded by Engr Nkechi Isigwe.
495	The meeting ended at 3:10p.m.

MATTERS ARISING		
S/N	ACTION REQUIRED	RESPONSIBILITY
1.	Funding Challenges NEITI to continue engagement with Federal Ministry of Finance and relevant authorities for release of capital & overhead funds.	NEITI Secretariat
2.	Government Inter - Agency Engagements ❖ Send formal training request to FIRS Executive Chairman for Board & Management capacity building. ❖ Explore training/capacity-building collaboration with NNPC. ❖ Strengthen transparency engagements with NDDC, NCDMB, PTDF & TETFund ❖ SGF's office to support NDDC access.	Executive Secretary
3.	2025 Miners Week; Action Point: Secretariat to follow up with relevant agencies on issues raised at Mining Week.	NEITI Secretariat
4.	CSO Report Support CSO onboarding, database update; finalize NHRC - NEITI MoU & NEITI -CSO Protocol.	Executive Secretary & CSO Representative
5.	Zonal Constituency Reports ❖ Explore scalable mechanisms for zonal engagement pending resource availability. ❖ FIRS to support NEITI in addressing dredging-related revenue losses.	NEITI Secretariat
6.	NSWG Allowances Secretariat to ensure processed payments are disbursed once funds are received.	NSWG Board Secretariat
7.	Next NSWG Meeting Travel arrangements to be communicated early to avoid split itineraries.	Executive Secretary and Board Secretariat

8.	Wedding Notification Note upcoming wedding of Mr. Taiwo's daughter; keep calendar open (10–13 Dec).	All NSWG members
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SIGNED:


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Orji Ogbonnaya Orji Ph.D
Executive Secretary


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Jane O. Onwumere
Director Legal Services